

Response to the Joint Local Transport Plan 4 Consultation March 2019

TravelWest: 2019-2036

By Churchill and Langford Residents Action Group (CALRAG)

1. The JLTP4 is largely an unsubstantiated, contradictory, wish-list.

- 1.1. The JLTP4 is not consistent with the Joint Spatial Plan (JSP), the Technical Evidence Work (TEW) or the Issues and Options (North Somerset Local Plan 2036) consultations.
- 1.2. We have already responded to the Joint Spatial Plan, the Technical Evidence Work (attached below) and the North Somerset Issues and Options Local Plan 2036 consultations.
- 1.3. The JLTP4 is full of inconsistencies in itself and thus totally confusing. It lacks sufficient information and figures have been omitted e.g. the percentages. Table 12.2 page 130/1
- 1.4. Disturbingly it highlights a huge funding gap of £6 billion amounting to two thirds of the required finance but offers no solution. Figure 10.1 p110.
- 1.5. It must be remembered that the SDLs 7.5 (Banwell) and 7.6 (Churchill/Mendip Spring) have not been consulted upon.
- 1.6. JLTP4 offers an M5 A38 corridor route which now lacks crucial elements and remains objectively-speaking, strategically unjustified and remarkably impractical.
- 1.7. The JLTP4 does not address existing problems on local roads.
- 1.8. Assessments that were due to be released- one in December 2018 are notably absent.

2. Inconsistencies within the JLTP4 itself regarding M5 J21a:

- 2.1. J21a is now apparently absent. The Sandford, Churchill bypass element is a remote and vague "smudge on the map".
 - 2.1.1. What route would the bypass follow?
 - 2.1.2. Would it plunge straight through SDL 7.6?
 - 2.1.3. Where will the corridor connect to the A38?
 - 2.1.4. Would a spur road emerge at the junction of A38 and A368 (Churchill traffic lights)?

3. This M5 to A38 new road is an expensive, so-called 'economic link'. It remains simply a facilitator for remote housing estates without the possibility of local employment.

- 3.1. It is unlikely that the second bypass – the eastwards component, (Sandford and Churchill bypass) will ever be built, on the grounds of crippling cost and low Benefit/Cost Ratio (BCR). Therefore, a Banwell bypass built in isolation and coming out at Towerhead between Banwell and Sandford will simply encourage further traffic chaos in the villages east of Banwell – Sandford, Churchill, Upper Langford, Burrington, Blagdon and the villages beyond including the Mendip Hills AONB.
- 3.2. A Banwell bypass built in isolation will further open the floodgates to HGVs heading from the midlands to the ports. Currently, Banwell's traffic calming measures are a deterrent to these HGVs.

- 3.3. The bypass will be dependent upon the construction of 1900 houses at Banwell SDL 7.5, adding even greater traffic congestion as a result within Banwell, Winscombe and other villages.
- 3.4. Traffic surveys have consistently demonstrated that approx. half of the traffic going through Banwell goes towards Winscombe. Therefore, with the additional 1,900 houses using Winscombe as their local market town, a Banwell bypass will not solve the volume of cars travelling through Banwell resulting from the proposed new housing.
- 3.5. The Banwell bypass itself is seriously flawed since realisation of a Castle Hill bypass is impossible.

4. **Strategic Corridor/Economic Link.**

- 4.1. There is no Strategic Corridor or Economic Link between the M5 and the A38
"Improve transport connectivity along this key economic link will have benefits"
 Section 6 Page 30.
 - 4.1.1. How can it be improved if it doesn't exist?
 - 4.1.2. Why is it referred to as a 'Key' economic link?
- 4.2. There is no business clustering in this area, *'There is potential for further business clustering along the A38 strategic corridor and the Mendip Spring area, including opportunities for unlocking development'*. Section 6 page 30. So how can further business clustering be assumed? These statements are inaccurate and misleading.

5. **Projected improvements on the A38 north towards Bristol** appear to have been omitted in this JLTP4.

6. **Bristol Airport**

- 6.1. How the JLTP4 deals with the transport implications of access to projected Airport expansion is opaque.
- 6.2. Highways England have expressed major concerns. M5 J20 improvements are more plausible for Airport access than J21 (or 21a).
- 6.3. As above (4.1) there is no economic corridor route and the Airport has little interest in improved connection to the SW peninsula via this route. Most of the Airport's passengers come from Bristol and the North, East and West.
- 6.4. Page 38 *"The airport's catchment area spans the South West and into South Wales, with 19% of air passengers originating from Devon and Cornwall, 10% from Somerset and 20% from South Wales"*. Therefore 29% of passengers come from the Devon, Cornwall and Somerset and the remaining 71% come from north of the airport including South Wales and Bristol. It is misleading to include South Wales passenger figures as though they come from the South.
- 6.5. These transport proposals for the Airport expansion are fundamentally inadequate because:
 - 6.5.1. They remain stubbornly primarily roads-based. (ie business as usual)
 - 6.5.2. The Metrobus expansion remains disturbingly inadequate because, despite segregated elements of the route, much of the network shares with others a common congested road-space.

6.5.3. Remote SDLs in North Somerset will fail to connect to the proposed routes. The private car will remain the only plausible transport mode.

6.5.4. No alternatives are offered to divert a major part of commuting flow off the road network.

6.5.5. 21st century public transport alternatives linking Bristol with the Airport, WsM and population centres at Nailsea and Clevedon are notably absent.

7. **Commuting** – the new SDLs 7.5 Banwell and 7.6 Churchill/Mendip Spring – will they be dormitory towns?

7.1. There is an underlying problem of heavy reliance on extended commuting.

7.2. North Somerset Council's Strategic Planning and Economic Development Scrutiny panel (12.03.2019) acknowledged that building 4,000 houses in the two SDLs (7.5 and 7.6 Banwell and Churchill) is fundamentally flawed and to quote them "We got it wrong". The Councillors have called for these proposals "to be scrapped" and in their place the houses to be constructed close to the jobs in Bristol where residents can walk, cycle or use public transport. This makes perfect sense for health, wellbeing and of course the environment.

7.3. This demonstrates that the flawed concept of proposing to construct the necessary new homes in SDLs situated 15 miles from Bristol and 9 miles from Weston-S-Mare persists, despite the lack of or potential for employment opportunities in this area. Consequently, new home owners will commute to Bristol.

7.4. The more disseminated these housing developments become, the more extreme becomes the commuting problem thus created.

7.5. Affordable housing is vital but is rendered much less practical if distributed within widely dispersed remote housing estates located far from major centres of population, entertainment and employment. The BNP Paribas report for the JSP concluded that no affordable housing would be possible in either of the SDLs 7.5 and 7.6 due to abnormal building costs associated with pluvial flooding from the Mendip Hills.

8. Environment

8.1. Decarbonisation of our society is increasingly recognised as crucial and yet these present plans will perversely promote the opposite – and result in a poorly-connected, congested chaos.

8.2. North Somerset Council, Emergency debate on climate change February 2019 and resolved that the council "*recognises the serious global Climate Challenge Emergency; asks officers to prepare a report on the actions North Somerset Council could take with the aim of achieving carbon neutrality by 2030 with an idea of costings, aiming to bring back a report to Council around June; and asks the Chief Executive to write to the Government minister on our achievements and asks for resources when we know what the detailed proposals might be.*" How can carbon neutrality by 2030 be achieved when North Somerset Council is planning to build 2 garden villages in remote locations and massive additional road building to serve them?