

**NORTH SOMERSET COUNCIL
CORE STRATEGY EXAMINATION
CPRE NORTH SOMERSET POSITION STATEMENT
13th December 2011 Hearing Day 3**

Issue 4a: Housing Trajectory & 4c, d, f & g: Infrastructure

Summary

1) The south west Bristol urban extension appears to have gained prominence without the implications of river crossing and highway infrastructure within Bristol City and North Somerset being considered. The costs will be high and we are concerned to minimise the cost to the public purse. We perceive two potential risks to the viability of the extension that arise from the possible scale of infrastructure costs. First, the costs to the developers may be high enough to bear directly on the viability of the site. Second, the flow of large windfall sites within Bristol is likely to continue. Housing development on those sites will relieve congestion in the city by allowing people to choose to live closer to their work. Consequently their infrastructure costs are likely to be lower, making them preferred development targets, further undermining the business case for the Ashton Park extension and potentially making it a white elephant in the Core Strategy.

2) We have looked in the five Broadway Malyan master plan documents for the extension and many of the other hearing documents but we have not been able to find any consideration of these infrastructure implications.

River Crossing Traffic congestion

3) The master plan documents declares aspirations to reduce the extension's impact on traffic congestion by various public transport projects. We support the proposals for such projects and would wish them well. However, attitudes to commuting are entrenched and, based on the analysis of Census data on the ONS web site, they will probably carry less than 20% of commuters. The problem that public transport has is that it's not cost effective for it to serve most people's homes and work destinations, particularly where housing density is low.

4) The analysis of census data on the ONS web site shows, at Local Authority level, that residents of Bristol commute 9.5km, on average, with over half of them commuting by car. These averages are used to illustrate our concerns about bridge and highway infrastructure costs and the implications for the viability of the site. We don't claim these figures to be the most appropriate but we feel that their background puts them in the right ballpark. What they show is that car users commute widely across the city. Consequently it's reasonable to suppose that a

substantial proportion of the working residents of the extension will commute across the river.

5) Master Plan Document LD15 page 98 estimates the morning peak hour car trips generated by the extension at 6000. It also states that the current morning peak hour traffic flow is 1900 on the A370 and 1700 on the A38, a total of 3600. This means that commuting flows from the extension are estimated to be 60% larger than currently commuting at the south west of the city from on the A38 and A370. This means that, at that time of day, for every 6 cars that currently commute on those routes, 10 more will be added by the extension. The master Plan's estimate also means that even if only 30% of the extension's commuters try to use their nearest river crossing then the traffic flows across the Cumberland Basin will more than double. The figures given for the afternoon peak hour would give even worse congestion.

6) That is why we believe that infrastructure costs of the river crossing and highway work in Bristol City will be substantial. That is why we raise the possibility that that the scale of developers' contributions could bear on their enthusiasm for the site.

Alternative sites

7) However, we perceive another risk arising from these high infrastructure costs.

8) The Bristol Local Plan Sustainability appraisal, authored by David Tyldesley, reviewed the Plan that expired in 2001. Paragraph 10.5 remarks that "... most of the housing sites allocated on the Proposals Map have not been implemented. This is a most unusual feature of a modern local plan, yet the City has fulfilled its Structure Plan targets almost entirely through ... windfall sites."

9) Research on the contribution from windfall sites based on expired Local Plans, also authored by David Tyldesley, is reported in CPRE's 1997 "More Welcome Homes". Its results indicate that the total capacity of windfall sites that have come forward in recent years provides a realistic estimate of the capacity of windfall sites that are likely to emerge in the next few years.

10) There is consequently a realistic expectation that windfall sites will continue to come forward within the Bristol City Boundary. Advantages will accrue to developers, residents and Bristol City Council from preferential residential development of such sites, particularly those north of the river. Advantages include:

- Better housing affordability due to improved housing supply within the city.
- Relief of existing traffic congestion because workers can choose to live closer to their work
- Lower infrastructure costs.

11) Developers' infrastructure contribution to such sites, on a per unit build basis, is likely to be lower than that for the Ashton Park extension. Such sites could therefore become the preferred choice for developers thereby bearing on the viability of the extension. An analysis of the impact of traffic congestion caused by the extension compared with the impact of sites north of the river may bear on Bristol City Council's position on the extension.

In Conclusion

12) PPS12 para 4.10 calls for core strategies not to place undue reliance on critical elements of infrastructure whose funding is unknown. Consequently, if the inspector is minded to recommend reintroduction of the Ashton Park extension to the Core Strategy, we feel that, in partnership with Bristol City Council a traffic analysis should be carried in order to establish the order of cost for this infrastructure. This will allow recommendations on the delivery plan to reflect likely developer contributions.