



Robert Young  
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Examination of the Bristol Local Plan 2022-2040

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Dear Mr Young,

### **BRISTOL LOCAL PLAN PUBLICATION VERSION (BLPPV) IN4: MATTERS, ISSUES AND QUESTIONS - WRITTEN STATEMENT FROM NATIONAL HIGHWAYS**

We are writing further to the publication of item IN4 of the Bristol Local Plan Examination webpage, which was copied to ourselves via email dated 11 December 2024. This statement is in response to the further information from Bristol City Council (BCC) and is prepared in accordance with the terms and guidance detailed in item IN4 – Appendix 2.

National Highways are Strategic Highway Authority, responsible for operating, maintaining and improving the Strategic Road Network (SRN) and has an interest in the potential impact of planned growth at Bristol on the M32, M4 Junctions 19-22, M5 J14-19, M49 J1 and the A4 Avonmouth junctions to determine whether the additional traffic demand can be met within the existing capacity of the SRN or if mitigation is needed.

This statement builds on our earlier letter dated 25 January 2024 which was submitted under Regulation 19.

#### **Engagement with Bristol City Council**

Throughout our discussions with BCC regarding the emerging Local Plan we have highlighted current performance matters relating to the SRN, within and just outside the authority boundary, and the need for robust transport evidence to support the Plan. Our requirements are in line with DfT Circular 01/2022 paragraphs 47 to 54 and NPPF paragraph 115. It is fundamental that local plan transport evidence is integrated to consider both local highway and strategic highway matters. A transport modelling report was provided to us in September 2024 (Examination Document EXA024a<sup>1</sup>). National Highways was not invited to comment or input to the scope of the transport evidence prior to its publication.

In our Regulation 19 consultation response we continued to stress the need for a robust transport evidence that appropriately considers the SRN. We consider that our previous comments remain unaddressed by the LPA and this statement sets out areas where further

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<sup>1</sup> [EXA024a PQ14 P20 Bristol City Council – Local Plan Testing, Local Plan Modelling Outputs Report, Bristol City Council July 2024](#)

information is required to determine that the impact of the BLPPV will not result in an unacceptable impact on the safe operation of the SRN, in accordance with NPPF.

## Proposed Allocations

We acknowledge the Local Plan has a spatial development strategy that focuses growth on city centre locations. We endorse this approach, seeking to minimise the need to travel and promoting opportunities for sustainable modes. This approach is effective in managing demand on the Local Highway Network, however it does not necessarily remove pressures on the SRN in equal measure, which is relied on for longer distance trips which are more prone to be carried out by car. As such we continue to require proportionate evidence to evaluate the impact of growth within the city on the SRN, enabling us to confirm whether the plan proposals are justified and deliverable.

Policy H1 of CSD001 Bristol Local Plan Publication Version (BLPPV, p.68) states “An annual average minimum of 1,925 new homes will be delivered over the plan period to 2040. The aspiration is that this figure will be exceeded where this can be supported by service and infrastructure capacity.” However:

- There is a lack of clarity regarding the scale of development in several policies. For example:
  - a. Policy DS3: St. Philip’s Marsh (BLPPV, p.25) states “Thousands of new homes...” and no clarity of quanta is provided in the explanatory text supporting the policy, and
  - b. Policy DS2: Bristol Temple Quarter (BLPPV, p.21) states only “New homes...”
- Where the explanatory text does provide an indication of development potential, cumulatively this totals over 18,000 dwellings, yet
- Table 6-1 of EXA024c PQ14 P20 indicates 4,448 dwellings and 6,055 jobs are to be provided by the Plan.

We therefore remain unclear of the total quantum of housing and employment proposed by the BLPPV. There is no indication as to the scale of non-residential development within each development strategy area. In addition, the BLPPV does not identify an upper quanta of housing and employment (a) at each allocation and (b) cumulatively that could be provided in the Plan period.

## Plan Policies

National Highways considers that the transport text in the development strategy policies should be informed by the outcome of the strategic modelling evidence. Given the BLPPV was published before the transport modelling evidence, we query whether this has been satisfactorily achieved. If SRN improvements or other forms of mitigation are found to be necessary to mitigate an unacceptable safety or capacity impact on the SRN this mitigation will need to be secured by appropriate Plan policies and signposted within the IDP.

Policy DS5: Frome Gateway (BLPPV, p.31) states the inclusion of a logistics provision adjacent to M32 Junction 3 and that Newfoundland Way will be enhanced as a mixed-use city street with a strong built form and active building frontages. National Highways would expect an indication of the assumed scale and types of logistics land uses proposed for this allocation

and how access might be made to inform whether the impact of this allocation may affect the continued safe operation of the M32 and Junction 3. It would also need to be determined that the active frontages to Newfoundland Way would not have an adverse impact on the safe operation of the M32.

In our letter dated 25 January 2024 we requested that the last sentence of Policy T3A: Transport development management (p.144) include the additional underlined text: "Proposals should be supported by a Transport Assessment/Statement and/or a Travel Plan where development is likely to have a significant traffic impact and/or road safety impact." This has not been included in the BLPPV.

We also noted that the requirement in Policy T3A(i) to 'secure low vehicle speed' would not be appropriate on the SRN and request that the policy wording is amended to reflect the distinction between the SRN and local highway network.

### Traffic Modelling

National Highways was not consulted on the scope of the transport evidence base and methodology used to undertake assessment of the BLPPV, nor to identify with BCC any mitigation required to safely accommodate planned growth. If mitigation is required to accommodate BLPPV growth, further detailed discussions with BCC regarding the scope and scale of mitigation, the timing of delivery, the delivery mechanism and funding will be required. Relevant policy text within the Plan would need to be updated to secure the requirement for the delivery and funding of this necessary infrastructure.

The modelling report makes no reference to any SRN junction impacts arising from the BLPPV.

Our main observation (and emphasis in **bold**) from the modelling report is the final paragraph, which states (p.45):

*"The main message from this modelling - adding additional housing and jobs (associated with the local plan) does not result in a proportionate increase in highway trips and most of the extra trips are by sustainable modes. Whilst this is a positive message, in terms of policy aspirations, the limitations of WERTM, as a strategic tool, means that **AtkinsRealis would urge caution in assuming that additional development growth can be accommodated and won't result in highway impact without more thorough detailed checks and suitable mitigation to adopt more sustainable travel.**"*

National Highways raised several queries relating to the Plan's transport evidence via email to BCC on 20 January 2025 ahead of a meeting with the Council scheduled on 21 January 2025. We had hoped to seek clarification on some of these matters at this meeting. However and unfortunately, the meeting was cancelled by BCC immediately prior to the meeting start. We have subsequently been contacted by BCC via email on 4 February 2025 requesting a meeting to discuss the comments set out in our email dated 20 January 2025 which we would welcome.

National Highways note that Table 6-1 of EXA024a PQ14 P20 (p.30) states the Plan will provide 4,448 dwellings and 6,055 jobs in addition to the DM scenario. As mentioned earlier,

Policy H1 states that “The aspiration is that this figure will be exceeded where this can be supported by service and infrastructure capacity.”

In our letter dated 25 January 2024 we requested that the transport modelling should include a scenario that indicates the development ‘cap’ suggested by Policy H1 as being limited by service and infrastructure capacity. To date we have not seen the transport evidence which reflects the upper limit of development proposed by the BLPPV. We are therefore unsighted on the transport impacts and any necessary mitigation required to support the upper limit of development identified within the BLPPV.

The development policies of the Plan place an emphasis on the need for sustainable transport infrastructure and public transport services. Following discussions with the Council, we also understand highway interventions are or will be limited only to address road safety.

Table 8-1 of the modelling report (p.44) shows 2,166 trips made by car and 14,594 trips in total made using public transport, on foot and cycling. We request clarification of how sensitive the modelling is to the provision of sustainable transport, and whether the public transport mode share is responsive to public transport capacities and service frequency.

### **Cumulative Impact of Development**

Alongside the Bristol Local Plan Publication Version (BLPPV), local plans are progressing in the neighbouring districts of Bath & North East Somerset, North Somerset and South Gloucestershire. National Highways has consistently flagged concerns to BCC, and the other authorities surrounding the city, that the cumulative growth proposed in their plans is likely to exceed the current SRN capacity and put pressure on the motorway junctions in the West of England. This will exacerbate existing peak period congestion on the M32 into Bristol, and the M4 and M5 motorways with risk of increased safety concerns.

Consistent with our work across the country, clarification has been sought from BCC regarding the modelling assumptions made for Local Plan allocations in South Gloucestershire, Bath & North East Somerset and North Somerset. We would also appreciate confirmation on whether any of Bristol’s housing need is being met by neighbouring authorities.

DfT Circular 01/2022 is clear in stressing the importance of considering necessary improvements to the SRN as part of the preparing a Local Plan and that this is the best opportunity to consider the cumulative impact of development, including planned growth in adjoining authorities. National Highways has therefore previously advised BCC that we would expect discussion regarding transport impacts to be underway with neighbouring authorities, with the Local Plan transport evidence base ideally considering the cumulative impact of growth within its own and neighbouring emerging Local Plans. If this work is not proposed by BCC we would expect this to be discussed with ourselves and the neighbouring authorities to consider potential wider implication.

### **Infrastructure Delivery Plan**

We note that EVEI01 Infrastructure Delivery Plan Draft was prepared before the publication of the modelling report (September 2023 and July 2024 respectively). National Highways would expect the infrastructure requirements identified in the IDP to be informed by the results of the transport modelling evidence base. We are therefore unsure how the transport infrastructure

detailed in the IDP has been determined and of the relationship between the IDP, transport modelling and other relevant policies.

The IDP states (p.4, para.1.1) that it "...outlines the infrastructure and community facilities and services that are needed to support the growth in the city to 2036..." This statement appears to be inconsistent with the Plan period which runs to 2040.

The IDP makes no mention or provision of any mitigation or funding required on the SRN. We are unsighted on whether this is supported by the transport modelling evidence with SRN matters not addressed in the modelling report.

The Infrastructure Schedule of the IDP draft includes (p.29) "M32 park and ride to reduce congestion on the M32...". The M32 is part of the SRN. We are unclear of the status of the M32 Park & Ride proposal, how it relates to the BLPPV and the contribution it makes to development mitigation.

### **Joint Local Transport Plan**

The Plan and Policy T2 (BLPPV, p.143) refer to the West of England Combined Authority (WECA) Joint Local Transport Plan 4 (JLTP4) for the period 2020-2036. The JLTP4 is dated March 2020 and may not include policies or infrastructure schemes to support proposed development allocations in the BLPPV. The explanation for Policy T2: Transport infrastructure improvements states that "These will be updated when JLTP4 is refreshed."

JLTP4 is currently being refreshed by WECA. We do not know if BCC has detailed to WECA the interventions they have identified as necessary to accommodate development identified in the BLPPV, and which interventions WECA is content to include in an updated JLTP. Additionally, the emerging JLTP4 may have identified cross boundary transport requirements that should be captured in the BLPPV. Clarification of the interaction of the JLTP4 and emerging Local Plan is requested.

### **Conclusion**

At this time National Highways considers that further information is required to determine the traffic impact of growth as identified with the BLPPV. We would welcome the opportunity to work collaboratively and proactively with the Council to ensure the Plan is supported by a robust evidence base necessary to determine the impact of the Plan, and to identify any mitigation that may be required to ensure the continued safe operation of the SRN.

We trust that our response is helpful and assists with BCC's Local Plan preparation. If you require further clarification or wish to discuss any of the above, please do not hesitate to contact us.

Yours sincerely,



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