

Richard Dunning

[REDACTED]

Pucklechurch

South Gloucestershire

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2nd October 2017

Ms Amanda Deeks

Chief Executive

South Gloucestershire Council

Chief Executives & Corporate Resources Department

PO Box 1953

Bristol

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Dear Ms Deeks

Please take this letter as an objection to both the proposed M4J18A and the consultation that South Gloucestershire Council has held into the siting of the junction. The consultation has assumed that a motorway junction and associated roads are a panacea to the transport ills that blight the northern Bristol fringe. It is not, it is a recipe for greater pollution, ill health, congestion and is the death knell for part of the green belt that by South Gloucestershire's own admission is of strategic importance.

As I live in Parkfield you may say this is 'nymbyism' however that is not the case and to illustrate I refer to an old Eastern saying that civic duty is an old person planting a lilac tree that they know they'll never sit in the shade of. Well as someone with a terminal illness I wish to plant my metaphorical lilac tree and oppose the M4 Junction 18A and the damage it will do to the green belt – I want to see the green belt saved not for myself but for future generations.

South Gloucestershire council is part of the West of England combined authority. This authority espouses a vision where:

- "The rich and diverse environmental character will be integral to health and economic prosperity. Patterns of development and transport will facilitate healthy and sustainable lifestyles. New development will be designed to be resilient to, and reduce the impacts of climate change.
- Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links.
- [The authorities are] integrating housing and employment development with investment in reliable, high quality transport choices will reduce the length and number of journeys to work, encourage more sustainable travel modes such as cycling, walking and public transport and reduce the reliance on car based journeys.

- [The authorities will] maximise the effectiveness of sustainable travel choices and encourage mode shift (to rail, MetroBus, Park & Ride, bus, cycling, walking) across the plan area;
- [The authorities] maximise the effectiveness of non-car mode choices for both urban living and new development outside existing urban areas.”

How does what is being proposed lessen dependence upon the car and maximise ‘non-car modes?’ Even considering a Junction 18a is regressive, damaging and completely at odds with the stated vision and rhetoric around sustainability. You yourselves have provided the answers to solving the problem within the strategic vision documents of the combined authorities. Independent research by Campaign for the Protection of Rural England shows more road means more cars; means more congestion; means more problems; means more roads all of which are in fact damaging to economic growth and sustainability. Even evidence in the Greater Bristol Strategic Transport Study identified that “improved linkage to the M4 is likely to encourage long distance commuting to and from developments in Emersons Green and Pucklechurch which would go against the principles of sustainable development.”

Where are the ‘smarter choices’ to promote walking, cycling and new technology to move around, alongside corridors of integrated, ‘multi-modal’ investment, to tackle congestion and promote a shift in trip making from the private car onto more sustainable transport modes? Where are the traffic management measures? The eye watering sums of money involved in the construction of the new junction could revolutionise transport in the West of England and potentially radically reduce congestion as well as reducing air pollution and meeting carbon reduction targets.

If you are following your own guidelines and strategy, how is a new junction the solution? Where is the evidence of adherence to the joint authority’s visions or that South Gloucestershire Council is following its own guidelines? Make the existing infrastructure work efficiently and effectively in line with the JTS, JSP and all the other strategies the authorities have produced. Why does Highways England claim to support measures for reducing the need to travel by private car and therefore unnecessary use of the Strategic Road Network yet supports a proposal for more roads which will do the opposite and increase traffic, exacerbating the problem.

The Eastern options not only destroy Green Belt impacting on the fauna and flora and peoples’ livelihoods, it dissects a network of footpaths discouraging walking, will increase air pollution, harming all those in the locality including children at the local school. It will divide communities, increasing car use, cause noise and impact on wellbeing. How does this meet the commitment to healthy and sustainable lifestyles?

The area the proposed Eastern option would devastate is not an idyllic landscape however it is Green Belt and it is a working landscape, supporting a productive and vital farming industry which contributes to this country’s food security. Throughout the Pucklechurch and Siston parishes there are similar green spaces, productive farmland or natural habitats. It is not just ‘open countryside’ as it was erroneously referred to in some consultation documents.

The destruction caused by the Eastern options is permanent and irreversible. This option poses a threat to the very essence of the area and impacts on not just people and their livelihoods and health but the wildlife, insects and biodiversity. Underlying this is a deep anxiety that in the longer term, this damage to the Green Belt and the resultant degrading of the land surrounding the proposed route is just the beginning. Ultimately it is the landowners who stand to make enormous sums of money as local authorities, tempted by to need to meet the demands for housing, will inevitably apply greater pressure on these 'damaged' areas of Green Belt which will ultimately become ripe for development.

Moving on to the South Gloucestershire Council consultation. Consultation is defined as – *'The dynamic process of dialogue between individuals or groups, based upon a genuine exchange of views, and normally with the objective of influencing decisions, policies or programmes of action.'* (Royal Town Planning Institute Guidelines on Effective Community Involvement and Consultation, my underlining).

The consultation undertaken by South Gloucestershire Council has been at best lacking in basic information and at worst misleading with bias in consultation descriptions, maps and language. It has been down to the parish council to identify short-comings including:

1) That the impact studies are lacking:

- Traffic volumes and capacity - insufficient/no detail provided,
- Air quality: not mentioned at all,
- Noise: no explanation of noise important areas & not marked on plan,
- Water Resources: no details provided impact of eastern options,
- Flood Risk: EA information not sourced/provided for eastern options,
- Landscape: no detail provided other than reference to 'green belt,'
- Ecology: insufficient detail, underestimates impact, biased presentation,
- Visual Impacts: insufficient detail, biased presentation,
- People and Communities: Option B – severe adverse impact,
- Cultural Heritage: insufficient detail, underestimate of impact,
- Greenhouse gas effects: not mentioned at all.

2) "The traffic predictions show that on average the 400, 000 journeys will take around 2% less time". That equates to just 72 seconds per one-hour journey.

3) Impacts on other infrastructure not considered:

- Bristol Water and the gas pipe line,
- Compulsory Purchase – would be required for land and buildings,
- The EIA makes no allowance for the impact that both Eastern options would have on the Gypsy & Traveller community and safe-guarded sites,
- Contradictions between costings estimated at earlier stages of the feasibility study process as evidenced by FOI requests.

This raises the question of how meaningful the consultation process has been if complete, objective and accurate information is not provided. Indeed one must question whether it was fit for purpose.

Then, to underline unease about the consultative process I discover that on 22nd September '17 there was a meeting of the West of England Combined Authorities Overview and

Scrutiny Committee. In the case of the Joint Transport Study (last item on the Agenda) two full papers were included both prepared by W S Atkins. Titles: W of E JTS Exec Summary Sept 2017 and W of E JTS Final Report Sept 2017. On page 109 of the Report are the estimates for the costs of the all the proposals. M4 Junction 18a is described as a new motorway junction and 6 km of dual carriageway road; the cost is given as £265m. The current consultation, which closes 16th October, costs the Eastern Route Option B at £328m but this includes £65 for upgrading the M4 to a managed motorway which the JTS Report lists separately, so the net figure is £265m. Equivalent figures are Option A £285m and Western Route £407m. The Final Report is not subject to scrutiny by any others in the meantime so one must assume it will stay as it was at the close of this meeting. If all three Options were still under consideration I would expect the JTS Final Report to cater for the cost of the most expensive option (Western) not the cheapest. Incidentally the JTS Final Report assesses the M4 managed section 18 to 19 at £150m.

I am therefore concerned that this report to the Joint Scrutiny Committee for the WOE JST M4J18A consultation could be looked upon as evidence of at best incompetence or at worst predetermination and collusion.

My question then would be how this figure of £265M and numerous assumption in the report come to be accepted when the public consultation regarding three alternative route options for the proposed new junction, which does not conclude until October 16th 2017 and the final feasibility study report which is not due to be presented until March 2018 have to be finalised. The consultation should inform the report whereas the opposite seems currently to be the case. I would welcome an explanation of this. Please treat this as a formal request for a response.

I look forward to your reply,

Richard Dunning