



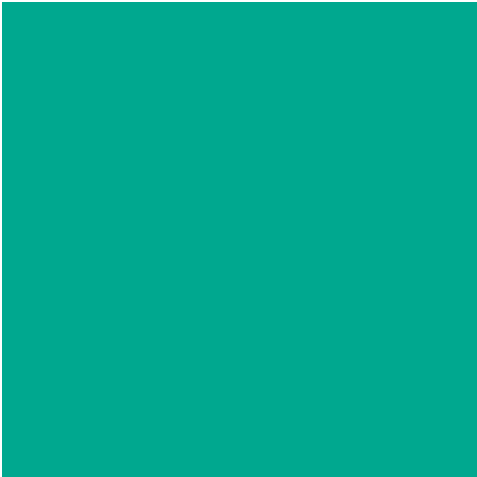
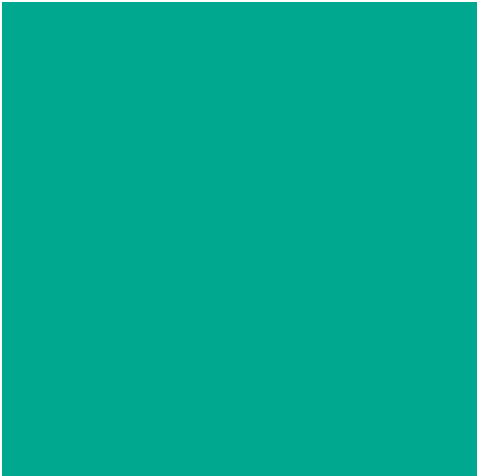
PROOF OF EVIDENCE

Site: Land at Sodbury Road,
Wickwar

For: South Gloucestershire Council

Appeal Ref: APP/P0119/W/23/3323836

Date: October 2023



Prepared by:

Liz Fitzgerald BA (Hons) Dip TP MRTPI
Director (Managing)

Barker Parry Town Planning Ltd

33 Bancroft, Hitchin, Herts SG5 1LA

T: 01462 420224 / E: office@barkerparry.co.uk



RTPI

Chartered Town Planners

QUALIFICATIONS AND EXPERIENCE

My name is Elizabeth Fitzgerald. I have a degree and diploma in town planning and over 19 years' experience as a practising planner. I have been a Member of the Royal Town Planning Institute (MRTPI) since 2005.

Most of my work has been in the public sector, with 13 years working for a variety of Local Authorities across England, including Chorley Borough Council, Richmondshire District Council, Stevenage Borough Council and Huntingdonshire District Council, including my last job as a Development Manager, responsible for the Development Management and Enforcement function at Harlow District Council. I moved into the private sector to work as a planning consultant in 2015. I was previously employed by the planning consultancy Vincent and Gorbing, before moving to Barker Parry in 2017.

INVOLVEMENT WITH THE PROJECT

I was instructed in September 2023 to assist with the planning evidence in respect of this appeal on behalf of South Gloucestershire Council (SGC).

I was not involved in the consideration of the proposal at application stage. However, I have reviewed the application history and process, along with the Committee's recommendations and ultimate decision by Members. I confirm that the opinions expressed in my evidence are my true and professional opinions

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1.0 **SCOPE OF EVIDENCE**

- 1.1 My evidence for this Inquiry draws upon the material comprising the planning application, the Appellant's Statement of Case which accompanied the initial appeal papers and the SGC Statement of Case. It should also be read in association with the Proofs of Evidence of Mr Robert Nicholson, which deals with heritage matters; and Ms Jane Jarvis which deals with landscape matters.
- 1.2 My evidence will consider the appeal scheme against relevant South Gloucestershire Council (SGC) Development Plan policies and supplementary planning documents, the NPPF, PPG and other guidance to which I will refer in relation to material considerations that apply.
- 1.3 I confirm that I have read the Committee Reports and note that the recommendation was finely balanced, such that Councillors were able to take a different view from the Officers recommendation and weigh matters differently.
- 1.4 I will consider all the factors that weigh into the planning balance, and I will provide an assessment of adverse impacts of the proposal and whether they significantly and demonstrably outweigh the public benefits of the scheme. I will consider the identified harm both individually and cumulatively and any potential mitigation that may overcome such harm, thus reaching my own conclusions.
- 1.5 At the time of writing, there are several Statements of Common Ground between the Appellant and SGC that remain in draft and discussions are ongoing.

2.0 **SITE AND SURROUNDINGS**

- 2.1 The Appeal Site measures approximately 7.89ha and is divided between 4 fields in agricultural use. The land has a varied topography ranging from 83-90mAOD although is generally flat with a shallow depression running North-South within the site. The boundaries are formed by a mix of hedgerows, some trees and areas without definition to a boundary. The southern boundary touches the junction at Frith Lane. A slither of land is to be retained in agricultural use to the east of the site, between it and the houses which front Sodbury Road.
- 2.2 The site, in part, abuts the B4060 Sodbury Road to the east. The proposal has two access points to serve the development, one located to the north of Poplar Lane junction and south of the Amberley Way mini roundabout. The other is to be south of the Horwood Lane junction.
- 2.3 The site is in Flood Zone 1 but the site's topography and central depression results in a potential surface water flooding risk. The existing culvert headwall that lies within the site drains the existing run-off from the B4060 Sodbury Road.
- 2.4 There are no Public Rights of Way that cross the site but several run nearby. The National Cycle Route 410 lies to the north of Wickwar and forms part of the Avon Cycleway, which connects to Bristol via the surrounding towns and villages.
- 2.5 There is a bus stop on Sodbury Road in the south eastern corner of the site, south of the southern access.
- 2.6 The site and its surroundings fall within the north-eastern extent of National Character Area 118 'Bristol, Avon Valleys and Ridges', which encompasses the

City of Bristol at its core and the surrounding area to the northeast, south and southwest – including Chew and Yeo valleys, Keynsham, Clevedon, Portishead and parts of the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty. The site is wholly situated within Landscape Character Area 5 'Wickwar Ridge and Vale', described briefly as *"a diverse undulating landscape covered with a mix of farmland, woodland and common."*

- 2.7 The site does not contain any heritage assets and lies outside the Wickwar Conservation Area, which is approximately 335m to the north of the site. The site does lie in the setting of the Grade II Listed South Farm (approximately 40m to the north) and the Grade II* Listed Frith Farm (approx. 440m to the southwest).
- 2.8 Nearby facilities within a 15-minute walk of the site include: a pub, coffee shop, social club, church, primary school and the Wickwar playing fields. Yate, Chipping Sodbury, Cromhall and Charfield are within a 10-minute drive.
- 2.9 The willow trees within the northern access point of the site are protected by a Tree Preservation Order.
- 2.10 A low voltage overhead transmission line crosses the site at the north and a high pressure gas pipeline is located in the southwest corner of the site.

3.0 **THE APPEAL PROPOSAL**

3.1 The application was made in outline for the following proposed development, which is now the subject of this appeal:

Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.

3.2 For clarity, all matters are proposed to be reserved. The northern and southern access points are proposed to be approved in detail as part of this Appeal.

3.3 Whilst the Appellant has submitted some parameter plans as part of the Design and Access Statement and Amended Design and Access Statement, a high level Illustrative Masterplan and Illustrative Landscaping Scheme, they do not propose that these be secured in any manner. Essentially, only the red line plan would be secured.

4.0 **APPLICATION PROCESS**

- 4.1 The application was submitted to SGC on 23 February 2022 and validated on the 21 March 2022 following the submission of a request for, and issue of, a screening opinion (CD 4.1).
- 4.2 Following the initial consultation, the Applicant, now Appellant, submitted amendments to the scheme in March 2023, which were then subject to their own consultation period. All consultation responses received are at Section 3 of the Core Documents list.
- 4.3 The Appellant opted to submit an appeal on 9 June 2023 against the non-determination of the application.
- 4.4 The Appeal was commenced, via the issue of a Start Letter, on 12 July 2023. The Local Planning Authority then proceeded to consider the application and determine what decision it would have reached on it had it retained jurisdiction over it.
- 4.5 The proposal was initially reported to the Strategic Sites Delivery Committee on the 3 August 2023. The Committee report was a balanced assessment of the proposal and recommended that, had the Authority remained as the determining body, they would have recommended approval subject to the completion of a S106 Agreement and appropriately worded planning conditions.
- 4.0 In undertaking the assessment of the Application, the Officer undertook the planning balance exercise and attributed weight to both the benefits and harm arising. The weighting categorisation used was: *limited, moderate, significant and substantial*. In respect of heritage harm alone, *great weight*

was attributed. I have adopted the same approach in this evidence and this has been used in the Statements of Common Ground.

4.1 Following a debate, Councillors moved and resolved that, should they have been the determining body, they would have refused the application on the following basis:

1) The adverse impacts of the proposal with regard to:

- *Landscape Harm (significant weight),*
- *Increase reliance on car borne transport (substantial weight),*
- *Loss of Grade 3 agricultural land (limited weight)*
- *Recreational pressure on SSSI (limited weight)*
- *Conflict with Spatial Strategy (significant weight)*
- *Harm to Wickwar Conservation Area (moderate weight),*
- *Less than substantial harm to South Farm (moderate weight)*
- *Less than substantial harm to Frith Farm (limited weight)*

significantly and demonstrably outweigh the benefits, which are:

- *Provision of housing (significant weight),*
- *Affordable housing (significant weight),*
- *Provision of self-build plots (significant weight),*
- *Provision of new jobs (moderate weight),*
- *Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) (limited weight)*

Therefore, applying paragraph 11(d)(ii) of the NPPF, planning permission should be refused.

2) The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure. Such

infrastructure shall include (but is not limited to) Affordable Housing; Public Transport; off-site highways works; Travel Plan measures; Education contributions to nursery, primary and secondary education and associated transport; Public Open Space; Community Infrastructure; A retail unit and Self-build/custom build homes. The proposal is therefore contrary to policy CS6 of the South Gloucestershire Core Strategy 2006-2027.

4.2 As this resolution was contrary to the Officer's recommendation, under the Council's Scheme of Delegation, the application was referred to the Spatial Planning Committee for a final decision. .

4.3 Following a debate on the merits of the scheme, Councillors again determined that had they retained jurisdiction over the application they would have refused it. The following was the unanimous resolution of the Committee:

1) The adverse impacts of the proposal with regard to:

- *Landscape Harm (significant weight),*
- *Increase reliance on car borne transport (substantial weight),*
- *Loss of Grade 3 agricultural land (limited weight)*
- *Recreational pressure on SSSI (limited weight)*
- *Conflict with Spatial Strategy (significant weight)*
- *Harm to Wickwar Conservation Area (moderate weight),*
- *Less than substantial harm to South Farm (great weight)*
- *Less than substantial harm to Frith Farm (great weight)*

significantly and demonstrably outweigh the benefits, which are:

- *Provision of housing (significant weight),*
- *Affordable housing (significant weight),*

- *Provision of self-build plots (significant weight),*
- *Provision of new jobs (limited weight),*
- *Other benefits (potential for a shop, redirected Public Right of Way,*
- *highway improvements and connections) (limited weight)*

Therefore, applying paragraph 11(d)(ii) of the NPPF, planning permission should be refused.

2) The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure. Such infrastructure shall include (but is not limited to) Affordable Housing; Public Transport; off-site highways works; Travel Plan measures; Education contributions to nursery, primary and secondary education and associated transport; Public Open Space; Community Infrastructure; A retail unit and Self-build/custom build homes. The proposal is therefore contrary to policy CS6 of the South Gloucestershire Core Strategy 2006-2027.

4.4 As set out in the Council's Statement of Case (paragraph 1.8), following legal advice the resolution was amended. The final putative reasons for refusal are:

1) The adverse impacts of the proposal with regard to:

- *Landscape Harm (significant weight),*
- *Increase reliance on car borne transport (substantial weight),*
- *Loss of Grade 3 agricultural land (limited weight)*
- *Recreational pressure on SSSI (limited weight)*
- *Conflict with Spatial Strategy (limited weight)*
- *Harm to Wickwar Conservation Area (great weight),*
- *Less than substantial harm to South Farm (great weight)*
- *Less than substantial harm to Frith Farm (great weight)*

significantly and demonstrably outweigh the benefits, which are:

- *Provision of housing (significant weight),*
- *Affordable housing (significant weight),*
- *Provision of self-build plots (significant weight),*
- *Provision of new jobs (limited weight),*
- *Other benefits (potential for a shop, redirected Public Right of Way,*
- *highway improvements and connections) (limited weight)*

Therefore, applying paragraph 11(d)(ii) of the NPPF, planning permission should be refused.

2) The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure. Such infrastructure shall include (but is not limited to) Affordable Housing; Public Transport; off-site highways works; Travel Plan measures; Education contributions to nursery, primary and secondary education and associated transport; Public Open Space; Community Infrastructure; A retail unit and Self-build/custom build homes. The proposal is therefore contrary to policy CS6 of the South Gloucestershire Core Strategy 2006-2027.

5.0 **PLANNING POLICY**

5.1 The Development Plan relevant to this appeal is comprised of the following:

- South Gloucestershire Local Plan Core Strategy (December 2013)
- South Gloucestershire Local Plan Policies, Sites and Places Plan (November 2017)

Development Plan

5.2 The relevant policies are listed at paragraphs 3.2 and 3.3 of the Council's Statement of Case.

5.3 Work has commenced on a new Local Plan for South Gloucestershire but is at an early stage. It therefore carries no weight in the consideration of this proposal.

Supplementary Documents

5.4 In addition to the Development Plan, the following supplementary guidance is relevant:

- The South Gloucestershire Design Checklist SPD (adopted)
- The South Gloucestershire Waste SPD (adopted)
- The South Gloucestershire Residential Parking Standards SPD (adopted)
- The South Gloucestershire Affordable Housing and Extra Care SPD (adopted)
- The South Gloucestershire Revised Landscape Character Assessment SPD (adopted)
- The South Gloucestershire CIL Charging Schedule and the CIL and S106 SPD (adopted)
- The South Gloucestershire Biodiversity Action Plan (adopted)

National Planning Policy Framework

- 5.5 The NPPF 2023 is a material consideration in the determination of this appeal and the following extracts are considered relevant:

Paragraph 7 Achieving sustainable development: The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.

Paragraph 9 of the NPPF highlights the active role that planning policies and decisions should take to guide development to reach sustainable solutions. It explains the need to take account of local circumstances, to achieve sustainable solutions that “...reflect the character needs and opportunities of each area.”

Paragraph 11 (d)(ii) The presumption in favour of sustainable development:

- 11 Plans and decisions should apply a presumption in favour of sustainable development.

For **decision-taking** this means:

- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 7:

The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in Paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and areas at risk of flooding or coastal change.

Footnote 8:

This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in Paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

Paragraph 12: The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

Paragraph 93:

93. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
 - d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Paragraphs 98-100: open space and recreation

98. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Paragraphs 104 and 105 deal with matters pertaining to sustainable transport, paragraph 105 in particular states that significant development should be focused on locations which are, or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.

Paragraph 112 states that the NPPF makes clear that applications for development should (amongst other things) (a) give priority first to pedestrian and cycle movements, ..and second – so far as possible – to facilitating access to high quality public transport... (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; (c) create places that are safe, secure and attractive ...

Paragraph 120 states Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

Paragraph 121 states that local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs

Paragraph 124: Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Paragraph 125: Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

Paragraph 126 “Achieving well-designed places” sets out policy on the creation of high quality, beautiful and sustainable buildings and places which is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The importance of the National Design Guide and the National Model Design Code are underlined in **Paragraph 128** of the NPPF. This paragraph also explains the importance of adopting local design guides to ensure the creation of *“beautiful and distinctive places with consistent high quality of design”*.

Paragraph 130 states that “Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

Paragraph 134: Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

Paragraph 199 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as set out in **Paragraph 203**. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 5.6 Reference will also be made to relevant extracts from National Planning Practice Guidance.

6.0 **PLANNING ANALYSIS**

6.1 The Local Planning Authority considered the application having regard to the Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004. In doing so the Planning Committee resolved to refuse the submission on the basis of the following matters which it considered significantly and demonstrably outweighed the benefits of the scheme:

- 1) Conflict with the spatial strategy of the Plan.
- 2) Landscape Harm.
- 3) Heritage Harm.
- 4) Car Borne Development.
- 5) Loss of agricultural land.
- 6) Impact on the SSSI.

6.2 Landscape and heritage harm are dealt with in detail within evidence provided by Mrs Jarvis and Mr Nicholson and I will cross refer to this evidence as appropriate.

6.3 In the first instance it is important to establish the planning basis upon which any decision should be taken, having regard to the Council's Housing Land Supply and Spatial Strategy. NPPF Paragraph 11(d) and associated footnotes advise that where:

"the policies which are most important for determining an application are out of date⁸, granting planning permission unless:

- i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or*

- ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

6.4 Policies are out of date when they are not consistent with the NPPF. Footnote 8 advises that policies are deemed to be out of date when the Local Planning Authority cannot demonstrate a five year supply of deliverable housing (with the appropriate buffer) or where the Housing Delivery Test indicates that the delivery of houses was substantially below the housing requirements over the last three years (i.e. less than 75%).

6.5 The Core Strategy was submitted prior to the publication of the 2012 NPPF. As the Core Strategy's housing requirement did not take account of the wider Bristol housing market area, the Examining Inspector set out the need for a review of the Core Strategy, and for the review and new plan to be in place by 2018. This review has not occurred and two previous attempts at a sub-region plan have not progressed. Whilst South Gloucestershire is progressing a new Local Plan that will ultimately replace both the Core Strategy and the Policies, Sites and Places Plan it remains at an early stage and does not therefore carry any weight. Having regard to the recent appeal decision in Thornbury and Old Sodbury (CD5.1 and 5.2), it is common ground that Policies CS5 and CS34 of the Core Strategy are out-of-date. It is common ground that the titled balance under paragraph 11(d)(ii) is engaged.

6.6 In respect of housing delivery, the Council have scored well in successive years against the Housing Delivery Test.

Year	Housing Delivery Test Result	Housing Delivery Test: Consequence
2018	131%	None
2019	134%	None
2020	125%	None
2021	133%	None

- 6.7 The Council have reported a 5-Year Housing Land Supply (5YHLS) since 2019, with the most recent AMR advising of a 5.35yr supply.

Year	5YHLS
2018	6.26yrs
2019	5.36 Amended 5.21
2020	5.28
2021	5.99
2022	5.35

- 6.8 In 2019 the Local Planning Authority acknowledged that the Core Strategy was more than 5 years old and on that basis the Council reviewed its housing need and supply of sites in accordance with Paragraph 74 of the NPPF. The associated footnote 39 advises:

".. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in the national planning guidance."

On this basis the annualised housing need figure changed from 1,460 to 1,503 dwellings per annum, hence the amended figures in 2019 above.

- 6.9 This figure has been adjusted year on year to reflect ongoing delivery and the shift from the 2014 census data to the 2021 census data. Therefore in considering the annualised requirement for dwellings within the administrative area, the Council have continually sought to ensure the figures are reviewed and up to date.

- 6.10 The Appellant has advised that they are challenging the Council's 5YHLS position. It has been confirmed that this will be dealt with by a roundtable discussion at the Inquiry. Accordingly, the Council's response on its 5YHLS position is set out in separate evidence. However for the purpose of this evidence suffice it to say that I have considered the sites in dispute and I am of the view that the Council do have a five year supply of sites as against its Housing Requirement calculated in accordance with the Standard Method. I consider the supply to be 5.32years.
- 6.11 The Appellant has sought to set out the requirements of CS15 and the associated housing delivery by the Local Authority back to 2006/07, placing great weight on the overall performance and suggesting that this is a material consideration in the determination of this appeal. In undertaking this exercise, the Appellant is affording weight to a Policy that has been agreed is out of date.
- 6.12 Policy CS15 is not considered to be a most important policy for the determination of this appeal, a position also agreed by the Appellant, either for determining this appeal or for considering the 5 year supply specifically.
- 6.13 Paragraph 74 and footnote 39 directs the Council to use the Standard Method for calculating the 5 year supply, which coincidentally coincides with the end of the Core Strategy plan period. The NPPF requires the use of the Standard Method is to accurately assess the housing need for a Council's area as opposed to using a housing requirement figure that is out-of-date.
- 6.14 The Standard Method makes provision for any historic under-delivery, as it is imbedded in the standard methodology assumptions through the affordability uplift. To treat any historic under-delivery as a material consideration would comprise double counting.

6.15 Regardless of the Council's position in respect of the 5YHLS, the importance of delivering housing is acknowledged and as such the delivery of housing is afforded significant weight in the planning balance.

6.16 Setting aside the 5YHLS position, consideration must be given to Paragraph 11di), the referenced assets of particular importance are set out within footnote 7 which states:

"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68 in chapter 16); and areas at risk of flooding or coastal change"

6.17 The development of the site will impact on two designated heritage assets, Grade II South Farm and the Grade II* Frith Farm.

6.18 As will be set out below, and within the Proof of Mr Nicholson, the impact on these designated heritage assets is considered to be less than substantial, and any public benefit of a proposal needs to be weighed against the harm, as set out in Paragraph 202.

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

- 6.19 I also consider whether the extent of the harm is sufficient to constitute a “clear reason” for refusal.
- 6.20 Accordingly, Paragraph 11d) and the associated tilted balance is not engaged, unless applying NPPF Paragraphs 200 – 202 the harm outweighs the public benefit NPPF Paragraphs 200 – 202 are satisfied (*Monkhill Ltd –v- SSCLG [2021] EWCA Civ 74 para 24 – CD5.28*).

Settlement Strategy and Development in Wickwar

- 6.21 Having regard to the two recent appeal decisions at Old Sodbury (CD5.2) and Thornbury (CD5.1), it is acknowledged that Policy CS5 and CS34 are out-of-date, such that development need not be constrained to defined village boundaries.
- 6.22 The village of Wickwar has a long history, including being referenced at Domesday in 1086. Whilst the village historically benefited from both the cloth and clay pipe trade, the only longstanding trade is the brewery. By 1975 the size of the village had remained largely unaltered with a decline in population to circa 680 people. Since that time, development has occurred in the southern and eastern parts of the village, largely in the early 1990’s. The extent of the Conservation Area largely reflects the historic medieval village, with the late 80’s and early 90’s development being apparent by virtue of their contrasting designs.
- 6.23 Further development has occurred in more recent years on the eastern side of Sodbury Road to the south of the village. Both developments, Land South of Poplar Lane and Land South of Horwood Lane, were granted outline planning permission at a time when the Local Planning Authority could not demonstrate a 5YHLS. Both developments provided an opportunity to continue the built form of the settlement on the eastern side of Sodbury Road, as a natural continuance of the settlement tapering to Pincots Lane.

- 6.24 It was acknowledged that some growth provided an opportunity for the village facilities to benefit from additional patronage and for the under-subscribed primary school to have additional pupils. However, there was concern expressed regarding the limited number and type of facilities available within Wickwar, the poor quality footpaths available to access those facilities and the need for access - daily, weekly or occasionally - to key services and facilities not available in Wickwar.
- 6.25 At the time the village had an operational small convenience store that incorporated a post office. Even considering the bus provision that was available at the time, which included the Service 84 provided by Stagecoach, it was considered that the available public transport was limited but would to a degree mitigate against the poor access to facilities such as a doctors surgery, larger convenience stores or formal indoor leisure facilities in Chipping Sodbury/Wotton or Yate. However overall it was considered that a large number of journeys, given the scale of each of the proposed developments and the number of new households that would be created (80 and 90 units) looking to access facilities such as the hospital, access to the rail network and employment would be made by car. Despite the provision of enhancements to infrastructure including a new bus stop and money to support transport to secondary school pupils, it was still concluded that the developments would be car borne and that this was a harm of the proposal.
- 6.26 In dealing with those applications, the Committee reports in both cases (PK16/4006/O (CD6.14) and PL17/4552/O (CD6.17)), officers noted that the public transport available was limited (90 minute service) and subsidised in nature, it was however available and provided access to some key facilities within either Wickwar or surrounding villages/towns. Contributions were made in both cases towards improved bus stop provision adjacent to the developments to ensure the bus was readily available to future occupiers to

maximise the attractiveness of the limited service. When undertaking the planning balance exercise, it was the delivery of housing, in the context of no 5YHLS, that weighed in favour of the proposal and outweighed the harm arising from the reliance on private vehicles to access to most services and facilities.

- 6.27 The cumulative development of 170 dwellings, on the eastern side of Sodbury Road, represents a 29.1% growth in the size of the settlement, over the 584 dwellings in existence at the time that the earlier application was considered, with no additional community facilities or services provided.
- 6.28 In contrast there has been no such formal or planned growth on the western side of Sodbury Road. Built form remains more sporadic and linear in its form, with a clear break in built form between the settlement itself and the linear development along Sodbury Road.
- 6.29 The village remains of a medium size but since the consideration of the development on the eastern side of Sodbury Road, the access to facilities has diminished. The village no longer benefits from a village shop and post office, whilst the bus service only serves Wickwar 6 times per day, resulting in an unattractive service to access facilities in Chipping Sodbury/Wotton or Yate.
- 6.30 This proposed development, when combined with the recent developments on the eastern side of Sodbury Road, would result in a 60% uplift in the number of households within Wickwar. It is considered that this would increase the village to such an extent that it would become a large village or small town, with no improvement to the facilities available within the settlement, thus increasing car dominance in the rural area and promoting unsustainable travel behaviours.

- 6.31 The proposed development, unlike development to the east, is disconnected from the core of the village. The northern access alone is circa 350m from the southern edge of the village, and the furthest southern access and development beyond are in excess of 780m away. It is essentially a backland site that protrudes into open countryside, with only the northern access and allotments visible at the top of the site when viewed from Sodbury Road, with some frontage development to the southern access point. It is further divorced from the rear of the existing properties fronting Sodbury Road by a slither of land that falls outside the application boundary. It has subsequently come to light that the properties fronting Sodbury Road have been either sold or gifted parts of the slither of land to enable them to either extend their gardens or retain control of some land directly to the rear of their properties.
- 6.32 In addition, as a result of the proposed configuration of the development parcels shown on the illustrative site layout, the development area expands in width from the north to the south, resulting in a development that is greater in depth from Sodbury Road at the south than it is at the north. This is at odds with the planned tapering, mentioned above, that occurs on the eastern side of Sodbury Road. This results in a development that erodes the character and appearance of the area to a significantly greater extent upon approach into the settlement, with a much wider expanse of development in depth from Sodbury Road and only retained hedgerow proposed as the landscaped edge, by contrast, development on the eastern side of Sodbury tapers to the southern part of the site and has incorporated woodland planting on the southern boundary of the site to retain a rural feel upon approach into the village. As a consequence of the proposed development parcels and indicative landscape strategy of the proposal fails to reflect the established character of this part, to its detriment.
- 6.33 Whilst the overall settlement strategy maybe out-of-date this does not create a carte blanche for development beyond the settlement boundaries. Any

development outside these boundaries must be in keeping with the evolution of the settlement and its historic form and subsequent development. I consider that the proposals, given their location, configuration, scale and depth, will always appear as an isolated backland development.

- 6.34 The Appellant has proposed, through the draft S106 Agreement, a minimum area (0.15 ha) of retail land indicatively shown to the southern entrance of the site. By commencement of 30% of the dwellings (54 units), the land must be provided as a serviced site and approval obtained from the Council of a marketing scheme which must continue for a period of 24 months. If no agreement for an operator to build and operate a store is in place at the end of that period then a shell building is to be built and marketed for another 12 months. Thereafter if no agreement with an operator to take up the building is reached the building can be put to an alternative use.
- 6.35 Moreover I have concerns that the location of a retail store within the appeal site will undermine the village and its settlement pattern. The location of a retail shop over approximately 730m from the edge of the village and away from its limited services and facilities will, in my view, dissuade people from linked trips to the centre of the village. Such linked trips would encourage and enliven the vitality of its centre and the value of it as a Conservation Area, whilst the proposed location would be largely accessed via the private car as a destination trip. Whilst residents of the proposed development and potentially some from the newer development on the eastern side of Sodbury Road may walk to the shop, it is considered that its location on the edge of the Village, adjacent to the road, will lead to car borne trips from the wider settlement. It is assumed that in order for a shop to be viable and deliverable, it will need to benefit from more patronage than is solely available from nearby properties, hence the location proposed on the site, where a shop would be visible to the wider community.

- 6.36 Moreover, there is no guarantee that this retail unit will be delivered. Delivering a retail unit as a serviced site is unusual for a development of this scale. In my experience, usually a shell and core building would be provided at the outset that is then either purchased or leased by the retail provider. As explained above the S106 Agreement has provision for a 24 month marketing strategy to commence prior to the commencement of the 54th dwelling. Based on an average build out of 55 dwellings per annum (Lichfields: Start to Finish second edition), this development would be almost complete prior to that marketing period ending, thus travel and shopping patterns will already have been established for those properties already occupied, early delivery of facilities seeks to establish behaviour patterns from the outset. Further the S106 has been amended to include a clause allowing the land to be subject to a further permission for an alternative use, should an end user not be found which demonstrates a lack of confidence in the take up of this serviced site/building.
- 6.37 Presently it can be seen that there is no agreement with a retail provider to take up the retail land nor build and operate such a store. Nor is there any viability assessment to demonstrate that any retail operator would wish to do so. There can be no confidence that such a store would in fact be provided and it can only attract little if any weight in my view, not the significant weight attributed to it in the Appellant's Statement of Case (para 5.114).
- 6.38 Overall, setting aside settlement boundaries and settlement hierarchy, this proposal will undermine the village of Wickwar, both in its evolution and its scale without any ability to secure appropriate mitigations. It will also set a precedent and likely lead to increased pressure on the infilling of land between the Appeal site and the southern edge of the settlement, leading to further unsustainable development. The proposal is considered to be contrary to paragraphs 79, 105 and 130 of the NPPF.

Affordable Housing and Housing Mix

- 6.39 Attached at **Appendix 1** is a note from the Council's Housing Enabling Programme Manager, Ms Kerry Cox, on affordable housing need and projected supply.
- 6.40 In summary, the West of England Strategic Housing Market Assessment (SHMA) 2009 (CD4.32), that underpinned the Core Strategy 2013 and which the Appellant rely on for an affordable housing need of 903dpa is out-of-date and no longer reflects the South Gloucestershire affordable housing need.
- 6.41 Since the production of this 2009 SHMA two further SHMA's have been produced (2015 and 2019) and used in the determination of planning applications. Both these documents identified a need of approximately 300 affordable dwellings per annum.
- 6.42 Having regard to the guidance within the NPPF 2019 and NPPG, the SHMA was further updated in 2021, now known as the LHNA 2021 (CD4.33). This represents the most up to date position for the West of England and South Gloucestershire. The LHNA considers affordable housing need over two periods: 2020-2035 and the longer period 2020-2040. In calculating the need for the District, the figures include both the backlog or shortfall in delivery of affordable housing across the District and the projected need to the end of the assessment period.
- 6.43 It is not therefore necessary to assess any historic shortfall as this is accounted for within the total amount of, residual and forecast, dwellings required over the assessment period.

6.44 These figures are calculated as:

- 6,165 affordable homes for South Gloucestershire in the plan period 2020-35, or approximately **411 homes per annum**.

Or

- 7,485 affordable homes for South Gloucestershire in the plan period 2020-40, or approximately **370 affordable homes per annum**.

6.45 The AMR 2022 advises that the following levels of affordable housing have been delivered in the preceding 5 years:

2017/2018	368
2018/2019	624
2019/2020	565
2020/2021	403
2021/2022	562

6.46 Based on the 5YHLS, the Council is anticipating the delivery of in excess of 7,650 dwellings, which at 35% affordable delivery is in excess of 2,670 affordable dwellings, or 535 per annum. It can be seen that when compared against the affordable housing need dpa figure for the relevant period the need is being met.

6.47 The conservative forecasts held by the Council anticipate a delivery of approximately 2,300 dwellings in that 5 year period, an average of 470 affordable dwellings per annum.

6.48 These figures relate solely to the delivery of new build projected delivery based on S106 requirements. This doesn't include additional delivery brought forward by Registered Providers (RPs) on their affordable-led schemes, that will invariably deliver greater proportions of affordable

- housing than required by the permission or policy, or fall below the threshold for affordable housing delivery (i.e. not major development). In addition, some RPs have also purchased properties resulting from Prior Approval conversions, which are similarly exempt from affordable housing delivery. All of these additional properties ensure that housing delivery in the District is in excess of that anticipated through s106 delivery alone. These excluded properties are harder to quantify on an annual basis so are excluded from anticipated delivery.
- 6.49 Regardless of this successful delivery of affordable housing and the positive outlook for continued delivery over the next 5 years, the Council places significant weight in favour of the delivery of a policy compliant scheme in respect of affordable housing.
- 6.50 The proposal incorporates the provision of 35% affordable housing delivery within the draft S106 Agreement, accordingly, it would comply with part of Policy CS18 of the Core Strategy and, despite the fact the need is being met, attracts significant weight. The Appellant's Statement of Case also gives significant weight to this provision.
- 6.51 Policy CS17 of the Core Strategy advises that on sites such as this, i.e. not a strategic site, the mix of housing should contribute to providing a choice of tenure and type, having regard to the existing mix of dwellings in the locality, along with the character and relative accessibility of the location.
- 6.52 The supporting policy text (para 10.25) acknowledges that smaller developments tend to provide a greater proportion of 3 and 4 bed properties, with 4+ bed properties also provided through extensions to existing properties. The policy therefore anticipates smaller family homes to be accommodated on sites such as this Appeal Site.

- 6.53 The Appellant has not provided any indicative housing mix for the development proposals on this site. The demonstration layout contained within the Amended Design and Access Statement suggests a large proportion of detached and possibly semi-detached dwellings are anticipated to be delivered.
- 6.54 At this time, from the information submitted, it is considered that the Appellant has failed to demonstrate that an appropriate housing mix can be delivered on this site and reflect the character of the area, contrary to policies CS17 and CS18.

Landscape Harm & Urban Design

- 6.55 Matters pertaining to Landscape impact are dealt with by my colleague Jane Jarvis in her proof of evidence, I do not intend to rehearse those points.
- 6.56 The landscape setting of the site is particularly open, with many of the boundaries of the site being defined by hedgerows with intermittent trees. A group of four willow trees straddle the proposed northern access location, these willow trees are subject to a Tree Preservation Order. Two are stated by the Appellant to be removed to create the northern access.
- 6.57 The Appellant has submitted a revised Illustrative Masterplan alongside the Appeal; an updated Landscape Strategy was received on the 26 September 2023, comprising amendments to the layout to reflect the revised Illustrative Masterplan but also further landscape changes not previously seen.
- 6.58 The Appellant has clearly indicated that they do not want any decision to be constrained by any parameter plans or the illustrative masterplan. They wish any permission to be constrained to the red line plan and access plans.

- 6.59 This approach leaves consideration of a worst case scenario only. The Appellant has failed to demonstrate that the proposed 180 dwellings (accepting the description says 'up to') can physically be accommodated on this site, together with delivery of robust landscaping, to avoid significant harm to the character of the area.
- 6.60 In dealing with the Thornbury case, the Inspector advised at paragraph 154 (CD5.1):
- "It is relevant to note that the application is an outline proposal for "up to" 595 dwellings. Whilst it is possible that a lower number could be proposed at a later stage, no evidence has been given that this is intended or likely. In such circumstances, the Council would not be in a position to require a reduction at reserved matters stage."*
- 6.61 It is therefore entirely appropriate that the decision maker should have sufficient detail to ascertain whether the 180 dwellings proposed could be accommodated in a reasonable and appropriate manner given the rural setting of the Appeal site.
- 6.62 In reviewing the demonstration layout within the Amended Design and Access Statement (page 81) (CD2.2) it appears that only circa 155 dwellings can be accommodated albeit in a manner that is not reflective of the rural setting. This quantum is indicative of the documentation submitted by the Appellant in respect of the Call for Sites process associated with the emerging Local Plan, whereby the Appellant has indicated a capacity of 155 dwellings.
- 6.63 The Appellant has now provided an updated version of the demonstration layout, now entitled Illustrative layout – Option B (CD6.12). Whilst the number of units has increased (currently 178 dwellings) it is noticeable that the size of the units appears to have decreased resulting in a more dense

form of development, particularly along the southern boundary, a reliance on frontage parking and it would appear that not all properties benefit from parking. Further, the proposed shop is only shown as circa 300m², some 200m² smaller than proposed as part of the submission.

- 6.64 As can be seen in Ms Jarvis' evidence at paragraphs 2.25, 2.26 and 3.5-3.11, there is a proportionally larger built footprint, set in a denser form already proposed on this site when compared to the developments on the eastern side of Sodbury Road, made more dense when 180 dwellings are accurately shown. Whilst the green infrastructure is proposed to be located to the periphery of the site, there is little information provided that demonstrates how this landscaping will appropriately mitigate against impacts on local and medium distance views from the wider rural area and public rights of way. As can be seen in the below image, the Linden Homes development on the eastern side of Sodbury Road is highly visible from the wider footpath network near Frith Farm.
- 6.65 With 2.5 storey dwellings proposed on the highest land within the site (Amended DAS page 59 CD2.2), enhanced hedgerows are not going to obscure or even soften the appearance of an urban edge of predominately 2.5 storey dwelling development.



Image 1: View from Frith Farm

- 6.66 Whilst the Appellant does not wish any parameter plans to be secured, the Amended Design and Access Statement (CD2.2) clearly demonstrates that the Appellant has a scheme largely worked up, and in urban design terms these details must be considered, as they are the only information submitted that demonstrates the Appellants intent behind the accommodation of 180 dwellings.
- 6.67 The Appellant is proposing the site be broken into 4 key character areas: Orchard View, Development Core, Southern Gateway and Green Edge. The demonstration layout within Amended DAS shows little variety in the massing of the different character areas, with the exception of the Development Core which is dominated by frontage parking and hard surfacing. This layout demonstrates a lack of understanding of the character of the site and its rural context. The developments on the eastern side of Sodbury Road have both sought to deliver strong landscape buffers around their outward facing perimeters together with housing set back behind a wide and articulated green frontage along Sodbury Road, with linking green corridors to the rural edge beyond the development. This proposal fails to

- provide anything akin to this level of landscape and green infrastructure, but instead proposes a road heavy, dense layout.
- 6.68 The approach to the village will now become a retail unit surrounded in a swathe of car parking, should the unit come forward, or be residential development with a lack of frontage landscaping to alleviate the site frontage, with the northern access dominated by the proposed allotments. Whilst the principle of allotments is welcomed, they come with sheds, random temporary structures, and fencing that is not attractive. Cumulatively this creates an urban development in a rural location.
- 6.69 The loss of protected trees adjacent to the northern access is also detrimental to the visual amenities of the area and only occurs as a result of the proposed access arrangement. The Tree Officer objected to the proposed development on the basis of the loss of these trees (CD3.11 and 3.12). The Arboricultural Report (CD1.9) identifies the trees as Category B and in a fair condition. There is no reason to remove these trees other than to facilitate this development. The proposal is considered to fail to have regard to the character of its setting.
- 6.70 It is fully appreciated that matters of layout and design are reserved for later consideration, however, there remains a need for any proposal to demonstrate that it can be reasonably accommodated on a site whilst reflecting the character of the location. The Appellant has failed to demonstrate that 180 dwellings can be successfully accommodated on this Appeal site.
- 6.71 Moreover, Jane Jarvis' evidence shows that the proposal will have significant adverse landscape impacts and will detrimentally affect the character and appearance of the area. and in her view this harm should attract significant weight – I agree.

Heritage Harm

6.72 Matters of heritage impact are dealt with by my colleague Robert Nicholson in his evidence. He deals with the relationship of the site with the Conservation Area and the two nearby listed buildings, South Farm and Frith Farm.

6.73 Whilst Mr Nicholson reasonably concludes that there is no harm to the Conservation Area, regard must also be given to the character and appearance of the area which is identified as a main issue in this appeal. In particular those elements that contribute to the character and appearance of the area outside the Conservation Area, in particular the stone walls that are prevalent through the village.

6.74 The Wickwar Conservation Area Advice Note SPG (CD4.6) page 3 sets out the important features of the Conservation Area. These include:

Stone boundary walls - are important features providing enclosure and permance [sic]

6.75 Unlike the eastern side of Sodbury Road, there is a stone boundary wall which is almost continuous from the core of the Conservation Area to outside that area, up to the proposed northern access to the appeal site on the western side of the road. I consider that this wall, proposed (in part) for removal, is a built element that contributes to the character and appearance of Wickwar along this part of Sodbury Road and, as Mr Nicholson identifies, this could represent a non-designated heritage asset. In contrast, the eastern side has a limited extent of retained wall, ceasing some 175m north of the proposed site access point.

- 6.76 The proposed northern access will require the removal of circa 65m of this stone wall, which is the furthest remaining section of the wall from the Conservation Area.
- 6.77 It is common ground that the Conservation Area Advice Note sets out the elements considered to be of 'special interest' to the Conservation Area. The Note not only identifies stone walls as being of significance, it also identifies as part of the enhancement strategy that the stone walls should be repaired and conserved. As this stone wall, proposed for removal, is a continuation of a feature considered to be of special interest within the Conservation Area, it is hard to see why it would not be a built element that contributes to the character and appearance of Wickwar more generally.
- 6.78 In my view the removal of this section of wall, together with the Willow Trees that are behind it and its replacement with a vehicular access to service a modern housing estate, will have a detrimental impact on the character and appearance of this part of Wickwar which should be weighed as an adverse impact in the planning balance.
- 6.79 The position in respect of South Farm is an agreed matter between both parties. It is agreed that there will be an adverse impact on the setting of Grade II listed South Farm that will cause less than substantial harm to the significance of this designated asset and that this harm attracts great weight against the proposal. Mr Nicholson sets out the impact on the setting of the Farmhouse in his evidence at paragraphs 5.2 – 5.9. He highlights that the line of mature willow trees, two of which are proposed to be removed, help soften and green the views in the immediate vicinity whilst the stone wall makes a contribution to the character of the locality. In terms of the Farmhouse however, the impact will be largely felt to the rear of the property, with harm being categorised as towards the lower end of 'less than substantial' harm.

6.80 Mr Nicholson deals with Frith Farm at paragraphs 5.10 – 5.34 of his evidence. The impact on this Farmhouse is not agreed. The Local Planning Authority considers the impact falls within the 'less than substantial' category, whilst the Appellant considers there to be no harm to this property.

6.81 As can be seen, Mr Nicholson considers that there is an impact to the significance of Frith Farm due to the harm caused to its setting. Currently the property benefits from a rural character with limited views of the more recent development on the eastern side of Sodbury Road. The character therefore remains agricultural and rural in its nature. Any development on the Appeal Site will result in a discernible change in the landscape character and relationship between Frith Farm and its rural setting, such that it would be harmful.

6.82 It is considered that the proposal must be assessed in accordance with Paragraph 202 and 203 of the NPPF, whereby a public benefit is required to overcome the resultant harm. This will be considered as part of the planning balancing exercise.

Transport Sustainability

6.83 The NPPF makes it clear that significant development should be focussed on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. These sentiments are reflected in Development Plan Policies CS 8 and PSP11. Wickwar would see a cumulative growth of the settlement (including the recent developments on the eastern side of Sodbury Road) of 60%. It has limited services and facilities and cannot support an effective and viable bus service. Any development in Wickwar will be essentially car borne even if a limited bus service can be supported, which is extremely unlikely.

6.84 Until April 2023, Wickwar was served by the No. 84/85 bus service. The bus service was essentially one bus going in each direction between Wooton under Edge and Yate, serving villages such as Wickwar, Cromhall and Hawkesbury. This service operated on a 120min circular service Monday – Saturday (**Appendix 2**). The officers' reports in relation to the two developments on the eastern side of Sodbury Road, which in combination is similar to the level of development proposed here, stated in relation to this level of service that *"opportunities to use public transport are therefore available but limited but would to a degree mitigate against the poor access to some facilities"* whilst going on to conclude that a large number of journeys would be by car and that reliance on the motor vehicle to access facilities is a harm that results from development in Wickwar. I agree.

6.85 This bus service pre-2023 was provided by Stagecoach and funded by the West of England Combined Authority (WECA). At the onset of the Pandemic, the number of bus services funded by WECA increased to ensure ongoing provision. In January 2023 WECA undertook a review of the bus provision within the region and identified some serious ongoing challenges faced by the bus market in the West of England.

- Covid recovery - Passenger numbers have not fully recovered from the pandemic and remain at between 75 and 80% of pre-Covid levels. Government bus recovery grant – this is due to end on 31 March 2023 which will put further pressure on the network.
- The driver shortage - this remains the biggest barrier to growth and undermines the reliability of services. Whilst driver numbers are increasing very slowly the region is still short by around 250 drivers resulting in the withdrawal of routes. Ad-hoc cancellations due to driver shortages have undermined reliability and generated serious frustration for the public.
- Inflation – has been, and is forecasted to continue through 2023, to be above established norms, at rates last seen in the 1980's. This has had a

- detrimental impact on the commercial viability of services primarily through rising fuel and wage costs for operators. Value for money is becoming increasingly difficult to demonstrate in many parts of the region and an alternative innovative model for a declining market is needed. (Extract Committee Report **Appendix 3**)

- 6.86 As a result of these issues, not all funding could be retained and the 84/85 route lost its ongoing funding. Effectively the service was terminated in April 2023.
- 6.87 Following a change in Administration in May 2023, after the local elections, South Gloucestershire Council sought to source funding from other Council expenditures to provide a limited life extension to the 84/85 service. Whilst the matter was being considered by the Administration, the Council agreed a limited extension with Stagecoach until 3rd June 2023. Stagecoach were approached in May 2023 to ascertain if they would be willing to extend the service delivery for a further 3-4 months following the June 2023 initial extension.
- 6.88 On the 18 May 2023, Stagecoach advised the Council that *"with the current vehicle and driver plan the extension of this contract will likely cause too much pressure on the other contracts we operate and therefore risk service delivery"*. (**Appendix 4**)
- 6.89 In May 2023 the Council took an urgent decision to fund the ongoing delivery of the 84/85 service until April 2024 (**Appendix 5**). Following the withdrawal of Stagecoach, other bus companies operating in the area were approached but none opted to tender for the service. The Big Lemon bus company, operating in Bristol did however come forward with a revised and reduced service offer. The timetable now limits the stops within the village to 5 times a day, with none comfortably fitting the 9-5 office work pattern and only one

- opportunity to get into Yate and back to the village once on a Saturday.
(CD6.19)
- 6.90 The Big Lemon service is only funded until April 2024.
- 6.91 Additionally within the village is the Dynamic Demand Responsive Transport service (DDRT). DDRT is a flexible service that requires advanced booking, accessed through telephone, website or apps, with a 1 hour service level. The service has been funded for 2years by the Bus Service Improvement Plan (BSIP) and the Future Transport Zones funding streams from the Department of Transport. The DDRT is essentially a trial that is being monitored for its level of success or otherwise. The first data sets are only just being assessed and are not yet available. Funding is in place until April 2025 and at this time there is no indication of the intended continuation of the service, its success or any further Government funding. The DDRT is run on an almost regional basis, so cannot be simply applied to a smaller area due to the costs and administration required.
- 6.92 This leaves Wickwar and the surrounding villages in a precarious position at present, there will be no 84/85 bus service from April 2024 and the DDRT will cease in April 2025.
- 6.93 By the time this proposed development would start delivering houses, assuming the Appeal is allowed, there is a realistic prospect that the existing limited service will have ceased and there will be no bus service provision within the area.
- 6.94 It was concluded that, even with the pre-April 2023 level of bus provision, development in Wickwar would be essentially car borne. It can only reasonably be concluded that the Appeal proposal with no bus provision will

- be almost entirely reliant on the private car and therefore a car-borne development.
- 6.95 WECA have sought a contribution of £450,000 over 5 years to fund the ongoing delivery of the 84/85 service, whilst the Appellant has proposed an entirely new bus route that they advise will be commercially viable and therefore offer a nominal contribution of £50,000 per year for 5 years, with additional funding of £150,000 towards personal travel planning.
- 6.96 In short, neither contribution offers a realistic opportunity to make the development less dependant on the car in the long term. Even if the level of provision could be returned to the level pre-April 2023, it will still be a car borne development. The fact that it is highly unlikely that a bus service will be provided merely exacerbates that.
- 6.97 The contribution sought by WECA is based on a previous tender by Stagecoach in 2022, so likely to under-estimate the costs of delivery today given inflation levels, and is only to provide funding for 5 years. The current situation would then arise again after that 5 year period, with both WECA and SGC being left to try and fund the route. Recent history suggests that this will be difficult at the very least.
- 6.98 The suggested alternative bus route provided by the Appellant has a number of flaws. Aside from excluding several villages that are currently served, it would be left to WECA to try and find a bus company to deliver the route on the basis of commerciality, further even if it could be provided, it would not result in any development that was materially different to the pre-April 2023 service, whereby the Council concluded that the development would still be car borne when considering the proposal on the east side of Sodbury Road. The Appellant has not provided any evidence to suggest that a bus company

- would be willing to take the alternative service on, or that they would do it on a commercial basis. It is purely hypothetical.
- 6.99 As seen from the evidence above, Stagecoach were offered the opportunity to continue with the fully funded 84/85 service and declined as they would put their other services at risk. Other than The Big Lemon, no other bus company that currently operates in the area were willing to take on an existing service that has funding associated with it.
- 6.100 There is no evidence to suggest that any bus company would be willing to trial a new bus route on a commercial basis, when history has shown that most of the rural settlement services are funded and commercial services have failed in recent years. Essentially why would a bus company take a risk on a commercial service that has not been trialled and may not be viable, when they won't take on a funded service?
- 6.101 The ability to deliver bus services is further compounded by the shortage in bus drivers. The shortage of drivers is a National issue, with 1 in 10 bus driver positions vacant in the UK (**Appendix 6**). As can be seen in the attached articles, bus companies are offering significant joining bonuses and salary increases in order to attract people into the job. With the servicing of existing routes already being stretched and subject to delays and cancellations, the hypothetical provision of a new route has a real world issue associated with resourcing.
- 6.102 The Appellant's Technical Note on the proposed alternative bus route (CD7.4) suggests that an alternative route can be provided with a 30min service in peak hours reducing to 1hr in interpeak periods, which will result in a viable bus service, generating a profit of circa £144,000 per annum.

6.103 The Council has instructed WSP to review and comment on the technical note, to ascertain how realistic the proposals are. The full report is available at **Appendix 7**. In summary, there are elements of the proposal that can be supported, but in general terms:

- The anticipated patronage is over exaggerated, with levels almost trebling with no evidence to support the position. Further the anticipated commuter trips are over estimated, with the figures not being evidenced even when assessed against their own Transport Assessment. When the patronage figures are broken down the estimated trips per year would be less than 20% of the Appellant's estimate.
- The assumed yearly revenue is more realistically in the region of £320,000, approximately 1/5 of that estimated by the Appellant.
- The operating costs are likely to be approximately 4.5x the existing service costs, in the region of £834,000.

6.104 The conclusion is that any service of this nature would likely run at a deficit of approximately £448,000 per annum. This demonstrates that the alternative bus proposal proposed by the Appellant is entirely hypothetical and lacks a robust methodology for demonstrating viability.

6.105 Whilst the WECA contribution is the most likely to ensure an ongoing bus service to Wickwar, as it is a tried and tested option, it is only funded for 5 years and therefore has a high risk of being cancelled after funding is spent.

6.106 The Appellant's proposal is entirely hypothetical and as there is no evidence that any provider would take the service on, or have the resources available to do so. In any event this suggested alternative would not make the site sustainable as it would simply provide levels of bus provision similar to the pre-April 2023 levels which would still produce a car borne development because of the lack of facilities in Wickwar.

- 6.107 The only way the Appellant's bus route suggestion could attract any weight would be if the Appellant were to seek to deliver the service themselves, in association with a bus provider, underwritten until such time as the bus route proved viable. This is not proposed.
- 6.108 Ultimately, whilst a temporary measure to provide at least some level of bus service may be achievable, there is no long-term solution for delivering a bus service serving Wickwar and by association the proposed development.
- 6.109 Before works on this proposed development have even commenced, Wickwar is unlikely to have a bus service, this is based on the time periods associated with obtaining an appeal decision, then submitting and having determined a reserved matters application and any pre-commencement conditions.
- 6.110 As a consequence of the position in respect of bus infrastructure and the questionable delivery of the retail unit discussed above, the content of the draft Travel Plan (CD 1.6) must be disregarded. The document places a significant emphasis on outdated information pertaining to bus services within the village and seeks to achieve a +4% from the private car to the bus. Even were such a shift to be achievable which I very much doubt given the modal split in the Appellant's Transport Assessment which shows 1.6% using a bus it would still not provide any material shift away from use of the private car. Clearly with no bus service in the area even these levels will not be achievable.
- 6.111 Whether in the short or medium term, this proposed development will be unsustainable in transport terms and contrary to policy CS8 of the Core Strategy, PSP 11 of the Policies Sites and Places Plan and the transport

accessibility objectives of the NPPF. I agree that this harm is serious and should attract substantial weight.

Agricultural Land Classification

6.112 There are a number of Natural England sources that show the Agricultural Land Classification of land across England.

6.113 The most commonly used source for the South West is the Agricultural Land Classification Map South West Region (ALC006). It is designed to be used for strategic purposes. Shown in green on the map is the Grade 3 land. The map does not divide the land into 3a or 3b classifications:



Image 2: Extract from the Agricultural Land Classification Map South West Region (ALC006)

6.114 As can be seen from the extract everything around Wickwar is grade 3 land.

6.115 The Agricultural Land Classification Post 1988, which contains polygons showing 5 agricultural land classes plus classifications for urban and non-agricultural land, shows the site at Grade 4.

6.116 Separately we have the Provisional Agricultural Land Classification which advises that it *"provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning*

system. It helps underpin the principles of sustainable development." This map also shows the site as grade 3, as with the extract above.

6.117 It is clear that the site is either grade 3 or 4 agricultural land, with two of the three showing the land as grade 3. Of note, only the Provisional Agricultural Land Classification makes reference to the use of the data for planning purposes, it is therefore suggested that this is the most relevant for considering land classification. The land appears to have been continually farmed, presumably by those farming from South Farm and the associated agricultural buildings adjacent to the Appeal site. There is no suggestion within the Application or Appeal submission that this land is not productive agricultural land as part of the wider holding. It is therefore evident that the proposal will result in the loss of 7.86ha of productive agricultural land that will not be replaced.

6.118 Accordingly, it is considered that the loss of this land should be weighed in the planning balance overall as a harm albeit of limited weight.

Recreational Pressure on the SSSI

6.119 Natural England, in their consultation comments of the 11 August 2022 (CD3.33), deferred comments on the impact on the Lower Wood SSSI to the Gloucestershire Wildlife Trust (GWT).

6.120 The GWT provided additional comments on 21 July 2023 (CD3.31). It advised that regardless of the quality of on-site landscaping delivered or the access to the surrounding PROW network, residents will naturally seek out more *"visually and ecologically interesting landscapes"*. In order to mitigate concerns regarding additional pressures on the Lower Woods SSSI, a contribution towards soft and hard improvements would be reasonable.

- 6.121 In a revision to the draft S106 Agreement, a contribution of £34,740.00 towards the Lower Woods Reserve has been proposed. This contribution has not been discussed with the Local Planning Authority, accordingly, the GWT has been contacted for confirmation as to whether this would resolve their concerns.
- 6.122 GWT has advised that they received information from the Appellant on the evening of the 22 September 2023 and have yet to review and comment on the acceptability of the proposal. It is unlikely to be able to review it until after evidence is due for submission. An update on this position will be provided as soon as it is available.

7.0 **PLANNING BALANCE**

7.1 The planning balance is ultimately a matter of judgement for the decision maker. The Inspector will obviously need to reach his own conclusions, but the following is how I believe the Inspector should approach the determination of this appeal.

The Decision Making Framework

7.2 I have taken guidance in applying the planning balance and the application of NPPF Paragraph 11d from the 15 stage test set out by Holgate J in Monkhill Ltd v SSHCLG [2019] EWHC 1993 (Admin) (CD5.27) , as endorsed by the Court of Appeal in Monkhill Ltd v SSCLG [2021] EWCA Civ 74. (CD5.28)

7.3 It is the position of the Local Planning Authority that a 5YHLS position exists (5.32yrs) and that the Housing Delivery Test has been met in all reported years.

7.4 It is however agreed that policies CS5 and CS34 are out-of-date and accordingly Paragraph 11 of the NPPF is engaged.

7.5 This position would be predicated on footnote 7 being overcome and not presenting a clear reason for refusal.

7.6 In this case, the impact on designated heritage assets is at the lower level of 'less than substantial harm', resulting in an irrevocable loss of the setting to these buildings. An assessment of the public benefits of the proposal must therefore occur.

7.7 In considering the benefits of the proposed development, the Council afforded the following weight to the benefits:

- Provision of housing – significant weight,
- Affordable housing – significant weight,
- Provision of self-build plots – significant weight,
- Provision of new jobs – limited weight,
- Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) – limited weight

7.8 In undertaking my own assessment of the proposals, I agree with the approach taken by the Council to weighting. My only deviation is the consideration of market housing, affordable housing and self-build as one entity i.e. the provision of housing, to which I afford significant weight.

7.9 In light of the weight afforded to these benefits, with less than substantial harm arising at the lower end of the spectrum. Even though this harm attracts great weight, I do not consider that the heritage impact in isolation presents a clear reason for refusal for the purposes of Paragraph 11d(i).

7.10 The conclusion that heritage matters do not provide a clear reason for refusal engages the presumption in favour of sustainable development and the tilted balance.

7.11 In undertaking the planning balance, I have considered whether any adverse impacts arising from the grant of planning permission would significantly and demonstrably outweigh the benefits.

Planning Balance

Benefits

7.12 Regardless of the discussions to be held on the Council's 5YHLS and Affordable Housing delivery, the Local Planning Authority place **significant**

weight on the delivery of market, affordable and self-build housing within the District and I agree with that.

7.13 As discussed above, there is no certainty and indeed much ambiguity over whether the proposed shop will be delivered for the reasons set out above and which are not repeated. I consider there can be no confidence that the shop will be delivered given the lack of commitment from any potential end user. There are also concerns regarding the location of the shop over 700m from the edge of the Village itself, thus becoming a trip destination and reducing the opportunity for linked trips. However, at 500m² floor area, if the shop is in fact delivered there would be some limited employment opportunities, clearly dependent on the nature of the end user and opening hours etc, and would provide some opportunity for walking and cycling trips and provide an additional facility to benefit the area. Overall I consider that only **limited weight** can be afforded to this element of the proposal.

7.14 Other benefits to the proposed development include additional highway works to improve accessibility to the school, an additional PROW link to the adjacent PROW network and contributions to local facilities. Whilst notable, the benefits are not so essential to the local area that they would draw anything more than an overall **limited weight** in favour of the development.

Disbenefits

7.15 I consider that the loss of agricultural land, given the wider rural context and scale of development, should be afforded **limited weight** in the balancing exercise against this proposed development.

7.16 The position in respect of the recreational pressure on the SSSI is less clear given the late contribution proposal by the Appellant. Subject to the response from GWT, this impact is given a **limited weight** in the balancing exercise.

- 7.17 Mr Nicholson's evidence explains that there is less than substantial harm to both South Farm and Frith Farm a Grade II* building, at the lower end of the spectrum. Whilst the resultant harm is not considered to provide a clear reason for refusal in its own right, it nevertheless attracts great weight and is a serious disbenefit of the proposal that strongly weighs against it. Policies CS9 and PSP17 (save for bullet 2) support the position taken by Mr Nicholson and as such the development is considered to be contrary to these policies.
- 7.18 The harm will be irrevocable and will undermine the setting of these Heritage Assets forever.
- 7.19 In my view the Landscape harm, including the harm to the character and appearance of Wickwar and its surroundings strongly weighs against the proposed development. There are significant concerns set out in Mrs Jarvis' evidence regarding the impact on the local and medium views towards the site, given the dominant presence of the proposed built form in its landscape setting and the inability of the receptor landscape to adequately absorb or mitigate against that impact.
- 7.20 Further, the Appellant has failed to demonstrate that a scheme of 180 dwellings can adequately and appropriately accommodated within this Appeal Site, such that the impact on the character and appearance of the area is significant and will result in landscape harm.
- 7.21 It is acknowledged that the settlement strategy policies within the Core Strategy have been deemed to be out-of-date. However, as explained above, the location of the site fails to reflect the evolution of the settlement and will result in a development that is divorced from the core of Wickwar in an isolated and backland form. When coupled with the more recent developments on the eastern side of Sodbury Road, this will result in a 60%

- increase in the scale of the settlement, without any material benefits to accommodate such a growth. Essentially the development will result in a shift from a medium sized village to a large village or small town that doesn't benefit from key facilities or infrastructure to accommodate such growth.
- 7.22 As a result of this conflict, it is considered that **significant weight** should be afforded to these matters which weigh strongly against the scheme.
- 7.23 Lastly, in respect of transport matters, neither contributions sought or proposed to address the provision of public transport within Wickwar will address the fundamental problem that Wickwar is a car borne location. Even with a limited bus service the proposal will be essentially car borne. Moreover no reliance can be placed on Wickwar having a bus service in perpetuity in the future.
- 7.24 All funding for any bus provision within the area will cease in April 2025, with the funded 84/85 service ceasing in April 2024. There will be no bus service before development could commence on this Appeal Site. Whilst there may be some funding found for another year, there is no guarantee and at present, there is no suggestion that this will occur.
- 7.25 Funding sought by WECA will effectively provide a service for 5 years, should a bus company be willing to take on the service. There would be no funding thereafter.
- 7.26 The Appellant's proposed new "commercial" service is entirely hypothetical, has no bus company behind it, is flawed in its assessment, and if the local companies won't take on a fully funded service, why would they take the risk on the proposed service given the serious concerns that have been identified with it.

7.27 The development is in an unsustainable location and in my view this issue is afforded **substantial weight** against the proposed development.

7.28 In my view, given the above considerations, the adverse impacts of this proposal significantly and demonstrably outweigh its benefits and permission should be refused.



8.0 **DECLARATIONS**

8.1 I am retained by South Gloucestershire Council to provide independent expert planning evidence in relation to the proposed residential development at Land West of Sodbury Road, Wickwar.

Statement of Truth

8.2 I confirm that, in so far as the facts stated in my Evidence, are within my own knowledge, I have made clear which they are and I believe them to be true, and that the opinions expressed represent my true and complete professional opinion.

Declaration

8.3 I confirm that my Proof of Evidence includes all facts which I regard as being relevant to the opinions which I have expressed and that attention has been drawn to any matters which would affect the validity of those opinions.

8.4 I can confirm that my duty to the Planning Inspector as an Expert Witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty as required.

8.5 I confirm that I am not instructed under any conditional fee arrangement.

8.6 I can confirm that I have no conflicts of interest of any kind.

APPENDIX 1

Affordable Housing Statement

Land at Sodbury Road, Wickwar: P22/01300/O

Appeal

Sept 2023

Affordable Housing Need, Supply, Projected provision

1.0 South Gloucestershire's Affordable Housing Need and Projected Supply

- 1.1 The most up to date evidence regarding affordable housing need for South Gloucestershire is the West of England Local Housing Needs Assessment (LHNA) published in September 2021.
- 1.2 Adopted South Gloucestershire Local Plan: Core Strategy (December 2013) Policy CS18-Affordable Housing sets out targets relating to affordable housing provision on relevant sites and identifies the West of England SHMA 2009 or *updated future housing market assessments* (my emphasis) as the basis for establishing the level and type of affordable housing needed in the District.
- 1.3 The use of SHMA 2009 (CD4.32) and its assessment of an average 903 affordable homes per annum is now over 12 years old and is out of date as it no longer represents South Gloucestershire's affordable housing need. Therefore the figure of 903 per annum can no longer be relied upon. The housing need assessments carried out for South Gloucestershire since SHMA 2009 supersede its findings. The previous SHMA updates (in 2015 (CD4.36 & 4.39) and 2019 (CD4.38 & 4.39)), which have been in active use in respect of determining planning applications and the delivery of the Council's statutory housing functions, both identified a need of approximately 300 affordable homes per annum.
- 1.4 The LHNA 2021 (CD4.33) adheres to the requirements of the most recent (at the time of assessment) National Planning Policy Framework (NPPF) published in February 2019 and the associated Planning Practice Guidance (PPG), utilising up to date evidence. The affordable housing need identified for South Gloucestershire in the LHNA 2021 is comparable with the need identified by both of the more recent 2015 and 2019 SHMAs.
- 1.5 The LHNA 2021 identifies affordable housing need over 2 planning periods – for 15 years 2020-35 and for 20 years 2020-40 and includes an assessment of both the backlog and projected need.
- 1.6 There is currently a need for 6,165 affordable homes for South Gloucestershire in the plan period 2020-35, or approximately **411 homes per annum**.
- 1.7 There is currently a need for 7,485 affordable homes for South Gloucestershire in the plan period 2020-40, or approximately **370 affordable homes per annum**.

- 1.8 The affordable housing need figures for the two periods are different because the affordable housing backlog is an absolute figure that is spread across the plan period. Therefore, the backlog per annum in a 20-year plan will be lower than the backlog per annum in a 15-year plan. Since the publication of LHNA 2021 the Authority has released its Local Plan Delivery Programme which identifies its new Local Plan period will be 2025-2040, it may be more relevant to consider the identification of the affordable housing need given across the 20-year period 2020-2040 in the LHNA 2021, however either could be used.
- 1.9 Over the next 5 years affordable housing provision is projected to increase in South Gloucestershire. Currently the Authority is forecasting to deliver over 2300 affordable homes in the next 5 years, **an average of more than 470 affordable homes per annum**. I consider this is a reasonable supply of affordable housing when considered against the Authority's projected supply of homes over the next 5 years (aligned with the Authority's HT published March 2023).
- 1.10 This projected supply of affordable housing is calculated on an individual scheme basis and currently only includes new build projected delivery through the planning process as part of provision secured through S.106 agreements, additional new build homes purchased direct from developers outside S.106 agreements and new delivery on Registered Provider (RP) led schemes. Overall affordable housing supply can include non-new build delivery such as conversions but this has not been included here. In year demolitions of affordable homes (to facilitate redevelopment and deliver increased/improved outturn) are accounted for.
- 1.11 I conclude that the correct evidence base to use to identify the affordable housing need for South Gloucestershire is the LHNA 2021. As well as being out of date, the need identified by SHMA 2009 is clearly an outlier and can no longer be relied upon.
- 1.12 Using the higher figure as a 'worse case' position the identified affordable housing need for 2020-35 is 6,165 or an average of 411 per annum. Over the next 5 years South Gloucestershire is forecasting to deliver over 2,300 affordable homes, average 411 per annum.
- 1.13 **Hence the Authority can demonstrate it currently has an appropriate supply of affordable housing to meet its annualised level of identified affordable housing need.**

2.0 Household demand – South Gloucestershire’s Housing Register

- 2.1 Data obtained as a snapshot from the Authority’s Housing Register can help to illustrate current known housing demand but does not replace the identified housing need as evidence by LHNA 2021 for South Gloucestershire.
- 2.2 The figure of 4,228 (31st March 2023 snapshot) represents all households registered, including those who are currently adequately housed or able to access alternative housing through their own resources.
- 2.3 The LHNA 2021 has considered the current level of affordable housing need following the requirements of NPPG and this forms part of the total identified affordable housing need. **For planning purposes it is appropriate to use the most up-to-date identified affordable housing need set out in LHNA, not demand data from the Authority’s Housing Register.**

3.0 Historic Affordable Housing Delivery

- 3.1 The LHNA 2021 is the most up-to-date evidence of affordable housing need and therefore includes any net effect of under/over delivery of affordable homes which may have occurred historically in South Gloucestershire. In short the backlog is accounted for in the projected need. The easiest way to see this is if there has been under provision previously more households would form part of the current assessed affordable housing need identified in the LHNA (i.e. the backlog would be higher). Any previous households whose need was not met will have left the area, are no longer in need, or remain in need and have been counted within the identified affordable housing need in the LHNA.
- 3.2 Undertaking an analysis of historic delivery is therefore not helpful or required. The LHNA 2021 remains the most up-to-date assessment of affordable housing need.
- 3.3 **I conclude that the Authority can demonstrate it currently has an appropriate supply of affordable housing to meet its annualised level of identified affordable housing need.**

4.0 Proposed development at Wickwar

- 4.1 The LHNA 2021 does not break down to sub-area so this is a District wide need, therefore it is not possible to conclude an identified affordable housing need for Wickwar following the appropriate assessment requirements in NPPF and NPPG.
- 4.2 Whilst I consider the only appropriate evidence to use to identify affordable housing need is that provided by the LHNA 2021, if snapshot demand data from the Housing Register is viewed current households in a reasonable preference category selecting Wickwar as their first choice of location could

have their choice met due to current supply projections. The snapshot (16th August 2023) shows 16 households that have selected Wickwar as their first choice of area to live in. There are more than 30 affordable homes projected for delivery in Wickwar in the 5 year period from 2022 from projected commitments.

- 4.3 However, all affordable homes are provided to meet District need as identified by an up-to-date LHNA and therefore LHNA 2021 remains the correct evidence base to use to identify the affordable housing need for South Gloucestershire and Wickwar.**

APPENDIX 2

Stagecoach Service Timetable

84 Yate & Wotton-under-Edge Circular clockwise via **Wickwar, Charfield & Hawkesbury Upton**
85 Yate & Wotton-under-Edge Circular anti-clockwise via **Hawkesbury Upton, Charfield & Wickwar**

Mondays to Saturdays

	84	84	85	85	84	85	84	85
Yate Stover Rd	0610	0805	1005	1205	1405	1605	1805	
Yate Shopping Centre [B]	0615	0810	1010	1210	1410	1610	1810	
Yate Shopping Centre [B]	0620	0820	1020	1220	1420	1620	1820	
Chipping Sodbury The Clock	0625	0825	1025	1225	1425	1625	1825	
Chipping Sodbury The Boot	-	-	1026	-	1426	-	1826	
Horton School	-	-	1034	-	1434	-	1834	
Hawkesbury Upton Fox Inn	-	-	1042	-	1442	-	1842	
Hillesley St Giles' Church	-	-	1047	-	1447	-	1847	
Alderley The Old Rectory	-	-	1051	-	1451	-	1851	
Wickwar High St	0635	0835	-	1235	-	1635	-	
Cromhall Church Lane	0642	0842	-	1242	-	1642	-	
Leyhill Prison	0645	0845	-	1245	-	1645	-	
Charfield Berkeley Close	0650	0850	-	1250	-	1650	-	
Charfield Railway Tavern	0653	0853	-	1253	-	1653	-	
Kingswood War Memorial	0656	0856	-	1256	-	1656	-	
Kingswood KLB School	-	-	-	-	-	-	-	
Wotton-under-Edge Memorial	0705	0905	1105	1305	1505	1705	1905	
	▼	▼	▼	▼	▼	▼	▼	
Wotton-under-Edge Memorial	0710	0910	1110	1310	1510	1710	1910	
Kingswood War Memorial	-	-	1114	-	1514	-	1914	
Charfield Railway Tavern	-	-	1119	-	1519	-	1919	
Charfield Berkeley Close	-	-	1121	-	1521	-	1921	
Leyhill Prison	-	-	1127	-	1527	-	1927	
Cromhall Church Lane	-	-	1130	-	1530	-	1930	
Wickwar High St	-	-	1138	-	1538	-	1938	
Alderley The Old Rectory	0718	0918	-	1318	-	1718	-	
Hillesley St Giles' Church	0721	0921	-	1321	-	1721	-	
Hawkesbury Upton Fox Inn	0727	0927	-	1327	-	1727	-	
Horton School	0735	0935	-	1335	-	1735	-	
Chipping Sodbury The Boot	0742	0942	-	1342	-	1742	-	
Chipping Sodbury The Clock	0745	0945	1145	1345	1545	1745	1945	
Yate Shopping Centre [B]	0750	0950	1150	1350	1550	1750	1950	
Yate Shopping Centre [B]	0755	0955	1155	1355	1555	1755	1955	
Yate Stover Rd	0800	1000	1200	1400	1600	1800	2000	

▼ These buses are guaranteed to connect, with through fares available

For the most up to date information
please go to stagecoachbus.com/coronavirus



86 from Yate to Kingswood

Mondays to Saturdays

	84	84	85	85	84	85	84	85
Yate Shopping Centre [B]	▼	▼	▼	▼	▼	▼	▼	▼
	86	86	86	86	86	86	86	86
Yate Stover Rd	0800	1000	1200	1400	1600	1800		
Coalpit Heath Church	0806	1006	1206	1406	1606	1806		
Ram Hill Greenacres Park	0809	1009	1209	1409	1609	1809		
Lyde Green Apple Grove	0814	1014	1214	1414	1614	1814		
Emersons Green Sainsburys	0820	1020	1220	1420	1620	1820		
Mangotsfield Church	0827	1027	1227	1427	1627	1827		
New Cheltenham Made-for-Ever	0835	1035	1235	1435	1635	1835		
Kingswood Shopping Centre	0850	1050	1250	1450	1650	1850		
Courtney Road School	0855	1055	1255	1455	1655	1855		

86 from Kingswood to Yate

Mondays to Saturdays

	86	86	86	86	86	86	86	86
Courtney Road School	0855	1055	1255	1455	1655	1855		
Kingswood Shopping Centre	0910	1110	1310	1510	1710	1910		
New Cheltenham Made-for-Ever	0920	1120	1320	1520	1720	1920		
Mangotsfield Church	0927	1127	1327	1527	1727	1927		
Emersons Green Sainsburys	0737	0937	1137	1337	1537	1737	1937	
Lyde Green Apple Grove	0742	0942	1142	1342	1542	1742	1942	
Ram Hill Greenacres Park	0747	0947	1147	1347	1547	1747	1947	
Coalpit Heath Church	0751	0951	1151	1351	1551	1751	1951	
Yate Stover Rd	0800	1000	1200	1400	1600	1800	2000	
	▼	▼	▼	▼	▼	▼	▼	▼
	84	84	85	84	85	84	85	86
Yate Shopping Centre [B]	0810	1010	1210	1410	1610	1810	2005	



APPENDIX 3

WECA Committee Report January 2023



REPORT TO: WEST OF ENGLAND COMBINED AUTHORITY
COMMITTEE

DATE: 18 January 2023

REPORT TITLE: SUPPORTED BUS SERVICES: CONTRACT
DECISIONS

DIRECTOR: ALISTAIR KIRK, INTERIM DIRECTOR OF
INFRASTRUCTURE

AUTHOR: MALCOLM PARSONS, HEAD OF CAPITAL DELIVERY

Purpose of report

This report sets out the overall approach to buses, bringing together supported bus services, funded by the Transport Levy, to be taken in the context of regional bus network investment, primarily funded through the Bus Service Improvement Plan (BSIP).

The region secured significant funding through BSIP. This enables change and a move from traditional to transformative solutions for the region. Solutions which our residents are asking for. Solutions which provide a platform to deliver our vision of future transport for the West of England.

The digitization of transport services provides incredible opportunities to effectively bring new modes into the transport systems and give choice and control over transport options to the customer.

BSIP and Future Transport Zone (FTZ) combines funding to enable new and more responsive services such as Demand Responsive Transport (DRT), as well as more flexible modes of personal transport through micro-mobility, and other measures.

Now we can make real changes to our public transport network, bringing about the transformation needed to the bus and wider transport network, delivering innovation and more journey choice for more people across the region.

A decision needs to be made on supported bus services, funded by the Transport Levy, to take effect from Sunday 2 April 2023 when the current contracts for supported bus services are due to expire.

The proposed approach for allocating the time limited Bus Service Improvement Plan (BSIP) budget and the rationale for focusing on supporting the core bus network is

based on the recognition that there are overlaps between decisions on supported services and proposed bus network interventions through BSIP, FTZ, and the proposed West of England Sustainable Transport Community Innovation Fund (WESTCIF) for example.

The report sets out a raft of bus network investment interventions including, fare packages, revenue support to enhance services, rural (DRT), feeder services, additional services, and driver recruitment campaigns.

This investment precedes future capital investment in bus priority measures and passenger facilities through the City Region Sustainable Travel Settlement (CRSTS) aimed at ensuring longer term public transport sustainability.

Through BSIP we have also created meaningful partnerships with operators, including revenue share opportunities through Enhanced Partnerships (EP) scheme.

Recommendations

The West of England Combined Authority Committee is recommended to:

- a) Note award of DRT services across the region funded through BSIP.
- b) To agree that a Levy of an amount set out in table 1, section 11, with additional contributions included within the table, be issued by the Combined Authority (the “Transport Levy”) to the constituent councils under 74 of the Local Government Act and in accordance with the Transport Levying Bodies Regulations 1992.
- c) To delegate to the Director of Infrastructure, in consultation with the infrastructure Directors in the CA constituent councils, the award of contracts to the bus operators in accordance with supported bus service contract option set out in Appendix A against the funding envelope available from the Transport Levy.

Voting arrangements

A decision on the [levy] requires a unanimous vote in favour at a full meeting of the Combined Authority by all members appointed by the constituent councils, or substitute members acting in place of those members, present and voting

Other decisions must be carried by a majority of the Mayor and members appointed by the constituent councils, or substitute members acting in place of those members, present and voting

Policy context

Passengers value buses. The West of England has a vision for bus services across the region that:

- people can depend on;
- are quick and reliable;
- present a simple and easy to use network;
- are accessible for everyone;
- are safe and comfortable; and
- offer value for money.

The current transport policy framework, agreed by all authorities, is set out in the Joint Local Transport Plan, Bus Service Improvement Plan and West of England Bus Strategy. An expanded bus service and less reliance on car travel is also vital to meeting our net zero carbon target by 2030 and our economic and quality of life ambitions. The BSIP sets out our targets on designate corridors to: reduce bus journey times by 10%, ensure 95% of services run on time, and return to pre-pandemic patronage by 2025 and continuing to grow beyond that.

The joint BSIP (covering the Combined Authority and North Somerset Council (NSC)) secured the second highest funding award in the country. This funding (now confirmed) totals £105.5m over the three years 2022/23 to 2024/25. Of this, £57.5m is revenue funding for fare reductions and service improvements etc.

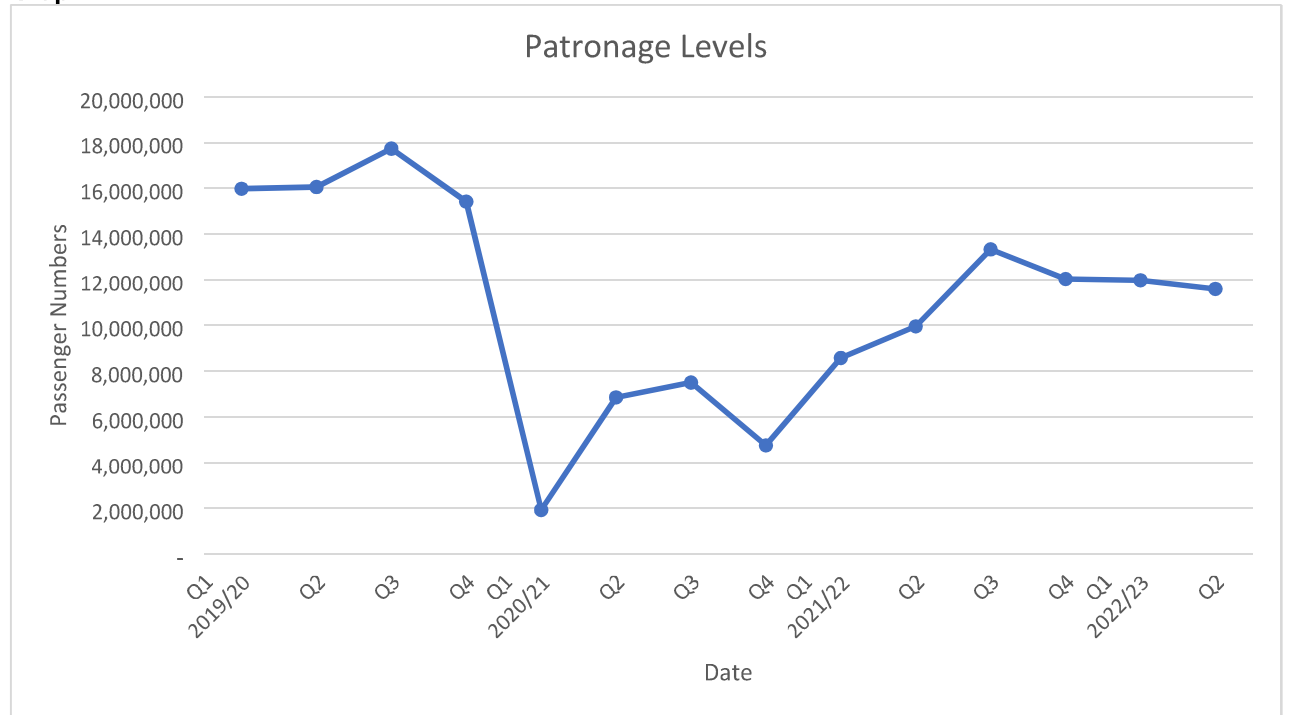
Current state of bus market

After some years of modest growth, see graph 1, the commercial bus market in the West of England faces some serious challenges.

- Covid recovery - Passenger numbers have not fully recovered from the pandemic and remain at between 75 and 80% of pre-Covid levels.
- Government bus recovery grant – this is due to end on 31 March 2023 which will put further pressure on the network.
- The driver shortage - this remains the biggest barrier to growth and undermines the reliability of services. Whilst driver numbers are increasing very slowly the region is still short by around 250 drivers resulting in the withdrawal of routes. Ad-hoc cancellations due to driver shortages have undermined reliability and generated serious frustration for the public.
- Inflation – has been, and is forecasted to continue through 2023, to be above established norms, at rates last seen in the 1980's. This has had a detrimental impact on the commercial viability of services primarily through rising fuel and wage costs for operators. Value for money is becoming increasingly difficult to demonstrate in many parts of the region and an alternative innovative model for a declining market is needed.

This combination of lower passenger numbers, loss of Government funding and the driver shortage means that the commercial network is in a very fragile state with existing services under constant threat and the capacity to add new services is very restricted – irrespective of funding that might be available. Recent examples of network fragility have seen service 460, 427, 458 and 459 proposed to stop in March 2023, while on the 16th November First West of England announced approximately 1400 journey cancellations as a consequence of limited driver availability.

Graph 1



Overall approach to the bus network

Given the above there is a need to prioritise interventions on buses to strengthen the core commercial bus network and make it economically viable and sustainable. If this core commercial network continues to shrink there is a risk of further decline where paying passengers are put off by poor, unreliable or non-existent services, leading to further revenue declines and further service cuts. A decline of this nature would have serious impacts, it:

- puts intolerable pressure on the very limited resources for supported bus services.
- will add to the number of car journeys and congestion;
- makes the aim of net zero carbon by 2030 unachievable.
- undermines the economy and quality of life in the region.

The BSIP funding provides a one-off opportunity to turn that spiral of decline into real progress. It is one-off because it is a time limited budget (to March 2025) and continual representations to Government will need to be made both regionally and nationally in the current economic climate for its continuation post March 2025 in some form. It is also an opportunity because our net zero target is only 8 years away.

It is therefore imperative that these resources are used to:

- maximise the number of new passengers;
- maximise the chance of growing revenues and therefore viability;
- strengthen and grow the core commercial network.
- provide better value for money
- test and provide an alternative model for a failing market

This is not to say that we should ignore communities without public transport, either because they are in areas of deprivation, or because they are rural and isolated. However, given the one-off opportunity to strengthen the network, we cannot divert resources away from the above goal, otherwise we risk further reduction in services. It is also important to look at innovative ways of helping communities which currently do not have access to public transport.

It is recognised that some supported services have historically included stops at schools as part of their timetables. Where it has not been possible to retain these services, and the area is covered by a DRT zone, DRT providers are being asked to prioritise school pupils in these areas.

This is an innovative model. It is essential that we communicate with our residents and business on the model and the inevitable issues that will occur as this new service is introduced but it provides our residents with a service option that we will work on to ensure improves over time.

Strategic interventions on buses

As a region we currently have access to the Transport Levy (for supported services), BSIP (jointly with North Somerset Council), Future Transport Zone (for discrete Demand Responsive Transport) and City Regional Sustainable Transport System (for capital investment).

1 To Support and Grow the core commercial bus network (BSIP funded)

The aim of these interventions is to make the bus network more attractive with simpler, cheaper fares, more reliable and go services, easier access to those living away from core routes and more reliable by addressing the driver shortage,

1.1 Fares

An initial BSIP package of fare reductions/simplification was implemented in September 2022 with a flat £2 fare across Bristol and Bath and a flat £1 fare for children anywhere across the West of England. Fares outside Bristol and Bath were capped at £3.70 (single) and £5.00 (return).

A further package of BSIP fare changes will be introduced in 2023. Areas under consideration could include free or reduced travel for targeted groups and a focus on encouraging people to change deep rooted travel habits.

1.2 Enhanced Services

The focus of BSIP enhanced services will be to make services more attractive by aiming to make them 'turn-up-and-go' frequencies or enhance routing to better serve communities. The focus of these will be key intercity routes, towns to city routes and key urban routes. In the medium term these corridors are likely to see enhanced infrastructure through the CRSTS Programme to reduce journey times and increase reliability. DRT feeder services also support corridor commercial services (see below)

The service enhancements will be negotiated rather than procured. However, the capacity of the industry to provide enhanced services will be limited due to the current severe driver shortage.

Services under consideration for enhancements align with infrastructure bus priority measures delivered through CRSTS corridor projects post BSIP funding.

As an example, a revised commercial service north of Yate (potentially Y2) will be negotiated with the operator, complimenting the existing Y1 to the south of Yate forming a more wholistic commercial bus offer for the community while providing a high frequency, probably 15min, core corridor service between Yate and Bristol.

We continue to work with operators exploring further service enhancement opportunities as they may arise.

1.3 Demand Responsive Transport

Demand responsive transport (DRT) through BSIP and the Future Transport Zone funding streams, offers the region an innovative approach to public transport services. DRT is a flexible service that provides shared transport to users who specify their desired location, normally an existing fix bus stop, and time of pick-up and drop-off.

DRT will complement fixed route commercial public transport services improving patronage of these services, mobility in low-density areas and at low-demand times of day. It cannot used to compete with existing commercial bus services; however, it will compliment those services by feeding passengers into existing services.

DRT is a public transport service which requires advanced booking, accessed through telephone, website, or mobile device applications. The service has been awarded with a 1hr service level. In some cases, this offer will far exceed current supported bus service availability.

DRT can contribute to decarbonisation by replacing private car journeys and facilitating multi-modal travel (for example, linking users to fixed route bus services).

DRT services have been implemented elsewhere in the United Kingdom to improve social inclusivity and access to services, this will also be the case in the West of England Combined Authority region.

DRT will be deployed across the region for both rural and feeder services from April 2023. See Appendix C.

1.4 Feeder Services

BSIP DRT also offers the opportunity to link passengers in and around towns with higher frequency commercial services on main corridors into our urban areas and therefore perform a 'feeder' service function.

DRT offers the additional opportunity to enhance corridor commercial services, through increasing patronage, and avoiding costly commercial bus route mileage (and longer journey times for passengers) where services divert off core corridors weaving through suburbs. Rerouting these services and using DRT instead, increases PSV bus service mileage utilisation and (given the severe driver shortage) has the potential to release PSV drivers for other services.

Tenders were issued to the market for DRT schemes on 4 November 2022, returning 6th December 2022, and following consultation, contracts were awarded 22nd December. This timetable will allow decisions on supported services to be made with a clear understanding of the DRT services being proposed.

1.5 BSIP Additional Services

BSIP allocation included funding to commence new bus services across the region which could become commercially viable after an initial funding period. These services will not duplicate supported service routes or compete with commercial services. Routes for these services have developed in consultation with constituent authority technical officers, community groups and analysis of existing bus service patronage and commercial modelling.

1.6 Investment in driver recruitment

The lack of Public Service Vehicle (PSV) drivers is an immediate short-term barrier to delivering improved services. We are already working with the industry to provide help with training and publicity for recruitment. We are also exploring whether there are any other short-term BSIP investments to get more people into, and staying, in the industry.

2 Capital Investment to speed up bus journeys, improve reliability and passenger experience.

CRSTS is a 5-year capital investment programme to improve the speed and reliability of bus services through segregation, bus priority, junction upgrades, transport hubs etc. Identified priorities include

- Bristol to Bath Sustainable Transport Corridor
- Bristol City Centre Sustainable Transport Corridor,
- Portway Sustainable Transport Corridor and Hub
- Long Ashton Metrobus Improvements,
- M32 Sustainable Transport Corridor and Hub,
- Bath City Centre Sustainable Transport Corridor
- Thornbury to North Bristol Sustainable Transport Corridor
- Chipping Sodbury to Hambrook Sustainable Transport Corridor
- Somer Valley to Bristol and Bath Sustainable Transport Corridor
- Stockwood to Cribbs Causeway Sustainable Transport Corridor
- Bristol to Hengrove Metrobus extension

3 Partnership / Revenue Sharing agreements with bus operators

A key element of both the direct support for the commercial network through BSIP and the capital investment through CRSTS is the partnership with the industry to ensure that these investments benefit the public and the operators. The first step was the agreement on fares where we agreed that any increase in revenues resulting from the subsidised fares would be shared between the bus company who would take 25%, and the Combined Authority who would take 75%.

We intend to build on this agreement as CRSTS is delivered and further fares and service enhancements rolled out to ensure that the benefits of investment feed back into further service improvements and sustainable subsidy levels. This will be

developed through our EP which will be a legally agreed document between Operators and local authorities.

4 Interventions to support excluded communities

4.1 Supported bus services

The Combined Authority has provided support to 80 bus service contracts through the levy around the region which were not viable as commercial operations prior to the onset of the pandemic. These contracts were extended from the end of August 2022 through to the beginning of April 2023. Since the pandemic, several formerly commercial bus services have been cut due either to unsustainable loss of revenue or because of the chronic driver shortage which is affecting bus operators nationally. This has resulted in a long list of potential service options being included in the tender process.

It is recognised that supporting all the services within the long list is not achievable within the funding envelope. Commercial operators are under no obligation to tender for any of the services and the final list of those where there is a bid was made available to the constituent authorities on 14th December 2022. The supported services that were chosen, will be funded from the Transport Levy, or other funding through the relevant constituent authority as BSIP funding is not available to support existing revenue funded services. Contracts for these services will be let on a 4yr basis.

4.2 Demand Responsive Transport (DRT)

BSIP DRT offers an opportunity for an alternative public transport offer in the region. As noted previously, DRT offers flexibility of service, and can reach into communities previously not, or poorly, served by traditional buses. The service will operate Monday – Saturday, with a 1-hour demand frequency, within multiple zones across the region. For details of these zones, refer to appendix C.

DRT is an innovative transport offer for the region and having reached agreement with North Somerset Council will be funded through BSIP for 2 years. It offers the additional advantage of more granular passenger movement data which we can use to make further public transport decisions in the future.

4.3 West of England Sustainable Transport Community Innovation Fund

A lot of rural areas now depend on supported bus services as their only public transport service. These services are increasingly expensive and unsustainable.

This is an opportunity to develop new ways of supporting rural areas that may turn out to be more sustainable. The West of England Sustainable Transport Community Innovation Fund is the mechanism we will use. The key points are

- Funding is time limited, however we are looking to allocate up to £2m for a period of 2 years.
- We are looking for proposals from places (parishes, communities etc) for public transport proposals that meet their specific needs, as well as enhancing the wider public transport network
- We are looking for new innovative proposals given that we know the traditional 'supported bus service' is increasingly unsustainable.

- In some cases, the fund could provide grants for parishes to use on their ideas. In other cases, the proposals will need to be procured and managed by the Combined Authority in the same way that larger DRT/supported buses are.

5 Timescales

5.1 Levy Supported Services

To ensure that we meet the 2 April 2023 date for service commencement the following milestones must be met, which are constrained by statutory and legal requirements:

18 th January 2023	Decision
23 rd – 26 th January 2023	Contract award letters
27 th January 2023	Contract 10day legal standstill period
8 th February 2023	Contract award
9 th – 13 th February 2023	Operators prepare registration documents
14 th February 2023	Services registered with LTA – assurance function and on-street timetable
15 th & 16 th February 2023	Complete registration process / assurance ahead of registration with Traffic Commissioner
17 th February 2023	Service registration with Traffic Commissioner (42 day)
2 nd April 2023	Services start

5.2 BSIP Additional Services

The BSIP provides revenue funding through to 2025. The grant from the Department for Transport (DfT) included an allocation to test new services across the region with the potential to become commercially viable. Funding these services is limited to March 2025, unless they are proven to be commercially viable and self-sustaining beyond this date. Implementation of these services is in-line with the timescales noted above.

5.3 DRT

Within the BSIP, we have agreed an allocation of funding with the DfT for Demand Responsive Transport. Funding for these services expires March 2025. As these services are classed as public transport services, they require registration with the traffic commissioner, consequently the timescales set out in 'Support Services' above apply.

5.4 Enhanced Services

Initially these schemes will draw funding from the BSIP allocation. Enhancing services along key transport corridors is intended to attract higher patronage. Therefore, as noted previously under 'Partnership / Revenue Sharing agreements with bus operators' it is expected Enhanced Services will generate a revenue back to the Combined Authority for reinvestment in further BSIP improvements. Subject to agreement with Operators, service enhancements will commence from April 2023.

5.5 **West of England Sustainable Transport Community Innovation Fund**

Funding for the Community Innovation Fund will be limited to March 2025. However, there may be instances where these transport initiatives prove to be viable beyond March 2025. The proposed timescale for this fund is set out below;

- Launch prospectus January 2023
- Bids into fund received 4 weeks after launch (likely mid-February 2023)
- Determination grant offers, 4 weeks after closing date (likely early March 2023)
- Announce successful bidders (March 2023)
- If applicable, CA procurement of service(s), 6 weeks (April 2023)
- Services to commence (subject to bidders agreed schedule) April 2023.
- Reopen fund April 2023

6 **Evaluation and optioneering approach**

6.1 **Levy Supported Services**

An evaluation framework, developed with specialist support for the awarding of Supported bus service contracts for levy funded services, has been agreed with the UAs. This framework was used by both CA and UA officers through the evaluation of tenders.

Each service was assessed against key priorities of social need (including access to education, health, employment, and shopping) and value for money where available. The following steps have been followed:

- | | |
|--------|---|
| Step 1 | Each service scored against the Evaluation Framework. |
| Step 2 | Tenders assessed for price (70%) and quality (30%) |
| Step 3 | Remove services that have a cost per passenger journey greater than £40.00 as agreed by the West of England Combined Authority Committee (July 2022). |
| Step 4 | Ranking of services based on steps 1-3 |
| Step 5 | Optioneering to consider network approach to ensure consistent provision across the region within budget envelope |

We are confident this is a robust and evidence led approach which strikes a balance between need and value for money.

Additionally, there is the opportunity for authorities to fund the award of specific services within their administration if they choose to do so above the levy supported services. Authorities are considering extension of some existing supported services as further transitional protection, recognising the importance of bus services and the implementation of the new service DRT.

6.2 **BSIP DRT and Additional Services**

A new evaluation process developed by external experts to support the evaluation and tender award of both DRT and BSIP Additional service contracts has been developed and deployed for the selection of these services. The following steps for these services was followed.

- | | |
|--------|---|
| Step 1 | Each service scored against the Evaluation Framework. |
|--------|---|

- Step 2 Tenders assessed for price (70%) and quality (30%)
- Step 3 Ranking of services based on steps 1-2
- Step 4 Optioneering to consider network approach across the region within budget envelope

7 Engagement

Officers from the Combined Authority, its Unitary Authorities and North Somerset Council have been working closely throughout the development of the tender options and there is broad agreement to the process and the detail of the evaluation framework. Directors, Finance leads, and CEOs have been consulted through the latter stages of the process, as have lead members including scrutiny, so there is a good understanding of the challenges facing us in creating a sustainable bus network within the known constraints.

8 Consultation

Officers from the Combined Authority has consulted with its Unitary Authorities throughout selection of Supported Services, including

- September – November 2022; Agreement to the supported bus services selection evaluation matrix
- 28th November – 14th December 2022 Joint evaluation selecting Supported bus services process
- Chief Executives 26th October 23rd November 2022, and 14th December 2022
- Director's meeting 24th November and 8th December 2022, 4th and 6th January 2023
- Transport Directors, in conjunction with Chief Executive Officers 14th December 2022
- Bath and Northeast Somerset Senior Officers and CEO 28th October 2022
- Bath and Northeast Somerset Senior Officers 23rd November 2022
- South Gloucestershire Transport officers 22nd November 2022
- Bristol City Council Transport officer 24th November 2022
- Section 151 Officers 24th November and 8th December 2022
- CEO's workshop 16th December 2022

Additionally, all tender documents for supported bus services and DRT services were shared and agreed with UA Transport Officers and CEO's in advance of tender release. Tender release dates were 26th October 2022 Supported Services and 7th November 2022 DRT.

9 Risk

Key risks associated with this process are as follows:

No.	Risk	Mitigation
1	Insufficient funding through either the Transport Levy or the BSIP allocation	Use of tendered prices for all DRT and supported services results in informed decisions within funding available.
2	Decision not made on service contracts in time to commence operations on 2 April 2023	Rework deployment plan identifying critical path, see section 5.1

3	BSIP funding ends in 2 years	continue to press Govt for further funding, periodically review the potential for the service to become commercially viable, increased funding decisions, review services
4	Inability for bus operators to provide services due to driver shortage, or the non-availability of vehicles	Invite bids from multiple operators. On award confirm availability with chosen operator. Hold alternative operator option.
5	Transition to the new DRT services	Additional transition resources, involvement and communications with user groups, residents and business as appropriate, continue some existing supported services for a period of time during transition
6	Risk of challenge in respect of service to users	Robust and intensive publicity leading up to, and during initial stages of, new service offer. Actively seek user feedback, iterate DRT offer where necessary to meet demand and user feedback
7	Estimates in respect of concessionary fares is too low	Regular reporting and monitoring, request for additional funding from the Unitary Authorities mainly and seek additional options , review service options
8	The final Concessionary fares reimbursement rate informed by the DfT is higher than expected or volumes increase at a higher rate than estimated	In conjunction with risk 7, regular monitoring and reporting enabling further funding and service decisions to be take.
9	Loss of Bus Service Operator Grant	DfT to provide 12-month consultation notice. Continue dialogue with DfT.
10	Reduced number of conventional bus operators in the region	Tenders invested from multiple operators.

Any of these risks materialising could result in the loss of bus services in some parts of the region.

10 Public Sector Equality Duties

A comprehensive, accessible, and affordable bus network is vital to enabling people to access jobs, health, food, leisure and other services and opportunities. The overall aim of this report is to secure as many bus services as possible within the funding constraints, complimented by DRT services to provide a coherent network across the region.

The service tender process has included an Equalities Impact Assessment (EqIA), independently assessed, including consideration of where services may be lost as a result of this decision. There are negative impacts and in mitigation of these DRT and WESTCIF has been used. The extent to which these mitigations will fully mitigate is likely to be greater than 98% and will be reviewed twice a year. Mitigations identified within the EqIA as a result of to the loss of services are being met primarily by a Supported Bus service or DRT. Further mitigations can be

deployed through the WESTCIF. The EqlA process identified 2 services as having limited mitigation;

516 - Whitchurch to Hengrove Park. The journey is possible by interchange in the city centre.

52 – Highridge residents would not have access to an alternative bus service other than the proposed 524 service, while residents along the A38 would only have access to the premium airport service A1.

The Combined Authority with Unitary Authorities will continue to work on options to mitigate impacts, regularly reviewing mitigation measures.

The geographical scope of DRT will connect residents and communities in the region to bus services, where these residents and communities currently do not have access to conventional bus services, further aiding accessibility.

The EqlA process has identified the need to ensure robust publicity of the DRT offer, to reach all residents in the region and especially those residents with protected characteristics.

11 Finance

11.1 Transport Levy expenditure 2022/23

In considering the Transport Levy expenditure for 23/24 and 24/25, we have taken in to account the financial pressures on constituent authorities. Record energy prices and high levels of inflation are driving cost pressures across all authorities. This is in the context of increased cost of living demands on residents in the region. *Table 1* sets out the current budget, end of year forecast, and the assumed budget for the next 4 years.

Table 1 does not include expenditure outside of the levy, for example through BSIP. As noted earlier in this paper, BSIP will expire March 2025. Further decisions on the levy and which services to procure beyond BSIP funding will need to be considered within the next 2 years.

11.2 Concessionary fares reimbursement

The reimbursement rate for concessionary fares for 2023/24 is currently being finalised (by early 2023) and this is expected to result in a 22% - 32% increase.

Passenger numbers using concessionary passes have remained low compared to pre-Covid levels (at around 66%). We have therefore built scenarios based on a small growth to 70%, medium growth to 75% and high growth to 80% of pre-Covid levels over the next financial year. This 2x3 matrix gives us a range of spend of between £10.2m and £12.5m. Refer to appendix E

A similar exercise has been done for 2024/25 assuming a further 5% increase in the reimbursement rate to operators (this won't be determined finally until early 2024) and passenger growth figures to 75%, 80% and 85% of pre-Covid levels.

For the purposes of forecasting shown within table 1, we have assumed patronage increased by 5% to 70% pre-covid for 2023/24, with a steady 5% increase per annum through to 2026/27.

The BSIP sets out our targets on designate corridors to return to pre-pandemic patronage by 2025. The Combined Authority anticipates DRT providing greater

flexibility and travel options into more areas of our region, stimulating passenger growth across all demographics.

Table 1: Transport Levy Expenditure

[illegible]

of reserves is required and essential to be maintained to account for any future service maintenance issues that always occur.

11.3 **Bus Services available funding 2023/24 & 2024/2025**

The planning assumption for available funding in 2023/24 is the Transport Levy without the 2% increase although the MTFF that was indicated for planning purposes to Committee in January 2022 and in discussions with the Unitary Authorities in the lead up to this report.

Funding has been identified for BSIP Additional bus services from the BSIP allocation now it has been confirmed by Government.

- Transport Levy - bus services element (from the MTFF Jan 2022)
 - 2023/24 - £3.085m (+ £1.147m DfT Bus Service Operator Grant)
- BSIP funding for new additional bus services – £6.9m 23/24; £6.9m 24/25
- BSIP funding for commercial enhancements - £3.98m 23/24; £3.0m 24/25
- BSIP funding for DRT schemes - £3.0m 23/24; £3.0m 24/25

CRSTS funding for enhanced sustainable transport corridors is shown in table 2 below

Table 2

	22/23	23/24	24/25	25/26	26/27	Total
CRSTS	£108m	£108m	£108m	£108m	£108m	£540m

There are limitations as to what BSIP funding can be used for, i.e. it is not intended to be applied to support bus services that have been historically supported through Local Transport Authority (LTA) revenue budgets. The BSIP funding allocation is aimed primarily at promoting growth in bus use and the expectation from Government is that it will be utilised for fare incentives and new service provision.

11.4 **Bus Service Operator Grant**

The Bus Service Operators Grant (BSOG) is a discretionary grant from the DfT paid to operators of eligible local bus services to help them recover some of their fuel costs. The amount each bus operator receives is based on the amount of fuel they use. This grant is not guaranteed annually and remains subject to the sole discretion of the DfT. In the event this funding does not materialise funding for services would need to be sought from sources.

The committee will be kept informed of the financials in respect of the transport levy funded services on a regular basis at committee. Particular regard will be given to the period prior to the end of BSIP funding and unitary authorities funding the transport levy will need to have due regard to this in their Medium-Term Financial Plans along with the West of England Combined Authority.

Advice given by: Richard Ennis – Interim Acting Chief Executive and Director of Investment and Corporate Services

12 Legal Implications:

The West of England Combined Authority has the powers from parts IV and V of the Transport Act 1985. These include "securing", formulating policies, "service subsidy agreements"; informational and promotional measures, and related duties connected

to public passenger transport services (Sections 63 to 64). These powers are exercisable "jointly" with the UA's.

In particular

(S63(1)) the duty to secure the provision of such public transport passenger services as the Combined Authority consider it "appropriate" to secure, to meet any "public transport requirements" which would not, in their view, be met apart from any action taken by them for that purpose.

(S63(5)) - the power to enter into agreements providing for "service subsidies" (S63(5)) – but only where the service in question would not be provided, or be provided to a particular standard, without subsidy;

The operation of the levy arrangements set out in art 6 of the West of England Combined Authority Order 2017.

6 Funding

(1) The constituent councils must meet any reasonably incurred costs of the Combined Authority, other than the costs mentioned in paragraph (4) [not relevant for this purpose], to the extent that the Combined Authority has not decided to meet these costs from other resources available to the Combined Authority.

(2) Any amount payable by each of the constituent councils to ensure that the costs of the Combined Authority referred to in paragraph (1) are met is to be determined by apportioning such costs between the constituent councils in such proportions as they may agree or, in default of such agreement, in proportion to the total resident population of the Area which resides in that council at the relevant date as estimated by the Statistics Board.

(3) The functions mentioned in articles 8(1), (4) and 9 [this includes subsidised transport] may be funded out of the levy issued by the Combined Authority to the constituent councils under section 74 of the Local Government Finance Act 1988 (levies)(2) and in accordance with the Transport Levying Bodies Regulations 1992(3).

Advice given by: Stephen Gerard – Interim Director of Law and Democratic Services

13 Climate Change Implications

Provision of a good public transport network is essential to help mitigate the impact of climate change by reducing the number of vehicles on the road to meet the demand for travel. Exhaust emission standards for buses have been raised

progressively over recent years and bus operators have invested heavily in new vehicles.

14 Land/property Implications

None

Advice given by:

15 Human Resources Implications:

None

Advice given by:

Appendices:

List any appendices to the report:

- A. Supported bus service option*
- B. Supported Services tender long list*
- C. DRT Awarded zones*
- D. Guide to DRT*
- E. Transport Levy Financial Data.*

Background papers:

None

West of England Combined Authority Contact: Malcolm Parsons, Head of Capital Delivery

Appendix A – Supported Services Option

Awarded Services Spend based on local authority contribution to levy	Passenger Numbers	cppj	S106 Contributions	Levy contribution	Other Levy Contribution	BSOG	Net gain/(loss) for UA. Including revenue.
Bristol City Council							
10 Southmead Hospital - Avonmouth	143,523	£2.86	N/A	£1,334,000	£2,230,000	£448,348	£30,041
11 Southmead Hospital - Parkway	62,882	£5.73	N/A				
13 Bristol City Centre - Shirehampton	68,719	£7.57	N/A				
505 Long Ashton Park & Ride Site - Southmead Hospital	126,962	£5.12	N/A				
515 Stockwood – Hartcliffe	40,992	£6.65	N/A				
Brislington Park and Ride	344,090	£2.50	N/A				
Portway Park and Ride	396,588		N/A				
South Gloucestershire Council							
12 Severn Beach – Cribbs Causeway – Bristol Parkway	39,007	£9.49	N/A	£971,000	N/A	£464,709	-£10,391
16 Kingswood - Keynsham	145,233	£3.82	N/A				
19 Sunday	37,485	£1.80	N/A				
35 Marshfield - Kingswood	19,987	£8.51	N/A				
86 Yate – Emerson’s Green – Kingswood (Courtney Road)	40,497	£4.69	£190,000				
620 Old Sodbury – Yate – Bath Bus Station	35,316	£3.54	N/A				
Y6 Saturdays only	88,510	£1.01	N/A				
Y6 Sun/PH	9,732	£6.21	N/A				
Bath & Northeast Somerset							
2 Bath City Centre – Mulberry Park - Bath City Centre	13,835	£1.52	N/A	£780,000	N/A	£233,943	£264,272
6A Bath City Centre – Fairfield - Larkhill - Bath City Centre			N/A				
8 Bath City Centre - Kingsway	134,441	£1.52	N/A				
11 Bath City Centre – Bathampton, St Georges Hill	38,424	£2.67	N/A				
12 Bath City Centre- Haycombe Cemetery	31,520		N/A				

20 Bath Uni - Twerton	97,606	£5.00	N/A			
620 Old Sodbury – Yate – Bath Bus Station	35,316	£1.52	N/A			
700 Bath - Sion Hill	17,755	£8.55	N/A			
716 Bath Bus Station - Newbridge - Bath Manvers Street						
734 Bath Bus Station - Bathwick - Bath Bus Station						
779 Bath Manvers Street - Larkhall Square - Bath Bus Station						
R3 Weston - Ralph Allen School	12,350	£3.08	N/A			

Appendix B

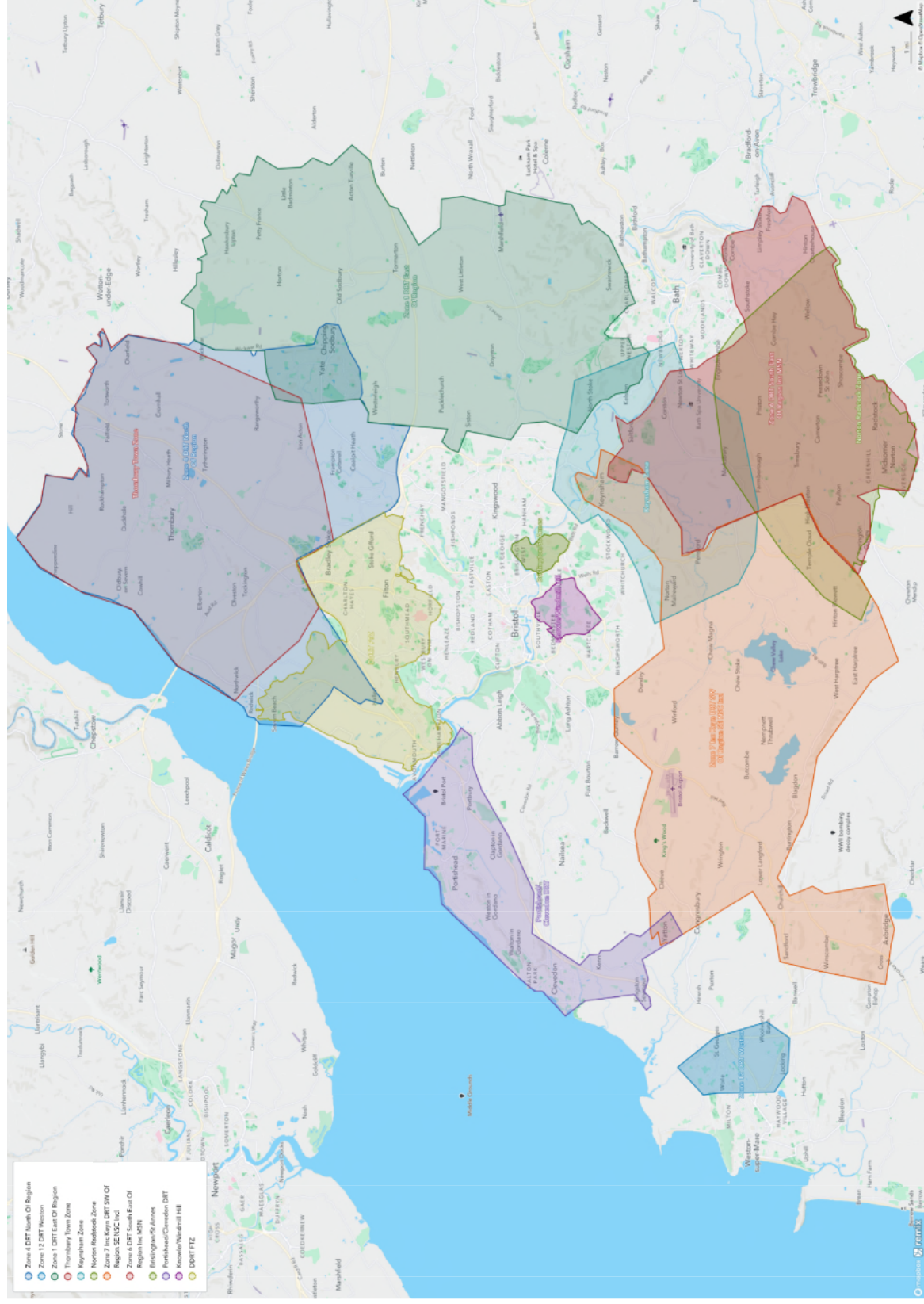
Supported Bus Services Tender, Long-list

Service	Route
2	Bath City Centre -Mulberry Park (Eves)
6A	Bath City Centre - Larkhall - Bath City Centre (Eves)
5	Bristol City Centre – Downend
8	Bath City Centre – Kingsway
10/11	Southmead Hospital – Avonmouth
10	Rock Street North and Hortham Village to Southmead Hospital
11	Bath City Centre – Bathampton
12	Bath City Centre - Haycombe Cemetery
12	Severn Beach - Bristol Parkway
12/622	Thornbury - Cribbs Causeway
13	Bristol City Centre - Shirehampton
16	Kingswood – Keynsham
17	Kingswood - Southmead Hospital
19	Bath - Cribbs Causeway via Bitton
20/4a	University of Bath circular
22	University of Bath to Twerton
35	Marshfield - Kingswood
52	Bristol City Centre - Hengrove
79	Marshfield - Bath Centre
82	Paulton - Radstock
84	Yate - Wotton-under-Edge - Yate
85	Yate - Wotton-under-Edge - Yate
86	Yate - Kingswood
172	Bath - Paulton
178	Brislington Park and Ride/Keynsham - Midsomer Norton
179	Midsomer Norton -Bath
202	Chipping Sodbury - Winterbourne
505	Long Ashton Park & Ride Site - Southmead Hospital
506	Bristol City Centre - Southmead Hospital
511	Bedminster - Hengrove
512	Totterdown - Bristol City Centre
513/514	Knowle - Brislington
515	Stockwood - Hartcliffe
516	Knowle - Hengrove Park
620	Old Sodbury - Bath

622	Chipping Sodbury - Cribbs Causeway
623	Severn Beach - Bristol Centre
626	Wotton-under-Edge - Bristol Centre
634	Tormarton - Kingswood
684	Wick-Keynsham
185	Hallatrow - Trowbridge
636	Hengrove - Keynsham
640	Bishop Sutton - Keynsham
668	Peasedown St John - Bristol
683	Keynsham - Wells
757	Combe Hay - Midsomer Norton
663	Somerdale - Chandag Road
664	Keynsham (Somerdale) - Saltford
665	Somerdale - Longmeadow Road
672	Bristol - Blagdon
680	North Yate - Filton College
700	Bath City Centre - Sion Hill
716	Bath City Centre - Newbridge
734	Bath City Centre - Bathwick
779	Bath City Centre - Gloucester Road
752	Hinton Blewett - Bath
754	Hinton Blewett - Radstock
768	Midsomer Norton - Bath
948	Pucklechurch - Sir Bernard Lovell Academy
963	Patchway - Winterbourne Academy
967	South Yate - Chipping Sodbury School
Bris/Port	Brislington and Portway P&R
FC1	Lansdown FareCar (shared taxi)
FC2	Wellow FareCar (shared taxi)
R3	Twerton - Bear Flat - Ralph Allen School
Y6	Yate - Southmead Hospital
Y6	Yate - Southmead Hospital
10/11	Southmead Hospital - Avonmouth
13	Bristol City Centre - Shirehampton
505	Long Ashton P&R – Southmead Hospital
506	Broadmead – Southmead Hospital
517	Chew Magna - Wells
518	Midsomer Norton - Radstock Link
519	Chocolate Quarter - High St - Charlton Road - Queens Road - High Street - Wellsway - Minsmere Road - High Street - Chocolate Quarter
520	Southmead - Longwell Green
521	Hengrove Park to Brislington

522	Brislington P&R - Paulton - Odd Down P&R
523	Brislington Circular
524	Long Ashton P&R – Hengrove Park via SBL
525	Emersons Green - Yate
526	Chew Valley Link
527	Chew Magna - Anchor Road

Appendix C – Demand responsive transport network



Appendix D

A guide to Demand responsive transport

Demand responsive transport (DRT) is a flexible service that provides shared transport to users who specify their desired location and time of pick-up and drop-off.

DRT can complement fixed route commercial public transport services and improve mobility in low-density areas and at low-demand times of day.

DRT can contribute to decarbonisation by replacing private car journeys and facilitating multi-modal travel (for example, linking users to a train station or fixed route bus services). It is important that DRT services are integrated into the local transport network to be effective.

To reduce the carbon dioxide (CO₂) emissions emitted per passenger per kilometre from a DRT service, operators can optimise routes using the latest technology, select vehicles with lower or zero tailpipe emissions and increase passenger occupancy levels.

DRT services have been implemented in the United Kingdom to improve social inclusivity and access to services, this will also be the case in the West of England Combined Authority region too.

This document is based on policy applicable to England.

What demand responsive transport (DRT) means

DRT services run without a set timetable and typically use smaller vehicles, for example 18-seater minibuses, than fixed route bus services.

DRT offers a flexible bus service (registered bus routes that can deviate from fixed routes).

1. Types of DRT Service

DRT Schemes can have a range of purposes

1.1. Addressing suppressed travel demand

Providing the opportunity for individuals to access a destination or service, such as for employment, education, healthcare or retail, or to connect to a transport hub to complete their journey. DRT can fill the gap where journeys cannot be walked or cycled and users do not have access to public transport or a car.

1.2. Transferring existing bus users to a DRT service

Providing a flexible service in place of a conventional fixed route service.

1.3. Acting as a feeder service to existing bus services or rail

This could include connecting rural areas with a fixed bus route. [Arup explored the potential of this option](#) for the UK.

1.4. Consolidating existing bus services

Enabling one service to meet multiple needs which may have been previously delivered through conventional bus services, such as home to school, home to healthcare and home to work journeys.

1.5. Providing an alternative to private car journeys

Encouraging non-users to use shared transport by providing a more flexible, attractive service. 'Hop on, hop off' services can also serve tourists, for example, to provide access to rural walks, attractions or services. Examples include Tees Flex, Essex DaRT and Connect2 Wiltshire.

Two main groups of DRT users were identified by [Knowledgebase on Sustainable Urban Land use and Transport](#) (KonSULT), a project led by the University of Leeds. They are:

- captive users: people who do not have a car (or other transport options) available for their journey. A DRT service targeting this group tends to have accessibility and social inclusion objectives
- choice users: people who use DRT even though they have a car available. Attracting these users is more likely to relieve congestion and contribute to decarbonisation.

Benefits of DRT

While the numerous social and economic benefits often prompt the introduction of a DRT service, it can also assist with decarbonising travel.

How DRT can reduce CO2 emissions?

- **Substitute car journeys**

A DRT service can replace multiple, single occupancy car journeys. For example, in a commuting area where there is not sufficient demand for a fixed route bus service or to serve those working shifts or flexibly.

Switching from a private petrol or diesel car to an electric DRT vehicle would enhance the emission reduction.

- **Encourage active travel**

As outlined in [Bus Back Better: national bus strategy for England](#), there is potential for bus and DRT services to better integrate with active travel, making non-car based, multi-modal journeys easier.

Some DRT booking services can decline very short trips that can be walked unless there is an overriding need, for example, due to a mobility impairment.

- **Replace a fixed route, diesel-fuelled bus service**

As a DRT service runs only when there is demand and on an optimised route, it may travel fewer miles overall than a fixed route service, reducing fuel consumption.

The size of the vehicle can be optimised to suit the anticipated number of passengers, lowering the CO2 emissions per passenger, per kilometre travelled, known as carbon efficiency.

General additional benefits of DRT

Introducing a DRT service can enable individuals to access education, employment and services in places where demand is dispersed, or the distances involved make it challenging to provide conventional services that meet the diverse needs of residents.

Financing is the greatest drawback due to the level of subsidy many services require.

Combined Authority potential additional benefits of DRT

Introduction of DRT within the region may positively contribute to the conventional bus driver shortages we've seen across the region. In some cases, DRT services can be operated under a different driver's license than larger public service vehicles. This has the potential to redirect drivers to our core bus service corridors.

Policy Benefits

DRT has the potential to deliver against multiple policy objectives, such as:

- Increasing patronage on core routes
- reducing congestion through modal shift to shared transport from private cars
- increasing connectivity for rural communities, for example, by extending public transport into areas where population densities and usage do not support a commercially operated timetabled service
- supporting health and wellbeing by enabling easier access to services, facilities, social networks and community initiatives
- economic benefits through increased access to employment, leisure and for visitors
- supporting the promotion of active travel as DRT reduces reliance on cars and may help to grow receptivity to alternatives to single occupancy vehicles
- promoting community cohesion through providing more opportunities for people to interact

Benefits to users

For users, DRT may be able to:

- act as a feeder service to connect to high frequency bus or rail corridors, reducing journey length and time, depending on the service
- enable travel at a more convenient time compared to a fixed timetable with limited frequency
- provide access to a wider range of destinations, increasing personal mobility and reducing social isolation
- provide a more convenient service that can support individuals with limited mobility
- help individuals and communities to access job opportunities through a direct service or services better suited to shift patterns

Implementing DRT: Bwcabus

[Bwcabus](#) in Wales was originally introduced to replace an existing bus service that had become unviable as traditional fixed route timetable based operations.

Since then, it has evolved to provide a feeder service to 3 Trawscymru strategic services as well as a zone of DRT provision within rural mid Wales.

It provides both fixed route and demand responsive bus routes that can be booked up to a month in advance. Fares are based on journey distance but can connect to other bus operators. Discounted tickets are also available, as are bus passes and some 'rover' tickets are valid on most bus services across 3 counties in Wales.

Benefits for the bus service provider, operator and the regional transport network

Providing a DRT service in place of a fixed route service can benefit by:

- enhancing data collection to aid understanding of demand for services
- enabling operators to run services only when there is known demand, reducing fuel costs (and empty running)
- providing access to a greater choice of ultra-low or zero emission transport options
- enabling adaptation of poorer performing conventional bus routes to maintain coverage

DRT services will be most effective when integrated with a mainstream network and are not the right solution in all circumstances. For example, there are unlikely to be benefits from replacing frequent urban and inter-urban routes.

Defining the zone of DRT operation

The area that a DRT service covers is known as a zone. The size of the zone can vary widely between services, reflecting:

- the purpose of the scheme
- the density of the population
- fleet size
- maximum wait times or journey times
- various other factors

Once a service is operational, the zone may need to be refined based on demand.

In defining zones, the Combined Authority in conjunction with the constituent Unitary Authorities considered:

- the main residential areas to be served
- significant destinations, such as employment zones, large employers, town centres, hospitals and healthcare sites, leisure attractions, transport interchanges
- existing passenger transport services

Our adopted approach for DRT providers, includes specifically using DRT as a feeder to existing fixed route services, enabled by the regions Bus Service Improvement Plan award.

Estimating demand for a DRT service

Data on demographic characteristics, travel behaviour and destinations within the proposed DRT zone have been used to estimate what the likely uptake of the service will be and the zonal cover.

Regulation

The proposed DRT schemes include flexible bus services - registered local bus services able to deviate from a fixed route.

Specifying a 'flexible bus service' will require it to be registered with the Office of the Traffic Commissioner.

Funding for DRT schemes

Nationally, DRT services are currently subsidised by local transport authorities.

Relying on short-term, external funding can be problematic if it leads to service withdrawal at the end of the funding period, resulting in users losing trust in alternative or future mobility schemes.

The region has some short term funding opportunities and options to fund DRT, these include

- **Bus Service Operators Grant**

[Bus Service Operators Grant](#) (BSOG): this is a grant paid to operators of eligible bus services and community transport organisations to help them recover some of their fuel costs.

- **Existing Unitary authority bus funding**

This may be appropriate where DRT could offer a more effective public transport solution than existing or conventional services.

- **Bus Service Improvement Plan**

The Combined Authority, with North Somerset Council, was successful in securing BSIP grant funding from Government. Our allocation includes £3m per annum specifically for DRT services.

Appendix E

Transport Levy Financial Data, and future forecasts

LEVY contribution by budget line

	B&NES	BCC	SGC	First Bus	Total LEVY	%			
	£000s	£000s	£000s	£000s	£000s	B&NES	BCC	SGC	First
Integrated Transport Team	239	456	161	0	856	28%	53%	19%	0%
Concessionary Travel	3,639	7,181	2,200	0	13,018	28%	55%	17%	0%
Bus Service Information (RTI)	143	269	142	25	580	25%	46%	25%	4%
Community Transport	367	841	445	0	1,653	22%	51%	27%	0%
Supported Bus Services	773	1,323	963	0	3,059	25%	43%	31%	0%
Metrobus	0	45	28	0	73	0%	62%	38%	0%
Travelwest	3	7	4	0	13	20%	51%	29%	0%
Bus Strategy / Integrated Ticketing	30	114	72	0	216	14%	53%	33%	0%
Sub Total:	5,194	10,235	4,014	25	19,468				

Future LEVY budget forecast – constant cash position.

	2022/23 Levy	2023/24 Levy	2024/25 Levy	2025/26 Levy	Cost per resident	Population data
Authority	£000s	£000s	£000s	£000s	£	
B&NES	5,194	5,194	5,194	5,194	26.86	193,400
BCC	10,235	10,235	10,235	10,235	21.67	472,400
SGC	4,014	4,014	4,014	4,014	13.82	290,400
Total Levy	19,443	19,443	19,443	19,443		
First Bus	25	25	25	25		
Total	19,468	19,468	19,468	19,468		

Concessionary Fares future year forecast

<u>2023/24 estimates</u>	Percentage of pre-COVID patronage (to aid forecasting)				
	65%	70%	75%	80%	85%
All operators on current rates	£7,976,116.21	£8,572,925.57	£9,169,837.91	£9,766,351.11	£10,360,036.43
Rate scenario 1	£9,358,027.27	£10,073,433.60	£10,788,979.04	£11,504,010.47	£12,219,404.67
Rate scenario 2	£9,775,795.75	£10,523,339.88	£11,271,026.00	£12,018,183.17	£12,765,714.03
Rate scenario 3	£10,193,564.23	£10,973,246.16	£11,753,072.96	£12,532,355.87	£13,312,023.39
<u>2024/25 estimates</u>	Percentage of pre-COVID patronage (to aid forecasting)				
	65%	70%	75%	80%	85%
Current rates (as 2023/24 +5%)	£8,374,922.02	£9,001,571.85	£9,628,329.81	£10,254,668.67	£10,878,038.25
Rate scenario 1 (as 2023/24 +5%)	£9,825,928.63	£10,577,105.28	£11,328,427.99	£12,079,210.99	£12,830,374.90
Rate scenario 2 (as 2023/24 +5%)	£10,264,585.54	£11,049,506.87	£11,834,577.30	£12,619,092.33	£13,403,999.73
Rate scenario 3 (as 2023/24 +5%)	£10,703,242.44	£11,521,908.47	£12,340,726.61	£13,158,973.66	£13,977,624.56
<u>2025/26 estimates</u>	Percentage of pre-COVID patronage (to aid forecasting)				
	65%	70%	75%	80%	85%
Current rates (as 2024/25 +5%)	£8,793,668.12	£9,451,650.44	£10,109,746.30	£10,767,402.10	£11,421,940.16
Rate scenario 1 (as 2024/25 +5%)	£10,317,225.07	£11,105,960.54	£11,894,849.39	£12,683,171.54	£13,471,893.65
Rate scenario 2 (as 2024/25 +5%)	£10,777,814.81	£11,601,982.22	£12,426,306.17	£13,250,046.94	£14,074,199.72
Rate scenario 3 (as 2024/25 +5%)	£11,238,404.56	£12,098,003.89	£12,957,762.94	£13,816,922.35	£14,676,505.79

<u>2026/27 estimates</u>	Percentage of pre-COVID patronage (to aid forecasting)				
	65%	70%	75%	80%	85%
Current rates (as 2025/26 +5%)	£9,233,351.53	£9,924,232.96	£10,615,233.61	£11,305,772.20	£11,993,037.17
Rate scenario 1 (as 2025/26 +5%)	£10,833,086.32	£11,661,258.57	£12,489,591.86	£13,317,330.12	£14,145,488.33
Rate scenario 2 (as 2025/26 +5%)	£11,316,705.56	£12,182,081.33	£13,047,621.47	£13,912,549.29	£14,777,909.70
Rate scenario 3 (as 2025/26 +5%)	£11,800,324.79	£12,702,904.09	£13,605,651.09	£14,507,768.46	£15,410,331.08

Potential initial Bus Network Investment – Bus Service Improvement Plan

Table below shows the proposed split of BSIP funding for all bus elements (DRT, BSIP supported services and Commercial Enhancements)	
BSIP Split by Unitary Authority	Totals
Bristol City Council	£ 704,729.89
South Gloucestershire Council	£ 3,288,049.48
Bath & Northeast Somerset Council	£ 2,337,091.46

Potential Bus Network Investment – All bus investment

Table below shows the proposed split of all bus funding for all bus elements (Supported, DRT, BSIP additional services and BSIP Commercial Enhancements)	
Funding Split by Unitary Authority	Totals
Bristol City Council	£ 4,747,119
South Gloucestershire Council	£ 4,903,367
Bath & Northeast Somerset Council	£ 3,615,306

APPENDIX 4

Email from Stagecoach

Liz Fitzgerald

From: [REDACTED]
Sent: 18 May 2023 11:37
To: Rebecca Lovell
Cc: Lee Stockford; Avril England
Subject: FW: 84/85 extension

Hi Rebecca,

As per your request – see the below response from Stagecoach on the potential to extend the 84/85 beyond the 3rd June. I am afraid that they are not able to support this.

Let me know your thoughts.

Regards

Ed

Edward Hopkins
Interim Transport Operations Manager
Job share with Avril England



Twitter: @WestofEnglandCA **LinkedIn:** West-of-England-Combined-Authority

From: [REDACTED]
Sent: [REDACTED]
To: Ed [REDACTED]
<James@westofenglandcombinedauthority.gov.uk>
Cc: Lee [REDACTED]
Subject: Re: 84/85 extension

Morning Ed

Hope you are well and keeping sane.

Could do with a catch up with you next week if you have time.

We have spent the last 24 hours trying to find ways to make this work however with our current vehicle and driver plan the extension of this contract will likely cause too much pressure on the other contracts we operate and therefore risk service delivery.

We are therefore not in a position to extend.

Kind Regards,
Karen

Karen Coventry

Commercial and Marketing Director

Stagecoach West and Oxford Tube

www.stagecoachbus.com

www.oxfordtube.com

Registered Offices:

Thames Transit Ltd. One Stockport Exchange, 20 Railway Road, Stockport, SK1 3SW (Registered in England No. 2272113)

Cheltenham & Gloucester Omnibus Company Ltd. One Stockport Exchange, 20 Railway Road, Stockport, SK1 3SW (Registered in England No. 01713578)

[Conditions of carriage](#) [Code of practice](#)

From: [James/SGC](#) <[james@sgc.co.uk](#)>

[Redacted]

Subject: 84/85 extension

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Please be careful opening attachments/links. If unsure, report as suspicious.

Report Suspicious

James/Karen;

We have been asked by SGC about the potential to extend the 84/85 for a further 3 to 4 months (current extension ends on 3rd June). Sorry to ask this at such a late date – SGC have got a new administration and want to look at this.

Can you advise whether this is something that stagecoach would be willing/able to do. And if so would this be under the existing extension costs? (I think this is £30k a month).

Sorry for the – but I need a response urgently. So if you can get back to me today it would be appreciated. Please give me a call to discuss if that would help

Regards

Ed

Edward Hopkins

Interim Transport Operations Manager
Job share with Avril England



Twitter: @WestofEnglandCA LinkedIn: West-of-England-Combined-Authority

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APPENDIX 5

SGC Committee Report July 2023

South Gloucestershire Council

REPORT TO: Leader of the Council and Cabinet Member for Regeneration, Planning and Infrastructure

EXTENSION OF BUS SERVICE 84/85 & 622

(Wards - Charfield, Chipping Sodbury & Cotswold Edge, Yate North, Yate Central, Frampton Cotterell, Pilning & Severn Beach, Severn Vale, Thornbury)

Purpose of Report

The purpose of this report is to approve the extension to the 84/85 bus service to April 2024; to approve the extension of the 622 bus service (School journey only) to the end of the 2023/24 academic year; to delegate the procurement of the extension to both bus services to the Executive Director for Place; and to make the necessary budget reallocation to fund the aforementioned services.

Recommendation

That the Leader of Council and Cabinet Member for Regeneration, Planning & Infrastructure be recommended to:

- i. Approve the extension to the 84/85 bus service to April 2024 at a cost of c£190k;*
- ii. Approve the extension of the 622 bus service to the end of the academic year 2023/24 at a cost of c.£60k;*
- iii. Delegate the procurement of the extensions to these two bus services to the Executive Director for Place.*
- iv. Approve the funding sources and reallocation of budgets totalling £250k to fund these services as set out under the financial implications of this report.*

Policy

1. Under the Devolution Deal the council has a joint power for supported bus services alongside the Transport Authority (West of England Combined Authority), the Transport Act 1985 (as amended) enables the Council/Transport Authority to run supported bus services which would not otherwise be provided commercially.

2. Passengers value buses. The West of England has a vision for bus services across the region that:
 - people can depend on;
 - are quick and reliable;
 - present a simple and easy to use network;
 - are accessible for everyone;
 - are safe and comfortable; and
 - offer value for money.
3. The current transport policy framework, agreed by all authorities, is set out in the Joint Local Transport Plan and Bus Strategy. An expanded bus service and less reliance on car travel is also vital to meeting our net zero carbon target by 2030 and our inclusive economy objectives. The BSIP sets out our targets on designated corridors to reduce bus journey times by 10%, ensure 95% of services run on time, return to pre-pandemic patronage by 2025 and continuing to grow beyond that.
4. The joint Bus Services Improvement Plan (BSIP), covering the Combined Authority and North Somerset Council, secured the second highest funding award in the country. This funding totals £105.5m over the three years 2022/23 to 2024/25. Of this, £57.5m is revenue funding for fare reductions and service improvements.

Background

5. On the 18th January 2023 the West of England Combined Authority (WECA) committee considered a report entitled Supported Bus Services: Contract Decisions. It approved the delegation to the Director of Infrastructure, in consultation with the Infrastructure Directors in the WECA constituent councils, the award of contracts to the bus operators in accordance with supported bus service contract option.
6. The result of this decision was a reduction in the number of supported services serving South Gloucestershire. A decision was taken as part of the budget report for 2023/24, approved by Full Council on 15th February 2023, to allocate £85,000 to continue to support the 84/85 and 622 services on a temporary basis.

The Issues

7. The 84/85 bus service operates from Yate to Wotton-under Edge provides the only public transport link from villages, such as Cromhall and Hawkesbury

Upton, to essential services in Wotton-under-Edge and Yate. The 84/85 bus service, which was due to end in April 23, was extended by 3 months and then subsequently extended again until the 27th August 23 in partnership with Gloucestershire County Council. The 622 service ended in April 23 but was extended to provide school only trips From Severn Beach to Castle School until the end of the academic year 22/23.

8. In order to continue these services an urgent decision is required to enable the continuation of the services and to meet the required notice periods of the Transport Authority. Under the Enhanced Partnership, the West of England Combined Authority (WECA) have two fixed service change dates per year in August and April. To meet the registration requirements, the operators must provide a minimum of 42 days' notice.
9. We continue to work with the WECA around the bus service issues and are awaiting further clarification on assessment of the application of Bus Service Improvement Funding to fund supported services, following a change in spending rules from DfT. The timescales for this do not align with the forthcoming change date and therefore would result in a break in service if this urgent decision is not taken.

Consultation

10. Consultation with bus operators and members has been undertaken. Community groups, including parents from impacted schools, have made helpful contributions to help understand the issues, which it has drawn to the attention of WECA, and drawn on in making this decision.

Equalities Considerations

11. The public sector equality duty created under the Equality Act 2010 means that public authorities must have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
12. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
13. The general equality duty therefore requires organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected in the design of policies and the delivery of services, including policies, and for these issues to be kept under review.
14. A comprehensive, accessible, and affordable bus network is vital to enabling people to access jobs, health, food, leisure and other services and opportunities. The overall aim of this report is to secure as many bus services as possible within the funding and other constraints to provide a coherent network across the region.
15. If the urgent proposals in this report are not approved two bus services will stop, leaving school children and residents unable to access their place of education, and community facilities that they require such as access to medical care and a pharmacy.
16. Whilst the urgent timescales have meant that a detailed equalities and inequalities analysis has not been possible it is known that certain parts of our communities (of place or interest) are disproportionately at risk of inequality. It is therefore likely that closure of the bus services will impact negatively on these parts of our community, increasing their inequalities further.
17. Members of our communities who are older, have underlying health conditions and disabilities are likely to be particularly negatively impacted by the loss of these services.
18. Analysis of the impact in South Gloucestershire of the financial pressures show that in addition to the impact on residents with disabilities and long term health conditions there is a significant impact on families with children, particularly single parents the largest proportion of which are women. Additional costs from the removal of the bus services to access schools and medical facilities are likely to place additional burdens on these parts of our communities.
19. Extending these services will help to support these members of our communities and will enable a detailed impact analysis of the decisions to stop the routes being developed to inform decision makers of the impacts and to consider any mitigating factors necessary.

Mark Pullin, Service Director – Community Development, (01454) 868480

Alternative Options Considered

20. The alternative option would be to not extend the services which would result in the services ceasing from August 27th for the 84/85 and the 21st July for the 622. The cessation of the 622 would result in between 35-45 school children being unable to access their school and the cessation of the 84/85 would prevent access by public transport to and from employment, education, health and other essential services and shopping. Being unable to access employment can bring wider impacts on families due to loss of income. Many of these communities would be left with considerable distances to travel to any other services in some cases using routes without paving or lighting.

Risk Assessment

Financial Implications (includes tax implications such as VAT)

21. The cost of the bus service extensions and associated funding sources are presented below:

Cost of bus extensions

84/85 Bus Service to April 2024	£190
622 Bus Service to the end of 2023/24	£60
	<hr/>
	£250

Funding sources

C.10% contribution to 84/85 service from Gloucestershire County Council	£18
Balance of inflationary budget for levies no longer required	£68

Reallocation of funding allocations in the 2023/24 Budget:

Release of funding identifying a solution to open-up the roundabout junction in Filton	£44
Reduction of Community Facilities budget	£70
Reduction of Thornbury Hospital Site business case funding	£50
	<hr/>
	£250

22. Gloucestershire County Council have committed to funding circa 10% of the cost of the 84/85 bus service as it is servicing residents in Wotton-Under-Edge; and there is £69k available from inflation on levies in 2023/24. The inflation

budget is now available following confirmation of final amounts from Coroners Service and other levying bodies during March 2023.

23. The funding allocations proposed for reallocation have been sourced following a review of all existing budgetary allocations in the 2023/24 budget to identify funding sources without firm expenditure commitments to allow release for funding these bus service extensions.
24. The funding set aside for identifying a solution to open up the roundabout junction in Filton is no longer required as the issue has been resolved without need for drawdown.
25. The Community Facilities allocation of £200k is to be reduced by £70k on the basis that commitments made to date remain supported and alternative options for funding are explored to release remaining funding to support a further pipeline of community centres.
26. The 2023/24 budget set aside £125k as an indicative allocation to support the NHS business case in producing their business case for the Thornbury Hospital Site at the appropriate point. At the current time it is not anticipated that the full allocation will be required and it has been reduced to £75k.

Nina Philippidis, Service Director – Finance (S151 Officer), (01454) 865140

Legal Implications

27. Under the Devolution Deal the Council retains a joint power with WECA, (Article 8(4) of the West of England Combined Authority Order 2017) to exercise the powers under section 63(4) of the Transport Act 1985, to:

“Secure the provision of such public passenger transport services as they consider it appropriate to secure to meet any public transport requirements within their area which would not in their view be met apart from any action taken by them for that purpose”
28. In order to determine whether it is appropriate to secure any specific service it is necessary to consider whether the identified bus services are necessary to meet a community and / or social need, and which would not otherwise be provided commercially. This report sets out that the identified bus service met key social needs by supporting children to access school and enabling the wider community to access key services.
29. The procurement of these services will be undertaken in line with the Councils procurement regulations.

Simon Banks - Deputy Monitoring Officer & Head of Legal Services, (01454) 863039

Human Resources Implications

30. There are no Human Resources implications arising directly from this report.

Claire Kerswill, Service Director Human Resources, (01454) 866348

Climate Emergency and Environmental Implications

31. This provision would enable the continued support of public transport accessibility to education and essential services. The alternative would be for existing passengers of these services to seek other travel solutions which are likely to be individual cars and therefore result in a net increase in emissions. While this decision is related to a short-term extension to existing services the council continues to work with WECA to ensure that vehicles are best in class.

Barry Wyatt, Climate and Nature Emergency Manager, (01454) 864602

Social Implications

32. The Council has a clear commitment to tackle inequalities and to support residents with the cost of living pressures and financial wellbeing more broadly. If the bus routes in this report are allowed to stop it is likely to have a negative impact on both of these areas as alternative transport is likely to be more expensive than the current provision, at a time when individuals can least afford it.

Mark Pullin, Service Director – Community Development, (01454) 868480

Economic Implications

33. The 84/85 bus service provides a key link enabling access to and the use of local services, facilities, high streets, and employment. Enabling journeys by

public transport to education supports working parents, with limited access to alternatives, to engage in employment.

Jon Severs, Head of Regeneration, (01454) 868202

Privacy Impact Assessment

34. A privacy impact assessment is not considered necessary.

Risks, Mitigations & Opportunities

35. The extension of these services is for a limited time only. There is a significant risk that there will be further call to extend these services at the point at which they are due to end. This risk will be mitigated as far as is possible by close working with WECA to make a case for the funding for these services into the future.

Reasons for Decision

36. The decision is required to enable the continuation of these services.

Author

Nigel Riglar – Executive Director of Place, (01454) 865810

Departmental Contact

Emma Blackham, Service Director Place Shaping, (01454) 864115

Background Papers

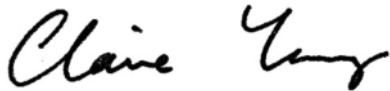
WECA Supported Bus Services: Contract Decisions 18th January 2023

[Bus Services Paper Final.pdf \(moderngov.co.uk\)](#)

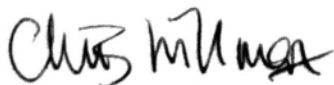
Decision Taken: Declarations**LEADER OF THE COUNCIL AND CABINET MEMBER FOR REGENERATION,
PLANNING AND INFRASTRUCTURE****REPORT TITLE: EXTENSION OF BUS SERVICE 84/85 & 622**

This decision is designated as urgent in accordance Standing Order 69 (5). The item could not be included on the 28 day notice Forward Plan because the council has received confirmation that the necessary registrations with the West of England Combined Authority need to have been actioned by the 21st July in order to continue the running of these services. The Chair of Scrutiny agreed to the Urgency and the Statutory Notice Published on the Website here [Statutory Notice](#)

Original recommendations as set out in the report approved without amendment.	Yes
Original recommendations amended, and decision as follows (including any reasons for the amended decision):	No*
I have a disclosable pecuniary interest, non-disclosable pecuniary interest, or non-pecuniary interest in this matter.	No*
If an interest is declared please give details below	



Councillor Claire Young
21 July 23



Councillor Chris Willmore
21 July 23



APPENDIX 6

Bus Driver Shortage Articles

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Bus driver shortage: Almost 1 in 10 positions vacant

🕒 4 November 2022



NORTH NORTHAMPTONSHIRE COUNCIL

By Emily Unia, Jonathan Fagg & Vanessa Fillis

BBC News

Almost 1 in 10 bus driver positions are vacant in the UK, driving a drop in the number of services, the Confederation of Passenger Transport (CPT) has said.

The group, which represents operators, is calling on the government to help increase the number of its drivers.

But low pay, long hours and shift patterns that leave drivers "exhausted" remain a barrier, the Unite union said.

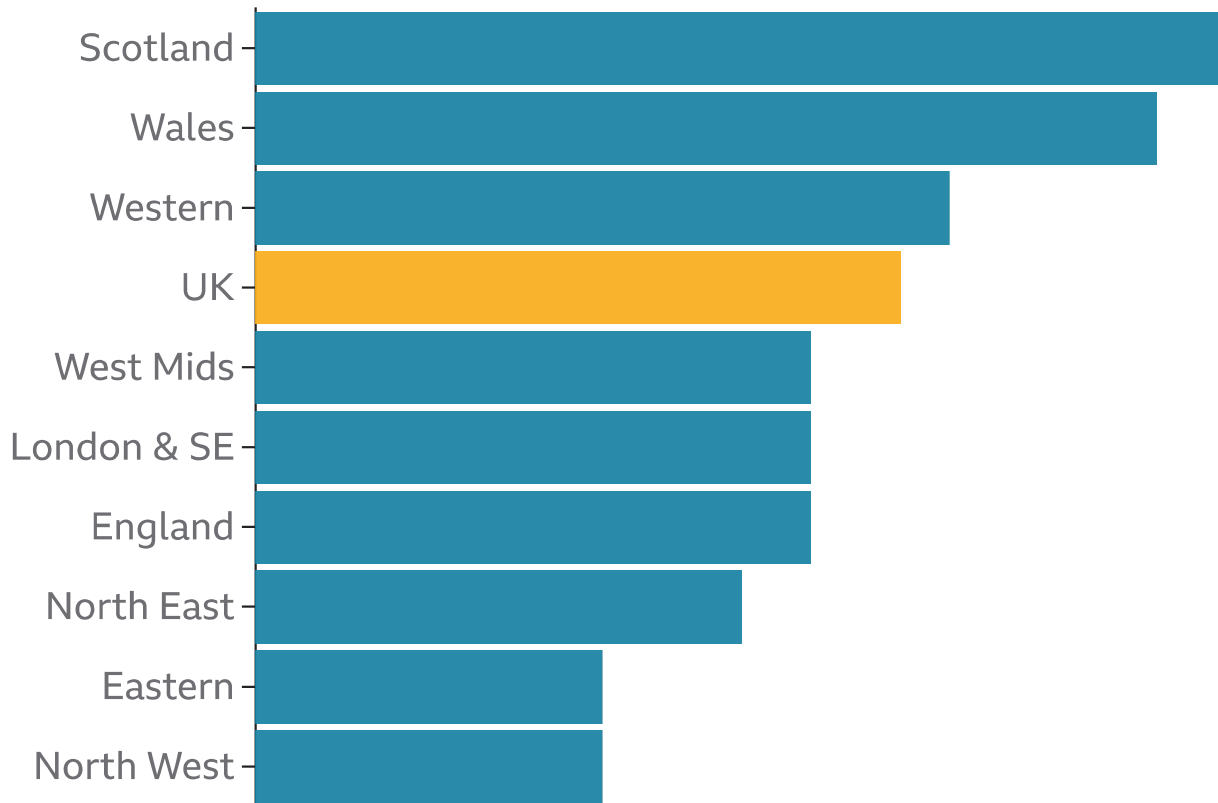
The Department for Transport (DfT) said it was working with the industry to attract and train drivers.

The CPT found Scotland had the greatest shortage of bus drivers, with 14% of positions vacant. In England, the West had the largest shortage.

Operators are "running hard to catch-up and fill the vacancies, but that's really difficult when the labour market is tighter than ever before", according to the group.

Bus driver shortage highest in Scotland

Percentage of bus driver roles that are vacant by nation and English region, as of September 2022



Source: Confederation of Passenger Transport (CPT)

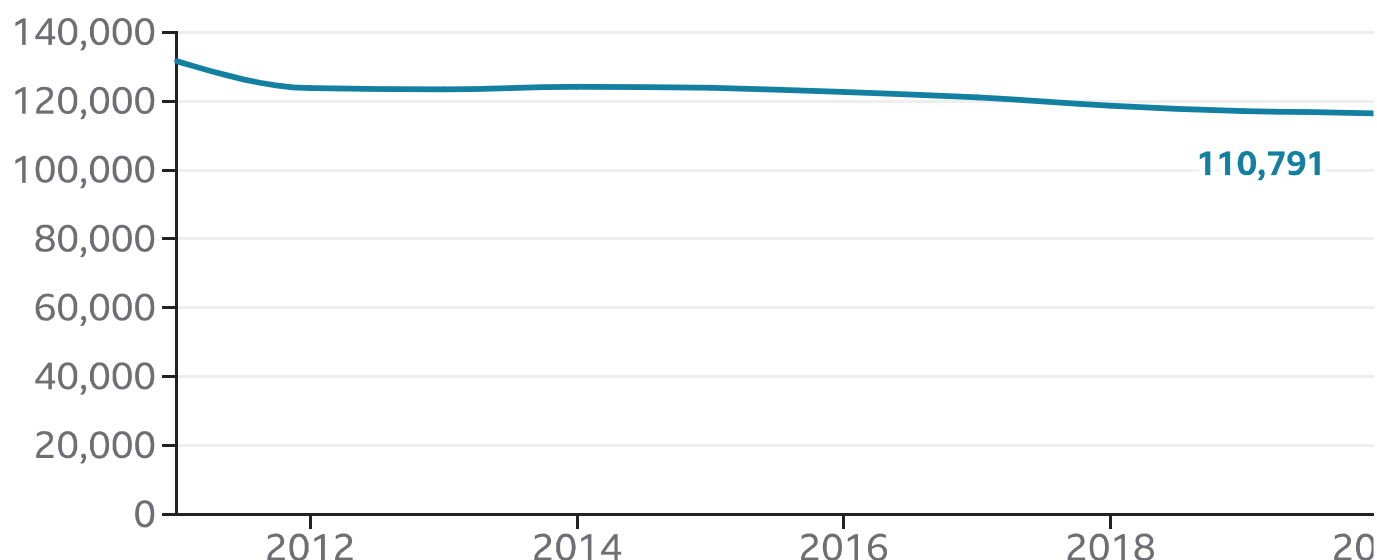
DfT data shows the number of people employed by local bus operators has been dropping. In March 2022, bus and coach companies employed 94,606 people across England. That is down 16% from March 2011.

This comes as the number of bus journeys are still below pre-pandemic levels. For the year ending June 2022, there were just over three billion local bus passenger journeys in England. That is up 55% from the year before, but is still down from over four billion in 2019.

Number of local bus employees is falling

Staff employed by local bus operators for areas across Great Britain since financial year ending 2011

Select an area: **Great Britain** ▼



Source: Department for Transport • Note: Data for full-time equivalent staff, covering operators who run local bus services, including those who also do non-local work (e.g. private hire, school contracts)

B B C

Pay for bus and coach drivers has also dropped. DfT data shows the median weekly wage in 2021 was £487.80 before tax. Adjusted for inflation, that is down 13% from 2018.

Unite national officer for passenger transport Bobby Morton described the figures as "disturbing but not surprising".






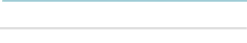




"Until bus companies address the problem of low pay, long hours and shift patterns that prevent workers having a decent family life and leave them exhausted then new drivers won't join the sector and existing workers will leave," said Mr Morton.

Data from the Driver & Vehicle Standards Agency (DVSA) shows 4,096 tests for driving passenger-carrying vehicles (PCVs) were conducted in the year ending March 2022. That is down 56% from five years earlier. During the Covid pandemic's first year, the number conducted dropped to 1,330.

Check test centres near you

Number of Passenger Carrying Vehicle (PCV) driving tests at centres Great Britain

Enter your nation or English region

Test centre	Tests in 2021-22	% Change in tests since 2016-17	Trend since 2016-17
Exeter LGV	16	-84	
Gosforth	16	-81	
Swindon LGV	26	-80	
Chevron (Flint)	26	-80	
Southampton LGV	43	-76	
Perth (Arran Road)	17	-74	
Yeading (London)	191	-74	
Guildford	64	-72	
Aberdeen North	24	-72	
Plymouth LGV	20	-71	

< 1 / 6 >

Source: DVSA

Go-Ahead's Oxford Bus Company plans to offer a £3,000 joining bonus for drivers who already have a PCV licence during a recruitment day this month.

The company told the BBC it was "also seeking specifically to broaden diversity in the bus driving community with recruitment campaigns aimed at women and at ethnic minority communities".



| Trainee bus drivers Peter Kriel and Norman Opie training with Stagecoach in Oxford.

Peter Kriel, a trainee bus driver with Stagecoach in Oxford, described joining the profession as the "best decision I've ever made".

His instructor Gemma Harrison said: "I don't think people think of bus driving as a career."

- **The UK's hidden transport crisis - seen from the number 16 bus**
- **Oxford bus driver shortage leaves services cancelled**
- **East Yorkshire driver shortage leads to reduced bus services**

Coach company National Express told the BBC that while it was "currently 7% down on bus drivers", it was offering increased pay, improved flexibility and shorter weeks.

The CPT has called on the government "to work with us to ensure the supply of labour is as big as it possibly can be".

"This might involve encouraging people to return to the workforce or recruiting from overseas, which could include adding bus and coach drivers to the shortage occupation list for a skilled worker's visa," a spokesperson said.

A DfT spokesperson said: "We continue to work with industry as they look to attract and train the workforce they need. To make recruitment easier, we have ramped up the capacity of vocational driving tests, including by bringing in additional examiners."

Related Topics

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16 February 2018



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Bristol bus operator First aims to tackle shortage of '200 bus drivers'

🕒 13 October 2022



WEST OF ENGLAND COMBINED AUTHORITY

| Metro Mayor Dan Norris said people need to be encouraged to use buses

By Clara Bullock

BBC News

A bus operator facing a shortage of drivers has joined forces with West of England Metro Mayor Dan Norris to try to help attract more recruits.

First West of England said it lacked about 200 bus drivers, leading to cancellations and service disruption.

Bus operators such as Stagecoach have been experiencing difficulties too.

First West said it had put "significant effort" into recruitment and Mr Norris said "sorting the driver shortage is a vital step to fix the bus network".

Doug Claringbold, managing director of First West of England, said: "We increased our salary by 14% earlier in the year.

"We're doing all that we can."

James, a former driver for the company from Bradley Stoke, told the BBC he would "love" to go back to First Bus and be a driver again.

However, he said he believed the company "have not learned anything yet".

"They're not working on driver retention, they're not trying to improve the conditions in the contract the drivers work under," he said.



FIRST WEST OF ENGLAND

A spokesperson for First West of England said its driver retention rate was better than before the Covid-19 pandemic.

"We greatly value our drivers and indeed all of our staff," they added.

"We are making concerted efforts to retain drivers and this work is already leading to improved retention levels.

"We recently opened a brand new and greatly improved drivers' rest area near Broad Quay in the centre of Bristol.

"We invested significantly in these modern facilities which also provide drivers with much greater access to managers and supervisors."

'Friendly and helpful'

Regular passengers say they are experiencing delays and cancellations due to the driver shortage.

Cat Ruffles, who is a bus user in Staple Hill, said services were important to her as a reliable alternative to cycling or having to drive into the centre.

The disruptions were making bus travel less reliable but Ms Ruffles said she thought the drivers were handling the situation well.

"You can imagine the amount of people asking the bus drivers questions and they handled it so well - they were polite, friendly and helpful," Ms Ruffles said.

Valerie in Frenchay used to rely heavily on the number 5 bus service, using it to go to Fishponds, where her dentist, doctor and hairdresser are.

That service has now been cancelled and replaced by the 47, which runs once an hour and does not go to Stapleton.

"One or two buses recently have not turned up," she said.

"But the drivers on the whole are friendly and helpful and are doing a difficult job."

APPENDIX 7

WSP Report

Wickwar – Alternative Bus Route Proposal Review

DATE:	29 September 2023	CONFIDENTIALITY:	Public
SUBJECT:	Review of report on alternative route proposed for 84/85		
PROJECT:	70116829 – Wickwar Bus Review	AUTHOR:	CG
CHECKED:	JDM	APPROVED:	TR

INTRODUCTION

South Gloucestershire Council has appointed WSP to review a technical note produced by NPR on behalf of Bloor Homes who have applied for planning consent to build 180 new homes along Sodbury Road, in Wickwar (see Figure 1), alongside a local shop and associated infrastructure. The NRP technical note sets out:

- Options for changes to bus services, and
- Forecasts for demand, revenue, and operating costs for preferred option.

NRP used the software package Podaris to model the demand of the new services, assessing changes in mode choices between the existing, alternative, and proposed routes. Outputs of these modelling exercises have then been used to predict patronage for the proposed service which have been used to model the financial viability of the scheme. *WSP commentary and conclusions are shown in blue text.*

Figure 1 Bloor Homes Development, Wickwar



Wickwar – Alternative Bus Route Proposal Review

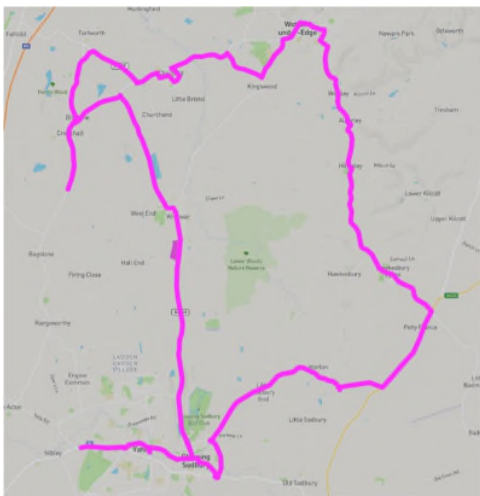
DATE:	29 September 2023	CONFIDENTIALITY:	Public
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Current Bus Market

The current bus service 84 and 85 runs between Yate and Wotton-under-Edge. It is operated by The Big Lemon and supported by South Gloucestershire Council under its powers under the Transport Act 1985 to secure “socially necessary” bus services where the commercial market does not do so.

The current 84/85 service, shown in Figure 2, is a circular route currently operating on a two-hourly frequency, currently on a round trip of 120 minutes. The service operates Monday to Friday and its full timetable can be seen in Appendix A. The 84 service operates clockwise with three daily departures from Yate Park and Ride (P&R) towards Wotton-under-Edge. The service then circulates back to Yate. The 85 service operates anticlockwise. The first service departs from Chipping Sodbury, and the remaining two depart from Yate P&R. All services terminate at Wotton-under-Edge and circulate back to Yate. The route follows the A432 east through Yate and Chipping Sodbury, then heading north along the B4060 into Wickwar. The service then heads north-west along Cowship Lane and the B4058 through Cromhall and Charfield via the B4059. The service then heads back south through Kingswood and rejoins the B4058 and B4060 into Wotton-under-Edge. The 84/54 continues through Wortley and Hawkesbury Upton and joining the A46 at Petty France and re-entering Chipping Sodbury via Horton Road. The service departs and terminates at the Yate P&R.

Figure 2 Current 84/85 route



Proposed Changes

NRP identified and assessed six options, with a view to considering financial viability, the population served and the overall diversity of the route. All route options would serve Charfield railway station, for which a planning application was approved in March 2023. Access to the station will be provided via B4058 / Wotton Road entering onto Station Road. A proposed bus stop and turning circle will provide access to the western platform. All the options are illustrated in Appendix B (plotted by WSP from the written routes included in the NRP technical note).

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NRP considered the following options:

- **Option 1** – This service commences at Yate railway station, heading east along the A382 and into Chipping Sodbury. The service then joins the B4060 via St Johns Way and follows the existing route into Wickwar, Cromhall and Charfield, where it would stop at Charfield railway station. This route then operates in reverse back to Yate railway station.
- **Option 2** – This service commences at Yate railway station, heading east along the A382 and into Chipping Sodbury. The service then joins the B4060 via St Johns Way and follows the existing route into Wickwar before turning east up the B4060 Station Road. This route serves Kingswood, before turning west into Charfield and entering the railway station. This route then operates in reverse back to Yate railway station.
- **Option 3** – This service commences at Yate railway station, heading east along the A382 and into Chipping Sodbury. The service then joins the B4060 via St Johns Way and follows the existing route into Wickwar, Cromhall and Charfield, where it would stop at the railway station. This route then continues east to serve Kingswood and heads southbound via the B4060 Station Road back to Yate.
- **Option 4** – This route commences at Yate railway station and heads east along the A432 before turning north along the B4059 and joining the B4060 at Peg Hill. The service then follows the existing route into Wickwar, Cromhall and Charfield, where it would stop at Charfield railway station. This route then continues east to serve Kingswood and heads southbound via the B4060 Station Road, through Wickwar and Chipping Sodbury and back to Yate.
- **Option 5** – This service commences at Yate railway station, heading east along the A382 and into Chipping Sodbury. The service then joins the B4060 via St Johns Way and follows the existing route into Wickwar before turning west up The Downs Road and into Charfield. This route enters Charfield railway station before continuing east along the B4058 into Kingswood and continuing northeast up into Wotton-under-Edge. This route then operates in reverse back to Yate railway station.
- **Option 6** - This service will commence at Yate railway station and head east along the A332 before turning north along the B4059 and joining the B4060 at Peg Hill. The service will then follow the existing route through Wickwar and Cromhall before entering Charfield and turning into the railway station. The service will exit the station and follow the B4062 into Kingswood, before re-joining the B4060 into Wotton-under-Edge and terminating at the Wotton-under-Edge War Memorial. This route will then operate in reverse back to Yate railway station, through Chipping Sodbury and stop at Chipping Sodbury school and Yate Shopping Centre.

The alternative route options proposed all serve the western section of the current 84/85 loop, without serving Hawkesbury Upton, Little Sodbury or the other dispersed settlements in the area.

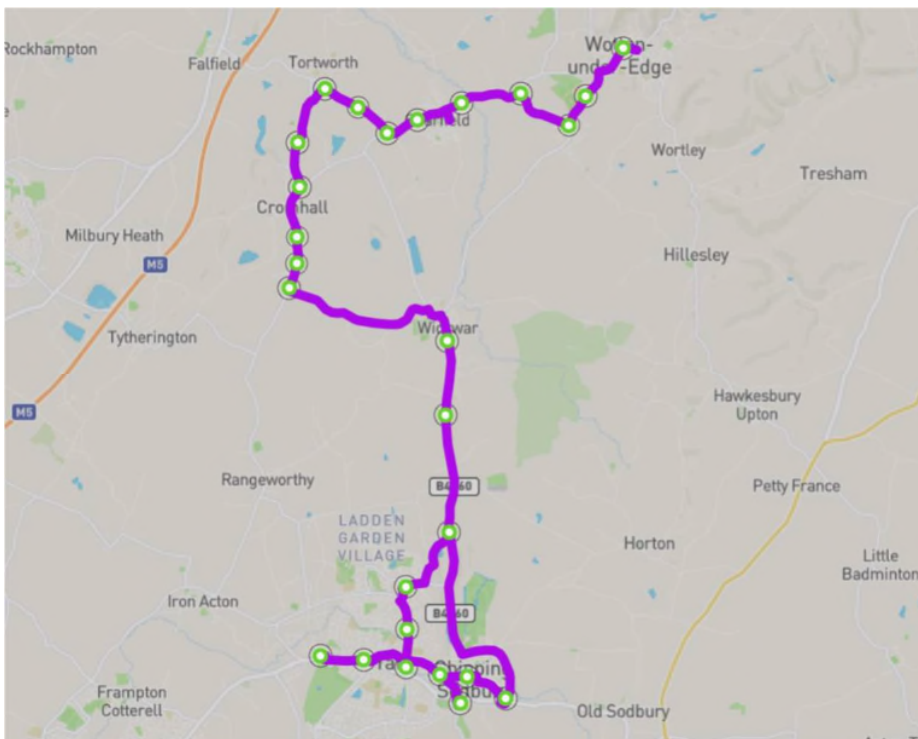
The preferred route chosen by the consultant was Option 6, shown in Figure 3. According to NRP, Option 6 offers both a diverse number of destinations and has a high impact on users. The proposed alternative will connect the development site to Yate, Chipping Sodbury, Cromhall, Charfield, Kingswood and Wotton-under-Edge, providing additional access to Yate and Charfield railway station.

Wickwar – Alternative Bus Route Proposal Review

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Of the options presented, Options 6 does indeed provide a balance between being operationally efficient while maintaining good service coverage.

Figure 3 Proposed Option 6



Demand Forecast

REVIEW OF ASSUMPTIONS

NRP used a Logit Model in Podaris to understand how the demand from the new service (including the new development) would change from the baseline (a two-hourly service) to the increased service options. The baseline model has as one output a 3.3% mode share for bus trips in the morning peak, which is validated against the 2011 Method of Travel to Work Census data which shows that 3% of people travelling to work did so by bus. *Logit model are standard transport planning tools. In order to provide a faster and more proportionate model architecture, Podaris conflates some modes of travel (e.g. driving a car and travelling as a car passenger), so this validation is reasonable.*

The development is considered in the model as 180 dwellings, each with the average occupancy of dwellings in the area. *Although this occupancy is not set out in NRP's note, it is a reasonable assumption that it matches the average household size from the 2011 census for the area of 2.5 people per dwelling.*

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According to the 2011 census, of 137,271 people who travelled to work in South Gloucestershire, 6,686 (4.87%) were trips made by bus, however this is heavily skewed towards Bristol. If we instead look at the Middle Super Output Areas (MSOAs) directly in the study area, the actual percentage of commuting by bus is 3.9% (725 out of 18,518 trips). It is reasonable therefore for the model to indicate a 3.3% mode share for bus in the base model. This is higher than the 1.6% the Transport Assessment for the development assumes – this difference is reasonable, as the proposal for the amended bus route would also pick up passengers along the rest of the route where the current bus network enables more trips.

For the preferred option considered, the model for the improved service results in an 8.73% bus mode share, an increase of 5.43 percentage points. In the appendix to NRP's note, this is shown as an increase from 58 commuters in the baseline to 160, an increase of 175%.

An increase in patronage of this level – more than doubling and approaching trebling – is extremely unusual in the UK public transport market. We suggest that a forecast increase of this magnitude requires unusual and strong evidence to support it. We have compared this level of ambition with the West of England Combined Authority Bus Service Improvement Plan (WECA BSIP) and with an economics-based elasticity approach:

- The WECA BSIP targets a return to pre-Covid patronage levels by 2025 and grow by a further 24% by 2030. The Plan includes investment of £105 million of BSIP-specific funding and an allocation of £406 million from the City Region Sustainable Transport Settlement. We include these figures to show that the level of patronage increase which the NRP proposal envisages typically requires substantial investment.*
- Elasticities of demand vary between different academic and research studies in transport economics, but tend to fall in the range of 0.3 to 0.7 in the short run, and 0.4 to 1.1 in the long run. This means that a 10% improvement in a service (which could, for example, be a 10% increase in speed, or a 10% decrease in fares) will typically cause a rise in patronage of between 3% and 7% over the first few years, and up to an 11% increase over five years. Doubling the frequency of a service (100% increase) might therefore see a 30%-70% increase in patronage in the first few years, as travel habits adjust. NRP's analysis takes the Stagecoach timetable from November 2020 as its start point, which shows 28 daily departures. NRP's proposed frequency gives 41 daily departures. This represents an increase in service of 46%, which might therefore lead to an increase in patronage of 14-32% over the first few years, and up to 51% after five years. This is considerably lower than the NRP estimate with its assumed 175% increase in the number of trips being made.*

It is also unclear if the demand modelling undertaken considers only the 84/85 service and its proposed alternatives or if it instead considers the full network picture in the area. As the consultant states in 3.2.1, they are not attributing trip extraction from other services to the financial viability of this service. There is not

Wickwar – Alternative Bus Route Proposal Review

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sufficient clarity provided on the model inputs used and what the increase in mode share is directly applicable to.

If the modelling considers only the 84/85 (current and future) in the analysis, and not the other bus routes, it is likely to over-estimate demand for the 84/85, as some residents in the study area will travel on other routes.

The analysis proceeds to say that commuting trips are 17% of all trips, which is referenced to the National Travel Survey.

The analysis then states that bus trips will increase by 5.43 percentage points (daily), which is the difference between the baseline mode share and the option 6 mode share and that therefore all-purpose bus trips will increase to a per-person rate of 3.2 per day. Further in the next section, paragraph 4.2.1 states that ‘the increase in commuter trips of 5.43% would result in a weekly increase in commuter trip rates of 0.543 per resident.’

However, the methodology behind this is not explained and therefore cannot be validated. It would appear that the percentage increase was multiplied by 10 to account for 5 return commuting trips a week, which is likely an overestimate, particularly as 30% of jobs in South Gloucestershire are part time (up to 30hrs a week).

The key weaknesses with the assumptions above are:

- *Inferring a trip rate generation for all residents from a percentage increase in commuting trips:*
 - *People travelling to work tend to make more trips than those who do not.*
 - *National Travel Survey 2022 results show that residents of England made an average of 677 trips per year (excluding walks of less than one mile), or 13 trips a week.*
 - *If it is assumed that a full-time worker makes 10 trips to and from work each week, it does not follow that these trips make up 17% of their total trips (which would mean a worker making 59 trips per week)*
 - *Therefore using commuting trip rates per person and extrapolating to all residents and all trip purposes significantly overestimates the likely bus patronage for the new service*
 - *At most, this percentage increase in bus commuting trips can be extrapolated to represent a percentage increase in all bus trips, however even this would assume that an increase in the attractiveness of bus for commuting purposes would be matched equally in the attractiveness of bus for other trip purposes.*
- *Assuming commuting trip occur 10 times a week, which particularly with part-time work and post-Covid travel patterns is not the case*

The Appendix also provides no clarity on the methodology followed to obtain 0.543 weekly commute trips which then generate the 3.2 weekly bus trips.

Appendix B of the NRP note shows an estimate of 19,159 bus trips per week on the new service, giving an and an annual total of 996,268.

Wickwar – Alternative Bus Route Proposal Review

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REVISED DEMAND FORECAST

The [Transport Assessment for the development](#) gives a total daily trip rate of 4.878 per dwelling (1.95 per person) across all modes.

This implies that each resident of the new development would make 13.65 trips per week (1.95 per day x 7 days), in line with National Travel Survey results. If 8.73% of these are made by bus, this would generate 1.19 trips by bus each week, and around 62 bus trips per person per year and a total of 27,900 bus trips per year.

Even this – which is far lower than the 3.2 bus trips per week NRP have calculated (166 per year) – is optimistic; National Travel Survey results for 2022 show residents of England outside London average around 23 bus trips per year, down from around 32 trips per year before Covid.

If we apply the rate of 32 bus trips per year to all residents in the catchment of the revised route we would see $32 \times 6,000 = 192,000$ trips per year. This does not take into account that some of those trips would be on other bus services in the area. This estimate of 192,000 is less than 20% of the overall NRP estimate of 996,268.

Revenue Forecast

REVIEW OF ASSUMPTIONS

In order to calculate the potential revenue of the new service, the report applies the 3.2 weekly bus trip rate (discussed above) to the population aged 5-59 within 400m of the service bus stops (4,200 people).

Assuming a £2.32 average fare, this results in a £31,106.42 weekly profit, £1,617,534.01 yearly profit.

The revenue forecast has the following weaknesses:

- *Assumes the 3.2 from the previous section is the trip rate – as stated, the methodology behind this is not clear and generates an unrealistic patronage forecast*
- *Assumes all those in 5-59 population are commuting / travelling for school. This does not account for any economic inactivity, which for South Gloucestershire stands at 15.1% for those between 16-64 (Nomis Labour Market Profile from ONS annual population survey, April 2022-March 2023)*
- *Risk of double counting travel to school. Travel to work makes up 17% of bus trips, with travel to education part of the other 83%. By including 5-18 year olds in the population segment who are travelling to work this overstates the commuting population, which then feeds through the extrapolation for non-commuting trips.*
- *The weekly profit is multiplied by 52 to obtain the annual one, which does not account for school or other holidays*
- *Considering the current bus market, a £2.32 average fare is likely to be an over-estimate, when taking into account concessionary fares, day passes, weekly passes etc. For the current service, a*

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child/student single is £1, an adult single is £2, an adult return £2.50, with regional multi-operator AvonRider day passes between £5.30-£7 and week passes £22.50-£30.

- *The report provided does not make any mention of current patronage data for the 84/85 service, which makes baselining the forecast number of trips exceedingly difficult*

REVISED REVENUE FORECAST

The NRP note does not set out what the revenue is on the current 84/85 service. This information is likely to be seen as commercially confidential by the current operator and may therefore not be available.

We have separated out potential revenue from the new development only and assumed that the enhanced bus service and any Travel Plan specific to the development will lead to the optimistic mode share being achieved (8.73% of commute trips being made by bus). This equates to a trip rate of 1.19 bus trips per person per week. From this we estimate revenue as follows:

- *180 houses with 2.5 average occupancy: 450 people*
- *Weekly bus trip rate of 1.19 per person: weekly 536 trips*
- *Weekly revenue (assuming average single fare of £2): £1,072*
- *Yearly revenue (assuming 50 weeks): £53,600*

As the current service is not operated commercially (no bus company currently operating is prepared to run it in the expectation of generating a surplus), it is unlikely the current annual revenue is higher than £100,000 (based on our experience advising other local transport authorities and bus operating companies). If, as discussed above, we optimistically assume a 2.64 increase in revenue from existing residents after service improvements, it could go up to £264,000. Furthermore, considering the potential additional revenue of £53,600 from the new development, the service could generate approximately £320,000 per year.

As a comparison, we have assessed the potential revenue from the new service, based on the pre-Covid national bus trip rate (from the 2019 National Travel Survey) and the populations in the walking catchment of the route. We estimate as follows:

- *Population within catchment: 6000 people*
- *Weekly bus trip rate of 0.62 per person: weekly 3720 trips*
- *Weekly revenue (assuming average single fare of £2): £7,440*
- *Yearly revenue: £386,880*

For simplicity we have not adjusted this to take account of:

- *potential use by residents of other bus routes in the area (which would reduce our estimate)*
- *trip rates in the 2022 National Travel Survey, which are notably lower than in the 2019 survey but affected by the Covid pandemic (which would also reduce our estimate, to approximately £275,000)*

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Operational Cost

REVIEW OF ASSUMPTIONS

The report produced by NRP information from the ONS and Stagecoach to calculate the operational cost:

- Bus drivers – wages of the drivers – derived from ONS 2020 SOC10 Table 3.5a Hourly Pay – Gross 2020
- Bus purchases - £200,000 paid over 15 years, information provided by Stagecoach
- Operating costs – £2.64 per Kilometre - ONS 2021 Table BUS0408a [per kilometre]

This results in a given cost of £1,472,921 per year for the service (£3.91 per kilometre).

This is an over-estimate of costs. The per-km rate in DfT Bus Statistics Table BUS04gi_km for 2022 (the same table used by NRP; DfT renumbered Bus Statistics tables in 2022) for a non-metropolitan area, £2.56 per km, covers all costs incurred by the bus operator, including driver wages and vehicle purchase, which therefore does not need to be added on.

REVISED OPERATIONAL COST

In order to obtain a more accurate estimate, WSP has used a more comprehensive cost model to understand the operational cost of running the proposed alternative route, as well as a benchmark for the current 84/85.

This cost model takes into account:

- *Vehicle cost*
- *Driving cost, including driver salary and cost to employer*
- *Maintenance costs*
- *Fuel costs*

CURRENT OPERATING COST FOR 84/85

Using the above cost model, the operating cost for the current 84/85 can be estimated at £183,059 pa, including the purchase of a vehicle over 10 years and 10% operator profit, which has been included for consistency.

OPERATING COST FOR PROPOSED ROUTE

The journey time given for this route is 79mins. This results in a return trip time of 158 minutes.

The service is proposed to operate at 30min frequency during peak time, and hourly outside of peak times, including Saturday and Sunday.

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The peak vehicle requirement (PVR) is the maximum number of buses and drivers needed out on the road at any one time to deliver the service. The NRP report includes a graph and calculation from Podaris software showing a PVR of 8 for the new service.

Our analysis, however, confirms that this is an over-estimate based on the 79-minute run time and half-hourly peak frequency. With the service frequency given, the service requires 6 vehicles to operate. This type of error can occur in Podaris if the speeds the vehicle is mapped at are not scrutinised (e.g. Podaris may be using an assumption that the bus travels more slowly than can be achieved in reality) or if the timetable has not been optimised for maximum operational efficiency.

Using the same cost model, WSP estimates that the annual cost to operate this service is £834,731, i.e., £139,122 per vehicle per year or £2.22 per km.

Our assessment, therefore, is that the NRP note over-estimates the annual operating cost of the service by approximately £638,000 (£1,472,921 against £834,731). We note, however, the costs in the bus industry are rising due to inflation, especially in fuel and wages, so our estimate may be optimistic.

Revised assessment

From the assessment above, we can see the cost of the alternative service at approximately £834,000 is around 4.5 times the cost of the current service.

Even if the revised service sees patronage and fare revenue increase by a factor of 2.64 (which we believe to be optimistic), the increased revenue of approximately £325,000 would still leave a significant operating deficit of approaching £500,000 per year for the foreseeable future.

As the current service is not operated commercially, it is unlikely the current revenue is higher than £100,000 pa. If, as discussed above, we optimistically assume a 2.5 increase in revenue after service improvements, it could go up to £250,000. Furthermore, considering the potential additional revenue of £53,600 from the new development, the service would operate with a deficit of approximately £500k per annum from its inception and for the foreseeable future.

This is confirmed using a bottom-up approach and our estimates of:

- *patronage – 192,000 trip per year, based on national levels of bus usage*
- *revenue – £386,880, based on an average fare yield of £2 per trip, and*
- *operating costs – £834,731*

where we calculate that the route would run at a deficit of approximately £448,000 per year and at a broadly similar level for the foreseeable future.

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Conclusion

This technical note has highlighted some fundamental gaps in the methodology outlined in the report provided, as well as some assumptions that do not appear to be clearly stated or backed up.

The main points the analysis fails are:

- *Lack of clear methodology for obtaining the bus trip rate*
- *The bus trip rate is then applied uniformly against too broad a segment of the population*
- *The average fare is over-estimated*
- *The cost of the service is over-estimated*
- *Modelling appears to analyse the new service in isolation from the rest of the bus network in the area*

The effects of these gaps are:

- *future patronage is, in our view, significantly over-estimated*
- *revenue is therefore significantly over-estimated*
- *operating costs are over-estimated, but not to the same degree as patronage and revenue*

Based on the information provided, we conclude that this service would be likely to operate at a significant deficit, possibly requiring a subsidy of around £450,000-£500,000 per year for the foreseeable future.

An alternative approach to this analysis would involve:

- 1 *Engaging with the current bus operator and analysis of automatic vehicle location (AVL) data to understand real-life running times and electronic ticket machine (ETM) data to understand patronage and trip distribution, i.e. how many trips are end to end*
- 2 *Understanding the cost of improving the service*
- 3 *Applying standard elasticities to current patronage, i.e. outside of the development to understand the effect of the new frequency AND new journey times*
- 4 *Estimating the revenue generated by the new development, ideally considering the build out rate and phasing of the service improvements*
- 5 *Using (2),(3) and (4) to understand the deficit or profit a new service proposal would have*

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Appendix A: Current 84/85 timetable



Route 84 (clockwise)

	84	84	84	84
	Sch	Sat/Sch	Hol	
Yate Park & Ride, Stop A	09:00	14:00	14:00	18:00
Yate, Yate Shopping Centre, Stop B, arr	09:10	14:10	14:10	18:10
Yate, Yate Shopping Centre, Stop B, dep	09:15	14:15	14:15	18:15
Chipping Sodbury School	-	-	-	-
Chipping Sodbury, The Clock	09:20	14:20	14:20	18:20
Wickwar, High Street	09:28	14:28	14:28	18:28
Cromhall, Longcross	09:38	14:38	14:38	18:38
Leyhill (S Gloucs), Leyhill Prison	09:41	14:41	14:41	18:41
Charfield, Berkeley Close	09:46	14:46	14:46	18:46
Charfield, Railway Tavern	09:49	14:49	14:49	18:49
Kingswood (Gloucs), Tennis Court	09:53	14:53	14:53	18:53
Katharine Lady Berkeley's School	09:55	15:00	14:55	18:55
Wotton-under-Edge, War Memorial, arr	10:00	15:05	15:00	19:00
Wotton-under-Edge, War Memorial, dep	10:05	15:10	15:10	19:05
Alderley, The Old Rectory	10:13	15:18	15:18	19:13
Hillesley, St Giles' Church	10:17	15:22	15:22	19:16
Hawkesbury Upton, The Fox Inn	10:23	15:28	15:28	19:22
Horton (S Gloucs), Horton School	10:33	15:38	15:38	19:30
Chipping Sodbury, The Boot	10:40	15:45	15:45	19:37
Chipping Sodbury, The Clock	10:42	15:47	15:47	19:40
Yate, Yate Shopping Centre, Stop B, arr	10:45	15:50	15:50	19:45
Yate, Yate Shopping Centre, Stop B, dep	10:50	15:55	15:55	19:50
Yate Park & Ride, Stop A	10:55	16:00	16:00	19:55

Route 85 (anticlockwise)

	85	85	85	85
	Sch	Sat/Sch	Hol	
Yate Park & Ride, Stop A	-	-	11:00	16:00
Yate, Yate Shopping Centre, Stop B	-	-	11:10	16:10
Yate, Yate Shopping Centre, Stop B	-	-	11:15	16:15
Chipping Sodbury, The Clock	-	-	11:18	16:18
Chipping Sodbury, The Boot	07:10	07:20	11:20	16:20
Horton (S Gloucs), Horton School	07:18	07:28	11:28	16:28
Hawkesbury Upton, The Fox Inn	07:27	07:37	11:37	16:37
Hillesley, St Giles' Church	07:33	07:43	11:43	16:43
Alderley, The Old Rectory	07:36	07:46	11:46	16:46
Wotton-under-Edge, War Memorial, arr	07:45	07:55	11:55	16:55
Wotton-under-Edge, War Memorial, dep	07:50	08:00	12:00	17:00
Katharine Lady Berkeley's School	07:55	-	-	-
Kingswood (Gloucs), Tennis Court	08:00	08:05	12:05	17:05
Charfield, Railway Tavern	08:04	08:09	12:09	17:09
Charfield, Berkeley Close	08:07	08:12	12:12	17:12
Leyhill (S Gloucs), Leyhill Prison	08:12	08:17	12:17	17:17
Cromhall, Longcross	08:16	08:21	12:21	17:21
Wickwar, High Street	08:26	08:31	12:31	17:31
Chipping Sodbury, The Clock	08:36	08:41	12:41	17:41
Chipping Sodbury School	08:41	-	-	-
Yate, Yate Shopping Centre, Stop B, arr	08:45	08:45	12:45	17:45
Yate, Yate Shopping Centre, Stop B, dep	08:50	08:50	12:50	17:50
Yate Park & Ride, Stop A	08:55	08:55	12:55	17:55

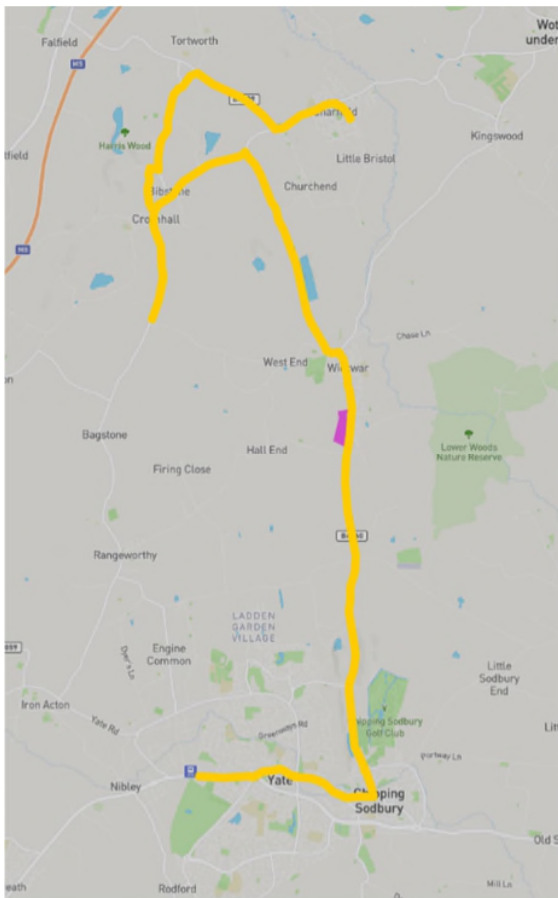
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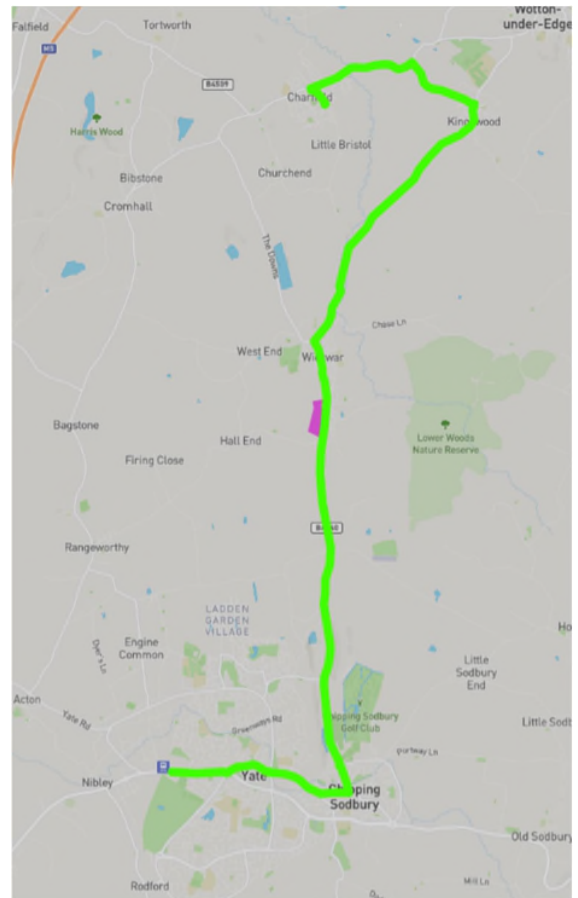
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Appendix B: Route options (plotted by WSP based on NRP descriptions)

Option 1



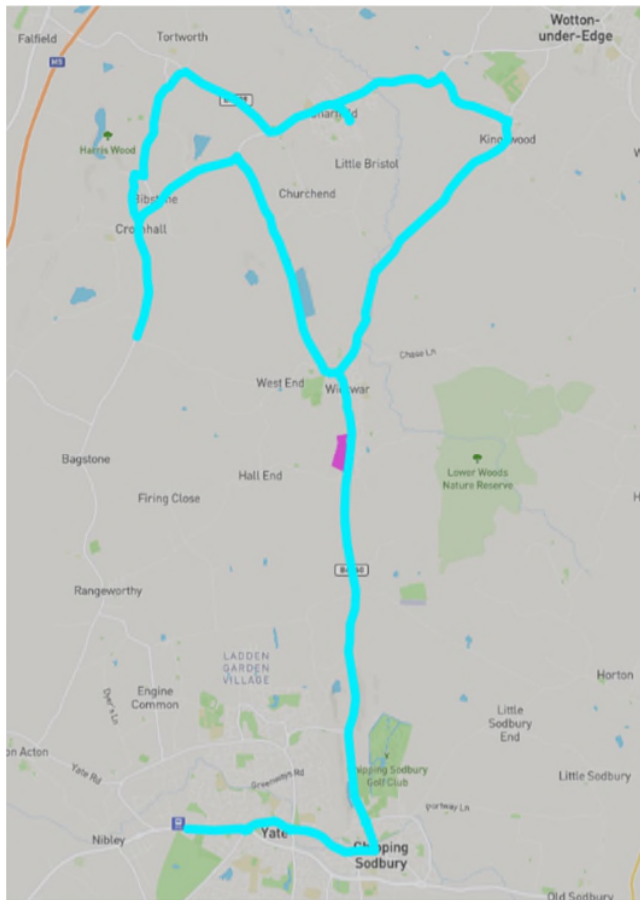
Option 2



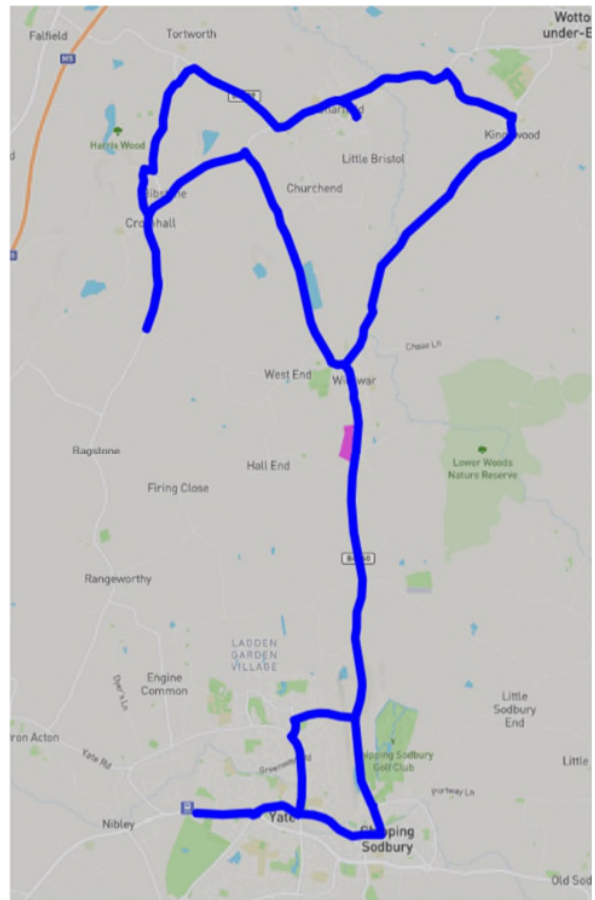
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Option 3



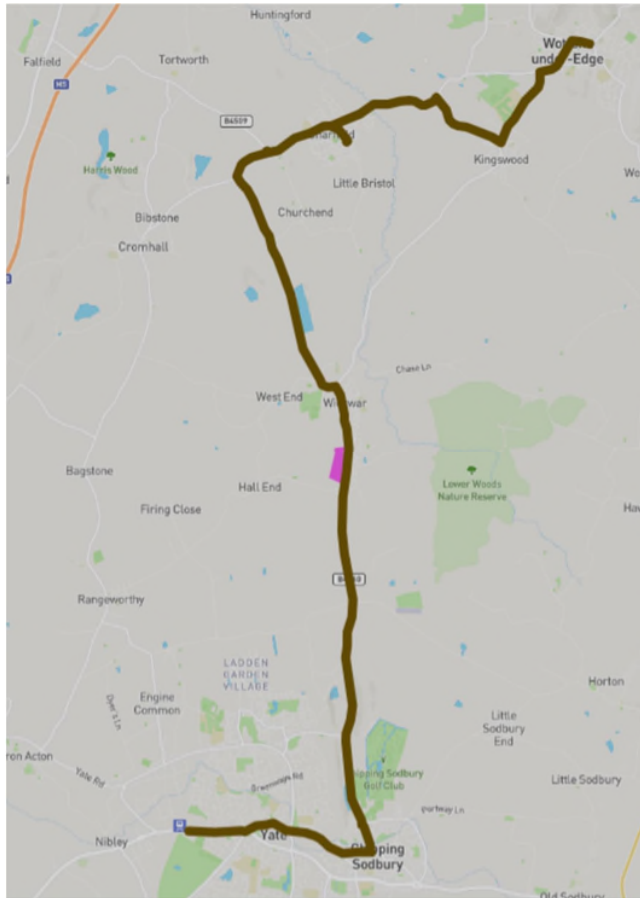
Option 4



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Option 5



Option 6

