Campaign for Better Transport

Objection to planning application for the South Bristol Link road 13/03108/F

Submitted to Bristol City Council and North Somerset Council (13/P/1204/F2)

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1. Councils have failed repeatedly to look at more strategic alternatives

Local campaigners Transport for Greater Bristol have campaigned for many years for an Integrated Transport Authority for the Greater Bristol area, and have proposed a range of alternative strategic plans for improving transport in Bristol. These have focused on rail improvements and tram, and, compared with these options, both Bus Rapid Transit and the SBLR are far inferior options in transport terms.

It is clear from this group's separate submission that the selection of the South Bristol Link, justified by Bus Rapid Transit, is not regarded locally as the best option, and that alternatives have not been adequately explored or put before the public for consideration.

Campaign for Better Transport's response to the DfT's 2011 consultation on the SBLR 'Best and Final Bid' for entry into the DfT's local major schemes funding programme highlighted the inadequacy of public consultation up to that point, and the lack of consideration of alternatives.

The key issue (which remains) is the rolling together of the road proposal with the BRT in all public presentations, which has prevented consideration of the road proposal itself, with many respondents believing the road is necessary in order to get public transport improvements. The submission from Transport for Greater Bristol Alliance shows clearly that this is not the case, and demonstrates the failings of the case for BRT.

The CfBT document from 2011 says[1]:

> "The residents of South Bristol have never been asked specifically about the South Bristol Link Road. In 2004 and 2006 the GBSTS consultation showed a new road as a vague dotted line which eventually emerged as the South Bristol Ring Road (3 stages). In 2007 stage 3 was dropped after public objections and the road was renamed 'the Link' and a BRT added. Now the promoters prefer to focus on the BRT element of the scheme, leaving many people to believe wrongly that the road itself has been dropped.
>
> This year, the West of England Partnership left it to a voluntary group (the Neighbourhood Planning Partnership) to organise two public meetings that included bus proposals as well as the road, and these were held outside the areas affected by the road, with no publicity for residents in the affected area."

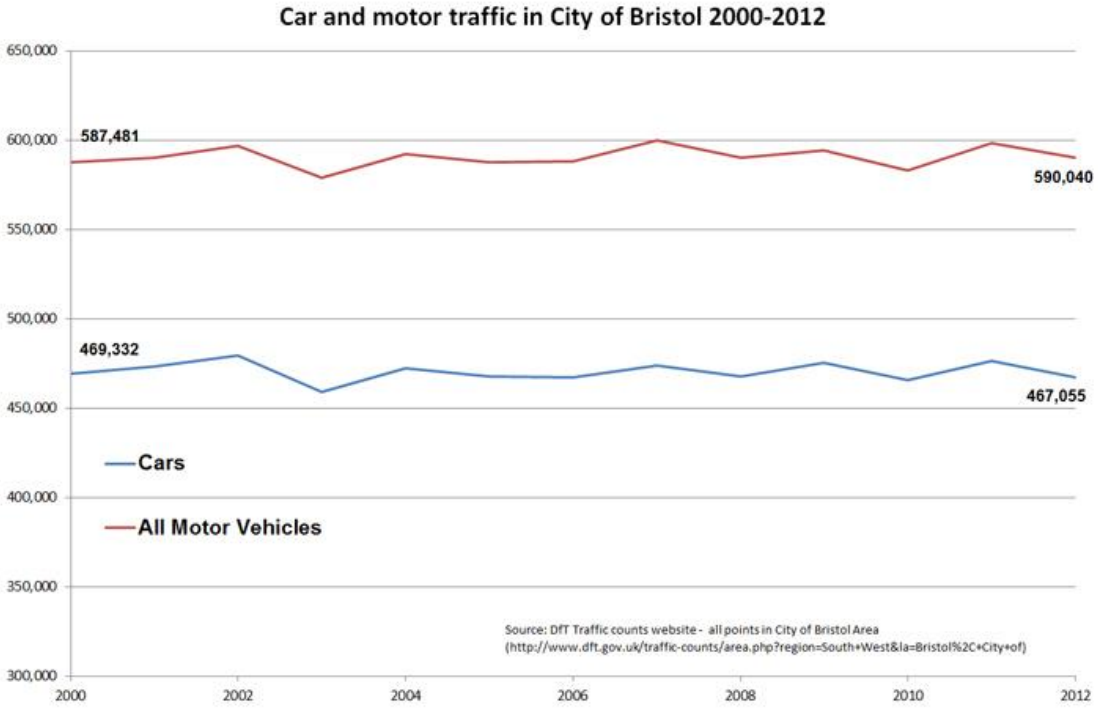
Our specific critique of the consultation process at this stage, which was also submitted to the DfT is also available online: http://www.bettertransport.org.uk/system/files/SBLRconsultationCfBT_Oct11.pdf

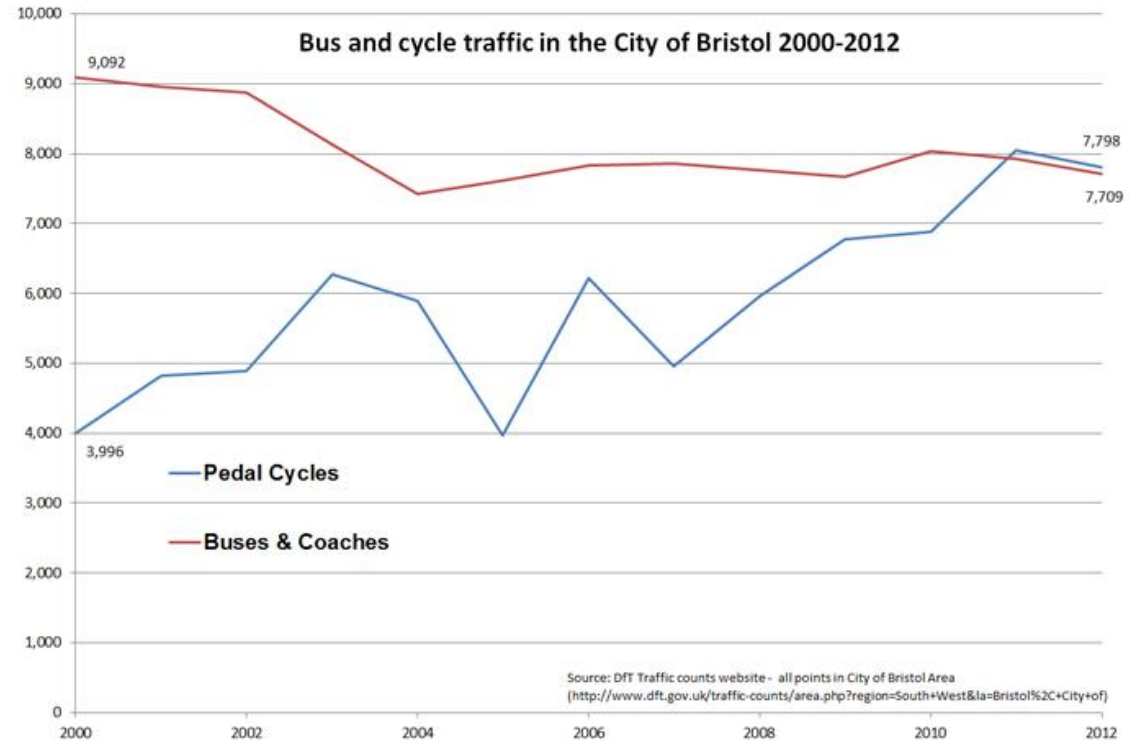
Since these flawed processes in 2011, no options other the SBLR have been put before the public. Option consideration for the SBLR must therefore be considered to be in breach of the required processes in the Treasury Green Book[2] and the DfT's WebTAG guidance.[3]

[1] http://www.bettertransport.org.uk/system/files/cbt-submission-development-pool-141011.pdf
[2] https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-governent
[3] http://www.dft.gov.uk/webtag/

2. Flat and falling traffic levels are an opportunity to promote other modes of transport

The two charts below show traffic volumes (in thousand vehicle miles for each year) across all DfT traffic count points in the City of Bristol area from 2000 to 2012.





This evidence shows that, from increasing, motor traffic in the area has been virtually flat over the past 12 years. Total traffic in 2012 (thousand vehicle miles) was 590,044 compared with 587,481 in 2000, while car

traffic was 467,055 in 2012, slightly lower than the 469,332 seen in 2000. Meanwhile, cycle traffic has risen rapidly in this time and, since 2011, more miles are covered by bicycles than by buses.

During all this time, traffic forecasts were predicting growth far ahead of what was seen, even in the years when traffic was increasing.

Instead of relying on outdated predictions of traffic growth to build a new road principally for car traffic (which would simply encourage more traffic), the positive trends seen in the charts above should prompt a stronger focus on non-car transport options that support further traffic reduction, including more public transport, cycling and walking.

As described by Transport for Greater Bristol Alliance in their submission:
"constructing this road would be an unsustainable backwards step"

The decision to add new road capacity to routes leading into already busy areas of Bristol (Transport for Greater Bristol Alliance highlights in their response that traffic to and from the SBLR pass through the existing pinch point of King George's Road) also runs contrary to the overall strategy of the city.

The Mayor has a range of policies that are seeking to reduce traffic in the city centre - among other things, looking at new parking controls and congestion charging. Encouraging more cars to drive into Bristol by building the SBLR will undermine these local policies and is a counterproductive use of public money.

3. Economic benefits of the scheme are based on very small time savings for drivers

The economic case for the road – particularly the cost-benefit claims – relies heavily on future growth in traffic based on forecasts using the same flawed methods and we do not believe these can be relied on.

At the stage of the Best and Final Bid for funding, it was highlighted by the consultants MTRU, who examined the bid, that the economic case for the road relies almost entirely on predictions of very small time savings for private car drivers.

In fact, more than 94% of the benefits at this point were from driver time savings of less than 2 minutes, with 5.6% of benefits from time savings of between 2 and 5 minutes, and just 0.2% of benefits from time savings over 5 minutes.

MTRU's report also pointed out[4]:

> "High dependence on small time savings makes them very vulnerable to minor errors or adjustments."

A similar reliance on small time savings appears again in the updated transport case for the road with this planning application, and form a large part of the arguments made in favour of the road. The Transport and Movement chapter of the Environmental Statement summarises these changes in journey times for a range of trips:

[4] http://www.bettertransport.org.uk/files/mtru-sblr-bafb-final_0.pdf

"8.6.41.
On the highway network the residential areas to the south of SBL see an average decrease of 43 seconds when making a journey to the city centre in the morning peak hour [by car] in 2016. By 2031 these journey time savings have further improved to a saving of nearly 4 minutes as the highway network north of SBL is less congested with the introduction of SBL (see Table 8.6).

Table 8.6: Change in journey times for highway traffic (seconds)

Route	2016			2031		
	AM	IP	PM	AM	IP	PM
Queens Road to City Centre	-43	-24	-34	-212	-193	-204
City Centre to Queens Road	8	13	-34	-40	-24	-65
Airport to City Centre	-18	-85	-4	-108	-135	-137
City Centre to Airport	15	-50	37	-13	-73	45
Cater Road to M5	-209	-89	-75	-420	-174	-200
M5 to Cater Road	-3	-23	-9	21	-23	-82

Table 8.7 of the statement gives similar estimates for public transport journeys:

"Table 8.7: Forecast average two-way journey time saving public transport in 2016 (seconds)

Average saving (minutes) [sic]	AM	IP	PM
Between south Bristol and City Centre	-71	-22	-28
Between Airport and City Centre	-352	-317	-278

It is important to note that only 6 of the 36 time savings given in the table are above 3 minutes, and that the reference to 'nearly 4 minutes' in passage 8.6.41 above appears to refer to four figures out of the 12 given for trips in 2031. These include three figures for a single journey from Queens Road to the City Centre (-212, -193 and -204 seconds for trips in the morning, interpeak and afternoon peak, respectively), two of which are much closer to 3 minutes than to 'nearly 4 minutes'. There is a single journey with a +5 minute time saving: the morning peak journey from Cater Road to the M5.

Very small time savings for private car drivers, alongside small time savings for public transport users and the very low standard of new cycling facilities (see section 5), are <u>not</u> consistent with a road that is claimed to provide major new connectivity and access for people across a range of modes.

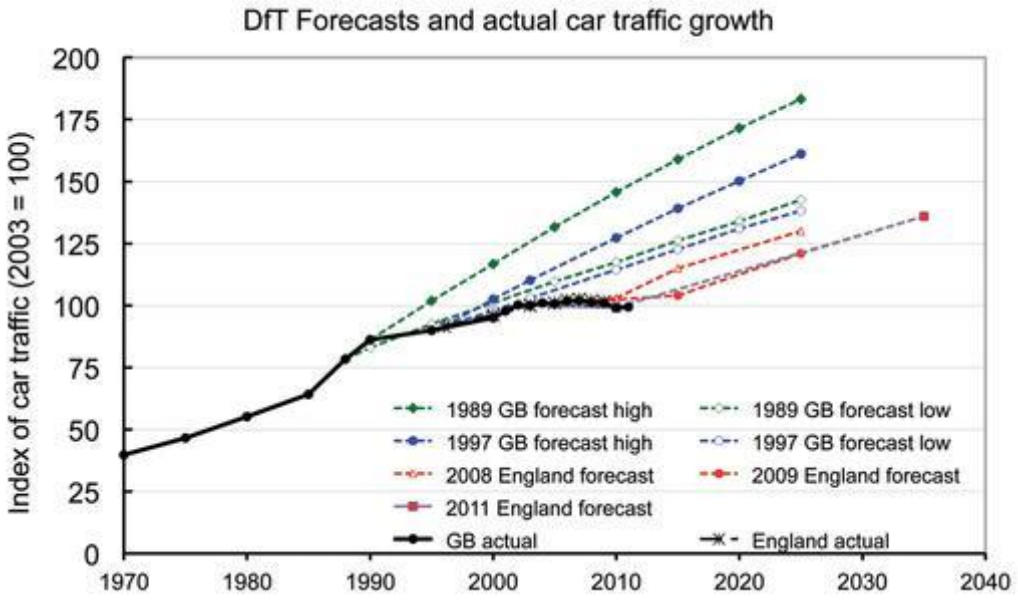
4. Economic benefits of the scheme rely on incorrect assumptions about future traffic

There is another reason why the small size of predicted time savings is important. Uncertainty around official traffic forecasts, which currently predict large increases in traffic over the coming decades, casts doubt upon whether even these small savings are realistic.

It is important to appreciate that each of the time 'savings' reported are compared with what is predicted to be the case with no road-building on the route of the SBLR, based on current traffic forecasts. So, what the assessment says about time savings becoming larger as time goes on ("as the highway network north of SBL is less congested") is very misleading. The longer 'savings' predicted for 2031 in table 8.6 are overwhelmingly due to traffic forecasts predicting higher background congestion in 2031, with which to compare the 'do something' situation of building the road.

In fact, as we show above, traffic levels in Bristol are not growing, with car and overall motor traffic now almost exactly the same as in 2000, so forecast predictions of high traffic growth are unlikely to be accurate, and this uncertainty grows as time goes on, making the 2031 predictions highly questionable. All this casts further doubt on the validity of relying on small time savings to make the economic case for the road.

There is clear evidence that national traffic forecasts for the UK have consistently over-estimated traffic growth. The chart below, reproduced from a recent article by Professor Phil Goodwin of UCL/UWE[5] shows this very clearly in a comparison of the actual traffic levels seen in England compared with forecasts made from 1989 to 2011. **There has been a large discrepancy between predicted and actual traffic since 1989, when traffic growth first started to flatten out (long before the current recession).**



This record of forecasts being proved wrong over several decades has now led to a near consensus among academics and transport and planning bodies that the methods and assumptions underlying the National Transport Model (NTM), which underlies the DfT's road traffic forecasts, need to be examined and revised in order to make the model and forecasts more accurate.

With a more realistic forecast of future traffic levels without the road, modelled time 'savings' due to the road would be much smaller, reducing or eliminating the economic case for the road.

[5] *Due diligence, traffic forecasts and pensions*, Goodwin P, LTT April 2012, http://www.bettertransport.org.uk/campaigns/roads-to-nowhere/ltt-130412 (free) and http://www.transportxtra.com/magazines/local_transport_today/news/?id=30378 (subscription)

5. Provision for cycling and walking is inadequate and doesn't follow current government policies

The proposed road is hardly 'cycle-proofed' as the government has recently announced as policy for all strategic road policies. The road will be accompanied by a 3 metre wide shared cycle/footway, which – as other objectors have noted is the absolute minimum recommended width for a two-way cycle track.[6] A combined cycle and footpath should be at least 5 metres wide for safe two-way traffic.

The provision of such poor cycling facilities on a new link, where far more space could be given to cycling if the promoters chose, is incompatible with Bristol City Council's status as Britain's first Cycling City, and its continued support by the Government as an exemplar city for promoting and providing for cycling.

In August 2013, a further £7.8 million was awarded to promote cycling, while this new road, generating new traffic on other streets while adding substandard facilities to the network will make cycling less attractive and more dangerous in the South of Bristol.

6. Building the road will encourage traffic and harm opportunities for active travel and exercise

As well as new traffic being introduced to the area on the SBLR itself, the new road will also increase traffic on a number of other roads and increase severance, and deter walking and the use of existing open spaces in the green belt.

The Open Spaces Society has set out in detail in its objection how the route of the road and the increase in traffic will have an adverse impact on walking and exercise activities across a wide area. The harm includes a huge impact from additional traffic on Highridge Common, reducing its amenity for play, walking and other activities associated with public health, as well as impact on the Community Forest Path, the South Bristol Circular Walk, and severance between the countryside and urban areas of Ashton Vale, Southville and Bedminster.

August 2013

Sian Berry
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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[6] *DfT Local Transport Note 2/08 Cycle Infrastructure Design (October 2008)*