



**Friends of
the Earth**

**Bath
Bristol
South Gloucestershire**

GREATER BRISTOL STRATEGIC TRANSPORT STUDY

COMMENTS ON ATKINS' PROPOSALS

OCTOBER 2005

Friends of the Earth welcomes the opportunity to comment on Atkin's emerging strategy for long term transport measures for the Greater Bristol area.

Strategic Environmental Assessment

We note that public consultation on the proposals, while it is welcome, is carried out on the basis of very limited information as to their effects and environmental impacts, and does not satisfy the requirements of European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment", (the "Strategic Environmental Assessment Directive").

The Directive specifies that "authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme" (Art. 6.1, 6.2). Such an environmental report does not yet exist, or at least not yet in any published form.

According to recent guidance from the Office of the Deputy Prime Minister, "The Directive requires responses to consultation to be taken into account during the preparation of the plan or programme and before its adoption or submission to a legislative procedure¹." The same guidance also notes that "Responsible Authorities must allow enough time for consultation when preparing for the plan or programme and the Environmental Report."

The consultation leaflet published in September this year states that "The Secretary of State for Transport and elected members of the local authorities will consider which schemes and measures should be taken forward", but it would be premature and, arguably, unlawful for any such decisions to be made before the requirements for Strategic Environmental Assessment had been met.

We would welcome an assurance that the relevant authorities are mindful of the provisions of the Directive, and an explanation as to how they are to be met.

This is far from being an academic point about process. From the way the study's recommendations have been reported it seems clear that measures have been prioritised largely on the basis of their Benefit Cost Ratio and their contribution to reducing congestion. Wider sustainability issues appear to have been poorly integrated into the study process. In consequence it is not surprising to find that the overall strategy performs poorly against high level sustainability objectives, and that some individual proposals which are

¹ A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, September 2005



highly contentious in terms of their environmental or social impacts are nevertheless recommended for taking forward.

Carbon Dioxide (CO₂) Emissions

There is a wide ranging scientific consensus that our climate is changing and that these changes will intensify with potentially catastrophic implications for economies, human societies and natural environments all over the world. The government has set or agreed a number of targets to reduce releases of greenhouse gases. These include reducing carbon dioxide emissions 'by some 60 per cent by about 2050 with real progress by 2020', as recommended by the Royal Commission on Environmental Pollution (The Energy White Paper 2003).

Planning Policy Statement 1 requires strategic planning authorities to reduce the threat of climate change by adopting measures to 'reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development'²

The importance of such action was re-emphasised in a speech by Elliot Morley, Climate Change and Environment Minister, who said:

"Local action to combat climate change is essential. I am keen that local and regional authorities should help to tackle greenhouse gas emissions"³

The emerging Draft Regional Spatial Strategy (RSS) for the South West includes commitments to reduce greenhouse gas emissions as follows:

"1.6 A More Sustainable Region

The region has a role to play in helping the UK move to a low carbon economy and achieve significantly reduced emissions.

Local authorities, regional agencies and others should include policies and proposals in their strategies, plans and programmes to reduce the region's greenhouse gas emissions year-on-year in line with government's national targets and long-term aspirations."⁴

The Draft goes on to observe that:

"Transport, which is responsible for 25% of UK emissions, is a priority area where the strategy needs to deliver reductions in emissions..."

Likewise the draft Regional Economic Strategy proposes that "the Region reduces its environmental 'footprint' by adopting a low carbon approach to economic development".

These policy statements are, by any standard, high level and overarching imperatives which it is essential for any major regional strategy to embrace. Atkins' draft proposals, however, fail to meet the test. Even with the full range of proposed measures implemented, the forecast result is that by 2031 CO₂ emissions would be some 25% higher than in 2003. While this is an improvement on the "do minimum" scenario of a 33% increase, it is still a very significant move in completely the wrong direction.

It might be argued that the West of England sub region, with its projected high growth, could be allowed an increase in emissions on the grounds that they can be compensated for elsewhere. The emerging Draft RSS gives no comfort to such a view:

"Fundamental to the achievement of a more sustainable region is the need to ensure that in future the need to travel is reduced by creative planning of development; ensuring that the effects of traffic on the region's roads are mitigated by wise investment in increased public transport and infrastructure; and by management of demand in congested areas. In the larger urban centres, over time, the requirements of individuals to travel will be catered for increasingly by better and more reliable public transport, supported by demand management measures. In the more rural parts of the region, reliance on car transport will continue to be high".

The implication here is clear – it is the urban areas that should be leading the way in reducing emissions.

² PPS 1 section 13 (ii) ODPM 2005

³ DEFRA press notice 466/05, 21st October 2005

⁴ South West Regional Assembly, Draft RSS Section 1, October 2005

The scale of the problem is easily summarised: in 2003 emissions from road transport in the West of England sub region are of the order of 2 million tonnes CO₂ per annum out of an estimated total of 7.7 million tonnes from all sources (DEFRA, 2005). By 2031, in order to be on track for the Government's target of a 60% reduction by 2050, total allowable emissions for the sub region would be just over 5 million tonnes. Emissions from road transport by then, however, even with Atkins' proposed measures in place, would have risen to over 2.5 million tonnes, more than half the allowable total, as compared to a quarter of emissions today.

The gulf between what the strategy would deliver and what is needed to reduce the risk of catastrophic climate change is therefore extremely wide. It leads inescapably to the conclusion that this is not a strategy that is basically correct but needs just a bit of tweaking; rather it is a strategy that is fundamentally flawed and at odds with the demands of sustainability.

Given that it is not clear how the proposals need to be amended to comply with this most fundamental of sustainability requirements, it would be dangerous to commit to any elements that increase CO₂ emissions without that full understanding.

Motorway Widening

Friends of the Earth is particularly concerned at proposals for motorway widening. There may well be a strong temptation to bring these forward for early delivery. As schemes on the national road network (i.e. M4 and M5) they would not have to compete with other regional aspirations for the Regional Funding Allocation, and they may well not require full planning procedures. Yet in their contribution to the sustainability of travel in the region's largest urban area, they could be almost wholly counter-productive.

We are concerned that the strategic motorway network near Bristol is being compromised by congestion caused by local traffic. The M5 between junctions 15 and 19 and the M4 between junctions 19 and 20 are often badly congested at peak hours because of local people travelling to work. The M5 at Cribbs Causeway, junction 17, is also badly congested at peak shopping hours, especially in the months before Christmas. Long stationary queues on the motorways are a common feature at these times.

We feel strongly that the solution to these problems is not to increase capacity by widening or improving junctions. This will simply encourage more local traffic to use these roads and the congestion will quickly return. A potential solution is to have fewer junctions in the Bristol area. If M5 junctions 16 and 17 were closed at peak hours, then most of the local traffic would be removed. Experience shows that closing roads in this way makes traffic disappear, because drivers will cease making unnecessary journeys. We also note that there is pressure to add more motorway junctions in this area, and we urge that this pressure is resisted absolutely. Adding extra junctions would significantly add to the local journeys made and put more pressure on the strategic network.

New Road Schemes

Increasing emissions are not the only concern arising from the road schemes in Atkins' proposals. They also threaten significant damage to the fabric of urban areas and the surrounding rural hinterland. Our concerns with specific schemes are:

South Bristol Ring Road: increasing orbital journeys (as acknowledged by the consultants); severance, noise and air quality impacts from a major urban dual carriageway through Hartcliffe, Whitchurch, Bishopsworth and Highridge; loss of open green belt land in Stockwood Vale, at Highridge Common and in Whitchurch and Long Ashton Green Belt.

A36 – A46 link: major adverse landscape impact on green belt, Cotswold AONB and setting of Bath World Heritage Site; traffic induction on A46 north of Swainswick and A36 in Limpley Stoke valley; increased traffic pressure throughout A36 corridor contrary to regional policy which has recognised that this is not a strategic route; lack of any proposal for public transport alternative between West Wiltshire towns and Bath.

Nailsea Bypass: significant adverse landscape impact in green belt; noise and visual intrusion at Tyntesfield estate, a flagship National Trust property; construction on floodplain and potential adverse impact on rhynes designated as Sites of Special Scientific Interest.

In respect of road schemes overall, we are concerned that the net effect of the proposals would be to spread congestion, geographically and in time. Results for the morning peak on strategic routes are predicted to be beneficial, compared with a "do minimum" approach, but it is not clear what the knock-on effects of this would be elsewhere or at other times. In presenting the results of the strategy, there has

been in our view an undue emphasis on the implications for the quality of life of car drivers, at unknown costs for the quality of life of everyone else!

Smarter Choices

We welcome the work that Atkins have produced on these and note the potential for significant gains. Revenue funding for smarter choices has been highlighted as a key issue.

All of the following measures have already been successful at reducing car travel and need to be greatly expanded: workplace, school and personal travel plans, car clubs, car sharing, teleworking, flexible working, improved travel information and joint working between Local Authorities and transport providers.

We would welcome further proposals for the funding of “smarter choices” to be locked in to transport strategies so as to guarantee their long term viability.

Public Transport

Friends of the Earth welcomes the emphasis on public transport throughout the study. We strongly believe that Bristol needs to make a step-change away from being a car-borne city. The proposed improvements to the public transport network will go some way towards providing a realistic alternative to driving. We believe the key elements of a sustainable transport strategy are the rapid transit, the showcase bus routes and congestion charging.

The study shows that the proposed public transport improvements are only sufficient to prevent significant growth of traffic in the study period. In order to achieve a long-term modal change, these measures need to be accompanied by other measures to deter driving, such as a reduction in the road network capacity, increased parking charges, workplace parking charges, cordon user charges and congestion charges.

Significant spending is needed to achieve step change, and we urge that a clear commitment is made to focus on improvements in the public transport network at the expense of other road improvements.

Charging

We strongly support the introduction of congestion or cordon charging and workplace parking charges and increased public parking charges. Experience in London shows that these charges deter unnecessary car journeys, and make public transport relatively much more attractive.

The combination of this charging with significant public transport improvements could provide a sustainable step-change in Bristol's transport. The improvements to the public transport network make the charges more politically acceptable. The charges provide an income stream to implement and continue the improvements.

We believe there is substantial public support for such charging provided that there is a real public transport alternative to the car and provided the money is spent on public transport improvements.

Charging regimes should be investigated with a view to reducing CO₂ emissions from road transport in the study area, not just reducing congestion.

Rapid transit

We strongly support the proposals for a rapid transit network. This is one of the key elements of the proposals and should be implemented as soon as possible. If a step-change is to be achieved then a fast, frequent and reliable public transport network is needed. Reliability and high frequency are the two most important features that will encourage use of such services. This cannot be achieved by conventional buses without some segregation away from private traffic, because congestion will impact on the reliability.

To attract significant traffic, the rapid transit network also needs good coverage of the built up area. The four proposed routes give relatively sparse coverage, and we strongly recommend that a commitment is made to add to the proposed network at the earliest opportunity, preferably before 2031.

The study consultation document does not specify the form of the rapid transit. While Light Rail is often perceived as having higher status, a guided bus system would be more flexible if the buses were capable of driving on ordinary roads. Much care is needed with the design of either system to avoid danger and nuisance for cyclists. Heavy concentrations of diesel powered vehicles have an unwelcome impact on the quality of urban areas, so we strongly recommend that either system should be electrically powered or use other forms of traction that are emission free and quiet at the point of use.

We strongly support the use of the existing M32 as a rapid transit and bus corridor, segregated from other traffic. This has the double advantage of improving public transport services and reducing the road capacity.

In the view of Friends of the Earth, the existing railway lines to Severn Beach and Portishead should be converted to light rail.

There would appear to be limited benefit from converting the Severn Beach line to a guided bus. A frequent rail service, possibly light rail, about every 5 or 10 minutes between Montpelier and Avonmouth would be easy and quick to implement and could attract significant numbers of passengers. We understand there are problems with running a frequent service into Temple Meads. We therefore suggest an interchange with the rapid transit at Clifton Down.

Buses

We strongly support the showcase bus route programme and improvements to bus services. A good bus service will attract those significant numbers who would have difficulty or do not wish to travel by car. It is important to keep those people travelling by public transport; once they switch to driving they are very difficult to attract back.

In particular we support the use of bus lanes, bus priority, bus gates and bus-only roads to protect the bus services from the effects of congestion and to reduce the capacity of the road for other vehicles. Many of these measures are cheap and quick to implement. We also strongly support better bus information, since this makes the unreliability of buses less of a problem.

Park and Ride

Friends of the Earth are uncertain of the benefits of park & ride. It is not clear that such facilities reduce car miles. Park & ride facilities attract travellers who would otherwise drive into the urban centres, but also attract public transport users who switch to driving to the Park & Ride. We urge that studies are undertaken to determine whether any benefit has been gained from existing Park & Ride facilities before adding more.

In respect of the Bath proposals, we note the conclusion of the sustainability appraisal carried out for Bath & North East Somerset Council, that:

“Park and ride has produced benefits by reducing traffic within Bath city itself, but very probably at the expense of inducing more private car traffic, and reducing the viability of alternatives to the car, from the perimeter of the city outwards. We do not know whether further expansion of park and ride would increase or decrease traffic overall, and whether its benefits would exceed the costs. We think it would be prudent to study the effects of park and ride on transport behaviour ‘outwards’ as well as ‘inwards’ from sites before committing Bath to any further expansion.”

We would therefore not support the extension of park and ride prior to such study.

Heavy rail

Friends of the Earth strongly support the heavy rail proposals, including the new platforms at Parkway and improvements to Yate and Weston-super-Mare stations. The new platforms at Parkway will significantly reduce delays and allow better interchange between trains. We would like to see more support for heavy rail, as much of the infrastructure already exists, and services can be prestigious, frequent and reliable if they are adequately resourced.

We strongly support the re-signalling of the Bristol area. We understand the capacity of the local network is largely limited by the inadequate signalling. To re-signal and substantially increase the capacity would be much more sustainable than building new roads.

We support the reopening of the Portishead railway line for frequent passenger services, possibly light rail. This line would be a better, more efficient alternative to improved bus services, and would make the additional Avon crossing unnecessary.

An unfortunate tendency has developed to regard heavy rail projects of any scale as unrealistic aspirations, with the Government Office for the South West apparently seeing it as their duty to lower expectations at every opportunity. Yet experience in Wales demonstrates that this need not be the case: a £17 million project there has just delivered a line re-opened to passenger traffic after 40 years, with two new stations and turn-back facilities. According to Robbie Burns of Network Rail, "When we started talking about this

project there was a real 'can do' attitude amongst all the key players": a sad commentary on the "can't do" attitude that prevails on this side of the Severn⁵.

Other modes

We also strongly support other suggested public transport improvements, including better integration and improved interchanges and better cycle facilities at stations.

We welcome the emphasis on cycling and walking, which could all too easily have been dismissed on the grounds that such journeys are not "strategic" in nature. These modes can contribute significantly to reducing short car journeys, enhancing public transport as the mode of first choice, and in altering the feel of urban centres and sub-centres so that they are not so readily perceived as being simply car dominated. We agree with the consultants that these are factors to be borne in mind at the outset when planning urban regeneration projects or urban extensions. However, designing cycling into the existing road system remains the top priority for creating effective on-road routes, along with the provision of secure bike parking all over the urban area. Cycle training, personalised route advice and cycle events help individuals to make the switch from car to bike and greatly reduce personal greenhouse gas emissions.

We would like to see the Local Authorities encouraged to adopt a strategic and challenging approach to walking and cycling, by expanding pedestrian areas and other ways of reducing car dominance in urban centres, and by creating dense networks of safe and attractive routes between the major population centres, schools, workplaces and other generators of travel, and public transport nodes

⁵ Welsh Assembly Government Press Release, June 10th 2005