

Secretary of State for Transport, Dept. for Transport,  
C/o Transport and Works Act Orders Unit  
Zone 1/31  
Great Minster House  
76 Marsham Street, London SW1 4DR.

Dear Sir,

Ashton Vale - Temple Meads BRT  
(TWAO application from Bristol and N. Somerset Councils,)

I wish to object to this application for a TWA order to allow construction of the Ashton Vale-Temple Meads rapid transit (guided bus) route for the reasons outlined below.

### **1. Inadequate Consultation.**

Community groups were invited by the consultants to consultation meetings but representatives reported that they felt that they were often "talking into the air" at those meetings. Questions often went unanswered and although queries were usually recorded the meeting notes failed to reflect the concerns or suggestions of groups. It was difficult to obtain information about the proposals in any detail - the maps and plans generally failed to show measurements or alignments. A number of serious concerns remain.

### **2. Meeting Transport Need.**

This BRT scheme fails to address the transport needs of the community through which it will run. Ashton Vale and Southville are poorly served by the current bus network. While many residents of Ashton Vale have no access to a car, Southville residents are trying to reduce car dependency and experience severe parking problems. The BRT would not serve the majority of either community as the stops would be located on the edge of the residential area. There may even be a negative impact on the local bus service.

Development of rail transport with a passenger service from Portishead and a new stop at Ashton Gate would serve the area just as well but more efficiently, would also serve Bower Ashton and much of Bedminster while greatly reducing commuter journeys into the area from Portishead, Portbury and Pill.

The Park and Ride service from Long Ashton already provides an adequate service along the projected route of the BRT with little difference in estimated journey times.

### **3. Environmental Impact.**

The BRT route would run parallel to Colliters Brook, cross the Avon New Cut and then run alongside this waterway to reach the City Docks. These waterways form a wildlife corridor between the open countryside at Ashton Vale and the City Centre and the corridor then continues east along the Feeder Canal and River Avon. The construction and operation of the BRT would detract from an attractive walking and cycling route as well as having serious impacts on wildlife including rare plants and animals such as otters. The area known locally as Butterfly Junction is also threatened.

### **4. Historical Artifacts.**

The BRT will require the extensive repair and reconstruction of 3 listed bridges and there is concern that insufficient funding of this part of the route will result in inadequate protection of

iconic historic structures. The Underfall Yard enjoys the highest possible level of protection as a World Heritage Site yet we fear that it could be damaged by the construction of the BRT alongside this and over the narrowest and weakest land bridge between the City Docks and the Avon New Cut. We have received no reassurance that historically important features such as stone arches, railings and surface paving will be protected.

#### **5. Sustainable Transport.**

The route of the BRT between the City and the Ashton Park and Ride is a well used cycling and walking route. It is noted that the BRT application states that the walking and cycling route will remain "wherever possible". It would be counterproductive to produce a BRT scheme which reduced opportunities for walking or cycling to work or for leisure. It was very late during the process of drawing up the proposals that it became obvious that the walking and cycling route would be along the service track of the BRT. We are not sure how this will be achieved particularly along the cantilevered section and there are concerns about safety of this solution for walkers and cyclists. At the very least the BRT will change the experience from the current peaceful and attractive route to a busy concreted means of necessity travel. I would urge you to take these comments into consideration when deciding on the merits of the proposed BRT scheme.

Tess Green  
(resident and councillor, Southville ward, Bristol)

*(Bristol South Green Party's objection follows below)*

# BRISTOL SOUTH GREEN PARTY

please reply to Peter Goodwin, 11 Lanesborough Rise, Stockwood BS14 8AJ  
(e: stockwood@bristolgreenparty.org.uk)

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Secretary of State for Transport, Department for Transport  
c/o Transport and Works Act Orders Unit  
Zone 1/31  
Great Minster House  
76 Marsham Street  
London SW1P 4DR

20th July 2010

(emailed to transportandworksact@dft.gsi.gov.uk)

Dear Sir

## **Ashton Vale - Temple Meads BRT**

(TWAO application from Bristol and N. Somerset councils, 10.6.2010)

We wish to object to the application by the the councils of Bristol and North Somerset for a TWA order to allow construction of the Ashton Vale - Temple Meads rapid transit (guided bus) route.

Our principal reasons (and we would be glad to expand on them should you wish) are:

- The scheme is an inappropriate use of a great deal of public money, in that it has very little impact on congestion relief, gross traffic levels, or journey times in the area - there are better, more effective, and quicker ways to achieve those things.
- Its main impact will be to make longer distance commuting (inward from North Somerset) more attractive, which will be both unsustainable and counterproductive.
- A secondary impact, very serious in the longer term, would be to rule out any possibility of a more fuel efficient and attractive rail based system to serve the city centre hub(s).
- A major 'justification' for this BRT link (its potential to service the development of large swathes of green belt land to the south-west of the city) should no longer be considered as a factor, since it relied on the now defunct Regional Spatial Strategy for its authority.

Below, we explain below why the Applicants have failed to provide justification for the scheme.

Taking each of the statements from the Applicants' "CONCISE STATEMENT OF THE AIMS OF THE PROPOSALS" in turn, our own (italicised) comments have been added

### **1. Extend the choice of transport modes for all, in particular car drivers, to encourage a shift to public transport**

*In this case 'all' actually means commuters coming in from North Somerset by car.*

*There is negligible new choice for anyone else. This limitation is an important factor when considering inner city congestion caused by peak hour car travel from multiple sources*

As with other successful city regions, the West of England suffers from severe traffic congestion, particularly at peak periods on main routes into the city. The Rapid Transit Scheme would expand the capacity of the public transport network to the south west of the sub-region and, by providing a new choice for travel, aims to encourage a shift away from private car use to public transport.

*Whilst a new rapid transit service would undoubtedly attract passengers from cars at the Park and Ride, and may make some (though not all) of the other conventional bus routes more attractive, the figures<sup>[note 1]</sup> suggest that there will be no real change on traffic levels in Bristol, including in most of this corridor. This failure to reduce road traffic (compared with a non-intervention policy) appears to be due to making this particular commuting route more attractive for all modes, and so increasing its use. Traffic rises to fill the road space available.*

The Rapid Transit Scheme aims to reduce journey times from Long Ashton Park and Ride to Bristol Temple Meads Station and Bristol city centre by half compared with forecasts for existing bus services.

*This is disingenuous - using 'journey time' - i.e boarding to alighting time - as the performance measure is misleading; a measure of overall times including waiting, or actual minutes saved, would give a more helpful picture, more relevant to the actual effect on the traveller and the choices he/she makes..*

## **2. To promote sustainable development by providing high quality public transport links**

The West of England is already undergoing an unprecedented level of development in terms of major regeneration schemes, in particular, the rejuvenation of Broadmead shopping centre in central Bristol (Cabot Circus) and other city centre schemes at Harbourside, Temple Quay North and Courage Brewery. Forecasts show that by 2026 the economy will support an additional 138,000 jobs and the area's population could grow by over 200,000 people. The draft South West Regional Spatial Strategy (RSS) consequently proposes large-scale housing development in the sub-region, with construction of 138,500 new dwellings.

*The RSS is no longer relevant, and local planning policies still classify the land on which these homes were to be built as 'Green Belt' . Therefore that scenario is invalid.*

A substantial increase in public transport capacity is essential if these ambitious plans for employment, commercial and housing provision within the sub-region are to be accommodated in a sustainable manner.

*This is a 'cart before horse' approach. There will come a point where growth cannot always be accommodated by modifying the infrastructure (ie exponential growth is unsustainable). Here, the Applicants take a particular level of growth as a given inevitability, and make the reckless claim that the BRT would 'soak up' the additional travel demand. The reality, as predicted by the councils' advisers, is that its share of*

*new journeys would be negligible, traffic and overall journey times will increase.*

The Rapid Transit Scheme would form part of that increase in capacity and aims to allow staff and customers to travel efficiently to employment and retail sites, improve the efficiency of supply chains, improve access to markets and thus support business competitiveness.

*Again, there's a false presumption that introduction of BRT would improve efficiency of road networks. In practice, the evidence base<sup>[note 1]</sup> says there would be as much traffic as ever.*

*Last year's report by the Bristol Partnership "Building a Positive Future for Bristol after Peak Oil" suggest that planners and business alike are using outdated thinking in their approach - for instance:*

*"An oil crunch would fundamentally threaten the way our city operates with challenges to transport, healthcare, food distribution, social cohesion, public services and other sectors"*

***"Peak oil is currently not even considered as a risk for most businesses, yet its effects would make many of today's business models redundant"***

*"Major Bristol transport planning schemes do not currently consider the potential impact of different fuel prices"....."Peak oil fundamentally alters the viability of the private car as the leading mode of transport"*

*Surely Peak Oil has to be factored in to the models for both business and commuting? Without it, all these proposals have no credibility.*

### **3. To improve access to public transport for areas that currently have poor provision.**

Up to 30% of residents in Ashton Vale do not have access to a car. The area is poorly linked to the public transport network and is without a railway station, direct bus service to the city centre or the local railway stations or Bristol Temple Meads.

*BRT makes only a marginal difference for Ashton Vale residents. It only touches one corner of the estate. It does not serve the same destinations as the current 24 bus service, which include the main local shopping centres of North Street and East Street, Bedminster. If BRT is to be a net improvement, reassurances would be needed that there would not be a corresponding loss of access to the local centres due to cuts in the existing services as they in turn lose their commercial viability..*

There is poor accessibility for car trips into Bristol from the urban settlements in North Somerset including Clevedon, Nailsea and Weston-super-Mare due to traffic congestion resulting in extended and variable journey times. Similarly bus journey times are relatively poor and unreliable.

*Predicted use of these services<sup>[note 2]</sup> on the BRT alignment remains virtually the same for the Clevedon route; whilst there are increases on the Nailsea and W-s-M routes (both of which have parallel train services), the numbers are unlikely to have much impact on corridor traffic patterns.*

The Rapid Transit Scheme would improve accessibility by both bus and car through improved journey times and journey time reliability into the city centre and improve access to job and other opportunities.

*Whilst the scheme documentation does not appear to predict actual journey times, road traffic levels are predicted to be much the same with or without BRT so it is hard to see that the claimed benefits are real. Road traffic outside the city boundary is expected to increase substantially over today's levels, so longer overall journey times are to be expected.*

Level platforms, multiple doors and low floor vehicles would be provided to help make access easier for a wider range of people, improving travel opportunities for disabled people and the mobility impaired including the elderly and parents with young children.

*These virtues are not exclusive to BRT vehicles; they could and should be provided on all modes and routes. This is not part of a case for BRT, it's the case for better access.*

#### **4. To improve integration of the public transport network**

The Rapid Transit Scheme would provide improved linkages to Bristol Temple Meads Railway Station and thus connectivity to the national rail network and easy interchange between rapid transit, rail, bus and taxis. The link with public transport hubs in the city centre, including the bus station, would allow easy interchange with bus services.

*This is grossly misleading. All the present routes already do exactly what is being claimed for BRT. In practice, though, neither the present or the proposed schemes offer anything remotely approaching seamless interchange. Transfer to/from rail services at Temple Meads involves an intermediate walk of several hundred yards and a major road crossing. Bus interchange within the city requires a knowledge of the city's geography, stops and routes, usually some walking and waiting at one of the city's many bus stops.*

*For that reason, we regard a real multimodal transport hub at Temple Meads (using the Digby Wyatt shed - a redundant part of the station - and the adjacent 'Plot 6' development site) as an infinitely better investment than any BRT project. It would provide the seamless, safe, comfortable transfer between buses, trains, and ferries that Bristol lacks at present, giving access to every part of the city and beyond. It would offer every motorist in Bristol and most commuters a real and attractive alternative to the car, and mark a real change in the quality of public transport in the city for residents and visitors alike.*

The flexible nature of bus rapid transit would allow services from the urban settlements in North Somerset remove the need for interchange at the Park and Ride thereby encouraging users to start their journey in their local town.

*This appears to have lost something in processing! We think it means that those who now drive to the Park and Ride and travel on by bus might make the whole journey by bus - rather than use the rapid transit. If so, that would be a benefit - but the consultants report suggests that take-up would be low.<sup>[note 2]</sup>*

The introduction of the Rapid Transit Scheme would therefore contribute, together with

improvements made through the other JLTP major transport investment schemes, to a high quality integrated public transport network for the sub-region.

*See above, especially in respect of the terms 'high quality integrated transport network'*

#### **5. To promote social inclusion by improving access to employment, retail, community, leisure and educational facilities**

The Rapid Transit Scheme would increase connectivity of communities in the south west of the sub-region to employment, health and leisure facilities and retail opportunities.

*The main users of this BRT line are N. Somerset commuters and shoppers, and we can - judging by the report - expect more of them to come to the city both by car and by BRT. It is hard to see how that promotes the 'social inclusion' of the more deprived areas of South Bristol, other than - possibly - generating retail jobs in the city centre. However, we note that BRT is also claimed to provide a service for Ashton Vale residents, and that they may therefore find their access to the local employment, retail, and leisure centres (North Street, East Street Bedminster) is reduced. That would make those centres, already threatened by other retail developments, less viable.*

The investment in rapid transit infrastructure is also intended to act as a catalyst for improvements in the public realm and other environmental improvements. Rather than concentrating solely on improvements to the vehicles and stops, the Rapid Transit Scheme is based on integrated design including significant improvements to the streetscape and walking environment.

*It is impossible to see how a system based on a ribbed fixed concrete 'road' can bring improvements in public realm or anything else. That said, we would agree that the section of the route between Winterstoke Road and Ashley Avenue Bridge would be well served by a cycle/pedestrian off-road path.*

#### **6. To improve safety along the corridors by reducing use of private cars**

Around 400 people are killed or seriously injured on the West of England's roads every year. Accidents involving cars accounted for around 60% of casualties (killed, seriously or slightly injured) in 2007. Public transport was significantly lower at 12%.

The Rapid Transit Scheme aims to move journeys made by private car to a safer public transport mode. Additional benefits would also be experienced by pedestrians and cyclists as a result of priority measures and improved crossing facilities and through the permissive use of the maintenance track as a car-free walking and cycling route along the rapid transit alignment.

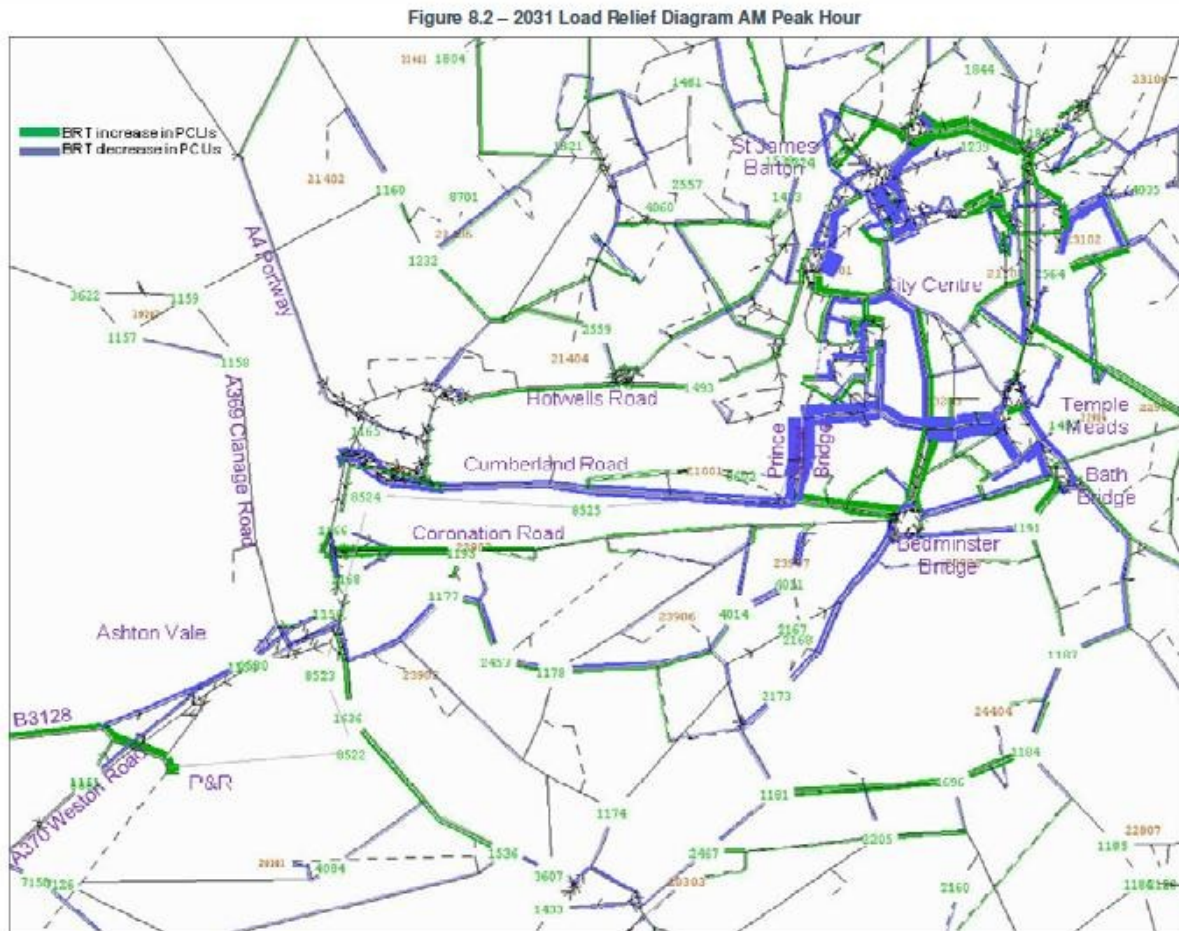
*Clearly, this ambition is to be welcomed. Trouble is that the predicted road traffic is no less with the BRT than without<sup>[note 1]</sup>, so it's hard to see how this scheme reduces accident risk.*

#### **NOTES:**

##### **1. Traffic levels.**

The application documents are very coy about predicting the schemes impacts on travel levels. We've relied particularly on :

- Transport Assessment (Atkins, May 2010) at [Environmental Statement Vol 2 - App. 16.1](#) ([http://www.westofengland.org/media/185252/appendix\\_16\\_part\\_1.pdf](http://www.westofengland.org/media/185252/appendix_16_part_1.pdf)) which offers this picture of traffic changes as a result of the scheme:



- For a clearer picture, we tried the Business Case already submitted for RFA funding - in particular, the 'Forecasting Report' which is to be found at [Appendix 3E](#) (<http://www.westofengland.org/media/105123/g-bats3%20v2.3%20forecasting%20report.pdf>). This suggests negligible differences to journey times and traffic between the 'intervention' and 'non-intervention' (ie build or don't build) scenarios.
- For good measure, we've also looked at another Atkins report, this one prepared to support the business case for the South Bristol Link ([Appendix 5, p37](#) - at [http://travelplus.org.uk/media/179449/05%20appen\\_35.pdf](http://travelplus.org.uk/media/179449/05%20appen_35.pdf)). This too suggests that there would be significant change in road traffic patterns but the overall tendency would be to increase traffic substantially. Perhaps the most potent figure is that for the very busy Ashton Way, just on the city side of the Park and Ride, where the BRT might be expected to have creamed off a maximum of car trips. It shows daily increases close to 50% without a South Bristol Link road, and a doubling with a South Bristol Link.

## Note 2: BRT/public transport journeys

Here again, there is little clear evidence published in the TWA application - apart from this in the [Atkins report](#) (at p34):

Table 5.1 – Predictions of Passenger Numbers

Service	Route	Number of Boardings (persons)					
		AM peak		Inter Peak		PM peak	
		Do Min	Do RT	Do Min	Do RT	Do Min	Do RT
903 / RT	Ashton Vale to City Centre	700	1,550	365	749	424	1,257
New / Re-routed Bus Services							
X1 Nbd	WsM to Bristol	156	199	49	77	112	200
X1 Sbd	Bristol to WsM	98	145	112	176	171	329
X7 Nbd	Clevedon to Bristol	45	43	4	6	10	12
354 Nbd	Nailsea to Bristol	120	129	16	20	28	30
354 Sbd	Bristol to Nailsea	53	65	26	41	125	153

([http://www.westofengland.org/media/185252/appendix\\_16\\_part\\_1.pdf](http://www.westofengland.org/media/185252/appendix_16_part_1.pdf))

Sadly, this gives no clue how many would be new journeys, so it's not much help. However, the comparative tables of predicted public transport use in the area (at the end of the same report) show that the BRT makes virtually no difference.

**ENDS.**