

**Our objections to the planning application:**

**The figures used in the Transport Assessment and the Travel Plan and Matchday Access strategy have been manipulated to under represent the increase in car trips to the new Stadium.**

The prediction for the increase in the number of cars (arising from a new Stadium) appears unsound as figures used for calculating it, contradict information given by BCFC fans about their mode of travel. In the BCFC Supporters Travel Survey undertaken in 2008, 57% of those surveyed indicated they were car drivers (plus 5% dropped off and 1% taxi – total 63%) and 18% passengers. When calculating the figure for extra cars generated by the new Stadium, WSP use the figures of 32% of fans will be car drivers (plus 2.75% dropped off and 0.4% taxi – total 35.1%) and 51% will be car passengers. The same lower figures have been used in the calculation of the impact of the extra cars on the local road network on matchdays and on street parking.

We would like these figures examined and the findings made public. A full critique by an independent expert of the Club's use of manipulated figures in the Travel Plan and the Transport Assessment will be included in the submission of the Ashton Vale Heritage group. Their conclusion is that:

- There are significant flaws within the Transport Assessment;
- The results of the Supporter Travel Survey were changed to reflect the transport impact of the proposed stadium in a more positive light;
- The actual number of cars on the local road network and searching for a car parking space will be 4,971;
- The on-street parking impact will be 3,921 cars;
- The more realistic trip generation figures quoted in this document would render the junctions and links surrounding the proposed stadium inoperable.

**The more realistic figures would show that a fully successfully Travel Plan which would take 1,383 (only a third of the extra cars off the road) would leave a further two thirds of the extra cars looking for parking spaces locally.**

The Travel Plan states that the transport impact of the new Stadium on the local community and the local road network will be an increase in the number of cars from 4829 (for a crowd of 15,079) to 7623 (for a crowd of 23,800) an increase of 2,769. This figure is likely to be an underestimate as it starts from lower actual current figures for both cars and fans than given in the Plan (16,270 fans average attendance and 2008 counts of over 5,000 cars on matchdays) and the figures used to calculate the car impact of the new stadium have been manipulated (see above). The Travel Plan states that the number of extra cars looking for parking spaces will be a mere 361.

**The Travel Plan is not a clear plan of action nor a serious document to address the increase in cars resulting from the development of the new Stadium nor to persuade its fans to use alternative modes of transport to get to matches.** It has no targets for increasing car sharing, cycling, walking, use of local public transport (bus or rail) by which it could be monitored in the future. There is no mention of a future budget for implementing it. It is not costed in sufficient detail to enable a judgement to be made on its likely success. Smarter Choices measures (car sharing, improved travel information, publicity) are not specified in any detail.

**The main feature of the Travel Plan is the Club's proposed bus strategy of using an additional 20 local buses to bring fans to the Stadium. It is not costed nor explained in sufficient detail to ascertain if it is financially viable in the long term.**

**The Travel Plan contains no proposals for local rail services to the Stadium site which 55% of fans indicated they would be interested in using should a nearby local station exist.**

## **The Travel Plan give no details of what measures will be implemented to get more fans arriving by local bus**

We do not know how the Travel Plan's conclusion that measures in it will reduce the increase in the number of cars by 1383 is reached as no breakdown is given. Our estimate suggests that the increase in the number of cars might be reduced by a maximum of 870 assuming all the bike parking is used and all 20 buses are full.

## **Our recommendations**

We would like the issues of the reliability of the figures and the lack of detail, costings and targets in the Travel Plan addressed by both the Club and its consultants and the City Council and in addition the following requests should be made to the Club and the West of England Partnership. We recommend:

- 1. That the Club produce as part of their Travel Plan – a clear strategy for the increased use of local bus services by fans by entering immediate discussions with First Bus, Wessex and other local bus companies including special deals for fans on matchdays.**
- 2. That the Club talk to Cycling City staff at Bristol City Council to formulate an immediate plan for promoting more cycling to matches by the installation of more bike parking for fans and staff as soon as possible without waiting for planning permission.**
- 3. That the Travel Plan should include a clear statement on the measures the Club plans to take to promote car sharing and how this interacts with their policy of charging for car parking on site and off site.**
- 4. That North Somerset Council, Bristol City Council and the West of England Partnership bring forward the two rail schemes (Portishead and the Greater Bristol Metro) that would deliver not just a station at Ashton Gate within walking distance of the Stadium but also improved services for both fans and local residents**

We would like to see the Club start to introduce some of the planned measures now at their existing stadium to show that the Travel Plan is a genuine document to reduce the Club's transport impacts on the local community not simply an exercise for the purposes of obtaining planning permission. The Club must show that it is committed to being a good neighbour by promoting genuine change in travel behaviour by its fans.

## **Our comments on the Travel Plan and Matchday Access Strategy**

There are two measures in the Club's Travel Plan and Matchday Access Strategy which could reduce the increase in car use for which figures are given.

They are (1) a fleet of 20 additional buses (4 operate already) and (2) 140 bike parking spaces.

No figures are given for the impact on car use of the other public transport related measures in the Travel Plan 1. the promotion of existing public transport services such as 903, X1 and 24/25 services (First is planning to remove the 25 service from the timetable). 2. Improving travel information provided by the BCF website.

On the most optimistic assumptions of each bus being full with 80 passengers and only 2 people currently travelling in a car, a maximum of 800 cars would be taken off the road by the use of the extra buses and 70 cars by the cycle parking spaces. A total of 870.

We cannot see how the Club arrives at the conclusion that the Travel Plan measures will reduce the increase in the number of cars by 1383. No figures are given for increased use of local rail or buses, for car sharing or how these are to be achieved. The Travel Plan mentions 350 on site parking spaces for cars with three or more passengers and 500 off site spaces (location not yet certain) It is not explained how these measures reduce car use and by how much.

Even if you accept the Club's figure for the effectiveness of the Travel Plan in reducing cars (for which a breakdown is not given) combined with their estimate of the increase in cars (which we don't) the end result is still an increase of 1,486 cars parking in the immediate area around the Stadium parking in less space than is now available as Ashton Vale and part of Long Ashton will have matchday parking restrictions. This will result in additional aggravation to local residents from more on street parking, increasing parking stress on match days particularly if the club

achieves success and grows and more traffic on roads in and around the area. Combined with a Tesco and new housing, the traffic will be even greater. This fails to live up to the claim that the Travel Plan 'minimises the impact of the development on surrounding areas'.

**Walking and Cycling** Encouraging more fans to walk to the new Stadium appears to have been dismissed because fans indicated in the Supporter Survey that less of them would walk than currently do. No strategy has been adopted to increase cycling and walking beyond the provision of 140 cycle parking spaces.

## **Buses**

We have concerns about the financial viability of the proposed bus operation.

**The cost of the bus fare** The Travel Plan states that the bus fare will be £1.50–£2. The fare is to subsidised by the income from the 350 on site car parking spaces. Assuming all the money from the parking is subsidy and that the cost of parking a car for the match is £5, then the total income would be £1,750 to subsidise 1600 bus passengers – about £1 per passenger. Assuming a £1 subsidy and income from each passenger of £1.50–£2, a bus would need to be provided at a cost of £200–£240 from each of the proposed starting points. Have the Club entered discussions with local bus companies to provide a bus and a driver for an afternoon or evening at this price?

**Bus Parking** The bus operation assumes some parking of cars at the points that the buses pick up. Finding space to accommodate up to 40 cars in a range of locations will not be easy for the Club. Locations are yet to be decided.

**Use of Park and Ride sites** All of Bristol Park and Ride sites are envisaged as picking up points for the buses. Will football supporters be allowed to park their cars there for free which will represent a loss of space and income for the P&R or will they have to pay? It is envisaged that the Ashton Park and Ride site will be used as a coach park for the 24 buses as there will be no onsite parking for coaches. If that is free, it will again represent a loss of income for the P&R. Presumably other owners of land on which fans cars will be parked will expect some payment.

## **Rail**

We would to express our extreme disappointment that the Travel Plan contains no measures for local rail services. We find it incredible that an application for a modern football stadium has no rail element. It would be both popular with the public and the fans. According to the Supporters Travel Survey, when asked if they would use a rail station nearby, 55% of fans said they would.

A solution would be for the West of England Partnership to indicate to the Department for Transport that it wishes to bring forward the proposal for the two rail projects which are already in the long term Regional Funding programme. 1) the Portishead rail line reopening which would see a reopened Ashton Gate Station which still has the platform used by football supporters in the past and new Pill and Portishead stations which could serve fans from this area (due for 2014). 2) the Greater Bristol Metro improvements on the Yate to Weston line (due 2019). Both projects will result in more frequent services which could be used by fans particularly from North Somerset.

We recommend that the West of England Partnership puts back the South Bristol Link proposal which is ahead of the two rail schemes in the Programme and brings them forward instead. The South Bristol Link is likely to meet considerable opposition from local groups including ours. The money allocated for the South Bristol Link is about the same amount as the two rail schemes together.

## **BRT**

The Travel Plan document states that the Plan is a 'stand alone proposal which can operate without the proposed BRT route running through the site'. It is envisaged that the Stadium will be completed 1–2 years before the BRT is operational. It is vital that quality public transport is in place before the Stadium is opened. BRT has a number of planning and engineering hurdles to overcome before it is constructed.

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Our other comments on this planning application and the forthcoming one for a Tesco store on the existing Stadium site are as follows:

1. There is already sufficient supermarket provision in the area. In a recession it is important to support and protect our smaller local businesses. They give us a more diverse choice of shopping, more interesting places for our community to meet and our children to visit independently and they encourage local walking and cycling.
2. The Tesco proposal is poor quality development on a prime housing site. A large Tesco store and is not a fitting tribute to the history of the club
3. The proposed sites for the Stadium and the Moorelands development are a combination of an old landfill site and the floodplain of Ashton Vale with a number of local brooks in the area. The sites are regularly flooded in periods of extreme rainfall and we fail to be convinced that an engineering solution to this can be achieved which does not add to local run off problems threatening existing local housing. We do not wish to see new housing with an inbuilt flooding problem. Hydrology reports are beyond our expertise but we would like to see a clear statement produced for the local community and local councilors on the hydrology impacts of this development.
4. The combination of a larger new Stadium and a Tesco development will increase traffic on Winterstoke Road which acts as a local through Road.
5. The construction of the new Stadium, to be built on Greenbelt land, is seen by some local residents from Bristol and North Somerset as a way of opening up the Ashton Vale Greenbelt land to the development of Ashton Park and the South Bristol Link. All TfGB groups are opposed to both proposals.
6. The Alderman Moore's allotment site, proposed for the Moorelands development, is owned by the Council and should be used to build a European style car free housing development (it is effectively land locked) which will enable a greener, immediately car free living environment for some local residents. This will enable a more efficient use of the land and facilitate the return of a small portion of the site for allotments to the Hotwells and District Allotments Association which runs the adjoining site and has a long waiting list. Car free housing developments in Europe have become popular places to live particularly for families with children and have been shown to reduce car use. As the Council own the site and are understood to be giving it free to the Stadium, we believe conditions should be attached to the planning permission to deliver housing which leads to more sustainable living by its residents. As it adjoins the proposed RT route, it is a good candidate site for the introduction of car free housing to Bristol.

Pip Sheard August 2009

On behalf of the Transport for Greater Bristol Alliance ([www.tfgb.org.uk](http://www.tfgb.org.uk))