

Transport Response to the Proposed Bristol City Stadium and Accompanying Developments

Submitted to: Bristol City Council and North Somerset Council

Planning reference 09/02242/P (Bristol City Council)

Planning reference 09/P/1061/F2 (North Somerset Council)

1 Introduction

1.1 The Ashton Vale Heritage Group (AVHG) has requested professional assistance to understand the transport implications of the development of a new stadium for Bristol City Football Club and accompanying mixed use development (hereon in referred to as 'the Application').

1.2 This document has been written by Annette Smith a transport and planning consultant with over 10 years experience working for leading transport consultancy and research organisations. I am employed by JMP Consultants Ltd as an Associate Director and have previously been employed by the Transport Research Laboratory. The views reflected in this response are held by myself and not JMP Consultants Ltd.

1.3 This document reviews the 'Transport Assessment' and 'Travel Plan and Matchday Access Strategy' highlighting significant flaws regarding the transport impacts of the Application. The key points of this document are that:

- The Supporter Travel Survey was poorly executed and therefore, the results of the survey were changed to reflect the transport impact of the proposed stadium in a more positive light.
- A gross underestimation has been made regarding the number of car trips that will be generated by the proposed stadium on a matchday. The actual number of cars on the local road network and searching for a car parking space will be 4,971 (rather than the 1,411 cars quoted in the Transport Assessment). This results in an on-street parking impact of 3,921 cars (instead of the previously quoted 361 required on-street spaces).
- This gross underestimation has also filtered through to the junction assessments resulting in incorrect traffic flows being used. The more realistic trip generation figures quoted in this document would render the junctions and links surrounding the proposed stadium inoperable.

1.4 The Applicant significantly underestimates the impact of the proposed future development. The significant flaws in the Transport Assessment and the subsequent Travel Plan (which depends on the Transport

Assessment data) should result in a refusal of this Application at this stage.

- 1.5 Therefore AVHG wishes to lodge a formal objection to this application (09/02242/P). AVHG would request permission to address the committee on their case for objecting to the planning application based on the evidence submitted.
- 1.6 In addition, there is a separate submitted document that raises significant issues regarding the planning implications of the Application.

2 Observations Regarding the Transport Assessment

Introduction

- 2.1 The Executive Summary of the AGP Transport Assessment states “The Transport Assessment examines the highway, traffic and transportation aspects of the development proposals and considers the accessibility to and from the site by sustainable modes of transport... [The Applicant] obtained information relating to travel behaviour of supporters attending the existing Ashton Gate stadium from a combination of surveys and consultation events. Analysis of the data enabled the establishment of baseline travel characteristics which helped to inform the proposals for future travel options for the AGP development”. The average attendance at the existing Ashton Gate stadium is quoted as being 15,079.
- 2.2 Significant congestion already occurs in the vicinity of the current stadium on a matchday as well as during peak periods on non-matchdays (particularly along Cumberland Basin and Winterstoke Road) and at junctions assessed as part of the Transport Assessment (particularly junctions 1 and 3). Any further traffic generation will therefore exacerbate existing congestion.
- 2.3 Interrogation of the Transport Assessment provides the following observations regarding traffic generation of the Application.

Observation 1: Poor Quality Survey Data

- 2.4 A supporter travel survey has been used to identify current and proposed traffic generation figures. 2,130 individual survey responses were received to the supporter travel survey in March 2008. A response rate of 23.5% is quoted (which equates to a total distribution of 9,160 surveys – when an average attendance is 15,079).
- The survey adopted a weak research design. Primarily the survey methodology made no attempt to apply a randomised approach to sampling from the total BCFC supporter population the results of

the survey cannot therefore be concluded as being representative of the wider BCFC supporter population. It is misleading and inappropriate for the survey results to be reported as such.

- The weak methodology and inappropriate interpretation of the survey findings are further exacerbated by the low reported response rate of 23.5%. This is low and further compromises the robustness of the survey and its findings. Furthermore, the real response rate cannot be calculated because it is not known how many surveys were distributed via the BCFC ticket office or viewed online and therefore what proportion of those surveys distributed (or accessed) via these routes were completed. In reality therefore, the real response rate could be much lower;
- The poor methodology does not enable any consideration of the confidence intervals and statistical errors associated with the reported statistics. These cannot be calculated due to the non-robust approach taken to data collection and the accuracy of any stated statistics cannot be known due to the approach taken in the data collection.

Observation 2: Non-robust Data Manipulation

- 2.5 For a weekend match, the supporter travel survey (question 5) reveals that the normal mode of travel for 57% of supporters is as 'car driver' with a further 5% being 'dropped off' and 1% arriving by 'taxi'. This equates to a total of 63% of supporters generating a car trip.
- 2.6 Despite these findings, Tables 5.3 and 9.2 of the AGP Transport Assessment states that the normal mode of travel for 32% of supporters is as 'car driver' with a further 2.7% being 'dropped off' and 0.4% arriving by 'taxi'. This equates to an unjustified manipulation of the already weak survey data to conclude a total of 35.1% of supporters generating a car trip. This reduction (from 63% to 35.1%) has been achieved by a questionable assumption that 'car passengers' were underrepresented in survey responses and a decision to apply a 1.6 multiplier to car 'as driver' to recalculate car 'as passenger' figures as well as the survey response rate (para 4.49 of Travel Plan).
- 2.7 This data manipulation of car driver and car passenger rates is unjustified for a number of reasons including:

- It is neither robust nor appropriate to recalculate the overall response rates based on apparent discrepancy between responses to the two separate questions (q5 and q6).
- There is no justification for assuming responses to q6 are 'more accurate' than those given in q5. Indeed, it could be hypothesised that respondents to the survey over-stated the response to q6 due to some respondents interpreting 'passengers' as 'occupants'. This will have inflated the stated car occupancy rates. In the absence of cognitive testing of the survey questions, not referred to in the document so presumably not incorporated within the research design, the extent to which the stated 1.6 passengers is true or not cannot be reliably concluded. Some justification is given to this manipulation based on a survey undertaken 10 years ago by BCFC however, no evidence is given of sound survey design.

2.8 There is a strong rationale for concluding that the impact of this manipulation (under-representation of car drivers and over-representation of car passengers) is unreliable and wholly misleading.

2.9 More significantly however, the figures resulting from the Applicant's manipulation of the survey results are not consistent with other evidence on travel behaviour to weekend football matches.

2.10 To provide a justifiable alternative to the mode split (and resulting trip generation figures) provided by the Transport Assessment other sources of more robust data have been identified which enables the data from the BCFC supporters survey to be compared to other sources. Comparison with other evidence strengthens the case against use of the adopted data manipulation of car driver statistics as presented by the Applicant.

2.11 The table below shows the mode split of football fans travelling to football matches in the UK and compares it with the mode split data provided by the Transport Assessment.

	Premier League National Fan Survey (06/07)	Football League National Fan Survey (2008)	BCFC Survey – Question 5 (March 2008)	BCFC – Table 9.2 in Transport Assessment (adapted figures)
Car (as driver)	48%	53%	57%	32.0%
Car (as passenger)	12%	17%	18%	51.9%
Car (dropped off)	-	-	5%	2.7%
Train	15%	9%	4%	3.0%
Bus/coach	17%	10%	5%	4.9%
Walk	6%	9%	9%	4.8%
Park and Ride	1%	1%	-	-
Minibus/van	1%	-	-	-
Taxi	-	-	1%	0.4%
Cycle				0.2%
Motorcycle				0.1%
Other		1%	-	-
Total	100%	100%	99%	100%
Respondents	26,014	37,461	2,089	N/A as adapted figures

2.12 The table above clearly shows that:

- The levels of reported car travel (as driver) to BCFC are wholly inconsistent with other national statistics. Specifically, other surveys report between 48% and 53% of Premier League and Football League fans travel to football matches by car (as driver). Although the results of Bristol City’s supporter travel survey gives comparable results to this (57%), the Transport Assessment has artificially manipulated this figure to 32%.
- The levels of reported car travel (as passenger) to BCFC are wholly inconsistent with other national statistics. Specifically, other surveys report between 12% and 17% of fans travel by car (as passenger). Although the results of Bristol City’s supporter travel survey gives comparable results to this (18%), the Transport Assessment has artificially manipulated this figure to 51.9%.

2.13 To suggest that Bristol City Football Club currently has an ‘atypical’ travel pattern to its existing stadium in comparison to other football stadia is not robust and not justified and results in a gross underestimation of trips that are currently generated by the existing stadium as well as trips generated by the new stadium. The magnitude of the implications of this data manipulation is given below.

Observation 3: Implications of the Data Manipulation

2.14 Replacement of the manipulated figures with more realistic estimates of mode split and trip rates are clearly necessary. In addition to the above critique of the data manipulation approach, consideration of alternative evidence sources indicate that the original mode split presented in the results of the supporter travel survey (question 5) may better reflect the actual level of car travel (as driver) to the BCFC stadia.

2.15 Consideration of alternative evidence sources shows:

- The original mode split figures generated by the Bristol City supporter travel survey are (in contrast with those produced following the non-robust data manipulation) consistent with the national data from the Premier League and Football League. In the absence of a robust justification of why BCFC figures would differ from those reported in this alternative national source, it is clearly more appropriate to use these figures as a benchmark;
- Parking supply: It is known that on and off-street parking for the current stadia amounts to well over 5,000 cars and therefore the quoted car trip generation rate of 4,829 cars is a proven underestimation. Off-street parking is available at Ashton Gate Stadium, Cala Trading Estate, Imperial Tobacco, Wickes, Braby's and Midas (estimated to include over 2,000 spaces). Local knowledge also suggests that unofficial parking occurs at Sainsbury's and Staples/Currys. Car parking beat surveys identified over 3,000 vehicles parked on-street in the vicinity of Ashton Gate for Saturday and evening matches. Local knowledge suggests that the parking beat survey did not cover a wide enough area. In addition, the Transport Assessment states that the parking beat surveys are believed to be an underestimate (para 5.10.4 of Transport Assessment).

2.16 Therefore, given this evidence, the table below uses the Bristol City supporter travel survey source data to provide more accurate trip generation figures at both the current and proposed stadium sites.

	Current Stadium (inaccurate, manipulated data from Table 9.2 of Transport Assessment)		Current Stadium (% from BCFC supporter survey March 2008)		Proposed Stadium without Travel Plan (% from BCFC supporter survey March 2008)	
	Supporters*	%	Supporters	%	Supporters	%
Car (passenger)	7823	51.9	2714	18	4284	18
Car (as driver)	4829	32	8595	57	13566	57
Bus/coach	743	4.9	754	5	1190	5
Walk	720	4.8	1357	9	2142	9
Car (drop off)	411	2.7	754	5	1190	5
Train (Temple Meads)	361	2.4	452	3	714	3
Train (Parson Street	86	0.6	151	1	238	1
Taxi	67	0.4	151	1	238	1
Cycle	31	0.2	0	0	0	0
Motorcycle	8	0.1	0	0	0	0
Total	15,079		15,079		23,800	

2.17 Table 9.2 of the Transport Assessment quotes that the current stadium generates 4,829 cars rising to 7,623 cars with the proposed stadium (without Travel Plan) and 6,240 cars with the proposed stadium (with the Travel Plan). The Executive Summary of the Transport Assessment suggests this equates to an increase in 1,411 vehicles searching for a parking space. Please note, the car trips generated by 'drop off' and 'taxi' are largely ignored even though (according to Table 9.2) this would equate to a further 276 car trips on the local road network and therefore a total of 1,687 cars on local roads.

2.18 However, the table above shows that the increased generation of 1,687 cars is a gross underestimation. Instead of 1,411 cars searching for a car parking space, an additional 4,971 will be on the local road network and searching for a parking space (13,566 cars minus 8,595 cars). An additional 523 cars would also be circulating the local road network as 'drop offs' and 'taxis'.

2.19 In terms of on-street local parking impact, as stated in the Executive Summary; 550 spaces will be provided at the new stadium with the 'anticipation' of 500 off-street spaces being provided close to the site.

Therefore, the on-street parking impact is 3,921 (4,971 minus 1,050) instead of the previously quoted 361 required on-street spaces.

- 2.20 In addition, the gross underestimation has also filtered through to the junction assessments (results of which show that the junctions will be put under considerable strain). These new trip generation figures would render the junctions and links surrounding the proposed stadium inoperable. All junction assessments should be rerun with more robust traffic flow data.
- 2.21 It is appreciated that the figures quoted here are 'without a Travel Plan' but it is not the purpose of this document to suggest revised Travel Plan targets.

3 Observations Regarding the Travel Plan and Matchday Access Strategy

- 3.1 The Travel Plan is based on incorrect modal split figures and therefore there is limited scope to make any meaningful observations regarding the Travel Plan. At present, the measures proposed are inadequate, the targets are flawed and monitoring of the Travel Plan would be futile when compared to the inadequate baseline.
- 3.2 It is strongly advised that the Travel Plan is revised with new target, measures and a robust monitoring strategy when more sound trip generation figures and modal splits are known.

4 The Case for Refusal of the Application

- 4.1 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.
- 4.2 This document mainly considers the matchday implications of the Application. Details of non-matchday traffic have not been reviewed in detail but should be given significant attention considering the underestimation of matchday traffic generation figures presented in the Transport Assessment.
- 4.3 The Applicant significantly underestimates the impact of the proposed future development. The significant flaws in the Transport Assessment and the subsequent Travel Plan (which depends on the Transport Assessment data) should result in a refusal of this Application at this stage.
- 4.4 Therefore AVHG wishes to lodge a formal objection to this application (09/02242/P). AVHG would request permission to address the committee on their case for objecting to the planning application based on the evidence submitted.