

Portsmouth City Centre Road Scheme planning application 17/02066/CS3

Objections from the Friends Of Old Portsmouth Association (FOOPA)

OVERVIEW

FOOPA takes a close interest in city-wide traffic matters because transport problems elsewhere in Portsmouth usually result in detrimental effects in Old Portsmouth. We support PCC's aims to encourage sustainable travel, reduce congestion and improve air quality. The proposed City Centre Road (CCR) scheme has commendable objectives and may provide some improvements but is flawed on several crucial points that may generate dis-benefits of equal or greater magnitude:

1. **Inconsistent traffic growth forecasts used.**
2. **Traffic modelling ignores congestion beyond modelled zone.**
3. **No quantitative Air Quality modelling.**
4. **Major barriers to full connectivity for active travel (cyclists and pedestrians).**
5. **Insufficient provision for priority bus travel.**

It is with regret that FOOPA objects to this planning application because it is assessed that the scheme will not achieve these aims. Further work and considerable revisions are needed.

SPECIFIC POINTS

1. Inconsistent traffic forecasts used by PCC

- High traffic growth forecasts using regional datasets used to justify building a new road: 4.1% per annum
- Low traffic growth forecasts using national data sets used for air quality prediction purposes: 0.42 per cent per annum
- **Ten times difference between these two traffic growth predictions!**
- Need for PCC to be consistent and use one traffic growth forecast for all planning and Air Quality purposes.
- **PCC needs to repeat the Air Quality Source Apportionment Study using the same traffic growth forecast as the CCR planning.**

a. City Centre Road high traffic growth estimations.

(1) The Transport Assessment has used the Solent Transport Sub-Regional Transport Model (SRTM) to estimate future traffic volumes for the proposed highway network based on future population and employment trends out to 2026 and the mode choice people will use such as active, public transport or private car. The SRTM modelling was completed in the summer of 2017.

(2) We were unable to locate in the CCR TA what traffic growth factors have been used. However, evidence given to councillors in November 2016¹ was that PCC expects (motor) traffic in the city to increase by 41 per cent over 10 years, i.e. 4.1 per cent per annum. As it was emphasised that "An active intervention is required to prevent this", concern is felt that the CCR will encourage rather than discourage motor traffic, especially as there are major shortcomings in the provision for sustainable travel. It is disappointing that there appears to have been no estimation of the growth factors for the desired increases in cycling and walking, nor modelling of the required capacity and necessary road/pavement space for active travel.

¹ PCC Head of Planning (Claire Upton-Brown) report to the TECS Scrutiny Panel on 3 November 2016 at which she forecast city traffic will increase by 41% by 2026.

b. Air Quality low traffic growth estimations. In early 2017 PCC commissioned AECOM (an air quality consultancy) to undertake a Source Apportionment Study (SAS) of road traffic sources, which was published in August 2017. AECOM used English and Welsh Regional Traffic Growth and Speed Forecasts (RTFs) and calibrated with local growth factors from TEMPRO 7.2 i.e. the SAS used national data that does not reflect regional development plans. Computation of the 2015 measured and 2020 predicted traffic flows shows that the traffic growth forecast was 2.11 per cent over 5 years, i.e. 0.42 per cent annually. It would appear to have been a major failing by PCC and AECOM not to use the same regional traffic growth forecasts that were being used concurrently by PCC and consultants WSP / Gensler.

c. Left hand, right hand inconsistencies in traffic growth forecasts. It is of concern that in the first half of 2017 PCC was using two different assumptions of traffic growth.

- (1) The low traffic growth factor of 0.42 per cent per annum has been used for air quality purposes to support the conclusion that Portsmouth does not need additional AQ measures.
- (2) The high traffic growth factor of 4.1 per cent per annum has been used for planning purposes to justify the construction of a major new road.
- (3) This inconsistency is not understood. PCC should be using one consistent growth figure for all estimations of traffic.
- (4) If PCC had used a traffic growth factor of 4.1 per cent for Air Quality predictions it is possible that the SAS would have concluded that air pollution will increase to dangerous and illegal limits and that radical measures will be needed to curb motor vehicle traffic emissions. This would call into question the environmental justification for the CCR.
- (5) If PCC had used a traffic growth forecast of 0.42 per cent per annum in the assessment of the need for a new road it is possible that the report would have concluded that there is no need for a CCR.

- **PCC is requested to explain why it has not directed its consultants to use a single consistent figure for estimated traffic growth.**

2. Traffic modelling ignores congestion beyond modelled zone

a. Limits on traffic modelling omit congestion outside scheme boundaries.

(1) The Link Flow 'gates' closest to Old Portsmouth are Queen Street, Park Road and Anglesea Road. Whilst it is accepted that all modelling needs to establish sensible limits on scope, concern exists about the effect of existing traffic patterns outside the modelled area on the traffic predictions. Residents of Southsea and Old Portsmouth are familiar with the frequent congestion at the Park Road/Anglesea Road junction and witness the long queues of traffic waiting to enter the Gunwharf Quays car park.

(2) At weekends the queue can stretch up Park Road, along Anglesea Road and as far back as Alfred Road. However, the modelling seems to assume that once southbound traffic has reached the Park Road / Anglesea Road junction it will continue unhindered to Gunwharf Quays. This is a demonstrably erroneous assumption.

- **Clarification is requested as to how the transport assessment has included consideration of Gunwharf Quays, and if the CCR modelling results predict a reduction in congestion in Anglesea Road and Park Road.**

b. CCR and Wightlink traffic modelling.

(1) It is requested that PCC explain what adjustments were made to the traffic forecasts in the SRTM to include the effects of additional developments in Portsmouth such as the expansion

of the Wightlink vehicle ferry at Gunwharf that is expected to increase the volumes of traffic passing through the city centre.

(2) It is unclear how the predictions of CCR motor vehicle traffic flows by WSP correlate to the separate modelling done by AECOM for Wightlink that was used to make the controversial conclusion that the increase in ferry traffic will not cause congestion. As the traffic growth predictions used by WSP for the CCR and by AECOM for the Air Quality Source Apportionment Study are incompatible, it is recommended that PCC check if there are any inconsistencies in planning assumptions between WSP for the CCR and AECOM for the Wightlink Gunwharf development.

(3) There is a widespread view in the local community that if PCC had influenced Wightlink to relocate to the Continental Ferry Port with easy access from the M275 then a lot of traffic congestion and air pollution problems would have been avoided.

3. No detailed AQ modelling

a. The 2016 Annual Status Report Priority 7 is:

Continuous improvement: Although the current legal limits on ambient air quality are now met across the majority of Portsmouth, the remaining NO₂ hotspots within the five AQMAs mean that exposure in these areas is still highly significant. Even where the objectives have been achieved, effort is needed to maintain air quality given pressures from Portsmouth's increasing population and demands on transport and land use.

b. The Source Apportionment Study for the 2016 Annual Status Report was carried out to quantify the contributions of different road vehicle types to ambient pollutant concentrations in the areas of likely exceedance. This involved detailed dispersion modelling of local air quality in accordance with DEFRA's Technical Guidance LAQM.TG(16)1, using the AAQURE detailed dispersion model to identify geographical areas of the city where ambient pollutant concentrations exceed or are likely to exceed the relevant NAQO.

c. It is believed that the SAS modelling approach could also be used for the CCR road network. **It is recommended that WSP conduct such a study using the AAQURE model and the same traffic growth forecast of 4.1 per cent annually.**

d. However, the Environmental Statement provides merely a **qualitative** assessment of the air pollution impacts on the city centre. The Environmental Statement fails to provide **quantitative** modelling of the air quality:

*"In particular, due to the close proximity of AQMA No.11, the Proposed Development is likely to have **some impacts on local air quality due to local increases in emissions**, however the **magnitude of this is not currently known.**"*

(1) This is a major shortcoming. The only quantitative modelling promised is an addendum to be issued for the U-Turn Scheme. The Environmental Statement explains in 4.3.3.

The Environmental Health team at PCC were contacted in October 2017 with regard to the proposed scope of assessment. Initial comments advised that consideration should be made of "not only the domain study area, but also the road network centred on AQMA No.11 and the wider network beyond". Further detail on the study area provided in Section 4.5. Consideration of a suitable base year, opening year and opening year plus five is also required. Subsequently, a revised scoping report was provided along with a figure identifying the locations of sensitive receptors to be considered in the assessment. At the time of writing, comments on these have not been received. "

(2) It is unclear whether the lack of quantitative modelling is the result of WSP deciding not to conduct this modelling, or if the PCC Environmental Health team has not provided the information needed.

(3) Whichever is the case, the precautionary principle requires that PCC commission a quantitative survey to model the changes to air quality for all pollutants along the main road axes in the scheme. This will involve some roads that are not currently in an AQMA.

- **WSP should establish the magnitude of the expected changes in air quality using the same forecast of traffic growth as was used for predicting required road capacity. PCC should publish the results of this quantitative modelling.**

4. Major barriers to full connectivity for active travel (cyclists and pedestrians)

a. **Active Travel Objectives.** The Transport Assessment makes the bold statement that:

"This road has been designed to address existing issues including congestion, lack of public transport prioritisation, poor cycling and walking opportunities."

and that it will provide:

"Cycle – shared and dedicated cycle routes to enable safe and efficient passage of cyclists through the city centre"

In many locations the permeability for walking and cycling will be improved. However, in some locations it is apparent that the needs and safety of active travel are being subordinated to the expectations of drivers.

(1) **Hope Street and Market way cycle routes.** The TA makes a comparison in Table 31 of the quality of the existing and planned cycle routes according to nine criteria.

(2) **Existing cycle route.** For Hope St/Marketway leading to Flathouse Rd/ Hope St Junction to Unicorn Rd/Alfred Rd Junction the report assesses that both existing and planned cycle routes score 1 (the best). This is surely wrong. The existing unsegregated shared use cycle path on the pavement is only 1.5m wide on the narrowest stretch and is perceived to be one of the most dangerous cycle routes in the region. Doubt is expressed that whoever made this assessment has actually cycled the route in rush hour.



Hope Street west side narrow (1.5m) shared use pedestrian and cycle path under half DfT minimum recommended width - yet assessed as highest level of cycle and pedestrian safety by WSP

(3) **Shortcomings of Planned cycle route.** The planned 3m wide cycle path on the eastern side of Hope Street is reduced to a narrow pinch point. From plans it appears to be only 1.8 metres wide by the rear wall of the Sainsbury's delivery yard. This is narrower than the minimum width

recommended by the DfT and the Highways Agency and is worryingly inadequate to cope with the desired increased levels of two-way cycling that PCC desires. Retaining a dangerous pinch point will have the undesirable effects of:

- Encouraging some cyclists to continue to use the main carriageway, which will delay motor traffic and regrettably increase animosity of some drivers towards cyclists.
- Deterring less confident and potential cyclists from cycling, which will hinder public health efforts to encourage more active travel as a key measure in reducing obesity.

(4) It is essential that all new cycle paths are at least 3m wide, and wider still if they are adjacent to high walls, don't have physical separation from the main carriageways or are to be shared use with pedestrians.

(5) The only reasonable, prudent, safe and ethical course of action will be to purchase more land to achieve the widths of cycle paths that adhere to best practice in DfT Local Transport Notes for dedicated cycle paths and Unsegregated and Segregated Shared Use Off-Carriageway Routes (OCRs).

b. Prevention of cyclist fatalities.

(1) It should be borne in mind that the Coroner's report on the tragic death of a cyclist in 2017 on the Eastern Road cycle path (which had been designated by PCC as a recommended quiet route) concluded:

"The corner of the shared cycle / pedestrian pavement where the cyclists collided is a narrow pinch point with poor visibility and no safety barrier. I am of the opinion that the highway authority should give consideration to improving cyclists and pedestrian safety at this corner".

(2) PCC has been served a prevention of future deaths report (PFD)

https://www.judiciary.gov.uk/wp-content/uploads/2017/12/Timothy-Atkins-2017-0265_Redacted.pdf

It is of major concern that PCC is planning to construct a narrow and dangerous pinch point on the cycle path on Hope Street that is allegedly intended to improve travel for cyclists by providing routes that are accessible, convenient and safe; yet knowingly fails to meet minimum Design Standards. In the event of another serious RTA involving a cyclist, **PCC as Highway Authority will be exposed to the risk of being prosecuted for corporate negligence or even corporate manslaughter for having failed to provide adequate infrastructure** despite having had a recent example of the fatal consequences of such neglect.

5. Insufficient provision for priority bus travel.

a. Transport Assessment recognition of importance of bus travel.

(1) The TA explains that:

"The current network does not prioritise bus routes and therefore does not encourage the use of public transport".

(2) It also explains that bus travel has major potential to improve transport:

"forecast to increase in frequency (is) the Park and Ride service Park and Ride currently operates every 10 minutes at the busiest times, but could operate as frequently as every 6 minutes at the busiest times as Portsmouth City Centre grows, and if it remains the sole P+R for Portsmouth."

(3) This is supported by the 2016 Annual Status Report Priority 3:

The continued introduction of bus priority measures and introduction of improved bus exhaust technology therefore play an important part in ensuring public transport can offer a realistic and sustainable alternative to the private car.

b. **Bus lanes.** Public transport will be hindered in providing a realistic and sustainable alternative to the private car if PCC fails to provide enough bus lanes which could contribute to strategic failure of this transport plan.

c. **Restore Mile End Road bus lane.** The opportunity should be taken to restore the missing section of bus lane on the southbound carriageway of Mile End Road on the approach to Church Street RAB and ensure a continuous priority bus lane from the P+R into the city centre. This will restore adequate connectivity with the Park and Ride at Tipner.

CONCLUSIONS

5. **Moving the problem but not solving it.** Concern is felt that the net effect of the CCR will be simply to shift the location of the congestion and air pollution from the M275 and Mile End Road into the heart of the city centre with detrimental effects on movement in the city centre and worsening of air pollution. If congestion in the city centre increases, the fall-back will be to 'gate' traffic at the southern end of Mile End Road which will negate the expected advantages of the scheme.

6. **Lack of incentive for modal shift to active travel.** It is generally accepted that most drivers wish to continue driving and are reluctant to make their own modal shift to sustainable transport modes, preferring to wait for other drivers to make the change.

a. As the aim of the CCR is to make it easier for people to drive into the city centre, it is considered optimistic to assume that a significant number of drivers will choose to walk, cycle or take the bus instead of retaining the convenience of the private car.

b. The CCR planning shortcomings in several aspects of infrastructure for active travel and bus travel mean that deterrents to sustainable travel will continue.

c. The disappointing but realistic expectation is that the outcome of the CCR development will be to encourage more people to drive (often in Single Occupancy Vehicles) and will do little to encourage people to be healthier through active travel.

RECOMMENDATIONS

1. Repeat the city-wide Air Quality Source Apportionment Study using the same high traffic growth forecast of 4.1 per cent per annum to be consistent with the CCR traffic modelling.

2. Use the AAQuIRE model to identify geographical areas of the CCR scheme where ambient pollutant concentrations are likely to exceed the relevant NAQO, and quantify the contributions of different road vehicle types to ambient pollutant concentrations in the areas of likely exceedance.

3. Conduct a review to identify any inconsistencies between AECOM traffic modelling for Wightlink Gunwharf ferry terminal and WSP traffic modelling for CCR.

4. Review all locations where the planned cycle and pedestrian routes do not meet recommended DfT Standards and identify costed options to achieve good, safe, accessible and continuous active travel.

5. Review gaps in bus lanes with the intention of providing continuous bus lanes to promote fast and reliable public transport that will have priority over private vehicles.

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12 January 2018