

From: carl@tonks-consulting.co.uk
To: [Osborne, Helen/BRS](#)
Cc: [REDACTED]
Subject: Re: Response to cTc-2018-F-008 Ashton Gate MetroWest Letter R Guyatt 26022021
Date: 03 March 2021 18:22:31
Attachments: [c28b72bf.png](#)
[92e13839.png](#)
[cTc-2018-F-008 MetroWest Jacobs Letter 03032021.pdf](#)

Dear Ms Osborne,

Please find attached my reply to your email message of yesterday.

Kind regards,

Carl

Carl J Tonks BSc MSc FCILT MCIHT FIHE

MANAGING DIRECTOR cTc Group
DIRECTOR carl **TONKS** consulting
DIRECTOR cTc Europe

Transport Planning, Traffic Engineering and Highway Consultancy

cTc is a strategic alliance between carl **TONKS** consulting, cTc Transport Planning and cTc Europe.

carl **TONKS** consulting and cTc Europe are trading names of Carl Tonks Limited (UK 8048957)

News:

Despite the influence of the ongoing pandemic, cTc is continuing to grow and develop our brand with a new presence in Paris. This will provide support for our UK staff, whilst maintaining a foot in the door with the EU following the UK's recent departure.



Wishing all of our clients, colleagues and fellow professionals the best of health and fortune in these unusual times. Stay safe!

CTC 13 – 14 Orchard Street
Bristol
BS1 5EH
Also in Newport and Paris.

T- 0044 (0)1179 055 155

M - [REDACTED]

e- carl@tonks-consulting.co.uk

w- www.tonks-consulting.co.uk

This email is intended for the named addressee. It is confidential and may contain legally privileged information. If you are not the named recipient and have received this message in error, please destroy the message and contact the sender. Although all emails to and from this account are scanned using Norton virus protection, cTc takes no responsibility for issues which may arise in transmission and you remain responsible for your own virus and malware protection for all internet traffic, including the contents of this message and any attachments thereto.

On 2021-03-02 17:03, Osborne, Helen/BRS wrote:

Dear Mr Tonks,

Thank you for the prompt clarification and reply to Richard Guyatt's correspondence of 24th February 2021. To expedite a response prior to the Issue Specific Hearing on Thursday 4th March, Mr Guyatt has asked us to respond directly to you on behalf of the Applicant, in relation to specific points regarding ETM traffic movements.

Please note that last week's correspondence was to seek clarification on a particular point. Absence of specific comment does not mean acceptance by the Applicant of all other information provided or that it is accurate.

Mr Guyatt's recent communication to you was aimed at understanding your response to the question relating to ETM traffic movements (ExQA TT 2.4 part xlv), in order to clarify matters prior to the Issue Specific Hearings. This was because your response [in REP5-044] could not be reconciled with any other information about traffic movements or ETM's overall site usage, and in effect also does not provide the information about ETM traffic movements requested by the Examining Authority.

In your letter dated 26th February 2021, you note that the error you made in your first submission [REP5-044] is one of "terminology", and that this has "no effect on the conclusions", that your analysis of ETM weighbridge data demonstrates a "considerable increase in vehicle movements in and out of Ashton Vale Industrial Estate". You go on to note that [in REP5-044] where you had indicated: "Typically, on a weekday, ETM sees of the order of 3,500 lorry loads deposited at the site..." (and so on for other movements), that this was not actually movements per day, but movements per month as a total for all of the weekdays in the month. There were 23 weekdays in May 2017, of which two were Bank Holiday Mondays, so the figures quoted were at least 21 times larger than those indicated in the original submission [REP5-044] as being typical for a weekday. This flowed through to all data provided for ETM movements [in REP5-044].

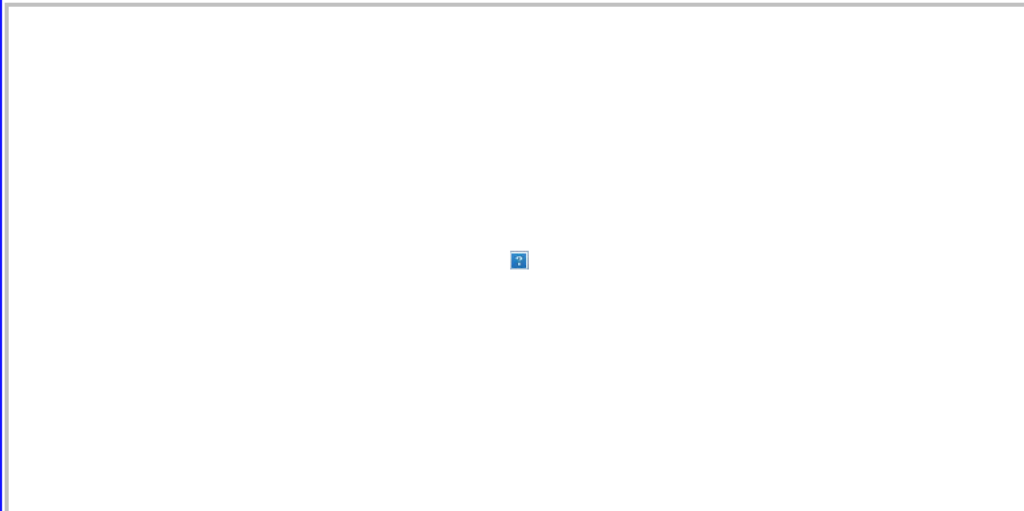
However, your most recent response still does not appear to deal with the Examining Authority's request for similar information to be provided for ETM movements as had been provided for Mannheim Auctions in Table 4.1 in your Deadline 4 Submission [REP4-050], which contains typical daily totals for traffic movements associated with

Manheim Auctions. The remainder of your discussion of ETM traffic movements focuses entirely on changes over time, going on to criticise at length some indicative payload to vehicle conversion information that was (as you surmised and commented) only provided for illustrative purposes.

Such illustrative payloads were employed in an attempt to understand the typical weekday movements figures you provided, which could not be reconciled with any other information about traffic movements or ETM's overall site usage. It is perhaps worth noting at this point that this type of analysis has never been utilised in any assessment or modelling of the Ashton Vale Road junction.

Returning to the matter of ETM traffic movements, you note that "the key conclusions in my previous correspondence referred not to the absolute numbers of vehicles, but to the proportional increases" and that the latest submission confirms your conclusions. However, such a conclusion represents a narrow focus that has the potential to obscure the significance of the absolute numbers. The absolute number of vehicles is important, as this context is key to the significance that should be given to the initial situation and any increases. Simply put, a large increase of a small number will still result in a relatively small number, which will affect its significance.

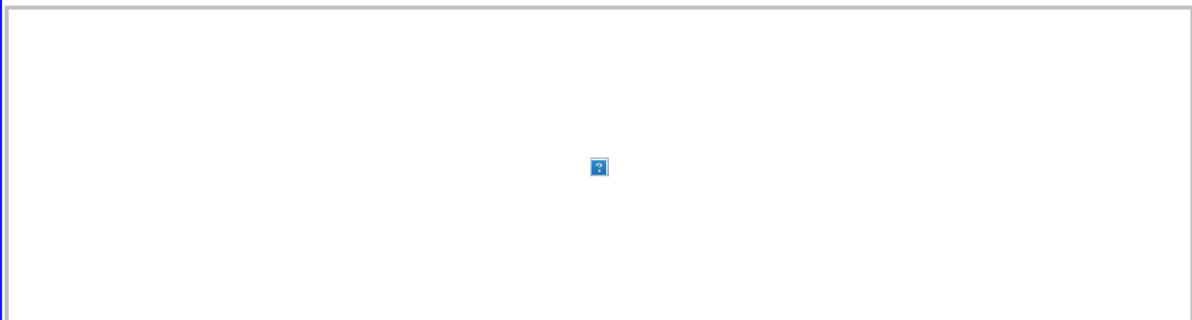
As such, below is a table of estimated ETM traffic movements. This takes the figures you provided for monthly total ETM movements [in REP5-044], and applies some basic assumptions to estimate typical average weekday per day totals, as well as hourly movements based on an average hour across the day and specific estimates for the AM and PM peak hours, in turn based on assumptions noted in your submission [REP5-044] about operating hours. As we are sure you appreciate, it is not the total amount of movement across a month or day that is material to traffic assessments across congested networks, but the way that traffic movements relate to periods of high demand in the local network. As this table is largely based on information you have supplied, please can you confirm you accept it is a reasonable estimate of the situation, in the absence of any more specific or detailed information being provided.



It is clear from this table that, while there has been an apparent increase in movements associated with ETM from May 2017 to the "current operation", the absolute numbers involved on a daily and hourly basis are very small, with only an around 14 additional vehicle movements (two-way) in an average hour when comparing the "current operation" with May 2017. Also, as you note in your previous submission [REP5-044], hardly any movements occur in the PM peak hour (which is considered the key time period for congestion on the local highway network).

As such, the Applicant does not consider these figures significant to the operation of Ashton Vale Road and its junction with Winterstoke Road.

The table below illustrates the context of absolute values through comparison with traffic count information for Ashton Vale Road, across similar time periods with estimated movements to/from ETM (taking estimated ETM movements from the table above).



This table indicates that, in May 2017, around 18% of all vehicles entering/leaving Ashton Vale Road industrial estate were HGVs, and some 42% of all HGVs were associated with the estimated ETM traffic movements. Only approximately 8% of all traffic using Ashton Vale Road is related to ETM, and any increase in ETM movements has to be considered in this context. The increase in ETM movement postulated by your figures would imply a change in HGV traffic using Ashton Vale Road from 58 to 72 HGVs per average hour (two-way). This is not a significant change in absolute numbers of HGVs, let alone in relation to total traffic flow.

Hence, while your analysis of ETM weighbridge data demonstrates a potential rise in movements associated with ETM's own operations, it does not identify a "considerable increase in vehicle movements in and out of Ashton Vale Industrial Estate".

Regards,

Helen Osborne

Helen Osborne
Jacobs
Associate Director | Transport Planning
Helen.Osborne@jacobs.com

NOTICE - This communication may contain confidential and privileged information that is for the sole use of the intended recipient. Any viewing, copying or distribution of, or reliance on this message by unintended recipients is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Our Ref. 2018-F-008
Date: 3rd March 2021

T – +44 (0)1179 055 155
M – [REDACTED]
e – carl@tonks-consulting.co.uk
www.tonks-consulting.co.uk

Ms H Osborne
Jacobs
1 The Square
Temple Quay
Bristol
BS1 6DG

cTc Group;
Bristol
Newport
Paris

By Email *helen.osborne@jacobs.com*

Dear Ms Osborne,

RESPONSE TO H OSBORNE EMAIL OF 2ND MARCH 2021

Thank you for your email of yesterday, to which I respond below. To be clear, I am delighted that Jacobs and your client team has chosen to engage with us in regard to my clients' substantial concerns as to the likely traffic impact of your client's scheme on access to the Ashton Vale Industrial Estate. As you are aware, this is a matter of great concern to my clients and one on which we have sought discussions with your team for some three years or so.

I must note, however, that these discussions could have been considerably more helpful to the process by way of assisting to reach a realistic, acceptable and hence agreeable assessment of how my client's junction operates and will be impacted by your client's proposals, had they taken place in advance of the DCO process, rather than at the end of it.

It is unfortunate therefore that my requests to engage have been rebutted over the three years I have been involved in this project. However, we are where we are and I will continue to assist the Inspectors to understand the significance of the numbers presented, as required.

Continued.../

cTc Group comprises;
carl **TONKS** consulting, cTc Transport Planning and cTc Europe

Company Director – Carl J Tonks
BSc MSc FCILT MCIHT FIHE
Company Secretary – Jacqueline A Ireland
BSc (HONS) MSc PGCE BHSII MCIHT

carl **TONKS** consulting and cTc Europe
are trading names of Carl Tonks Limited
UK Company Number 8048957
Reg' 13 – 14 Orchard Street, Bristol, BS1 5EH

Whilst I welcome the opportunity to discuss the detail of the numbers submitted, unfortunately your email appears to wholly miss the relevance of my observations in my previous submission. You have taken the numbers which I have provided and applied your own broad assumptions to result in traffic flows which appear to be little more than guesswork, in regard to important matters which should have been properly surveyed in order to compile your traffic models. This approach, which equates to what may be colloquially termed “*fag-packet maths*”, is wholly unacceptable in view of the considerable potential for harm to an acknowledged key employment location. Unfortunately, this reflects the approach throughout this process, which, despite my identification of important issues with the survey data some three years ago, has simply sought to prop up the previous assessments, rather than collecting new survey data to reconstruct the modelled matrices in a robust form. However, and as I say above, we are where we are and so to address the points in your email of yesterday, please see my responses below.

You correctly identify that the ETM traffic was not quoted in a tabular form in my letter of 16th February, as had been requested by the Inspectors and I draw your attention to the first Paragraph at the top of Page 3 of my previous letter, which stated this and explained why I had presented the data differently. To recap, that Paragraph stated;

“xliv) ETM Traffic Demand

Although the request from the Inspectors requested “...a similar table...” to that previously submitted for Mannheim, the volumes of vehicle movements associated with ETM are sufficiently large and variable as to require consideration in context to ETM’s activities over recent years. I have therefore provided the information below, however, rather than in a table of figures, I provide the context to each value quoted. My intention is to present the values in as clear and unambiguous a format as possible and I trust that this is acceptable to the Inspectors.”

I then went on to present data from my client’s weighbridge records and have acknowledged my poor description of that data, which has led to confusion and which I have previously addressed. Given the variability of the trips to the ETM site I continue to believe that it is important to view these figures in context, not simply as a table of figures as was appropriate for Mannheim, however and in order to move this discussion forward I have further analysed the weighbridge data and present the breakdown requested for current operation of the site, in Table 1, below. I stress that this should be viewed with caution as the daily flow and profile varies considerably due to the nature of my client’s business.

Table 1; Traffic profiles associated with ETM HGVs

Date	Weekday daily total trips (in + out)	Weekday AM peak hour total trips	Weekday PM peak hour total trips
May 2017	244	30	8
October 2020	380	38	4

Continued.../

The above values are taken directly from the ETM weighbridge records, however, I refer back to my comment above, that daily variation in these is substantial. To illustrate the variation, I attach graphs by day for October 2020.

In Table 2, below I compare the above figures for October 2020 with your assessment, presented in your email of yesterday.

Table 2; Comparison of cTc and Jacobs values (2020)

	Weekday daily total trips (in + out)			Weekday AM peak hour total trips			Weekday PM peak hour total trips		
	Min	Ave	Max	Min	Ave	Max	Min	Ave	Max
cTc	314	380	408	26	38	52	0	4	8
Jacobs	390			38			5		

In addition and not included in the above are employees. ETM currently employs some 52 staff on-site, excluding drivers. The majority of these arrive by car and are in addition to the commercial vehicles logged at the weighbridge.

The above comparison indicates that your assumptions have led to reasonable approximation of the average weekday use of the ETM site by HGV's, however, you will recall my reluctance to present this data in simple tabular form, due to the significant variability of demand from day to day. The above summary indicates a very sizeable swing in attendances, in which peak hour demand on some days is double the equivalent demand on other days, hence using a mean demand in any analyses is wholly insufficient to ensure the business remains unharmed due to traffic impact of the Metro proposals. Designing for the mean traffic generation could result in the junction providing inadequate capacity to cater for my client's busier days. This is illustrated clearly on the enclosed graphs.

However, the key issue is not how much have ETM grown, but how much may other businesses in the estate have grown, or seek to grow.

The critical point of my clients' submissions is this; in addition to being based on surveys undertaken at a time of substantial road works within the junction in question, your model OD matrices are not subject to any traffic growth on Ashton Vale Road, hence you assume no change in traffic demand associated with the businesses with the estate from 2017 to current and onwards into the future.

Although my submission focussed on changes in traffic associated with ETM, my key concern is that businesses within the industrial estate should be expected to grow and develop in response to customer and client demand. No allowance has been made for this in your models. This is clearly inappropriate for a location of designated importance to Bristol's employment market.

Continued.../

The ETM growth has been significant and has been achieved through a mixture of organic growth and implementing business changes through the Planning system. Whilst I accept that the latter is difficult to predict and there is an argument that future planning applications should refer to the DCO, if indeed it goes ahead, rather than vice-versa, it is essential that the impact of the scheme sought through this DCO is fully and robustly analysed in light of organic growth of businesses within this site of acknowledged employment importance. This reflects the Agent of Change principle as discussed in some detail by Mr Burton. This is a highly valued active employment area and your client is required to demonstrate that their proposals will not impact on current business operation, or future realistic opportunities.

The data I have presented from ETM is indicative of this for one of the employers within the site and suggests organic growth of 9%pa was achieved prior to their substantial additional investment in the site. I do not have the same data for other occupiers, however, I draw your attention to the letters I have submitted from other employers of the Industrial Estate, eschewing the same concerns as ETM. Their business development and organic growth is potentially impacted by the Metro proposals and no allowance has been made for this.

Regarding the modelling undertaken, you will recall that in order to provide a second opinion concerning the validity of your model I commissioned an independent review from traffic modelling specialists SYSTRA. The review received from SYSTRA confirmed my early concerns and added further serious issues in regard to your VISSIM model. Despite this, no attempt has been made to address the concerns raised, and instead your team has simply sought to retrospectively justify the matrices as compiled.

Summary

The DCO submission should be up to date and relevant at the time of its reliance by the Inspectors. My previous submission confirmed that the model was neither up to date, nor relevant. Your assertion that the ETM increases on their own are insufficient to be considered significant misses my point that any, or all employers should have the opportunity to develop their business and you have made no allowance for this in your model.

For the avoidance of doubt, in regard to the adequacy of the model, my position and that of my clients remains that;

- Your traffic model was compiled using data collected at an unrepresentative time due to substantial roadworks;

Continued.../

- Your claims that the road works did not alter the traffic usage of the junction, as judged by your enumerators can be afforded no weight as no information is provided to justify this. Furthermore, the results of your model are not recognised by the employers within the Ashton Vale Industrial Estate as being representative of the junction operation as they see it day-to-day;
- The traffic surveys upon which you rely to validate the model also took place at times of significant road works on Winterstoke Road, hence do not reflect normal highway operation;
- Whilst I acknowledge the presentation of a Linsig model alongside the VISSIM, this also relies on traffic data collected at the same time as for the VISSIM model and subject to the same unusual influence of road works.

In considering the above I draw your attention to the submission of my colleague, Mr Burton, on Planning Matters. He identifies the importance of this site to the employment market of Bristol, as espoused in the Bristol City Local Plan. In policy terms, this site requires to be protected and a precautionary approach needs to be taken to anything with potential to adversely impact on the efficiency of the site to serve Bristol's employment needs. Whilst a mass transit system into Bristol City Centre has been needed for many years, the scheme as presented has a significant likelihood of materially harming the accessibility of the Ashton Vale Industrial Estate and therefore the above precautionary approach must be taken.

It is essential that the analyses on which the Applicant relies are robust and clearly confirm that any undue impact will be satisfactorily mitigated. The approach taken to constructing and presenting the traffic models relies on inappropriate data and is therefore anything but robust. It is our position that the Applicant's initial proposal to provide a wholly new access to the industrial estate was reflective of the required precautionary approach. There was the potential for significant traffic impact by increasing the closure of the sole access to an important employment site, hence the logical and precautionary approach was to provide alternative access. This made sense and would have been entirely acceptable in principle to my clients.

Having dropped this original proposal, the precautionary approach would have required collection of representative data to construct a model which adequately validates against similarly representative data. This model would then be used to forecast future issues and to measure opportunities for mitigation. The approach followed by the Applicant's team does not reflect the precautionary principle and is therefore contrary to policy in regard to this important site.

Continued.../

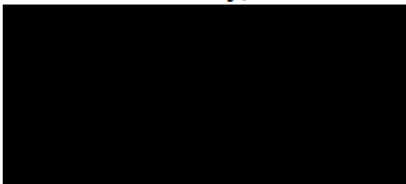
The concerns of numerous employers within the estate have been voiced in letters submitted over a three-year period, culminating in the DCO Hearing and confirm that the fundamental issues identified in the traffic model result in a submission in which the occupiers of Ashton Vale Industrial Estate have no confidence. My technical review, assisted by SYSTRA on matters of model detail, has confirmed that this lack of confidence is well founded.

Our concern and that of our clients is not specifically in regard to the impact of any individual company's expansion, but of the cumulative impacts of organic expansion of businesses across the estate. Whilst your demonstration yesterday concluded that the ETM growth was not significant of itself, our concern is that all businesses will be naturally seeking organic growth and within an important business location they are entitled to do so. Although we are not appointed to represent all of the businesses within the estate, it is to be expected that cumulative growth of all companies could result in a significant increase in traffic using the existing access.

On busy days there is already concern in regard to the operation of the junction and significantly increasing the closure time of the level crossing can only reduce traffic capacity and increase queue lengths. I accept that implementing MOVA will assist, but your other improvements comprise adding further queue storage. This of itself is an acknowledgement that queues are inevitably expected to grow and must be safely accommodated. The concern of my clients is that whilst in your view the growth of any individual company is unlikely to cause significant impact on the operation of the junction, your client's proposals represent the Agent of Change and thereby you must robustly demonstrate how your impact will be mitigated in order to retain the ability of my clients' businesses to grow, in the face of cumulative expansion of others within this key employment location. The model as it currently stands fails to achieve this demonstration.

Although this opportunity to engage is welcomed, I question what can be achieved from it in light of the above confirmation of our lack of confidence in your model. Unless and until your model matrices are recompiled on the basis of new and more relevant information, I am unclear as to how you propose to move matters forward.

Yours sincerely,



Carl J Tonks BSc MSc FCILT MCIHT FIHE

MANAGING DIRECTOR

DIRECTOR

Enclosure

cc

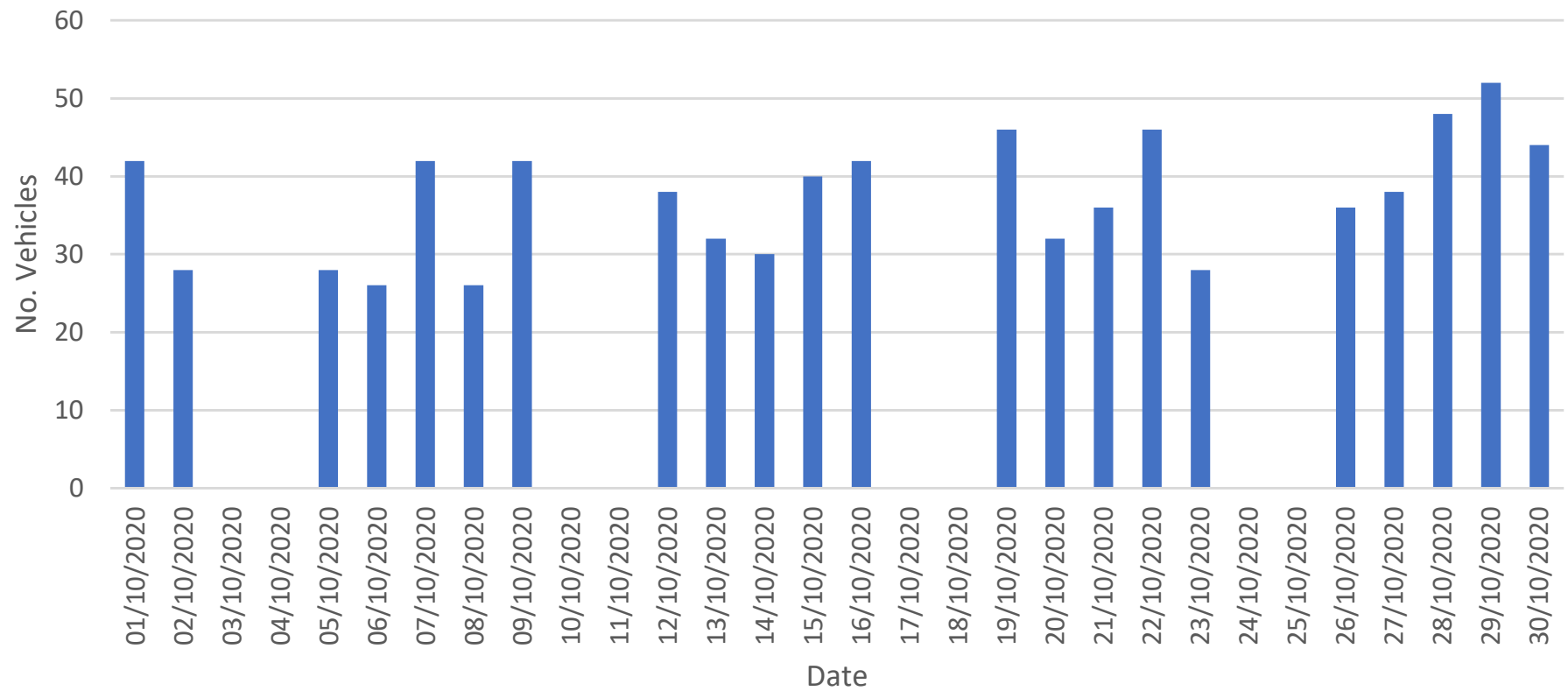
cTc Group

carl TONKS consulting

ETM AM Peak weighbridge data; ETM PM Peak weighbridge data

PINS, WBD, Manheim, ETM, SPLS

AM Peak Hour ETM Vehicles Per Day



PM Peak Hour ETM Vehicles Per Day

