

Department of Place

Planning, Transportation & Highways

Highway Services
4th Floor Britannia House
Bradford
BD1 1HX

W www.bradford.gov.uk
Tel: (01274) 437635
Email: james.williams@bradford.gov.uk

Date: 24th May 2021

Dear Kath Jackson

I refer to your email dated 17th November 2020 regarding Bradford Shipley Route Improvement Scheme including the attached report on the “Bradford Shipley Road Scheme” approved by Shipley Constituency Labour Party. Please see feedback in relation to your email below.

Dear James

I am attaching the report recently approved by an all-members meeting of the Shipley Constituency Labour Party, regarding the Bradford Shipley Road Scheme, which is also publicised at <https://www.shipleylabour.org.uk/blog/2020/11/09/bradford-shipley-road-scheme/>.

Before anything else, thank you for your time in meeting Councillor Jenkins and Ludi Simpson while the working group were drawing up the report, and pointing us to some of the official documents, which was very helpful.

The report and its appendices express several concerns about the road scheme proposals, as won't surprise you from our previous correspondence and questions. We feel further public consultation without information that could show how the benefits of the scheme can be guaranteed, and satisfy our concerns, is not worthwhile.

It would be extremely valuable to meet with you – and with Sally Jones who Ludi Simpson also talked to regarding the Clean Air Zone which you felt to be closely linked to the road scheme's objectives – to discuss with you the nature of the evidence which would allow Shipley Labour Party's concerns to be fully assessed. The working group continues as requested by our members, and I wonder whether we could set up such a meeting soon?

Yours sincerely

Kath Jackson

For the Shipley CLP Bradford Shipley Road Scheme Working Group

The Council's response is set out below:

May I firstly take this opportunity to apologise for the delay in this reply. As you will know the Bradford Shipley Route Improvement Scheme is still within its early stages of development and as such there are areas of the scheme design which are fluid and are being revisited by the project team currently based on feedback from recent consultation events and budgetary considerations.

Please find below responses to concerns raised in your attached report:

Ref. 1 While the scheme has positive aspects in greening the Manningham Lane route, and aims to decongest the Canal Road/Valley Road route, the information about the scheme does not address the danger of increased rather than decreased congestion, increased pollution including to school children affecting the rest of their lives, breaking the commitment to improved air quality, and is not part of a wider response to the climate emergency.

The scheme is still under development and working towards the objectives of the West Yorkshire Plus Transport Fund. Your comments and others from recent consultation events have been collected and will be considered by the project team as part of the schemes development.

The principles of this scheme have been developed with Bradford's Clean Air Plan that aims to clean air including nitrogen dioxide and particulates throughout the Bradford district.

The Bradford Shipley Route Improvement Scheme falls within the defined Clean Air Zone (CAZ) and as such the impact on improving air quality will be monitored through the enhanced air quality benefits realisation plan associated with the Clean Air Plan

The Clean Air Plan will be monitored through a dedicated team of officers from the council, central government as well as Born in Bradford specifically looking at health benefits associated with the plan and working with schools such as Shipley C.E Primary School.

Ref 2. There has been no public release of evidence about future traffic, air quality or noise under the scheme, and there appears to be no plan to release such evidence as part of consultation for the scheme.

The scheme is still under development. Evidence will be summarised and presented at future consultations and other statutory procedures such as applying for Planning approval.

Ref 3. Concern 1: The insufficient reference to the Climate Emergency which threatens all our lives and livelihoods.

- **The scheme is not subject to recent Climate Emergency policies adopted by WYCA and Bradford Council.**
- **Lockdown in 2020 has shown that reduced traffic ends congestion, improves air quality and renews wildlife.**
- **The scheme is in a proposed Clean Air Zone, but has no target to reduce emissions of harmful gas and particle - apart from there being a general recognition that flowing traffic on Canal Road would be less polluting in that local environment, than stationary traffic.**

Bradford Council and the Combined Authority declared a climate emergency in 2019, after the development of this scheme had started.

We are keen to understand the contribution to carbon and hence climate emergency response and this will be assessed as part of the Full Business Case (FBC) on the preferred option.

Following lockdown in March 2020 as a result of Covid-19, the council implemented long term traffic monitoring that monitor traffic volumes and associated air quality impacts as part of the Clean Air Plan development.

The proposed Clean Air Zone is being introduced to achieve compliance with EU limit thresholds of 40µg/m³ NO₂. Detailed air quality modelling of the Canal Road corridor and wider Clean Air Zone demonstrate that it will achieve figures better than this threshold in 2022. These threshold levels are similarly not exceeded through to 2027 even when the principles of the Bradford Shipley Route Improvement Scheme have been implemented.

Ref 4. Concern 2. The danger that a wider Canal Road/Valley Road will fill with new traffic, not improving congestion there and at the same time worsening congestion through Shipley.

- **Government research expects a fifth of increased capacity to be filled by newly-attracted 'induced' traffic, and more than a fifth on congested urban roads.**
- **Any increase in traffic will worsen the existing bottleneck from the Branch to Saltaire junction on the A650, with an impact on all other Shipley Roads.**

As part of our assessment of potential induced demand we use variable demand approach in our modelling. This is a nationally accepted methodology and not unique to Bradford. Conversely, as this scheme will reside within the Clean Air Zone, the implications of a charging scheme on vehicles using this corridor has also been considered as this will have an impact of reducing the variation caused by induced traffic.

The traffic model used to assess the impact of the scheme uses a comprehensive network of roads in the local area and wider district. Where issues are identified through this model that need further investigation, further detailed models may be used that will look at traffic signal operation and how these can be maximised to avoid congestion.

The traffic modelling outputs will be summarised and presented at future consultations and other statutory procedures such as applying for Planning approval.

Ref 5. Concern 3. The aim to increase traffic past Shipley CofE school, without adequate reduction in the already excessive level of pollution.

- **Traffic is the most significant source of nitrogen dioxide and particulate pollution in this area.**
- **Shipley CofE school and other parts of Shipley are already above international (WHO) limits of nitrogen dioxide and particulate matter.**

The scheme has been working closely with the Council's Clean Air Plan team looking specifically at air quality at Shipley C and E School. This work will continue through both the development of the Bradford Shipley Route Improvement Scheme and implementation and monitoring of the Clean Air Zone as part of the Clean Air Plan. Born in Bradford will be looking at air quality and the impact on children within schools. They have been looking at Shipley C and E School and will continue for the foreseeable future. The collaborative approach between

the Bradford Shipley Route Improvement Scheme and Clean Air Plan teams is seen as beneficial to mitigate the impact of traffic in these locations.

In 2018 as part of the Bradford Shipley Route Improvement Scheme development, the Council has been operating / monitoring a network of passive diffusion tubes that measures NO₂. These have been located along Otley Road, Canal Road corridor and Manningham Lane corridor with one situated adjacent to the Shipley C and E school. This data will be used as evidence in the development of the scheme.

In 2019, the Council launched its no idling campaign across the district's primary schools. The campaign, called "We Care About Clean Air", aims to raise awareness of the harmful impact of air pollution on children's health, and to encourage drivers to switch off their engines outside the school gates. Further information can be found at:

<https://bso.bradford.gov.uk/content/we-care-about-clean-air>

In addition, Shipley C and E school falls within the recent Shipley / Saltaire 20mph Zone that supports the air quality agenda because it creates a better environment for walking and cycling with people feeling safer.

The Council is also launching a pilot scheme designed to encourage more sustainable and healthy travel for school children. The scheme will help to improve safety and pollution levels at the school gates; at the beginning and end of the school day. School Streets will be trialled at 11 primary schools across the district including Shipley C and E School.

The School Streets scheme will limit traffic on a number of roads close to schools at drop off and pick up times. This will mean the majority of vehicles will not be allowed to drive into these streets around schools at start and finish times. Separate access arrangements will be made for local residents and businesses while some vehicles, such as the emergency services, and those for people with mobility issues will be exempt. This will encourage safe walking and cycling to and from school, and prevent cars idling near school gates. There may be potential for further and more permanent traffic reductions on these streets in the future.

Ref 6. Concern 4. The lack of information on projected traffic, air quality and noise, for recent years or forecasts for the scheme.

- **No Council committee has received any report assessing current and projected traffic patterns with the proposed scheme, nor impact on air and noise pollution.**
- **Reports from an improved Bradford strategic traffic modelling system are not expected to inform any public consultation on this scheme.**

Whilst preliminary findings of the scheme principles have been summarised in previous reports, quantification on traffic, air and noise pollution will be presented in support of statutory processes as certainty about the scheme contents materialises. This further information will also be presented at future consultations.

Ref 7. Concern 5. The environmental danger of developing housing and transport systems that increase car use, rather than developing reduced carbon alternatives.

- **Recent housing in Bolton Woods is designed for two-car households and no bus service. The 'social hub' of the proposed new Urban Village includes a drive-thru Costa Coffee.**
- **Alternative approaches could reduce congestion and its impact by reducing traffic and emissions.**

The Council is acutely aware of the relationship between transport and land use planning, and the danger of building new neighbourhoods that cements high car use into people's everyday lives. This is reflected in our Homes and Neighbourhoods Design Guide, emerging updated Local Plan policies, and will be further addressed in the future with sustainable transport schemes.

New houses are subject to technical planning guidance and mitigations as part of the planning approval. The Homes and Neighbourhoods: A Guide to Designing in Bradford aims to ensure new housing and transport systems create Green, Safe, Inclusive and Distinctive neighbourhoods that create healthy communities for all.

[https://www.bradford.gov.uk/Documents/SupplementaryPlanningDocuments/Adopted%20SPDs/Homes%20and%20Neighbourhoods%20Design%20Guide%20SPD//Homes%20and%20Neighbourhoods%20-%20A%20guide%20to%20designing%20in%20Bradford%20SPD%20\(print%20version\).pdf](https://www.bradford.gov.uk/Documents/SupplementaryPlanningDocuments/Adopted%20SPDs/Homes%20and%20Neighbourhoods%20Design%20Guide%20SPD//Homes%20and%20Neighbourhoods%20-%20A%20guide%20to%20designing%20in%20Bradford%20SPD%20(print%20version).pdf)

Car club has recently expanded in the district with low emission vehicles located in Saltaire and Bradford City Centre. If demand shows a need for more vehicles in Bolton Woods, the Council can investigate options for a vehicle in the area.

High-profile public transport schemes such as Northern Powerhouse Rail and West Yorkshire Mass Transit will provide anchors for sustainable, low-car development.

Through the Emergency Active Travel Fund we have developed a portfolio of active travel interventions to complement existing infrastructure, such as the Canal Road Greenway. These provide high-quality, low traffic and segregated routes for cycling and wheeling, which will be further built on through this scheme and help us to bring about mode shift. Similar active travel interventions are planned in Bradford city centre and on Thornton Road through the Transforming Cities Fund, and at Queensbury Tunnel to Link Bradford and Halifax. We are working towards our Cycle Strategy goals of having a well-connected network of cycling routes.

The West Yorkshire Combined Authority has been awarded £12.5m from the Department for Transport's Active Travel Fund to deliver a programme of ambitious proposals to create more space for cycling and walking, while easing the pressure on public transport and relieving congestion. Further information including list of schemes can be found at:

<https://www.westyorks-ca.gov.uk/all-news-and-blogs/department-for-transport-s-active-travel-fund/>

Announced on the 11th March 2020, the Leeds City Region will benefit from £317m of investment from the Transforming Cities Fund (TCF) This will connect people to economic and education opportunities through affordable, sustainable transport, boosting productivity and helping create cleaner, healthier and happier communities for the future. Further information can be found at:

<https://www.westyorks-ca.gov.uk/improving-transport/transforming-cities-fund/#:~:text=The%20Leeds%20City%20Region%20Transforming,City%20Region%20commitment%20to%20become>

In addition to those above, information on various other projects and programmes in the city region can be found at: <https://www.westyorks-ca.gov.uk/projects/>

Ref 8. Concern 6. Consultation in 2019 did not support dual carriageway on Canal/Valley/Otley Roads, though it did support reduction of congestion.

- **Dual carriageway was not mentioned in the consultation survey. Support was for shorter journey times at peak hours, not an overall increase in traffic.**

The Phase 1A consultation in 2019 did present a possible option to widen the A6037 Canal Road route so that there are two lanes in each direction. Reducing traffic congestion and

journey times was considered the most important improvement for both corridors presented in the Consultation output report that can be found on the scheme website:
<https://www.yourvoice.westyorks-ca.gov.uk/bradfordshipley>

- Ref 9. The scheme is part of a 1 billion-pound West Yorkshire Plus Transport Fund to provide efficient economic growth. The report on the proposed scheme for Bradford-Shipley road traffic that led to its inclusion in the fund has not been made public, but its primary impact was “Access to new development”, supporting 960 jobs through housing and commercial development, and access into Bradford and the motorway network “from Airedale and beyond”.**

This scheme is important for access to new developments by providing better transport accessibility particularly from Airedale to Bradford and the motorway network. The character of the A6037 Canal Road / Valley Road corridor is better suited to these improvements for accessibility and accommodating strategic traffic. It also provides the opportunity to transform the A650 Manningham Lane route to a more sustainable transport corridor and discourage strategic through traffic.

- Ref 10. There appears to be a focus in the scheme for through traffic on Canal/Valley/Otley Roads. Although the scheme originally emphasised new housing, and although its current presentation focuses on cycleways and greening the valley, the gains are presented only as increased traffic capacity and reduced journey times. Some through traffic is needed to get between the Bradford area and the Skipton area, but there is no need to assume that it must involve more cars and freight rather than public transport, more efficient car use, more cycling, and diversion to routes away from bottlenecks.**

Transport schemes are assessed using the HM Treasury Five business case appraisal methodology (Strategic Case, Economic Case, Commercial Case, Financial Case, Management Case). At this stage of the projects development, the predominant assessment which is reviewed is the strategic context of the scheme followed by the economic assessment.

The economic assessment is undertaken using Department for Transport (DfT) Transport Analysis Guidance (TAG) approach which predominantly focuses on journey time benefits.

The final business cases will offer more of an opportunity to present the impacts of the scheme as designed, through a strategic case which will have more of a focus on the benefits for cycling and the local environment, which are fully intended to be benefits of the scheme. It will also present more impacts of the scheme in more detail associated impacts such as Carbon which have become more prevalent in the DfT approach since the Outline Business Case was produced.

An overview of Transport Appraisal:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938759/tag-overview.pdf

Information relating to other programmes and projects to support the Bradford Shipley Route Improvement Scheme and Councils objectives can be found in responses above particularly Ref 5 and 7.

- Ref 11. Larger roads with more traffic tend to discourage active travel (walking and cycling) and to socially separate communities which the roads drive through. While improving community safety and security in Manningham is an aim of the scheme by reducing traffic volume, the extra lanes planned for Canal/Valley/Otley Roads are likely to have the opposite effect.**

We recognise that severance caused by major roads is an issue of concern in several parts of the district. However, this scheme will result in traffic moving from the Manningham Lane route - a road which runs through several communities and dense housing along its length - to the A6037, where there is only very limited housing and a much greater concentration of businesses which are dependent on road access and volume traffic. There is a segregated cycle route that runs from Shipley adjacent to Canal road into Bradford City Centre, one being planned on the A650 Manningham Lane route as part of this scheme, and potential for more of this type in the area.

Ref 12. The impact of greater volumes of traffic on the bottleneck of Shipley beyond the scheme itself is not addressed at all. This includes the already congested stretch from the Branch junction (where Otley Road and Bradford Road meet) to Cottingley, and all the other routes through Shipley including along Saltaire Road and through Saltaire. To focus on the stretch up to Shipley and not address the rest of the through route up the Aire Valley is acceptable only if it does not create a negative impact on those other areas. The interests of all residents and businesses impacted by the scheme must be considered.

The scheme is still in development. The impact on said junctions and lengths of road can be summarised and presented at future engagements.

Information relating to other programmes and projects to support the Bradford Shipley Route Improvement Scheme and Councils objectives can be found in responses above particularly Ref 5 and 7.

Ref 13. The air quality in many Bradford schools is already acknowledged as above the recommended limits, including Shipley CofE, Wycliffe and Saltaire primary schools. The scheme has an aim of improved air quality but no statement about how this will be measured or achieved. In residents' interests, air quality must be improved for each school, not for the average over the whole scheme. Measurement must include both nitrogen dioxide and particulate matter that cause ill health. The impact of air pollution on health and mortality is well recorded (reports in the Guardian and from the British Lung Foundation). Research by the Bradford Institute of Health Research estimates that bad air quality is responsible for 254 deaths in the District annually preventable by reducing particulate matter well below international guidelines.

The scheme has been working closely with the Council's Clean Air Plan team looking specifically at air quality at schools. This work will continue through both the development of the Bradford Shipley Route Improvement Scheme and implementation and monitoring of the Clean Air Zone as part of the Clean Air Plan. Born in Bradford will be looking at air quality and the impact on children within schools. They have been looking at Shipley C and E School and will continue for the foreseeable future. The collaborative approach between the Bradford Shipley Route Improvement Scheme and Clean Air Plan teams is seen as beneficial to mitigate the impact of traffic in these locations.

Information relating to other programmes and projects to support the Bradford Shipley Route Improvement Scheme and Councils objectives can be found in responses above particularly Ref 5 and 7.

Ref 14. In the report of Community Consultation about the Branch Pub junction in 2018 run by Councillor Vick Jenkins and others, the first summary point reads "The consensus was that the overall volume of traffic is too high and that this is the main barrier/Catch 22 to walking and cycling being more popular. Measures should be taken to reduce the volume of traffic first and foremost. However, a level of cynicism about the capacity or desire of Bradford Council to reduce traffic or make the situation better for local residents (as opposed to facilitating the flow and throughput of traffic from 'wealthier areas') was palpable in the room."

The A650 through Shipley and Saltaire forms part of the Strategic Route Network and caters for both local and longer distance travel both of which are important to the area's economy.

Traffic reduction isn't a main aim of this West Yorkshire Plus Transport Fund project along the A6037 Canal Road / Valley Road route but does cater for more sustainable modes of travel along the A650 Manningham Lane / Keighley Road / Bradford Road route to encourage modal shift away from private car.

One of the implications of the climate emergency is that we all need to consider ways to reduce traffic in order to achieve the UK net zero target, as this is the only way to achieve Net Zero Carbon within an acceptable time-frame. As part of the government-funded Active Travel Fund, the Council have started action in some places in the district to encourage traffic reduction through mode shift, such as through Active Travel Neighbourhoods, temporary protected cycle lanes and school streets. The Council intends to pursue similar schemes of this nature in future, and areas around the A650 Manningham Lane route may be a focus for this. Residents should also see reductions in nuisance from heavy goods traffic as a result of the Clean Air Zone. In addition

The traffic model used to assess the impact of the scheme uses a comprehensive network of roads in the local area and wider district. Where issues are identified through this model that need further investigation, further detailed models may be used.

The traffic modelling outputs will be summarised and presented at future consultations and other statutory procedures such as applying for Planning approval.

Ref 15. Drivers naturally want reduced congestion to avoid frustrating waits and accidents, and generally to improve health. That desire may be best addressed by reducing the volume of motor traffic, not by increasing it, and indeed it is Bradford Council's aim to reduce the volume of traffic in the District as a whole.

See response above (Ref 14)

Ref 16. The original aims in 2012 focused on housing, employment, and access into Bradford and the motorway network "from Airedale and beyond". The strategic aims of economic growth through inward investment and increased capacity for the road system overall, that are revealed in an appendix to the 2019 report, are not emphasised in the recent reports going to Councillors, nor in the public consultation.

With regards to the development of scheme objectives, it is normal for them to develop and be refined from the very early conceptual stages particularly over a span of 7 years that aims to accommodate new policies and strategies.

Specific, measurable, achievable, realistic and time-bound (SMART) objectives are being developed as part of the Full Business Case work which contain a measurable element enabling direct assessment of the proposed intervention. Furthermore, Monitoring & Evaluation and Benefits Realisation Plans will be refined as part of the FBC which will provide a framework for monitoring and measuring the success of the intervention against expected benefit yield.

It appears as though there may have been a misunderstanding between the differences of summaries of scheme benefits, scheme objectives and strategic context. The project team will look to make the objectives clearer in future engagements.

Ref 17. The variety of aims in different reports, usually without quantified targets, presents a problem for due diligence in assessing the scheme's value. A strategy to achieve clearly defined benefits from the scheme, including intended responses if they are not achieved, would be appropriate but has not been made available to date.

Please see response above (Ref 16)

Ref 18. No report has been released detailing the traffic and other modelling that has been undertaken to justify the claims for the scheme in the approval of its Outline Business Case (OBC). The targets are not quantified except occasionally as 'improvement' rather than by how much. Some headline figures were presented to WYCA (see above) and to Bradford Council's Executive Committee on 7th January 2020 where the OBC was approved, but there the basis for these figures was not released, and the Council believes the figures are, in any case, based on out-of-date traffic modelling data. Requests for a precise target, for example of air quality, have not been answered yet beyond the general need for the Nitrogen Dioxide levels to be reduced to below legal limits within the Clean Air Zone (CAZ) which is now due to be introduced in 2022 (more on the CAZ below under 'Climate Emergency'). For example, is air quality to be improved in each section of the route, and specifically improved outside each residential and school area, and by which years, or is an overall average improvement the target, or only keeping within legal limits?

As discussed above (Ref 5) the Council is undertaking a lot of air quality monitoring and is committed to ensuring air quality is compliant within the scheme area. Further information about the Clean Air Zone can be found at:

<https://www.bradford.gov.uk/breathe-better-bradford/breathe-better-bradford/#:~:text=Clean%20Air%20Zones%20are%20being,who%20live%20and%20work%20there.&text=Private%20cars%20and%20motorbikes%20will,in%20zones%20in%20other%20cities.>

The scheme is still in development however the project team have made efforts to engage early and frequently with stakeholders and members of the Public on the Bradford Shipley Route Improvement Scheme. Whilst this affords many benefits it unfortunately may provide the impression that the scheme is at a more advanced level of development than it is or needs to be at any particular stage. In this instance the modelling and assessments undertaken to date were appropriate to support the proposals through Outline Business Case and are currently being developed further to a level of detail sufficient for the Full Business Case and other statutory procedures.

The refined modelling outputs will be summarised and presented at future consultations and through other statutory procedures.

Ref 19. The government report on modelling induced demand for traffic, expects 20% of new road capacity to be taken, on average, by traffic that would not have previously used the route ('induced traffic' attracted from other routes, or from other modes of transport). The report expects more than 20% extra 'induced' traffic in urban currently congested routes. The report was prepared by WSP Ltd, the same company that created and is operating the new traffic model to be used for this scheme by Bradford Council. Induced demand is difficult to model, and sometimes it is minor (as with the Humber Bridge) or very major (as with Hammersmith Bridge). Avoiding induced demand is essential for this scheme. According to the consultation materials, "Our proposal to improve Canal Road / Valley Road will increase capacity so that a lot of the non-local traffic can be taken off Manningham Lane", but if the scheme attracts other traffic it would not achieve its aim of decongestion and only pile extra pressure on other parts of the system that have not been addressed.

The current guidance suggests to account for the impact of induced traffic through incorporating a Variable Demand element in the strategic model which the Bradford Strategic Transport Model (BSTM) does.

The scheme includes a sustainable transport corridor providing benefits for walking, cycling and public transport such as the incorporation of a segregated cycleway, extensive 20mph zone, red route camera enforcement and traffic calming. These combined measures will help encourage modal shift away from private vehicles.

The quantum of induced traffic is dependent on the nature of the scheme. The "new trips" are not exclusively new network trips, rather they arise from changes in behavioural response due to additional capacity provided by the scheme. In this respect the behavioural response is the trip reassignment, trip re-distribution and potential change due to the scheme. These are explicitly modelled through variable demand work.

The report that is referred to is entitled "Latest Evidence on Induced Travel Demand" which was produced by WSP for the government as part of a literature review. One of the key findings is that a 10% increase in road capacity could lead to 2% induced demand in the scheme area (measured in vehicle kms). These are the redistributed and reassigned trips rather than totally new trips on the network. Further work has been undertaken by WSP on behalf of DfT to deepen the understanding of how to address induced travel which is expected to be published in 2021.

The Bradford Shipley Route Improvement Scheme is working with WSP on the transport modelling for the Full Business Case and are part of the wider project development team.

Information relating to other programmes and projects to support the Bradford Shipley Route Improvement Scheme and Councils objectives can be found in responses above particularly Ref 5 and 7.

Ref 20. Who goes where and why? The composition of the traffic – short- and long-distance, commuting, school runs, shopping, leisure, freight, and especially how much of it is through traffic that could go elsewhere and how much of it is local traffic that could be reduced, is key to providing transport solutions. No information has been made available and perhaps it has not been collected. It is a major task but the existing routing of traffic is needed to be confident about the impact of the road scheme.

The composition of the traffic in the BSTM follows DfT appraisal guidance which is a national approach to assessing transport schemes. TAG guidance includes both long and short distance trips which encapsulate all of the trip purposes mentioned. Furthermore, the BSTM model has been validated / calibrated based on TAG guidance and independently verified by the Combined Authority's appraisal team.

Transport Analysis Guidance (TAG) The Transport Appraisal Process:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938766/tag-transport-appraisal-process.pdf

Ref 21. Ten to fifteen extra air quality monitoring sites have been established two years ago, including outside Shipley CofE school. They will provide valuable data relevant to the scheme, and on the temporary impact of lockdown. No results will be available until Spring 2021, after the public consultation on the scheme.

Extra air quality monitoring sites have been installed to assist the development of the scheme as described in the above response (Ref 5). Air quality data will be summarised and presented at future consultations and other statutory procedures such as applying for Planning approval.

Ref 22. A report of public consultation leading up to the OBC, was published in August 2019. It gave a one-dimensional summary of the responses to each question asked. The key result used in later reports was of 64% support (good or very good) for the scheme, derived from a question that reads in full: “Our proposal is to improve Canal Road / Valley Road to increase capacity so that a lot of the non-local traffic can be taken off Manningham Lane. As part of this plan we would also like to make significant improvements to road junctions to reduce queuing traffic – what do you think about the proposal?”

Answers (with number of responses in brackets): Very Good 26% (168), Good 38% (247), Neutral 16% (103), Bad 9% (60), Very bad 8% (50), Don't know 4% (24). In survey design, a question that asks opinions of something framed as desirable ('traffic taken off Manningham Lane, ... significant improvements to road junctions, ... reduce queuing traffic) is known as 'a leading question', likely to get a positive response. This question does not mention dual carriageway, nor increasing capacity beyond that needed to accept traffic from Manningham Lane. It is perhaps instructive that even then fully one third of respondents (33%) responded with neutral, bad, or very bad. A multidimensional analysis would have asked whether those against were car users, lived locally, and so on, as would also have been helpful in the analysis of other questions.

In drafting questionnaires, we balance translating complicated technical concepts into non-technical language and providing an appropriate level of detail in the question to enable the respondent to understand and respond.

In this instance we believe we have struck the optimal balance with the question posed and that the question describes the proposals and their purpose in the best neutral, non-technical language possible.

With regards to the analysis undertaken we believe that this was appropriate for this stage of design particularly given the further consultation opportunities that have / will be provided prior to final approval and construction.

For those members of the public that wish to have more detailed discussions on the concepts, face to face meetings were previously arranged with members of the project team. This will be something we can also possibly do at consultations in the future.

Ref 23. At what point will there be public consultation about the scheme's shape and principles, informed by evidence on current [and] forecast traffic and its impacts compared to doing minimal changes and other scenarios?

The schemes shape and principles are driven by many constraints such as objectives, budget allocation and on various assessments such as modelling. The schemes shape has included feedback from past consultations and has been approved by the Combined Authority at Outline Business Case stage and approved in Principle by Executive in January 2020. Through further development of the scheme (working towards Full Business Case), further opportunity will be available to help refine the scheme further during future consultation however we cannot provide a precise date at this time.

Ref 24. At what point were councillors consulted with evidence on current and forecast traffic and its impacts? Please can we see that evidence, and any other evidence in the public domain? [We] have unsuccessfully searched in online reports submitted to Council meetings.

Councillors are not typically consulted specifically on individual technical points such as these or placed in the public arena particularly as the scheme is still under development. It is normal practice to provide councillors a high-level briefing note about schemes in their wards which

may lead to requests for more detailed briefings with officers to take place. These are facilitated upon request of the specific councillor as required.

Evidence of current and forecast traffic including impacts will be summarised and presented at future consultations and other statutory procedures such as applying for Planning approval.

Ref 25. When will the methodology of the Bradford Strategic Transport Model be released publicly, including how future demand induced by larger capacity [is estimated], which is a major concern, and the assumptions made in the scenarios and the handling of uncertainty? The Council has offered to consider a presentation [of the model] during the consultation. However, openness about methods and assumptions is fundamental to evidence-based policy. [We] trust that this can be addressed now, to underpin public confidence in the decision-making.

The Bradford Strategic Transport Model (BSTM) is developed in compliance with the National guidance TAG M4 to develop an uncertainty log which record development and infrastructure assumptions and have been applied in the forecasting. The projected traffic growth is driven by increase in population, vehicle operating costs (VOC), increase in car ownership, economic activities and demand of new household. Two sensitivity tests have been modelled (high growth & low growth) as defined in TAG M4.

TAG Unit M4 – Forecasting and Uncertainty:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938878/tag-m4-forecasting-and-uncertainty.pdf

Ref 26. Can you provide the OBC with sensitive parts redacted – again to assess the evidence on the impact of the scheme.

The scheme is still under development and data is changing frequently as options are developed, assessed and refined therefore not appropriate to share these at this time. Evidence summarising the Full Business Case will be provided through further consultations and other statutory processes eg. Planning approval.

Ref 27. Can you provide the analysis that results in the Benefit-Cost Ratios presented in Table 2 of paragraph 3.5 in the January CBMDC Executive meeting, including the ‘Do Minimum’ option?

The benefit-cost ratio (BCR) indicates how much benefit is obtained for each unit of cost. As these documents including associated BCR are still in development and will continue to evolve as we refine our proposal, it is therefore not appropriate to share these at this time. Evidence will be provided through further consultations and / or engagements and other statutory processes eg. Planning approval.

Ref 28. At what point will Council traffic modellers be able to accept alternative options to judge their impact relative to the proposals?

A comprehensive and robust process has been adopted for generating and shortlisting options for the Bradford Shipley Route Improvement Scheme that will lead to the ultimate scheme option. Options have been compared and filtered through a multi criteria assessment framework against Critical Success Factors. A series of intervention concepts were identified and formed the basis of the “short list” options. These options are still in development and undergoing various assessments such as transport modelling and will continue to evolve as we refine our proposals.

The schemes shape and principles are driven by many constraints such as objectives, budget allocation and on various assessments such as modelling.

Ref 29. The original plan for West Yorkshire Plus Transport Fund (eg 2013 approval in principle by Bradford Council), is subject to satisfactory returns form the Earn Back scheme of business rates. What is the status of that scheme now, and of alternative financial returns?"

The concept of earn back from business rates increases was discussed in the earliest stages of the development of the Transport Fund, well before its formal inception. However, it was discarded early on. The final agreement is that the Government will pay £30 million per year of gain share funding for a 20-year period (£600 million) which relates to wider improvements in the economy resulting from the implementation of Transport Fund projects.

The £30 million per year is a guaranteed payment subject to formal evaluation of the impact of the Transport Fund which takes place every 5 years. This is an independent evaluation, referred to as a Gateway review, the first of which was undertaken in 2019. Confirmation was received from Government in May 2020 that the West Yorkshire plus Transport Fund had passed the 2019 review and that the £30 million per year for the 5-year period 2021/22 to 2025/26 would be paid. The next review will take place in 2024 (The funding outstanding at that point will be £270 million) which the Combined Authority will need to pass the 2024 review in order to receive confirmation of the next five years of funding. A final Gateway review will be held in 2029 which the Combined Authority would need to pass to receive confirmation of the final 4 years of funding.

It is also likely that a full final evaluation of the impact of the programme will be required once all Transport Fund projects have been completed.

Ref 30. Adjustments that could include Park and Ride, 'last mile' solutions, active travel, incentives and disincentives to reduce car use (including car-share and working at home), diversion of through traffic to routes that avoid bottlenecks, Mass Transit, off-road parking, all deserve urgent attention when discussing the final form of this scheme. Park and Ride at Shipley station is part of the same W Yorks + Transport Fund, with expanded parking planned for 2024, but there is no mention of a ride scheme. It may attract more traffic to Shipley for commuters to Leeds, rather than aid decongestion on this route.

In addition to the response above (Ref 28) there are plans to extend the number of car parking spaces at Shipley train station. The aim is to reduce the overall distance travelled by private vehicles, encouraging modal switch onto rail services and we do have secure cycle parking at the station to encourage people to cycle where possible to access the rail network.

There are many active mode initiatives being delivered across the Leeds City Region as part of the CityConnect programme such as the newly opened dedicated cycle route from Shipley to Bradford to encourage active mode use.

As part of the March 2020 Devolution Deal, the Combined Authority secured some initial funding to complete feasibility investigation into a long term low carbon mass transit system for the region so as to enable us to help achieve our carbon reduction ambitions, deliver clean growth and to provide 21st century transport infrastructure for the Leeds City Region.

Information relating to other programmes and projects in the city region such as creating additional parking at rail stations "Park & Rail" to support the Bradford Shipley Route Improvement Scheme and Councils objectives can be found in responses above particularly Ref 5 and 7.

Ref 31. The route lies entirely within Bradford's Clean Air Zone (CAZ), approved by Bradford Council on 18th Feb 2020, which aims to achieve legal levels of air quality as soon as possible. The Council's plan is to penalise the oldest type of lorries, buses and taxis and encourage less-polluting forms of traffic within the Zone. It is not the time to pull back from such initiatives, nor to accept lower targets of air quality. It is the time to ensure a serious reduction of emissions and a much better air quality, as part of Bradford Council's Breathe Better policies, and its commitment to reduce traffic in the District. The CAZ in Bradford is focused on reducing nitrogen dioxide emissions, and does not aim to reduce particulate pollution in any systematic way. Particulate pollution will continue as long as motor vehicles use the roads, regardless of cleaner fuels or electric power.

We recognise that the CAZ is planned to reduce NO₂ emissions but will not immediately address particulate emissions due to tyre and brake wear if traffic remains at constant levels however cleaner vehicles have particulate filters that will help remove particulates. The Council are considering ways in which we might use the CAZ to further reduce particulate emissions, including the shift of more traffic from roads i.e. shifting Heavy Goods Vehicles (HGV's) – road haulage to the rail network.

Ref 32. Current government assessment of traffic schemes favour reducing car journey times over other forms of transport. It would be better to aim high, to use every lever possible to encourage healthier futures through healthier government, including healthy alternatives to car use wherever possible. This is not only a matter of avoiding emissions, but also favouring physical exercise for its positive health outcomes.

Current Government assessment methodologies do prioritise reductions in journey times for car drivers. We recognise however that a combination of climate change and COVID-19 have significantly shifted transport priorities nationally and locally towards better promoting health through transport, including active travel.

In response to the climate emergency there are several drivers such as Bus Back Better and active travel that will be taken forward. Until such time the government changes methodology to assessing schemes towards these, we are limited to local interventions for assessing separately.

Yours Sincerely

James Williams
Senior Engineer