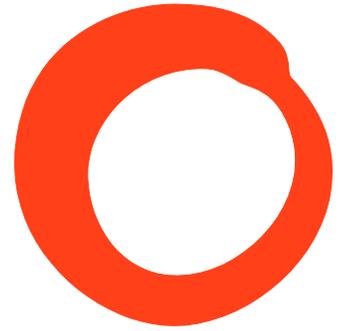


July 2012

Submission to the Welsh Government

in response to

Consultation Document WG15491: Active Travel (Wales) Bill White Paper



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Summary

Friends of the Earth Cymru has proposed a number of interventions that should be included in this Bill in order to increase the numbers of people walking and cycling. They are:

- A default 20mph speed limit in urban areas and rural towns and villages
- Mandatory cycle proficiency test as part of the driving test
- Traffic entering or exiting a road from/to side roads giving way to dedicated cycle lanes
- Pedestrian priority at non-signalised junctions
- Introduce a 'presumption of liability'
- Daytime running lights
- Increasing the proportion of the Welsh Government transport budget spent on active travel
- Provision of paths with all new road developments
- Strong guidance in support of Workplace Parking Levies

Introduction

The Welsh Government's stated aim in this process is to seek views on whether local authorities should have a duty to:

- Identify and map the network of routes within their areas that are safe and appropriate for walking and cycling;
- Identify and map the enhancements that would be required to create a fully integrated network for walking and cycling and develop a prioritised list of schemes to deliver the network;
- Deliver an enhanced network subject to budget availability and following due process;
- Consider the potential for enhancing walking and cycling provision in the development of new road schemes

Friends of the Earth Cymru is delighted that this consultation also asks:

“Is there anything else that you would like us to consider as part of the development of the Active Travel Bill, or wider activity to encourage walking and cycling?”

Given that “some of the major barriers that are preventing more people from walking and cycling” are much wider than those relating solely to local authorities' proposed duties, the Minister rightly acknowledges that:

“Getting from where we are now to the Wales I want to see is going to need more than just new cycle paths and footways. We are looking at a cultural change...”¹

In the context of a disappointing 36% increase in road fatalities between 2010 and 2011² this cultural change is all the more necessary and urgent. We know of the virtuous circle that exists between drivers reduce their travelling speeds when there are more pedestrians, for example³. It is in this spirit of wholesale cultural change in transport that our options for improvement are offered.

¹ Welsh Government, May 2012, [Consultation on Active Travel \(Wales\) Bill](#), Ministerial Foreword

² Wales Online, 18 July 2012, [Call for clearer safety vision after 36% rise in road deaths](#)

³ TRL Limited, 2005, [Factors influencing pedestrian safety: A literature review](#), p.36

Options for Improvement

Friends of the Earth Cymru would like to offer some additional options for increasing the numbers of people walking and cycling. Some of these are truly innovative and distinctive and many have significant life-saving potential. Some are ready for inclusion in the Active Travel (Wales) Bill while others might need devolution of further powers.

Option 1 – Default 20mph speed limits

There are many reasons to favour a default 20mph speed limit in urban areas and rural towns and villages. One of these is that it increases the number of people walking and cycling. The other benefits – which could in the context of this Bill be described as ‘fringe’ – are of critical importance in relation to other Welsh Government aims, including road safety and cutting greenhouse gas emissions. We are much heartened to see 20mph limits specifically mentioned in this consultation as a way to improve safety for pedestrians and cyclists.

Speed reduction is the outstanding means to **reduce fatalities**. A 10% reduction in the average speed of traffic has been estimated to reduce the number of road accident fatalities by 38%. By way of contrast, a 10% overall reduction in drink-driving would give a reduction in fatalities of 1%, while the same reduction in non-wearing of seat belts would lead to 0.8% fewer fatalities⁴.

The Welsh Government’s Road Safety Strategy notes:

“Vehicle speed is not just a problem on non-built up roads. In built-up areas, where there are much larger concentrations of pedestrians and cyclists, the speed of vehicles is a major factor in collisions and casualties. Even at the normal 30mph limit, 4 out of 10 pedestrians who are hit by a motor vehicle (travelling at a legal speed) will die”⁵.

The Strategy draws on research that shows that 20mph zones reduce average motor vehicle speed by 9mph and collisions by 60% (67% of collisions involving children and 29% involving cyclists).

In the 9 years since the Strategy’s publication, new research has been published that supports further action on 20mph limits. The Transport Research Laboratory conducted both road-based and driver-based studies that provided “clear evidence” that each 1mph reduction in average speed leads to a 5% reduction in collision frequency⁶. Greatest potential for collision reductions were found to be in urban areas with low average speeds.

Pedestrians and cyclists constitute a high proportion of killed and seriously injured (KSI) road casualties in Wales (Figure 1). The figures for 2011 were particularly bad, with pedestrian KSI reaching 21% (nearly as

⁴ Institute of Transport Economics, 2004, [Speed and road accidents](#), p. 89

⁵ Welsh Assembly Government, January 2003, [Road safety strategy for Wales](#)

⁶ Transport Research Laboratory, 2000, [The effect of drivers’ speed on the frequency of road accidents](#)

high as the 22% 1994-1998 baseline) and cyclist KSI at 9% being far and away the worst in recent history. These are among the highest proportions in Europe⁷.

20mph zones are a good way of reducing pedestrian fatalities, since most pedestrian fatalities (and injuries) occur in 30mph zones⁸ and speed is the most important predictor in determining impact survival (Figure 2).

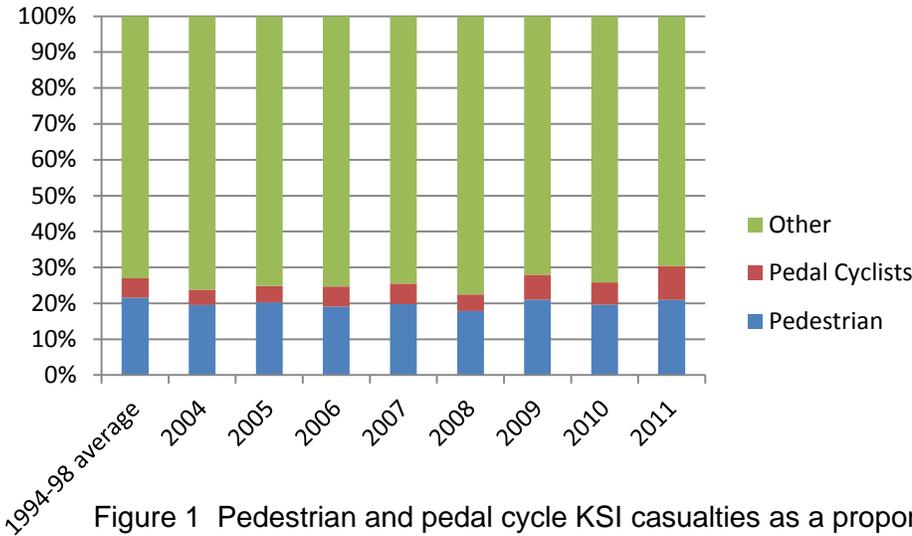


Figure 1 Pedestrian and pedal cycle KSI casualties as a proportion of the total⁹

Probability of injury from OTS data, using Police severity (slight, serious, fatal)

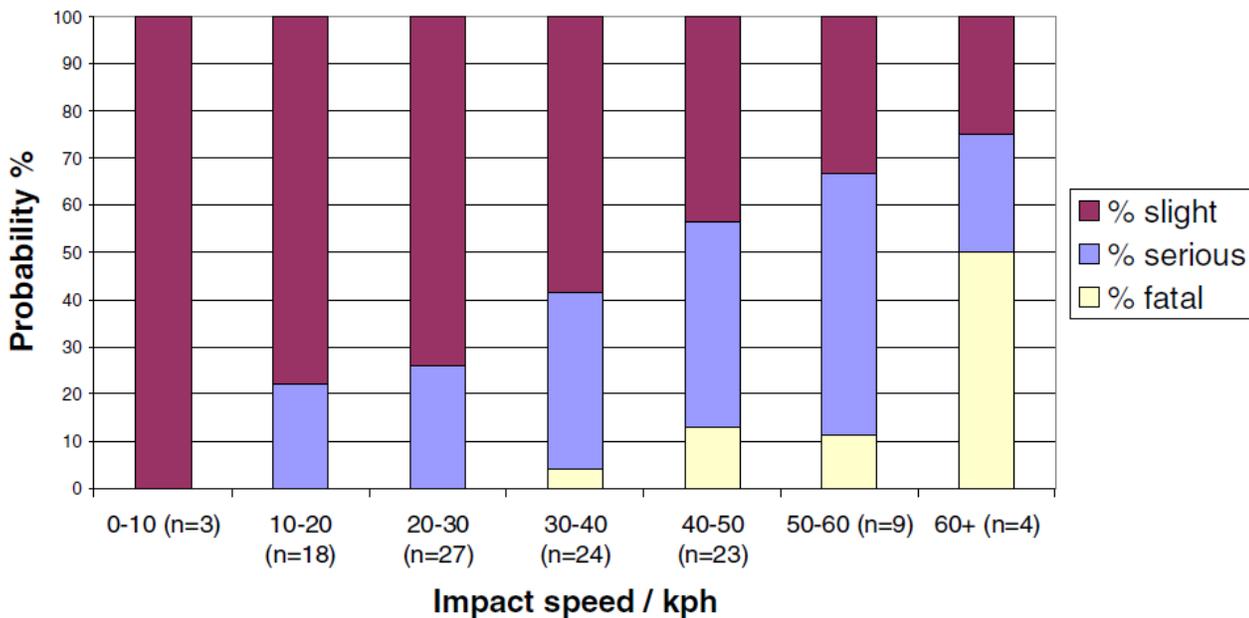


Figure 2 Graph showing severity of injury at different impact speeds (speed in km/h)¹⁰

⁷ Alnaqbi K, 2009, [Investigation of pedestrian accidents analysis at signalised pedestrian crossings in Edinburgh](#)

⁸ 20's Plenty for Us, undated, [UK casualty maps](#)

⁹ Data from <http://wales.gov.uk/docs/statistics/2012/120626pedestrian11en.xls>

Hull established widespread coverage of 20mph zones which covered 500 streets by 2003. Within these zones there was a 56% decrease in traffic accidents, and a 90% decrease in serious and fatal injuries¹¹. The biggest reduction was among child pedestrians, where casualties fell by 74%.

Portsmouth City Council was the first local authority in England to establish an extensive area-wide 20mph limit without traffic calming, covering 94% of its formerly 30mph-limited roads. It declined to comply with Department for Transport advice that “20mph speed limits should be used for individual roads, or for a small number of roads”. Road casualties fell by 22% during the following two years (as opposed to a 14% reduction in comparable areas nationally)¹².

Casualty reduction in London has been even more dramatic. A study published in the British Medical Journal in 2009 concluded:

“The introduction of 20 mph zones was associated with a 41.9% reduction in road casualties, after adjustment for underlying time trends. The percentage reduction was greatest in younger children and greater for the category of killed or seriously injured casualties than for minor injuries. There was no evidence of casualty migration to areas adjacent to 20 mph zones, where casualties also fell slightly by an average of 8.0%. 20 mph zones are effective measures for reducing road injuries and deaths”¹³.

The Royal Society for the Prevention of Accidents has conducted a review that concluded:

“Speed significantly increases the chance of being injured in a collision. Studies which compare injury severity with vehicle speed show that accidents at speeds above 20mph are more likely to result in severe injuries, rather than slight injuries¹⁴. The risk of being fatally injured increases too, and a UK study of accidents found that at 20mph there was a 2.5% chance of being fatally injured, compared to a 20% chance at 30mph¹⁵. Similarly a study in Sweden concluded that the risk of fatality injury at 50km/h is twice as high as at 40km/h and five times as high as 30km/h¹⁶”.

There is an important social component to casualty statistics: Research has demonstrated that children from the lowest socioeconomic group in England and Wales are five times more likely to be injured in accidents than those from the highest¹⁷.

¹⁰ Cuerden R *et al.*, 2007, [Pedestrians and their survivability at different impact speeds](#)

¹¹ Brightwell, S, 2003, [Hull Reaps Road Safety Rewards From Slowing the City's Traffic](#), Local Transport Today: 10-1.

¹² Department for Transport, September 2010, [Interim evaluation of the implementation of 20mph speed limits in Portsmouth](#)

¹³ Grundy C *et al.*, 2009, [Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: Controlled interrupted time series analysis](#)

¹⁴ Cuerden R *et al.*, 2007, [Pedestrians and their survivability at different impact speeds](#)

¹⁵ Ashton SJ and Mackay GM, 1979, *Some characteristics of the population who suffer trauma as pedestrians when hit by cars and some resulting implications*, 4th IRCOBI International Conference, Gothenborg.

¹⁶ Rosén E and Sander U, May 2009, [Pedestrian fatality risk as a function of car impact speed](#), Accident Analysis & Prevention Volume 41, Issue 3, Pages 536-542

¹⁷ Roberts I and Power C, 1996, [Does the decline in child injury mortality vary by social class? A comparison of class specific mortality in 1981 and 1991](#), BMJ 1996; 313 : 784

The Commission for Integrated Transport reviewed the evidence on 20mph zones and concluded that they had:

“been fundamental in prompting both **strong growth in walking and cycling** and in the ability of public transport to compete with the private car. The balance has been shifted away from “movement space” to “exchange space” where the focus is on personal interaction in quality urban space rather than on mobility in car dominated streets... This initiative has helped transform the case study cities across Europe from being noisy, polluted places into vibrant, people centred environments as well as facilitating the widespread re-allocation of street space to public transport, cycling and walking to meet increased demand”¹⁸.

This was borne out spectacularly in Hull. In a poll of residents carried out in 2000, more than 25% said they walked and cycled more as a result of the 20mph zones, with more than half saying that these areas were now more pleasant places to live and 60% saying that more children played in the street. 80-100% of people are in favour of the 20mph zones¹⁹. Research from Bristol City Council indicates that pedestrian and cycling activity increased by up to 12% in 20mph zones²⁰

It is not surprising that speed reduction has a strong impact on increasing people’s cycling. Fear of traffic is one of the most enduring barriers to uptake of cycling, as the consultation document acknowledges, with 60% of people (71% of women) of the opinion that cycling on roads is “too dangerous”²¹. Indeed, two of the seven policy suggestions made in recent research are:

“it is essential that the urban environment is made safe for cyclists and pedestrians”

and

“there need to be effective restrictions on traffic speeds, parking and access on residential roads and other routes... so that both cyclists and pedestrians feel that they have a safe and convenient environment in which to travel. This could include 20mph speed limits and resident-only access by car in some areas”²²

In summary, 20mph zones:

- Are popular with residents and drivers²³
- Significantly reduce collisions and road casualties
- Increase the numbers of people who walk, cycle and use public transport
- As a result improve air quality, reduce greenhouse gas emissions and reduce congestion

As the Welsh Government’s Road Safety Strategy makes clear, local authorities in Wales are now legally enabled to set 20mph zones in residential areas, town centres, outside schools and “on roads used by

¹⁸ Commission for Integrated Transport, 2001, [Study of European best practice in the delivery of integrated transport: key findings](#)

¹⁹ Select Committee on Transport, Local Government and the Regions, March 2002, [Memorandum by Kingston upon Hull City Council](#)

²⁰ Greater Bristol Cycling City, June 2011, [End of project report](#)

²¹ Department for Transport, December 2010, [Climate change and transport choices](#), p.151

²² Pooley CG, 2011, [Understanding walking and cycling](#)

²³ Just 14% of drivers, and 5% of non-drivers, oppose 20mph speed limits on residential streets:

<http://assets.dft.gov.uk/statistics/releases/2011-british-social-attitudes-survey-attitudes-to-transport/bsa-2011-report.pdf>

cyclists, pedestrians and horse riders”. In the Welsh Government’s Road Safety Strategy, the following actions relate to 20mph speed limits:

- More 20mph zones to be established
- Develop a pilot scheme of 20mph zones using different approaches: signs only, gateway features, and traffic calming/road reallocation
- Ensure that 20mph is the normal speed in new residential developments unless there are exceptional circumstances

Friends of the Earth Cymru would like to see this Bill used to implement a **default 20mph speed limit in urban areas and rural towns and villages** unless there are “exceptional circumstances”²⁴ for adopting an alternative speed limit.

Given that these powers may not be devolved, and bearing in mind the time that can elapse between asking for powers and receiving them, in the interim the Welsh Government should issue guidance providing a much stronger line on 20mph speed limits. This guidance could require local authorities to reconsider all 30mph zones with a view to reclassifying them as 20mph zones unless there are exceptional circumstances.

Option 2 – A mandatory cycle proficiency test as part of the driving test

If Wales is to become a nation where cycling is seen as a wholly natural transport activity then there could be little better way for this to occur than adding a cycle proficiency test²⁵ as a mandatory component of the driving test²⁶.

There would be many benefits to such a scheme:

1. All new drivers would develop a much greater awareness of cyclists, thereby engendering the adoption of driving techniques more sympathetic to cyclists. This would have a direct impact on reducing the fear of traffic for cyclists and potential cyclists.
2. Some new drivers who would not otherwise have considered cycling as a viable form of transport might use bicycles for some of their journeys.
3. Some new drivers who might otherwise never have learned to cycle would pick up this useful life-long skill, providing them with an option later in life to cycle. This would enhance their prospects for low-cost mobility if, for example, they were banned from driving or found they could not afford a car (as the consultation document recognises)²⁷.
4. It would have a major impact on cycle proficiency skills employment, generating additional employment in the green economy.
5. It would be a distinctive, innovative Welsh scheme with no parallel elsewhere in the world, providing a strong brand of Wales as a road safety nation.

²⁴ Welsh Assembly Government, January 2003, [Road safety strategy for Wales](#)

²⁵ To Level 3 of the National Standard for Cycle Training: <http://www.dft.gov.uk/topics/sustainable/cycling/national-standard>

²⁶ Exceptions could be included in the legislation for people who for reasons of physical disability are not able to cycle

²⁷ Welsh Government, May 2012, [Consultation on Active Travel \(Wales\) Bill](#), p.5

Consent would presumably need to be obtained from Westminster to add this new component to the driving test in Wales.

Option 3 – Traffic entering and exiting a road from/to a side road to give way to dedicated cycle lanes

The assumed (and legally encoded) primacy of motorised transport over non-motorised transport creates barriers to people walking and cycling. This is a problem which the consultation document acknowledges, with a desire to prioritise “non-motorised transport users over cars”. Options 3, 4 and 5 go some way towards reducing the primacy of motorised transport.

Many dedicated cycle lanes run alongside existing highways, and some of these are frequently interrupted by side roads and access roads. Current highway regulations give the right of way to traffic entering and exiting via these side roads even though such traffic is generally travelling at very low speed, and even though this right of way results in cyclists having to interrupt their journey, often in the absence of any traffic. Giving the priority to the cycle lane would create a cultural change in road users such that they would become aware that cyclists frequently use the route and have right of way.

This is a particularly common feature of traffic prioritisation in Western Europe, with France and the UK two of the only countries to give primacy to highway traffic at side roads²⁸.

Option 4 - Pedestrian priority at non-signalised junctions

The primacy of highway traffic at junctions substantially reduces the ease with which pedestrians make their way around towns and villages. Again, the consultation document acknowledges the important relationship between facilitating people walking in communities and the proportion of journeys undertaken by foot:

“The third significant barrier is the lack of a walking and cycling culture, where walking and cycling is seen as the most natural and obvious way of making shorter journeys”²⁹.

In some European countries (e.g. Norway and Denmark (Figure 3)), junctions that are not controlled by traffic lights have pedestrian crossing strips (Zebra crossings) as a matter of course. Pedestrians have right of way at these junctions, which makes walking a much easier and more convenient form of transport – particularly around towns. It also reduces the incidence of people crossing roads at places other than junctions³⁰, and since this is where most pedestrian collisions occur³¹ it is known that interventions that “give right of way to pedestrians” reduce both the frequency and severity of pedestrian casualties³².

²⁸ Commercial Motor, January 2008, [How the rules of the road differ across Europe](#)

²⁹ Welsh Government, May 2012, [Consultation on Active Travel \(Wales\) Bill](#), p.9

³⁰ Personal evidence from visiting Denmark – no incidences noted of people crossing roads not at designated crossing points

³¹ TRL Limited, 2005, [Factors influencing pedestrian safety: A literature review](#), p.21

³² Norwegian Centre for Transport Research, 2007, [Making Vision Zero real: Preventing pedestrian accidents and making them less severe](#), p.19



Figure 3 Road junction in Hamar, Norway http://www.flickr.com/photos/loose_grip_99/2535820294/

The significant increase in pedestrian fatalities between 2010 and 2011 (17 to 24) suggests that any additional measures that afford higher profile to pedestrians will improve Wales' pedestrian safety record still further, particularly given that nearly half of all KSI pedestrian accidents happen on roads that are 'other roads' (not motorways, A roads or B roads – principally local roads)³³.

We look forward to seeing the guidance that the Welsh Government proposes to bring forward to “enforce the hierarchy of road users, prioritising non-motorised transport users over cars”³⁴.

Option 5 – Introduce a ‘presumption of liability’

A ‘presumption of liability’ (sometimes known as ‘strict liability’³⁵) means that a motorist will be liable for a crash with a cyclist (or other vulnerable road user) unless the motorist can show that the cyclist was at fault³⁶.

“A presumption of liability would normally work by shifting the burden of proof. So after a crash, a cyclist wouldn’t need to prove that the driver did something wrong; it would be for the driver to prove that he didn’t do anything wrong (or that the collision was caused by the cyclist doing something wrong)”³⁷.

This concept already exists in countries such as Germany, Denmark, the Netherlands and Austria³⁸, and has been credited with increasing walking and cycling rates. It would almost certainly have the effect of

³³ Table 7 of <http://wales.gov.uk/topics/statistics/headlines/transport2012/1206262/?lang=en>

³⁴ Welsh Government, May 2012, [Consultation on Active Travel \(Wales\) Bill](#), p.3

³⁵ Card, Cross and Jones, [Criminal law](#)

³⁶ UK Cycle Rules, 16 November 2010, [‘Strict liability’ and legal protection for cyclists](#)

³⁷ *ibid*

³⁸ Cambridge Cycling Campaign, January 2010, [Should motorists be liable for their cars’ ‘operating risk’?](#)

depressing the fear of traffic among potential cyclists – and hence increasing uptake – because it would encourage drivers to become much more considerate of vulnerable road users.

The argument in favour of presumed liability dates back to at least 1982, when Lord Denning said:

“In the present state of motor traffic, I am persuaded that any civilised system of law should require, as a matter of principle, that the person who uses this dangerous instrument on the roads—dealing death and destruction all round – should be liable to make compensation to anyone who is killed or injured in consequence of the use of it. There should be liability without proof of fault. To require an injured person to prove fault results in the gravest injustice to many innocent persons who have not the wherewithal to prove it”

More recently, the UK Transport Minister has stated:

“In road traffic personal injury cases in the UK, the burden of proof is on the victim to prove the other party is negligent. The injured party in a crash between a motor vehicle and a pedestrian or cyclist is most likely to be the vulnerable road user. Under strict liability, the burden of proof is reversed. Vulnerable victims, not drivers, are the ones assumed innocent with regard to causing their injuries. It is up to the driver to prove the pedestrian or cyclist was negligent. Strict liability only applies to civil compensation and does not affect criminal prosecution.

The law often uses strict liability in situations where there is likely to be an imbalance in terms of responsibility and where there is an inherent danger. Strict liability is already in use in English law, including workplace health and safety incidents and product liability.

Many countries in Europe apply strict liability to vulnerable road victims, e.g. pedestrians, children and cyclists. To vary[ing] degrees, these are applied in Austria, Denmark, France, Germany, Italy Netherlands and Sweden.

The road safety argument for strict liability is that it has the psychological effect of making drivers more aware of the vulnerability of children, cyclists and pedestrians. In support of this argument, many of those countries with strict liability have much better cycle and pedestrian safety in terms of fatalities per billion kms walked/cycled. The fatality rate for the most vulnerable group of child cyclists (10-14 year old), which represent a group of road users who potentially would benefit most from strict liability, may be 5 times worse in UK than Netherlands and Sweden according to one European study. Another report on child road safety attributed some of this difference to the law of strict liability³⁹.

The Welsh Government should seek devolution of the powers to implement presumed liability in Wales.

Option 6 – Daytime running lights

Another option with a strong Nordic track record⁴⁰ is the use of daytime running lights (DRL) (lights being switched on whenever a vehicle is in motion). Although the European Commission has required all new vehicles to be automatically fitted with DRL since February 2011⁴¹, it still leaves a large proportion of vehicles without this additional safety benefit. Even taking into consideration the fact that vehicles without

³⁹ Norman Baker MP, January 2011, quoted in [Strict liability](#)

⁴⁰ TNO Human Factors, October 2003, [Daytime running lights: Deliverable 3: Final report](#), p.3

⁴¹ European Commission, February 2011, [New cars equipped with daytime running lights as of today](#)

DRL will form a slowly decreasing proportion of the overall total, it would be worth Wales legislating to require the use of dipped headlights or DRL in order to obtain safety benefits right across the spread of road users, including for pedestrians and cyclists.

DRL substantially increases the visibility of vehicles for all road users. A meta-analysis of accident data concluded that not only are car crashes reduced (by 5-15%)⁴², but “It is likely that DRL has a favourable effect on accidents involving pedestrians, cyclists or motorcyclists”⁴³. Given the road safety benefits, and the improvement on walking and cycling rates that could result, we consider this intervention worth the roughly 1% additional fuel used⁴⁴ (and therefore emissions generated) for those vehicles not fitted with DRL as standard.

This is therefore an additional policy/legislative tool that could increase the uptake of cycling and walking as a result of reducing the fear of traffic.

Option 7 - Increasing the proportion of the Welsh Government transport budget spent on active travel

The proportion of the transport budget spent on active travel should be apportioned commensurate with the challenge of carrying out a “cultural change”. Given the relative lack of finance historically targeted on active travel over a period of decades, Friends of the Earth Cymru would like to see 20% of the transport budget being spent on active travel measures.

This level of investment would start to redress the balance of historically low investment in measures which provide economic, environmental, social and health benefits. It would also bring substantial benefits to both the economic fortunes of Wales (reduced reliance on imported oil, improved health etc.) and the Welsh Government’s climate change targets to reduce emissions by 3% year on year from 2011.

Using the example of the 2012-13 final transport budget⁴⁵ of approximately £652 million, that would provide active travel-specific expenditure of about £130 million.

We understand that there are limitations on how the Welsh Government can allocate the transport budget because of Treasury requirements. Capital expenditure (largely road schemes) benefits from this arrangement to the detriment of sustainable transport schemes. We urge the Welsh Government to request the power to determine transport budget ratios so that transport budgets in Wales can be set in a manner appropriate to the needs of the people of Wales.

⁴² TNO Human Factors, October 2003, [Daytime running lights: Deliverable 3: Final report](#), p.5

⁴³ Ibid, p.6

⁴⁴ Ibid, p.7

⁴⁵ Welsh Government, November 2011, [Final budget](#)

Option 8 – Provision of paths with all new road developments

New road developments should have the addition of suitable cycle and pedestrian provision as standard. Exceptions should be rare and only where – for example, with country lanes – traffic volume and speed are both very low.

Inclusion of cycle and pedestrian provision at the time of road construction substantially reduces the cost of provision *vis a vis* constructing such provision on a separate occasion, as the consultation document recognises.

Option 9 – Strong guidance in support of Workplace Parking Levies

The workplace parking levy was introduced through the *Transport Act 2000*. It allows local authorities to develop a licensing scheme that charges for the number of workplace parking places at a business premises. The purpose of the scheme must be to facilitate the achievement of local transport policies. Nottingham has started charging for its scheme since 1 April 2012⁴⁶, and Bristol has recently started consulting⁴⁷ on its planned introduction of the scheme.

The Welsh Government could require all local authorities in Wales to consider whether or not workplace parking levies should apply in their areas, with a predisposition in favour of such schemes unless there are compelling reasons (such as very little peak congestion) to determine against. The introduction of Workplace Parking Levies would re-route finance directly to sustainable and active travel budgets locally which could be used to help encourage more walking and cycling.

⁴⁶ My Nottinham, 2011, [What is a Workplace Parking Levy?](#)

⁴⁷ This is Bristol, 10 March 2012, [Bristol businesses facing workplace parking levy](#)