

Journey to Net Zero – Consultation Response by the Federation of Bath Residents’ Associations (FoBRA)

FoBRA is an umbrella organisation for local Residents’ Associations, with over thirty member Associations, representing between them several thousand Bath residents.

There is quite widespread acceptance amongst residents of Bath that there is an urgent need to reduce fossil fuel use, especially as we are now beset by a fuel crisis, and that this includes a need to change travel behaviours, particularly reducing car use. The necessary far-reaching changes will only be achieved if all carry their fair share of the burden.

Overview:

- There are significant gaps in the proposals, and we believe the proposals would benefit from a clearer definition of what the objectives are and how success would be evaluated, as well as clearer prioritisation of measures to secure easier gains more quickly.
- With a key yardstick being the Council’s target for achieving carbon neutrality in 2030, just eight years away, many of the measures proposed in the Journey to Net Zero document to reduce carbon appear insufficiently ambitious, are insufficiently urgent or lack the level of plausibility needed to achieve the necessary progress towards net zero by 2030.
- Logically the biggest investment and measures for reducing traffic into and out of Bath should be targeted principally at the corridors where the currently available options for those driving into Bath are the worst, and yet the opposite is proposed.
- Significant proposals appear inconsistent with other adopted or developing transport-related policies around B&NES endeavours to address the Climate Emergency and reduce carbon.
- Without substantial reduction in traffic into and across the city, closing main roads in the City Centre should be unthinkable due to the inevitable displacement into neighbouring residential roads.

More specifically:

Coordination of planning and transport policies: In our view there is insufficient coordination with other Transport-related Policies, including much of the sustainable transport content of the recently published Local Plan Partial Update (LPPU), the interface between transport policy and development, and especially the adopted Liveable Neighbourhoods policies. We advocate better coordination, with a view to more effective and quicker increase in sustainability in travel mode choices. By way of example, in the East there is no proposal for corridor improvement, and yet the LPPU allows villages to the East more generous parking allowances, the aspiration for a park & ride was removed from the LPPU without provision for any other equivalent scale of traffic interception, and the current Active Travel investments do not include plans for London Road improvement to enable safe cycling and walking along this route made perilous by HGV through-traffic. Some of the proposals in the Journey to Net Zero plan are directly contrary to the adopted LTN Strategy. The absence of clear definitions of “city centre”, “central Bath”, “historic core” renders many parts of the proposals vague and ambiguous, and clear definitions are needed. In the development of the CAZ, extensive consideration of traffic flows and modelling was undertaken resulting in a boundary determined with minimising displacement in mind. It is suggested the CAZ boundary could provide a better-defined, clearer area in which to focus on traffic flows, reducing potential conflict with CAZ

objectives as well as benefitting from the sophisticated CAZ ANPR infrastructure to support, evaluate and monitor impact of changes.

Carbon reduction as a condition not an incidental: Without a substantial reduction in overall traffic across Bath, the aspiration of City Centre Traffic Cells (Project 5 in Section 4) is unworkable and cannot reasonably be considered. The primary objective of the proposals should be to introduce robust and effective measures to reduce carbon. **The aspiration of further City Centre road closures should be considered only if and when robust carbon reduction targets are being met.** Without overall reduction in traffic across Bath, closure of further roads in the City Centre will result in displacement into neighbouring residential areas (contrary to the Liveable Neighbourhoods policies and LTN Strategy) and onto roads past schools (counter to the objectives of the CAZ which was carefully designed and modelled to ensure protection for residential areas and for schools on busy roads such as St Andrews and Widcombe). These adverse impacts for substantial numbers of Bath residents would be unacceptable, and would be avoidable only by greater and more urgent focus on genuinely effective carbon reduction measures. Our belief that such traffic will be displaced, and not “evaporate” is not hypothetical but is clearly foreseeable from the CAZ modelling that was done for the Queen Square traffic management scheme, which showed substantial displacement would result. Experience of adoption of the scheme confirmed this modelling prediction to be completely justified. Further closures of City Centre main roads, as apparently envisaged in the City Centre Traffic Cell project, should be conditional on substantial reduction of overall traffic to avoid such displacement. Whilst the obviously busiest routes across the City Centre include the city centre stretch of the A4 and Green Park Road, consideration also needs to be given to the significant traffic flows that use routes through the existing bus gates before 10am, carrying eg much school run traffic from the south/south-east of the City via Broad Street. If residential areas around the City Centre are to be protected by LTN measures these would clearly need to be implemented before any city centre main roads are closed, to avoid displacement into residential roads.

Through-traffic: Through-traffic (ie traffic journeys that neither start nor end within Bath) on the key routes East/West and, especially, North/South seem to have been overlooked in the plan for City Centre Traffic Cells. With no plan for any ring road or bypass, how would this traffic be re-routed without being displaced into residential areas around the City Centre? Again, if residential areas around the City Centre are to be protected by LTN measures these would clearly need to be implemented before any city centre main roads are closed.

Heritage: There is no good heritage argument that justifies closing main roads in the City Centre including Queen Square if this will result in displacement onto roads in neighbouring residential areas. The CAZ modelling done for the Queen Square traffic management scheme to support the switch from originally proposed Class D to Class C showed substantial displacement would result, and experience of adoption of the scheme confirmed this prediction to be justified, whilst roads to which traffic is displaced are in some cases of equal or even higher heritage status compared to Queen Square. Further closures of City Centre main roads, as apparently envisaged in the City Centre Traffic Cell project should be conditional on substantial reduction of overall traffic to avoid such displacement.

Addressing principal traffic sources in Bath: The proposals contain no specific measures to address traffic to intensive traffic-generating sites within the city, notably the Universities, the RUH and Bath Rugby. It appears these sources of traffic starting and/or ending their journey in Bath are overlooked in the plan, but these sites are known to generate substantial proportions of cross-city traffic. For example:

- the RUH being responsible for large amounts of cross-city traffic originating in Wiltshire and travelling East/West or from rural areas South of Bath;
- Bath University generating large amounts of commuter traffic in the East of the city, notably high proportions of traffic at busy times on the congested route across the river at Cleveland Bridge.

With provisions for development at these sites already supported in the LPPU, it is a defect that there is neither any plan in the Journey to Net Zero plan to address their current intensive traffic generation, nor (in the LPPU) stricter limits on parking in any future development plans. We would welcome a Workplace Parking Levy in the sense of a levy on harm done, but there is a need for greater recognition amongst the owners/developers of these sites that the levels of land earmarked for parking in their development plans are unsustainable and incompatible with their responsibilities as key stakeholders in the city. Substantial reductions in car parking would have the extra advantage of freeing up more space for other better uses (for example campus student accommodation in the case of the Universities).

Substantial reductions in cross-city traffic generated by these centres are essential in order to relieve congestion and pollution, and there is a need for greater coherency between the current proposals, the LPPU and other developing policies to reduce traffic associated with these sites. With much of the traffic to these sites coming from outside B&NES, and without genuine and effective measures by the organisations managing these sites, the burden of carbon reduction targets falling on B&NES residents will be disproportionately high. A fairer distribution of the burden should be the aim.

Park & Ride sites: We would like to see proposed improvements to be adopted with greater urgency where feasible, e.g. direct buses to the RUH, University etc, in order to support users of those sites in switching to P&R. The need for longer hours, cheaper fares and greater bus frequency at busy times is also urgent, as without such changes it is hard to see how Park & Ride services can make a stronger contribution to traffic reduction.

School run: School run traffic has been persistently cited as being a major contributor to cross-city traffic, with much of it crossing the centre of the city. Work to date seems to have been limited to desk-based work on Travel Plans, whilst the effective measures to reduce school traffic are defined only as medium- to long-term. The problem with the school run has not been Travel Plans (which are fairly easy) so much as implementing them: what is now to be done to make them a reality, and soon? This work should be much more urgent. Has consideration been given to securing earlier gains by means of encouraging grassroots communities of parents and/or young people with interest in climate campaigning to engage in generating shorter-term initiatives such as co-operatively organised buses, 'walking buses' or school streets?

Destination traffic into Bath: In determining which of the main radial corridors into the city to prioritise for corridor improvement, obviously those corridors with the least or worst available alternatives should be given highest priority. It seems incongruous that corridor improvements are concentrated in the South and West, where there are good alternatives available already to drivers especially along A4 corridor, and including park & ride facilities, whilst measures under consideration on the corridor with least available alternatives for drivers, into Bath from the A46, A4 and A36 in the East are minimal, with no park & ride, and the only clear proposal being a small-scale express bus service. As described, this bus service would make negligible impact on the large influx of traffic (including 7000 commuter vehicles, with other vehicle category numbers unspecified) being driven in from the East daily. Whilst it is understood that there could be a long-term plan to look at opening a station in Corsham this is not foreseeable on the timescale on which substantial carbon

reduction is needed. Whilst improvements to increase use of Park & Ride sites is welcomed, there consideration should also be given to a clearer strategy of reduction of car park spaces within central parts of the city.

Freight consolidation/Last-mile delivery: We strongly support such measures where they reduce ingress of vehicles into the city but it is not immediately clear how this would work for deliveries arriving from the East where there is currently no Park & Ride to locate such a service. This issue has acquired greater importance and urgency as a consequence of the sharp increase in home deliveries both before and during the pandemic, much of which demand seems likely to remain.

Public transport: In key corridors where WECA funding may be available, public transport improvements should be given the highest priority as being the most appropriate (and in most cases the only realistic) alternative to car use for the highest number of people. Essential improvements are greater frequency, longer operating hours of key services including park & ride services, and greater safety for vulnerable users. More flexible interfacing with other transport modes would be desirable, for example enabling cycles to be taken on buses.

Top of Town/Milsom Quarter Plans and Transparency: The proposals appear to involve substantial changes in the City Centre that are not adequately explained and that would clearly interact with a Top of Town Plan and a Milsom Quarter plan, although neither of those plans is disclosed either. This must not result in reduced opportunity for public scrutiny of those two plans, the Journey to Net Zero plan, and the interaction between all three of those.

Providing for travel by bike: Investment of scarce resources in cycle infrastructure should be prioritised on main connecting routes which can usefully serve the highest numbers of those travelling to work, school, university or other key destinations within Bath, rather than on routes which cannot be well-lit and/or will be perceived by users as isolated. The latter will be unattractive for use by, especially, girls and women for personal safety reasons, and should be considered as lower priority leisure routes for funding purposes. If there is a desire to enable cycling to/from key destinations in the city it would seem a priority to provide segregated cycle infrastructure on busy main roads, including the trunk network roads at London Road and Bathwick Street. There is scope for relatively simple and inexpensive improvements of the short routes between existing paths and nearby facilities such as schools.

Charging infrastructure: Due to the prevalence of apartments without access to off-street parking in many parts of the city we would like to see faster progress on provision of on-street charging for residents, especially in RPZs, since the absence of adequate provision for those living in the city will slow down the adoption of electric vehicles.

Data: It is disappointing that some of the data relied upon is so old whilst it is drawn from many different sources that are not always ideally compatible with each other. Ideally, the Council should be working towards using the up-to-date, highly granular, data from the ANPR system.

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