

## WEST OF ENGLAND JOINT TRANSPORT STUDY

### Transport Vision Summary Document November 2016 – comments by the Federation of Bath Residents' Associations (FoBRA)

#### General

1. We welcome this comprehensive and ambitious programme of transport improvements. We strongly support the aim of reducing reliance on the private car (page 2) and improving alternative modes of transport.
2. The Joint Transport Study looks at strategic transport issues across the WoE area as a whole. The Transport Vision must also recognise the complementary need for detailed transport plans for the individual urban areas to reduce congestion and air pollution in those areas. Bath has the Bath Transport Strategy which was approved in 2014, but this needs to be developed into a transport *plan* with detailed and specific measures including timescales and budgets for their implementation. The Joint Transport Study should state an intention to do this.
3. Air quality is a major issue throughout Bath (and elsewhere). Nitrogen dioxide levels along most of the main road network in the city including the radial routes into the city are well above the legal limit. Along London Road and parts of the centre pollution levels are 50% over the limit. Pollution has remained at these high levels for more than ten years and is not reducing. These levels of air pollution represent a serious long-term threat to the health and well-being of people who live and work in Bath. There should be a serious emphasis on air quality in the Transport Vision, since the measures needed to reach acceptable air quality standards will have a significant impact on both the strategy and the priorities for investment.
4. The point is made at page 5 that restrictions on general traffic movement can be challenging to deliver. However they have proved successful in cities as different as London, Cambridge and Leicester. They are critical in the case of Bath, if the plans for the city centre in the Public Realm and Movement Strategy (PRMS) are to be realised. The PRMS Pattern Book published last year provides many examples of beautiful spaces in other cities. It also includes a number of 'concept designs' for spaces in Bath city centre. These designs are splendid, but they do all depend on removing the traffic that currently fills these spaces.
5. Driverless cars (page 5) could become a significant factor during the period of this plan. We suggest that University resources in the WoE might be harnessed for a study of their likely developments and impacts.
6. We very much welcome the inclusion within the programme of extra P&R in Bath and an A36-A46 link road (page 7). However, the A36-A46 route is not specifically mentioned in the discussion of strategic routes at page 11. Removal of the A36-A46 through traffic is key to reducing congestion and air pollution throughout the city, and should be explicitly included within the programme.
7. Page 14 sets out the funding requirement for the transport package. Does this include funding for Bath P&R expansion and the A36-A46 link?
8. Our comments on the specific questions posed in the consultation are as follows:

**Q1. Is the level of ambition for the Transport Vision about right?** Yes. The scale of the already existing transport and air pollution problems, which will only worsen with the anticipated development in the area, calls for an ambitious programme to reduce reliance on the private car and improve the alternatives including public transport. The Vision however lacks an emphasis on partnership with neighbouring authorities: west Wiltshire looks to Bath for many services, and there is (see below) a need to improve road access between Bath and the M5 southbound: the Vision should aim at a step change in WoE collaboration with Somerset and Wiltshire.

**Q2. Do you think we are proposing the right mix of public transport investment (bus, rapid transit, park and ride and train)?** On the whole, yes. However, providing better alternatives to the private car is a necessary but not sufficient condition for reducing the use of cars in Bath and other urban centres. Travel demand management, including traffic management measures, more residents' parking, workplace parking levies, congestion charging, or a reduction in parking levels is essential to discourage private cars and goods vehicles from entering the city. These should be included in the local transport plans, and the Transport Vision should include reference to demand management measures.

**Q3. To what extent do you agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes?** Strongly agree. Non-local (through) traffic should be removed from residential streets and urban centres wherever possible. We want to see through traffic removed from the centre of Bath, and longer distance through traffic removed from the city as a whole (eg the A36-A46 link).

**Q4. To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors?** Agree, subject to proper consideration of environmental and other impacts. However, the transfer of movement from private motor vehicles to an LRT is likely to lead to substantial environmental improvements overall. We particularly welcome the potential for rail connections from Bath to Bristol Airport either by heavy rail or LRT, but there should be through services to Bath via Bristol, and not to Bristol alone.

**Q5. To what extent do you agree with using financial incentives and financial demand management at a local level to raise funds to help pay for the transport vision?**

Charging for visitor parking, congestion charging and workplace parking levies should all be considered to manage demand and raise funds. Congestion charging potentially offers an efficient, powerful and fair way to tackle congestion: charges should be modulated to favour local taxpayers over tourists, and in particular to discourage through routing by HGVs. Congestion charging (and a clean air zone) in the city centre should be considered as part of an overall traffic management plan to ensure that HGV and PSV traffic is not simply displaced onto nearby residential roads.

**Q6. What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre?** A new motorway link from the M4 to Emerson's Green (J18A) could relieve pressure on the very busy Junction 18 access to Bath, as well as helping local access. The stretch of motorway between a potential M4 J18A and J20 is already often at capacity, and in research terms the jury is still out on the

variable speed limits now instituted: other solutions should be examined here such as additional lanes or a parallel toll road.

**Q7. Do you agree with the following elements of the package?**

- **Marketing and education to change travel behaviour.** Yes
- **Area packages of improvements for pedestrians, cyclists and buses.** Yes. More attention should be paid to off-road urban footpaths, both in new developments and where 19<sup>th</sup> Century paths need to be protected.
- **Strategic Cycle Routes - new or upgraded routes.** Yes
- **Park & Ride - new or expanded sites.** Yes. Bath needs a Park & Ride to the east of the city, and possibly one on the A36 to intercept traffic from the south-east. City centre car parking capacity should be reduced in parallel with increasing Park & Ride on the periphery. Opening hours of Park and Ride facilities need to be kept under constant review. P&Rs should operate later into the evening and have secure overnight parking, so they can be used by evening and overnight visitors.
- **Bus network improvements.** Yes. However, only if the WoE authorities take regulatory control over regional bus services (including particularly those in Bath and Bristol) can we hope to achieve coherent network design, with routes, frequencies and speeds that make buses competitive with cars and appealing to passengers. We hope that the recently agreed devolution deal will pave the way for this.
- **Expansion of the MetroBus network.** Agree
- **Light Rail routes.** Yes
- **Rail improvements – improvements to existing services and facilities.** Yes
- **New railway stations.** Yes. New stations at Corsham and Saltford could encourage people to use rail instead of cars for access to Bath.
- **Road improvements, including junction improvements & addressing bottlenecks.** Yes. A36 Lower Bristol Road is the designated east-west through route for Bath and requires improvement, particularly if through traffic in Bath city centre is restricted as we would wish. This is especially important with the development of the Bath Riverside/ Enterprise Area, which currently is proceeding without a related transport plan. A master plan for the A36/Lower Bristol Road is urgently required. Travel between Bath and the M5 southbound is laborious by any route at present, and consideration should be given in collaboration with Somerset to a route improvement plan.
- **New road connections.** Yes. The most critical for Bath is to provide an alternative route for the traffic, much of it HGVs, which currently uses the A36-A46 route through the city. The traffic congestion and associated air pollution needs to be removed from this route, but this is also vital for reducing traffic in the city as a whole, as the A36-A46 congestion impacts movement throughout Bath.

- **Freight management including consolidation centres.** We support the expansion of freight consolidation. We suggest that a local system for Bath on the lines of the system being used in Gothenburg is considered, as well as expansion of the present lorry system operating out of Avonmouth. See article:

<https://www.theguardian.com/cities/2015/nov/18/innovative-delivery-system-transforming-göthenburg-roads>

The implications of increasing deliveries for internet purchases should also be addressed.

**Q8. Are there any other schemes you would like to see in the package? Yes:**

- Clean Air Zones
- Time windows for freight delivery
- Expanded use of the A420 as an alternative route between the east of Bath and Bristol. From the east of Bath, the distance to Bristol is almost exactly the same by the A420 as through the city of Bath. The A420 is relatively under-used, and there is much less housing on the A420 than on the route through Bath and Salford. But it is not even signposted on the east of Bath as an alternative route to Bristol (eg "Bristol avoiding Bath").

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