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ATKINS
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CIVITAS RENAISSANCE– BATH FREIGHT MANAGEMENT CONSULTATION

You invited us to let you have our considered views following the consultation event on freight management on 6 January.

Traffic and the associated air pollution is the top concern of FOBRA members, and we are very pleased to see that this aspect of traffic and pollution in Bath is being addressed, and to learn of the thorough study that Atkins is making of the subject.

According to the Bath Air Quality Action Plan consultation draft, road traffic is the cause of nearly all (over 90%) of the air pollution in the city, and Heavy Duty vehicles (HDV) are contributing at least 50% of the total NOx contribution although they are only between 2 and 7% of the vehicle flows. We are also concerned about diesel particulates, of which goods vehicles are the major source. Goods vehicles must be contributing a very high percentage of the total air pollution in Bath.

Noise and vibration from HGV must be having a damaging effect on the fragile Georgian buildings, particularly where vaults run under the roads.

Bath is overrun with motor vehicles of all types. What would be an unsatisfactory situation in any city is an absurdity in a World Heritage City which depends heavily on tourism. The visual intrusion of HGV is particularly serious due to their size.

Goods vehicles contribute significantly to road congestion in general and also cause problems in specific areas. It is wrong to conclude that they need not be restricted because they are in the minority - all vehicles need to be restricted. We return to this point later.

Your data shows that there is a large amount of goods traffic that uses the centre of Bath purely as a through route. This brings no benefit to the city and the study should consider how this traffic can be prevented from coming through the city. Atkins also confirmed our perception that there is a significant number of HGV passing through the city centre in breach of the 3.5 tonne weight limit, and that enforcement of the relevant TROs is inadequate.

In response to your questionnaire, our comments are as follows:

Q1. The reduction of goods vehicle movements in Bath city centre is therefore a serious issue (5).

Q2. We consider that the introduction of an Urban Freight Consolidation Centre for Bath would be beneficial, as it would reduce the number of vehicle movements, reduce congestion and provide benefits to businesses when the system has settled down. It would however tackle only part of the overall problem of the impact of goods vehicles on the city.

Q3. The issues in order of priority to us are:

1. Air pollution
2. Congestion
3. Noise and vibration
4. Visual intrusion
5. Servicing arrangements and TROs
6. Reducing CO₂
7. Safety

By way of explanation, road safety is a very important issue for residents, particularly for cyclists and pedestrians, but as we understand it there is only a small number of accidents involving goods vehicles in the city. The main problem with TROs is lack of enforcement. Servicing arrangements at present are completely unregulated and could be greatly improved.

Q4. Removal of through traffic; enforcement of TROs, present and future. Before addressing possible solutions, we would like to draw attention to a number of specific areas which suffer from problems caused by goods vehicles.

a. Most of the road network through the city has been declared an Air Quality Management Area due to levels of nitrogen dioxide over the safe health limit set by the World health Organisation, the European Union, and the UK Government in the Environment Act 1995. B&NES information shows that the majority of this pollution is caused by HGV and other goods vehicles. We therefore welcome the proposed area for implementation of measures to include the commercial and heritage core of the city.

b. Much of the congestion in the city centre is caused by vehicles that do not even enter the city centre study area. Heavy congestion along the London Road/Bathwick Street route which links the A46 and A36 causes eastbound traffic trying to leave the city centre to back up into the city. Tailbacks can reach as far back as Queen Square. Most of the vehicles in the tailback are not goods vehicles, but much of the congestion on London Road is due to goods vehicles. The Bristol/Bath to South Coast Study demonstrated that this congestion would be very significantly reduced if heavy goods vehicles were removed from this route.

c. George Street, in the heart of the Georgian city, is a major choke point. The road is narrow and there are goods vehicles parked and making deliveries throughout the day. Goods vehicles are often parked on both sides of the road, creating a chicane that delays traffic further. Westbound traffic frequently backs up along the Paragon and eastbound traffic backs up into Queen Square (both Grade 1 setpieces of Georgian architecture). HGV often have difficulty negotiating the George Street/Gay Street corner, which adds to the chaos.

d. There is a constant problem of goods vehicles parking on the pavement, apparently in the belief that it is more important to keep the carriageway clear than the footway. This has created a serious problem of broken paving slabs, a trip hazard for pedestrians and an expensive item for highway maintenance. If guidance is to be provided to drivers and businesses about HGV restrictions, this should cover pavement parking.

Q5. We comment on these measures in broad order of priority:

1. Variable charging scheme for Cleveland Bridge. FOBRA would like to see a complete HGV ban on Cleveland Bridge. That would substantially reduce congestion along the London Road/Bathwick Street route and this would allow traffic to flow more freely out of the city, thus reducing congestion in the city centre. If a complete HGV ban is not considered feasible at the present time, we would strongly support a variable charging scheme to encourage traffic to use alternative routes. That would however be counterproductive if traffic used the city centre instead, so would need to be accompanied by measures to prevent this, and rigorous enforcement.

2. Traffic management measures to restrict goods vehicle access. We would welcome traffic management measures to remove from the city centre all goods vehicle that have no business there, ie measures to remove through traffic. Time- or permit-based systems using rising bollards (as used in Cambridge) should be considered to control access for deliveries in the very centre of the city.

3. Refresh signing strategy and enforce TROs. The present TROs are not logical, eg restrictions on London Street and George Street, but not on Queen Square or the Paragon. This makes them difficult to understand and enforce. They should be made more logical. We also consider that rigorous enforcement is essential. If the police do not have the resources, the Council should take over responsibility for enforcement using existing well-proven ANPR systems and any appropriate new technology. An immediate start should be made on enforcing existing HGV weight limits in the city.

4. Time restrictions/permits/charges/management system. We are in favour of managing delivery times, as this will reduce congestion, but we have no preference in principle between the various systems; these should be applied as seems most appropriate to individual problem areas. In our view some of those meriting early attention are:

a. George Street, where delivery vehicles have a disproportionate impact on congestion over a wide area. Deliveries to businesses in George Street should be severely constrained by means of time restrictions and/or delivery management systems.

b. Milsom Street, which as one of the principal pedestrian thoroughfares for residents and visitors should be kept as free of traffic as possible. Most traffic other than vehicles making deliveries simply make a loop down Milsom Street and back up Broad Street, which as a result has some of the highest levels of air pollution in the city. We see no reason for anything but vehicles making deliveries and PSV to use Milsom Street.

c. Westgate Street, which is often badly congested with goods vehicles making it an unpleasant place for pedestrians.

*Yours sincerely
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