

FoBRA comments on Low Traffic Neighbourhood Strategy paper V6

1. We support the concept of LTNs, and the processes proposed for their development seem reasonable. However the paper currently fails to address the critical issue of the cumulative impact of LTNs on traffic movement in the city.
2. An action is identified at page 69 "to develop a framework to identify potential areas which may be suitable for a low traffic neighbourhood, including establishing the main and local road networks, as well as key public transport and active travel routes", but the principal purpose appears to be to assist the definition of LTN boundaries, rather than analyse traffic movements.
3. It is inevitable that LTNs will displace traffic onto the designated road network, and the only way to avoid increases in traffic levels there will be to reduce the overall volume of traffic entering and passing through the city. Our paper suggested some ways of doing this.
4. It is essential to identify the main and local road networks and analyse the pattern of traffic movement resulting from the introduction of LTNs. The design of the road network should be undertaken with clear objectives in mind, bearing in mind that all the main routes in Bath are also residential streets. We propose two key objectives:

a. LTNs should not lead to increases in traffic on any road in the city.

This is on the basis that no residential area should be disadvantaged by the introduction of an LTN in another area; or as stated on page 31: "Low traffic neighbourhoods are not about rewarding one group of people while punishing another."

The avoidance of traffic increases is also essential to ensure the success of the Clean Air Plan (CAP). As stated at page 31: "Given that a CAZ will be implemented in the city centre and AQMAs have been declared across B&NES, it must be ensured that measures will not have a negative impact of the clean air plans and air quality compliance in the long term."

The experience of Waltham Forest cannot be directly read across to the very different situation in Bath, as Clyde Loakes made clear in his presentation at the seminar in January. However, increases of up to 28% were experienced on Waltham Forest boundary roads. Increases of this order in on main roads in Bath that are often densely residential, are not designed for traffic, and have some of the worst air quality in the city, would have a major adverse impact. Such impacts cannot be dismissed as "not noticeable" and "not problematic".

b. The city centre should be treated as an LTN in its own right.

Central Bath is an important residential area in its own right, in fact the most densely residential part of the city, with streets that are totally unsuited to the heavy traffic that they currently suffer. The paper makes frequent references to policies which call for traffic reduction in the centre, for example:

page 51 "Linking with the policy objectives of the Getting Around Bath Transport Strategy and existing local, regional and national strategies, low traffic neighbourhoods have the potential to reduce the impact of vehicles and promote more sustainable modes of travel." The Bath Transport Strategy Vision statement is that Bath will enhance its unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, *particularly in the historic core.*

page 51 "The B&NES Public Realm and Movement Strategy outlines the vision for a bold and innovative approach." The PRMS puts forward a series of measures to address *traffic movement within and around the centre of the city* in order to establish a network of beautiful new and reclaimed public spaces [and] successful streets.

page 55 "As highlighted in the Public Realm and Movement Strategy, "over the past century, the increasing dominance of the motor car has done much to damage the character and quality of public space and public life across the world". This has had particular impact within Bath as a World Heritage Site as the dominance of the car in the city has resulted in the decline of the public realm and the erosion of "its sense of order, coherence, clarity of design and quality". *The traffic dominance within Bath, intertwined with other constraints, have resulted in the city centre and central neighbourhoods being designed around the prioritisation of the motor vehicle.* Pedestrian, cycling and public transport provisions have been constrained, with movements using these modes often constricted. As such, the attractiveness of travelling via these modes has not been acknowledged or enhanced, which reinforces habits for travelling via private car. The Public Realm and Movement Strategy highlights that this contributes to high levels of air pollution, stress for pedestrians, cyclists and drivers, as well as pedestrians using a limited number of overly crowded routes."

page 57 "Rat-running traffic is one of the main issues reported to the Council by local residents, *particularly within Bath city centre.*"

5. LTNs should be introduced in conjunction with an overall traffic movement plan, which includes modelling the impact of LTNs (such as was done for the relatively minor changes at Queen Square in connection with the CAP). Introducing LTNs without such assessment would be very likely to jeopardise the success of the Clean Air Plan. Far better to anticipate and plan for the impact of LTNs.

6. Monitoring of traffic volumes and air pollution levels following the introduction of LTNs will be vital to assess their impact. It would be insufficient to rely on the city's existing monitoring arrangements, as was hinted in the webinar of 27 July. Some stretches of the designated main road system are well covered by static sensors (diffuser tubes) but others are not. Static sensors also do not provide time-dependent data, so will mask problems at particular times of day eg when children walking to school. However, monitoring would be entirely retrospective and if LTNs do result in NO₂ exceedances it will be very difficult to recover from this situation; and meanwhile B&NES will face fines for non-compliance.

7. Several FoBRA member residents' associations are already promoting LTNs in their own areas (eg Camden, Widcombe, Lansdown Crescent, Circus Area, Bear Flat, Entry Hill, Vineyards).

8. Page 58 refers to a Transport Delivery Action Plan for Bath. This appears to be an important document. In the interests of transparency, please can it be made public?

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