

To the Liveable Neighbourhoods consultation team:

The response by the Federation of Bath Residents' Associations (FoBRA) to the Liveable Neighbourhoods (LN) Strategy consultation is attached.

This was originally a paper advising FoBRA members (33 individual Bath residents' associations, with a combined membership of some 5,000 residents of the city) on the LN Strategy. FoBRA members agreed that the paper taken as a whole sets out the principles that we believe B&NES Council should follow in implementing the Strategy.

Individual FoBRA member associations will be responding to the consultation separately.

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Attachment

### **B&NES Liveable Neighbourhoods strategy consultation**

1. B&NES Council is consulting on its strategy to introduce Liveable Neighbourhoods in Bath. There are three elements, the main one of which is to start developing 'Low Traffic Neighbourhoods' (LTNs). There are also related strategies for residents' parking zones and charging points for electric cars.
2. There are many potential benefits for residents from LTNs including quieter roads, clean air and increased safety. All these are things we've wanted for many years. The Council now is seeking to understand the strength of local opinion on the proposal and all residents' views are being sought. The Council's consultation website can be found at: <https://beta.bathnes.gov.uk/liveable-neighbourhoods-consultation> . This includes a 20 page summary 'brochure' which your residents are recommended to read. There are also links to the three full strategy papers and the related consultation survey. RAs and individuals are urged to complete the survey, as this is an important issue for all of us. Each Association will have its own interests and concerns relating to its own particular circumstances; this note is intended to provide advice to assist with formulating their responses. The consultation is open until 14 October.
3. Most of the public realm in Bath is currently given over to motor vehicles. The space that is left for pedestrians and cyclists is narrow, often obstructed, and uncomfortably close to speeding traffic. Many residents are tired of the through traffic, congestion, noise, and pollution. They fear speeding drivers and mourn the degradation of the residential community environment. Over the years several measures have been introduced in Bath to discourage and slow down motor traffic: speed bumps, narrowing of the road with parking spaces, residents parking schemes, a 20mph limit – which is ignored by many drivers. These have helped, but not enough. A new, wider, approach is needed.
4. An LTN allows local residential traffic to move in, out and around the neighbourhood, but prevents through traffic. This is normally achieved by introducing a 'modal filter' on the primary through road in the neighbourhood, with complementary control measures also being introduced on adjoining streets to ensure a coherent, joined up solution that delivers an

overall reduction in traffic volumes across a whole area. A modal filter can take a number of forms but the most flexible is a 'bus gate' - of which we have two examples in the city (a partially closed one at the Podium, and continually closed one at Pulteney Bridge). A bus gate allows buses to pass through it, and also emergency vehicles, Council service vehicles, pedestrians and cycles - sometimes taxis too. The modal filter may also take the form of a simple, hard stop like a bollard, such as at the west end of the Royal Crescent. When associated measures are included on adjoining streets, the result is a significant reduction in traffic volumes across the whole neighbourhood.

5. LTNs usually incorporate other measures. Traffic calming might involve, for instance, more reminders about the 20mph speed limit, or raised areas at junctions to reduce speeds and cater better for pedestrians wanting to cross over. Improving the public realm might see more seating at key points, on-street cycle storage, more planting and growing areas.

6. A potential downside for residents within an LTN is that they too will be subject to the filter so, although they would still be able to drive around most of the neighbourhood as before, they would not be able to drive through the filter. So, depending on where they are and where they want to go, they may need to choose a different route. Anyone will still be able to walk, cycle and use any bus service running through their neighbourhood. With less traffic, it will be a more pleasant, safer experience for active travellers and bus passengers.

7. There is the danger of an unintended consequence for some of the outer neighbourhoods which have unrestricted parking. These are likely to attract drivers wishing to park and drop down into the city centre. This already happens in the evenings in some neighbourhoods after the restrictions end and the night economy commences and on Sundays too. Such an effect often coincides with 'peak residential parking', and could be exacerbated by LTNs. This, along with other potential disadvantages, is recognised in the Residential Parking strategy document. Hence it is that both strategies being considered together.

8. The advantages of LTNs to residents living within them seem clear, although a lively debate may be expected in each area as people grapple with the restraints on the freedom they currently enjoy to use their cars as they please. Local communities will be expected to work with their Ward Councillors to develop proposals for LTNs in their areas. The challenge for local communities which do want to pursue an LTN will be to find the time and resource to work closely with their Councillors on the detail of their design and implementation.

9. It is important to recognise that LTNs also have potential negative impacts. LTNs have been controversial in parts of London and elsewhere. These issues should be addressed frankly and honestly from the outset. The basic problem in Bath is that the main traffic routes are also, to a lesser or greater degree, residential streets that are already carrying excessive levels of traffic. Some have some of the worst air quality in the city. LTNs could have the effect of displacing traffic from one residential area to another.

10. Experience elsewhere indicates that a proportion of displaced traffic 'evaporates' over time as a result of 'modal shift' - as people rethink their journeys and switch from cars to other forms of transport such as buses, walking and bikes. Studies indicate that traffic evaporation may reduce total traffic volumes by up to 11%. Recent surveys show that around half of all car journeys in Bath are less than two miles in distance, some of which could be converted into active travel (walking, cycling, scooting, for example). It can become a

virtuous circle; as traffic levels fall, other means of getting around become easier and more attractive. The Council cites the experience in the London Borough of Waltham Forest, which saw traffic increases of 4% to 28% on boundary roads after the introduction of LTNs. It is difficult to compare what happened in Waltham Forest and other locations with the very different situation in Bath, where there are factors which are not present in London, such as poorer and higher-priced public transport services, a high density of school traffic in some areas, and steep hills around the centre which are a deterrent to cycling and a problem with heavy shopping. However, traffic increases of the order experienced at Waltham Forest would have a significant impact on roads in Bath.

11. Nobody knows how significant a factor traffic evaporation would be in Bath. An iterative approach would be safer than trying to apply LTNs across the city in one go. It would be helpful to carry out trials using Experimental TROs in carefully selected areas where an LTN would have a limited displacement effect. There are safeguards to these with strictly limited durations and the need to consult on the outcomes.

12. Avoiding negative impacts on the road system is likely to require the Council to reduce overall traffic volumes in the city, something which FoBRA has long called for. We suggested a number of possible measures in our paper 'A traffic management plan for Bath LTNs', including directing through traffic to alternative routes away from the city, a permanent weight limit at Cleveland Bridge, congestion charging, and increased parking controls. The particular issues of the central area, as an important destination for residents and visitors alike which is also densely residential, also need to be addressed. It is long standing Council policy to reduce traffic in the central area and secure major improvements in the public realm.

13. The two other components of the LN strategy are the provision of on-street charging points for electric vehicles (EVs), and resident parking zones (RPZs). It is clearly right for the Council to begin exploring EV charging point provision to pave the way for increased take-up of EVs, and we should support this. On RPZs, the Council proposes to conduct another review of parking strategy, this time in combination with the LTN strategy. This is likely to mean that more priority is likely to be given to residents, particularly in areas with limited off-street parking facilities, which is good. It may also lead to the creation of more RPZs.

14. The Transport Group did not consider that it would be appropriate to offer a draft FoBRA response to the consultation before hearing members' views at the Committee discussion on 8 October. A response might be based on the following main points:

- We warmly welcome the concept of introducing LTNs. As a matter of principle the LTN concept should be applied to all residential streets in the city including those which are currently treated as arterial roads.
- LTNs have the potential to be very divisive if they create winners and losers among residents. The potential negative impacts of any LTNs should be considered in advance and monitored after they are put in place, including the impact on air quality.
- We suggest conducting an early trial using Experimental TROs in a carefully selected area where an LTN would be likely to have a limited displacement effect.

- LTNs will displace traffic onto the designated road network, even if there is some traffic evaporation. The basic problem in Bath is that the main traffic routes are also to a lesser or greater degree residential streets that are already carrying excessive levels of traffic. Some have some of the worst air quality in the city. They should not be burdened with additional traffic. Traffic restraint should be applied to local distributor roads as well as within LTNs.
- Avoiding traffic increases on the main roads is essential to ensure the success of the Clean Air Plan. Compliance with the legal limits on air pollution is a necessary but not sufficient condition to ensure that LTNs do not unfairly impact on residents living on and close to the designated road network. Traffic could increase by a large amount, causing increased air pollution and a serious loss of amenity to residents, without breaching the legal limits on air quality.
- Consultation on the introduction of an LTN should include all communities which may be affected by the creation of an LTN, particularly those on the road networks onto which traffic could be displaced, and not limited to residents of the area of the prospective LTN.
- In order to avoid negative impacts on the road system, overall traffic volumes in the city need to be reduced. Possible measures might include directing through traffic to alternative routes, a permanent weight limit at Cleveland Bridge, congestion charging, and increased parking control. Such measures should be considered as part of the development of the Bath Transport Delivery Action Plan, which should include a traffic movement plan to identify a hierarchy of main and local distributor road networks.
- We welcome the EV strategy.
- Parking control including RPZs is an important tool to help the Council achieve its climate emergency and transport targets, including for LTNs. A large new car park on the recreation ground (or elsewhere in the central area) would be completely contrary to this objective and we are strongly opposed to it.