

Federation of Bath Residents' Associations (FoBRA)

Comments on WECA Joint Local Transport Plan (JLTP) 4 Consultation Draft

General

1. We welcome this comprehensive and ambitious programme of transport improvements. We strongly support the aim of reducing reliance on the private car and improving alternative modes of transport.
2. The whole city of Bath has been designated as a UNESCO World Heritage Site (WHS). This slips lightly from the pen, and it is easy to overlook its true importance. World Heritage Sites are 'places of outstanding universal value to the whole of humanity'. Those living in, working in and responsible for Bath today have inherited a glorious legacy from our predecessors, and we carry a weighty responsibility. We have a duty, as its current custodians, to keep the city in the best possible condition and to pass on this legacy intact to future generations.
3. Bath suffers from high levels of traffic congestion, which obscures the views of the historic buildings, prevents free movement of pedestrians, deters cyclists, imposes economic costs and spoils the city experience for residents, workers and visitors. High levels of air pollution harm the health of people who live and work in the city and damage the historic buildings. Bath is falling far short of its potential. Few would argue that it is worthy of its WHS designation. Action is needed to address the problems of traffic congestion and air pollution in order to transform Bath into a place which truly merits its WHS status.
4. While it is the case that investment in transport infrastructure has to be justified in terms of economic return, Bath's WHS status is of enormous economic importance. Bath draws millions of visitors each year to the West of England. If traffic is continued to be allowed to dominate the city, or to get even worse, Bath's attractiveness as a visitor destination, and even its WHS status, could be put at risk. "The traffic" is visitors' main complaint. The economic value of Bath as a visitor attraction should be factored into the assessment of proposed transport improvements.

Specific comments

p.10. We welcome the recognition in the draft Plan of the Bath Transport Strategy, which should sit under the umbrella of the JLTP4. We would like to see a clear articulation between the JLTP and the main elements of the Bath Transport Strategy, setting out the division of transport powers and responsibilities between WECA and its constituent Authorities. Otherwise, there is a risk of allowing important initiatives to 'fall between the cracks' (e.g. JLTP4 includes a Bath Cycle Network, but B&NES has no Traffic Movement Plan to integrate cycling with other modes).

pp.19-20. We welcome the inclusion in JLTP4 of specific objectives to 'Address poor air quality' and to 'Create better places', which were at best implicit in JLTP3. Bath suffers from traffic congestion and air pollution. While the latter is now being addressed in the Bath Clean Air Plan, traffic congestion and intrusion in the heart of the WHS must be reduced in order to improve the public realm of the city, including spaces which comprise the Key Elements of the WHS. This requires both the actions included within the Bath Transport Strategy and action at the level of the JLTP.

p.23. We welcome the creation of a JLTP Advisory Group, but we are surprised that residents as such are not recognised as a group having a critical interest. We believe that residents' groups including, in Bath, FoBRA, should be invited to join the JLTP Advisory Group.

p.25. We support the objective of giving priority to walking, cycling and public transport. This is the aim of the Hierarchy of Road Users, which has long been adopted by B&NES and no doubt other West of England Authorities. The key is actually to realise this objective and encourage, by both carrot and stick, modal transfer from the private car. This is well expressed in Figure 5.1. We strongly support the role of P&R in this respect.

p.30. Connectivity between Bath and Bristol Airport is currently poor. The Airport Flyer bus service is useful but it is slow and uncomfortable. Car access is either by congested urban roads or wholly unsuitable country lanes. A rail link from Bristol, with direct connectivity to a Bath service, is needed.

p.33. Coaches have an important role to play but their impact on urban centres such as Bath must be carefully managed. See our comments on coaches in Bath (pp.38-39, below).

pp.34-35. We welcome the recognition of the inadequacy of the A46/A36 as a major route from the M4 to the south coast. This is most marked in Bath where through traffic, of HGVs in particular, has a major impact as it passes through densely populated city streets. This traffic has an impact throughout the city. Vehicles seeking to leave the city centre have difficulty exiting onto the London Road, causing tailbacks into the very centre of the city on a regular basis. An alternative route east of Bath for this through traffic is essential. It is remarkable that nearby towns such as Warminster, Frome and Keynsham, and even Batheaston village, have benefitted from by-passes to remove through traffic, but not the World Heritage City of Bath, which continues to suffer from heavy through traffic.

We welcome the creation of Junction 18a if it will reduce traffic volumes on the A46 and through the centre of Bath.

We strongly support the case for a Freight Consolidation Depot serving Bath, ideally with small electric vehicles handling the final leg of deliveries within the city. In the meantime, time restricted delivery windows, as operated in many places in mainland Europe, should be introduced.

HGV weight limits are not currently enforced as this is not considered a priority by Avon and Somerset Police, which has the responsibility for enforcement of moving traffic offences. WECA should encourage the Police to enforce HGV weight restrictions, or seek the powers for local authorities to do so (as is the case in London).

pp.38-39. Page 38 presents a fairly balanced case, recognising that coaches can have a detrimental effect and require improved management. In the view of many Bath residents (and some, often tourist-focused, businesses), coaches are a plague. They are visually intrusive and generate high levels of congestion and air pollution. They park illegally. They leave their engines running illegally. Yet they are currently permitted to come into the very heart of the city and drop off just metres from some of the Key Elements of the World Heritage Site such as the Roman Baths, the Abbey and North Parade. Some coaches simply drive round the heritage areas without stopping, before moving on to their next destination at Stonehenge or wherever. A coach strategy is required which limits coach access to the

central area of the city (as in York). Drop-off points should be located outside the city centre, but within walking distance. We welcome the aim in the JLTP to 'provide improved pedestrian routes and wayfinding between coach drop off and pick up locations and key destinations, offering easy, high quality and convenient routes'. This must be applied in Bath.

It is vital that residents and businesses are involved in the development of the new Coach Parking Strategy for Bath. The approach of the previous, later withdrawn, coach strategy was essentially to ask what the coach operators, drivers and passengers wanted, and accommodate them without regard to the impact on the city or its residents. The consultants who drew up the strategy conducted surveys of the views of coach companies, drivers and passengers, but none of Bath residents. As a result, the strategy was totally flawed.

The 'Case Study' box on page 39 on Tourism in Bath presents a somewhat uncritical view of the value of coaches to Bath. Coaches which simply drive round and move on contribute nothing but congestion and air pollution to Bath. Two-thirds of coaches stay for less than 3 hours. Most visitors make a very limited contribution to the economy, with 50% spending less than £30, little of which necessarily stays in Bath. Arguably short-stay, low-spending visitors contribute less to the city than the harm they cause. A full and careful analysis is required of the actual contribution to the economy made by various types of coach visitors. Priority should be given to coaches delivering visitors for longer stays, which would support the aspiration for an upward shift in the quality and pricing of the Bath tourism offer. Coaches must be managed, not simply accommodated.

p.41. We welcome the explicit recognition that the availability and cost of parking is closely linked with the demand for motor vehicle use. Parking control is a vital tool for controlling traffic volumes. Objective W3 should specify traffic management and parking control as tools for managing demand.

p.43. We support the extension of a mass transit system to the Bristol-Bath corridor. Trams might possibly play a role in Bath in the future, but meanwhile improved bus services are needed.

p.47. In the short to medium term, improved bus services are needed to provide a cheap, reliable and attractive alternative to private car use. We welcome the bus strategy review. Given the critical role of the bus system to relieve car dependency in Bath and Bristol, the bus strategy should be considered simultaneously as part of the JLTP4 rather than as a separate matter, as it inherently links with almost all the components of JLTP4. The option of franchising, though mentioned only in passing here and in Appendix 2, has been highly successful in London, and we should like to see a higher profile for franchising in the review.

pp.53-54. We believe that P&R can play a vital role in intercepting traffic and reducing car movement into cities, in conjunction with measures to deter traffic from travelling in (carrot and stick). We strongly support a new Park & Ride site east of Bath. We support further expansion and improvement of the existing Park & Ride sites at Newbridge, Lansdown and Odd Down. This should include extending the operating hours later in the evening, provision of secure overnight parking, and provision for coaches. We would also welcome 'informal P&R' at suitable locations. The now-closed South Gloucestershire car park at M4 Junction 18 should be considered for Park & Ride, Park & Share, and for freight consolidation services to and from Bath.

p.58. We support steps to manage demand by parking control, and road charging. We support the introduction of a Clean Air Zone in Bath, although now approved it will have a limited and diminishing impact on traffic congestion. Traffic management is also an important tool for reducing congestion.

p.59. Currently, there are high volumes of traffic passing through central Bath and the very heart of the World Heritage Site. Central Bath must be excluded from the Key Route Network.

The A36 Lower Bristol Road is the designated east-west national through route for Bath. It requires improvement. 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.

Expanded use of the A420 should be considered 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 Saltford. But it is not even signposted to the east of Bath as an alternative route to Bristol (eg "Bristol avoiding Bath").

The case for a 'link road' from the A4 west of Bath to the A36 south of Bath should also be considered to reduce east-west traffic on the very busy A36 Lower Bristol Road through the city.

p.67. We welcome the commitment to restrict through traffic movement for heavy vehicles and most polluting goods vehicles in the central areas of Bristol and Bath. For a start, the existing HGV weight limit in central Bath should be enforced. Through HGV traffic needs to be removed from the city as a whole, and improved arrangements put in place for freight delivery. See our comment on pp.34-35 above.

p.68. We support a Freight Consolidation Depot serving Bath, including the use of small electric vehicles or cargo bikes for final delivery.

p.71. We support these Objectives. We propose an additional Objective:-

L6: Improve amenity and wellbeing by reducing the intrusion of traffic.

This would be in direct support of the JLTP Objectives to 'Create better spaces' and 'Contribute to better health, wellbeing, safety and security'. It would relate directly to the Vision of the Bath Transport Strategy 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'.

Should the JLTP not include targets for travel modes?

p.73. We support the Bath Cycle Network and City Centre Package.

p.75. Schools generate a great deal of concentrated movement at specific times, notably around 0800-0900 and 1515-1615. Cars are often preferred for these journeys and this inflates traffic in the morning rush hour and generates a secondary peak in the afternoon; it also deprives children and staff of routine healthy exercise on the journey to and from school. Congestion and pollution are a serious problem where schools are concentrated, as they are in

parts of Bath. The JLTP should commit WECA and the four Authorities to address these problems specifically by including a policy of reducing car movement in the vicinity of schools through parking control, public transport and traffic management, through public health education, and through supporting schools in preparing and enforcing travel plans for pupils and staff.

p.91. For years, Bath has suffered high levels of air pollution across the entire road network in the city. We strongly support all measures to bring air pollution well below the current legal limits.

p.97. We strongly support Objective N1. B&NES already has an excellent Public Realm and Movement Strategy (PRMS) for Bath. The challenge is to implement it. This will require action under the Bath Transport Strategy to remove the traffic that currently occupies much of the city centre streetscape. A comprehensive city traffic management plan would be required in order to deter rat-running in residential areas.

p.98. The reference to town and parish councils in the context of neighbourhood plans is incomplete. Bath has neither a city council nor parish councils, and in their absence it falls to residents' associations (where they exist) to articulate and represent local concerns. This section needs to be supplemented with a reference to residents' associations in areas lacking local representation (FoBRA, in the case of Bath).

p.102. Bath Case Study. We acknowledge the improvements that have been made in Bath, including Saw Close (which is not mentioned). However, a great deal remains to be done to implement the PRMS fully.

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