

**Federation of Bath Residents' Associations
Response to consultation on transport strategy**

1. Is the transport strategy right for the city?

FOBRA welcomes the development of a transport strategy for the city which has as a key objective reducing the intrusion of vehicles especially in the historic core (which we understand as comprising broadly the area from London Street to Charlotte Street, and Julian Road to the river). However we believe that it is also important to reduce traffic and the associated air pollution in other congested areas, for example London Road and Bathwick Street, which have some of the worst air quality in the city.

Traffic and air pollution are residents' top concern. There are excessive and unlawful levels of air pollution throughout the city. We are very concerned about recent research on the adverse health effects of fine particulates (PM_{2.5}) at levels below the current legal limit. The Supreme Court has ruled that the UK Government has an enforceable duty to bring pollution down to the levels set by its own laws, and the EU has launched a legal action against the UK for its failure to deal with air pollution. The time has come to tackle air pollution seriously, and this has to be done by reducing traffic volumes by means of an effective transport plan.

Key outcomes that we wish to see are:

- A largely traffic free city centre
- Public Realm and Movement Strategy implemented
- Vibrant public spaces
- Reduced traffic in the city as a whole
- High quality environment/good air quality.

2. Do you agree that the levels of walking, cycling, train use and bus use should be increased? Yes to all.

3. The Strategy proposes that there should be a new Park/Rail & Ride to the east of Bath. Do you agree? Yes. FOBRA strongly supports a park & ride or rail & ride to the east of the city.

4. If you would use a Park/Rail & Ride east of Bath could you indicate where you would be travelling from? n/a.

5. Would a new road linking the A4 Batheaston Bypass with the A36 be a good way of reducing city through traffic? Yes. We believe that a link road is essential if long distance HGV (especially vehicles over 7.5 tonnes), and other traffic is to be removed from the city. It is clear from the recent DfT decision on an HGV limit at Bathwick that traffic cannot be barred from Bath in the absence of a new alternative route. The Bristol/Bath to South coast Study showed major benefits from the removal of this through traffic from the city.

6. Do you agree that HGVs should be prevented from accessing the city centre at busy times and businesses encouraged to use a Freight Consolidation Centre which uses an electric vehicle? Yes. This would need to be managed carefully to avoid adverse impact on businesses. But many comparable European cities have controlled HGV access and have thrived because of the much improved environment for visitors and residents.

7. The Draft Strategy recognises that the use of the London Road and Cleveland Bridge as a through route creates serious problems for the city. Would you support measures to direct these vehicles to use other routes? Yes.

8. Do you agree that some one way road layouts (e.g. Pines Way and around Avon Street car park) should be removed to reduce the impact of traffic on nearby buildings? Yes.

9. The Draft Strategy identifies that rail will play an important role in the future with electrification of the inter city services and improvements to local trains with the MetroWest project. How should services to the West Wiltshire Towns be improved? More frequent services? Better Trains? Cheaper fares? Yes to all.

10. With the developments proposed in Bath, Oldfield Park Station will become a new focal point for rail travel. Service provision will be greatly enhanced. Would this make the service from this station more attractive to users? Yes.

11. The Provisional Strategy is proposing to increase Park & Ride. This will help to reduce congestion and potentially improve air quality creating an improved city centre ambience. Do you agree with this approach? Yes. But it is not just a question of increasing capacity. The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. There should be a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses, perhaps paid for by the accommodation sector or a broader tourism grouping.

12. The Draft Strategy is proposing that greater emphasis is placed on walking and improving mobility provision. This will be achieved through pedestrian schemes e.g. Stall Street. Do you agree with this approach? Yes.

13. Should we prioritise cycling along the river corridor with radial routes into the City? Yes.

14. Should the Strategy propose that we support more facilities for electric vehicles? Yes.

15. Should we help improve bus services by introducing more bus lanes? Yes.

16. What else would make you use the bus service more often? Cheaper fares, more frequent services.

17. The Strategy proposes that we find new locations where Coaches can initially drop visitors in the city centre before they go and park elsewhere. Is this a good idea? No. Coaches make a major contribution to traffic congestion in Bath, and they should not be brought into the city centre. At most, a drop-off point should be found on the edge of the central area; however this should not be in a residential area because of the noise and disruption.

Should options for the Coach parking include the expansion of park and ride sites to include a waiting area for coaches? A waiting area for coaches at the P&R is sensible provided there is sufficient capacity. In this case, coach passengers could take the P&R bus into the city. This would both halve the number of journeys (a drop-off needs four journeys - one in and one out to drop off and one in and one out to pick up). The vehicles bringing tourists into the city would also have emissions characteristics that are within local control.

Should the Strategy locate a new site within close proximity to the city Centre where coaches can park? We see no need for the coach parking area to be located close to the centre.

Anything else?

The strategy is currently expressed in terms of high level objectives. While it is vital to secure agreement to the objectives of the strategy, this will need to be followed by a transport plan containing a set of detailed projects with timescales and budgets, with annual progress reviews. An essential element of that will be a traffic management plan for the city aimed at reducing traffic volumes in the centre and other areas.

The strategy should recognise the fundamental connection between land use and traffic. It is essential that comprehensive traffic modelling studies are carried out when major developments are considered. An integrated plan for the A36 south of the river is required to support the Enterprise Area development. CIL funds should be earmarked for this. We have yet to see an assessment of the traffic implications the new housing developments planned on the edges of the city.

The school run has a major impact on traffic levels, especially in the morning peak. Most schools now have travel plans but these are neither kept up to date nor supported by the effort and resources needed to implement them. The Council, the schools, and the Education Funding Agency need to work together, with the Health and Wellbeing Board, to address this issue substantively and plot out a way forward for all stakeholders in the issue.

20th July 2014