

West of England Joint Local Transport Plan 4

Sustrans consultation response

Introduction

We welcome the publication of the JLTP4 and the opportunity to comment through the consultation process. We recognise the importance of setting out the planned transport improvements needed in the West of England to meet the needs of a growing region, faced with challenging growth targets for the numbers of new homes and employment opportunities in the region during the plan period.

We consider the JLTP in its current form to be more of a strategy than a plan in so much as it fails to set out and prioritise the transport projects that will both mitigate the impacts of the growth targets set out in the Joint Spatial Plan, and deal with the shortfall in funding the region has seen in recent decades. WECA needs to have a framework in place that links achieving targets with its choice of transport investments. Currently, WECA has allocated large sums to investigating the feasibility of several road schemes to support the Spatial Plan's (JSP) choice of development locations, but the expenditure on sustainable and active transport is unclear.

We hope that the Infrastructure and Investment Delivery Plan will deliver an appropriate prioritising framework, but we are concerned that political decisions will override the JLTP's warm words and balanced approach.

Vision and prospectus

The vision section of the document is the opportunity to set out a prospectus for what transport could be by 2036, however in its current form it fails to set out what travel for citizens will be like within and without the region by 2036. The language used should set the tone, talking directly in terms of beneficiaries of the interventions proposed – to the people who live in the West of England area. Some of the language used in the document is non-committal which should be avoided – phrases such as 'where possible' and 'could include'.

The objectives should also be ranked in order of impact on individuals and their interactions with the regional transport system. We would therefore put better places and population health at the top of this hierarchy, rather than below economic growth - this is a reflection of the lack of consideration of resident's involvement in overcoming the challenges set out in the document.

Manchester has a similar transport vision to ours in the West of England: “World-class connections that support long-term, sustainable economic growth and access of opportunity for all”. But their vision goes further and spells out “To achieve this we want 50% of all journeys in Greater Manchester to be made on foot, by bike or using public transport by 2040”. The JLTP in its current form fails to set the intentions and clear links between the statements in the document and any mode specific targets. The lack of mode specific targets is a glaring omission that needs to be rectified to be included in the vision section as a clear statement of intent - 'by 2036 we want...' to identify what success looks like and how success will be measured.

An attempt at this is made in Section 5: “We will provide a well-connected sustainable transport network that offers greater, realistic travel choice and makes walking, cycling and public transport the natural way to travel” – but it is left to page 25 in the document. This needs to be brought forward into the vision and the document itself needs to open with the vision – to set out clearly what the document hopes to achieve.

Section 1 - Setting the scene

We remain concerned with the Joint Spatial Plan process and some of the Strategic Development Locations chosen. Those located outside the green belt are too remote from employment, do not connect to existing sustainable transport infrastructure and will require much more significant levels of investment than is currently included within the JLTP4. We note from page 110 of JLTP that “Approximately half of total bidding, major scheme, and WECA gain share funding will be spent on mitigating the impact of JSP growth”. We would expect that as the JSP progresses through its examination in public that any changes made to Strategic Development locations will be reviewed and reflected in a revised JLTP4 or that additional infrastructure will be identified and included in a revised JLTP4.

Strategic Development Locations of particular concern include: Buckover, Charfield, Thornbury, Churchill and Banwell.

There is also a concern that the plan fails to deal with the significant additional traffic anticipated to use the Severn crossings as a result of the removal of the tolls. As a result we believe that there should be more formal links with the authorities in South Wales – either via the Sub National Transport Bodies structure or separately to discuss and deliver improved connectivity between the West of England and South Wales.

We would like the plan to set out governance arrangements and proposals for how WECA intends to oversee delivery of the plan. We would like to see the plan set out the clear division of responsibilities between WECA and the constituent local authorities, as well as a timetable for the transfer of responsibilities and resources from the local authority level to WECA.

We suggest that a stable long-term organisational platform is needed to manage the transport programme in the form of an Integrated Transport Authority. An Integrated Transport Authority would help to ensure a joined-up approach across the Combined Authority. For instance:

- to regulate and franchise public transport services
- to ensure a Workplace Parking Levy is applied in Bath and South Gloucestershire as well as Bristol, thus avoiding a distortion in the employment land market and

- to ensure a co-ordinated and consistent implementation of Park and Ride sites which often fall just beyond the administrative boundary of the authority that would benefit most

Section 2 - Challenges

The challenges are vast and should represent a wakeup call for the need to change course from our current predict and provide model for transport delivery. We currently forecast additional growth in motor traffic and then find the means to provide for it, but there is finite space on our transport network and we can't continue to build our way out of the transport challenge - but should instead recognise the need to make much more efficient use of our current networks. The document references the fact that our road network is 'strained', but capacity should be measured in terms of people throughput rather than vehicle throughput. As such we have spare capacity on our road network, but the current prevalence of priority given to single occupancy vehicles means that this space is being used very inefficiently. Whilst this is discussed in the document, there are no specific plans to consider how it might be achieved. When you consider how to do this on a particular road, typically an urban arterial route, you have to face into difficult decisions about how to allocate fairly the limited road width between the transport modes. If there is insufficient width for both protected bus space and protected cycle space, you may need to consider an alternative cycle route. The JLTP should commit to a study to investigate what is a realistic network of urban routes by each mode allowing for realistic decisions on reallocation of road space – taking into account a motor vehicle reduction target.

The scale of the challenge faced by the West of England is directly related to the number of short journeys made by car which could easily be walked or cycled if the infrastructure provided enabled people to do so. The plan is lacking clear targets for mode shift, without which it will be impossible to measure the success or otherwise of any of the measures set out. There should be an explicit target for reduction in single occupancy car journeys across the plan period – we cannot simply set targets for mode shift to sustainable modes without also targeting their origin.

We also consider that the climate change challenge has not been given sufficient weighting in the document. There is an opportunity for the West of England to take a lead on setting clear targets to meet the Intergovernmental Panel on Climate Change challenge of adopting a rapid reduction in carbon emissions by 2030 and not just to meet the Climate Change Act targets by 2050 but to exceed them. It is currently unclear how the measures proposed in the document might enable the West of England to meet its legally binding targets, let alone anything more ambitious. The environmental assessment also fails to take into account the IPCC challenge. In fact - the locations of some of the Strategic Development Locations will make it much harder to meet any targets given the car based nature of those developments.

Objectives

We believe the objectives should better reflect the scale of behaviour change required as set out in the Joint Spatial Plan. As such there should be an ambition for connectivity to enable seamless door to door journeys without the need for a use of a private car. This would immediately prioritise all other modes over additional facilities or measures that would increase existing capacity for motor vehicles.

Overall there is little to argue with in relation to the other objectives. However the objectives themselves appear divorced from the measures set out in the latter section of the plan. Neither are the objectives prioritised, and as such there is no way to interpret how the objectives will be met.

Technology and partnerships

While technology should be embraced where there is strong evidence that it will help to achieve one or more of the objectives of the plan in a cost effective manner, not all technology will do this and not all technology is helpful. The plan should not seek technological fixes that allow people to live just as they do now such as EVs to tackle air pollution and carbon emissions, as the number of cars would still lead to congestion, poor health and KSIs. The plan should also embrace:

- Low/no-cost solutions that would have a big positive impact
- Active travel as a serious transport option on a par with mass transit, rail and private car journeys
- Technology that is here and now (rather than 'just beyond the lifetime of the strategy', as described on page 9) such as:
 - embracing the opportunities of improved mobility for longer distances, terrain and age provided by e-bikes,
 - enabling the uptake of e-cargo bikes for family travel and freight deliveries

All of these forms of micro mobility are available now, taking little space, are non-polluting and have associated health benefits

We should also be mindful of technological fixes that simply poach users from other sustainable modes as well as being cautious to the unintended consequences of embracing new technology and planning to mitigate those wherever possible.

Connectivity beyond the West of England

High rail costs are an issue that need to be addressed – preferably on a national level. It is far more expensive to commute by train from South Wales to the West of England than it is to drive – which would appear perverse given the need to cut carbon emissions from transport.

More sustainable transport connectivity between South Wales, North Bristol and Avonmouth & Severnside needs to be developed to address the large numbers of commuters that travel on the Strategic Road Network on their daily commute – there is a tremendous opportunity to reduce single car occupancy amongst commuters. Coaches and bus services need to link the South Wales housing communities with these major employment areas – choices are very limited at present and require multiple changes. Commuter coaches should be explored with P&R facilities on the Welsh side to help facilitate more sustainable journeys into the West of England.

Any journey into the West of England should have a sustainable option to include an intercept at a park and ride.

Connectivity within the West of England

The cost of rail is prohibitive. Metrobus is a good example where people are moving from cars to bus – it is not only cheaper but quicker and less stressful as demonstrated by the recent Bristol Post commuter challenge from Stoke Gifford to

Cabot Circus. Orbital Rail connectivity needs to be improved beyond the ambition of the Metro West project with increased service frequency to at least 15 minute intervals to provide more of a turn up and go service. Without this, a half hourly service with peak capacity of some 250 seats/train will not provide sufficient capacity to impact on peak hour congestion.

The plan is currently weak on orbital mass transit. There is a definite need for improved public transport connectivity following the Ring Road from South Bristol and Bath to Emersons Green, Filton, Aztec West, Cribbs Causeway and into Avonmouth/Sevenside. Similarly there needs to be links between South Bristol to Portishead, Clevedon and Weston-super-Mare.

Park and Rides need to be multi-modal interchanges that also allow people to park & share; park & cycle etc. The sites selected need to have good cycle route connectivity built in. Lyde Green Park & Ride is a good example as is the Portway Park & Rail proposal. We would like to see a policy commitment to a general reduction over the plan period of the number of parking spaces available across the West of England, both in car parks and on-street. This would free up valuable road space for walking, cycling and public transport. The introduction of Park & Ride sites should be linked to a corresponding reduction of city centre car parking availability, so as a minimum they do not lead to a net increase in parking capacity. WECA should consider the compulsory purchase of multi-storey car parks in city centre locations to provide new mixed-use developments.

The use of e-bikes should be considered for journeys of up to 10km as they provide the ability to travel for longer distances with less effort. This will be particularly important for consideration of cross boundary routes particularly from the north fringe to Yate and Thornbury, from Bristol to Portishead and from Clevedon to Weston-super-Mare. The infrastructure provided for these inter-urban connections will need to be high quality to accommodate large volumes and to ensure continuity and flow.

Local Connectivity

The plan and the associated expenditure seem dominated by big schemes at the 'within the West of England' level. The Local and Neighbourhood schemes are covered in the words, but any detail is delegated to other documents such as Bristol City Centre Framework and the Local Cycling and Walking Infrastructure Plans, hence they do not feature much in the list of schemes. This gives the impression of a disconnect between the JLTPs aims and its spending plans. Yet there are more shorter journeys than longer journeys as set out in the plan itself emphasised by the fact that 40% of all car commutes in the West of England are less than 2km. We know that walking and cycling interventions are affordable, show high benefit cost ratios, and can be delivered more quickly than some of the larger schemes. We are therefore concerned at the emphasis on high-cost measures such as junction improvements and mass transit routes that might never get beyond the planning stages. We would therefore like to see more emphasis on demand management measures. These are discussed (page 57) but do not feature in the list of schemes. The JLTP should commit to a study of the opportunities for implementing demand management measures at the WECA level to enable parity across Bristol, Bath and South Gloucestershire, leading to a firm policy decision.

Significant emphasis is being placed on the LCWIP to provide a comprehensive Plan for investment in walking and cycling. Without access to the draft LCWIP it is hard to assess whether the LCWIP is ambitious enough, or whether it will carry sufficient

weight to draw in funding. Neither is there any demonstration on how priorities for investment and delivery will be set. We're concerned for instance that competition for space among modes will lead to the dilution of quality offered to walking, cycling and public transport – in favour of maintaining motor vehicle capacity. This is already being evidenced on the A4018 and Muller Road corridors and previous discussions about a cycle corridor along the A38 from Thornbury to the Bristol boundary have already been discounted. The proposal now appears to be a link from Thornbury to Aztec West roundabout then off towards Bradley Stoke following the Metrobus Route rather than a direct, high-quality segregated cycle route into the Enterprise Area through Filton and ideally to the City Centre.

More work needs to be done to educate vehicle drivers about the rights of cyclists to cycle on the roads, better highlighting the Highway Code rules around vulnerable road users and safe passing distances. We would like to see greater partnership working with Avon and Somerset Police and with walking and cycling campaign groups to understand the issue that those more vulnerable users face from road traffic and to develop a marketing campaign to tackle the issue.

We would like to see a behaviour change programme funded as business as usual activity, rather than being wholly reliant on central government grant funding. This should include residential personalised travel planning, workplace engagement activities and work with schools. Behaviour change activity should be targeted to coincide with other transport capital investment to maximise the impact of every investment in sustainable transport, as well as periods of considerable disruption, for example at Bromley Heath Viaduct/Gipsy Patch Lane.

Neighbourhood connectivity

We consider local connectivity as an essential foundation of providing sustainable travel across the West of England. As such, we would recommend that neighbourhood connectivity section was tackled first in the document, followed by local, within West of England and then beyond the West of England. This would enable two things – first to ensure that the start and end of every journey is able to be made by active means, and secondly would tackle the challenge of the number of unnecessary short car journeys on the network which are a main cause of congestion during the morning and afternoon peaks. Every journey begins or ends at home, and whether it's a walk or cycle to the bus stop, train station or for the whole journey, the last mile must be improved if the plan to be successful.

Focusing on local first would also enable the document to set out more of a prospectus and vision for the types of environments that residents will live in by 2036, highlighting and reinforcing the main objective of creating better places. The document sets out the desire to create better places, streetscape, public spaces and urban environments however, this does not come through in the list of schemes.

We would like to see walking given a much more prominent role in as an explicit transport mode in its own right for local journeys. The measures required to enable walking at a local level whilst similar to those required for cycling are distinct and require a separate response. We would like to see a ring fenced budget for walking, and where cycling infrastructure improvements are proposed, that this should never be at the expense from space for pedestrians.

If people do not feel confident and safe making a walking or cycling journey from their front door, or the car is seen as being the most convenient option, then the plan will fail to deliver its mode shift targets. We would like to see stronger reference in this section of the plan to forms of traffic restraint that enable walking and cycling to be faster alternatives to short car journeys. We're surprised that examples such as the Waltham Forest Mini-Holland haven't been included as case studies where modal filters have been introduced, traffic volume and speed has reduced and air quality has seen significant improvements – where school run emissions are expected to be reduced by 70% as a result of making walking and cycling the most convenient choices for local travel. E-bike delivery services also reduce the number of circulating LGVs on the network reducing risk of collisions and improving local air quality. Similarly, we would like to see a programme of measures aimed at disrupting the dominance of car journeys to primary school. School Streets programmes in Hackney, Edinburgh and Solihull are already demonstrating the impacts of small scale, low cost interventions on enabling more walking, cycling and scooting to school as well as removing the risks of road traffic collisions.

Interventions such as low traffic neighbourhoods would also not have to rely on the delivery of another measure to be successful. There is a general concern that many of the walking and cycling proposals will require road space reallocation on the main road corridors that will only be possible once mass transit or park and ride facilities are in place. Sequencing low traffic neighbourhoods at the front of the plan might prevent other more expensive measures from being taken, and combined with behaviour change activities could have a significant impact on reducing congestion and associated disbenefits on the arterial road network.

Spatial planning and planning policy are also important tools to enable more local journeys to be made by foot or bike. Accessibility and proximity to local amenities such as schools, shops and health services are fundamental to enabling more active travel journeys. We would like to see reference in the document not just to the LCWIP, but to Core Walking Zones and their role in improving the built environment around local centres across the West of England to enable more local walking journeys. There will also need to be significant consideration at the planning stage to sufficient provision within new developments for secure covered cycle storage for residential dwellings. Minimum numbers of cycle parking spaces will need to allow for ambitious growth in cycling trips. Retrofitting covered and secure cycle storage will also be particularly important. Large proportions of existing housing stock in Bristol and Bath have no access to gardens for cycle storage. This in itself is a major barrier to the uptake of cycling as a convenient travel option. There needs to be a programme of delivering on-street cycle hangars that is much more ambitious than that delivered with Cycling Ambition Grant funding. Again, Waltham Forest could provide a best practice case study – where over 250 on-street hangers have been delivered since 2013, significantly more than the 12 completed in the West of England during the same period.

Conclusions

Unfortunately we think the draft is more of a strategy than a plan. There is too much focus in the document on high-value, high-risk transport interventions that may not materialise, or fail to deliver the expected benefits. We think there needs to be a much greater emphasis on overcoming the challenges of too many local journeys made by car with measures designed to make the most efficient use of our existing highway capacity. We would also like to see a clear delivery plan set out for the next

5 years that is aimed at tackling short journeys by car and creating better places for people to live and work in.



Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

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