

Joint Local Transport Plan 4 Consultation

North Bristol SusCom Submission
20 March 2019

INTRODUCTION

North Bristol SusCom is a group of leading employers, from a range of sectors, working together to reduce congestion and enable the growth of sustainable transport in the North Bristol and wider travel to work area.

We know that combatting traffic congestion and increasing the viability of walking, cycling and public transport is vital for the long-term prosperity of our businesses and the health and wellbeing of our employees.

We work **strategically** with regional and national partners to attract investment for sustainable transport and support the development of a fully integrated, multi-modal transport network for North Bristol and surrounding areas. We also work to achieve **mode shift** within our own businesses by supporting our 45,000+ employees and 30,000 students to use sustainable modes and managing our transport impact.

North Bristol SusCom has been working directly with the West of England Unitary Authorities, through the local Enterprise Partnership and now with the West of England Combined Authority, for a number of years, to help the West of England achieve its long term ambition to deliver an integrated, sustainable transport network.

We welcome the opportunity to participate in the Joint Local Transport Plan consultation and believe the JLTP4 offers an opportunity to deliver a real step change in travel behaviour and to address the existing transport deficit which has impacted on the productivity of the region, our quality of life, our air quality and the health & wellbeing of our employees.

There are some general headline comments we would like to make about the Joint Local Transport Plan 4 plan followed by more specific comments/ observations about individual sections of the plan.

HEADLINE COMMENTS

Strategy vs Plan

The JLTP4 presents more like a strategy than a plan as it lacks specific proposals that are ready to take forward for funding and delivery. Developing concurrent 5-year delivery plans for the JLTP 4 to 2036 would help to demonstrate

how we plan to prioritise and sequence investment in the short, medium and longer term.

Vision

Throughout the JLTP4 there are many references to the need to see more journeys undertaken by walking, cycling and public transport. We believe this core ambition needs to be better captured up front and centre within the JLTP vision and objectives. It is vital that the JLTP4 articulates, to the people who live in, work in and visit the West of England, how we see people moving in and around the region in future and how we plan to get there.

It's useful to look at the approach Greater Manchester is taking with their Transport Strategy which has a very similar vision to ours: *“World-class connections that support long-term, sustainable economic growth and access to opportunity for all”*.

But they go further to say: *“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”*.

This simple statement, added to the vision, clearly sets out what their end goal is. It helps visualise where Greater Manchester wants to get to and what success will look like. It helps the people of Greater Manchester understand that they will have a role to play in delivering this vision for the future by making more of their own journeys by foot, by bike or on public transport and gives a clear indication that priorities and projects in the strategy will have to contribute to achieving that target.

A similar target or aspiration is missing from the JLTP4 and could make a significant impact if included. There were modal targets identified within the JTS but they do not seem to appear anywhere within the JLTP4.

Funding, Prioritisation, Sequencing and Integration

We agree that the West of England needs to be able to make a compelling, comprehensive case for investment and that a partnership approach is vital for that to be successful. But that compelling, comprehensive case for investment needs to be built around a clearer vision for how we see people travelling in, around and through the West of England by 2036. The current JLTP4 falls short of doing this in a clear, concise way – preferring to show only the direction of travel rather than a clear picture of what it will look like when we get there.

The JLTP4 needs to be clearer on how the overall programme will be delivered, in what sequence and how projects will be prioritised for funding. Many of the major schemes share inter-dependencies with one another and will be most successful when the wider programme of projects is delivered. If the full package of funding is not secured, we need to understand the impact that will have on the overall Plan, what elements won't be taken forward and the impact of partial delivery will be.

Prioritisation is also important. Greater clarity is needed on how projects will be prioritised for delivery. What is the process for prioritising one scheme over another? We need to prioritise the projects that will deliver mode shift to walking, cycling and public transport. We need to deliver economic growth without gridlock. Projects that deliver against all the stated objectives should be prioritised over those that meet only one or two. The aspirations in the vision and objectives are not met by some of the proposed major schemes, particularly those that are simply road building schemes. With limited resources identified at the moment we need to be clear what interventions will deliver us the biggest return in the long run.

Sequencing will also be very important as many of the projects outlined in the JLTP4 overlap or are interdependent. What happens when only some of the co-dependant projects are delivered? We need to give greater thought to what should be delivered and when and then seek the funding to deliver our programme in the right way, right sequencing. Let's influence and bend funding streams to deliver our plans and priorities instead of fitting our projects to match siloed funding streams. We need to get organisations like DfT to buy into our wider vision and bend funding to suit our plans and aspirations rather than compromising or scaling back our ambitions.

Much of the detail we are seeking will come when various studies are completed. We are concerned about how all the various projects will be brought together, integrated – especially when there are conflicts around competition for space. How will the Bus Strategy be brought together with the LCWIP? – so that everyone wins instead of everyone compromises where no one wins.

Behaviour Change

Where is the plan for delivering a programme of behaviour change activity through to 2036? Behaviour change activity is essential if we are going to increase the % of walking, cycling and public transport journeys – especially in the shorter term. We are in danger of losing existing expertise, experience,

strong working relationships if we do not plan now for what happens when the Access Fund runs out. Simply waiting for government to step forward and tell us what they may fund is not what our approach should be.

We need to develop a five year (minimum) plan for delivering a range of behaviour change activities. The plan should include engagement with schools, employers, health providers, tourism, inward investors, developers and the wider public to help shift people's travel choices to walking, cycling and public transport.

We need to focus activity around periods of disruption (like Gipsy Patch Lane Closure, Bromley Heath Viaduct), the launch of new services (Metrobus), the opening of new developments etc. to use those opportunities to drive modal shift towards walking, cycling and public transport.

We need a communications campaign to educate the wider public, politicians, employers, parents, young people, old people – everyone - on transport issues and how everyone has to take personal responsibility for the choices they make and highlight the better choices available.

We need to ensure things like the Annual Travel to Work Survey and Annual Travelwest Challenge can continue and not re-invent the wheel each year. We need to retain the expertise we have around behaviour change and not lose it through the short term funding system that operates currently.

None of this is clearly addressed or acknowledged within the JLTP.

Governance

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. Currently when the JLTP says "we", it is unclear when "we" is WECA and when it refers to "local councils". How will the shared responsibility be managed and who will be accountable?

The JLTP4 require a significant step change in terms of delivery and ambition. We need to be sure that we have the correct structures in place to achieve our goals.

SECTION 1: Setting the Scene

Joint Spatial Plan (JSP) – we are very concerned about 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 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 an updated JLTP4 or that additional infrastructure will be identified and included in a revised JLTP4.

SDLs of particular concern include: Buckover, Charfield, Thornbury, Churchill and Banwell where the mitigations proposed are minimal and will result in communities with a high car dependency.

Wales – we believe that there should be more formal links with the authorities in South Wales – either via the Sub National Transport Bodies structure or through a separate arrangement to discuss and deliver improved connectivity between the West of England and South Wales. This is especially important following the recent removal of the Severn Tolls. This issue needs capturing in Section 1.

SECTION 2: Transport Challenges in the West of England

“Parts of the road and rail networks are under strain” – we would argue that there is a huge amount of capacity on West of England roads – it is just that our roads are being used very inefficiently – giving priority to single car occupancy which is a very inefficient use of road space. We need to focus on how best we use our limited road space and give prioritisation to those vehicles or modes that move more people, more efficiently, more often.

SECTION 3: Vision and Objectives

As noted earlier, we think the vision needs to go further and include a modal shift target like they have in Greater Manchester - “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”. That is what is missing in the JLTP 4 – a statement of intent on what that our vision actually 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 needs to be brought forward into the vision with a clear target.

We believe the objectives should better reflect the scale of behaviour change required as set out in the Joint Transport Study. 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.

SECTION 4: Embracing 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 only seek technological fixes that do “make walking, cycling and public transport the natural way to travel”.

The plan should also embrace:

- Low/no-cost solutions that would have a big positive impact
- Walking and Cycling as serious transport options 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.

SECTION 6: 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 cheaper to commute by car from South Wales to the West of England than it is to drive – that is not how it should be.

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 SRN 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 service changes. Commuter coaches should be explored with P&R facilities on the Welsh side to help facilitate.

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

SECTION 7: 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. 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/Severnside. 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.

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.

SECTION 8 : Local Connectivity

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

We already have some concerns that 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. We need a good, segregated cycle route along the A38 from Thornbury through Filton and into the City Centre.

Many of our largest employers have high levels of cycling to work and this could be increased if the right infrastructure was put in place along the A38 North corridor. Businesses like Airbus, Rolls Royce, GKN and Southmead Hospital have staff who use that corridor to commute to work, many by car. We need to provide both metrobus and cycling infrastructure along that route through the A38 Filton to help get people out of their cars and reduce congestion.

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. Work in partnership with walking and cycling campaign groups to understand the issue that those more vulnerable users face from road traffic.

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.

SECTION 9: Neighbourhood connectivity

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 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.

Interventions such as low traffic neighbourhoods would also not have to rely on the successful 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 new roads, mass transit services or park and ride facilities are in place. Sequencing low traffic neighbourhoods to be delivered early on might prevent other more expensive measures from needing to be taken, and combined with behaviour change activities could have a significant impact on reducing congestion and associated dis-benefits 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. 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.

Yours Sincerely



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