Introduction

1. The Bristol Walking Alliance is a consortium of organisations (see bristolwalkingalliance.org.uk) committed to making Bristol the best city for walking in the world. We want to create a pedestrian environment that is welcoming, safe, convenient and inclusive. We want to build on the achievements of Bristol's designation as European Green Capital and the Good Transport Plan for Bristol. We work closely with other organisations and support the responses to this consultation submitted by the Sustainable Transport Network and by the Ramblers. We welcome this opportunity to help shape the future of transport in the region at a time of major change. We welcome too the frequent references to walking in the draft plan, and all the proposals to encourage it. We have, however, some major concerns about what will be achieved.

2. This response describes our main concerns. It then sets out where we would like to see changes in the text. Without these changes, the future of walking in Bristol looks bleak, with fewer attractive routes and more vehicular traffic.

Main concerns

3. Our main concerns are:
   - **too much road-building, which will create more traffic heading for Bristol.** There are major highway schemes already in progress and more planned, to give easier access to the city – from Yate, Clevedon, and on the A38 south of Bristol. Funding from Highways England looks secure and substantial, even if the exact sums are not known. There will be significant population growth in the region, much in locations dependent on car commuting if the JSP is adopted in its present form. Severn Bridge tolls have gone. The plan recognizes that public transport investment is more effective than road widening in dealing with traffic congestion, but this is not sufficiently reflected in its investment priorities.
   - **lack of commitment to traffic management measures.** There are few committed proposals to manage current or future traffic effectively. Only three new Park and Ride sites are programmed around Bristol, with two of those not certain. (Other sites are to be considered too but presumably their prospects are even less certain.) Charging and parking restrictions are mentioned only as possibilities, for which lengthy feasibility studies and consultation may be required. The inability of local authorities to co-operate is apparently another barrier.
• **lack of secure funding for walking.** Like almost everything other than road schemes, the plan’s walking proposals are described as ‘aspirational’. Bids to DfT will be made if the opportunity arises. Following the Cycling and Walking Investment Strategy (CWIS) Safety Review, the government is now "encouraging local councils to invest around 15 per cent of their local transport infrastructure funding over time on safe and efficient cycling and walking infrastructure". We urge WECA and its constituent councils to make that commitment, to include the commitment in the final version of the Joint Local Transport Plan, and to demonstrate that the planned schemes and packages listed in JLTP deliver on that.

• **lack of prioritisation and a clear plan.** The JLTP is a strategy, not a plan. Without a prioritised timeline of committed projects, it is unclear what is intended to be achieved even in the next two years, before the first planned review, let alone over longer periods.

• **lack of targets by mode.** We need clear targets to increase the numbers walking and to reduce the numbers driving in Bristol.

• **insufficient weight given to improving pedestrian routes.** Pedestrians in Bristol prefer not to share space with cyclists or to walk along busy main roads. Too many pleasant footways have already been damaged by Metrobus and other transport schemes; by the spread of shared space with cyclists; and by ‘alleygating’. This plan needs to make it clear it will improve and create attractive routes away from main roads.

**Detailed changes**

*(The Ramblers have also proposed changes which we support)*

**Section 2: transport challenges in the West of England.**

**P13.** Claim increased levels of walking from JLTP3 but not clear what measuring. *Need to give a clearer and less selective account of the outcome of JLTP3 generally, and describe the impact on walking levels in particular in more detail.*

**Section 3: vision and objectives.**

**P19.** It is disingenuous to claim that the list of objectives is not ranked, when the order is so odd. The usual approach to equal objectives would be to start with the one with the widest scope, and then list narrower or subsidiary ones. *The list should be put in a more ‘natural’ order: better places; equality and accessibility; air quality and climate change; health etc; economic growth.*

**Section 5: Improving connectivity**

**P25** Confusing distinction between rapid and mass transit. *Provide a clearer definition or remove the distinction.*
Section 7: Connectivity within the West of England

P41 second bullet. Managing parking supply “in a way that is acceptable to all authorities” … is unintelligible to the uninitiated. This bullet should be revised to give a firm commitment to restrict parking supply.

P47-8. GBBN brought significant improvements to the public realm and to pedestrian access in Bristol. There is nothing in the text here or in Appendix 2 to say that GBBN2 will do the same. Make it explicit that GBBN2 will be expected to deliver the same range of benefits as GBBN.

P53. Welcome concept of ring of P&Rs but in practice not proposing anything definite for Bristol except a long overdue M32 site. Other sites are only for consideration and not numerous. Need a firm commitment to more sites, accompanied by a reduction in parking in the centre of Bristol so traffic reduced.

P 55 Very tentative reference to road charging at the end. Should be strengthened to a firm commitment to investigate.

P57-8. List what might be done to influence demand but no commitment to doing anything. (Parking, road space, road user charging, workplace parking levy). Extensive feasibility and consultation work….All much too tentative. Nottingham case study on p112 shows charging compatible with economic growth. Replace with a firm commitment to introduce measures to reduce traffic in Bristol speedily, starting with a reduction in parking spaces.

P58 Support for Clean Air Zones in Bristol and Bath appears to have been ineffectual so far. Needs some stronger words. And a long-term strategy like the JLTP should be driven by longer-term air quality goals to meet the lower WHO emissions limits for NO2 and particulates.

Section 8: local connectivity

P74. Concerned that no commitment to fund LCWIP. Should not be wholly dependent on opportunistic funds from Government and/or developers. Relatively cheap and WECA should fund if necessary. Add to penultimate para: ‘WECA will provide funds if insufficient become available from elsewhere’.

Section 9: Neighbourhood connectivity

P98. Commitment to work with town and parish councils no good in Bristol, where don’t have them. Commit to work with neighbourhood groups in Bristol. Would also be good if encouraged more specialist active travel groups.
P101. Disappointing that not going to do anything directly on noise – just inspire Defra and partners including HE with their ‘aspirations’. Strengthen this reference? Disingenuous to suggest that transport schemes will improve green infrastructure through permeable surfaces and a little tree planting. Amend this to make it clear that these are mitigation measures for greater damage caused.

P103. Too many footways and open spaces in Bristol are now in the private realm. Would like many more routes accorded PROW status or similar to ensure public access in perpetuity. (Inspector at public inquiry recommended Metrobus 2 maintenance tracks should be PROWs, as in Cambridge, but no action has been taken). Do not want shared routes with cyclists to be the norm. Delete the reference to that and replace with: “We also support the creation of new active travel routes which should be given PROW status or similar to ensure public access in perpetuity. Existing footways should also be reviewed and re-classified as PROWs where appropriate.” Like support for active modes, especially first and last mile. Don’t understand penultimate para on page. Only first and last mile targeted for active modes, not whole of longer journey? And active not the same as non-car. (Recent FIRSTMILE experiment in Bristol used shared taxis). Need to re-write?

P104 There are many places in Bristol where the provision of a crossing is long overdue because of lack of funds. Would like this recognized in the text and a firmer commitment given to providing more crossings.

Section 10: Funding and implementation

This section needs much more detail about costs and priorities. WECA should make active travel, especially walking, a priority for the use of its own funds, because it is so accessible and improvements are so cheap. This needs to be firmly stated.

P111. Needs more urgency and commitment to investigation of charging options.

Section 11: Major schemes and summary of interventions

P114. Fig 11.1 major schemes. Clear illustration of how many new and improved roads will bring more cars into the heart of Bristol. It also shows the scarcity of Park and Ride sites in the north.

P116. ‘Transformational ‘major schemes. Potential costs doubled in 7 pages, from £2.5bn for 4 mass transit schemes in JTS on p109 to £3bn -£5bn for 5 schemes here. Costs of schemes not separately identified in Table 11.1 – just all described as ‘high’. Need to quote a consistent cost for mass transit schemes and clarify other costs.
Table 2: JSP transport programme. Includes Bristol cycling and walking package. 3 new Park and Rides in Bristol: M32, A38/A4174 and A4018. No proper costs: 6 high and 2 medium costs. *All these projects need clearer cost estimates.*

6 early investment schemes. 4 low cost but still costing £500m to £1bn. *Very approximate costs considering under way. Should be refined.*

**Section 12: Targets, indicators, monitoring**

(*The Ramblers have included many of these points and more in their response, which we support.*)

Will consider setting 6 year targets for ‘some’ indicators so can adjust. **Need them for all.** 17 years is unrealistic. Targets for the indicators ‘will be set’. Need them now! Embarking on an expensive programme without clear outcomes. Suggest some outcomes may never have targets eg bus satisfaction. Should do. Recognise importance of monitoring, an annual monitoring report and mid-term reviews. **Given plan coming in this year, why are there no targets for at least the next few years?**

Table 12.1. List of 20 indicators against JLTP4 objectives. The choice of indicators and their order is odd. There are not indicators for walking growth or traffic reductions, but do have indicators for cycle growth and bus and rail patronage. Could look at satisfaction levels of walkers and cyclists too, not just bus passengers.

Summary of indicators. Says 19 indicators but actually 20…As with objectives, not in priority order. Road congestion comes out on top because of its link to the first objective.

**Detail:**
- **Road congestion.** Wrongly expressed so appear to be seeking an increase in journey times. Very limited given huge highway expenditure.
- **Travel to work.** Good to monitor single car occupancy but also need to look at modal shift to active travel and public transport. Ie need same indicator as for travel to school - % increase in % of journeys to work by non-motorised modes and same for public transport.
- **Smart ticketing.** Very ephemeral indicator. Already the great majority on Bristol buses.
- **Car sharing.** Duplicates travel to work indicator on single occupancy?
- **Safety and security.** Not just on public transport. On streets and in open spaces too for walking.

Growth in walking included under cycle growth for active travel objective. Suggest will be using DfT annual monitoring stats for measuring increase in walking and cycling. If national data, hardly a measure of JLTP success because it will reflect action in the whole country. Should do surveys of walking numbers locally, as with cycling.

**Impact of transport network on environment.** Should not just use air quality. Noise, visual intrusion, loss of green and other public space, all important.
**P137. Streetscape enhancement.** Need survey on safety on streets.

**Neighbourhood renewal and regeneration.** Cycle growth an odd indicator. Need something more direct. House prices, business growth…

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