



# West of England Joint Local Transport Plan 4

---

## Consultation response from the Ramblers' Avon Area

*The Ramblers is a national organisation with two objectives:*

- *to protect and enhance all the places where people walk; and*
- *to promote walking.*

*The Ramblers' Avon Area has over 2000 members in eight groups, in all four local authority areas covered by this study.*

### Summary

The draft plan claims to want to encourage walking. It contains a number of proposals that would do so. Sadly these proposals are only 'aspirational', with no funding identified. The certainty is more road-building, which will encourage more traffic. This will make walking much less attractive. Traffic is already a major problem for pedestrians, especially in urban areas. The plan offers no assurance that it will be adequately managed in future.

### Key issues

We have major concerns about:

- 1. Traffic generation.** We recognise that population growth, especially in new settlements, will require additions and improvements to the road network. But overall the plan should be seeking to reduce traffic, particularly in urban areas, not to generate it. Building and widening roads to tackle traffic congestion generates more traffic and congestion in the long-term. Road schemes should not be such a large part of this plan.
- 2. Inadequate and uncertain provision for walking and other sustainable forms of transport.** Highway England's funding for road schemes is certain. Just about everything else in the plan appears to be dependent on bidding: it is 'aspirational'. The measures proposed to support walking – most of which we welcome - are relatively cheap. WECA has its own funds and it is not clear how they will be used. Walking should be a priority. The apparent size of the overall funding gap makes the expensive mass transit proposals fantastical, not just 'aspirational'.

3. **Inadequate traffic management measures.** The plan refers to various ways in which traffic might be managed to keep it out of places where it causes major problems. But there is no commitment to do more than 'consider' the use of regulatory and other powers. These powers should be used: they are flexible, effective and cheap (indeed often revenue-raising). It is disappointing that fear of objections from vocal minorities and lack of co-operation among local authorities are preventing this.
4. **Dependence on the Joint Spatial Plan (JSP) .** The JLTP is intended to support development proposed in the Joint Spatial Plan (JSP). The current draft JSP gives more priority to protection of the Green Belt than to sustainable transport. The proposals for major settlements beyond the Green Belt account for some of the expensive and environmentally destructive highway schemes in the JLTP. We hope the JSP will be revised in a way that will reduce the need for extensive roadbuilding. The plan takes no account of this possibility.
5. **Lack of priorities, costs, targets and indicators.** There are no clear priorities or costings in the plan, though the extent and advanced stage of planning of major road schemes shows where priorities lie. The proposed indicators are muddled and incomplete, with the road schemes apparently intended only to increase (presumably a mistake!) congestion and no indicator for walking.
6. **No understanding of walkers' needs.** Walkers' needs are not the same as cyclists' needs. They cannot be met simply by providing pavements next to schemes designed to increase and speed traffic. Walkers need specific dedicated routes.
7. **Lack of future proofing.** The world is changing fast. The plan describes some of the technological and behavioural changes, but takes little account of them. It puts forward proposals to meet current problems in a way that already looks out-dated ie by extensive road-building based on the assumption that current rates of car ownership and use will continue.
8. **Worse than JLTP3.** JLTP3 put the pedestrian top of the transport hierarchy. That proved fairly meaningless in practice. This plan doesn't even provide such theoretical recognition. Nor was JLTP3 overtly 'aspirational', though the buses that provided the justification for construction of the South Bristol Link road were subsequently described as such. The South Bristol Link is now full of cars and still Metrobus-free, having destroyed fine countryside and many rights of way. An unfortunate precedent.
9. **The consultation process.** Consultation on this ambitious and expensive programme has been unsatisfactory and inadequate. No further consultation is intended before the final plan is published later this year. The only proposals in the plan which we have seen before are those from the Joint Transport Study, on which we have commented twice. These are the only schemes described in some detail in the draft plan, and even they are not costed. The section of the draft on targets, indicators and monitoring is incomplete and requires much more work. Apart from work on the JTS schemes, it is not clear what will be done in the next few years.

Further, the draft plan has been produced in a way that makes it very difficult to read. No hard copies were available at its launch. Its two- column, two -page format makes it very hard to read on screen or to print. (My computer turned it into a sort of Chinese gobbledy gook). Although the Ramblers have statutory involvement in rights of way and enjoy good relationships with all four individual local authorities, we have had no contact with WECA. This seems a token consultation. It is not good enough, given the importance of transport and the sums of money involved.

## Detailed points

### Section 1: Setting the scene

**P 8 Local transport plans.** These may be largely aspirational bidding tools now, but they should still set out their priorities more clearly than this draft.

**Pps 8-9 JLTP3 achievements.** It would be helpful to have a less partial and biased account of what was achieved by JLTP3. For walkers, the changes to the public realm in the centre of Bristol are not an unqualified success, even if there is less traffic near the Cenotaph. Metrobus was used as an excuse to build a bus-free new road across the main pedestrian promenade. Crossing the roads has been made more difficult. Pedestrian routes now follow busy roads instead of keeping well away from them, and are shared with cyclists. Metrobus 2 and the South Bristol Link Road have also made walking less attractive. There have been huge cost overruns.

**P10 Other plans and strategies.** The full implications of the plan for walking are made hard to judge because details will be spelt out in the Bath and Bristol Transport Strategies; local and regional supporting strategies for walking; and the Local Cycling and Walking Infrastructure Plan. There should be consultation on all of these.

**P11. Strategic Environmental Assessment.** The summary at Appendix 1 contains useful recommendations which should be followed. It also shows JLTP 3 is better than JLTP4 for carbon emissions and health, which should be remedied.

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

**P13. JLTP3 walking levels.** Claim increased levels of walking from JLTP3 but not clear what measuring. Again a clear account would be helpful.

**P14. Climate change.** The warning that there could be more transport emissions with population change should not be allowed to be a self-fulfilling prophecy but instead a call to action.

**P15. Controls on cars.** Recognition of overdependence on car if not checked is welcome. Should be proposing to do more about it.

### Section 3; vision and objectives.

**P19.** The five objectives are not ranked. This is OK in principle but the order makes it look as if economic growth is most important and better places are least important. It is the quality of the environment that brings many people to the region. The list should be re-ordered.

## Section 4 : Embracing technology and partnerships.

Pps 20-23. A lot on technology, but very little on partnerships. There has been no proper contact with us. WECA feels very remote.

## Section 5: Improving connectivity

We like much of this section and Fig 5.1 is lovely. A pity it is only 'aspirational'.

**P25** There is a confusing distinction between rapid and mass transit. These need to be properly defined. Welcome the recognition of the importance of the first and last miles and walking. Need to provide good routes for a range of distances: many people will not walk for more than ten minutes while others will walk much more than a mile.

## Section 6: Connectivity beyond the West of England

**P34.** Roads and more roads – SRN, MRN, JTS, RIS etc. These will inevitably generate more traffic and reduce the attractiveness of non-car modes, especially walking. They will also destroy attractive recreational walking routes and environments.

**P35** Glad going to ask DfT to prioritise non car modes but sounds like another uncertain outcome.

**P36** Welcome proposed new walking links to Bristol Temple Meads station.

**P37** Only 'considering' measures to reduce problems from Severn Bridge toll removal. This is very late as the tolls have already gone, after a two year warning. There should be a firm commitment to take action.

**P38.** Welcome proposal for improved pedestrian routes to coaches. A coach strategy for Bristol is long overdue.

## Section 7: Connectivity within the West of England

**P41.** The second bullet about parking is extraordinary! Of course parking controls affect vehicular use – that would be the point of introducing more in this context. It is disappointing that there is a question about whether this is acceptable to the four local authorities.

The final paragraph in the challenges section is also extraordinary. It recognizes that the role of the private car needs to be managed but can only envisage expensive solutions. Regulation would be cheap and can be revenue raising. It is again disappointing that the political will is apparently not there to make use of it.

**P42.** Mass transit seems unlikely to happen. It is nonetheless concerning that it would be expected to make car travel in Bristol easier, which would generate more traffic. Walking routes to the mass transit stops are mentioned, but no other benefits for pedestrians.

**Pps 52-54** We support the proposed establishment of more Park and Ride sites and would like a bigger programme. We are concerned that these sections are better at describing possibilities than giving firm commitments. There should be firm commitments to creating a certain number of sites round the major centres with capacity for a certain number of cars, and to a certain number of sites elsewhere, close to longer distance bus routes. All sites should provide opportunities to Park and Stride, for transport and recreational reasons. The sites should be open for longer, as the draft suggests.

**P 55** Use of technology to keep traffic moving will encourage more car use. Better than road-building though.

**P57 -8.** Implementing measures to influence demand should be made a priority, not the subject of 'extensive feasibility and consultation'. Co-ordination on parking has been unproductive so far. Disappointing that authorities won't take action individually.

**Pps 59-63** Lots of well-developed road schemes show where priorities and funds are. Welcome recognition on p62 that public transport generally more efficient in long term at reducing congestion than road widening. Not obvious from proposals... Acknowledgment on the same page of need to site development near public transport, walking and cycling routes. At odds with the JSP's priorities....

**P 63** The plan proposes the re-allocation of road space to walking , cycling and public transport, but traffic would be diverted, not reduced. This will mean problems for walking elsewhere. There are proposals too for new road infrastructure for walking, cycling and public transport, but often as part of multi-modal corridors. These are not good for walking. Pedestrians do not want to be close to speeding cyclists and road traffic.

## Section 8: local connectivity

**P71.** Need to add walking to the list in the third bullet, alongside cycling and public transport. (Lack of confidence usually centres on routes. Toilets are important too!)

**P72 -75.** Could do with more walking examples to balance the cycling ones.

**P74.** There should be a firm commitment here to fund LCWIP irrespective of the success of random bids.

**P75.** Several points here:

- Re-allocation of road space is necessary but not always the best option for pedestrians. The best walking routes are away from traffic, cyclists and horses. Wider pavements would be welcome in many places though, especially if not shared with cyclists.
- Welcome the commitment to maintain routes and keep them free of obstruction. Would like to see a commitment to take a tougher line on 'alleygating' too.
- Walking should be promoted by partners as well as cycling! And walkers have fears about safety etc , just like cyclists. The text should be amended accordingly.
- **Pps 76 – 7.** Need support for schemes to encourage walking, not just cycling.

**P85** A rare firm commitment: to continue the Travelwest website and travel planner. Given Google's effectiveness, perhaps this should be made subject to review before resources are allocated.

## Section 9: Neighbourhood connectivity

This is an important section for walking. We share most of its aspirations. ***We would like to be involved in developing them further.***

**P 97** Last bullet in the second column should apply to all footways, not just PROWs ( unless all footways are made PROWs as we suggest later).

**P98.** Commitment to work with town and parish councils no good in Bristol or Bath, where don't have them. Will need to work with neighbourhood groups in Bristol. Would also be good if encouraged more specialist active travel groups.

**P100** Three points:

- The example of exaggeration by Bristol retailers and the value of pedestrian shoppers deserves wide promotion.
- The examples of public realm improvements are either old or questionable (the Cenotaph again). Whiteladies Road might be better.
- Welcome commitments on public realm enhancements – protect important buildings and locations, improve public spaces and address impacts of noise. Describe impact of noise.

**P101.** Several points:

- Not clear if going to do anything directly on noise or just try to inspire Defra and partners including HE with their 'aspirations'. Hope the former and that this will be made explicit.
- Disingenuous to suggest that transport schemes will **improve** green infrastructure through permeable surfaces and a little tree planting. They can only **mitigate** their harmful impact, as with noise. Metrobus has damaged green spaces in Bristol and the major schemes in this plan are set to tear up large swathes of countryside.
- Appear only to see working with developers to ensure access by walking, cycling and public transport applies in urban areas. Should go more widely, though the JSP makes it difficult.
- Lots to like in the detailed proposals. Welcome recognition that improvement of walking and cycling network critical for access to services and economic growth.

**P102.** More welcome statements, including on segregation ***Particularly welcome the commitment to provide clear waymarking and signage. (Would like to be consulted to check there will be no confusion with the usual signage on PROWs).***

**P103** Welcome recognition of importance of rights of way and rights of way improvement plans, and the commitment to safeguarding them. Would like two changes:

- Concerned by the suggestion that in future the norm should be for shared use by pedestrians, cyclists and equestrian users. Shared use is only suitable in some

circumstances. Segregation should be the norm. Routes for walkers only will be anyway cheaper to provide than shared routes.

- Would like many more routes accorded PROW status or similar to ensure there will be public access in perpetuity. All new footways should be made PROWS. Other footways should be reviewed: pressure should be put on owners in the public sector in particular to dedicate them for permanent access and private sector owners should be encouraged to do so too.

Like support for active modes, especially for the first and last mile. The penultimate para needs some re-wording to make the concept clearer. We would want to encourage people to walk the first and last mile wherever possible but accept that in some cases non-car alternatives are more realistic. The recent MYFIRSTMILE experiment in Bristol used shared taxis,

**P104** Residents have already identified the need for safe crossings in many places in Bristol. Their provision has been held up by lack of funds. No doubt it is the same elsewhere. A commitment to deal speedily with the backlog would be welcome.

## Section 10: Funding and implementation

**P 109** The scale of the ambitions and the size of the funding gap are extraordinary! It would be more helpful to produce a properly costed plan that is more likely to be achieved. A clear commitment is required to making the cheaper active travel options a priority for WECA's own resources.

**P111.** Little action proposed to limit the funding gap. Are the authorities going to challenge the Government's cuts? Again various charging options are identified without enthusiasm Still commit only to feasibility studies and consultation.

## Section 11: Major schemes and summary of interventions

**P114.** Fig 11.1 is scary for those who value walking. New highway schemes will carve through countryside everywhere. New and improved roads will bring more traffic into the centre of congested Bristol with very limited P&R provision, especially in the north of the city. Bus route improvements, Metrobus and mass transit may also be covers for more road building, like the first Metrobus schemes.

**P116.** The potential costs of the transformational schemes have doubled in 7 pages, from £2.5bn for mass transit schemes on p109 to £3-5 bn here. Costs of schemes not separately identified in Table 11.1 – just all described as 'high'.

**P118** Table 2: JSP transport programme. Includes Bristol cycling and walking package. 3 new Park and Rides in Bristol: M32, A38/A4174 and A 4018. No detailed costs given: 6 high and 2 medium costs.

**P119** 6 early investment schemes . 4 low cost but still costing £500m to £1bn. Very approximate costs considering these schemes are under way.

**P120** 21 early investment schemes costing £2-2,5bn.

**P121** 6 longer-term aspirational schemes, costing £0,5-1bn.

***Given there are rough totals and the huge sums involved, it is unacceptable to give no approximate costs for individual schemes.***

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

***This section is extraordinarily poor. It appears to have been hastily compiled and is incomplete.***

### ***More consultation needed***

**P125.** The draft plan claims to be “the most ambitious transport programme the West of England has seen.” The potential cost is clear, not what it will achieve. ***The draft recognizes the need for targets and indicators but these are poorly developed.*** The suggested indicators are inadequate and targets barely exist. ***This is a key area on which there should be further consultation.***

### ***Monitoring periods and target coverage***

The draft suggests setting 6 year targets for ‘some’ indicators so that they can be adjusted. 17 year targets seem unrealistic for anything. ***There should be 6 year and 17 year targets for all indicators, with a clear statement of the progress expected by the end of each three year monitoring period.*** (The monitoring periods are set out on p126, not page 120 as stated).

The draft suggests targets for most indicators ‘will be set’. It is extraordinary that only one already exists. The plan is due to take effect this year and the first monitoring review is only two years away, in 2021. There should be at least two annual monitoring reports against targets and indicators before then. Even more extraordinarily, the draft suggests there will be no targets for some indicators/outcomes, including the major investment to support the JSP (because of alternative scheme-specific evaluation). ***This investment is such a large part of the programme that it should be brought within the overall monitoring framework. The reasons for excluding other indicators/outcomes is weak too, given the scale and importance of this programme.***

### ***The indicators***

***(!) Presentation***

**P126.** Table 12.1 lists 20 indicators against JLTP4 objectives (not 19 indicators as it says in the text). They are listed in the order in which they appear in table 12.2, which puts them against the outcomes for each of the five objectives listed earlier in the draft. The order of indicators is not intended to imply an order of importance. This method puts road congestion top of the list and produces a very odd sequence thereafter. The three bus-related indicators appear at nos 2, 4 and 9 on the list, for example. ***A more straightforward list of indicators by type (mode of transport, environment, information etc) would make it easier to understand and to spot overlaps and gaps. It is essential that there is a comprehensive and distinct suite of indicators and targets.***

(2) Coverage: omissions and duplication

**P126** This is an odd list of indicators. ***Our main concern is that walking growth is not included, although cycle growth is.*** Walking growth is implicit in the Travel to School and Travel to Work indicators, but so is cycling. ***We suggest including an indicator for walking growth with a target of 5% a year.*** We are also concerned that there is no indicator relating to the number of cars and other vehicles on our roads. Traffic is such a problem for pedestrians (and others) and so much is to be spent on roads that the overall numbers need to be monitored, along with the average length of journey and a breakdown between rural and urban traffic.

There are other oddities:

- 3 (overlapping) indicators for buses but only one for rail. Nothing for coaches.
- Air quality, carbon emissions and electric vehicles (which overlap) are the only environmental indicators. Nothing on noise, green spaces, visual intrusion, impact on landscape and streetscape..
- Nothing on traffic management eg Park and Ride; other parking provision; charging.
- Nothing about safety on the streets.
- No concern about levels of satisfaction except on buses.
- Given the proposed expenditure on roads, there should be more indicators than just road congestion and maintenance. There should not be any significant expenditure without a measure of its impact.
- Conversely, does smart ticketing really need an indicator? It is ubiquitous already.

***Summary of targets and indicators***

**P128.** The summary of targets and indicators contains no numerical targets except for road congestion, and that is plainly wrong. So is the count of indicators.

Detail:

- **Road congestion.** Wrongly expressed so appear to be seeking an increase in journey times. Very limited ambition given huge highway expenditure. Could generate more traffic.
- **Unlocking residential and employment growth.** Not acceptable to have no generic targets when the expenditure on the programme is so huge and widely spread. It will not be possible to attribute everything to individual schemes and their cumulative effect should anyway be measured.
- **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 target as for travel to school - % increase in % of journeys to work by non-motorised modes, preferably broken down into walking and cycling, and a similar target for public transport.
- **Smart ticketing.** Very ephemeral indicator, as pointed out earlier. Already used by the great majority on Bristol buses. And why not a target for trains too if keeping the indicator?
- **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.

## *Monitoring methods and data sets*

**p130 onwards** Table 12.2, which lists every indicator against every outcome with its associated monitoring methods/datasets and targets, is repetitive and confusing!. There must be a better way to present this . Adding the monitoring methods to the previous list of targets might help, as would . some numbering of outcomes.

.Detail

- **Walking growth indicator.** Relevant to all the same outcomes as identified for cycle growth. We would have expected both to be relevant too to: the connectivity outcome at the top of page 132; low carbon transport at the top of p133 ( repeated slightly differently on p135 where both walking and cycling are included); the environmental impact of the transport network at the bottom of page 136; and streetscape etc at the top of page 137...
- **Healthy low carbon walking etc. P135.** Draft suggests using DfT annual monitoring stats for measuring increase in walking and cycling. If these are national data, hardly a measure of JLTP success. Should do surveys of walking numbers locally, as with cycling.
- **Impact of transport network on environment P136.** Not just air quality. Noise, visual intrusion, loss of green and other public space all important.
- **Streetscape enhancement.p137** Need survey on safety on streets
- **Neighbourhood renewal and regeneration p137.** Cycle growth seems an odd indicator, as walking growth would be. Need something more direct, such as house prices or business growth. (Problem of no target for the unlocking residential and employment growth indicator).

**Susan Carter**

*Chair, Environment and Planning Sub-Committee,  
Ramblers' Avon Area.*

*20 March 2019*