

CPRE Avonside Response to Draft Joint Local Transport Plan 4, February 2019

March 2019

How far do you agree with the challenges?

CPRE Avonside agrees with the many challenges that have been identified for the Joint Transport Plan (JTP). However, we also consider that in some very important respects these challenges are still understated. In particular:

1. The difficulty of managing and securing the large number of complex planning consents needed to implement much of the programme.
2. The difficulty - perhaps impossibility - of implementing projects in advance of the key elements of the Joint Spatial Plan (JSP) (insofar as those are eventually approved) as promised elsewhere in both the transport study and JSP itself.
3. The continuing failure, despite claims to the contrary, to take a genuinely holistic approach to a number of major challenges, most notably the challenges of air pollution and congestion. For these key issues not only are specific targets missing but the impact of major projects, such as Bath's decision to implement a clean air zone, are not fully quantified and assessed as part of the region-wide strategy.
4. The acknowledgement in the document itself that the necessary funding has yet to be secured and that the prospects of doing so are uncertain.

How far do you agree with the vision and objectives?

CPRE Avonside agrees with the vision and objectives, but fundamentally questions whether the measures proposed will deliver those objectives; or, as we are more inclined to think, will in fact work directly against achieving them.

The proposals for new roads, for example, represent a high long term environmental cost for potentially very short term benefit, impacting on the character, tranquillity and biodiversity of our local environment. Research clearly shows that, without a reduction in demand, new roads quickly get 'filled up' within a few years as, in response, people change their habits and congestion returns to previous levels.¹

How far do you agree with the approach for improving connectivity for trips beyond the West of England?

¹ *'The End of the Road: Challenging the Road Building Consensus'* CPRE, March 2017

CPRE Avonside recognises the importance of connectivity for trips beyond the West of England. These are important for business, and in particular for rural businesses whose connectivity with strategic road and rail networks is poor and deteriorating across parts of the West of England area. However, we consider that more thought needs to be given to some important aspects of this 'wider' connectivity. In particular:

1. The planning application for massive expansion of Bristol Airport has serious implications for traffic and transport across the whole region and these have not been fully factored into assessments of congestion, delays, pollution and diversion onto unsuitable roads. The case for expanding Bristol Airport needs to be firmly resisted as both unnecessary for this region's connectivity and detrimental to the other valued characteristics of the West of England region.
2. The admission in the JLTP 4 paper that the traffic impacts of the removal of the Severn Crossing tolls have not been fully evaluated is worrying and unacceptable. More work is needed to understand what the impact will be and whether it can be accommodated along with all the other additional pressures that the JSP (if adopted) would bring.

How far do you agree with our approach for improving connectivity within the West of England?

CPRE Avonside supports, in principle, many of the possible measures for improving connectivity within the West of England region, especially where these rely primarily on the improvement of and investment in sustainable public transport. However, this category of 'connectivity' covers journeys above 10 but less than say 50 kilometres - journeys that are of particular significance to rural residents and businesses. In CPRE's view the JLTP 4 fails adequately to identify or address this important element of connectivity. This is a major gap in the proposed transport strategy and is of particular concern to us as it relates directly to the prosperity and quality of life of the countryside - its residents and businesses.

Specifically, it is essential to address the following points:

1. Such journeys are typically unlikely to be able to sustain viable public transport services.
2. Such journeys are usually not suitable or practicable using the preferred sustainable modes of walking or cycling but are vital to rural residents going about their daily lives and businesses.
3. Rural residents and businesses need to travel to and from the rural areas into and out of the major urban centres. While some of these journeys may be catered for by improved provision of Park and Ride, these should be smaller, localised facilities, using existing car parks where

possible, rather than large, land hungry, edge of town Park and Rides. There also needs to be more recognition that for a significant number of people without access to a private car, and for people needing to move goods, equipment, and for many families, transferring to Park and Ride is frequently impracticable and over-reliance on this will leave them increasingly disadvantaged.

4. Some of the Strategic Development Sites in the JSP are so far out from the major cities that they will in fact generate exactly these types of journey - just the sort of traffic that the JTP aims to avoid and deter.

5. These proposals therefore risk further isolating and cutting off rural residents and businesses from the key urban centres and transport hubs to which they need access.

How far do you agree with our approach for improving local trips in the West of England?

Subject to the clearer distinction between genuinely local trips and the longer intra-regional trips discussed above, CPRE Avonside broadly supports the approach to this category of 'connectivity' with its emphasis on sustainable forms of transport such as walking and cycling.

However, we consider that more attention should be given (it is in fact almost wholly lacking) to connectivity for urban residents by public transport between where they live and the neighbouring countryside which is one of the major and most valued 'quality of life' aspects of the region. It is this quality of life that is often what attracts people and businesses to the West of England in the first place, and makes this area a special place to live. We need to ensure that all urban dwellers have sustainable access to their local countryside, so those benefits can be realised.

How far do you agree with our approach for improving connectivity for neighbourhood trips in the West of England?

CPRE Avonside supports the strong emphasis on walking, cycling and dedicated routes for such journeys.

Additional comments

The questions - and the responses - provide above do not adequately allow for a more strategic critique and commentary on this paper. This is important because CPRE Avonside has major reservations about the whole overall approach. Regrettably we do not consider that JTP 4 actually advances the discussion to the point at which it is possible to evaluate deliverable solutions to the huge challenges. Indeed, the level of discussion is better described as an

‘aspirational wish-list’ rather than an actual ‘plan’. In that respect the paper is less helpful and less specific than the most recent technical papers published under the broader JSP and JLTP Consultation process.

In one sense it is hard to disagree with any of the aims and objectives in the paper. CPRE Avonside has always supported greater investment in public transport and in other sustainable forms of transport. We have also always advocated much better management of car use in the interest of reducing congestion, pollution and economic dis-benefits. The next stage in a sound planning process should be to identify which solutions are best fitted to specific circumstances and problems and to quantify the extent to which they are likely to be effective. Only at that stage does a catalogue of possible measures and schemes start to become a plan. JTP 4 fails to make that vital jump to being a plan that can be sensibly evaluated as such.

Specifically, CPRE Avonside observes that:

1. The paper remains weak as regards economic and scientific quantification of how measures, both individually and cumulatively, would impact on the key targets such as legal compliance with pollution targets, congestion and delays, mitigation of the JSP effects and improvement on existing transport and traffic conditions on key routes.
2. The paper is helpful on the challenge of funding the required transport infrastructure, but only to the extent that it highlights the size of the “funding gap” and the highly speculative approach to filling it. We would suggest that looking to central government to fill much, if any of this ‘gap’ when the region is acknowledged to be one of the wealthiest and least deprived in the UK is completely implausible.
3. The paper is predicated on the assumption that the wider JSP development proposals will survive Public Examination largely unscathed. It needs to be recognised that this is unlikely to be the case and that the near impossibility of achieving the transport vision should cast doubt on the wisdom of pursuing the JSP in its current form.
4. The vague timescales allocated to schemes (very few of which are short), may well be designed to allow for inevitable early slippage. However, by ticking both the medium and long-term boxes for the most demanding schemes the danger is that catastrophic failure is not identified until the 2030's are reached - when much of the JSP development is under way despite the promise of the infrastructure being delivered in advance.
5. The separate Environmental Report raises more concerns than it resolves. In the vast majority of instances it concedes that the environmental impact of the measures is either as yet unquantifiable or fairly minimal. Other transport papers under the JSP heading either

indicate a worsening of the region-wide environmental impacts or positive effects which may just about mitigate the effects of full implementation of the JSP. The JLTP 4 proposals therefore offer little or no prospect of reducing current levels of environmental impact, even though some of these are already above legal limits. Bristol is already coming under pressure from Central Government to do more, much faster. Similarly, the Clean Air Plan for Bath aims to reduce high levels of nitrogen dioxide (NO₂) in the city to within legal limits by 2021. While moves towards tackling these issues are to be welcomed, they need to be judged in the context of a longer-term transport plan that fully and in quantified terms addresses the specifics of both carbon and particulate reduction. The broader reality is that any transport strategy that fails to make significant inroads on the environmental issues cannot, by definition, be consistent with the overall 'Vision' of a region that is sustainable and makes the most of its exceptional, indeed unique geographical and natural setting, hugely valued by its citizens.

6. A major weakness in the JSP is the failure to assess the consequences of not delivering the critical infrastructure (especially transport infrastructure) and making contingency plans, something required of a Local Plan. There is no explanation in this, or other papers, of how the delivery of infrastructure and housing will be coordinated despite past assurances that the key infrastructure improvements will be delivered ahead of the main developments. An example of this is the MetroBus infrastructure needed to make the strategic sites sustainable. Undertakings to clear the routes of congestion either by radical traffic management or construction have simply disappeared. Local authorities do not have the powers to phase the development and do not have the funds for the essential transport infrastructure. It is impossible to see how the earlier commitments can be kept, vital though they are.

CPRE Avonside
March 2019