

## BRISTOL TRANSPORT STRATEGY CONSULTATION RESPONSE

**North Bristol SusCom Ltd.** is a group of major employers, located in North Bristol, promoting **sustainable commuting** to our 40,000 employees, 30,000 students and visitors. We are working together to influence and improve local sustainable transport provision to **combat traffic congestion** and reduce the impact upon our environment.

North Bristol SusCom has been able to input into the development of the Bristol Transport Strategy through our participation in the Mayor's Congestion Task Group. We appreciate having that opportunity and are pleased to see that some of our recommendations and ideas have made it into this draft document out now for consultation.

The West of England has ambitious economic growth plans over the next 20 years. Those plans include ambitious targets for reducing car use whilst still delivering economic growth. Achieving reductions in single car occupancy and increasing use in sustainable transport are absolutely vital if we want our economy to grow sustainably and stop being choked off by congestion and poor air quality.

The need to replace car use with more active and public transport modes needs to be strengthened and reflected in the priority of the outcomes and interventions to be taken forward. This is true for both the Bristol Transport Strategy and Joint Local Transport Plan. Priorities for investment and priorities for citywide outcomes should be measured against how they tackle single car occupancy levels and increase use in sustainable transport.

We also need to get better at helping the general public, and politicians, to understand how successful and more liveable a place Bristol and the West of England can be for all its citizens if we invest in and prioritise sustainable transport. Investing in sustainable transport infrastructure and services benefits everyone including those who continue to drive (hopefully with a higher occupancy level and in more efficient and cleaner vehicles).

### **Sequencing and Prioritisation of investment**

The Transport Strategy could be clearer in outlining how investments will be phased and prioritised by focusing on

the most sustainable forms of transport first, like walking and cycling which also can be delivered more quickly. The Manchester Beelines project is an excellent example of how a major walking and cycling investment programme can be identified, prioritised and developed in the short-term with delivery happening over the short-medium term. It also has clear criteria for a route to be awarded Beeline status - if the criteria is not met the project doesn't get Beeline status or funding.

Focus at the Bristol and West of England levels seems to be exclusively on the medium to long term projects/investment when we should also be looking at what can be done in the short to medium term. Many short-medium term investments can deliver mode shift far more quickly and even alter the scale/need of some medium to longer term investments which inevitably are much more costly. We need to get away from the either/or mentality of sustainable transport and develop a programme of investment that looks at both active and public transport in the short-medium and long term. At the moment active transport is often ignored or only looked at in small, piecemeal fashion.

As Group, North Bristol SusCom has not met to consider the Bristol Transport Strategy. But our focus on sustainable transport has fed into this response. North Bristol SusCom is also a member of the Bristol Green Capital Partnership's Sustainable Transport Network (STN). We have fed into the development of their consultation response and have incorporated some of the points below that were raised in discussions following a presentation from Bristol City Council on the Bristol Transport Strategy to a recent STN meeting.

### **Efficient movement of people and competition for road space**

The document refers to the need to improve the efficient movement of traffic around the city (Outcome #1), which in this instance is assumed to mean cars. This is at odds with many of the other objectives, particularly those relating to vulnerable road users and quality of place.

The objectives should be about the 'Efficient movement of **people** around the city...' this would reinforce the need to use our limited highway space as efficiently as possible, as demonstrated by the graphic on page 41.

This would also enable a clearer sense of what happens when there is conflict and competition for space at design stage between modes, with a decision

pathway clearly in favour of the most sustainable and most efficient uses of space.

### **Strategic projects for active travel**

There is a sense, either implied in the document, or from consultation events, that walking and cycling will not be treated as strategic transport modes, and that implementing change will be reliant on the piecemeal assembly of funding from developments and smaller scale investments. We believe there is a need for walking and cycling to have their own separate funded programmes to ensure the development of networks of high quality walking and cycling routes enabling end to end journeys.

Given the scale of change required to meet the vision that the document sets out, walking and cycling networks will need to be delivered at pace, and at a scale similar to London and Manchester. We would recommend that Greater Manchester's Beelines programme is included as a case study to demonstrate the scale of project possible in the UK context with funding already available at the Combined Authority level. This could include images of how the streetscape can be transformed, which helps demonstrate what could be achieved.

Currently the document is too focussed on the success of some of the longer-term, higher risk projects such as a mass-transit system. We know that smaller scale alternatives such as walking and cycling schemes can be delivered for a fraction of cost, in a fraction of the time and we advocate the long-term trialling of traffic removal on key corridors to test the impacts of traffic evaporation before commitments are made to create new, alternative road capacity.

### **Workplace Parking Levy and Congestion Charge**

Most of North Bristol SusCom members are located outside the Bristol Unitary Authority, with the exception of Southmead Hospital and some smaller satellite offices our members may have within the City.

Both a Workplace Parking Levy and Congestion Charging should be investigated further both as ways of generating funds to improve investment in sustainable transport infrastructure **and** of influencing behaviour and the choices people make in how they travel to/from work.

SusCom members discussed these two types of schemes a few years ago but have not been able to revisit those discussions during the open consultation

period. We will endeavour to do so at our November members meeting. In the meantime here are some of the issues we originally discussed on this topic.

**Workplace Parking Levy** – we are assuming that further work will be commissioned to look into a Workplace Parking Levy in greater detail. Some areas we would expect a further study to look at would be:

- A WPL does not tackle all the contributors to congestion – it ignores other peak time road users (delivery vehicles, school run etc) – would a Congestion Charging zone be more fair and effective?
- Will employers absorb the cost or pass it on to their employees – makes a difference to the impact it will have on reducing congestion – if employees have to pay it may have greater impact on their behaviour
- Is the Levy designed to raise money or influence behaviour – should be both
- Will it make people simply park off site and in neighbouring streets (will be a major issue if there is no RPZ nearby)
- Need to look at a West of England wide approach to a WPL or at the least the impact it would have on neighbouring areas
- We have a couple of members who already charge their employees to park – it can lock people into an unintentional pattern of behaviour – “I’ve paid to park so I’m going to drive”.
- Our members who charge employees (usually a % of their salary) use that money to reinvest in sustainable transport measures on their sites – this would be affected by an area wide WPL
- A workplace parking levy needs to be part of a wider parking strategy, which ensures that employers/employees are not charged more for parking than other road users – but that all are charged enough to influence behaviour.

**Congestion Charge** – this appears to be more equitable in terms of targeting all road users in a specific area. However, many of our members run essential services (healthcare, delivery of blood, education) and there would need to be some thought given on how to either exempt some users or better yet help those businesses to acquire electric vehicles to carry out those essential tasks (like Bristol City Council has been able to do through the Go Ultra Low project – electrifying the Council fleet).

Both schemes should have exemptions for certain categories of road user, such as disabled people and charges should be allied with rewards for people who do travel sustainably (this can be through better infrastructure, discounted travel, salary sacrifice schemes for bus and train use etc).

### **Consistency across the four local authorities**

Transport policy and practice cannot ignore local authority boundaries. Whilst the BTS relates to the Bristol Council area only, its policies need to be applied consistently across the four West of England local authority areas. There either needs to be a sub-regional transport authority, or the four local authorities need to ensure consistency through the existing governance arrangements.

### **OUTCOME SPECIFIC COMMENTS**

The document emphasises the need for growth (in jobs and homes) and the need for reduction in car use. This needs better reflecting in the prioritisation of outcomes and investments/interventions.

#### **Manage demand on the network to ease congestion:**

##### **Outcome #1: Efficient movement of traffic around the city, with increased resilience of the network and minimised impacts of congestion on air pollution.**

Is outcome correctly titled/worded? It is more about demand management and reducing the number of vehicles using the network (or increasing the number of higher occupancy, more efficient vehicles on the network) and then ensuring that network is run as efficiently and is as resilient as possible. The reduced demand has to come first to enable the greater efficiency of the network.

We agree that some form of demand management measures will need to be introduced both to raise money to invest in infrastructure and to help change behaviour – both of which will help deliver reduce demand on the network. We would like to see greater integration of the planned clean air zone into the measures proposed, particularly how this will work alongside other demand management measures such as road user charging.

##### **Outcome #2: On and off street parking managed efficiently to encourage use of sustainable transport and tackle congestion, while providing options that support the city's 24 hour economy**

We look forward to the development of the parking strategy, and think all of the measures listed are required in order to rationalise the availability of parking in the city. The city does have an issue with bad parking behaviour (parking on pavements, in bus lanes, on segregated cycle routes) and these will need to be addressed as part of the parking strategy (perhaps this is included under enforcement?).

On street parking is a particular issue that needs to be addressed with a large proportion of the city's biggest asset (the highway network, as discussed on page 33) allocated to stationary vehicles. The city needs to ensure the most efficient use of the existing highway network on the arterial corridors, before adding additional capacity can be considered. We would therefore like to see red routes added to the proposed measures

for further exploration in the parking strategy.

On street EV charging will also need to be considered as part of this strategy (or another one?) especially around ensuring on street charging does not infringe on space used by pedestrians and cyclists.

**Enable people and goods to travel into and through the city more efficiently:**  
**Outcome #3: Reduced excess lorry and van travel in the city (especially during peak hours), working with industry to find cleaner alternatives for the movement of goods.**

We agree with the need to consider how the city reduces the number of heavy goods vehicles on our streets in order to protect vulnerable road users. We would support the introduction of enhanced freight consolidation for the central area, and local centres. Cycle logistics need to form part of the solution especially for last mile deliveries.

**Outcome #4: Public transport to be visibly integrated, convenient and reliable to enable people to move around the city in a more efficient way.**

We would like to see a greater commitment to making space available on roads to complete missing links in bus lanes. We need new bus infrastructure/highway improvements – the biggest barrier to buses is other traffic.

We would also like to see the provision of multi-modal interchanges, and the fact that any public transport stop or rail station has the ability to be a hub - enabling people to combine a walk, cycle, car-share or drive as part of a longer journey. We would therefore like to see facilities improve at bus stops for cycle parking, with improved walking zones to include measures such as improved wayfinding and convenient accessible crossings. We would like to see the promotion of the existing park and rides to include park and cycle, park and walk, or Park and Rail, rather than just bus.

**Make space and improve safety for movement by sustainable modes:**  
**Outcome #5: Walking to be safe, pleasant, accessible and the first choice for local journeys and combined with public transport for longer journeys.**

We welcome the measures set out in the walking outcome, particularly the walkable communities measure. If the city is going to meet the challenges through to 2036, then we must overcome the sometimes hostile environment that faces pedestrians immediately outside people's front doors. The measures that make a pleasant walking environment are as much about traffic speed and volume reduction as they are about some of the enforcement measures set out in this section. We would like to see more explicit reference to the idea of Core Walking Zones as set out in the Local Cycling and Walking Infrastructure Plan process - and for this to be linked better with outcome #12 (local centres).

**Outcome #6: Cycling to be safe, simple, accessible and convenient, either as an option for the whole journey or as part of a journey combined with public transport**

We welcome the inclusion of a network of cycling routes that is accessible to all, recognising the fact that not all people who can or could cycle are able bodied. We would like to see re-commitment to provision of a network for all ages and abilities. As for walking, the beginning and end of a cycle journey is likely to be from/to home. As a result residential areas need to feel safe and measures to reduce the speed and volume of traffic through neighbourhoods needs an explicit mention. Cycle parking at home is also a barrier to people considering starting to cycle, and we would like to see a city-wide roll out of the cycle hangars scheme for flats and terraced housing. We would recommend the replacement of the case study in this section to demonstrate how Manchester has kickstarted its Beelines programme from allocating Transforming Cities Funding.

**Outcome #7: A resilient, safe and well-maintained network to enable continuous movement of people and goods, using smart technologies.**

We welcome the re-emphasis of the safe systems approach to road safety underpinned by the removal of the risk to vulnerable road users through traffic volume and speed reductions. We also welcome the commitment to a multi-year maintenance programme which will enable integrated use of maintenance funds to achieve other outcomes. We would like the provision of safe, convenient crossings included here. We would also like to see better maintenance co-ordination across UA boundaries on key infrastructure like the B2B Railway Path and less reliance on volunteers to maintain the cycling network and more dedicated investment to do this.

**Encourage the use of sustainable modes and embed a sustainable transport ethos to help achieve our vision:**

**Outcome #8: More people making sustainable and healthy transport choices by improving engagement with communities, schools and businesses.**

We welcome the commitment to continue a range of behaviour change projects to inform residents and businesses of sustainable travel options. We would like to see a commitment to 'core fund' this activity either from Integrated Transport Block funds, or from pooled s.106 developer contributions, rather than the existing over-reliance on central government grant funding. We also welcome a commitment to engage with communities from the outset of a project - as this will deliver a greater sense of ownership of the problems and potential solutions available.

As an organisation that has been involved in the development and delivery of the LSTF, STTY and Access West programmes from the very beginning, North Bristol SusCom is acutely aware of the need for long-term commitment of behaviour change programmes. To date the lack of long-term planning has meant high turnover of staff and loss of expertise in this vital area.

As Director of North Bristol SusCom I am often the only person in the room that has

been around since the start of LSTF and regularly have to help UA colleagues build on and learn from lessons from the start of the programmes. We seem to start from scratch with each funding round instead of evolving and improving the programmes over time.

The programme for delivery behaviour change also needs to come from those involved in delivery and not bid writing teams who often focus on quantity instead of quality and real change.

**Outcome #9: New developments to be innovative in their approach to prioritise sustainable transport options and address the impact on the existing network.**

Given the scale of housing growth faced by the sub-region during the strategy period it is imperative that sustainable travel behaviour is embedded from the outset. This will mean ensuring all new strategic development locations are well served by public transport, are permeable for people walking and cycling and only enable access for vehicles.

**City Centre**

**Outcome #10: A city centre that is accessible by active and sustainable transport and attractive to live, work and visit, enhancing its status as the foremost shopping and cultural centre in the South West.**

We support the objective for central Bristol to be the cultural hub for the city, and the wider sub-region. In order for the city centre to be a high quality place where people move around on foot, bike and public transport, there needs to be an explicit mention of the need to reduce through traffic and manage demand of traffic entering the central area.

**Corridors**

**Outcome #11: More efficient transport corridors to move the largest number of people in the space available.**

There is an over-emphasis on projects that are long-term and high-risk that might preclude any interim measures being pursued on our arterial corridors. We recognise the space constraints on the arterial road network, but would like to see commitment to more radical long-term trials of alternative measure on key corridors such as dedicated bus lanes, removal of parking, installing segregated cycle corridors before commitments to expensive alternatives are made. Extensive monitoring of the impact of these types of trials would be needed to measure the impact both quantitatively and qualitatively - particularly for the uplift in people walking, cycling and using public transport, and traffic dispersal to alternative routes. We would like to see the inclusion of enhanced walking routes along the main transport corridors for at least 2km to/from the city centre.

**Local Centres**

**Outcome #12: Supported and enhanced local centres and high streets, recognising that they provide key services and facilities, and can also be transport corridors and destination points for visitors.**

**Outcome #13: Reduced impact of motorised traffic on local centres creating better public spaces that are more accessible by walking, cycling and reliable public transport.**

We welcome the focus on our local centres, as the heart of communities across the city. We would like to see an emphasis on the need to make all our local centres walkable and to create the link with the Core Walking Zones set out in the LCWIP. Local centres should first be walkable, with high quality public realm and pedestrian priority on the approaches through provision and widespread adoption of continuous footways. Secondly local centres should be well connected to the strategic cycling network and act as hubs for public transport provision.

**Neighbourhoods and Residential Streets**

**Outcome #14: Key facilities and services increasingly accessible to all citizens without the need to rely on a car.**

**Outcome #15: Safer places to live by working with citizens to design and deliver measures to improve movement and liveability in our neighbourhoods.**

Neighbourhoods are where the majority of all journeys begin or end, and as such a sustainable travel culture should start at home. We need to consider travel demand from the perspective of residential streets as well as access to the city centre. As such, residents parking zones should be considered in all areas of the city as well as the introduction of liveable, low-traffic neighbourhoods where vehicles can access areas, but not pass through. We welcome the opportunity for residents' groups to lead on the changes to their own streets, and consideration needs to be given to the mechanism through which this will be enabled. Community connectivity and social capital go hand in hand, and are directly linked to the volume of vehicular traffic on our streets. As such we would like to see a greater emphasis on the place function of our residential neighbourhoods with better promotion of schemes such as Playing Out to improve community ties and resilience especially for younger and older generations who are more at risk of isolation at home.

This outcome alongside the 2050 carbon neutral target should be the underpinning of all other objectives and should be reflected and emphasised to a far greater extent in the vision section of the document. This is the outcome against which all other outcomes should be measured.

**Conclusion**

The Bristol Transport Strategy introduces a step change in language and priority for sustainable transport measures. This is very welcome but needs to be better reflected in the prioritisation of outcomes with greater emphasis on walking,



cycling and clean public transport as the key solutions to current our current and future transport challenges.

We'd also like to see a Transport Plan developed for Bristol – this may emerge as part of the JLTP 4 development as some outcomes in the BTS will sit better at a sub-regional level and some at the Bristol level. A Plan would provide the additional clarity needed around delivery of the Strategy.

Yours Sincerely

A handwritten signature in blue ink that reads "Ann O'Driscoll".

Ann O'Driscoll  
Director