

Transport South West Network

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14th Feb 2012

RESPONSE FROM SOUTHWEST TRANSPORT NETWORK (837) TO BATH AND NORTH EAST SOMERSET CORE STRATEGY Schedule of Rolling Changes February 2012

We are writing in response to the consultation on CD6/E2.2, Schedule of Rolling Changes to the BANES Core Strategy.

We object to the changes to the transport section that relate to lorries and air pollution because they make reference to a lorry ban in Bath as an example of how HGVs will be dealt with:

ii) by implementing an experimental weight restriction to remove through HGV traffic (of greater than 18 tonnes) from London Road.

We consider that the incorporation of this text in the Strategy would be inappropriate. Its inclusion in the Local Development Framework in any form pre-empts and pre-judges a complex situation which has still to be resolved. Specifically:

(a) The Highways Agency has real reservations on the matter. The A36/A46 is the North-South Trunk Road in the sub-region. See letter enclosed.

(b) Adjacent authorities have not been properly consulted on the ban; Wiltshire has already shown strong opposition. Wiltshire Council still contests the BANES report on how the ban would work¹ and is concerned about the impact on its own communities, many of which have too many very large lorries travelling through them already. Such communities include Westbury (lorry route through town centre and AQMA), Bradford on Avon (narrow streets and AQMA), Trowbridge, Melksham, Atworth etc.

(c) Wiltshire seeks in its LTP3 specifically to reduce the impact of HGVs on its communities.

(d) The Wiltshire and Swindon Freight Quality Partnership is very much opposed to the ban – see

¹BANES have indicated some 335 HGV's (18 hr 2 way weekday flow) in excess of 18 tonnes would be deflected by the ban, many of these going to and from Dorset, Southampton, Somerset, and parts of Wiltshire. BANES for many years actively supported the A350 Westbury Bypass on the basis that the city could send their lorries through Wiltshire instead of Bath. The Westbury Bypass was turned down by the government in 2009, following a full planning inquiry. Following that, BANES changed their tune and suggested that only 2 lorries a day would be diverted down the A350 in their 2011 report (see Figure 1). An officer from Wiltshire Council said at a meeting about the lorry ban at Westbury Area Board in 2012 'we don't believe your figures'.

letter enclosed.

(e) The lorry ban for Bath is not in the *Joint Local Transport Plan* covering the four West of England Authorities – no mention is made of it. The stated policies are associated with a switch to rail freight and freight consolidation centres.

(f) The map showing 'diversionary routes' with the lorry ban in place (Figure 1) would affect many other authorities (eg in Bristol, South Gloucestershire, Radstock, other parts of Bath etc.). Meanwhile these routes are in conflict with the routes suggested by the Highways Agency when the A36/A46 route was closed near Bath by road works, and indeed some of the routes suggested by BANES for large HGVs are shown as only 'for light vehicles' by the HA (Figure 2).

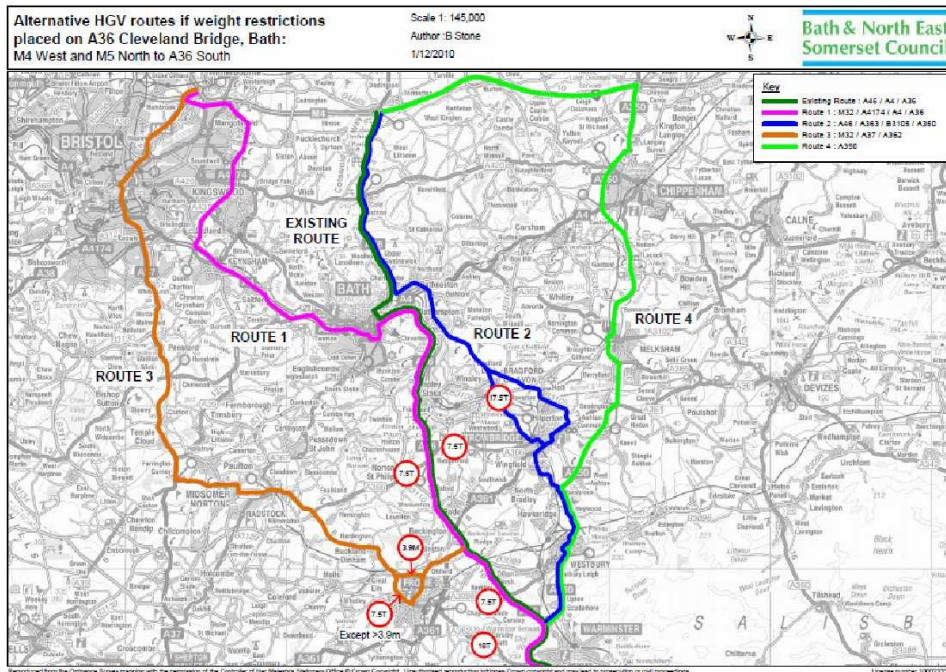
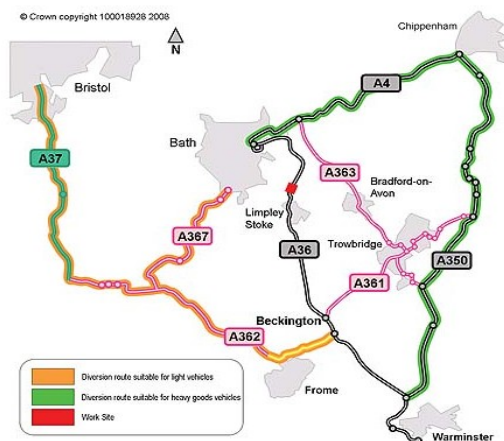


Figure 1 (above) BANES suggested routes for lorries diverted by the weight limit in Bath

Figure 2 (below) Highways Agency suggested routes for lorries diverted by the closure of the A36 at Limply Stoke in 2007.





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Our ref: KJH/FS7/11

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28th July 2011

Dear Cllr Symonds

Re: 18 tonne weight restriction on the A36 Bathwick Street and A36 Beckford Road in Bath.

At the last Wiltshire and Swindon Freight Quality Partnership (FQP) meeting held on the 30th of June, the members of the FQP indicated that they unanimously 'Oppose' any action with regard to these restrictions being placed without suitable supporting evidence and wished their opposition to be noted by the submission of this letter.

The FQP are of the opinion that the evidence currently provided by Bath & North East Somerset Council (B&NES) is not robust enough to support any decision to implement the proposed experimental order. In particular, the methodology used to redistribute HGV's on to alternative routes is obviously too simplistic in that it only considers differences in distance and takes no account of factors such as route topology, traffic congestion or fuel consumption. As a result, the proportion of HGV's estimated to be redistributed to alternative routes in Wiltshire is very low and considered highly unrealistic.

Whilst the FQP acknowledges that an experimental traffic regulation order would allow the impact of any weight restriction to be monitored on alternative routes before a final decision is made by B&NES Council, it should not be implemented in the dark. There is also the issue that, regardless of adverse impacts on alternative routes, you will find it difficult to return to the status quo if people in Bath perceive any positive impacts. Furthermore, in applying this course of action without reasonable evidence and consultation it could be that B&NES Council are somewhat at risk of sabotaging what are considered good sub-regional working relationships.

It would appear that B&NES Council officers have failed to offer anything approaching a decent analysis of the likely consequences of the possible weight restriction. B&NES Council have indicated that a round of consultation prior to the introduction of the restriction would be undertaken, but having attended a consultation event as part of this process, I would suggest that the modelling that would be required to predict the consequences of such a restriction has not been undertaken and this would prove a barrier to healthy consultation and dialogue.

This coupled with a statement from Wiltshire Council officers that information requested as part of an FOI request for further evidence was met with a refusal from B&NES Council officers seems to reinforce a somewhat disingenuous attitude from B&NES Council and suggests that the scheme is a 'fait accompli'. The FQP feel that applying this restriction on an experimental basis and claiming that the evidence will be provided in this manner could cause wider implications and is not conduct expected from modern highway authorities.

Wiltshire & Swindon
Freight Quality Partnership 

In conclusion, I would like it to be known that the Wiltshire and Swindon FQP feel that B&NES Council should be more transparent in what such a restriction will actually achieve and have the evidence so that constructive consultation can take place. Without such evidence, bodies such as the FQP can only oppose such schemes until the appropriate detail can be provided that reveals the potential benefits and effects upon individual routes, cities, towns, counties and regions.

Yours sincerely



Ray Conneely
Chairman
Freight Quality Partnership for Wiltshire & Swindon



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29 November 2011

Dear Peter,

**A36 CLEVELAND BRIDGE BATH-PROPOSED EXPERIMENTAL 18 TON WEIGHT
LIMIT:
IMPACT ON STRATEGIC ROAD NETWORK**

I write with reference to the above proposal for an experimental order on the A36 within the confines of the City of Bath that was tabled and passed at a Bath and North East Somerset Cabinet meeting on 14th September 2011.

At a meeting between the Council and Agency officers in March 2011, our fundamental objection to the scheme were clearly registered on the basis that the proposal would result in a discontinuity of the strategic southern route for commercial traffic with a resultant significant diversion. Other concerns included the potential impact on the Agency's operational capability, the increase in HGV traffic on the congested M5 link between junctions 18 & 19 and the M32 junction 1, and the quality and ambiguity of the information and instructions to be given to our customers as they follow the well established route south and find it is no longer available to them.

Following our meeting and a clear recognition of the Agency's position, your officers were due to report back on several points of concern. To date, despite chasing, this additional information has not been forthcoming.

You can therefore understand my surprise and concern to discover that this proposal had been approved by your council. Furthermore there is no mention that the Highways Agency had any concerns or had even been consulted.

While I understand this link is, for historic maintenance reasons, in the control of your authority and that there are environmental issues you wish to address within the locality, this section still forms part of a wider strategic route for north/south transport movements. Given its importance to the strategic network and by default the UK economy, a measure such as this needs to be considered carefully and should ideally be supported by a clear strategy for the movement of freight around Bath. To this end can I please ask what dialog has been held with other affected parties such as Wiltshire,

South Gloucestershire, Road Haulage Association and the Freight Transport Association to establish the potential impact and consensus opinion of the proposed measure. Under the Traffic Management Act it is incumbent upon us all to work together in ensuring the safe and effective movement of traffic.

I assume that South Gloucestershire Council and the police have been consulted and would welcome sight of their responses along with the details of the experimental order

For the avoidance of doubt I can confirm that the Highways Agency's position has not changed. We consider the proposal to be detrimental to the function and operation of the Strategic Road Network and that there is no coherent strategy to support the reallocation of freight movements

Given all of the above, I would urge you to reconsider your decision and trust this clarifies the Agency's position for your members.

Yours sincerely

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