

## **Bath & North East Somerset Placemaking Plan**

### **COUNCIL'S RESPONSE TO ID/3: MATTER 15 – TRANSPORT, INFRASTRUCTURE AND DELIVERY**

***Issue: Whether the necessary infrastructure to support the Bath spatial strategy will be delivered.***

**Q1. Does the Infrastructure Delivery Plan demonstrate that the key infrastructure required to achieve the proposed development can be achieved without compromising the timely delivery of development?**

1. The Council is of the view that the Infrastructure Delivery Plan demonstrates that the infrastructure required to achieve the proposed development can be achieved without compromising the timely delivery of development. The overall response to the delivery of infrastructure is discussed in Matter 8 – Infrastructure.
2. The key infrastructure items identified at the time of the Core Strategy examination are shown in Table 2 / Page 140 of the Bath chapter (Part 2) of the Placemaking Plan. Of these the following comments are made:
  - The Bath Transport Package has now been completed and the three existing park and ride sites have been expanded and are now operational
  - The improvements to flood defences of Bath City Centre are now under construction as part of the Bath Quays project
  - Bath Western Riverside is currently under construction, with a considerable number of dwellings completed, including affordable housing partly delivered by the Homes and Communities Agency
  - Improvements to Bath Train Station have been completed by Network Rail and through the Southgate development. Enhanced service frequency will occur once the mainline is electrified in 2017, and MetroWest phase 1 is implemented with a new hourly service between Bath Spa and Severn Beach via Bristol Temple Meads.
3. Additional infrastructure requirements are discussed in the Placemaking Plan and the IDP. These will be funded in a variety of ways as described in paras 2.25-2.43 of the IDP. Delivery of an east of Bath Park and Ride is discussed below.

#### **Policy ST6 – Park and Ride**

**Q2. Are the traffic management proposals referred to in Policy ST5 reliant on the expansion of existing Park and Ride facilities and the provision of a new Park and Ride to the east of Bath?**

4. Traffic management proposals for the central area of Bath referred to in Policy ST5 would not be reliant on the expansion of existing Park and Ride facilities and the provision of a new Park and Ride to the east of Bath. This is because, whilst embracing the objectives set out in Policy ST5, there is no expectation that any scheme would radically reduce, or seek to reduce, the existing capacity of the central area road network within Bath. However, these traffic management proposals will not be capable of improving the capacity of the City Centre network to any significant degree either, as the opportunity to do so is highly constrained. As areas of this network are regularly congested with at/over-capacity operating conditions now, there would therefore be little or no opportunity to accommodate significant growth in car traffic into the central area. This fact is recognised in the S-Paramics modelling work done to identify the transport impact of various land use scenarios associated with the Enterprise Area ((Core Document **CD/PMP/B21**: Technical Report 'Bath Enterprise Area/Transport Strategy - S-Paramics Modelling', CH2M November 2014).
5. The modelling work referred to above included consideration of expected traffic management changes in the Bath central area. Improvements to the A36 Lower Bristol Road/Windsor Bridge Road junction (Infrastructure Development Plan (IDP) Ref: BI.30c) and the A36 Rossiter Road scheme have led to modest capacity improvements at best, whilst the on-going highway works to Corn Street, Green Park Road and The Ambury as part of the flood conveyance scheme in the Avon Street area will not alter available capacity despite the removal of a section of Green Park Road (IDP Ref: BI.30c and Policy SB4). Beyond this, most of the planned network changes in the central area are linked to planned development delivery, notably Bath Western Riverside (Policy SB8), Manvers Street (Policy SB3), Sydenham Park (Policy SB7 and IDP Ref: BI.31) and the former MOD site at Warminster Road (Polly Sb12 and IDP Ref: BI.28a). As noted above, the development of the detailed vehicular access arrangements for these sites will be expected to demonstrate that existing highway capacity is not compromised, notwithstanding any measures taken to limit or constrain vehicle trip generation associated with the developments themselves through on-site parking controls and so forth.
6. In summary, the traffic management proposals for Bath will seek to 'hold' or maintain the existing capacity of the highway network but not increase it to any notable degree. As such, they are not expressly dependent on a wholesale removal of existing car trips to Park and Ride or other modes to make them viable and acceptable. However, the existing central area network will cater for very limited traffic growth going forward, and it is equally the case that the traffic management changes proposed will not alter this position.

**Q3. Is provision of an East of Bath Park and Ride justified?**

7. The Council has a long standing policy of developing and expanding its Park and Ride facilities to give those who can't access public transport a convenient way of getting into and out of the city without the use of the car. The original Park and Ride sites were brought in with associated demand management measures. This was focused on the introduction of Residential Parking Zones which removed some 3,000 long stay on-street parking spaces and the reduction of off-street parking spaces within the centre of the city. This policy is continued in the 'Getting Around Bath' Transport Strategy.
8. The Council's Park and Ride sites are successful and financially sustainable. The lack of a Park and Ride site east of the city restricts access from the east along the congested London Road. Recently the Royal United Hospital (RUH) has expressed support for a Park and Ride site to the east of the city, and indicated they would welcome a dedicated bus service from such a site to help staff and visitors access their facilities.
9. The Council's most recent consultation on the options of a Park and Ride east of the city outlined the objectives of this particular facility, which are:
  - a. To reduce congestion within the city and around our off-street car parking sites (which we hope to redevelop);
  - b. To improve the city's environment;
  - c. To reduce car use into the city centre and improve the proportion of journeys made by public transport;
  - d. To reduce carbon emissions from transport;
  - e. To support the city's economic development and Enterprise Area; and
  - f. To improve connectivity to support business and growth of the wider region.

The Council fully recognises the environmental constraints to the east of the city and, in deciding which site(s) to promote to support these objectives, will have to balance the very real benefits and popularity of Park and Ride facilities against the harm caused by the development of particular sites. The Council has in the past granted planning permission on two occasions for a Park and Ride facility on different sites to the east of the city.

10. Transport Evidence Explanatory Note 2 'Bath - Park and Ride Expansion' (Core Document **CD/PMP/B27**) outlined the case for expanding the Park and Ride facilities around Bath, referencing the patronage forecasting work done to identify the usage impact of including a new site to the east of the city or not (Core Documents **CD/PMP/B22** and **CD/PMP/B26**). With no new site to the east of Bath, the expected maximum parking demand across all three existing sites in 2029 was predicted to be 2,899 spaces so, in effect, a full take-up of all existing capacity with some additional demand warranting a need for local expansion. With

an eastern site added the predicted change was shown to be dictated to some extent by the actual location within the eastern corridor and, as noted earlier, whether the service route offered were to include an extension to the RUH. With the addition of a site close to the western end of the Batheaston Bypass, the overall demand for Park and Ride was estimated to require a need for 3,422 spaces with a service route operating as far as the City Centre only. With an extended service to the Royal United Hospital (RUH), the forecast maximum demand increased to 3,732 spaces. This indicates that the addition of a site to the east would encourage further use of Park and Ride by virtue of having a site in the right place and deemed convenient to car users accessing the city via routes in the eastern corridor, namely the A4 Box Road and the A363.

11. It is important to note that the 'Do Minimum' forecasting work without an eastern Park and Ride did not arbitrarily constrain the capacity of the existing sites. In other words, users choosing to use an eastern site if available were not prevented from using one of the existing three sites. Whilst some of the predicted user demand for an eastern Park and Ride site was shown to be making use of Lansdown Park and Ride in the 'Do Minimum' case, the difference in the overall demand clearly demonstrates that re-routing to the Lansdown site is unlikely to be a deemed a convenient option for many car drivers routing into Bath from the east. The Odd Down site to the south of the city is similarly inconveniently placed to encourage much diversion from the eastern routes into Bath.
  
12. The results from the patronage modelling clearly showed that the provision of a new Park and Park site to the east of Bath would serve to promote and encourage a greater use of this mode than would otherwise be the case with limiting expansion to the existing sites. This will be very important in seeking to control traffic growth in Bath in the future with the expected added demand for car-based travel linked to developments in the Enterprise Area (EA). Modelling work undertaken to understand the likely impact of the EA (Core Document **CD/PMP/B21: Technical Report 'Bath Enterprise Area/Transport Strategy - S-Paramics Modelling'**, CH2M November 2014) concluded that the central highway network in Bath could accommodate little more than 3-4% growth in existing traffic in the peak time periods without unacceptable levels of congestion occurring. This work looked at a level of expansion over and above the existing Park and Ride capacity, and the degree to which this could be effective in catering for EA generated traffic and reducing existing traffic, with the aim of maintaining this threshold. It was clear that reliance on 'typical' weekday spare capacity shown to be available at the existing Park and Ride sites in 2014 would not do enough to reduce vehicle demand, even allowing for expected rail patronage growth at Bath Spa/Oldfield Park stations with the Great Western Main-line (GWML) electrification/Metro-West improvements and increased walking/ cycling in line with the observed 2001-2011 Census growth trend.

13. It should further be noted that the acceptable average traffic growth figure arising from this work does not imply that all roads have this degree of spare capacity. The A4 London Road is arguably the most congested radial route into/out of Bath, with negligible potential for traffic growth in the peak periods. The Cleveland Place junction is a key existing 'bottleneck' on this route, and the Bathwick Street approach to these traffic signals experiences slow-moving and queuing traffic for most of the working day. Without 'focused' measures to reduce existing traffic pressure along the A4 London Road corridor as would be achieved with a Park and Ride to the east of Bath, it is difficult to see how the additional travel demand generated by the EA from this direction will be otherwise accommodated.

**Q4. What alternative options to the proposed East of Bath Park and Ride have been considered?**

14. Given the distribution of both commuters and visitors to the city of Bath, as illustrated by the 2011 Census and more recent surveys undertaken by the Council<sup>1</sup>, it is clear that a Park and Ride is an important element of an integrated strategy to help people get into and out of the city. Park and Rides are sustainable interventions not only in reducing car use within the city of Bath but also increasing the catchment of the City by allow those who cannot make these journeys by bus or train to transfer to public transport at an early opportunity towards the edge of the city.
15. The alternatives to a P&R east of Bath are:
- a new railway station as an alternative to a bus based P&R
  - Continuing to encourage transfer to existing bus services
  - Support for improved rail services.
16. However, none of these options would provide an attractive alternative to the majority of fragmented and scattered locations to the east of the city, where the majority of workers and visitors live.

**Q5. Is it appropriate to defer any decision on a suitable location for a new park and ride facility to the submission of a planning application?**

17. Paras 6.22 - 6.25 set out an overview of the position regarding the provision of Park and Ride facilities around Bath. Para 6.25 explains the purpose of Policy ST6 - that it is a criterion based policy which is intended not only to be used to consider planning applications for new Park and Ride facilities but also for those for extensions to existing facilities. Whilst the NPPF states that *local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice* (para 41) this must be taken in the context that a suitable located and deliverable site has been identified.

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<sup>1</sup> See Appendix 1

18. The Council has in the past granted planning permission on two occasions for a Park and Ride facility on different sites to the east of the city. However, given the need to carefully balance the benefits of a Park & Ride facility and the environmental and other impacts of developing specific sites further work has been undertaken assessing various site options. Whilst a proposed site has not been identified the Council continues to make good progress in this regard. The Council is expected to consider the options for a site(s) during the Autumn following a more detailed review following the work reported to the Cabinet in May 2016.
19. The supporting text makes it clear that in accordance with the NPPF local transport infrastructure which can demonstrate a requirement for a Green Belt location is not inappropriate in Green Belt, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. In the strong likelihood as set out above that a site in the Green Belt becomes the most suitable location for a surface level Park and Ride facility to the East of Bath the Council considers it entirely appropriate to consider such a proposal within the context of Policy ST6.

**Q6. Will policy ST6 be effective – does the policy wording reflect the need to balance competing considerations?**

20. The Council is confident that Policy ST6 is an effective policy. The purpose of the policy is outlined above in the response to Q.5. The criteria included are those considered key in evaluating Park and Ride proposals for Bath. The benefits of providing an East of Bath Park & Ride facility are outlined above and the Placemaking Plan confirms the Council's policy to develop such a facility. In this context the policy is positively worded with enough flexibility to ensure that competing considerations, primarily relating to the highway network and environmental harm, of specific sites/proposals can be balanced in the decision making process. A minor change to the policy as set out in the pre-submission Draft Placemaking Plan is proposed (see CD/PMP/G3) in response to concerns raised by Historic England to ensure that the impact on all heritage assets is considered. Policy ST6 is compliant with national policy and will be used in conjunction with other relevant policies (from the NPPF, Core Strategy and Placemaking Plan) and decisions made in the context of all other material considerations. As the final sentence of the policy makes explicit: *Applicants will also be required to demonstrate that the scheme complies with all other relevant national and local planning policies that affect the site and its location.* See also response to Q5 above.

**Policy ST7 - Parking strategy**

**Q7. Are proposed parking standards justified and consistent with national policy?**

21. Bath and North East Somerset's existing Local Plan (adopted 2007) currently sets out the maximum car parking standards required for new development proposals reflecting previous national planning policy set out in PPG13 (Transport). The policy of restricting the level of parking provision particularly in new residential developments, has promoted less reliance on the motor vehicle and a move to more sustainable and healthy methods of travel, particularly for shorter journeys.

22. In January 2011, the Coalition Government announced its intention "to end the war on motorists". One of the three elements of this announcement was the removal of national limits on residential parking. Local authorities are still required to set parking standards for their areas, but they should do so having regard for local circumstances and without trying to control car ownership. The need however to promote sustainable transport outcomes is not affected. The Government has concluded that national constraint policies have led to:

*"significant levels of on-street parking causing congestion and danger to pedestrians".*

In preparing new policies, local authorities are being urged:

*"to make the right decisions for the benefit of their communities"*

23. The National Planning Policy Framework further reflects this approach to parking by referring to both residential and non-residential development, leaving it to local authorities to decide whether there is a need for parking standards by advising:  
If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

24. The Department for Communities and Local Government (DCLG) issued a statement on 26 March 2015 regarding the setting of local parking standards, to be read alongside the NPPF. This states that:

*"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."*

25. There currently exists a clear and compelling justification for introducing a prescribed parking standard for Bath based upon:
- Poor air quality
  - Existing congestion levels within the city, and
  - Overspill parking from new developments on the outskirts of the city that require the authority to introduce controlled parking zones and more enforcement
26. This approach is also supported by the recently adopted Bath Transport Strategy which states that:
- “additional parking in the core of the city is not really an option because space is scarce and more traffic would be undesirable.”*
27. The specified parking standards for residential and non-residential development are justified within the Bath City Centre Zone as any development located in this zone is within a reasonable walking distance of key services and facilities, and is in the most accessible location within the Council area. The development will therefore benefit from a range of travel options. Such an approach is consistent with current transport and planning policy which seeks to direct development to the most sustainable locations, reduce the intrusion of vehicles in the historic core of Bath and protect the World Heritage Site.
28. The non-residential parking standards for the Bath Outer Zone of Bath are a set of maximum parking standards. It is widely acknowledged that restricting parking at the origin of a journey is less effective than restricting parking at the destination. Therefore an important contribution to reducing traffic growth and congestion can be made by local authorities using their development control powers to limit the amount of parking associated with new business premises. The standards strike a balance between allowing proportionate and complementary parking provision in new developments whilst at the same time not discouraging businesses from locating or expanding in Bath or potentially transferring unmet parking demand onto residential streets.
29. Inside the Bath Outer Zone minimum parking standards apply for residential parking. Previous parking policy to reduce car travel through reducing availability of parking at both the origin and destination has not worked at the point of origin, therefore vehicle parking standards need to be increased, along with sustainable transport measures. By changing the origin car parking standard from a maximum to a minimum it is intended that appropriate parking facilities will be provided.
30. For non-residential developments outside the City of Bath parking requirements will be determined on an individual basis (i.e. a case by case basis). This approach reflects the position that the Council are best placed to take account of local circumstances and are able

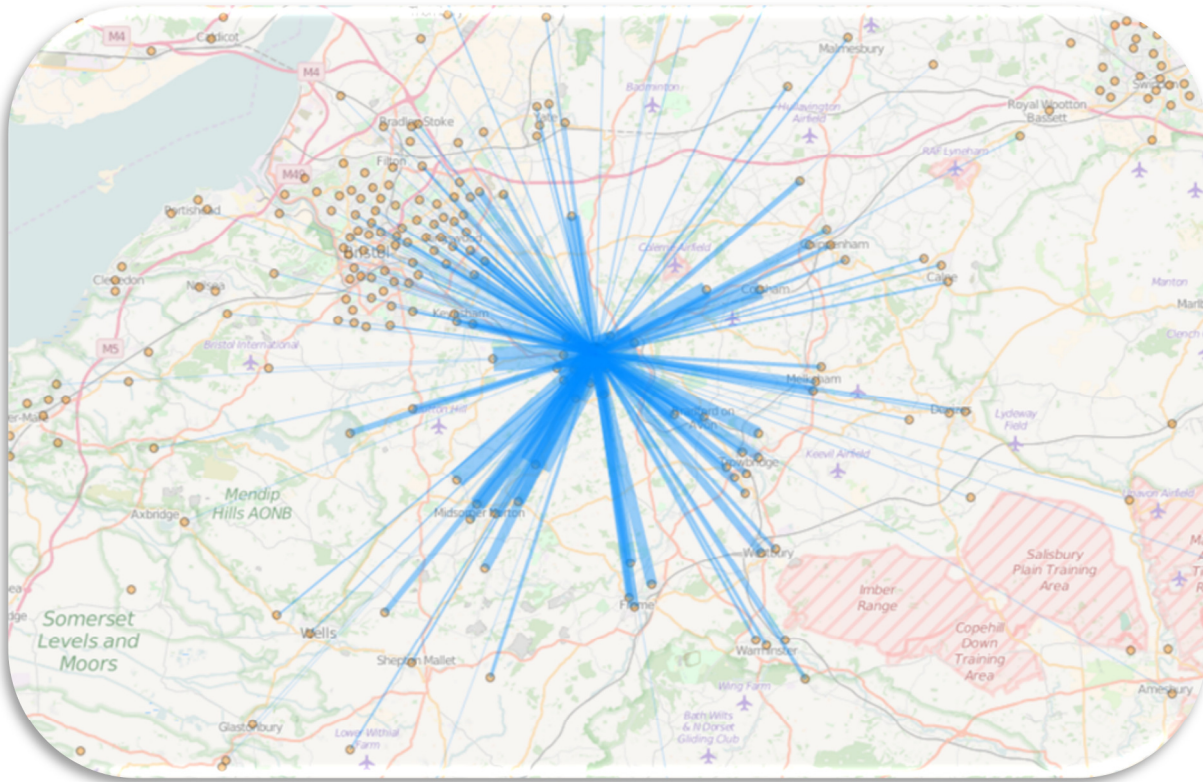


to make the right decisions for the benefit of their communities, as opposed to these being dictated through national guidance and policy.

31. Similar to the approach for the Bath Outer Zone, for residential development outside the City of Bath minimum parking standards will be applied. This approach for residential development, based on minimum parking standards allows more flexibility as the Council will still be able to negotiate higher levels if deemed necessary. This is in contrast to the existing maximum parking standards in the current Local Plan that don't allow for any flexibility upwards in parking provision. By changing the origin car parking standard from a maximum to a minimum it is intended that appropriate parking facilities will be provided preventing potentially the transfer of unmet parking demand onto residential streets.
  
32. The prescribed parking standards need to be considered in a sensitive and flexible way that reflects local circumstances. In light of this the parking standards laid down in the Placemaking Plan remain flexible through the application of an accessibility assessment which will be completed by the developer and will assess the actual site in terms of local accessibility to non-car modes of transport. The questionnaire will result in a development being scored on the basis of the current level of accessibility it has to non-car modes of transport. The score will enable the site to be assessed as having low, moderate, high or very high local accessibility. This score will then be translated into a discount from the prescribed parking standard. The use of accessibility levels as a basis for the departure from specific parking standards is now an established policy among many local authorities.

Appendix 1

2011 Census travel to work in Bath by Car



2015 Survey of origins of P&R users

