



Bath and North East Somerset Placemaking Plan
Matters and Issues for Examination
ID/3A Rev1

Matter 15 - Transport, Infrastructure and Delivery

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

Ref no. 224

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Note: Bath Preservation Trust has benefited from the analysis undertaken by Andrew Lea, for Bathampton Meadows Alliance. Some of these data inform our answers to these questions. BPT's position remains that the balance of public benefit vs harm to the environment has not been adequately demonstrated in relation to ANY east of Bath Park and Ride, but in particular for the sites actually brought forward to date, nor have there been any genuine mitigation proposals for any of the proposed sites which makes the benefit vs harm equation difficult to assess.

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?*

- 1.1 There is significant risk that an east of Bath P&R as currently conceived by the Council may not be delivered. The council refers to a risk register in all reports about this project, but has not made it available to the public or Councillors.
- 1.2 The Council is considering two large sites on Bathampton Meadows and a number of smaller sites on Box Road. All are within the setting of the World Heritage site, the Green Belt, and would impact on the Cotswolds AONB. Additionally;
 - a) Only site F is owned by the council, any other site(s) would need to be acquired.
 - b) Both sites on Bathampton Meadows have cost estimates above the £10m allocation (site B £8-10m, Site F £7.3-11M)¹
 - c) Sites on Bathampton Meadows cause major concern due to visual impact and the potential for flooding².
 - d) Traffic and emissions are rising to the east of Bath. A P&R here may cause emissions to exceed EU limits. A planning authority must refuse permission under these circumstances.³
 - e) Public concern is evidenced by consultation having resulted in 51% against an east P&R; there is a 12,000 name petition against the proposal and a fund has been set up to raise money for judicial review

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?*

- 2.1 None of the traffic management proposals in Policy ST5 are reliant on the expansion of P&R facilities including to the east. Conversely most of the proposals would not be met by P&R;
 - a) P&R does not address through traffic. Traffic can be removed from the main shopping streets by measures other than P&R such as pedestrianisation.
 - b) The council has not demonstrated that P&R increases vitality and viability
 - c) Improvements can be made for pedestrians, cyclists and the mobility impaired without P&R. Indeed P&R has the potential to divert resources that could be aimed

¹ Appendix 4 of LFD report to cabinet 4th May 2016

² LFD report to cabinet 4th May 2016

³ Bathampton Alliance Report to Scrutiny March 2016

at such measures. People who have impaired mobility rely on buses if they do not drive, but P&R threatens the viability of other bus services by abstracting passengers from these services.⁴

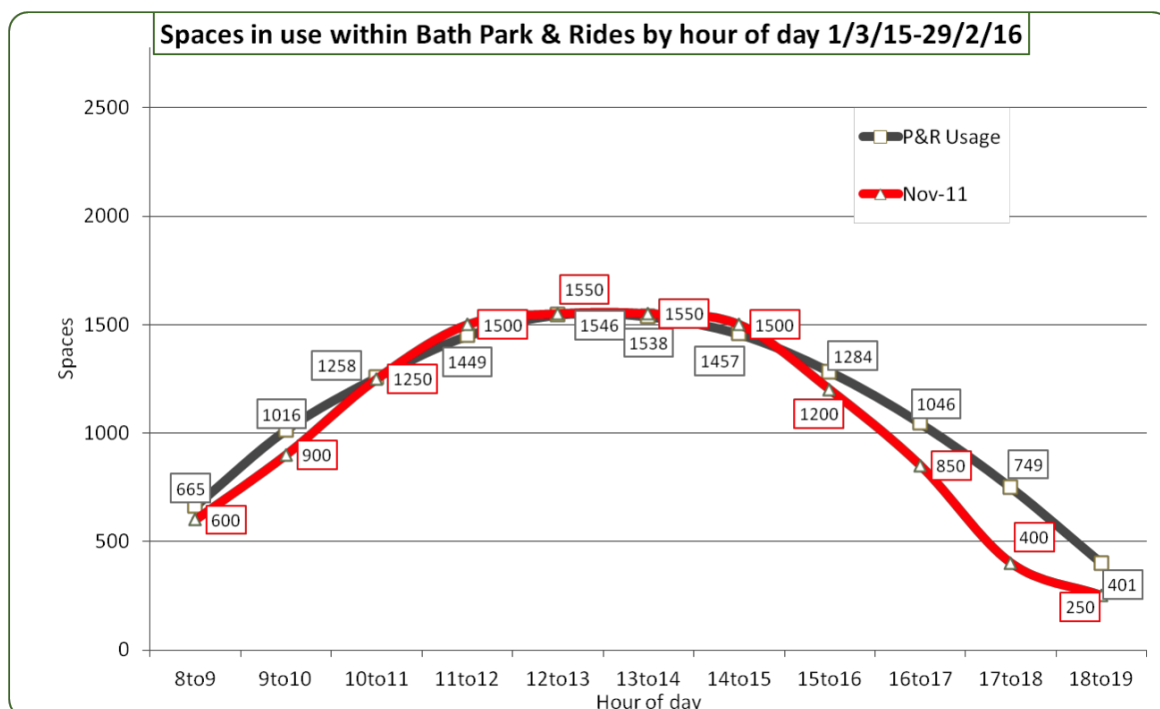
- d) The improvement of public transport integration can be facilitated without P&R which only integrates private transport with specific public transport.
- e) The needs of the motorist in Bath are being met over and above the needs of other road users. Prioritising P&R risks excluding non-drivers (including the elderly, disabled, poor and young people) from facilities enjoyed by others.
- f) Improving air quality is not dependent on P&R. DEFRA no longer suggest P&R as a measure for improving air quality, this has been removed from their latest guidance on Air Quality published in February 2016. P&R's increases Vehicle Kilometres Travelled (VKT) and so create more congestion and emissions on the periphery of urban areas where they are located.⁴
- g) P&R to the east of Bath has the potential to harm the quality of the historic, environmental and cultural assets. The sites under consideration are all within the setting of the World Heritage Site with the two favoured sites being on Bathampton Meadows. Bathampton Meadows contribute many of the 'attributes', both natural and built, that give meaning to the World Heritage City. Damage to these attributes impacts upon the Outstanding Universal Value of the city of Bath. They are also highly visible and harm is, therefore, proportionately more difficult to mitigate against.

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

- 3.1 The provision of an east of Bath P&R has not been justified. The existing P&R sites are underused. The council has not monitored the effects of P&R and has no evidence that the existing P&R sites have done anything to reduce traffic or emissions in the city. Neither have they demonstrated clear demand from the east as distinct from the North to capture motorway traffic.
- 3.2 The Council has disregarded its own parking data collected automatically by sensors on the exit and entry barriers for Bath's main car parks. This data is publicly available and has been analysed by Andrew Lea of the Bathampton Meadows Alliance. The study covers an entire year from March 1st 2015 to February 29th 2016 and has not been challenged by the council.³ This analysis shows that;
 - Existing P&R sites are on average only 41% full.
 - At the busiest time of day, maximum occupancy is on average 57%.
 - By 9am, when congestion is at its worst, P&R is only 24% full.
- 3.3 P&R does not attract the commuters who must be extracted from the network if congestion and emissions are to improve. The council has not shown how P&R can attract commuters in the future when it does not do so today.

⁴ Zijlstra, Vanoutrive and Verhetsel (2015) A meta-analysis of the effectiveness of park-and-ride facilities, European Journal of Transport Infrastructure Research, issue 15(4) pp 597-612

3.4 Demand for P&R has not increased over the last 5 years. A survey in 2011 used in a background document to the Transport Strategy showed 1550 spaces used at the busiest time of day. The annual usage figures for the 12-month period to March 2016 show 1546 spaces used at the busiest time of day.



3.5 In 2015, an additional 248 P&R spaces were provided at Newbridge, but after a full year of operation P&R usage across all 3 sites had only increased by 19 cars on average a day.³

3.6 P&R sites only reach capacity when there are predictable events that could be managed with more buses, trains and overspill parking. Between 1st March 2015 and 29th February 2016, capacity levels reached 100% on 21 days at one or more P&R sites at some point in that day. There were 19 days when average P&R capacity exceeded 80%, of these 19 days, 17 coincided with the Christmas market.³

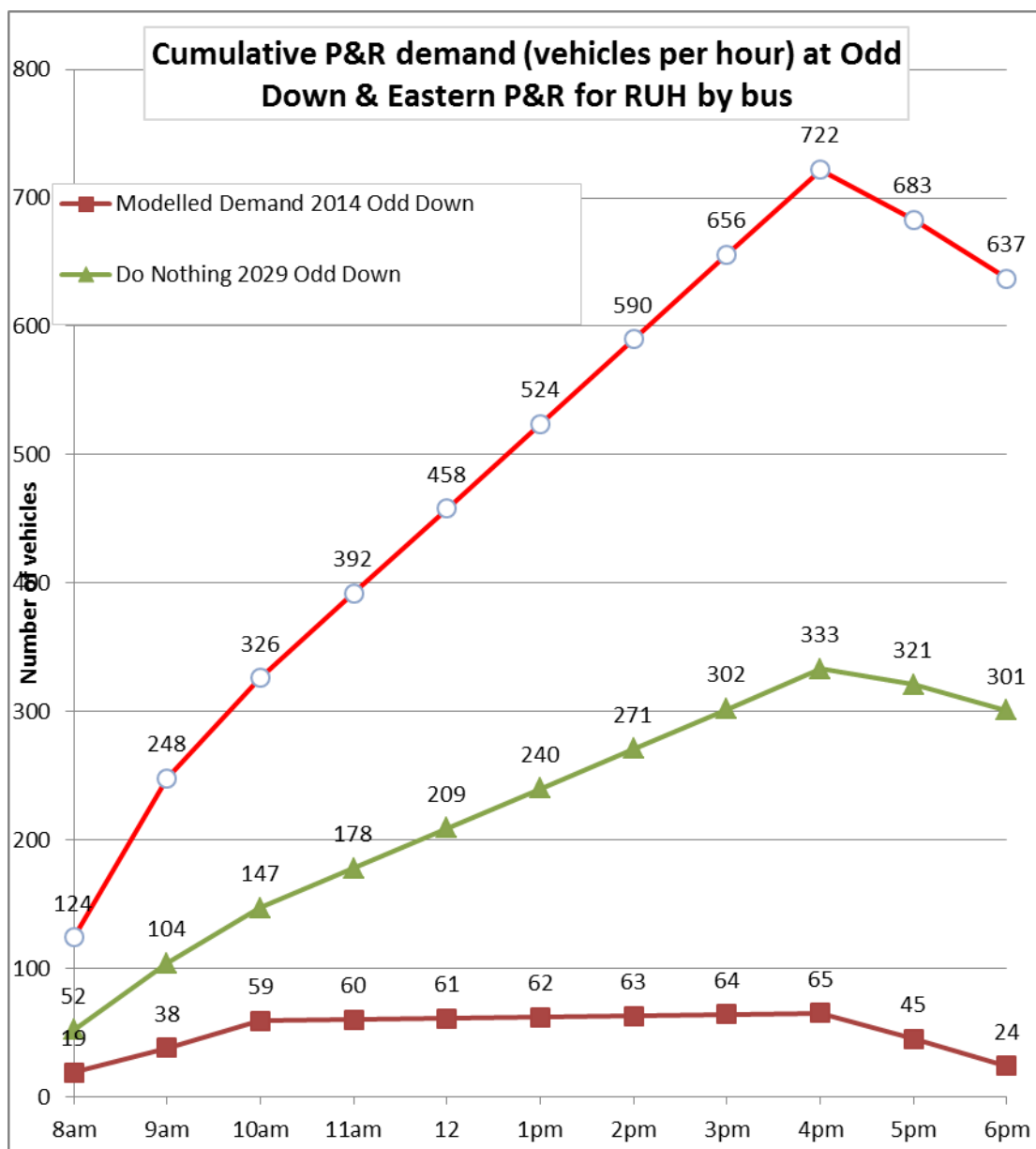
3.7 The Infrastructure Delivery Plan at 21.4 states that ‘many trips originate in the east’ but this has not been quantified or evidenced other than by 2011 Census figures, which includes people employed by the MoD at Bathampton before closure. The only comprehensive study of trip origins in Bath was conducted by academics. They found ‘virtually no demand’ for P&R from the area to the east of Bath and that only around 10% of drivers parked at city centre car parks had origins in this sector.⁵

⁵ William Clayton, Eran Ben-Elia, Graham Parkhurst and Miriam Ricci: (2014) Where to park? A behavioural comparison of bus Park and Ride and city centre car park usage in Bath, UK; Journal of Transport Geography 36 124–133

- 3.8 The Transport Strategy does not commit the Council to increased P&R, rather in policy GABP8 it requires the Council to establish the 'need' for increased Park and Ride and to undertake a 'detailed assessment of sites'. This they have not done.
- 3.9 'Need' has not been established and no 'detailed assessment of sites' exists, or if it does this has not been made available to the public. In addition, no publically available heritage-focussed Setting Assessment has been conducted for any of the sites which is a requirement under ICOMOS WHS guidance, the *World Heritage Site Setting Study SPD* and the Historic England Good Practice Advice (GPA03) - *The Setting of Heritage Assets*, which underpins historic environment policy in the NPPF.
- 3.10 The Council report of 12.11.15 cited a report by CH2MHill as evidence of need for a P&R to the east of Bath. This report was not made available during public consultation and was selectively quoted. For example, the council report did not quote the section that explained that traffic in the city would not improve as a result of expanded P&R. This crucial section sets out that traffic would be broadly the same with the London Road (to the east) being slightly better in the morning, but worse in the afternoon peak.
- 3.11 The Council no longer makes reference to the CH2MHill report and has latterly commissioned Mott MacDonald to undertake traffic modelling work. These reports are at odds with each other and the Council continues to select those aspects that support their case and leave out those that do not.
- 3.12 Mott Macdonald have reported that an east of Bath P&R would take just 5% of traffic off the London Road in the morning peak.
- 3.13 The Mott MacDonald model has been extended to show the impact of adding a bus service from an east of Bath P&R to the Royal United Hospital (RUH) located west of the city. This increases their forecast demand by around a third. The RUH did not request this service, nor has it given the council any data to support this need. The projection does not take into account patient feedback, behaviour or needs, or the fact that the hospital has recently built 300 additional public parking spaces, or the fact that the NHS plans to deliver more treatment outside the hospital and nearer to communities.
- 3.14 The Mott MacDonald model as projected, results in a usage trend never previously observed in Bath. While the 2014 baseline model follows actual data and show the recognised bell curve of usage, the projections to 2029 result in a usage trend that rises sharply during the day without coming back down in the established way.
- This trend shows a peak at 4pm rather than the middle of the day
 - When looking specifically at vehicles whose owners are going to the RUH this accounts for 13% (53 vehicles per hour) of total Odd Down users in 2014, by 2029 this projection has increased to 28% or 223 vehicles per hour (four times more than 2014);

- This usage accounts for 28% of Odd Down P&R users compared to 12.5% in 2014 who went to the RUH in 2014;
- The 2029 projection shows no decrease in cumulative users through the day as with 2014. So that by 6pm there are still 301 cars at Odd Down P&R whose passengers are in theory still at the RUH. This is over 12 times higher than the 2014 model;
- The projection shows a 900% increase in usage of Park and Rides to the RUH by bus in 12 years.

3.15 It would be very difficult to justify the projections as even being close to the potential reality of RUH bus usage from Odd Down and the proposed eastern Park & Ride. The numbers appear overinflated, providing no alignment with trends or behaviours and appear to be a means of inflating demand to justify a large eastern P&R.



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

- 4.1 None (other than the proposed A36/A46 link road, a proposal rejected 3 times in the past at Public Inquiry for a variety of reasons. This proposal is not on the Highways Agency’s current agenda which runs till 2020 even for feasibility consideration).
- 4.2 Neither has the Council identified the underlying causes of congestion and emissions in order to bring forward appropriate solutions.
- 4.3 At the scrutiny hearing on 22.03.16 ‘Link and Ride’ from car parks on brownfield sites served by public transport, was recommended by Professor Parkhurst, and was

well received, but was not mentioned in the findings or the recommendations.

- 4.4 The Bathampton Meadows Alliance has conducted research that shows the traffic in Bathampton drops by a third during school holidays. The Council has not responded to requests to roll out this study across the city. ⁶
- 4.5 At the time the Transport Strategy was adopted the Council was unable to control the provision of buses. The decision to join the West of England devolution arrangement now offers an opportunity to increase and improve bus services through bus franchising.

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?

- 5.1 No. Doing so would be contrary to Action GABA18 of the Transport Strategy (where Action GABA18 requires the Council to; '*Identify need for increased park and ride capacity and detailed assessment of sites through the placemaking plan as part of a wider parking strategy*') and the Infrastructure Delivery Plan (which identifies an east of Bath P&R as key to development). Reflecting these policies, the Council must demonstrate firstly that the need exists and, if so, that a site exists which can meet the required environmental considerations and be capable of gaining planning consent. The Placemaking Plan should identify the chosen sites (or sites) or, failing this, explain that it has not been possible to identify a site, or that such a site is unnecessary. Planning and transport policy should not be predicated on such a facility being brought forward.
- 5.2 Relying on an application alone would seriously weaken the democratic process because:
- there would be no opportunity for an external and independent authority to consider whether the site chosen was suitable or the best option,
 - important questions around need and demand could not be addressed since this is not a material planning consideration,
 - planning applications can only be appealed by the applicant and, as the applicant in this case would be the Council itself, the community that opposes this development would be forced into a costly Judicial Review in order to challenge a decision.

List of references

1. Appendix 4 of LFD report to cabinet 4th May 2016
 2. LFD report to cabinet 4th May 2016
 3. Bathampton Alliance Report to Scrutiny March 2016
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4. Zijlstra, Vanoutrive and Verhetsel (2015) A meta-analysis of the effectiveness of park-and-ride facilities, *European Journal of Transport Infrastructure Research*, issue 15(4) pp 597-612
5. William Clayton, Eran Ben-Elia, Graham Parkhurst and Miriam Ricci: (2014) Where to park? A behavioural comparison of bus Park and Ride and city centre car park usage in Bath, UK; *Journal of Transport Geography* 36 124-133
6. BMA letter to cabinet may 2016