



Response to the consultation on the East of Bath Park and Ride proposals

15 October 2015

1. The Getting around Bath Transport Strategy identifies the need for a P & R east of Bath. Do you agree with this proposal?

No, the Trust does not agree with this proposal if it is confined to the sites proposed. The reasons are summarised below:

- No information has been provided to assess empirically the public benefits of any of the three sites relative to the landscape and WHS setting harm caused.
- When building a facility in the Green Belt and setting of the World Heritage Site the only possible justification is public benefit and therefore without this evidence the consultation is premature.
- Academic evidence seriously questions the assumption that Park and Rides reduce vehicle use in the City Centre or delivers economic benefits, especially if out of town parking is to replace city centre parking.
- A park and ride does not deal with the primary problem of through traffic.
- Academic research also points to other radically different models, with bus interchanges placed further away from the City, as more beneficial than Park and Ride.
- A sound and rational decision cannot be made on the evidence presented.

Concerns with consultation and information provided

The Trust has concerns about the nature of the public consultation. The options were either 'do you agree with a park and ride east of Bath' and, if yes, gave a forced choice between three sites.

Presumably the Council means this form of consultation to come into the category (described on the Council website) of Information Gathering - Offering options, listening to and *acting on feedback*. We are not responding to the consultation via the online form as we do not think it is possible to make an informed choice from the information provided. We are however providing detailed feedback here which we hope will lead the Council to think hard about the appropriateness of their current approach.

The reprise of controversial plans for a park and ride in this sensitive area of the city has been presented as a *fait accompli* which we suspect is driven by the political need to be seen to be

starting to deliver the infrastructure to entice developers into the Enterprise Area projects and to be seen to be acting swiftly on a local manifesto issue.

We object to the consultation on the basis that the information available to the public is incomplete and inadequate and misrepresents the actual benefits which can be achieved by park and ride provision.

Absence of 'public benefit' evidence

The Trust believes that the consultation is premature, given that there has been NO specific needs based data via survey, empirical studies or literature review of the actual benefits of an eastern park and ride service, or in any case nothing that has been shared with consultees (or apparently the Council's consultants). The high level Environmental Assessment by Mott Macdonald was asked to look at the Eastern sites relative to each other rather than in terms of whether they fulfilled the core strategic 'public benefit' criteria:

- To reduce congestion within the city and around our off-street car parking sites;
- To improve the city's environment;
- To reduce car use into the city centre and improve the proportion of journeys made by public transport;
- To reduce carbon emissions from transport;
- To support the city's economic development and Enterprise Area; and,
- To improve connectivity to support business and growth of the wider region.

The crux of the issue for the Trust lies in the fact that, as in the past, a convincing and robust evidence base for the proposals for an east park and ride site to fulfil these criteria does not exist.

- The actual traffic reduction benefits of park and ride facilities have been questioned in recent years by studies (see bibliography at end), which illustrate that local traffic and car use can increase with the introduction of a new park and ride facility, because public transport users are attracted (by cheap buses and free parking) away from buses and trains (modal shift) so that the net result is an increase in car use (detouring and generated trips) and a reduction in public transport use. This 'abstraction' also results in additional traffic congestion, increased vehicle miles travelled (VMT) and higher emissions in more rural areas as well as a decrease in local bus use that eventually leads to diminished rural services. As detailed in *Where to Park?: 'a level of trip generation and attraction of new trips not previously made to that city can occur (Parkhurst 2000b). Overall, and contrary to the assumed car traffic-reduction benefits of P&R, there is a lack of evidence for consistent reduction in mean vehicle miles travelled by users, while some evidence demonstrates that, in several cases, following the introduction of a park and ride, total traffic actually increased'*¹. This evidence is also quoted in a review of case studies published by Leeds University which, although finding some evidence of reduction of congestion in inner urban areas, found that abstraction from bus routes and some increase in extra-urban congestion was seen, as well as citing evidence for the replacement of any reduction in cars in the congested areas by latent demand.²
- An opportunity existed for the Council to assess in detail the benefits of the increased capacity of the three existing park and rides to fulfil the public benefit criteria above. We are unaware of any such research having taken place or its results issued, this would have provided a valuable, locally specific baseline of evidence.

¹ Where to Park? A behavioural comparison of bus-based park and ride and city centre car park usage in Bath UK – Clayton, Ben-Ella, Parkhurst, Ricci 2014

² Leeds case studies: WS Atkins and DETR

- The actual traffic reduction benefits of a long term park and ride site in the east of Bath has not been underpinned by any specific or substantial statistical data, user profiling, nor any technical evaluation of impact/capacity on transport routes such as the A46 or London Road. In fact, there is evidence³ that only a 10th of users to city centre car parks originated their journey to the east of Bath, (as compared to the populous south and west urban centres utilising the current park and rides). The main challenge is North of Bath traffic descending the A46. This evidence needs to be supported further by robust widespread data surveys conducted by B&NES in order to comply with Policy GABPA18 of the Transport Strategy:’ *establish the need for increased Park & Ride capacity as part of a wider parking strategy and to undertake a detailed assessment of sites to the East of the city...*’⁴.

Further evidence⁵ illustrates that a significant proportion of local traffic in Bath and within the city centre car parks is made up of local Bath residents (coming from within a <3m mile radius) accessing city centre services for a short time period - ‘popping to the shops’ - and these groups would not use a park and ride even if available. Similarly other daily phenomena contribute to city traffic congestion such as school runs. As a through route London Road is likely to be congested by a wide mix of users with a significant proportion of traffic passing through Bath; again data survey would illustrate the exact origin/destinations of users. This supports the point that more work is needed on making public transport more accessible (in particular the cost of bus fares which are higher than car parking charges, and on the wider use of subsidised school buses) and on promoting other ways for commuters and local residents to access the city centre.

Given the above, at least two of the stated objectives in the consultation document would not be met by a park and ride facility. First it has not been sufficiently evidenced by B&NES that an east park and ride would ‘*reduce congestion within the city and around off-street parking sites*’ as no technical data exists to support this. Secondly current thinking⁶ on the ‘abstraction’ element of park and ride services means that an east park and ride would NOT ‘*improve connectivity to support business and growth of the wider region*’ and would not ‘*improve the proportion of journeys made by public transport*’; as a park and ride in this area would eventually undermine the use of regional bus and rail transport.

- The actual sites deemed suitable appear only to be suitable on the basis of their proximity to Bath. We note that by contrast, Cambridge’s recently published integrated transport strategy states that bus, rail and road interchanges will be provided as far out along the feeder corridors as possible from Cambridge. We do believe the dismissal of the other viable sites is neither fully robust nor fully evidenced. In fact, data modelling of projected need from actual surveys of the more sparsely populated eastern sector and road users of the northern sector (M4 corridor) could support the development of a smaller park and ride facility further up the A46. We note that the consultation document speaks of ‘assessed demand’ however we have not seen details of the facts informing ‘assessed demand’.

³ Where to Park (p7)

⁴ Getting around Bath (p25)

⁵ Where to Park? (p5)

⁶ See studies in the bibliography

Substantial harm to the Green belt and setting of World Heritage Site

The UNESCO Committee report on Bath from Seville, 2009 specifically made the following recommendation:

¹ Also recommends that the State Party enhance the protection of the surrounding landscape of the property to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property;

The potential harm to the Green Belt and the setting of the World Heritage city are extremely serious issues which are not analysed in the consultation supporting information. The consultation document, in detailing site evaluation criteria, skims over these issues:

- *‘Cultural heritage: proposals should avoid direct and indirect adverse effects upon heritage assets’*. Actually this consideration cannot be achieved; all of the 3 sites proposed would have a serious adverse impact on the wider setting of the World Heritage City, the Bathampton and Batheaston conservation areas, multiple local listed buildings, the historic Mill Lane quarter, historic canal etc.
- *‘Landscape and visual effects: proposals should avoid adverse visual intrusion for the Cotswolds AONB’*. Again this consideration cannot be achieved; all the proposed sites would have very serious landscape impacts and intrusions; both in long views to the valley site from a circular surrounding area, in the scarring impact of such a development on a verdant and special riverscape, and the associated damage from earthworks, light pollution and vehicle emissions.
- NPPF Section 9: Protecting the Green Belt: The Green Belt around Bath was established specifically to prevent urban sprawl and coalescence of the City with the settlements around it. It provides an important setting for the World Heritage City and is named as one of the Outstanding Universal Values of the UNESCO inscription. The assessment of benefits and disbenefits of a large car park proposal must therefore be acutely rigorous. The Trust feels strongly that the current proposals constitute potential *serious harm* to the Green Belt and that in current form and detail B&NES has NOT presented enough specific evidence to support the assertion that park and ride will bring *considerable benefits* that constitutes *very special circumstances* to outweigh the serious harm to the Green Belt. In particular, the fourth purpose of the Green Belt as set out in the NPPF is to *‘preserve the setting and special character of historic towns’*.
- Protection of the setting of the World Heritage Site and its OUV’s: there is explicit detail in the City of Bath World Heritage Site Setting SPD regarding the duty and importance of protection of the WHS setting. The important characteristics of the setting of the WHS include: green undeveloped farmland, green spaces, trees and settlements within the setting, the views afforded to and from the city from its surrounding landscape and the opportunities for the enjoyment of the landscape within the setting including the interpretation and appreciation of the picturesque qualities. We would conclude in relation to this SPD that at this stage insufficient detail exists to support the proposal of any park and ride, bearing in mind that *‘the degree of detail needs to be proportionate to the scale of the effects of the proposal and the sensitivity or significance of the aspect of*

*the World Heritage Site that may be affected*⁷. As is obvious, this area within the setting of the WHS is highly sensitive as green river landscape, and as an area viewed from vantage points such Solsbury Hill, Bathwick Woods and Bathampton Down.

Lack of ‘Joined up Thinking’ from the Bath Transportation Strategy

- The consultation appears disconnected from the several of the overriding tenets of the Bath Transportation Plan, including the objective to *‘increase the availability of accessible public transport’*. As detailed above, it is known that park and ride services often have a detrimental impact on public transport provision as these modes of transport are abandoned in favour of free parking and cheap bus services.
- The consultation does not allow the public to have sight of the ‘wider parking strategy’ promised in the Bath Transportation Plan and to judge the proposals for a park and ride against this wider picture. In particular we feel that detailed assessment of the general traffic picture of the M4 junction to the Bath area is crucial (including the use of all the rural roads north of Bath), as it is the users of these main roads and ‘rat runs’ who would potentially be included in a P & R consumer base.
- The selection of a particular site for an Eastern P&R would also pre-empt any further decisions on the (admittedly fairly intractable) proposition for an A36/A46 route.
- The Trust strongly feels that the ongoing problem of congestion in Bath requires a long term integrated roads and transport management strategy to encourage sustainable access to the city and to limit through traffic, neither of which would be helped by a park and ride in this location. This could include consideration of creative responses such as long range ‘link and ride’ (to catch consumers at the M4 junction and further down the M4); working with public transport hubs outside B&NES to increase parking capacity; a charged-for low emission zone (currently being considered in Bristol), public transport subsidy and public transport priority and frequency improvements. In addition the development of the existing A420 as an appropriate ‘Bath bypass’ should be considered and further discussion about the restriction of HGV traffic actively pursued.
- As quoted in the HTF paper: *‘P & R has been implemented for 3 decades and so far there is limited evidence of its contribution for reducing car use even when implemented with other measures and reducing parking in central areas. Perhaps it is now time to see what changes in travel behaviour more radical alternative approaches can achieve’*⁸, though the paper acknowledges that this type of long term vision (as opposed to short term P & R gain) would require *‘strong political will and cooperation between neighbouring Local Authorities’*.

⁷ City of Bath World Heritage Site Setting SPD

⁸ HTF: The Effectiveness and Sustainability of Park and Ride (p13)

2. Which of these 3 sites would you prefer for this proposal?

The Trust does not support ANY of the 3 sites in the east of Bath. Sites B&F are highly visible and would cause substantial harm. It is possible that Site A would be more easily screened and potentially cause less harm but it should only be brought forward if public benefit can be shown. We strongly urge B&NES to commission appropriate research before determining options, by engaging consultants to gather widespread data (or publish data they may already have) that supports or refutes the benefits of their proposals.

We regret strongly that other sites up the A46 have been ruled out (not only Charmy Down which may have other landscape challenges). A site nearer the M4 junction could potentially reduce dangerous congestion on the A46 and absorb car numbers entering the setting of the World Heritage Site. It is nearer to the Link and Ride model where major intersections are the preferred location (Cardiff East P&R to some extent follows this model).

Given the problematic history of locating an East of Bath Park and Ride, the traffic from these areas offers an opportunity for more creative possibilities to have been explored rather than a solution which causes undoubted harm and may be 'yesterday's solution'.

Conclusion

The once popular fixed park and ride model of the last 40 years has not been demonstrated to produce the supposed benefits. This site selection has been hurriedly adopted and 'rolled out' without due consideration for current best practice and creative approaches to the issue of traffic congestion and parking in our historic city.

An east of Bath Park and Ride is not a panacea for Bath's traffic issues and we have not seen convincing evidence that it will bring enough transport benefits to significantly improve the World Heritage City and to mitigate the harm. As it stands, a park and ride might simply *displace* traffic issues, rather than solve them, and latent demand by through traffic might maintain congestion at current levels, while creating significant and irreversible harm to the landscape setting of the WHS and the Green Belt. If a cheap and easy service is provided, the public will use it -the net result is increased capacity and reduced price being promoted despite the negative implications for traffic and local transport. Moreover, in tandem to these transport considerations, is the very high potential harm of such a development to the highly valued east of Bath river meadows and the landscape setting which was summarised by the Inspector of the A46 Public Enquiry: *'a resting place for cars and numerous buses which, whatever its merits, will despoil the valley fringe, affront the Georgian buildings close by and be a grave offence to the eye from the other side of the valley'*.

Bibliography:

Where to Park? A behavioural comparison of bus-based park and ride and city centre car park usage in Bath UK - Clayton, Ben-Ella, Parkhurst, Ricci (2014)

Evaluating alternative concepts of bus-based park and ride - Meeson, Ison, Enoch (Transport Policy) 2010

Historic Towns Forum: The Effectiveness and Sustainability of Park and Rides - RPS (2009)

Getting Around Bath - A Transportation Strategy

The City of Bath World Heritage Site Setting SPD

http://www.its.leeds.ac.uk/projects/konsult/private/level2/instruments/instrument035/l2_035c.htm (presentation of case studies offering empirical evidence of the use and impact of Park and Ride schemes)