

Bath Preservation Trust response to West of England Transport Vision Consultation

Summary

1. Bath Preservation Trust¹ recognises that transport is an issue which has to be considered regionally and sub-regionally as well as locally, and therefore welcomes a Strategic Transport Vision for the West of England Area. We believe that to benefit Bath, the planning area must be extended to include Wiltshire.
2. The aims of the vision are admirable, but in relation to the sub-region of Bath at least, we are not convinced that the proposed investments will realise the ambitions of modal shift and reduced congestion.
3. We are concerned that policy in Bath has been driven by a leap to solutions rather than a substantial grounding in primary source evidence. This has been apparent, for example, in the debate locally about Park and Ride and the A36/46. We would urge the planners of the strategic vision to learn from this mistake. A detailed critique of the evidence and policy base underlying B&NES Council's reliance on Park and Ride has been sent to you by the Bathampton Meadows Alliance: we support their analysis.
4. We think there are number of specific weaknesses in the Vision.
 - The vision does not acknowledge the special environmental qualities and challenges in and around Bath due to the extent of the intact historic city centre and the protected nature of the World Heritage Site and its setting. The

¹ Bath Preservation Trust was set up in 1934 to safeguard the historic city of Bath, now the only complete city in the UK afforded World Heritage Status. The purposes of the Trust are to:

- encourage and support the conservation, evolution and enhancement of Bath and its environs within a framework appropriate both to its historic setting and its sustainable future, and;
- provide educational resources, including museums, which focus on the architectural and historic importance of the city.

The Trust does this by:

- Campaigning and providing expert advice and opinion of planning applications, planning policy and legislation, and other matters affecting the World Heritage site and its environs;
- Running 4 museums with specific themes and collections relating to the Georgian period, its economy, its buildings, social life and personalities;
- Providing educational resources, lectures, talks and events for all ages, in particular relating to the built heritage in Bath; and
- Having an active membership of involved and concerned subscribers.

The Trust is a registered charity supported by over 1400 members, who share a passionate concern and interest in the city. We receive no government funding, but are financially supported by our members, by grants and donations, and by income from our museums.

protection, conservation and enhancement of this regional asset needs to inform policy, including transport policy, towards the City. A reliance almost solely on Park and Ride has failed to do this, and the evidence suggests that it cannot and will not do so. In particular, it is not satisfactory to push the city centre's problems out to the immediate environs of the City or vice versa - the City and its setting must be considered together.

- The question of affordability of public transport is not explicitly addressed. Currently it is significantly cheaper as well as more convenient for a family (or group) of 4 to come into central Bath by car than by any other form of transport. The JWE needs to address this problem in order to achieve modal shift.
- The lack of a clear region-wide vision for the delivery of demand management mechanisms is regrettable. Congestion charging infrastructure that could serve both Bath and Bristol urban centres might be deliverable in a way that purely local provision is not.
- We are very concerned that Wiltshire (and to a lesser extent Mendip) is not part of the vision for transport delivery. We do not consider it possible to have an appropriate transport plan for Bath, especially East of Bath, without the close involvement of Wiltshire Council in open consultation, shared strategic planning and jointly agreed solutions.
- We are concerned that despite existing evidence to the contrary (see submission from the Bathampton Meadows Alliance and others) there is an acceptance of the assumption that an East of Bath P&R will reduce congestion in Bath. This has been shown not to be the case and acknowledged as such by B&NES Council before a Planning Inspector. In light of this, the specific environmental harms created by an East of Bath Park and Ride on Bathampton Meadows far exceed the public benefit. We think that an opportunity has been missed to revisit the appropriate sub-regional solution for reduction of Bath's traffic problems.
- We are completely opposed to a Freight Distribution Centre on Bathampton Meadows and we are concerned at the apparent disconnect between the drafting of the vision and the strategy of B&NES Council, especially given the senior officer links between the two. <http://www.bathchronicle.co.uk/plans-for-new-freight-consolidation-centre-to-the-east-of-bath-put-forward/story-29988538-detail/story.html>. If a Freight Distribution centre is a serious consideration East of Bath, this offers the opportunity to look at investing in infrastructure nearer the motorway interchange rather than in the immediate setting of the World Heritage Site.
- We see no evidence in relation to an A36/46 link which would suggest that the previous public inquiries on this proposal, which rejected such a link on grounds of

geological instability, disproportionate environmental harm, lack of cost-effectiveness and a lack of convincing evidence that the ‘problem’ - HGVs in Bath city centre - would be. The public inquiry in 1990 rejected the proposal on grounds of the geological instability of the Limpley Stoke valley rendering it inappropriate for increased traffic load. In the last decade alone there have been two major periods of road closure dealing with subsidence on the A36. The Government commissioned Bristol/Bath to South Coast Study of 2004 also rejected this route. A critique of the approach taken to the promotion of a link road can be found at <http://transitionbath.org/a36-a46-link-road-justified-alternatives/> and a detailed policy and environmental review at http://www.a36a46linkroadfacts.org.uk/wp-content/uploads/2016/09/A36-46case_review.pdf

- We would prefer that the question asked of the Highways Agency did not pre-empt the answer as to routes and appropriate changes to the trunk road system but asked the open question as to what would be most effective - especially in light of a J18A proposal - in order to reduce through traffic in Bath.
- Finally, Bath’s transport solutions have been compromised at every turn by the absence of substantiated evidence based on primary patronage data. There is no thorough origin-destination surveying; the data on Park and Rides shown significant spare capacity at peak periods; the modelled impacts on congestion of either P&R or link roads have led to a retraction of political claims for either of these approaches. The JWE plan can never achieve its ambitions for Bath unless its solutions are based on new, detailed evidence which can be interrogated in the public domain and which stands up to independent scrutiny.

END OF SUMMARY: RESPONSE TO INDIVIDUAL QUESTIONS FOLLOWS.

Our response to the individual questions posed is as follows:

Q1. Is the level of ambition for the Transport Vision about right? No. The stated ambitions of the strategy ‘to reduce our proportion of trips made by car substantially’ are not met by sufficient realistic measures for demand management and affordable public transport to deliver the required benefit for the City of Bath. The major congestion and pollution problems within the City of Bath will not be improved simply by providing more centre-to-centre capital infrastructure and additional Park and Ride capacity. The Vision also lacks an emphasis on partnership with neighbouring authorities: west Wiltshire forms part of the Bath Housing Market Area (HMA) and looks to Bath for many services, and there is (see below) a need to improve road access between Bath and the M5 southbound: we support FOBRA’s call for the Vision to aim at a step change in WoE collaboration with Somerset and Wiltshire, and add that such collaboration should appear in the open timetabling and consultation process for the plan.

Q2. Do you think we are proposing the right mix of public transport investment (bus, rapid transit, park and ride and train)? No. Providing better and more affordable alternatives to the private car is necessary for reducing the use of cars in Bath and other urban centres. Solutions which encourage private car use in the periphery, such as park and ride, do not address the underlying problem. Park and Ride is no longer included in DEFRA’s solutions for improving pollution and congestion; DEFRA has recognised evidence of which the JWE vision seems unaware and B&NES Council seem determined to ignore. Travel demand management, including traffic management measures, more residents’ parking, workplace parking levies, congestion charging, or a reduction in parking levels is essential to discourage private cars and goods vehicles from entering the city. These should be included in the local transport plans, and the Transport Vision should include reference to demand management measures. In particular, congestion charging could be an affordable infrastructure investment if implemented for all urban centres across the region, but not, as suggested in the plan (page 14) at a local level only. The Nottingham model has something to offer this region in terms of an integrated transport approach which includes both subsidy and demand management.

<http://www.nottinghamcity.gov.uk/transport-parking-and-streets/public-transport/>

Q3. To what extent do you agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes?

Strongly agree, but investment in new roads needs to be well founded in an evidence base which concludes that the desired result will in fact ensue. New roads can merely draw in more traffic. We are supportive of the diversion of non-local (through) traffic from the centre of Bath but are not convinced that the usual preferred suggestion (eg the A36-A46 link) will achieve this result. IF such major trunk road modifications are suggested the question asked should be ‘how to remove through traffic’ rather than ‘how to link this or that road’. Meanwhile these very big ticket East-of-Bath solutions divert attention from

genuine improvements in public transport from towns and villages East of the City.

Q4. To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors? We particularly welcome the potential for rail connections from Bath to Bristol Airport either by rail or LRT, but are concerned about the realism of an LRT solution in the centre of the City of Bath, given substantial environmental constraints (visual and structural). We would prefer resources to be directed more clearly to demand management than to very high cost major infrastructure projects. We note that no such infrastructure is proposed East of Bath which seriously limits any beneficial impact on that City.

Q5. To what extent do you agree with using financial incentives and financial demand management at a local level to raise funds to help pay for the transport vision? Agree they should be used. As mentioned above we do not agree that such measures have to be planned and conceived on a local level only. Bath's earlier consideration of congestion charging resulted in the conclusion that for Bath alone the management and infrastructure demands were too great to make it cost effective. However at a regional level this need not be the case. In addition region-wide number plate recognition systems offer opportunities for other controls of eg inappropriate HGV movements, diesel car monitoring etc. We therefore think that charging for visitor parking, congestion charging and workplace parking levies should all be considered region-wide to manage demand and raise funds. Congestion charging potentially offers an efficient, powerful and fair way to tackle congestion: charges should be modulated to favour local taxpayers over tourists, and in particular to discourage through routeing by HGVs. Congestion charging (and a clean air zone) in both Bath and Bristol city centre should be considered as part of an overall traffic management plan to ensure that HGV and PSV traffic is not simply displaced onto nearby residential roads.

Q6. What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre? The introduction of a new motorway link from the M4 to Emerson's Green (J18A) could relieve pressure on the very busy Junction 18 access to Bath, as well as helping local access. However, in any feasibility work for such a junction there should be careful modelling of the impact on the western side of Bath. At the moment the gaps in the trunk road network are perceived to be most acute East of Bath: however a new J18A could create exactly the same problem W of Bath and create a new North South route demand resulting in a worsening of the through traffic problem in Bath. We would therefore suggest that any plans for a J18A include consideration of a S/W of Bath route to the A36/A303, leaving the A350 as the east of Bath route and therefore negating the need for an A36/46 link (which has been shown by many previous inquiries to be environmentally damaging out of proportion to benefit as well as not cost-effective or necessarily geologically feasible).

Q7. Do you agree with the following elements of the package?

- **Marketing and education to change travel behaviour.** Yes. More investment needed. There is currently too little of the overall budget attributed in this way. The JWE package has the opportunity to enable and sustain campaigns and community action across the regions which challenges the use of cars and promoted the personal and public benefits of other forms of transport.
- **Area packages of improvements for pedestrians, cyclists and buses.** Yes. More attention should be paid to off-road urban footpaths, both in new developments and where 19th Century paths need to be protected. In particular, the topographical challenges in Bath mean that riverside/railway-side routes need to be protected or enhanced: these are also the most geographically sensible routes between settlements. East of Bath (in Wiltshire) should be included in such measures.
- **Strategic Cycle Routes - new or upgraded routes.** Yes, including to east of Bath.
- **Park & Ride - new or expanded sites.** No. We are unconvinced that there is an evidence base to support an 'old-fashioned' Park and Ride east of Bath close in to the City Centre. The first site promoted for such a P&R by B&NES Council was at the Lambridge Rugby ground. The plans for this site at the time rejected the promotion of a site on Bathampton Meadows on environmental grounds. When that site failed, the Council next moved to promote the very sites they had earlier rejected, on Bathampton Meadows, where there would be substantial environmental harm both to the Green Belt and to the setting of the World Heritage site. Such a Park and Ride would not (contrary to the statement on page 11 of the consultation document) reduce congestion on main roads, as B&NES Council now admit.

It is plausible (though would need evidencing) that a Park and Ride at a nodal point, either near J18 or at the A46/A420 junction, could provide a valuable way of intercepting tourist traffic into Bath City Centre as well as Bristol-to-Bath commuters. This would act as more of a 'park and link' model and might also provide a better location for any freight consolidation centre. The data provided in the submission from the Bathampton Meadows Alliance and the Valley Parishes Alliance demonstrate that a P&R to the East of Bath as proposed by B&NES Council would not deal with peak time congestion.

B&NES Council are also inconsistent in their policy approach to parking (a major source of revenue). Peak time congestion will continue into Bath as long as there is a relatively plentiful supply of City Centre parking.

- **Bus network improvements.** Yes. The key problem with the bus network in and around Bath is that it is not competitive, either financially or in terms of convenience, when compared with the car. It will be necessary for the WoE authorities to take regulatory control over regional bus services with a clear ambition to drive bus usage over that of the car in terms of affordability, reliability, frequency and comprehensiveness of service. We hope that the recently agreed devolution deal will pave the way for this. East of Bath towns and villages based in Wiltshire and Mendip need to be included in such consideration of alterations to the bus network if there is to be a benefit for Bath.
- **Expansion of the MetroBus network.** n/a. Benefit to Bath not apparent.
- **Light Rail routes.** It is unclear how such a route could pass through central Bath given environmental constraints.
- **Rail improvements - improvements to existing services and facilities.** Yes. There needs also to be substantial dialogue with West Wiltshire to facilitate improvements to parking capacity and train frequency at Trowbridge and Bradford on Avon, and preferably to increase linkages to Melksham to encourage further rail use from there also as they are significant feeder towns for Bath.
- **New railway stations.** Yes. New stations at Corsham and Saltford could encourage people to use rail instead of cars for access to Bath.
- **Road improvements, including junction improvements & addressing bottlenecks.** Hard to disagree, though in Bath the improvement of bottlenecks is highly challenged due to the width of roads etc. The use of the Lower Bristol Road as a through route is very challenging and it is possible that consideration should be given to a South of Bath diversion. This may become even more important if a J18A is introduced.
- **New road connections.** We are not convinced that there has been any significant change in the arguments for or against an A36/46 route to make it more cost effective and deliverable than previous public inquiries have found. Bath Preservation Trust strongly opposes solutions which cause acknowledged substantial environmental harm without convincing evidence as to the benefits. In relation to Bath, the question which needs to be addressed is the reduction of through traffic. Solutions to this could include the greater use of the A420 as a 'Bath bypass', a revisiting with West Wiltshire of improvements to the A350, where substantial enabling improvements have already taken place around Chippenham, and a restriction of HGV and non-local traffic on Cleveland Bridge. In order to

answer this question, primary data gathering on driver movements and intentions (rather than theoretical modelling alone) needs to be undertaken as a priority.

- **Freight management including consolidation centres.** We are not in sufficient command of the evidence base to know whether a freight consolidation centre would work for Bath. It would however be entirely inappropriate to place a Freight Consolidation Centre in the immediate setting of Bath (Bathampton Meadows) as indicated in the indicative maps in the Vision. We recommend the exploration of the evidence base for a combined freight consolidation/park and link solution near the motorway at the J18. We also note that the creation of a J18A may place demands for freight West of Bath which should be addressed in any planning.

Q8. Are there any other schemes you would like to see in the package? Yes:

- Proper investment in primary data capture in Bath travel zone. No significant origin-destination research work has been carried out in Bath for years. Without this, claims are made about through traffic, reduction of congestion etc without foundation. Without such research it is not possible for Bath Transport Plan to be convincingly described as evidence-based.
- Better school travel planning, and financing measures which have benefits in this area. This is particularly relevant in Bath where there are limited river crossings and substantial school populations in the private and maintained sectors criss-crossing the city. There is also a case for examining subsidy for school students, who are currently obliged to pay full fare on buses and trains post-16 (young persons' discounts do not apply before 930am) thereby encouraging continued parent or child car use transport which takes into account private and public sectors.
- Region-wide feasibility of congestion charging/low emission zones/ultra-low emission zones.
- Expanded use of the A420 as an alternative route between the east of Bath and Bristol. From the east of Bath, the distance to Bristol is almost exactly the same by the A420 as through the city of Bath. The A420 is relatively under-used, and there is much less housing on the A420 than on the route through Bath and Saltford. But it is not even signposted on the east of Bath as an alternative route to Bristol (eg "Bristol avoiding Bath").
- Region-wide control of car use by university students - A 4-university control and enforcement approach.

- Greater use of ‘futuorologists’ in developing the correct solutions in relation to rapid technological change. eg driverless cars, internet delivery services. Transport policy can appear to be driven by ‘yesterday’s solutions to today’s problems’. This is particularly true in Bath where an adherence to questionable schemes of the 1990s has continually failed to address congestion and pollution issues.

ENDS