



P & R Background Paper

Why BPT Opposes an East of Bath Park & Ride

BPT's Remit

The Trust exists “to preserve for the benefit of the public the historic character and amenities of the City of Bath and its surroundings”. This dual charitable remit means that BPT is as committed to the protection and enhancement of the green landscape setting of the city as to the historic city itself.

First, do no harm

The overriding planning consideration enshrined in the NPPF states in para 132 that substantial harm to a World Heritage Site should be wholly exceptional. The green setting of the World Heritage Site is an integral part of the Georgian townscape according to UNESCO, and feature in all three criteria for WHS inscription.¹

An east Park and Ride would inflict harm, which we argue would be substantial, to the World Heritage site by destroying the very significant relationship between the city and its green open landscape setting in the east of the city. According to the NPPF local authorities should refuse consent for schemes which will lead to substantial harm unless the harm ‘is necessary to achieve substantial public benefits’.

So what exactly is the public benefit of a P & R and would it be ‘substantial’?

The requirement to justify the ‘need’ for an east park and ride site is also a primary consideration, and one that has not so far been fulfilled. Contrary to the Council’s statement to Cabinet (para 8.1, p35) the Inspector did not accept that need has been established but that it would be necessary to establish need prior to a site being brought forward. Policy ST6 (original draft) states that there should be no unacceptable impact on the WHS. The proposed revised draft states that there needs to be clear and convincing justification for any harm to the WHS, and that the degree of harm should be weighed against the level of public benefit.

Compelling current national and international academic research and credible statistical evidence from local organisations (http://bathamptonmeadowsalliance.org.uk/wp-content/uploads/2017/01/October-2016_Meeting-with-Ashley-Ayre-Final.pdf) show that a Park and Ride in the east of Bath will not produce the public benefit to outweigh the substantial harm. Therefore, at present, there is neither convincing justification nor any indication of the *level* of public benefit (as required in ST6). In summary, this scheme is contrary to both national and local policy.

The Council’s Claims Questioned

The Council now admit themselves that an East P & R will do little or nothing to improve congestion on the London Road, and thus in turn to improve air pollution.

The council says an East P & R will:

Support the city’s economic development and EA - How? Current plans for the first phase of EA development indicate that underground car parking will be provided in both North and South Quays, so it’s sensible to expect that some parking will be provided for Manvers Street and other EA sites, but this is not accounted for in the

¹ for example; ‘Bath’s grandiose Neo-classical Palladian crescents, terraces and squares spread out over the surrounding hills and set in its green valley, are a demonstration par excellence of the integration of architecture, urban design and landscape setting’

Council's forecasting. Demand for parking rarely exceeds supply, except during the Christmas market, so a provision for peak days should be made, not year round over-provision.

Reduce congestion - **NO**, it will not significantly reduce congestion on the London Road as the Council's own forecast projects that an east P & R will only reduce London Road traffic by 5% by 2029. It may INCREASE congestion on main east routes and in east of Bath rural areas as more people use their cars to get to the P & R rather than use public transport.

Improve the city's environment - **NO**, our roads will still be heavily used by A46/A36 through traffic (including HGV's) and by local residents and school runs, who are not the expected users of a new P & R.

Reduce car use into the city centre and improve proportion of public transport - **NO**, local resident car use will continue to clog up our roads until they are incentivised not to drive into the centre via better and cheaper public transport or by some form of congestion charging model. Rural public transport services will actually decrease as demand is impacted by the P & R.

Reduce carbon emissions/improve air quality -**NO**, since congestion will not improve there is no case for this. Local resident car use will continue to clog up our roads as above. Additionally you will see a P & R ENCOURAGE people back into their cars to drive to a P & R, producing a net increase in pollution, especially in the sensitive areas around Bathampton and Batheaston that are already close to national poor air quality limits. Compulsory low emission zones incentivising less polluting cars would be more effective.

Improve connectivity to support business growth - **NO**, how will a new car park improve connectivity? What does this statement actually mean?

Future Proofing?

'Predict and provide' models of transport provision have been shown to attract and encourage further car use. Surely 'future proofing' is looking to innovative future sustainable transport solutions and encouraging people out of their cars?

The Specific Site Proposals

Both sites B and F have serious flaws as viable options because of their visibility in important long views, openness and their significant role as the green setting of the eastern part of the WHS. The harm to these valued qualities, as well as to the natural environment would be substantial, and we cannot see that screening would sufficiently mitigate this harm.

Need for a Creative Regional Approach

The Joint West of England Transport Plan is notable for the disparity of ambition between Bristol and Bath. We urge the Council to use this opportunity for regional collaboration more effectively.

In Summary

There is:

- poor evidence of NEED
- Little evidence of PUBLIC BENEFIT
- Undisputed evidence of HARM
- Inconsistency of approach in city centre PARKING
- A lack of VISION and INNOVATION

The East of Bath Park & Ride is an expensive, divisive, diversionary white elephant, sucking up borrowed investment which could be better spent on demand management measures.

We urge the Council to think again.