



BATH PRESERVATION TRUST

Coach Parking Strategy Consultation Response

The Trust welcomes the recent research and consultation that has been undertaken to inform B&NES' coach parking plans; up-to-date data on patronage, needs and priorities should always underpin strategic planning, *however* the consultation was flawed in that it focused mainly on the needs and priorities of users and operators of coaches and did not give an adequate voice to local heritage, residents and amenity groups such as ourselves, nor on actual assessment of economic benefit in order to undertake a balancing exercise. At the large round table consultation event in 2016 these groups were under-represented in favour of those with a vested interest in keeping coaches moving and parking in and around Bath.

With this in mind we believe the whole strategy to be contrary to the long term Transport Strategy and the vision for transport in Bath as publicised recently by the new Cabinet Member for Transport. That is that traffic and congestion in the city centre should be minimised to improve air and environmental quality. By contrast, this strategy seeks to maintain and actually increase the amount of coaches in the city centre, creating traffic congestion, unacceptable impact on the setting of heritage assets and adding to pollution and therefore cannot be supported. It is fundamentally counter-productive to what the Transport Strategy and other strategic planning policy looks to achieve; a traffic free or low traffic city centre and de-congested main routes. This suggests a lack of joined-up thinking by B&NES.

Benefits coaches bring to Bath

We acknowledge that there is some economic benefit brought by coach visitors. There is however a hierarchy - most benefit brought by overnight visitors, some benefit from visitors who visit Bath in the short 2-3 hour slot, but no benefit from those that circulate the Upper Town and then leave for the next sight on their tour. In fact these coaches contribute nothing to the city economy except an increase in harmful polluting emissions. We welcome the overall aim to encourage longer stays by coach users, but we also recommend that there is active discouragement of those 'cruising' coaches, perhaps via the use of some kind of tour bus congestion charging. The report refers to the aim in the Destination Management Plan to grow tourism through an increase in value and not quantity but then does not attempt to grasp the issue of those '10 minute photography' coaches parking in bays meant for drop off/pick up of visitors who will buy lunch and a souvenir.

Appraisal of potential parking and pick-up/drop off points

The fundamental premise of this appraisal is flawed as it starts with acceptance that the current situation is tolerable and that an increase in drop off/pick up bays and short term parking in the city should be accommodated. We oppose this assumption and suggest that this springs from the lack of very early consultation with key stakeholders such as residents groups and ourselves. An increase in parking bays across the core city will add to an already highly congested traffic system, further harm the visual amenity of the historic city and exacerbate air quality issues and therefore should not be part of the proposals.

Our specific response to the detail of the strategy:

1. Pick up/drop off points: We oppose the increase in provision proposed at Terrace Walk as this will create an unacceptable visual and environmental impact on a core historic site which is already an eyesore. The proximity to the highly significant Abbey and North Parade should mean that the current status quo of spaces should be maintained not increased. Not only do coaches create congestion in core centre routes to access this site but the turnover of coaches if 5/6 20 minute spaces are agreed would mean that the area would never be free of lines of coaches during the day. The associated impact on the visual amenity of this central place within the World Heritage Site would be extremely harmful.

If this were a planning application, there would be a requirement for a Heritage Impact Assessment to assess the harm caused by a continual flow of coaches parking within and therefore harming the setting of nationally important heritage assets. An balancing judgement of harm versus public benefit would then follow, and in this case the benefit that coaches bring to Bath's economy has not been properly examined or extrapolated from the limited data collected on coach movements, therefore such a judgement would be impossible.

We have similar concerns regarding the proposals for Royal Avenue and Green Park though the severity of heritage harm is slightly less as these sites are in more open areas and a little outside the medieval city. That said however in the case of Green Park, the 90 minute 4 bay parking proposal will provide an eyesore line of coaches that not only harm the setting of listed buildings but also the valued green space adjacent to the parking area and the Council's own flagship Bath Quays and Bridge development.

2. Coach parking: we welcome the proposal to use Odd Down P & R as a coach park though the success of use of this car park will be dependent on whether the associated infrastructure is delivered as proposed. We also recommend that the impact of timing of coach movement on the Wellsway and approach roads is assessed.
3. Use of P & R sites: the proposal makes a short reference to a long term aim to explore the opportunity for coach drop off/pick up at P & R sites; this makes great sense to us and we ask why more could not be done to bring forward this action to a short term goal, especially given that P & R sites and buses are rarely full?

4. Use of charging and technology: this is not our area of expertise but we welcome the practical and achievable application of technology and charging structures to facilitate the effective management of coaches through the city.

Summary

'The reduction of the impact of vehicles is vital in this unique UNESCO World Heritage city.' (Getting Around Bath - B&NES Transport Strategy).

BPT cannot support this proposed strategy as we believe it is a reactive approach to the coach market alone that is not to the benefit of the World Heritage City or its residents. It is heavily skewed more to satisfying the needs of tourists and the coach companies, including those that bring limited or no economic benefit to the city. We recognise that some economic benefits are brought by the short stay tourists and we are not suggesting that coaches should not access the city, but that the Council should not be bending over backwards to accommodate and increase the convenience, comfort and provision of coach facilities to the detriment of the much-supported ambition to solve Bath's traffic problems. We would be delighted to see a bold approach to coach management that starts from a point of protection of the WHS and recognises that the qualities of Bath are special enough for people to want to visit even if it is slightly more inconvenient than the current (very convenient) arrangements for pick up/drop off.

The phrase '*environmental impact*' was used only once in the 10 summary page document which is a telling sign of the considerations of the consultation team (in fact the words *heritage*, *air quality* and *congestion* do not appear at all!). The long term goal to reduce congestion and traffic within Bath is a high priority for many key stakeholders including the Council. Action towards this goal should start now with a joined-up approach to traffic management that includes a parking strategy both for cars and coaches that works towards the aspiration to minimise traffic in the city centre, to the benefit of both visitors and residents.

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