



BATH
PRESERVATION
TRUST

Parking Strategy Consultation Response

The Trust welcomes the consultation with residents that has been undertaken to inform B&NES' parking plans; however up-to-date data on patronage, needs and priorities should always underpin strategic planning, and this consultation has not undertaken such research. This gap in knowledge means that this Strategy is not underpinned by a comprehensive evidenced profile of users' behaviour (as opposed to resident's opinions), nor any data on user origin or motivation for using certain types of parking. Our detailed observations on the proposals can be found below.

Bath Preservation Trust's remit seeks to preserve the green countryside around Bath as well as the World Heritage Site itself, It was for this reason we opposed the East of Bath Park and Ride. We are therefore keen to see transport solutions which do not merely displace parking from one locality to another but actively seek to change the ways in which people use transport, their cars and the city. We recognise that the inner centre of the city, that is the medieval core and the immediate 18th Century areas around it are particularly environmentally sensitive and we have therefore supported previous policy statements which have led by seeking to minimise car access to as well as parking in the City Centre.

Key Proposals

Whilst we support much of the broad vision as outlined on P3 of the Summary Document, we believe that prioritising the use of more short term parking is actually counter-productive with the aims of the overall B&NES Transport Strategy. Short term on-street city centre parking encourages more cars driving within the city centre, and in particular cars that 'cruise' for spaces, thereby creating more city centre congestion, especially bearing in mind short term parking generates more car journeys due to the turnover of spaces. A primary aim of the Getting Around Bath Transport Strategy, and the recently publicised Vision of the Cabinet Member for Transport Mark Shelford is the reduction of cars, and thus congestion in the city centre; therefore there is a serious disconnect between the two strategies. We understand the reasons articulated for prioritising short stayers over commuters but question whether this is supportive of business, given that local businesses need to be able to be staffed. We support the long term goal to reduce cars within the city centre and do not see how this key element of the proposals achieves this goal.

Of course prioritising the needs of businesses makes great economic sense for the city and we support this aim but we believe that bringing shoppers, service users and business

customers into Bath city centre can be achieved by facilitating behavioural change leading to a modal shift to public transport, walking and cycling.

We note that one of the key levers available to the Council to modify behaviour, that is parking pricing, has not been identified as within the main proposals although it is referred to at individual points. We would suggest that there should be an over arching proposal to use parking pricing to incentivise behaviour change including type of vehicle.

Table of proposed objectives and actions:

1. **On Street Parking:** we support the Hierarchy of Kerb Space allocation but again re-iterate that a ‘higher turnover of visitors’ targeted by a good supply of short term parking bays is contrary to long term strategic transport aims to reduce cars in the city centre.
2. **Out of town and off-street parking in Bath:** we welcome the ambition to encourage commuters to use more out of town parking and public transport, however we cannot see how, without an improvement in the regularity, cost and service of public transport (in this case buses) this could be facilitated. Ideally this should be prioritised as a ‘Park and Link’ approach based in the communities where commuters live. This strategy must go hand in hand with action regarding public transport availability (including evening provision) and cost, not just encouragement; if a service is not available or financially unattractive, then no amount of ‘encouragement’ will work and then this remains merely a hope rather than a deliverable target.
3. **Park and Ride:** The Trust welcomes the investigation of provision for smaller more informal park and ride sites around Bath. We query what an ‘informal’ site means unless it is meaningfully connected to a public transport hub and we would rather see a more formal investigation of the possibilities of Park and Link. The Trust has consistently called for more provision nearer J18 on the M4 such as the Toghill Picnic Area and the parking site currently closed by the M4 junction, though of course as stated the provision of effective cheap public transport from these points is key. We also do not oppose the sensitive expansion of existing P & R sites providing there is evidence that it is really needed. We understand that data in the supporting documents to the Strategy overstates the actual use of P & R’s and that actually the sites have more capacity than is suggested. We suggest that the Lansdown P & R could attract more users from the east of Bath if it was better signposted from the M4 and other N and E main routes and that a proper traffic light junction should be installed at the problematic Freezinghill Lane and A420 crossroads. ¹

¹ We note that on Saturday 14th October, when a Bath Rugby Match and a University open day coincided, there was almost no capacity in the city centre by the afternoon and yet the Park and Rides still had hundreds of places available (source: Bathhacked data on Bathcarparks.com). Your own data implied that pricing is a factor in the unattractiveness of the Park and Rides.

4. **Private non-residential parking:** we recognise that private parking is not within the control of B&NES but we recommend that closer liaison and planning is undertaken to ensure that traffic congestion resulting from full car parks is managed better, a prime example being the traffic jams that result when Southgate Parking is closed by barriers at the entrance gate and drivers have to suddenly divert at an already constricted city centre junction. Measures could include introducing real time on-road warning (Car Park Full) and diversion signs at regular intervals on routes to a main car park. Private business parking should be subject to a workplace parking levy similar to Nottingham City Council. The one element of business parking which is within B&NES control is the use of city centre parking spaces by B&NES employees. We suggest a review of the c400 places² currently available to B&NES employees and suggest that the Council lead by example for developing real alternatives and incentives to this form of commuting and transport.
5. **Coach Parking:** we have a concern that too many short term bays are being allocated to coaches and that without proper management and enforcement, this system of drop off is open to abuse. We hope that the promised pre-booking system will work effectively ensuring that the city is not inundated with coaches circulating to their drop off zone and then to Odd Down.
6. **Parking Charges:** we welcome the idea that on-street parking should be discouraged via pricing in favour of off- street parking. Your own detailed report summarises that the cost of Park & Ride buses is a factor in visitors choosing NOT to park in a P & R (i.e. that it is cheaper for two people to park in town than to park in the P & R and use the bus) and this issue needs to be addressed, perhaps via charging by car not by person on the bus. We note that the new Cabinet member has talked about differential parking pricing for low emission and high emission vehicles, though this is not mentioned in the strategy. We would welcome this, and believe that it should be applied equally to residents' parking permit pricing to encourage the use of low emission vehicles by Bath residents.
7. **Car parking standards for new developments:** your report summarises that new developments aim to reduce the level of parking permitted to encourage greater use of public transport, but again we re-iterate that public transport needs to be fit for purpose and users incentivised to underpin this aim.
8. **Major event parking:** we welcome better collaboration between major event organisers and stakeholders and a framework for good practice for parking management. We do not support the extension of major event parking in the city centre (for example the cricket ground and bowling green) as this brings in further cars and congestion to the city centre; the focus of extra parking should be concentrated on edge of town/out of town via use of city periphery flat fields (with grass reinforcement mesh) eg at the Racecourse or the University and there should

² Data from an FOI request 2015

additional P& R public transport provision. Encouraging people to use P & R facilities at these events will only be successful if there is convenience and a financial incentive, so again we urge review and action regarding the cost of P & R services.

9. **Information and signage:** Whilst we recognise that there are a number of Variable Message signs operating in the city centre and a partial real time parking availability website at bathcarparks.co.uk these are shown to be ineffective at warning car users early enough that a car park is full (and are not comprehensive), so traffic still clogs up near car parks (e.g Southgate and Podium) - a review of the location of these messages and their poor interface with private car parks is essential and new locations/more effective signage installed. In particular these should be installed at key gateway locations to the city. Messages indicated the probable lack of availability of parking in the city centre should be flashed, for example: 'city centre parking full, use P & R'.
10. **Enforcement:** we share with other respondents a concern that a 'blind eye' is turned to parking and sometimes double parking by hotel users e.g. in the Royal Crescent. We are of the view that there should be consistent enforcement for all users.
11. **Other proposals:** we support the proposal to instigate hours of access for delivery and goods vehicles accessing the city centre but would remark that this must be strictly enforced if it is to achieve the desired results; we would welcome sight of comparator cities where this has worked successfully. In addition more creative 21st century solutions to delivery issues should be considered, including an effective freight consolidation service using electric vehicles (learning from any drawbacks of the recently abandoned service).
12. **Cycle storage and car clubs:** both of these proposals are supported.
13. **Students and car ownership:** While students are dis-incentivised or banned from bringing cars to Bath by their respective universities, we do not believe this is adequately enforced. We would welcome closer collaborative working between the two universities and the Council to find ways of enforcing the no-car rules especially for students in HMOs and PBSAs.

Summary

The Trust sees a critical disconnect between the aims of the Parking Strategy and the more long term B&NES Transport Strategy. In order to reduce congestion in the city centre, car use and car parking must be de-incentivised AND alternative modes of transport incentivised for all users in favour of public transport and other sustainable modes of transport. At this stage without the extent of public transport infrastructure needed to properly incentivise both out-of-town and suburban users (cost, frequency and capacity being main considerations), nor safe on-road cycle routes, we recognise that this

Parking Strategy does little more than maintain the parking 'status quo' but with some of the proposals (for example higher on-street parking charges) at least taking steps in the right direction.

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