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**Bath Preservation Trust Response to Milsom Street: Experimental Traffic Regulation Order (ETRO) Consultation**

**Public Consultation**

**26/05/2022**

The proposals, which include an Experimental Traffic Order form part of a package of comprehensive measures to address the ongoing disparity between private car usage and sustainable transport access within Bath city centre.

BPT maintains that any access restrictions should be considered as a broader part of traffic management plans and an overall vision or strategy for the public realm, including plans for high street renewal and regeneration.

Whilst indicated not to be part of the city centre security proposals, it must be acknowledged that the proposed ETRO would further restrict traffic access within the historic city centre in conjunction with further access restrictions to the south.

We maintain the continued need for a holistic vision for traffic access throughout the city centre and its immediate surroundings to better conceptualise how proposed measures integrate with other restrictions and public realm activation measures.

Comments:

* BPT remain supportive of the opportunity for the increased prioritisation of pedestrian and cyclist access into and through the city centre and associated opportunities for public realm improvement, as well as the delivery of enhanced sustainable transport options.
* BPT are supportive of a 6-month trial of the proposed measures to assess their effectiveness in practice as well as highlighting potential access/congestion issues that should be addressed as part of any permanent implementation of restrictions.
* BPT welcomes the possibility of applying a similar restriction ‘buffer’ across the bottom of Milsom Street where it runs into New Bond Street, so there is a clear and sustainable route on the approach up from Union Street.
* BPT maintains that measures should be appropriately balanced against the need to sustain and enhance city centre access for disabled people and/or people with mobility issues to ensure our high streets remain inclusive and accessible for all.
* BPT questions whether measures be introduced to address limited disabled parking bays (e.g. free Blue Badge parking in all council parking spaces, as currently practiced by York City Council)?

Alternatively, Blue Badge drivers could be prioritised along Quiet Street and New Bond Street to facilitate access to on-street disabled parking whilst appropriately managing a possible increase in traffic flow between 10am and 6pm. This could then allow for increased turnover of on-street parking on Quiet Street to disabled parking to address potential difficulties of access restrictions.

* BPT calls for further details regarding how the ‘Dial-a-Ride’ service would work, as well as the criteria against which a request for an access permit would be measured.
* BPT questions whether e-scooters will be permitted the same rights as cyclists in using Milsom Street during restricted hours?
* BPT has heritage concerns regarding the increased density of loading bays along George Street. This road remains in heavy use by private car users as well as delivery vans and HGVs with increasing pressure on the junction with Gay Street and the congested north-eastern access from the Paragon through to Queen Square. We therefore maintain that the intensified service use of this road could exacerbate its status as a traffic ‘pinch point’ and worsen congestion, an effect which would be felt along adjoining streets, to the detriment of the character and amenity of the conservation area and setting of listed buildings.
* Where it is proposed to retain traffic flow through Quiet Street and onto New Bond Street, there could be an opportunity to address and improve conflict between pedestrian and private car users. The junction between Quiet Street and Milsom Street can act as a ‘blind spot’ where traffic can emerge behind other road users. BPT suggests that this could be better signposted to improve public safety and amenity, preferably in a way that does not require excessive signage or other potential clutter, e.g. tactile changes in road surfaces, traffic calming measures.
* Where public seating is proposed along Milsom Street, this should accord with the Bath Pattern Book with reference to designs, forms, colours, and finishes, to ensure a cohesive approach to public amenity space throughout the conservation area and World Heritage Site.

BATH PRESERVATION TRUST  
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