

Valley Parishes Alliance

Protecting & enhancing the communities in the Avon & Limpley Stoke Valley, East of Bath

Bathampton Batheaston Bathford Claverton

Freshford Limpley Stoke Monkton Combe Winsley

The VPA is a cross-county border, parish alliance with its founding members being the above eight parishes (six B&NES and two Wiltshire). Taken together, these parish councils represent some 10,000 residents.

From: *Hugh Baker, Chair of the VPA*

West of England Joint Planning Consultation,
c/o South Gloucestershire Council
PO Box 299,
Corporate Research and Consultation Team,
Civic Centre, High Street, Kingswood,
Bristol, BS15 0DR

Re: **West of England Joint Transport Study: Transport Vision**

Dear Sir,

This letter is the response of the Valley Parishes Alliance to the Consultation on the above.

1 Summary

- 1.1 The Valley Parishes Alliance objects strongly to three aspects of the JTS, viz.
 - a) The proposal to build a road to link the A36 with the A46;
 - b) The proposal to build a Park & Ride carpark in the Bathampton Meadows; and
 - c) The proposal to build a Freight Consolidation Centre on Bathampton Meadows.
- 1.2 We have specific objections to each of the sub-projects above, but an overriding objection to all three relates to the environmental impact that the projects would have on the Avon valley and Bathampton Meadows.
- 1.3 With regard to a link road, our objections are based on the evidence that a link road will not fulfil the objectives of materially reducing congestion and pollution in the centre of Bath. Moreover, although a specific routing has not yet been

proposed, it is clear that both the A36 and A46 are intrinsically unsuitable to carry the inevitable increase in traffic generally and HGVs in particular, that would result.

- 1.4 There is no evidence to suggest that a Park and Ride facility centred on Bathampton Meadows will have any effect at all on the London Road traffic. It is more likely to be under-utilised. It will not result in the London Road having significantly fewer vehicles.
- 1.5 Despite the theoretical benefits that Freight Consolidation Centres (FCCs) are capable of, there is still a startling lack of evidence to prove their efficacy one way or another. B&NES has admitted that the centre at Avonmouth has been a failure.
- 1.6 The above requires rigorous, analytical, evidence-based debate, and not comments which ignore detailed discussion and conclude that it is simply 'common sense'.

2. Environmental concerns

- 2.1 The Avon valley and the Bathampton Meadows lie in the setting of the World Heritage City. The responsibility to protect the WHS landscape setting is set out in international, national and local documents, e.g. 2008 City of Bath UNESCO report; 2009 Government Circular on WHS protection; 2009 B&NES Public Realm and Movement Strategy; 2010 WHS Management Plan; 2013 WHS Setting Supplementary Planning Document.
- 2.2 Any link road would be in the Cotswold AONB and setting of the Bath World Heritage Site. It would, therefore, have (undisputed) severe adverse impacts on the landscape, recreation and tourism, irreversibly blighting the exceptional beauty of the Avon & Limpley Stoke Valley. It would be particularly disruptive to the many leisure users of the Kennet & Avon Canal. A Public Enquiry concluded that a link road 'would have intolerable impacts on the landscape and be devastating to recreational amenity'
- 2.3 Bathampton Meadows lies entirely in the Green Belt.
- 2.4 Most of the meadows lie in flood plain, clearly unsuitable for an FCC or car park. The small area which is not in flood plain is vital as an emergency area to provide for water storage at times of flooding. Moreover, the ability of open pasture to provide for excess water to seep into the ground is not a characteristic of a carpark covered in tarmac. The entire area could not be considered without significant upstream flood defence measures.

- 2.5 It is understood that actual design detail for any of the projects is yet to be undertaken. However, any one of these projects would have a Net Present Value (NPV) which could ever justify the cost of construction compared with the inevitable devastating impact to the natural environment.
- 2.6 All three projects will provide an unacceptable degree of noise (HGVs, car parking, or freight management activities). This will result in an unacceptable effect on residents and wildlife. We consider that this increase cannot be justified in an open and natural environment (Green Belt, AONB, WHS setting).
- 2.7 Light pollution will also be a major factor – particularly with the extended hours of operation required for an FCC.

- 2.8 It is purely a matter of balancing project effectiveness and cost, with the value of unspoilt pastoral countryside, forever lost as a local amenity in the gateway of the World Heritage City. Our view is that the link road and P&R projects will not be effective (will not satisfy their objectives), and that the FCC project is unjustified and should be abandoned. The Green Belt, AONB, and WHS setting are far more valuable and outweigh the devastating impacts of these three projects.

3. Specific concerns regarding a link road

- 3.1 A36/46 Link Road schemes have been proposed many time in the past 30 years - but never considered viable.
- 3.2 Any link road would be in Green Belt, the Cotswold AONB, and setting of the Bath World Heritage Site. We are, therefore, particularly concerned that the route for a link road shown in the Transport Vision would be a bridge structure straddling the Limpley Stoke Valley to link the A363 to the A36. This is equivalent to the option discarded by the Government commissioned Bristol/Bath to South Coast Study in 2004. Such a scheme - whether intended as a Bath relief road or a trunk route improvement - would be extremely expensive but, even with an unlimited budget, it would be impossible to build a structure which could mitigate, by design, the severe adverse impacts of large junctions, gantry signs, lighting and noise associated with thousands of vehicle movements daily on an intrusive, elevated road traversing the valley. A Public Enquiry concluded that a link road 'would have intolerable impacts on the landscape and be devastating to recreational amenity'. This conclusion is unambiguous and remains wholly relevant to the route shown in the Transport Vision.
- 3.3 The A36 and A46 are geologically unstable, requiring frequent closures for maintenance, and are therefore unsuitable for increased HGV and other traffic that would result. Congestion at key times, on both of these roads (A36, south of Claverton and A46, on the Hartley Bends as far north as the A420 and beyond) -could only be aggravated by additional traffic attracted by a link road.
- 3.4 Bath traffic is predominantly local. Government figures show that only 1 in 20 cars represent through traffic. Minor congestion relief will therefore be temporary around Cleveland Bridge and London Road but nowhere else in Bath will benefit. B&NES agrees with this conclusion.
- 3.5 Less than 5% of London Road traffic is HGVs, and only half of that figure is traffic flowing North-South. Replacing this traffic by smaller distribution vehicles (as will happen if an FCC is built) will clearly reduce any benefit which could otherwise have resulted. Through-HGVs could be removed by measures other than a link road. But before any decisions or plans are made, the seriousness of the consequences demand that a full evidence-based case is made.
- 3.6 New roads are invariably proven to induce more traffic unsuitable for the A36 and A46.
- 3.7 Bathampton is on the edge of an Air Quality Management Area with emissions just below EU safety limits and on a rising trajectory, while parts of London Road

already exceed them. A link road attracting more East-West traffic (as shown in Government statistics) could only lead to further rises in emissions levels.

- 3.8 An A36/46 link road proposal fundamentally conflicts with B&NES Council's own environmental policies.
- 3.9 A serious attempt to reduce HGV numbers in the city requires much greater support for Wiltshire's plans to improve the A350 as a genuine north-south trunk route. If this were done, the HGVs would be attracted elsewhere rather than the A36 and A46.
- 3.10 Despite claims of possible benefits there is no proven economic case for a new link road.

4 Specific concerns regarding a Park & Ride facility

4.1 B&NES has recently conceded that a Park & Ride facility to the east of Bath will not reduce traffic congestion nor pollution on the London Road and Cleveland Bridge. This was done via reports to a Planning Inspector in autumn 2016. Since the stated aims of a public consultation in 2015 cannot be met, it is clearly not justifiable to spoil the Bathampton Meadows. It is no longer disputed that any slight improvement in congestion resulting from a P&R will very soon be taken up by the significant suppressed demand, and by attracting those who today avoid the area and do their shopping and errands in the towns of west Wiltshire.

4.2 Park & Ride no longer has the support of DEFRA as a means of reducing congestion and pollution in towns. In 2009 DEFRA Local Air Quality Management Policy Guidance stated 'Park & Ride is unlikely to affect town centre traffic levels, and may simply add to the amount of traffic entering the town'. In 2016 DEFRA completely removed all reference to Park & Ride in its tool kit that Local Authorities should consider in their efforts to reduce congestion and pollution. Instead they recommend behaviour change measures.

4.3 Research evidences that Park & Ride on the edge of cities adds to the number of kilometres travelled (on average 1 to 4 additional kilometres per P&R user). In addition, fewer than half of P&R users would otherwise have driven into the city. The other users are new car trips or people transferring from public transport.

4.4 In November 2015 B&NES Council resolved that an integrated transport plan for the east of Bath was required to provide quality public transport proposals to serve the Wiltshire towns. There are no such plans within the JTS for east of Bath, although substantial expansion in other areas of the WOE LEP is proposed.

4.5 The methodology and modelling tools used by B&NES in the past (for predicting take-up rates for P&R facilities) have been shown to be seriously flawed. Existing sites are, on average, only 41% full, and even at the busiest times average only 60% of capacity. Prior to proposing up to £10m on construction of a new P&R, B&NES must resist using untested assumptions and conduct a thorough patronage study.

4.6 It is now apparent that the only time Park & Ride is well used is during predictable seasonal events such as the Christmas Market which, according to B&NES' Cabinet Member for Transport, increases the take up of Park & Ride by 42%. In 2015/16 Council parking data shows there were 19 days when average Park and Ride capacity exceeded 80%. Of these, 17 coincided with the Christmas Market. The Council has this year secured over-spill Park & Ride for 140 cars at Lansdown North Playing fields for Saturdays during the Christmas Market. If this initiative were to be continued and expanded to manage future peak demand it would remove the need for further permanent Park and Ride Sites, and produce a capital saving of £10m.

4.7 It is critical that investment is focused on solutions that reduce congestion at peak times. Yet, at these peaks, Park and Ride sites are only 25% full. Bath's Park & Ride sites are emptiest when congestion is at its worst, and there is no evidence that the behaviour of east of Bath commuters is any different to those who drive past Park & Ride from other destinations every day.

4.8 Since city centre traffic is already critically high, and is not predicted to reduce significantly with any of the schemes proposed for the east of Bath, it is important for B&NES (and, therefore, the WOE LEP) to concentrate on measures which may change behaviour. A Congestion charging scheme appears to have the greatest potential for such a modal shift. This would inevitably deter residents from driving into the city, and making greater use of existing bus services and other schemes (cycling, walking).

4.9 Concentration on the aspects of congestion which are most damaging (such as the daily school run, which is a significant factor during term times, and the disruption felt when unusual events take place such as Christmas Market and Bath Rugby days), could result in significant gains being made.

4.10 The above issues demand rigorous, analytical, evidence-based debate. The argument must be more than 'it's just common sense'.

5 Specific concerns regarding a Freight Consolidation Centre (FCC)

.1 Proof of the success of Freight Consolidation Centres is difficult to find from the few examples already operating. Despite the theoretical benefits that these ambitious initiatives are capable of, there is still a startling lack of evidence to prove their efficacy one way or another. According to a transport paper published last summer by the University of Westminster, 'to date there has been a lack of evidence-based information upon which potential operators [of FCCs], be they logistics providers or local authorities, can base decisions as to the viability of such initiatives'.

- 5.2 Professor Michael Browne, who helped write the paper, explains 'To get one started, you need public funding. But then, can you actually over a certain period of time get it to be self-supported? For the moment, the answer to this remains unclear - there is little evidence of a consolidation centre being financially viable in the medium- to long-term'. The key is to get retailers to pay for the service. Thus far, however, this has not been possible (except at Heathrow, which has a single landlord, BAA).
- 5.3 It is reported (Bath Chronicle Dec 13th 2016), that the existing FCC in Avonmouth (for which B&NES has contributed in excess of £800,000) is currently regarded as a failure, and ongoing financial support is being questioned. It appears that B&NES is prepared to allow it to fail. B&NES cabinet member for transport, Cllr Anthony Clarke, explained that 'Unfortunately, despite the Council's best efforts to promote the scheme, take-up among local businesses has remained very low'.
- 5.4 With many analysts questioning the viability of FCCs, and B&NES admitting that their own experience has been a failure at Avonmouth, it would seem inconceivable that a proposal to construct another FCC could be included in the JTS. Clearly, without rigorous independent evidence of reasonable chances for its success, the scheme should be scrapped.
- 5.5 Given the above, therefore, we object strongly to indications that it is proposed that an FCC is to be located on the Bathampton Meadows. Once the protection of the Meadows is properly understood (refer to Section 2 above), the further desecration of this site, to accommodate a very questionable FCC facility, should be immediately rejected.
- 5.6 A typical FCC operation includes long hours of operation, and significant noise and light pollution. These characteristics preclude its location in a low-lying bowl of natural meadowland. A proper evidence based study must be conducted to assess other locations which could be far more suitable and less pervasive on the life choices of hundreds of residents..

6. West of England Consultation Questions

We have strong objections to the suggested general questions as the response to the consultation. How, in all seriousness, can any useful information be derived from general questions such as Q1 below? If answers are given without qualification, they must be ignored in any analysis of the responses. They cannot provide any meaningful evidence of support or opposition to the details covered by the consultation.

Having expressed this view, however, the following are the VPA's answers to the suggested questions posed in the WOE Consultation.

The VPA has little knowledge of the Bristol, Weston-Super-Mare and northern fringe areas, and so offers no opinion.

- Q1. Is the level of ambition for the Transport Vision about right?

Answer. In the East of Bath, the vision is entirely wrong. The link road and P&R schemes are now agreed to be of no benefit towards reducing congestion in the city, are of marginal benefit in doing so on the London Road and Cleveland bridge, and so cannot be justified. No evidence exists indicating that FCCs can be made to work, and certainly not without continuing subsidies. No work has been undertaken to indicate that the most appropriate location for an FCC is the Bathampton Meadows. The inclusion of these three projects cannot trump the need to protect the Green Belt, the AONB, and the Setting of the WHS.

Q2. Do you think we are proposing the right mix of public transport (bus, rapid transit, park and ride and train)?

Answer. As stated, a Park & Ride facility on Bathampton Meadows is not justified and should be removed from the plan. Further consideration should be given for a Congestion charging scheme in the centre of Bath.

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?

Answer. In the East of Bath, there is no possible routing of a new road which would not have 'intolerable impacts on the landscape and be devastating to recreational amenity'. A large question on the effectiveness of such a road persists.

Q4. To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors?

Answer. Subject to rigorous assessment of the need, likely effect, and value for money - this should be considered.

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?

We cannot answer this question without specific proposals.

Q6. What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre?

We have no opinion on this matter.

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

- Marketing and education to change travel behaviour.

Strongly agree

- Area packages of improvements for pedestrians, cyclists and buses.

Strongly agree

- Strategic Cycle Routes - new or upgraded routes.

Strongly agree

- Park & Ride - new or expanded sites.

Strongly disagree in the east of Bath. Other sites - neutral

- Bus network improvements.

Strongly agree – particularly with respect to the towns in west Wiltshire.

- Expansion of the MetroBus network.

Agree

- Light Rail routes.

Tend to agree – depends on the specifics.

- Rail improvements – improvements to existing services and facilities.

Strongly Agree

- New railway stations

Agree where feasible

- Road improvements, including junction improvements & addressing bottlenecks

Agree

- New road connections

Any new proposal must be solidly based on evidence and need, an honest assessment of the likely effectiveness. Due consideration must be given to the protection of the environment, and the need to focus first on improvements to the existing road network.

- Freight management including consolidation centres

Chances of success are slim. Strongly disagree with a Bathampton Meadows location.

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

We have earlier commented, at 3.9 above, on plans for further improvements to the nearby A350. Such improvements would enable economic growth across Wiltshire; enhance the strategic function of the A350; and importantly, attract through-traffic, particularly HGVs, away from Bath.

This, together with public transport improvements (bus and rail) in Bath and implementation of other measures (outlined below) to reduce the impact of local and through-traffic, would make the idea of any A36/A46 link road

redundant and achieve the overriding objective of protecting the unique status of *both* The City of Bath World Heritage Site and its landscape setting.

Other traffic management measures which should be seriously considered, include -

- Cleveland Bridge HGV Ban. If further upgrades of the A350 were implemented there should be considerable scope to revisit the DfT's 2012 rejection of B&NES' request for HGV restrictions on Cleveland Bridge.
- Low Emission Zones (LEZs) - HGVs (e.g. London, Brighton, Oxford)
- UltraLEZ - cars (e.g. proposals for London and other cities).
- HGV delivery time restrictions.
- Regional and local HGV signing strategy to direct HGVs away from Bath.
- Congestion Charging scheme in the city centre.

Yours faithfully,

Hugh Baker
Chairman of the VPA

Copy to: Cllr Martin Veal, Bathavon North
Cllr Geof Ward, Bathavon North
Cllr Alison Millar, Bathavon North
Cllr Neil Butters, Bathavon South

Copy for Information to:
Jacob Rees-Mogg MP
Ben Howlett MP

Department for Transport (DfT)
Highways England
Bath Preservation Trust
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Natural England
Cotswold AONB