

Response to the West of England Joint Transport Vision Consultation Ending 19th December 2016

From the Bathampton Meadows Alliance

18th December 2016

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A. INTRODUCTION

We object strongly to the West of England Joint Transport Vision proposal for Park & Ride (P&R) and any other inappropriate development on Bathampton Meadows to the east of Bath, such as a freight consolidation centre, coach park or large Metrobus car park.

By its impact on the 'Setting', such development would damage Bath's exceptional historic and natural environment including the World Heritage Status. This in turn would harm the wider area, impacting on views from the Cotswolds ANOB enjoyed by local people and the many tourists who bring economic benefit to the city of Bath.

Following the first round of consultation, the West of England Joint Spatial Plan makes conserving the function of the Green Belt a high strategic priority, and yet the Joint Transport Vision goes entirely counter to this with its plans for the east of Bath Park & Ride and a Freight Consolidation centre. Unfortunately we no longer believe that the current B&NES administration can be trusted to protect this green environment and the setting of the World Heritage City.

Evidence presented by its own consultants now tells the B&NES Council that existing P&R sites in Bath are underused and that, until usage can be increased, they should take a wait and see approach to any further P&R development. Through reports presented to the Planning Inspector in autumn 2016, the Council itself admits that the provision of more P&R Ride to the east would not reduce traffic, congestion or pollution into and within the City.

Section B of this report evidences why P&R east of Bath would not produce the results required and would waste £10 million of capital investment. For these reasons harming Bathampton Meadows and the surrounding area by P&R cannot be justified since there is no public benefit and the stated aims of the Council's 2015 public consultation on the proposal cannot be met.

We welcome the West of England Vision's strong focus on public transport and make the case at **section C** below for this to be sharpened and extended in a number of ways. We vehemently object to the omission of east of Bath of public transport proposals of the quality supported elsewhere in the West of England. Consultation papers are wrong to describe P&R as public transport, since most of each journey is carried out in the private car. This is all the more the case when potential locations are planned for the very edge of the City, as in Bath.

We also ask you to take into account more fully that DEFRA no longer supports P&R as a sustainable solution in its Local Air Quality Management Policy Guidance (LAQM) Policy Guidance, January 2016). Indeed this autumn, DEFRA has written to B&NES Council recommending that it integrate its Air Quality Action Plan and Transport Plans. It is not yet possible to see from the Joint Transport Vision provided for this consultation how these two B&NES Council plans would align and support each other in line with this guidance, as we wholeheartedly agree they must do.

We are dismayed at the failure of the Joint Transport Vision to include an integrated transport plan for east of Bath, required by the resolution of the November 2015 BANES Council, and at the omission of quality public transport proposals to serve the Wiltshire towns. Yet such measures elsewhere in the West of England have been so effective that the

Vision proposes substantial expansion of them to towns with smaller and similar populations and growth to the Wiltshire towns.

Why has substantial additional investment in genuine public transport in the West of England seemingly been disregarded when it comes to proposals for the east of Bath?

Section C of this report puts forward a series of proposals which would underpin the development of a commercially competitive, quality public transport system capable of reducing traffic congestion and pollution in Bath.

B. GROUNDS FOR OUR OBJECTION TO TRANSPORT INFRASTRUCTURE ON BATHAMPTON MEADOWS

These grounds for supporting our objection to the inclusion of Park & Ride east of Bath on Bathampton Meadows include our objection to indications that a new Freight Consolidation Centre and Coach Park would also be located there.

In addition whilst we would welcome the proposal of an extended Metrobus from Bristol to Bathampton, we would object to any proposals that included the provision of significant car parking on the Meadows.

B1. In April 2016 the Council withdrew its claimed benefits of an east of Bath P&R originally stated in the 2015 public consultation

Evidence in September 2015:

B&NES Council consulted on a Park & Ride to the east of Bath in September 2015, publishing a document that claimed that this would: have impact on congestion and reduce carbon emissions from transport; improve the city's environment; and, ease congestion on the A4 London Road, one of the worst bottlenecks in the city. The phrasing gave no indication that this benefit was either theoretical or for the future and was taken by the public to be an immediate benefit.

Even with these stated benefits the consultation resulted in 51% being against the scheme. The Council report of 12.11.15 which considered the P&R consultation stated that (P&R) 'will have an immediate benefit to traffic on the East of the city'.

Different evidence in April 2016:

New evidence emerged in April 2016 which renders the 2015 consultation invalid. The new evidence demonstrates there would be no environmental benefit from an east of Bath P&R, now or in the future and that there is little or no need for further P&R spaces in the foreseeable future.

New evidence from Council consultant CH2M:

That new evidence is contained in reports prepared for the Council by CH2M for the September 2016 Place-making Plan Inspection:

- Transport Evidence Explanatory Note CD/PMP/B27, Bath: Park and Ride Expansion, responds to the Inspector's questions on Park & Ride.
- Transport Evidence Explanatory Note CD/PMP/B28, Bath: SRN Impact, responds to concerns raised by the Highways Agency about the Strategic Road Network.

Contrary to what the Council stated during the September 2015 Council consultation, Explanatory Note CD/PMP/B27 explains that:

'no transport scheme will improve the capacity of the central road network' and that 'The traffic management proposals for Bath will seek to 'hold' or maintain the existing capacity of the highway network but not increase it to any notable degree'.

Meanwhile Explanatory note CD/PMP/B28 identifies that the reduction in traffic on the London Road as a result of Park & Ride has been previously overstated - and will be very modest indeed for an investment of £10 million.

*'The effect of both Park and Ride options serves to reduce the volume of traffic accessing the A4 London Road from the Batheaston Bypass at the A46/A4 interchange, and thereby the flow attempting to use this corridor to get into Bath. As expected, the effect on the southbound slip-road from the A46 is less. **The 'net' reduction effect in both cases is around 100 vehicles, which is much lower than the overall patronage estimates set out for the different Park and Ride scenarios in Core Documents CD/PMP/B26 and CD/PMP/B22.** This is firstly because the car-driver demand abstracted from the more critical parts of the network during 8:00-9:00am will only be a proportion of the overall patronage attracted to one or more new Park and Ride sites serving the eastern side of the City. Secondly, any propensity for network relief to London Road will tend to encourage other drivers to use the route.'*

Responses to extracts from the West of England analysis of consultation responses to the January 2016 West of England Transport Vision:

The following is an extract from your analysis of the consultation responses:

*'Congestion is seen as a problem that, if solved, would reduce carbon emissions, improve quality of life, and reduce negative impacts on transport in both the built and natural environment'. AND **Congestion has been identified as a key existing problem in the sub region. The JTS will suggest a strategy and new schemes aimed at tackling congestion, air quality and improving quality of life.** Strategic corridor packages that include improved environments for pedestrians and cyclists will be considered as part of the JTS.'*

In the light of these principles and the fact that the Council has acknowledged that an east of Bath Park & Ride will not ease current congestion and pollution:

- Why does it remain in the Vision?
- Why are no strategic corridor packages and Metrobus schemes proposed for the east of Bath when they are for other communities in the West of England of a similar or smaller size?

These questions are further justified by the following extract from the West of England analysis of the consultation responses to the Transport Vision:

*'The environmental challenges that transport presents, including that of **poor air quality**, has been identified as a **key existing problem** in the sub-region... The JTS will suggest a strategy and **new schemes aimed at reducing reliance on the private car**'. AND **'much of our area suffers from limited transport options which results in high private car use.** Strategies to improve the experience of pedestrians and cyclists and to encourage this modal shift is therefore an important component of the study'.*

Existing measures in the Plan for the east of Bath will increase the use and reliance on the private car as set out at B4 below:

- Why are there no Metrobus quality public transport measures for the east of Bath?

We challenge the following statement from the West of England analysis of the consultation responses to the earlier Transport Vision:

'The strategy for P&R sites needs to be developed alongside objectives for the overall transport network. P&R is envisaged to play a crucial role in improving travel choices, particularly when considered alongside parking management policies in city centres'

Park & Ride is a major part of the Vision, but when this has been carefully examined in Bath, by the Bathampton Meadows Alliance and by Ch2m for B&NES Council, both have concluded that it fails to meet the policy aims of reducing congestion and pollution. For example, both have concluded that the previous £4.5 million investment to extend existing sites by 870 additional spaces has not resulted in a further take up of P&R in the city. Therefore the proposed east of Bath P&R would not deliver what is promised and will result in a white elephant. We offer no insight as to the different circumstances and the effectiveness of P&R in Bristol.

We challenge the following extract from the West of England analysis of consultation responses:

'Private car can sometimes be the only option for people in surrounding areas. In Bristol and Bath the P&R services are effective at reducing the number of private car journeys in to the City Centre'.

B&NES does not measure or analyse the impact existing P&R has on congestion and so cannot make this statement for Bath. No evidence has been produced as part of this consultation to show that traffic into these cities has reduced as a result of P&R being introduced. Even if data is subsequently produced, a survey conducted during the Bath Christmas shopping season in 2015, when many people make a destination trip to Bath, concluded that half the respondents would have travelled into the City actively or by true public transport had the existing P&R not been there. This supports wider research into P&R effectiveness which estimated that any analysis produced must be halved to understand actual likely impact.

While the private car may sometimes be the only option, there are solutions that would have a far lower impact, such as Link and Ride - smaller car parks along existing public bus routes. These were proposed to B&NES at the Public Scrutiny Day held in March 2016 by several speakers and were supported by every workshop table in the afternoon session. Their evidence has been disregarded by B&NES Council.

In a report made subsequently to the Scrutiny Panel, the inability of buses to turn in smaller car parks was a key reason given for not pursuing this plan and yet the point of Link and Ride is that buses don't need to turn – they just follow the normal routes and stop adjacent to the road. This proposed measure should be explored again in full to the east of Bath as it would enhance the quality and competitiveness of public transport services for everyone and would

offer far less encouragement to people to leave public transport to drive to P&R. In this way it would be much more in tune with wider West of England objectives.

B2. Wasted investment in past P&R expansion caused by inaccurate Council P&R usage forecasts. There has still been no research to substantiate potential usage

Between 2012 and 2015 B&NES Council added a total of 878 Park & Ride spaces to its three existing sites as part of the Bath Package. The expansions cost £4.5 million and brought the total number of P&R spaces in Bath to 2877.

Despite this past expansion, B&NES Council began its consultation for 1400 more spaces without any assessment of whether the recently added spaces had achieved any reduction in traffic entering the city, or even whether the new spaces were being used. Despite having an automatic car park counting system in place at all 3 P&R the council did not analyse the data it produced.

In February 2016 Andrew Lee of the Bathampton Meadows Alliance, who has 30 years' experience as an Insights professional, presented evidence to the council based on this Park & Ride usage data. He found that the existing P&R sites across a full year, were on average only 41% full - and even at the busiest times of day averaged only 60% full.

In April 2016 the Transport Evidence Explanatory Note CD/PMP/B27, Bath: Park and Ride Expansion prepared by the Council's consultant's CH2M for the Statutory Planning Inspector confirmed this occupancy data. It concluded that there are 1022 unused P&R spaces at the busiest time of an average day.

This led CH2M to revise its forecast of need for an east of Bath Park & Ride from 1600 spaces by 2029 (as stated in their 2014 report) to no more than 400-500 by 2029.

CH2M also drew attention to a report by Mott Macdonald that is also unhelpful to the Council's case. Mott Macdonald's 'do nothing scenario' shows that if you don't build an east of Bath Park & Ride there will be a shortfall of just 112 spaces by 2029.

These Council reports evidence the fact that the proposal for Park & Ride on the Meadows is not a sustainable solution and will not provide any public benefit or value for money for capital expenditure of £10 million.

This situation has arisen because BANES has used untested assumptions and a theoretical modelling tool to come up with this proposal rather than conducting a thorough patronage study with the public - despite this being a requirement of the 2014 Transport Strategy. There is still no clear picture as to why people travel around the city at different times of day and what would motivate them to switch to alternative forms of transport or active travel.

The same methodology and modelling tool was used as the basis for the planning application for expanding existing Park & Ride at Odd Down in 2009. This predicted that by 2013 there would be demand for 1300 spaces. That forecast proved to be entirely wrong: Odd Down is now only 53% full at the busiest time of day with an average of 664 cars parked. The underuse of Odd Down has created a situation where parking spaces have become completely overgrown with weeds.



Odd Down parking spaces September 2016

The table below sets out the peak occupancy of Bath’s existing Park & Rides when planning permission was sought for the Bath Package expansions, and compares this to the most recently available peak occupancy figures for each site.

	Expansion completed	Pre/post expansion capacity	Pre expansion maximum	Post expansion maximum	Net change
Newbridge	Aug 15	450 to 698	450(100%)*	454 (65%)**	4
Lansdown	Feb 13	437 to 837	437(100%)*	494 (59%)**	57
Odd Down	Nov 12	1022 to 1252	850 (83%)	664 (53%)	(186)
Combined		1909 to 2787	1737	1612	(125)

*2009 planning application** Transport Evidence Explanatory Note CD/PMP/B27; Bath: Park and Ride Expansion, ch2mhill April 2016

Overall the use of P&R Sites in Bath has fallen by 125 spaces since planning permission was granted for an additional 878 spaces in 2009. BANES spent £4.5 million on this wasted expansion package. There has been no monitoring by the Council, or by the West of England LEP, to calculate the (lack of) impact of this investment on policy aims.

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 BANES' 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 P&R capacity exceeded 80%. Of these, 17 were as a result of 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

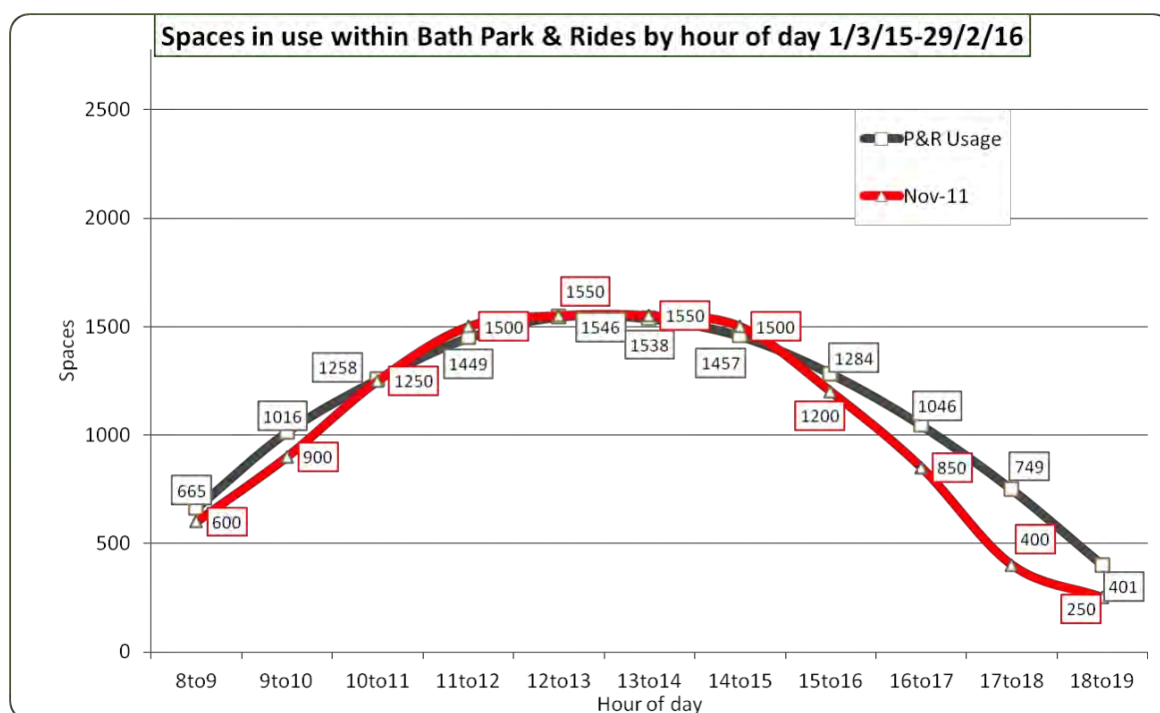
peak demand it would remove the need for further permanent P&R Sites, and produce a capital saving of £10m.

B3. P&R is not an effective tool for tackling peak congestion:

The Transport Evidence Explanatory Note CD/PMP/B27 which informed the 2016 Placemaking Plan Inspection identifies that during the morning and afternoon peak hours the road network in Bath is at 96% capacity and can barely accommodate more traffic growth. Between 8.30am and 9am and between 5.30pm and 6pm average traffic speed in the city is just 8 mph and gridlock can occur. It is therefore critical that investment is focused on solutions that reduce congestion at peak times.

Yet according to the B&NES Council's own parking data, at this time of day P&R is 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.

Park & Ride in Bath is predominantly used by shoppers; occupancy peaks in the middle of the day. This is a trend that has not changed for at least 5 years. The graph below shows in red a survey of Park & Ride use carried out in 2011 which was used in the Transport Strategy. Against this is plotted in black the yearly trend of P&R use today.



B4. DEFRA no longer support Park & Ride:

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 toolkit that Local Authorities should consider in their efforts to reduce congestion and pollution. Instead they recommend behaviour change measures.

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 its users is a target group user that is someone who would have otherwise driven into the city. The other users are new car trips or people transferring from true public transport. (2015 meta-analysis of 40 studies covering 180 Park & Ride across Europe by Zijlstra, Vanoutrive and Verhetsel). Park & Ride is therefore not a sustainable form of transport, despite it being described this way in the Transport Vision

B5. Park & Ride is a discriminatory policy that puts at risk bus services for the wider public. These services have already been compromised east of Bath:

In your analysis of consultation response on the Vision you state:

'Park and Ride is seen as having the potential to abstract from other bus services: it would require careful planning as part of the overall strategy to minimise abstraction from other bus services'.

This confirms the research evidence above: P&R undermines the viability of normal public transport services. Yet in this Vision there is no evidence of the planning suggested or protection and enhancement of public transport in Bath or from Wiltshire towns. (If B&NES Council were to persist with east of Bath P&R - despite all the evidence against - the West of England Vision or B&NES Council should go much further to offer protection for rural bus services to the east of Bath, as agreed in the Full Council resolution in November 2015.) Alternatively they should set out at this strategic level what the 'integrated transport' model and plan signed up to at the Council meeting would look like to the east: it is unacceptable that no such plan has been produced despite the November Council Resolution.

We are very concerned that the Vision, which includes good and sustainable transport measures for the majority of the West of England, relies so heavily on Park & Ride to the east of Bath. As a consequence the policy may not withstand an Equalities Impact Assessment, since it favours the private car owner and excludes those who do not own one. Those without the benefit of a private car are often the most vulnerable in society, including the poor, the elderly and those with disabilities. The capital investment into Park & Ride would be at the expense of more sustainable and more equitable public transport solutions.

The impact of the east of Bath P&R on normal public transport services sits uneasily with your analysis of the consultation responses to the West of England Transport Vision which states:

'Whilst there are no direct implications arising from the recommendations in this report, equalities will be a key consideration of the JSP and JTS'

Lower bus fares from Bath's existing Park & Ride strongly motivate people to abandon public transport in favour of getting back into their cars for part of the journey, putting public bus services at risk. The work of Professor Parkhurst, University of West of England and a European study of 180 P&R sites set out at B4 above confirm the impact. It can be cheaper to get into a car and travel a short distance out of town to an existing Park & Ride than to use a normal service bus from home.

B&NES Council has also failed to support the local community recently by allowing First Bus to cut services to locations such as Bathampton and Larkhall. Bus services are now patchy. For example there is now no service to/from the centre of Bathampton from early evening. Unless people can afford to pay two different bus operators and to walk up a steep hill and cross the fast A36, they now have no choice but to use their cars again for their commute. This has impacted commuters trying to reach the train station and there are families and individuals now travelling their whole journey by car, crossing the city in the process.

The recent bus route changes have created a vicious circle. The new No.12 bus service is used less by commuters than the No.4 was, and this in turn is putting its viability at risk. BANES council congratulates itself that bus use has increased in the city, while at the same time justifying the recent cuts in rural bus services on the basis that the routes are not well used. This in turn will be held up as generating the need for Park & Ride when this isn't the case at all. What is required is an integrated transport strategy that recognises and integrates the need for quality public transport services. The aim should be to have public transport that does not require access to a private car, whether this is for journeys within the city, or to and from the urban area beyond.

B6. BANES Council is not complying with its published planning policies or properly taking into account the harm caused by damaging the Meadows:

Your analysis of the consultation responses to the West of England Transport Vision states:

'The top objectives are to improve quality of life and a healthy natural environment, as well as reduce carbon emissions'.

Yet the east of Bath Park & Ride is proposed in your Vision even though it will do none of these things.

Your analysis also states:

'The location of P&R sites needs to be carefully considered and needs to balance the impact on the area surrounding the site and the impact on the overall number of journeys made by private car'.

Yet the Plan still locates a large car park on Bathampton Meadows, despite little or no impact on congestion and pollution and the numerous planning protections afforded it and set out below.

Evidence demonstrates that B&NES Council has not complied with its published planning policies or properly taken into account the damage P&R on Bathampton Meadows would cause to Bath's exceptional natural environment, historic assets, public amenity and World Heritage Status. The Meadows have multiple layers of planning protection and are not a simple, quick fix for transport infrastructure.

Bathampton Meadows are:

- A core part of the Green Belt that was recently re-confirmed by the Council as being of the highest designation.
- Fundamental to the Setting of the World Heritage Site, itself protected by the Site Setting Supplementary Planning Document, a material consideration at Planning.

The Council's LDF panel reviewing sites in spring 2016 in were told of the 'high and negative impact on WH Status' that would be caused by developing either Meadows site.

- On the City's active floodplain with no guarantee that it will not become a critical part of the city's natural defences in the future.
- Overlooked by thousands of homes in the Conservation Area
- A location right on the edge of the City where pollution levels themselves are almost at EU limit values for Nitrogen Dioxide. There is a case for extending the AQMA to Batheaston as it is.

B7. Objection to indications that the enhanced freight consolidation centre and a coach park are to be sited on the Meadows:

Whilst we support the concept of reducing HGV traffic to give relief to Bath City Centre, more information is required before we can give a view as to the suitability of a freight consolidation centre. Such a facility is likely to further increase the number of Light Goods Vehicles on the congested roads into the City, which are already on the increase as the result of online shopping. There would likely be increased traffic movements in the area if such a hub were to support other commercial centres in Wiltshire.

To plan such a development and a coach park on Bathampton Meadows would go entirely against its protected status and is something to which we strongly object.

The existing Freight Consolidation Centre has been unsuccessful despite investment and promoting it on the ground (as opposed to online). As set out in this paper: <https://democracy.bathnes.gov.uk/mglIssueHistoryHome.aspx?IId=22441&Opt=0> many companies have their own logistics providers and it is not part of planning conditions for new developments such as Southgate, to use one.

Should there be a case for opening one in the future, avoiding sites on the Meadows would be key, especially potential P&R 'site H(+)', where indications suggest the site is being considered. This site's use was previously dismissed on the basis that it is part of the active flood plain with extensive and regular flooding of the whole site (as recently as November 2016).

Instinctively it would seem that any such site should be located near to junction 18 of the M4, to relieve the A46 of HGVs as well as the City centre. But once again, it appears that a proposal is being made for a possible transport solution when no research has been carried out to establish whether such a facility is in the right place or if it would be used.

C. OMISSIONS FROM THE WEST OF ENGLAND VISION OF TRANSPORT MEASURES FOR THE BATH AREA

C1. The omission from the Vision of improved public transport measures to serve the Wiltshire Towns east of Bath:

The analysis of the consultation responses to the West of England Transport Vision states:

*'Of the range of potential transport concepts suggested, those seen as **most important by respondents** were **strengthening and enhancing public transport corridors, walking***

and cycling 'superhighways', 'working better together' and extending the MetroWest local rail services. AND 'Improving bus infrastructure to make bus travel more attractive will be a key priority for the JTS'.

This is not being translated into east of Bath public transport plans in the West of England Joint Transport Vision, like MetroBus and increased rail services capacity. Nor is the need for greater cross-boundary working with Wiltshire on which respondents in the first phase of consultation placed such a high priority.

The influence and growth of Wiltshire towns should be fully taken into account when addressing transport measures for Bath, but there is no mention of this cross-boundary connectivity in the strategy to date.

While the east accounts for only 18% of traffic entering the inner cordon of the City¹, Wiltshire towns are nevertheless critical to the peak flows into Bath. This is evidenced by a B&NES traffic count in July 2013 that established that 58% of peak traffic into Bath from the east comes from the A4 bypass/Wiltshire. In Spring 2016 we heard a higher figure of between 60% and 70% cited at the Public Scrutiny Day on east of Bath P&R proposals. Traffic from Wiltshire towns therefore impacts heavily on congestion and pollution on the London Road artery in particular.

However there has not been the research by B&NES to understand why people travel from the east or elsewhere and it is not clear why these cars are on the road and what might motivate or enable them to switch out of the private car for their journey. With the prospect of devolution giving greater control over public buses, this would seem an ideal opportunity to encourage modal shift from private car to (true) public bus. These drivers are not currently reliant on P&R and need never be, and this would be in line with the measures now recommended by DEFRA in the LAQM Policy Guidance 2016.

The omission of explicit public transport measures to serve the Wiltshire towns is a serious flaw in the Vision because:

- The existing critical impact of the towns on congestion and pollution in Bath is set to grow, with their substantial and continuing growth in population and housing, in the absence of adequate housing provision in Bath & North East Somerset.
- The towns had a combined population of 150,000 in 2011, with growth forecast to 190,000 by 2026.

This further strengthens the Towns' importance as a large, natural travel to work area, which must be included in joint transport planning and measures.

BANES Council's approach to public transport remains city-centric. No public transport proposals have been made for the east of Bath extending into Wiltshire, despite the Vision's extensive proposals elsewhere in the West of England to extend the quality services provided by the Metrobus Network and improve train capacities. In several cases these proposals elsewhere will serve towns with smaller or similar populations and growth to the Wiltshire Towns. As stated previously, Park & Ride is not a public transport solution.

¹ Source: GAB Transport Strategy Background Document and DFT AADV traffic counts at Walcot.

Your analysis of the consultation responses to the earlier Transport Vision includes the following reference

'New bus franchising powers, as part of devolution, will provide greater powers for local authorities to influence fare levels, although it would be a cost implication (for the authorities).'

We recognise the considerable risk and cost of franchising to local authorities at a time when they are suffering large reductions in expenditure. That is why later in this paper we propose that authorities encourage commercial investment and operation through enabling regulations and public works which make for efficient bus operations, and through support and investment in community campaigns and action which promote greater use of public transport.

Combined these actions would make for more reliable and attractive services and more passengers to support their commercial viability and more competitive fares. Quality partnerships of this kind should be more feasible with Devolution to the West of England and the new bus franchising powers. It is already being achieved through Metrobus elsewhere in the West of England.

Why does B&NES Council persist in the east of Bath with plans which propose to wipe out swathes of the World Heritage Site Setting with a scheme, that by their own admission to the statutory Planning Inspector, does not reduce congestion or pollution - before these existing and new opportunities have been fully explored?

C2. The omission from the Vision of specific proposals to accelerate increased use of public transport by implementing national best practice:

Despite the Vision's overall commitment to public transport there are two joint measures which we believe should be added to secure the full potential of what is proposed above:

- Enabling and encouraging sustained campaigns and community action which challenge the use of cars and promote the personal and public benefits of using public transport - to supplement the standard measures currently adopted by local authorities;
- Sharpening school travel planning, and financing measures which have pronounced benefits in this area. This is of particular relevance in Bath given the heightened impact of the school-run criss-crossing across a city with just two river crossings, and substantial in-bound travel to a mix of state provision and private schools and colleges.

A transport study commissioned by the Bathampton Meadows Alliance showed that in our local area during school holiday time, traffic reduced by 30%. A recent count at the Toll Bridge crossing in Batheaston established that 48% of cars in the period around 8am had children in uniform in them. Transition Larkhall have also recently produced their own research on the school run-effect on their local streets which also show a high impact: <http://transitionlarkhall.uk/estimates/community-matters/>

Requests to BANES council for our study to be rolled out across the city has been dismissed by officers, but without any actual evidence to support their position and their declared view that the school run is a 'non-issue' for the city.

Our experience is that the Council in Bath gives low and reducing commitment and support to such measures. Yet with effective analysis and planning and sustained support they would accelerate behaviour change and improve the viability and impact of capital investment in commercial public transport and in traffic and highway schemes. Such an approach would be supported by DEFRA's LAQM Policy Guidance 2016 and indeed in the latest AQAP for Bath, the only measure to have had a demonstrable and positive impact on air quality was local workplace travel planning, which is a similar concept.

C3. The omission of a proposal in the Vision for a train station for Corsham, as part of the proposal for a Bristol to Oxford train service through Bath:

Whilst Corsham lies outside but on the edge of the West of England it is a significant and growing community within the travel to work area and its residents contribute to the congestion in the east of Bath. The West of England Transport Plan includes similar proposals for stations serving smaller or comparable populations and growth within the West of England itself, and these should include Corsham.

C4. We welcome the proposal in the Vision to encourage and support Wiltshire Council to improve the A350 to the South Coast to give relief to traffic and pollution in Bath, especially HGVs.

C5. The omission from the Vision of explicit proposals for selective congestion charging:

In Bath experience shows that the traffic management measures adopted still leave the transport network close to full capacity. This regularly produces gridlock. Its most worrying impact - amongst other serious consequences - is on the reliability, punctuality and viability of public transport. This weakens the confidence of the public and operators, and threatens the main solution to congestion.

Selective congestion charging, with thorough analysis and public consultation on the evidence and impacts could target the priority issues and measures that emerge: whether that's peak demand, high-polluting vehicles, short trips or something else. Further Residents' Parking Zones and the potential of a Workplace Parking Levy should be considered as part of this analysis. We note that a Workplace Parking Levy has already been successfully applied in Nottingham and is also being considered in Oxford, where P&R has been in place for many years. Once pursued, net income should be invested in better and more competitive public transport and as a result help close the funding gap identified in the West of England Vision.

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