

1. Flaws in the project team's approach that are clear from this report:

A. Costs shown are incomplete, escalating and subject to heavy caveats

The estimated capital cost of an east park and ride has risen from £10m to between £14m and £17.5m depending on which site is chosen. Two of the three options offered to the cabinet incur an annual operating loss of either 65K (800 at f) or 115K (800 at F). It is not set out when 1200 spaces at site F would potentially break even.

These capital costs do not include the additional capital cost of expanding Odd Down and Lansdown if an 800 space site is selected on B or F. Nor does it include the cost of operating a connection to the RUH if a 1200 space site is selected.

In order to distance themselves from their own work, there are also these caveats:

*3.2...An initial business case has considered the revenue implications of the proposals, including the operating model for running the site and impact to revenues on the existing sites. However it's important to note that these are initial assessments and **are likely to change as more detail emerges** and will be subject to full approval. This will have to address the non-recurring costs of EDF funding of £1.1m*

6.20...The figures for the detailed business case are likely to change as more site specific information becomes available through future technical studies, yet to be carried out, as well as the effects of external market forces, devolution and the type, basis and terms of any future contract for any new and existing P&R sites

B. Rather than accept a proven under-usage at existing sites, a willingness is seen to try to justify existing usage of park and ride by any means possible, including irrelevant measures and incomplete/misleading statistics and diagrams.

- No quantified mention of current car utilisation of P&R in this entire section entitled 'Use of existing P&R sites' (4.43-4.50)
- Despite clear evidence from Council data to the contrary, this report still claims that existing P&R are 'very successful' without success criteria being set out
- Gives no forecast of cars to come off the road as a result of the project and does not re-state information submitted to the planning inspector that says only 100 cars will come off the peak rush hour by 2029.
- This report switches from (proven low) car usage at existing P&R (a reasonable measure because this project is about taking cars off the road) to passenger numbers/growth as a measure of success at existing sites. This is misleading as the data contains the three public bus stops each bus can stop at on its route into town.
 - In reality, planning reports from 2009, when permission was given for this expansion showed P&R occupancy at the busiest time of the week to be 1737 across all three sites¹. In April 2016 Council's consultants CH2M updated the park and ride occupancy figures and showed the occupancy at the busiest time to be either 1612 across the three sites or 1762 if Sundays were excluded². Across all days there is a

1 Planning reports stated Newbridge with 454 spaces, and Lansdown with 437 spaces were both 100% full and that Odd Down with 850 spaces was 83% full, giving a total of spaces used at that time of 1737

2 Transport Evidence Explanatory Note CD/PMP/B27; Bath: Park and Ride Expansion, ch2mhill April 2016 shows; updated occupancy figures show Newbridge now averages a maximum of 454 vehicles, Lansdown has an average maximum of 494 vehicles and Odd Down has an average maximum of 664. An overall average maximum of 1612 spaces occupied

reduction of 125. When Sundays are excluded from the calculation the average maximum occupancy across all three sites is just 25 more than in 2009.

- A cursory glance at Figure 6 (total weekly passengers) on page 21 shows that the 16% growth in passengers trumpeted is being driven by Christmas. The Christmas Market parking peak is not disputed. If you add more spaces and they fill at Christmas then this does not mean you need a year round P&R to the east. Instead you need an overspill parking solution.
- Charts aren't sourced honestly:
 - Currently called 'Total Weekly Passengers', Figure 6 should be titled 'Total weekly bus passengers along existing P&R routes from car park to destination stopping at 3 public bus stops 2013/14-2016/17' and the source being where the data comes from, not a repeat of the title. Despite being the chart referenced in the sentence citing the increase in passengers from 2009, this Figure only starts in 2013!
 - Currently without a title on the chart, figure 7 would appear (with some effort on the part of the reader) to also be passengers per site per year including those alighting at bus stops into town 2008/09-2015/16. Source is unknown – currently called 'bar graph'. Giving a total like this entirely hides the Christmas market peak effect and without capacity levels marked on the chart for comparison is very misleading.

2. Inadequacies, omissions and misleading statements, which make the report an unsound piece of analysis

A. Unclear and inappropriate recommendation (Section 2)

The Recommendation to Cabinet is misleading to Councillors and to the public. It has two possible meanings; either

- a. Cabinet is being asked to choose between A or B, or
- b. Cabinet is being asked to authorise both options and to delegate the final decision to the Strategic Director, Place (as recommended by 2.3).

The second interpretation appears to be what is intended; it would certainly allow for such interpretation when written up in the minutes. This would be especially so if Cabinet were to agree the Recommendation in its entirety, rather than voting on each component point of the Recommendation individually and sequentially.

In that scenario, Cabinet would not be choosing a site at all, they would be agreeing to allow the Strategic Director, Place to make that decision for them. By default, the likely implication of this is that Cabinet would be choosing to put a 1200 space park and ride on site F, since, as stated at 8.2 of the report this is the clear preference of Officers. But only 15% of respondents supported site F during consultation.

Such an outcome is not something that is transparent or acceptable to the voting public, who expect their elected representatives to make important strategic decisions on their behalf. It is also contrary to the Council's Scheme of Delegation, Section 4E which requires that significant decisions of this kind are made by elected members. Equally it is not transparent as far as the placemaking process is concerned. The 2013 Halcrow high level review is included as a core placemaking examination

document – in here the now preferred site F is the one site named as definitely *not* on the table in Halcrow.

B. Misrepresentation of CH2M report

At section 4 The Cabinet report quotes from CH2M2 but the paragraphs are chosen selectively and do not accurately represent the consultant's report.

At 4.41 the report claims that CH2M conclude that 600 spaces will be required shortly after the development and occupation of the North Quays site between 2018 and 2022. This is incorrect, the report does not specify that even 600 spaces will be require to the east, and does not say they will be required between 2018 and 2022.

Hill actually concludes the following;

At present, the average overall utilisation of the three Park and Ride sites is circa 63% with usage on Sundays excluded. This equates to existing spare capacity of some 1,020 spaces of the 2,787 available. In considering the timing of any additional Park and Ride capacity needed, it will be necessary to monitor and review the take-up of this existing spare capacity as the build-out of already 'committed' development continues or takes place. This review will also need to take into account other planned EA development as specific applications come forward and the delivery programme is better understood;

CH2M suggests that existing spare capacity can be used in the first instance and then that Lansdown and Odd Down can each be expanded by 300 spaces each. CH2M does not at any point forecast a need that is greater than 400- 500 spaces east of Bath, but says;

This delivery strategy would add around 1,000 new spaces to the overall Park and Ride capacity around Bath, whilst meeting a clear demand for a new site serving the eastern corridor. The current patronage forecasting work does not suggest a demand for greater provision than this by 2029.

CH2M qualifies this statement by saying;

Although the analysis of potential unmet parking demand associated with the EA developments suggests that need in the longer term could be greater. This will depend on the successful delivery of other measures to limit car use and provide greater travel choice, notably the delivery of planned rail capacity improvements. As such, there will remain a need to assess/review the case for capacity expansion beyond an initial strategy for delivering around 1,000 new spaces.

C. Misrepresentation of the public consultation.

The consultation identified a number of transport related issues that have been omitted entirely from this report:

- Congestion on key corridors within the city and at off-street car parks
- Increased journey times and poor journey reliability
- Poor air quality
- Adverse impact on the World Heritage Site and the tourism economy

This report has also reversed the order of the public consultation objectives vs what was printed for the public, deprioritising congestion and pollution. They have also added wording. See Bold for changes

2015 Consultation	Jan 2017 decision paper para 9.2
<ul style="list-style-type: none"> To reduce congestion within the city and around our off-street car parking sites To improve the city's environment To reduce car use into the city centre and improve the proportion of journeys made by public transport To reduce carbon emissions from transport To support the city's economic development and Enterprise Area To improve connectivity to support business and growth of the wider region 	<p>a. To support the city's economic development and Enterprise Area</p> <p>b. To reduce congestion within the city and around our off-street car parking sites (which we hope to redevelop)</p> <p>c. To improve the city's environment</p> <p>d. To reduce car use into the city centre and improve the proportion of journeys made by public transport</p> <p>e. To reduce carbon emissions from transport</p> <p>f. To improve connectivity to support business and growth of the wider region</p>

We raised and discussed in detail the need to restate issues and objectives when we met Council Chief Executive Ashley Ayre in October 2016 and this has not been done. Unless this is done, success criteria do not exist to measure this project by. We believe restated aims and objectives should be consulted on publicly.

D. Misrepresentation of the World Heritage Site Management Plan

<p>Report says:</p> <p>4.11 The main aim of the plan is to ensure that the outstanding universal value of the site and its setting is understood, protected and sustained...The report identifies that transport and movement around the WHS is a major issue which needs to be addressed and states that "Roads can therefore be congested, with resulting air pollution and other detrimental impact on residents and businesses". Objective 3 of the plan identifies the need to "work to control traffic growth and harm, and encourage and promote less car use, especially in the city centre". The plan also identifies the issue of through traffic in the city and the air quality issues that arise as a result. Action 26 of the plan identifies the need to "support actions to reduce air pollution, primarily caused by petrol/diesel powered vehicles, which is a direct risk to people & historic fabric within the WHS"</p>	<p>We say:</p> <p>Highly selective quoting and interpretation. The very first line of the Vision is:</p> <p><i>The Outstanding Universal Value of the City of Bath World Heritage Site will be <u>conserved and enhanced for this and future generations.</u></i></p> <p><i>...The impact upon the Outstanding Universal Value will be a key consideration in all proposals for change, recognising that small-scale incremental change can be as influential as major interventions. <u>There will be a strong presumption against development that would harm the Outstanding Universal Value of the World Heritage Site itself, or its setting.</u></i></p> <p>The Setting is one of the six headline Universal Values and has its own Site Setting Supplementary Planning Document specifically to protect it which isn't even mentioned in the report.</p> <p><u>Stating that an aim of the plan is to reduce congestion and pollution without balancing this with an acceptance that a new P&R will not do this is highly misleading. This admission is buried in the Council's Q&A (no. 18).</u></p>
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E. Omits to say that an EP&R will not benefit pollution - this is buried in the 80-page accompanying Q&A

It is wholly unacceptable that a Conservative manifesto and subsequent P&R public consultation both promised to deliver an improved living environment for residents now, but the fact that this will not happen via a P&R is buried in an 80-page Q&A document (Q.18). This fact should be core to a Cabinet paper that requests Councillors select a site as it is fundamental to the case of benefit vs harm.

Defra has written privately to B&NES in Summer 2016 advising them to integrate their transport and air quality plans. The council has ignored this. Were they to do as advised, they would need to acknowledge that Defra local air quality policy guidance no longer mentions P&R in the list of initiatives recommended to improve pollution. This clearly calls into question why we even have P&R on the table at all. Instead Defra advise behaviour change programmes and stick and carrot measures such as congestion charging and travel plans.

F. Omits alternatives for consideration

References are made to the Getting Around Bath Transport Strategy as an integrated set of transport solutions, and to plans to 'improve bus services key to helping those from further afield to get into and out of the City' when they are omitting: metrobus expansion into Wiltshire despite wholesale commitment to it throughout the rest of the West of England; school run solutions; and, targeted, innovative ways of shifting behaviour from car to greater bus usage.

In fact the GABTS is predicated on removing cars from the historic core via P&R. If this has been shown not to be achievable, money needs to be put into finding a plan B instead.

G. Numerous further omissions and misleading statements litter the report. We had started to comment on every paragraph, but are now building this into an Appendix for subsequent publication and instead have had to pull out highlights here:

1. An out of date Placemaking P&R policy ST6 has been included (i.e. the original one, not the one currently being consulted on for change)
2. Wrong planning designations on the map in appendix 1 – the WHS Site boundary has been labelled as the Site Setting boundary, which stretches for many miles further, falsely giving the impression that the potential sites are outside the WHS setting
3. Informal agreement with the planning inspector cited, which would be against council process
4. Houses overlooking sites on the Box road listed as a reason not to proceed here in the report, but the thousands of homes overlooking the Batheaston basin not even mentioned
5. The report fails to mention that the Box Road sites are brownfield, which is a relevant consideration when weighing planning decisions and has failed to give weight to any of the local planning policies which would help inform judgement as to which site was more deliverable (note: we are not arguing here that a site is desirable – instead making the point about the error)
6. Next steps for what the £0.5m is to be spent on are not set out
7. No mention in the report of the duty of care for residents today, especially when it comes to illegal air quality. No mention of the Defra guidance on transport initiatives to reduce pollution – a series of transport options in which Park and Ride no longer features
8. Highly selective quoting and interpretation of the WHS Management Plan and no mention of the fundamental Site Supplementary Planning Document

9. Shift from using RUH patient numbers to justify a larger site to staff travel plans. This proved unsuccessful at Odd Down due to shift patterns and staff parking being available on site. Figure 8 showing where RUH staff live is not evidence of need for a P&R and indeed shows that the existing Lansdown site would be potentially acceptable, were there demand for P&R from employees. Has anyone asked staff if they want to use one, are they willing or able to travel by public transport etc?
10. 4.20. Commuters once again the focus of east P&R success when it is quite clear today that existing P&R are emptiest when congestion is at its worst. NO attempt to explain how driver behaviours will change
11. Restatement of items 'discussed' at the public scrutiny day, where **no** such discussions occurred (4.29 recommendations 4 and 5 and around link road and RUH travel plans)
12. Evidence of where drivers come to existing sites from taken from surveys at Christmas when Bath is a destination rather than year round usage. Exaggerates year-round reach.

Our full appendix of errors will be published in due course

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