## **Summary of Bathampton Alliance report**

This summary sets out the main findings from studies carried out by the Bathampton Meadows Alliance, details of which can be found in the report, and power point presentations given to Louise Fradd and Cllrs Warren and Richardson at a community meeting on the 1<sup>st</sup> February 2016.

The main conclusions to note are these:

- 1. Usage assumptions supplied by B&NES to support P&R to the east are seriously flawed. The process to choose a P&R site to the east of Bath must therefore be stopped
- 2. Traffic and emissions are rising to the east of Bath. Increasing this further by providing a P&R would cause emissions to exceed EU limits. Where it is shown that a development would cause a breach of EU emissions limits, a planning authority must refuse permission.
- 3. B&NES assumptions on P&R usage at existing Bath sites are incorrect. Existing P&R sites are on average 50% full and only 25% of the users are commuters. P&R sites only reach capacity when there are predictable and manageable events. Peak demand can be managed by overflow parking. Therefore unless Banes significantly changes driver behaviour patterns, sufficient general P&R parking capacity exists to serve the Bath area for the foreseeable future.

### 1. Flawed traffic predictions and usage assumptions supplied by B&NES

The model the council has adopted to predict need for a Park and ride to the east is seriously flawed. The current usage prediction and its impact for commuters is out by 70%.

The council has stated that 2,000 cars will be taken off the city roads each day by an east P&R (based on 1.5x usage of each of 1400 spaces). This takes no account of the behaviour change that has been consistently observed with P&R. 50% of city-fringe P&R users are new trips, detours or abstraction from public transport<sup>1</sup>

# Applying this factor means that only 1000 cars are likely to come off the London Road not 2000

The council has stated that 45% of the car journeys will be commuters<sup>2</sup>. From the over estimated figure of 2000 car journeys a day coming off the London Road, the council has therefore suggested that 900 would be commuters and 1100 other users. However, as stated above a figure of 1000 is more accurate. Andrew Lea

<sup>&</sup>lt;sup>1</sup> Zijlstra, Vanouttrive and Verhetsel 2015 meta-analysis of 40 park and ride studies

<sup>&</sup>lt;sup>2</sup> 2009 surveys at existing park and rides and a December 2015 Cabinet question response

has shown (see 3 below) that only 25% of users who would otherwise have driven in to the city would be commuters and 75% would be shoppers and day-trippers.

Therefore, based on the council's figures only 250 existing commuters are likely to park and ride each day to the east and 750 are existing shoppers and day-trippers

The total commuter parking demand for the City itself from those living outside Bath and working in it is 2,590 according to the Transport Strategy. If we even roughly apportioned 25% of this to each direction then only 648 would come from the east needing to park, not the 900 predicted by the council based on 2009 surveys at existing P&R.

However, there have been no behavioural studies conducted as to whether people have any need for or any intention of using an East Park and Ride, either for their commute, or for other parking reasons, Until Banes properly maps out the reasons for travel from the East, they will not find the most appropriate and sustainable solutions

If 250 commuters and 750 other car users were taken off the from the London Road each day it is highly likely that this spare capacity would be quickly taken up by suppressed demand.

More than 1,000 people daily pay for the toll bridge and head into Bath, how many would switch to London Road if the traffic moved more freely?<sup>3</sup>

### 2. Traffic and emissions to the East of Bath

Between 2010 and 2014 traffic on the London Road west of the A46/A4 roundabout fell by 14%. At the same time traffic to the east of the roundabout increased by 8% on the A46 and by 11% on the A4  $^4$ 

During the same period emissions at Lambridge on the London Road West fell by 5% (although they are still illegally high) while at 240 London road, east of A46/A4, they increased by 15% and are on a trajectory to exceed EU limit levels.

The council has predicted that 2000 cars would be attracted to an east of Bath P&R. Given the behavioural change highlighted above this would mean 1000 cars would be taken off the London Road, but an additional 1000 new trips would be made to the Batheaston area. The European study cited above also concluded that everyone visiting a city-fringe park and ride travelled between 1 and 4 km further than they otherwise would have to drive into the city.

This area is very sensitive in terms of air quality and unless positive steps are taken reverse this trend the annual mean standard of 40 ug/m3 will be exceeded.

<sup>&</sup>lt;sup>3</sup> Toll Bridge numbers and Bathampton residents traffic survey 2015

<sup>&</sup>lt;sup>4</sup> Department of Transport Annual Average Daily Flows

Nick Davey of Entrans has shown how an increase in 1000 vehicles in the local area would result in such an exceedance. This would clearly result in health impacts, be contrary to policy and work against the Council's efforts to improve air quality in Bath

Moreover, Planning Authorities have a duty in their decision making to achieve compliance with the EU Air Quality Directive 2008. Where a development would cause a breach in the locality of the development they must refuse permission.

Where a development would in the locality either make significantly worse an existing breach, or significantly delay achievement with compliance with limit values it must be refused.

## 3. B&NES assumptions on P&R usage have been shown to be incorrect

Andrew Lea from the Alliance has produced a complete yearly trend for the usage of existing Park & Ride in Bath for the whole of 2015. This trend is derived from B&NES own data but has never been collated in this way by the council itself.

This has now been shared with B&NES and clearly demonstrates 3 things;

- On average the existing park and ride sites are less than 50% full
- 75% of the users arrive after the morning rush hour and leave before the evening rush hour – they are therefore not the commuters who cause the congestion and subsequent high levels of emissions that concern the council and its citizens
- The P&R sites very rarely reach capacity. This only occurs when there are
  predicable events such as the Bath half marathon, university open day,
  rugby and the Christmas Market. The Alliance has suggested that the
  council adopt proper demand management measures and use sites such
  as the Race Course to meet seasonal peaks.

The current P&R sites have spare capacity across the day of between 1173 and 2804 free spaces. When a new P&R opens some users switch, this would further reduce the usage of the 3 current sites.

At the busiest time of day they are on average 58% full. Applying this figure to a 1400 space site east of Bath would mean that a maximum of 812 spaces would be used at a time when there were 1173 spaces available at other sites.

The current transport plan runs to 2024 and has defined objectives, through improved travel choice, to reduce the number of car journeys. As this is the objective of the plan and since unused capacity exists at other sites there is no justifiable case to build a P&R to the east of Bath.

Any argument that there is need to develop spare capacity beyond 2024 is premature and not supported by evidence of need nor by policy.