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5nd June 2016

Dear Chris Banks

We are writing to you as representatives of the Bathampton Meadows Alliance to respectfully ask whether the planning inspector is able to take a late, but crucial submission on the Bath and NE Somerset Placemaking Plan.

The Bathampton Alliance (BMA) is a community based organisation established to protect Bathampton Meadows from inappropriate development, including a current plan by Bath and NE Somerset Council to build park and ride (P&R) for up to 1600 cars on Bathampton Meadows which is both Green Belt and within the setting of the UNESCO World Heritage site.

We have been in discussion with the council on this issue since last September and have submitted a great deal of evidence to the council. This includes an in-depth analysis of B&NES own parking data collected by the council but not analysed by them or used to inform policy decisions. The BMA gave a presentation and report to Cabinet members and the Director of Place, Louise Fradd on the 1st February 2016, and a 79-page report and power point presentation given to a Scrutiny inquiry Day on the 22nd March 2016.

Despite this involvement and dialogue the council did not draw our attention to the fact that P&R was to be included as a policy within the Placemaking Plan in order that we could make a timely representation on this subject. Neither have they amended the Placemaking Plan in the light of the evidence presented to them by the BMA.

Our concerns about Policy ST6 are set out in the attached submission. We would be happy to supply any further documentation or to give verbal evidence to support this representation if required.

The following documents supporting this submission are also attached

- Bathampton Alliance Scrutiny report (see sections 5, 6 and 10 in particular)
- Park and Ride Analysis of RUH projections (PP slides)
- CH2MHill report
- Council report of the 12th November 2015 on P&R
- BMA response to the Scrutiny report and LDF Report
- Letter from Peter Dawson to Sian James

Bathampton Meadows Alliance submission

The Bathampton Meadows Alliance believes that Policy ST6 should be deleted from the Placemaking Plan in its entirety on the basis that:

1. the council has not demonstrated the need for additional P&R. Specifically B&NES cannot demonstrate that its existing P&R sites are effective and has disregarded the council's own parking data which indicates low demand for P&R
2. ST6 does not have an evidence base. It has been imported (with some amendments) from saved policy T22 of the 2007 plan. It builds on aspirations, rather than evidenced actions, from the Getting Around Bath Transport Strategy and relies on a consultation on P&R to the east of Bath that was flawed in its approach and actually resulted in a majority against the proposal. The evidence of need presented during consultation and in the subsequent council report was highly selective, and inputs into traffic models have been inappropriately manipulated to support this strategy.
3. the CH2MHill report, cited subsequently by the Council as the evidence of need for an East P&R was withheld from cabinet when the Transport Strategy was adopted. It was withheld from the public during the public consultation on P&R and once published on 10th November 2015, it was selectively quoted in the Council report of 12th November of the same year that recommended approval of a P&R to the east of Bath.
4. the council has disregarded public opinion, including the consultation result. It has refused to answer questions to council from the public on P&R during the consultation period or at a Council Meeting debating this matter

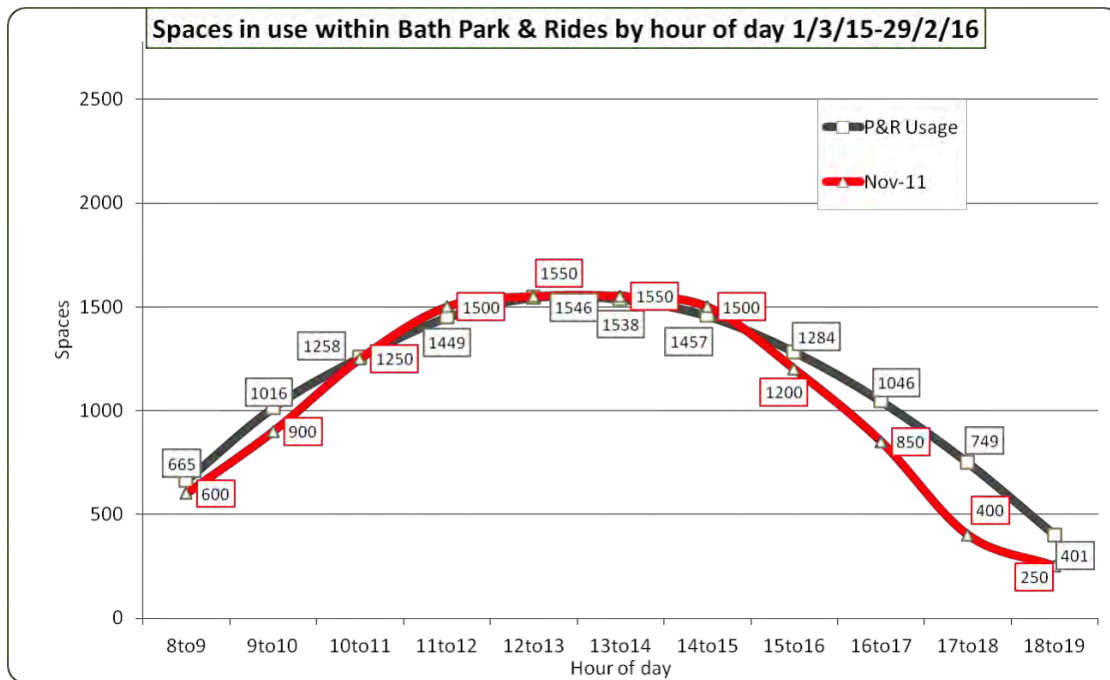
1. The need for P&R

The council has a long established policy of Park and Ride as a means of reducing congestion into the centre of the City, but that policy is flawed. The council has not monitored the efficacy of P&R and has no evidence that the existing P&R sites have done anything to reduce traffic or emissions in the city.

B&NES has not demonstrated the need for increased P&R spaces. Based upon B&NES own entry and exit data the 3 existing P&R sites are on average less than 40% full and only 57% full at the busiest time of day.

Demand for P&R has not increased over the last 5 years. A survey in 2011 used in a background document to the Transport Strategy showed 1550 spaces used at the busiest time of day. The annual usage figures for the 12-month period to March 2016 show 1546 spaces used at the busiest time of day.

This is illustrated on the graph below, please note that the daily trend is a bell curve with the busiest period in the middle of the day.



In 2015 an additional 248 P&R spaces were provided at Newbridge, but after a full year of operation P&R usage across all 3 sites had only increased by 19 cars on average a day.

This evidence is derived from the council’s own strategy documents and parking data. It was presented to the council at a community event on the 1st February 2016 and at a Scrutiny hearing on the 22nd March 2016 but has not been used to inform the draft Placemaking Plan. See section 5 and 6 of the Alliance Report to Scrutiny for full information on P&R usage.

2. Selective use of evidence

Policy ST6 is not evidence based but appears to be driven by political dogma. The current administration was elected on a pledge of consulting on a P&R facility to the east of Bath and despite all the evidence put forward as to why one isn’t the solution to congestion issues, they still appear determined to build one.

The council has dismissed academic research showing that P&R increases Vehicle Kilometres Travelled and so creates more congestion and emissions on the periphery of urban areas where they are located¹. Evidence of this was

¹ Zijlstra, Vanoutrive and Verhetsel (2015) A meta-analysis of the effectiveness of park-and-ride facilities.

given to the council by Graham Parkhurst, Professor of Sustainable Mobility at UWE at a Scrutiny Inquiry on the 22nd March 2016, but was omitted from the Scrutiny report in its entirety and has been given no credence by the council. The Council is also aware that DEFRA no longer suggest P&R as a way of relieving traffic in cities but have also disregarded this. A full response to the Scrutiny Report and the LDF report (an internal council report considering potential P&R sites) is attached.

Regardless of mounting evidence that P&R is not effective at meeting policy aims and that no further demand exists in Bath for P&R the council plans to add a further 2200 spaces by 2029 in addition to the 2777 spaces that exist today.

Policy ST6 relies upon previous work carried out to support the adoption of the Getting Around Bath Transport Strategy, including the Halcrow report cited at 623 of the Placemaking Plan.

It should be noted that the Transport Strategy does not commit the council to increased P&R, rather it requires the Council to establish the 'need' for increased Park and Ride and to undertake a 'detailed assessment of sites'.

'Policy GABP8: Establish the need for increased Park and Ride capacity as part of a wider parking strategy and to undertake a detailed assessment of sites to the East of the City, with an initial bus based facility if needed while a railway site is developed.'

Action GABA18; Identify need for increased park and ride capacity and detailed assessment of sites through the placemaking plan as part of a wider parking strategy

The Halcrow report produced in 2013 considers a number of sites, but cannot be the '*detailed assessment of sites*' required by the Transport strategy since it predates the adoption of this strategy. No other '*detailed assessment of sites*' exists, or if it does this has not been made available to the public.

Halcrow states at page 2 that the review;

'does not make any assessment as to the potential patronage which particular 'alternative' sites may achieve. This will clearly be critical to the business case of any site chosen to serve the A4 and A363 corridors on the east of Bath; but estimating this would require detailed modelling work outside the defined scope of this review'

No detailed patronage study has ever been carried out. The council has latterly commissioned Mott MacDonald to undertake modelling work, but the surveys used as inputs to this model are limited and at best two years out of date. They were carried out in 2009 and 2014 all over the city, not just to the east. These surveys asked where someone came from and where they were going to and whether they would pay for parking on arrival, but they did not mention P&R at all.

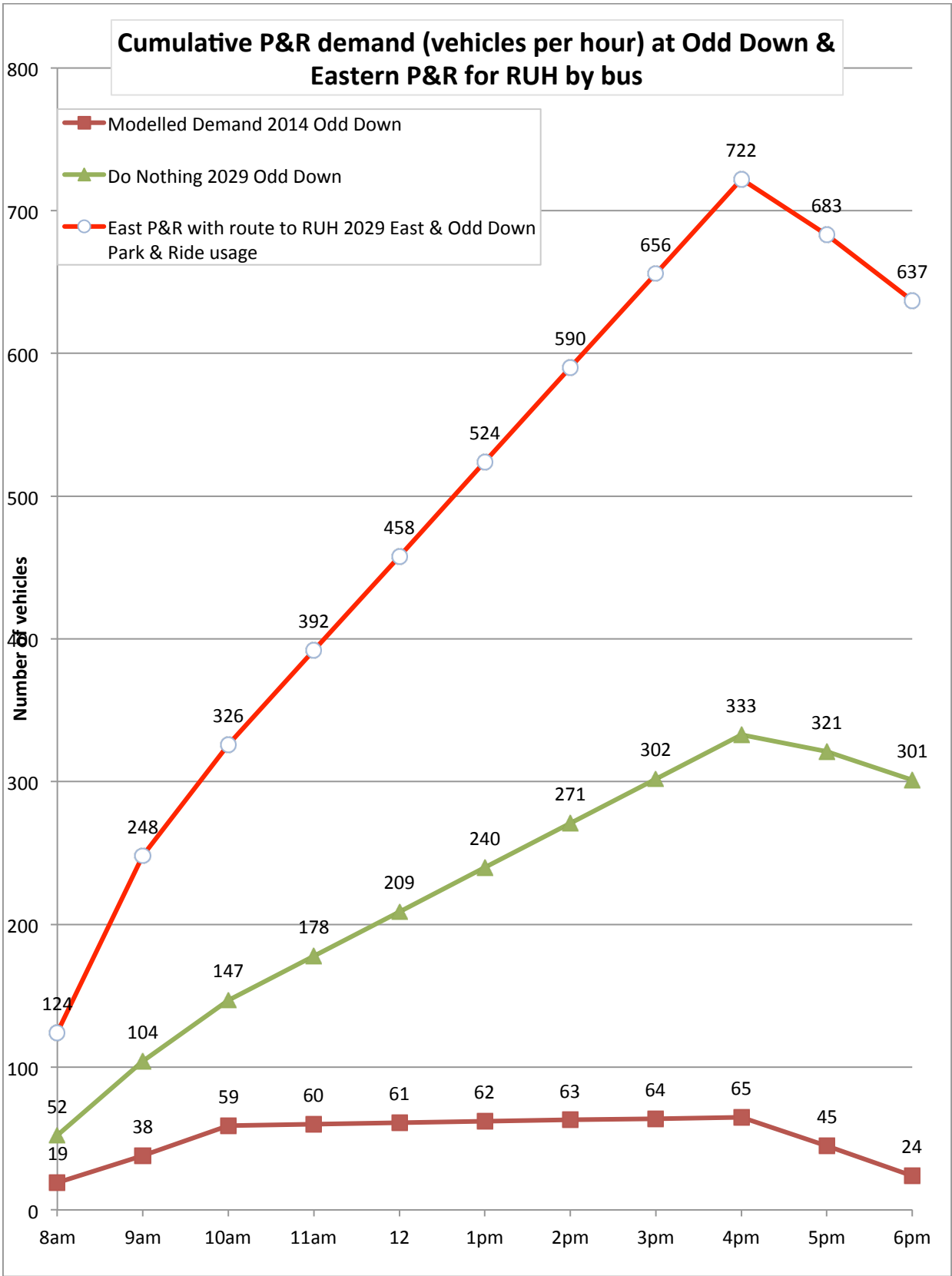
The Mot MacDonald model has been extended to show the impact of adding a bus service from an east of Bath P&R to the Royal University Hospital (RUH) located west of the city. This increases the forecast demand by a third. The RUH has not requested this service nor have they given the council any data to support this need. The projection does not take into account patient feedback, behaviour or needs, the fact that the hospital has just started to work to double their own parking spaces (adding 300 public spaces) or the fact that the NHS plans to deliver more treatment outside the hospital and nearer to communities in the future.

The proposal for an RUH bus was not debated at the Scrutiny Inquiry Day into Transport to the east of Bath held on the 22nd March 2016, but inexplicably became a recommendation in the Scrutiny report. This is despite the fact that neither the chair of the Scrutiny Inquiry, Cllr John Bull, nor any members of the BMA who attended can recall any discussion of this proposal. A full response to the Scrutiny Report and the LDF report (an internal council report considering potential P&R sites) is attached.

The Mott MacDonald projection results in a usage trend never previously observed in Bath. While the 2014 baseline model follows actual data and show the recognised bell curve of usage, the projections to 2029 results in a usage trend that rises sharply during the day without coming back down in the established way.

- This trend shows a peak at 4pm rather than the middle of the day
- When looking specifically at vehicles whose owners are going to the RUH this accounts for 13% (53 vehicles per hour) of total Odd Down users in 2014, by 2029 this projection has increased to 28% or 223 vehicles per hour (four times more than 2014)
- This usage accounts for 28% of Odd Down P&R users compared to 12.5% in 2014 who went to the RUH in 2014
- The 2029 projection shows no decrease in cumulative users through the day as with 2014. So that by 6pm there are still 301 cars at Odd Down P&R whose passengers are in theory still at the RUH. This is over 12 times higher than the 2014 model
- The projection shows a 900% increase in usage of Park and Rides to the RUH by bus in 12 years

It would be very difficult to justify the projections as even being close to the potential reality of RUH bus usage from Odd Down and the Eastern Park & Ride. The numbers appear overinflated at best, providing no alignment with trends or behaviours and at worst a means to get to a high number to justify a large Eastern P&R. Please see the attached report of Park and Ride analysis of RUH projections for further information.



3 The CH2MHill report

The CH2MHill report was cited during public consultation and in the Council report of 12th November 2015 as providing the evidence of need for a P&R to the east of Bath. But this report was not made public during that consultation and was withheld from councillors for a year after its publication despite it having major implications for how P&R policy was to be taken forward

The CH2MHill report was in its final draft at the time that the Transport Strategy was put before Cabinet on the 12th November 2014, but was not made available to Cabinet members as part of the Transport Strategy package for adoption.

The CH2MHill report is dated 14th November 2014 (two days after the Transport Strategy was adopted), but has never been formally adopted by any council body.

The CH2MHill report was available at the time of the public consultation into a P&R to the east of Bath, but was not made available to the public at this time despite repeated questions about evidence of need for such a facility.

The CH2MHill report only became public two days before the full council debate of the 12th November 2015 when Councillors approved, in principle, a P&R to the east of Bath. That decision was made on the basis of an officer report that included consultation results and cited CH2MHill as the evidence of need.

The CH2MHill report is an extremely complex and confusing document. It would be surprising if any councillor had time to read it in the two days they had before passing the November 2015 resolution on an East P&R, or more importantly understand it before making this decision. This is especially so in the light of the selective way in which it was quoted in the officer report. For example, it did not quote the section that explained that traffic in the city would not improve as a result of expanded P&R. This crucial section sets out that traffic would be broadly the same with the London Road (to the east) being slightly better in the morning, but worse in the afternoon peak. This is despite the stated aim of the P&R consultation being to find a solution that would ease congestion and improve air quality.

With regard to the content of the CH2M Hill report:

- It was not commissioned to establish parking demand (this had been established by a simultaneous report by Mott MacDonald to support the Transport Strategy), or the need for P&R
- Its only role was to consider the effect on traffic of the proposed Enterprise Area.
- Its conclusion was that without radical measures to remove significant traffic movements from the city the road network would not cope if the AE was developed in any scenario

- The report acknowledged that the only tool in the Transport Strategy capable of abstracting the required number of traffic movements from the city was P&R. But the use of P&R would need to be massively ratcheted up for this to work. Twice as many drivers would need to choose P&R than do so today, but as previously stated, usage has not increased in 5 years at exiting sites. The report did not suggest how driver behaviour could be changed to this extent or suggest additional measures that would be needed to achieve this.
- CH2MHill simply used unsupported assumptions that existing P&Rs could be filled to 85% capacity rather than the 57% utilisation today, that Odd Down and Lansdown P&R would be expanded by 300 spaces each and that a new 1600 space P&R would be built to the east of the city
- CH2MHill was therefore a theoretical exercise rather than a realistic study of demand for P&R. Its purpose was to satisfy planners (or the planning inspector?) that the Enterprise Area could be delivered.

A freedom of information request has revealed that there was no written brief for the CH2MHill report, nor any version control, nor any minutes or actions from meetings in which it was discussed.

It is nevertheless the report that drives the need for 2200 extra P&R spaces and reveals the risk to the road network of building the Enterprise Area if driver behaviour cannot be radically changed so as to prevent them driving into the city.

The Placemaking Plan contains no method of creating such modal shift, save for a single reference that suggests the council plans to remove up to 1598 parking spaces from the city centre². This is not something that has been highlighted during the Placemaking Plan consultation documents or to members in approving the Placemaking Plan.

102. The Placemaking Plan provides for the retention of around 500 spaces within the Central Area which is considered necessary in order to maintain the vitality and viability of the city centre. (Volume B, page 28)

Please see section 10 of the BMA report to scrutiny for further information. Also the CH2MHill report and the council report of the 12th of November 2015.

4. Disregard of public opinion

Consultation on a P&R to the east of Bath is cited at 624 of the draft Placemaking Plan.

624. The Council has consulted with the public to help identify the most appropriate location (September/ October 2015). No final decision has been

² There are currently 2098 City Centre Car Parks within the ownership of the council

made on which is the preferred site. The general area under consideration is indicated on the Bath Spatial Strategy diagram for reference.

Please note that the consultation resulted in 49% being in favour of a P&R to the East of Bath and 51% against the proposal.

The council did not formulate a consultation plan to guide the consultation process, there was no assessment of how to consult or who to consult. The documents were highly selective and unsourced. The result was skewed by the fact that local MP Ben Howlett made an appeal on social media for people to support the proposal. This was targeted at Conservative supporters including those outside of the B&NES area.

A petition of 12,000 names against this proposal has been delivered to Downing Street but ignored by the council. These 12,000 signatures are split approximately one third central Bath postcodes, one third outer Bath postcode and one third beyond these locations.

More than 80 members of the public spoke against the proposal for an east of Bath P&R at the council meeting on the 12th November 2015 and more than 240 questions from the public were received, many of which had been asked during the consultation. Only 8% of those questions were ever answered, with the council refusing to answer the rest on the basis that the council 'does not regard the time and resources necessary to answer the outstanding questions justifiable or cost effective'.³ This despite the fact that the council's constitution upholds the right of citizens to ask such questions and have them answered. The Bathampton Alliance believes that the council could not have answered those questions without exposing the inadequacy of its process and evidence.

I thank you for taking the time to consider this submission and hope that it can be included with other representations on B&NES Placemaking Plan.

Yours sincerely

Christine Boyd and Andrew Lea

³ Letter to Sian James from Peter Dawson 8/12/15