

## **DRAFT RECOMMENDATIONS FOR CONSIDERATION BY SCRUTINY**

(Prepared by the Bathampton Meadows Alliance, based on contributions at the Scrutiny Inquiry Day)

### **1. RECOMMENDATION**

**Given the unacceptable environmental impact and the absence of evidence to show that the public benefit outweighs the harm, that the Scrutiny Panel RECOMMENDS that no P&R development proceeds (on sites A,B,F and H) on the Meadows.**

#### **Caroline Kay (BPT), Batheaston Parish Council and the BMA:**

- Reminded the Inquiry that this area is Green Belt, part of the City's UNESCO green garden setting and overlooked by the Cotswold AONB. It is in a bowl surrounded by 1,000s of residents and unlike other Bath P&Rs is simply impossible to screen.
- Emphasised a P&R on the Meadows would break the Council's own planning and placemaking policy tests, EU pollution limits and the Conservative manifesto promise.

#### **Professor Parkhurst, UWE:**

- Advised siting any large-scale P&R away from the city fringe (such as the Meadows) because they encourage people to stop using normal bus services and transfer to car usage, causing greater congestion and emissions.

#### **Bathampton Meadows Alliance, BMA:**

- Stated that the Bathampton Meadows Basin has been seeing increased car volumes and congestion since 2000 and increased emissions since 2010. As well as pollution remaining illegally high in various parts of central Bath, in Batheaston nitrogen dioxide levels have been at the EU limit and during Winter in the last two years have been over the limit. On this basis development would have to be refused at planning stage since the additional congestion and emissions generated by a P&R would push the area over the legal limit.

#### **FoBRA:**

- Stated that it had only supported a Meadows P&R site during consultation as this had been the only choice available.

#### **Batheaston Parish Council:**

- Over 12,000 people had signed the petition to save the Meadows. Of these one third had central Bath postcodes. The petition has now been delivered to Downing Street

### **2. RECOMMENDATION**

**Given the significant volume of new evidence it has received since the Full Council resolution of 12<sup>th</sup> November 2015, that the Scrutiny Panel RECOMMENDS:**

- **no large-scale East Park and Ride (EP&R) be developed as part of an Integrated Transport Solution;**
- **any car park(s) beyond the polluted Bathampton Meadows Basin should be smaller than that originally planned, served by public transport and be on brownfield site(s)**

#### **Afternoon Scrutiny Workshop:**

- Despite their differing viewpoints at the start of the day, having heard the evidence presented, not one table of participants recommended a P&R as part of its transport solution for the East. The 'link and ride'

from car parks served by public transport and on brownfield sites were preferred because they are more sustainable and carry less risk.

**Caroline Kay, Bath Preservation Trust (BPT) explained how EP&R:**

- was unconvincing based on the limited evidence available, and failed to show that the public benefit outweighs the harm;
- did not meet the requirements of the Council's own Placemaking Policy ST6;
- should be dropped therefore, since the case is not made, and the Council should pursue the more sustainable measures in its Transport Strategy that do no harm.

**Professor Parkhurst, UWE:**

- Demonstrated that the extra volume of additional, high-polluting buses on the road network would cancel out the limited reduction in congestion and emissions based on the small number of vehicles removed from the London Road
- Suggested that smaller car parks along existing public bus routes were a preferable solution for Bath. They would support the viability of the local bus network and prevent the many additional vehicle miles that would be driven to reach a large-scale P&R (on average a staggering 10km/intercepted car).

**Mott MacDonald:**

- Stated that the (£10m) project would only take 5% of congestion off the London Road in the morning peak, and 10% in the afternoon peak

**Bathampton Meadows Alliance (BMA):**

- Set out unequivocally (using the last year's council parking data) that **P&R usage was lowest (24%) when congestion was at its highest**. On this basis a new 1600 space P&R would only remove 384 cars from London Road during the morning peak - a poor outcome from a £10m investment. Investment should be targeted on measures that work better for this period of the day.

-- **On average during the last year % usage during a day's operation across the three existing P&Rs has been 38% (1059 spaces), leaving 62% (1718) unused**. These free spaces, available now, mean that B&NES has time to try the other (more sustainable) transport options first - before making irreversible decisions and wasting valuable scarce resources.

- Brought to Councillors' attention that Defra no longer supported P&R as part of an integrated transport solution.

They had been lukewarm in 2009 Guidance *"Park & Ride is unlikely to affect town centre traffic levels, and may simply add to the amount of traffic entering the town"*.

New 2016 Guidance removes **altogether** reference to P&R as a tool in its Policy Document.

B&NES should use the recent Defra guidance to update the Transport Strategy and adopt behaviour change programmes to get people permanently out of their cars before it is too late and money is wasted

- Questioned Mott MacDonald's work. The level and profile of P&R usage they presented was significantly different to that demonstrated from the data collected by the council through sensors at all existing P&R sites.

-- Questioned CH2MHill's work – via FOI they had uncovered that this report had no written brief or version control and yet was being held up as the very reason the project should progress. This work intimated that driver behaviour would have to change significantly to fill the P&Rs sufficiently but gave no plan as to how to do this. The Transport Strategy doesn't tackle this either.

- At no stage have Mott MacDonald's and CH2MHills' set out actual plans to drive the high levels of behaviour change that would be required of car users if their forecasts of P&R usage were to be realised?

**James Freeman, MD, First Bus, West of England:**

--Said that there was no demand for the 231 public bus service, but there would be for a 1,400 space P&R. In common with the Head of Transport for B&NES he did not refer to the substantial current and planned investment in Quality Bus Corridors and Quality Bus Partnerships elsewhere in the West of England, or suggest that Bath should seek similar investment.

**(Alliance note:** Bath's much cheaper P&R ticket structure vs public buses pushes those who have cars towards using them, generating more congestion in the process. This is clearly an easier model for the bus operator to run but risks isolating the most vulnerable without cars (30% in Bath), puts public bus services at risk and goes against the Council's Transport Strategy and full Council's 12<sup>th</sup> November resolution to support local buses.)

**3. RECOMMENDATION**

**That the Scrutiny Panel RECOMMENDS that there should be no risk taken with a costly £10m investment in East P&R when there is sufficient capacity elsewhere, usage would remain excessively low and reduced congestion and emissions on London Road would not be delivered.**

**Batheaston Parish Council, the Bath Preservation Trust, the Larkhall Cleaner Air Campaign, FoBRA and the BMA:**

- That public opinion supported a rapid solution to congestion and pollution as a key priority for the city
- This would not be achieved by investing in a P&R
- That despite such public opinion, council plans only intend to keep congestion (and therefore illegal pollution) at current levels due to the Enterprise Area development. What is more, the council's Air Quality Action Plan does not focus on the key step of reducing private car use. It is essential that investment is focussed on measures that do reduce congestion and pollution below current levels

**The Bath Preservation Trust and BMA:**

That no proper case had been made for a P&R to the East.

- Dashcam charts, such that B&NES Head of Transport displayed, showing people travelling into the city from all directions based on 2011 census data to employers no longer there (e.g. MoD on A36 at Bathampton) were not adequate evidence.
- Despite claims at Scrutiny from the Head of Transport that Mott had spoken to potential users to put into their latest model, we now know that these interviews were all around the edge of Bath in 2006 and 2014 with no questions asked about habits or behaviour change. **Potential users have yet to be spoken to about whether they would actually use a P&R East.**
- Usage levels remain low at existing sites and this is not because of expansion - they are simply not popular. Academic research (180 P&Rs across 40 studies) and B&NES' own surveys show that only around half of users ever intended to drive into town by car – every capacity figure quoted needs to be halved to show actual trips kept out of the City
- That there could be no acceptable justification made for a £10m investment, given the dearth of robust evidence so far

#### **4 . RECOMMENDATION**

**That the Scrutiny Panel RECOMMENDS that the more sustainable transport measures raised at its Inquiry and its Workshop (see below) be prioritised and programmed in an East of Bath Transport Plan. In many cases these have already been adopted in other cities and elsewhere in the West of England, and in some cases they are envisaged in the Bath Transport Strategy,**

-- Small scale, brownfield car parks linked to the public bus network (link&ride) in order to test demand;

-- Offer much better bus and rail services in order to meet the needs of more passengers, by collaborating with Wiltshire to negotiate, support and vigorously promote quality bus routes and partnerships and Metro West Rail services from Wiltshire towns, in conjunction with the Transport Operators.

These services would be quicker, more frequent, reliable and comfortable services, with keener prices supported by increased passenger numbers. Such developments would need to be accompanied by imaginative promotions and sustained measures to gain the support of commuters and communities in reducing car usage - and the congestion and pollution it brings to the city.

As we heard from speakers from Bristol and Nottingham, such measures would bring Bath, and its Wiltshire travel to work area, into line with the very heavy investment in such schemes elsewhere in the West of England and nationally. Such measures would also fit with the West of England Transport Study which is planning solutions to 2036: it is giving substantial emphasis elsewhere in the sub-region to further investment in public transport corridors to meet the needs of commuters and other travellers.

-- As described by a number of experienced speakers, promoting changes in the behaviour of car users requires a mix of carrot and stick measures supported by strong and sustained communications and investment. We heard that such reinforcement can be achieved by:

- Properly researching what would convert more families to abandon the school-run by car for more sustainable, more healthy and less polluting options, in order to reduce the sharp increase in congestion and pollution levels during term time. And then designing and investing time in a programme to promote and support reduced use of the car.
- Properly programmed and resourced encouragement, advice and support in work-based and school travel planning - to spur active travel: public transport, walking and cycling;
- Continuing the readily accessed travel information systems;
- Sustaining a campaign to draw far more attention to severe, unlawful car pollution (and congestion) levels around Bath, accompanied by clear messages about their impact on health, health-care costs and EU fines - and what individuals can do;
- Supporting and encouraging low carbon transport, and city car clubs;
- Growing far more vigorously the freight consolidation service
- Continuing to restrict and to charge heavily for city centre parking;
- Introducing access controls and/or charging on the most polluting vehicles;
- Carefully planning for a public conversation about harder measures – congestion charging, workplace parking levy and widening of residents' parking zones - given the increasingly severe impacts on city life, clearly described by FOBRA.

**Bathampton Meadows Alliance, April 2016**