Meeting with Ashley Ayre
12th October 2016 on the proposed East Park and Ride

Agenda

1. Introductions
2. Why do we care about this project?
3. The picture of P&R in Bath today
4. The Meadows – definition, importance and protections
5. Why are we concerned with air quality?
6. What should the Council prioritise?

2. Why do we care about this project?

- Consultation issues and objectives struck a cord with us – we would all like less impact from traffic and very few of us can see the proposed sites from our homes!
- But we could not find the 'robust evidence' promised in consultation to support a solution that had such a damaging impact on the landscape. To be offered only choices on the Green Belt in the World Heritage Site Setting was hugely disappointing
- In particular there wasn't (and still isn't) a clear picture of the target user nor how these journey types fit into the wider reasons for travel
- Since consultation, we have learned from academics that P&R does not solve the problems it is designed to address and has many unintended consequences – P&R increases journey length and creates new trips - only 50% of drivers using P&R would have driven into the city if it were not there.
- Our own research showed an average daily fill of only 41% at Bath's existing P&R - consultants for the Council now broadly agree with our analysis of this full year Council data
- The Council's own consultants now state that an East P&R will not improve congestion or emissions in the centre and will have little impact on the London Road.
- Moreover, Defra no longer support P&R as a means of reducing congestion and hence pollution
- The Council overstated forecasts when it predicted the need for expansion under the Bath Package. Rather than an increase, P&R demand has fallen by 125 spaces since 2009 resulting in a surplus of 1022 P&R spaces. The case for an East P&R is based on WebTAG – the same theoretical forecasts and the modelling tool used in 2009.
- We aren't alone – HE, NT, BPT and CPRE have all spoken out against Meadows development

2.1 Of the consultation reasons for promoting P&R, only two are potentially supportable today

Issues to be Addressed

As the above development opportunities are implemented, it is important that we also address a number of transport related issues, including:

- 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

Objectives for a Park and Ride Scheme

The proposed Park and Ride scheme has been considered in the context of the wider strategy to address the problems indicated above. While a Park and Ride would, at least initially, be bus-based, the scope to include rail services has been considered. In addition, the Park and Ride proposals have been considered against a set of objectives:

- 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

It is important that any proposal is considered against these objectives to ensure that the solutions address the problems based on robust evidence.

Source: panels used at Public Consultation events from B&NES website

2.2 Defra guidance no longer supports P&R as a tool to reduce congestion and pollution

- 2009 Guidance was already lukewarm towards P & R:
  - *"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 reference to P & R as a tool altogether** from its Policy Document
- Instead emphasis is given to:

Access Controls on most polluting vehicles – Clean Air Zones & Variable Charging Schemes

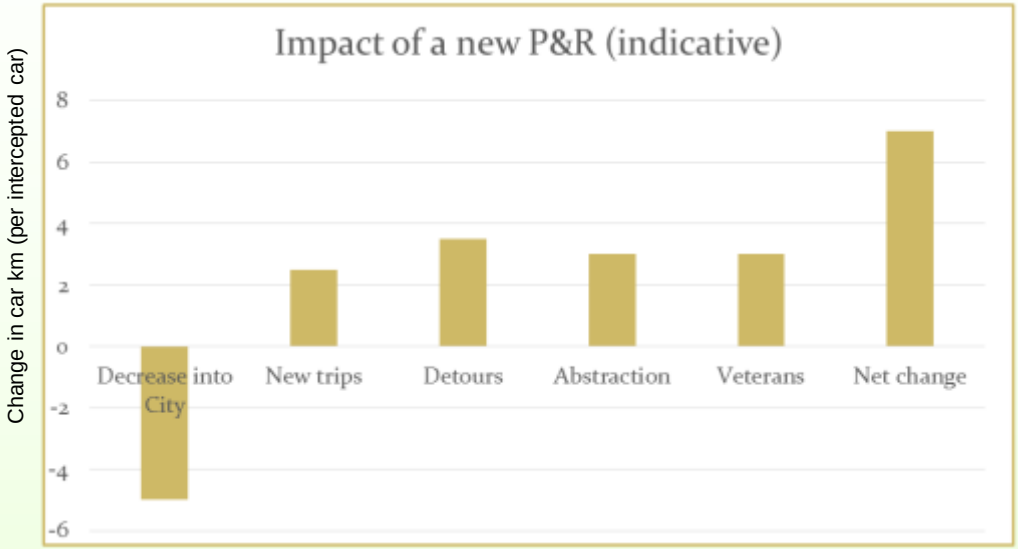
Traffic Schemes: Speed limit restrictions, Intelligent Traffic Management, SCOOT, Improving Traffic Flows through e.g. Junction design

Promoting Low Emission Transport: Green Bus Technology Fund, OLEV schemes

Promoting Behaviour Change – School & Workplace Travel Plans, Travel Awareness Campaigns

Smarter Choices Campaigns to encourage modal shift to more sustainable modes of transport

2.3 Academic research into P&R helps explain why Defra has made this shift



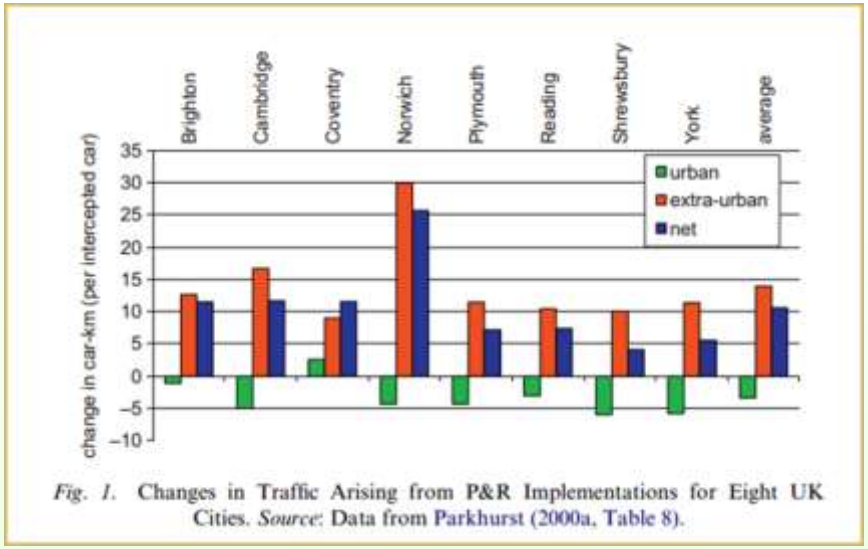


Fig. 1. Changes in Traffic Arising from P&R Implementations for Eight UK Cities. *Source*: Data from Parkhurst (2000a, Table 8).

"City fringe type facilities lead to an increase in Vehicle Km Travelled. The results range from about 1 to 4 additional kilometres per P+R user"

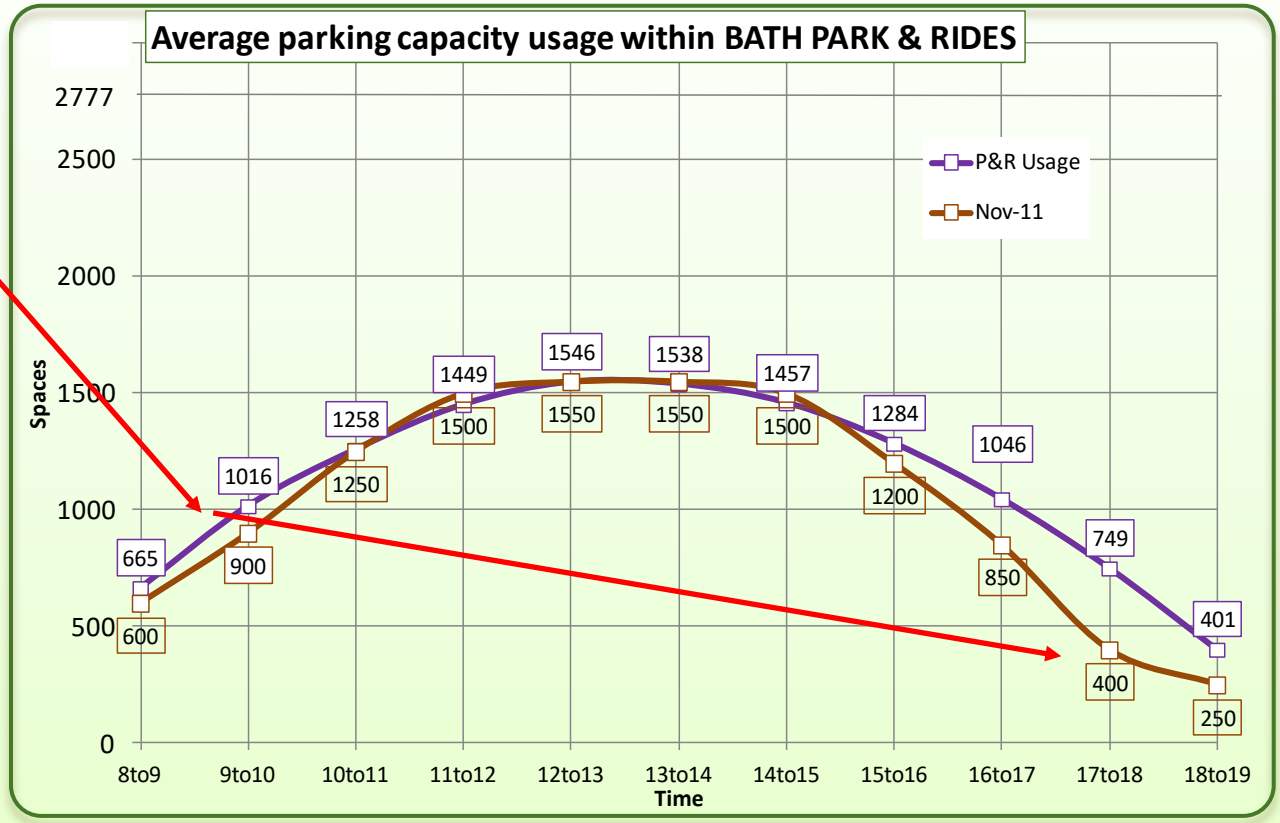
"Fewer than one out of every two P&R users (i.e. fewer than 50%) is a *target group* user who would have otherwise driven into the city"*

Park and rides do not solve the traffic issues they are meant to – instead they generate more traffic. Prof Parkhurst has focused on capturing people closer to home and/or the concept of link and ride – smaller car parks on public bus routes. In semi-rural and rural communities to the East, public buses are the most equitable.

*Source: Zijlstra, Vanouttrive and Verhetsel 2015 – a meta-analysis covering 40 studies across 180 P&R in Europe

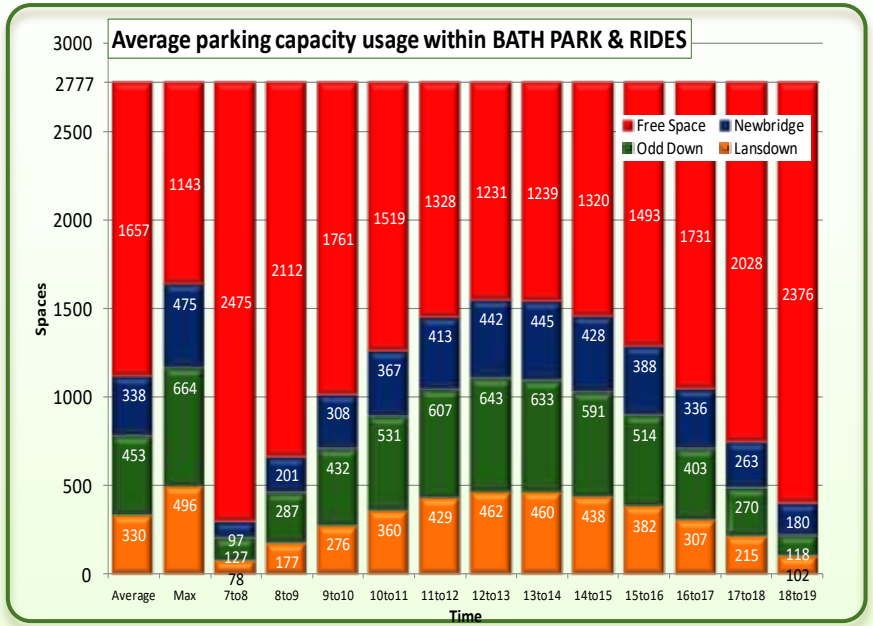
3. P&R usage has followed the same daily filling and emptying pattern since November 2011

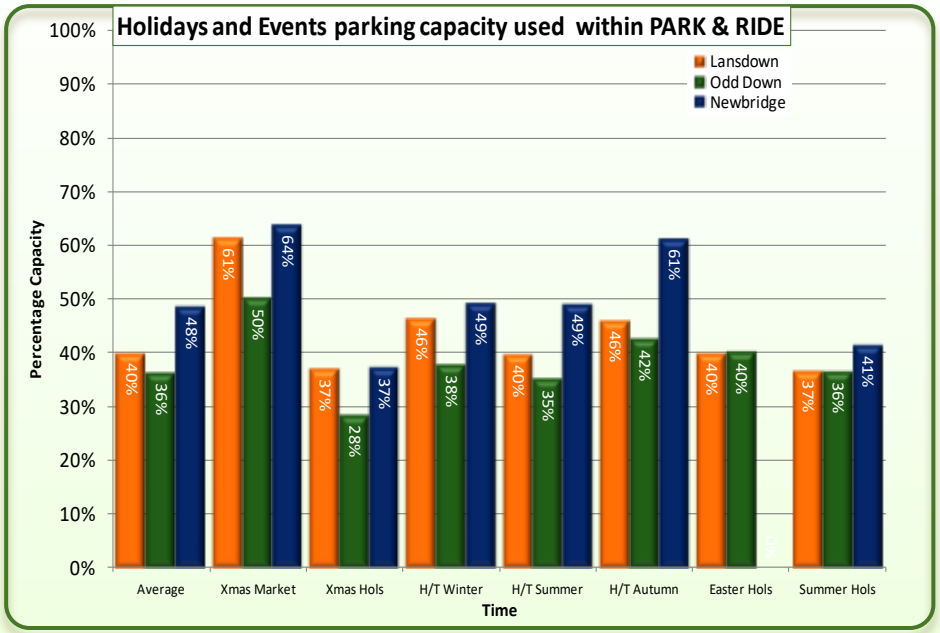
- When congestion is at its highest in Bath, the three existing P&R are used the least by drivers
- This trend has been consistent over time. And when compared with the Bath Transport Strategy usage levels from 2011, the latest BANES parking data is virtually the same in behaviour and actual usage levels during the day.



Source: Banes Parking Data 01/03/2015 to 29/02/2016 and GAB Transport Strategy 2014 for the Nov 11 data

3.1 On average, Bath's P&R are only 41% full and only see capacity stretched due to known seasonal events





- The above chart provides a more detailed picture of Park and Ride usage during the day. The trend is similar by location.
- In addition average usage shows that 1,657 spaces are unused each day and maximum average 1,143 spaces unused

Source: Banes Parking Data 01/03/2015 to 29/02/2016

Average*– the average capacity level achieved over a given period

Max**– the maximum capacity reached each day averaged over a given period

- The are wide variations in usage levels as a result of specific events. The Xmas market and December period are the busiest period
- Between 1st March 2015 and 29th February 2016 capacity levels reached 100% on 21 days at one or more Park and Rides at some point in that day.
- There are 19 days when average Park and Ride capacity exceeded 80%. Of these 17 were as a result of the Xmas Market.

3.2 Use has declined since Bath Package expansions approved

	Expansion completed	Pre/post expansion capacity	Pre expansion maximum	Post expansion maximum	Net Change
Odd Down	Nov 2012	1022-1252	850 (83%)	664 (53%)	(186)
Lansdown	Feb 2013	437 - 837	437 (100%)	494 (59%)	57
Newbridge	August 2015	450 -698	450 (100%o	454 (65%)	4
Combined		1909 - 2787	1737	1612	(125)

- *In 2009, projected demand led to planning approval for expansion of all three P&R sites*
- *Odd Down was expanded from 1022 spaces to 1252, but today only an average of 664 spaces are used. RUH bus provision has not prevented this decline. This offsets the modest increase at Newbridge and Lansdown. Today there are 125 fewer spaces used overall than in 2009*
- *There is now an excess of 1022 spaces at the busiest time of day and according to the latest CH2M report this is enough to absorb the increase in demand from the planned development that has consent.*
- *CH2M suggests that if there is a need for P&R at all to the East, a maximum of 400-500 spaces would be required by 2029*

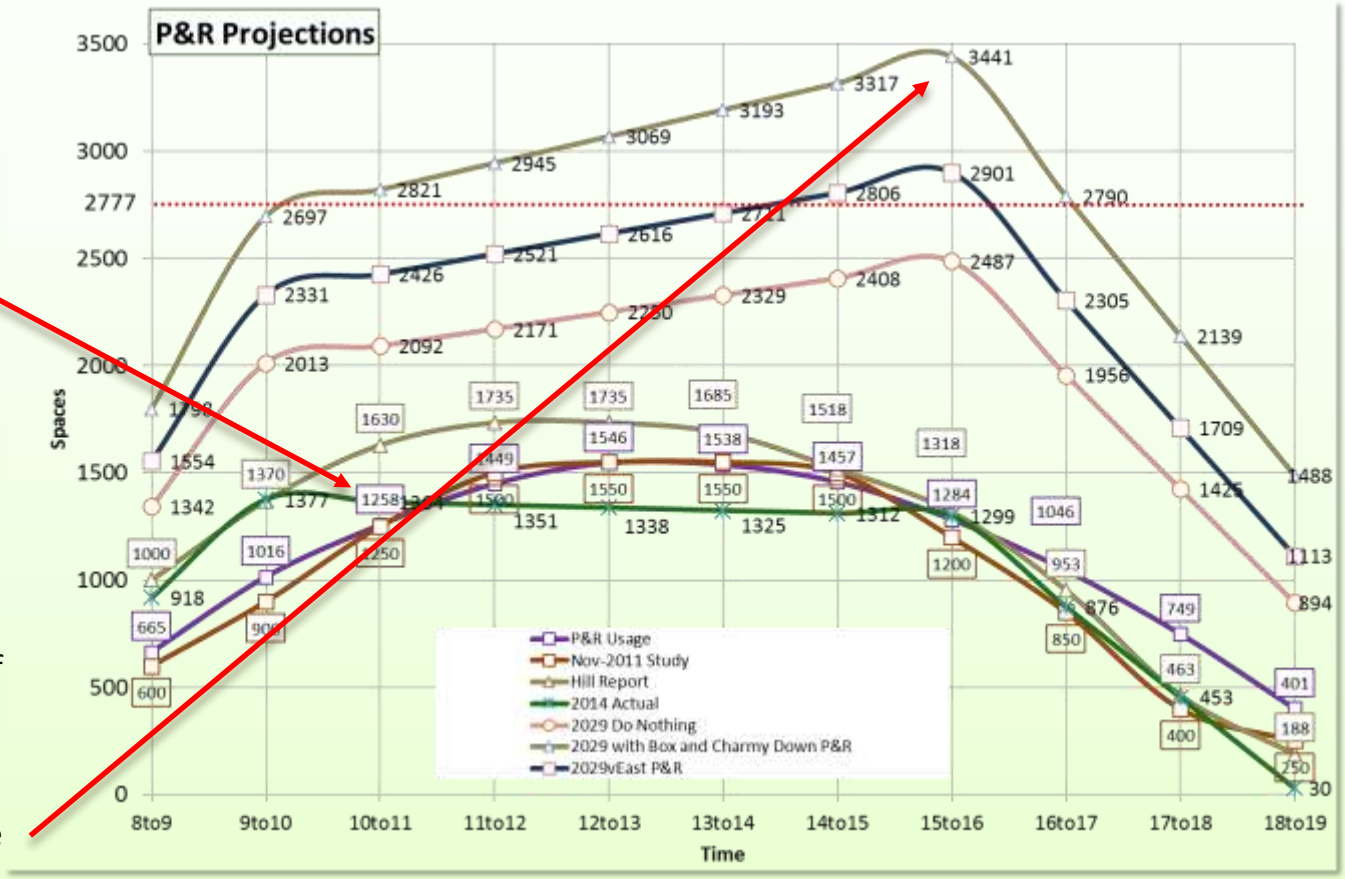
3.3 We believe that the most recent Mott McDonald forecasts, presented at Scrutiny, should be viewed with caution because they project unrealistic driver behaviour

1. Mott start with a flatter profile of today's usage, which is different to the Transport Strategy that they themselves had produced (green line called '2014 actual')

2. They then create a completely different profile of usage to Bath Hacked, the GABTS Nov 2011 data and the CH2MHill report (see the top three lines on this chart named 2029)

3. Their forecasts show an East of Bath P&R filling steeply until 3pm

4. Who are these people who are arriving to park at 3pm? This user doesn't exist today, nor did they in 2011



5. With the exception of Southgate Rail, all city centre car parks follow the same usage as P&R – empty at the start and end of the day, with a peak around lunchtime. If these car users started to park in a P&R, they would not create the forecast that Mott have above. This simply doesn't reflect actual human behaviour in and around our city.

4. The Meadows – definition and importance

- Bathampton Meadows, which include sites A, B & F, are one of Bath's oldest and most loved unspoilt landscapes. Site B was indeed 'Meadows Farm' until the current owners changed the name to New leaf Farm.
- They are mentioned in Britain's earliest public record, the Domesday Book and land has been grazed since the Bronze Age.
- The meadows comprise a large part of the *"fingers of green countryside which stretch right into the city"* – one of the attributes which convey the Outstanding Universal Value of the World Heritage Site
- The Site Setting Supplementary Planning Document 2013 (SSSPD) identifies only 3 views from the open countryside into the City. Two of these (Grade II listed Brown's Folly and the Scheduled Ancient Monument of Little Solsbury Hill), would be despoiled by development on the Meadows.
- Unlike the existing P & R sites, meadows are highly visible, including from the national Trust owned Scheduled Ancient Monument of Little Solsbury Hill, and the National Trust Sites of Brown's Folly and Bathampton Downs. It would not be possible to screen the development from these views. The walk across Bathampton Downs is the most downloaded walk from the National Trust website in the whole of the UK.

4.1 The Meadows – protections

- One of the core principles of the NPPF 2012 is:

"*to conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations*."

- Para132 of the NPPF notes that:

"Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting…."

- And that:

"Substantial harm to or loss of designated heritage assets of the highest significance notably…World Heritage Sites, ***should be wholly exceptional.****"*

- Bathampton Meadows are: in the World Heritage Setting of Bath (Site A is within the Site itself); in Bath's Green Belt; in the setting of the Cotswold Area of Outstanding Natural Beauty; in the setting of a Scheduled Ancient Monument, and two significant National Trust properties; in the valley between and overlooked by the conservation areas of Bathampton & Batheaston.
- Each of these planning designations are protected by statute, national and local planning policy, and by case law. The thresholds for overcoming a presumption against development of a site with these designations are deliberately set high – and all tests must be independently satisfied.

5. Beyond the WHS setting issue, both traffic and pollution in the Meadows basin is increasing with consequences for public health

Traffic and Nitrogen Dioxide Changes to the East of Bath 2010-2014

Note: although declining, London Road pollution levels remain illegal

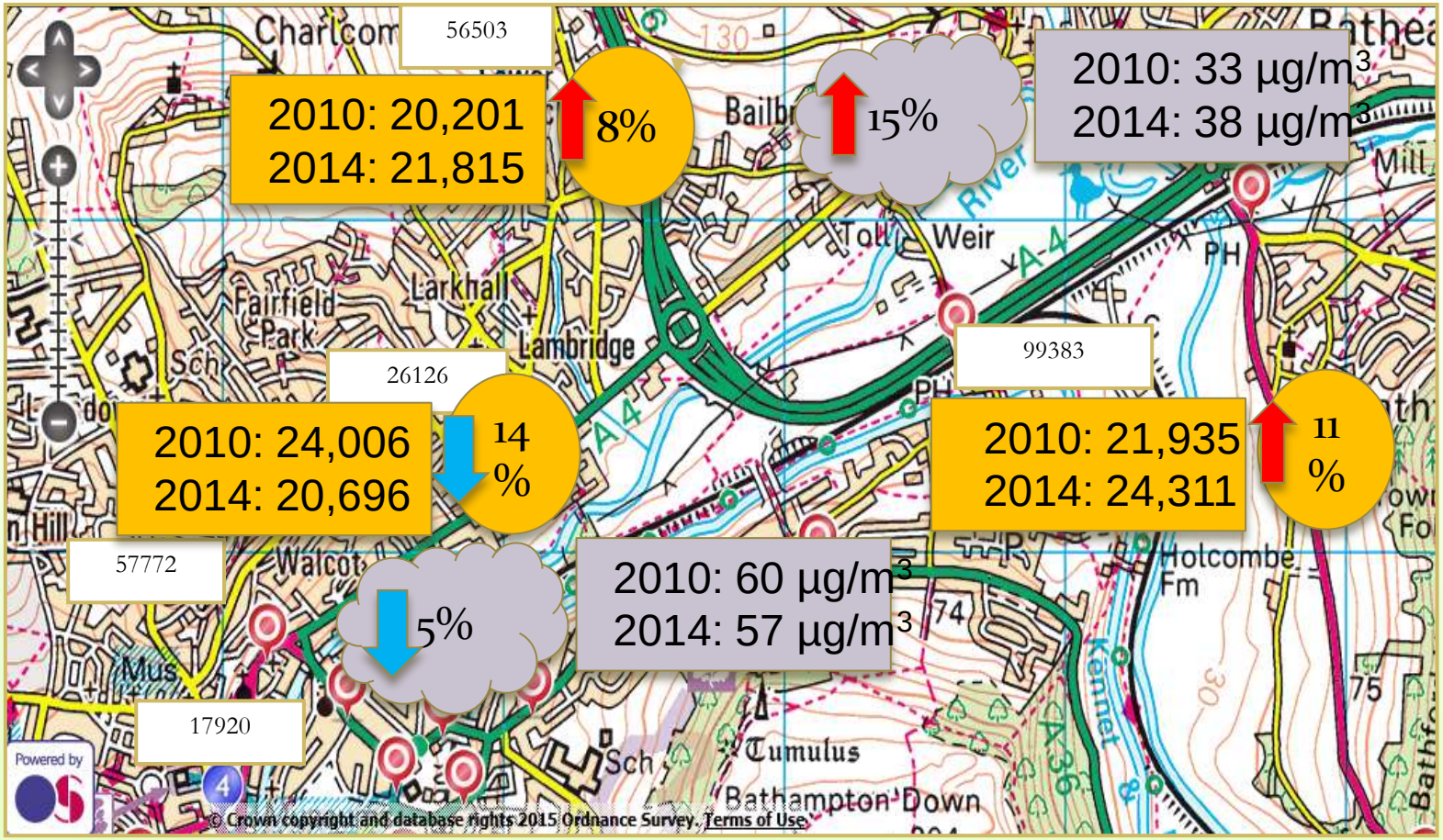
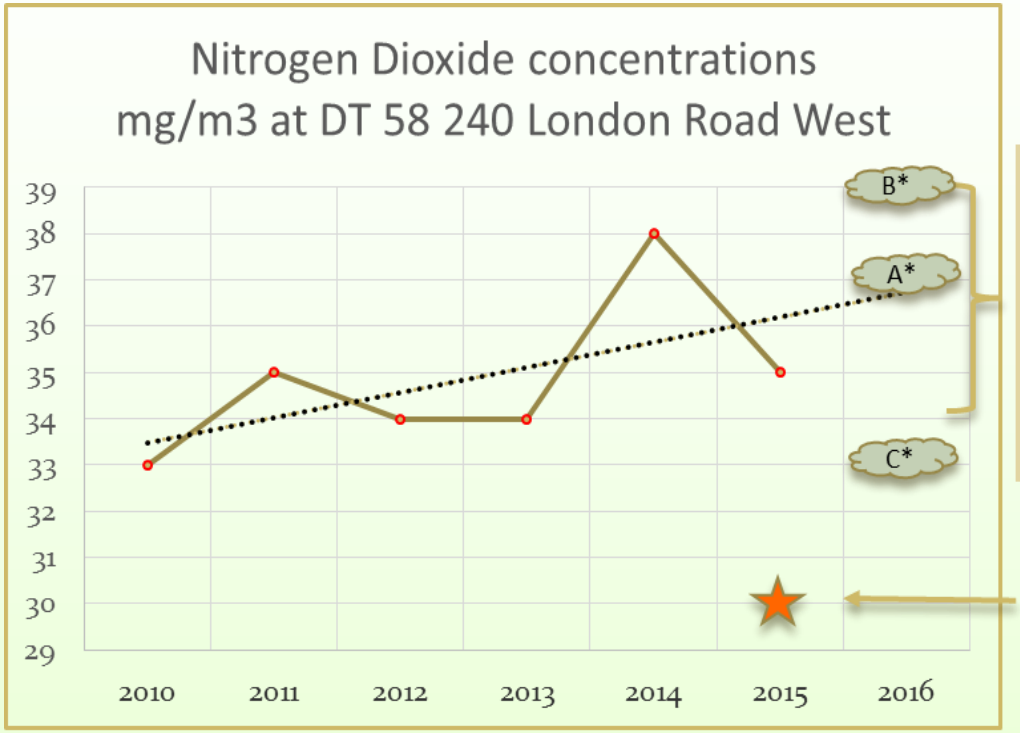


Chart Source: Dept for Trans Annual Average Daily Flows (AADFs) & Banes Air Quality Monitoring 2015 Screening Assessment

5.1 Nitrogen Dioxide levels continue to rise in Batheaston



Local Bias applied since 2010 in published results (note: 2012 National and Local Bias Factors the same)

The drop in 2015 can be accounted for by a local main road, the A36 being shut for 4 months. Toll Bridge traffic down by 40% as traffic diverts via Sally in the Woods/Winsley. The drop in levels is seen clearly in month-on month pollution readings. If you exclude these months (March-June), both 2014 and 2015 have the same average (pre bias) base levels for the remaining 8 months

Revised 2015 reading with National Bias applied

* For comparison purposes, provisional average monthly readings (6/1/16 – 26/5/16) at new tube DT 94 Batheaston - 158a London Rd West. 'A' shows average base unadjusted reading of 37.1, 'B' 39.3 with 2015 Local Bias applied, while 'C' at 33.4 applies the National Bias from June 2016.

5.2 Public health matters – there are concerns that the WebTAG approach doesn't take this aspect into account

"Transport for London: We feel WebTAG undervalues the price of CO2 and air pollution, particularly the cost of damage caused by NOx emissions. This makes it harder to justify spending in pure cost benefit ratio terms, especially when considered against values placed on journey time. There is also no quantification of other environmental costs and benefits such as adaptation to climate change. We appreciate that DfT depends upon other departments to make alterations to these values. A joined-up strategy between Government departments would help to resolve this..

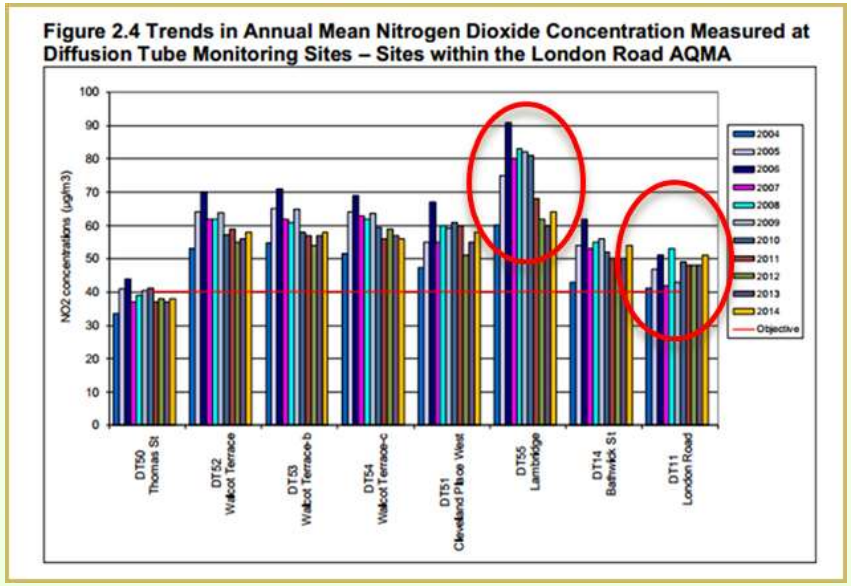
Bristol City Council echoed these concerns, noting that: any scheme which increases journey times for motor traffic performs very badly against WebTAG criteria regardless of its wider benefits and modal shift through highways capacity constraints cannot be factored in."

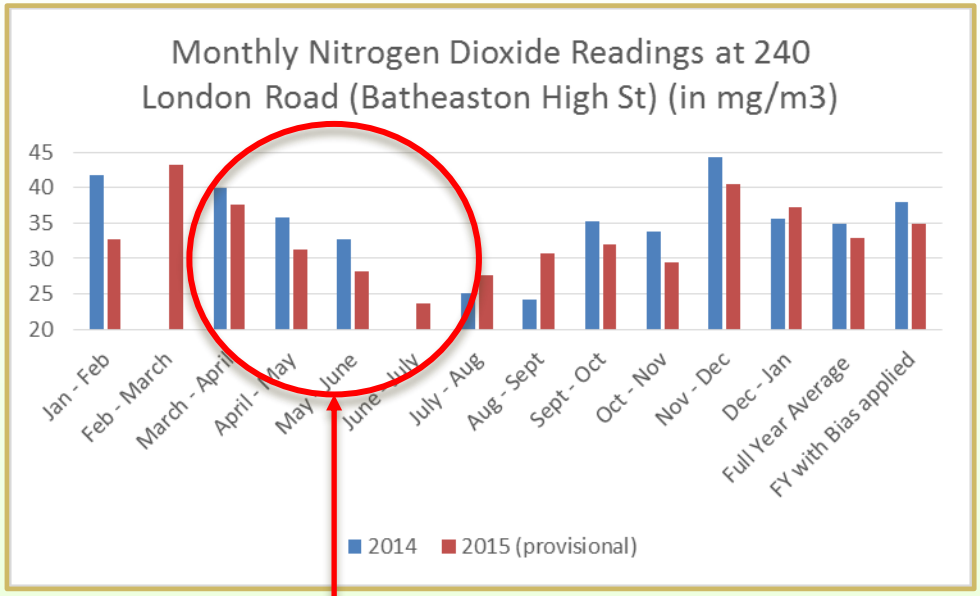
Environmental Audit committee chaired by Mary Creagh MP, published Sept 16, into Sustainability in the Department of Transport

Please note, beyond the concerns raised above by Council peers around WebTAG in this context, it is our understanding that the first part of any WebTAG assessment should an options appraisal that identifies a particular intervention as the most appropriate solution. We have asked to see this document, but believe that it has not been undertaken.

Because P&R in Bath has been shown not to work with drivers in reality, especially at peak times, a more effective plan must be developed that will actually permanently reduce traffic.

5.3 There is evidence from Bath itself that getting traffic moving and enforced changes make a difference to emissions





At the Lambridge end of the London Road where traffic crawls the most and there is a set of lights, readings are significantly higher

When the A36 shut for 4 months in 2015 (March – June inclusive), average nitrogen dioxide levels in Batheaston were just 32 vs 39.5 in 2014. Toll bridge traffic fell by 40%. For the full year excluding these months and any bias, the readings were the same at 34 mg/m3 so underlying pollution remained the same.*

*Source: Banes Air Quality Monitoring 2015 Screening Assessment and 2015 provisional results

6. What should the Council prioritise?

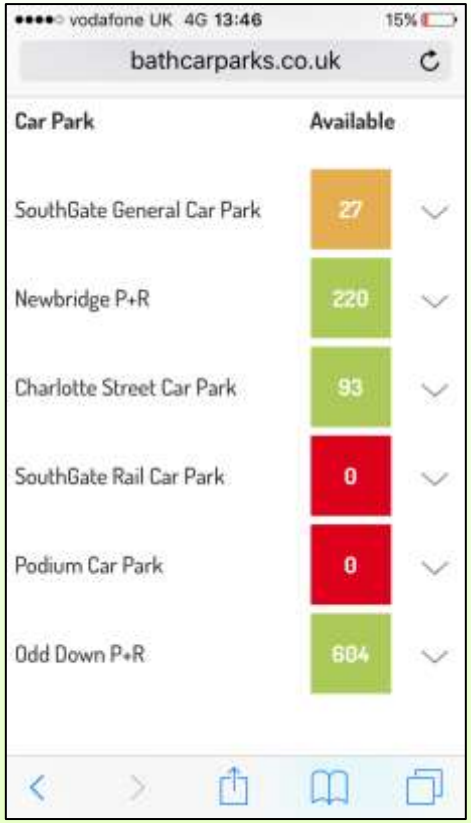
From our research, we believe these to be priorities:

- Improve access and signage to existing P&R
- Provide overspill car parking for known seasonal events, especially the Christmas market
- Seize opportunities to increase bus use such as bus franchising and Quality Bus Corridors
- Conduct research to really understand the problem of congestion and pollution in Bath and then identify measures that can make a difference
- Acknowledge that to deliver the reduction in congestion that the transport strategy aspires to and that legal obligations around air quality require, harder measures may be needed in order to change driver behaviour
- Look again at what other cities have done – London, Copenhagen and Hasselt for example

Our own initial research shows that;

- Peak morning traffic in Batheaston drops by 30% during School holidays
- Pricing forces less sustainable travel choices and puts public transport at risk
  - It is cheaper to use a P&R than a public bus, you even pay more for getting on the same P&R route closer to town if you haven't driven out to the P&R
  - It is significantly cheaper to park in a town car park than to take the public bus as a family
  - It is usually possible to find a cost-free short stay space on a street in the centre, so why use P&R when you can take a risk and drive to your destination?

Sunday October 2nd 2016 in Bath – drivers queueing & circling to park while the P&R had plenty of spaces - the Council must make existing P&R work before building more to the east.



'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.'

Source; Transport Evidence Explanatory Note CD/PMP/B27; Bath: Park and Ride Expansion, CH2M April 2016