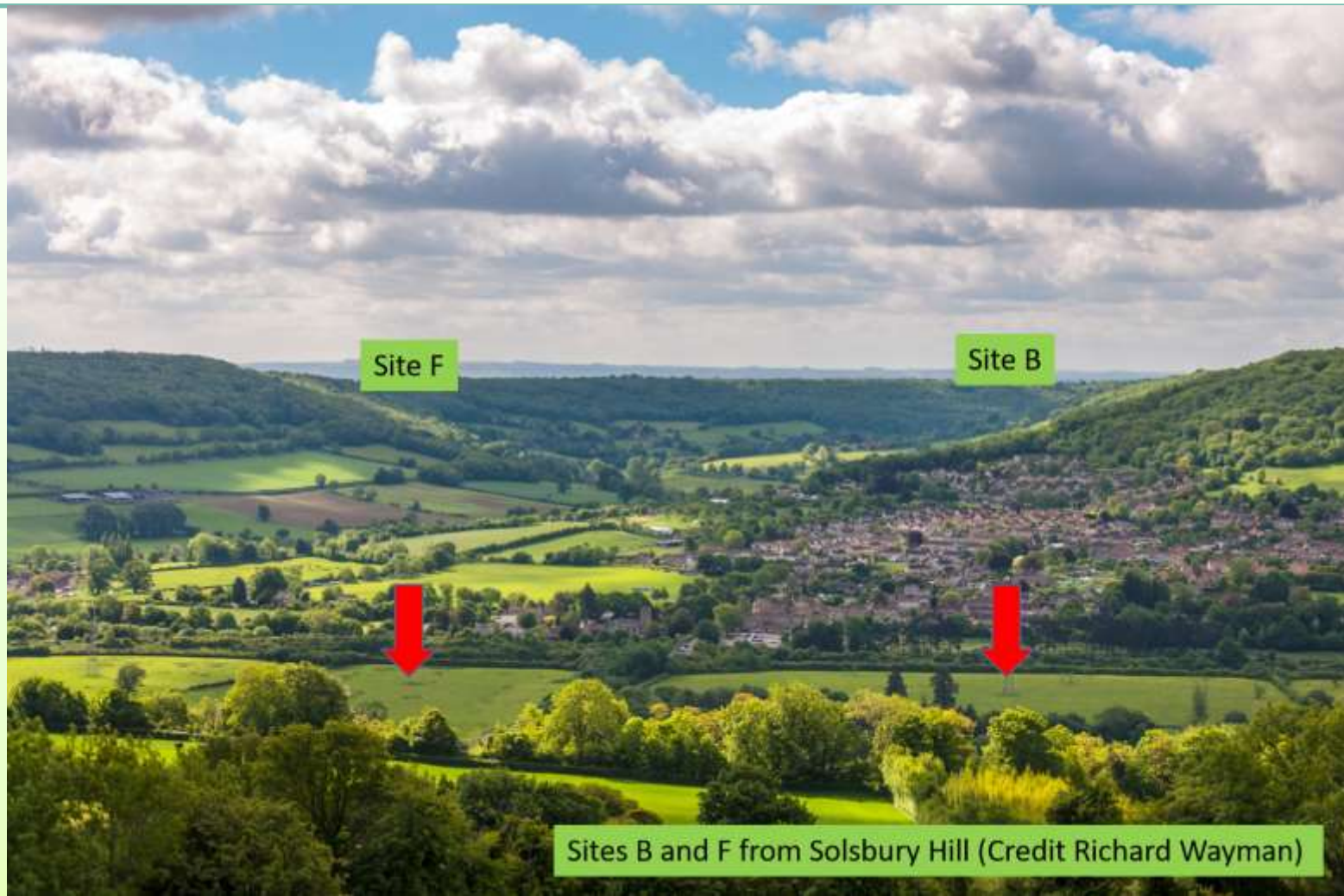


Proposed Park and Ride on Bathampton Meadows

Campaign messages and wider issues raised, April 2017



Sites B and F from Solsbury Hill (Credit Richard Wayman)

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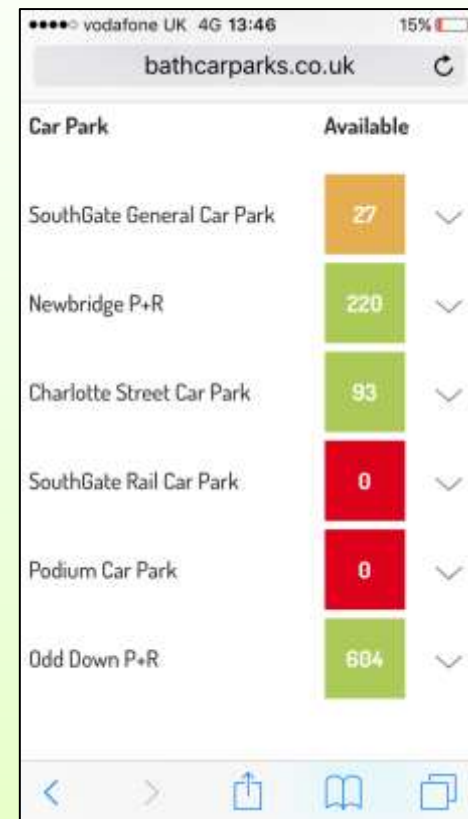
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1. Why do we care about this project?

- 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! (see slide 12)
- 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. There has been no evaluation of existing P&R or of the broad value of the Meadows
- 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. Instead user data and reasoning of a very low quality is used to justify the scheme
- 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 and usage lowest at peak travel times - 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. Tim Warren also says there are no plans to tackle private car use.
- The Council isn’t being properly analytical or learning – it 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. We had to point this out. The case for an East P&R is based on the same WebTAG theoretical forecasts and the modelling tool. Critics say WebTAG undervalues air pollution in its model
- Moreover, Defra no longer support P&R as a means of reducing congestion and hence pollution
- We aren’t alone – HE, NT, BPT and CPRE have all spoken out against Meadows development – it is protected land!
- The project is now considered a ‘contentious issue’ by the Council and they are refusing to comment on any aspect of it during purdah. This is despite them voting in January 2017 to take a site decision in 4 weeks. As we have exposed via FOI that the site they all voted for isn’t deliverable, they are now hiding from revealing it will need to be the site they have often said should be protected. They are unwilling to accept that it is a flawed project.

Solving Bath's transport issues should be about firstly understanding behaviours then behaviour change, but this features nowhere!

Sunday October 2nd 2016 in Bath – drivers queueing & circling to park while the P&R had plenty of spaces



Car Park	Available
SouthGate General Car Park	27
Newbridge P+R	220
Charlotte Street Car Park	93
SouthGate Rail Car Park	0
Podium Car Park	0
Odd Down P+R	604

‘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

2. Council's shifting position in response to the campaign

2015

'immediate benefit' to congestion and pollution

£5.5 m

2016

'target user is a commuter'

(Campaigners)
'P&R are underused, especially at peak times'

'its for the future' (no behaviour change plan produced)

'Odd Down is overspill parking' (not true!)

£10m

2017

'no noticeable impact on air pollution'

'part of a jigsaw of a solution' (no other pieces presented)

'P&R has grown by 16% since 2009' – shift from cars off road to skewed bus passenger data

£17.5m and
£115k/
annum
loss

Detail behind slide 4...

2015

- **August:** Council holds public consultation for P&R - issues to be addressed set out as environmental ones such as congestion and pollution. 51% of those responding to the consultation say they do not want one.
- **November:** Full Council meeting paper says the would be 'immediate benefit' to congestion and pollution from scheme

- **Cost of P&R construction estimated at £5.5m in council papers**

2016

- **January:** Tim Warren responds to written question to say that the target user of the new P&R is the commuter
- **February:** Campaigner Andrew Lea crunches council data and shows P&R are severely underused except for at Christmas Market time/occasional known events and are emptiest when congestion is worst (e.g. not used by commuters).
- **February onwards:** Council falls silent on potential target user and doesn't restate consultation issues to be addressed.
- **April:** Council consultants CH2M agree with Andrew's data in their own report
- **September:** Council publishes papers for Placemaking Policy hearings setting out that P&R will make almost no impact on congestion and network capacity will increase to 98%. It starts to say the scheme is to alleviate 'future' congestion instead of current with no detail behind why it is the right solution for the future if it isn't well-used today
- **October:** Campaigner Christine Boyd establishes that P&R usage has gone backwards since 2009 planning permission to extend existing sites. The last time they predicted 'the future', they got it plain wrong and are using the same approach again. Council doesn't dispute figures

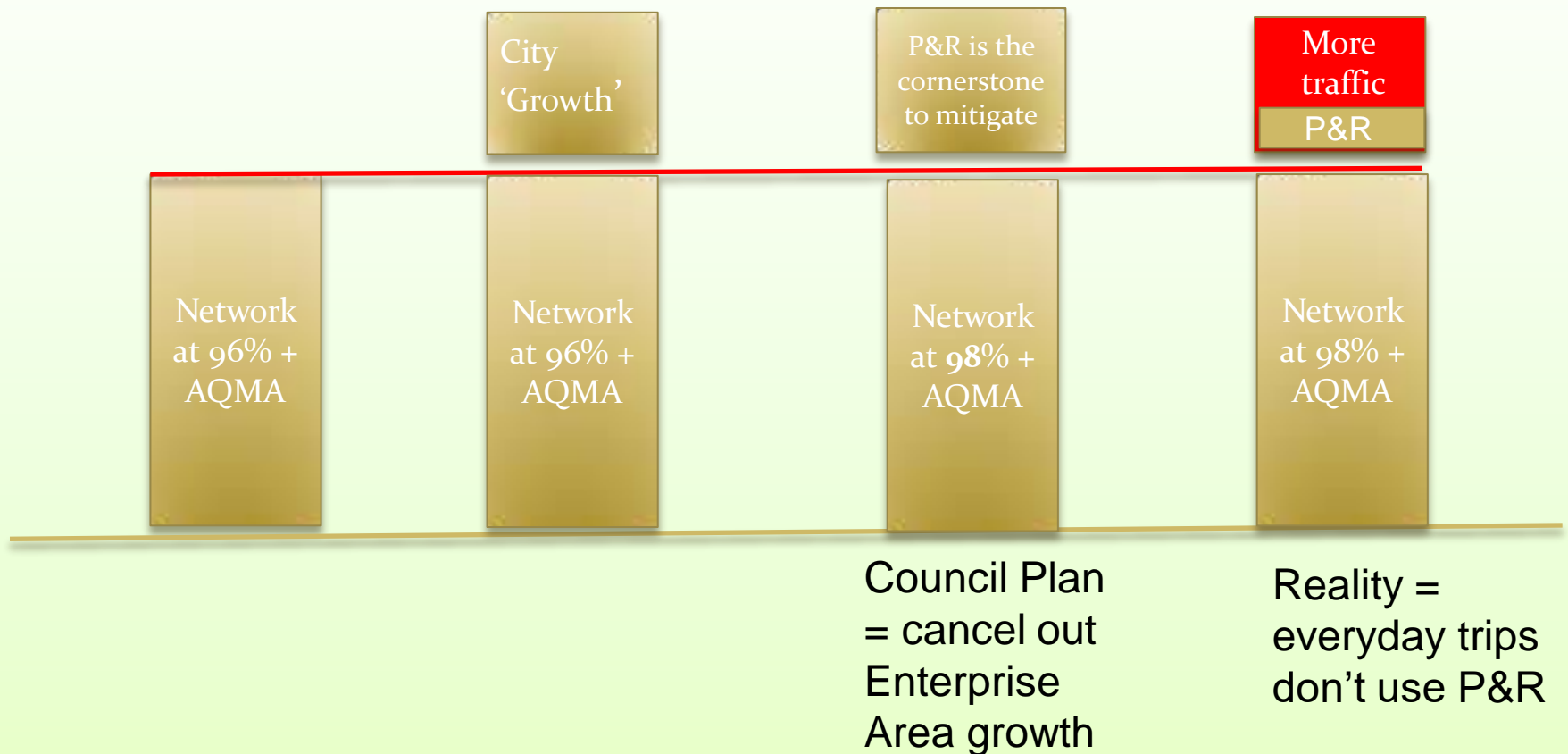
- **Cost of project escalates to £10m**

2017

- **January:** Council Q&A for Cabinet paper says there will be no noticeable impact on air pollution from the scheme
- Council starts to say that the P&R is part of a 'jigsaw' of a solution, but does not put any other pieces of the jigsaw on the table or set out how a full plan is deliverable, affordable or appropriate
- Council shifts to using misleading bus passenger figures to justify supposed park and ride success. These figures include passengers getting on the buses at public bus stops on the route and the huge Christmas market spike. Used in Chronicle and council magazine.
- Council also starts to say that scheme will offset forecast increase of 23,000 people travelling by car to Bath by 2029. No plans put forward to deal with other 22,200 trips not catered for by a P&R or existing congestion.
- Council starts to quote older consultant reports, which are more favourable to their cause.

- **Cost of project escalates to £17.5m with heavy caveats it may change again. Preferred site forecast to make a loss of £115k/annum**

2 cont. The current plan therefore is to make congestion and emissions worse..



3. Which wider issues does this raise?

- The need for evidence-based policy-making – is this a capability issue or a political issue?
- How to hold Councils to account? The ability for concerned residents to have their complaint heard by a qualified neutral decision-taker before it reaches a costly judicial review
- Air Quality Action Planning – how to ensure politics doesn't get in the way of public health
- Park and Ride – how to open up the debate that they generate congestion rather than solving it – why is Defra being ignored locally?



4. P&R campaign background

4.1 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**

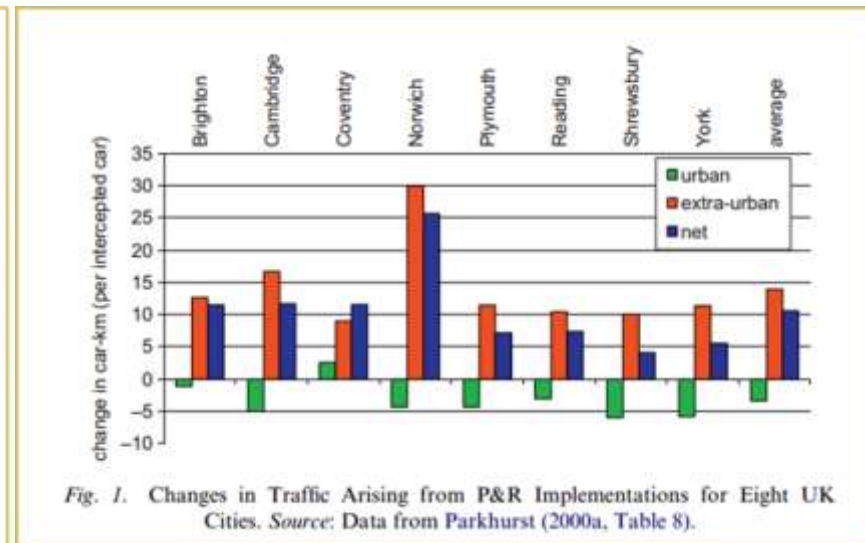
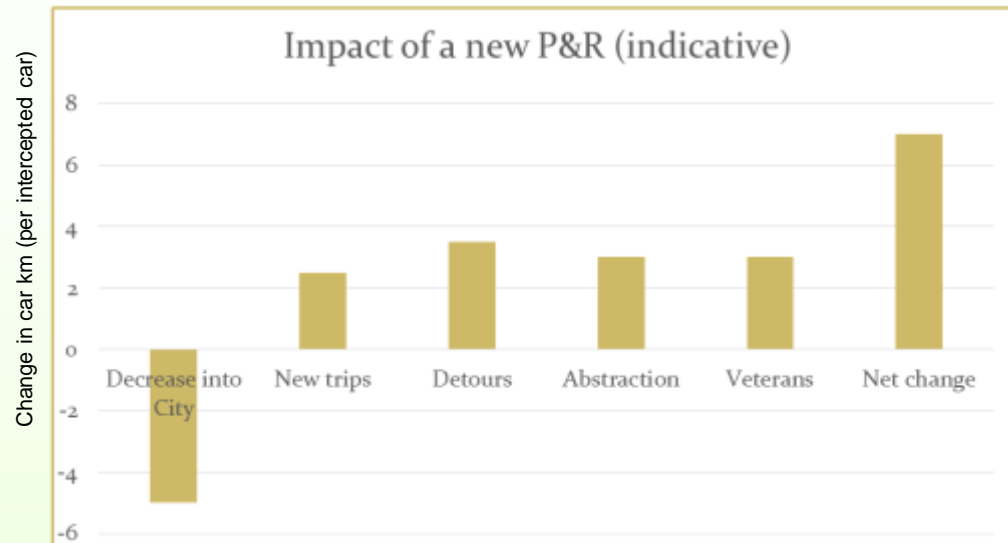
**Traffic Schemes: Speed limit
restrictions, Intelligent Traffic
Management, SCOOT, Improving
Traffic Flows through e.g.
Junction design**

**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**

4.1 cont. Academic research into P&R helps explain why Defra has made this shift



“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.

4.2 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

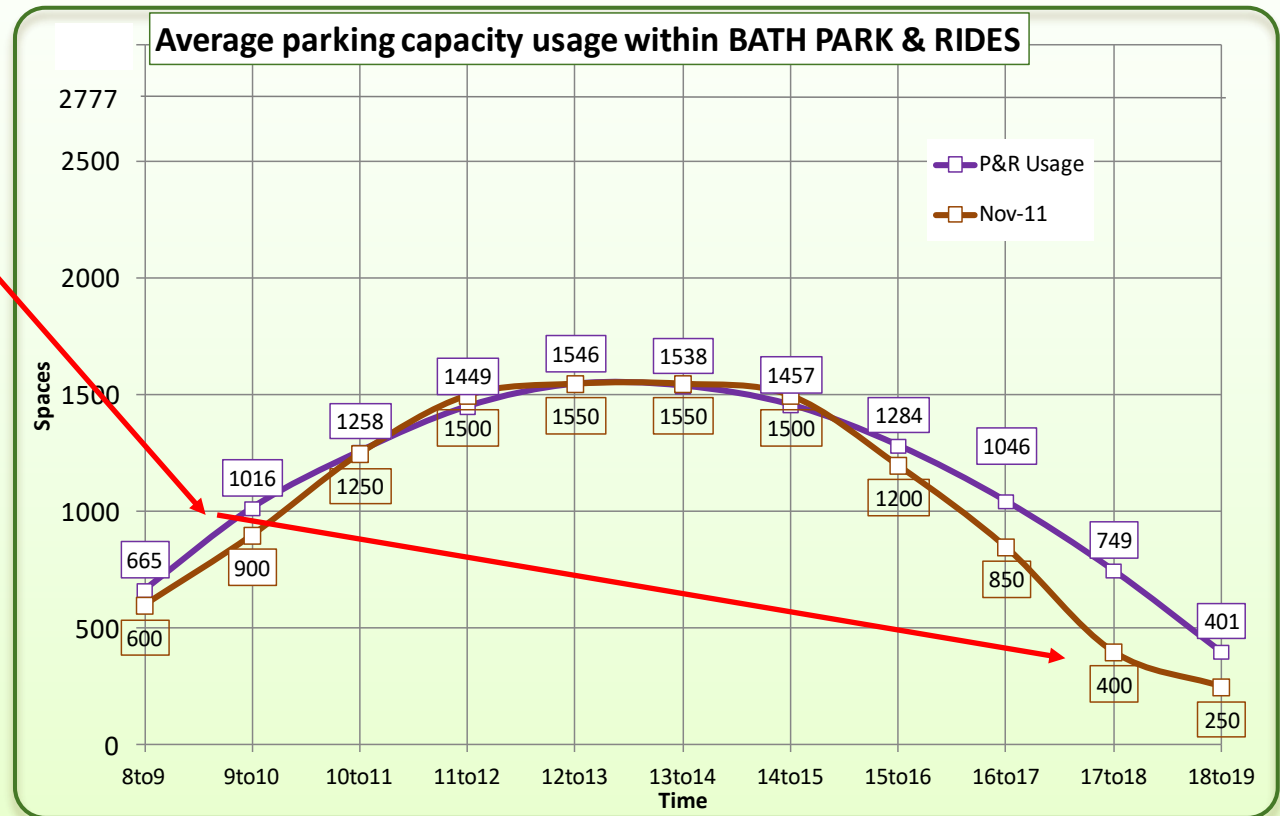
The proposed Park and Ride scheme has been considered in the context of the wider strategy to address the problems indicated above. While a Park and Ride would, at least initially, be bus-based, the scope to include rail services has been considered. In addition, the Park and Ride proposals have been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

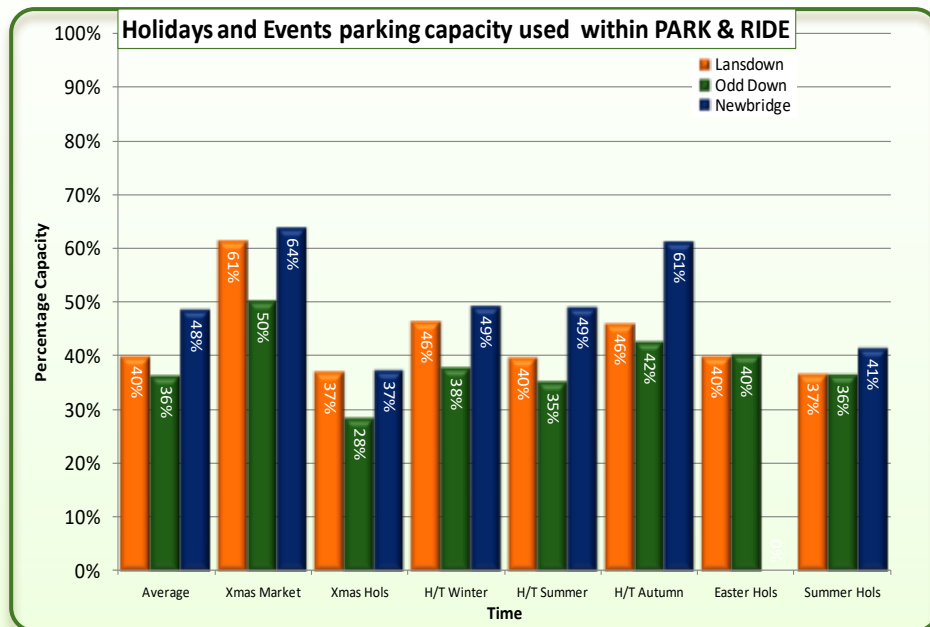
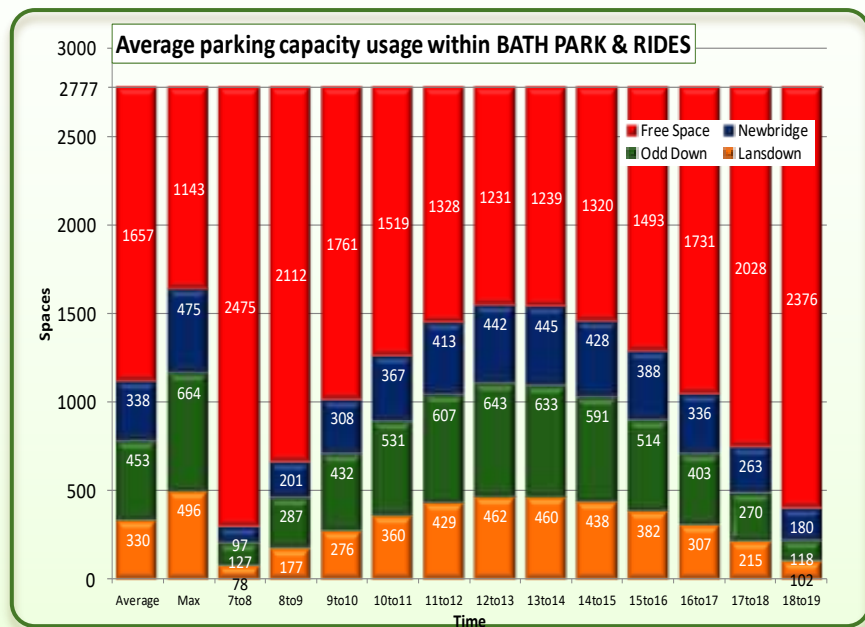
4.3 Bath's P&R usage has followed the same daily filling and emptying pattern since November 2011

- 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

4.3 cont. 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
- There 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.

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

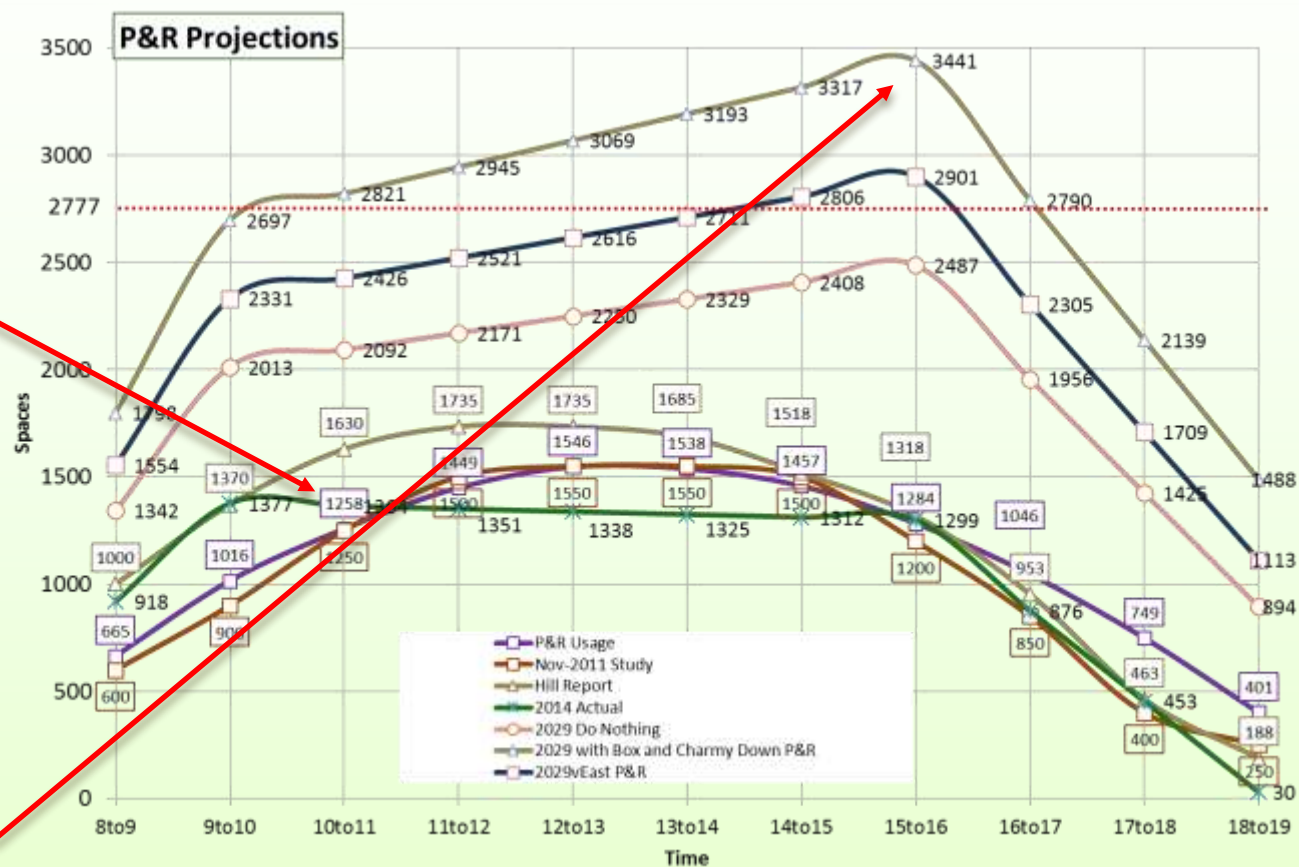
4.3 cont. Use has declined since Bath Package expansions approved

	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%)	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*

4.3 cont. 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.

4.4 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.

4.4 cont. 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:

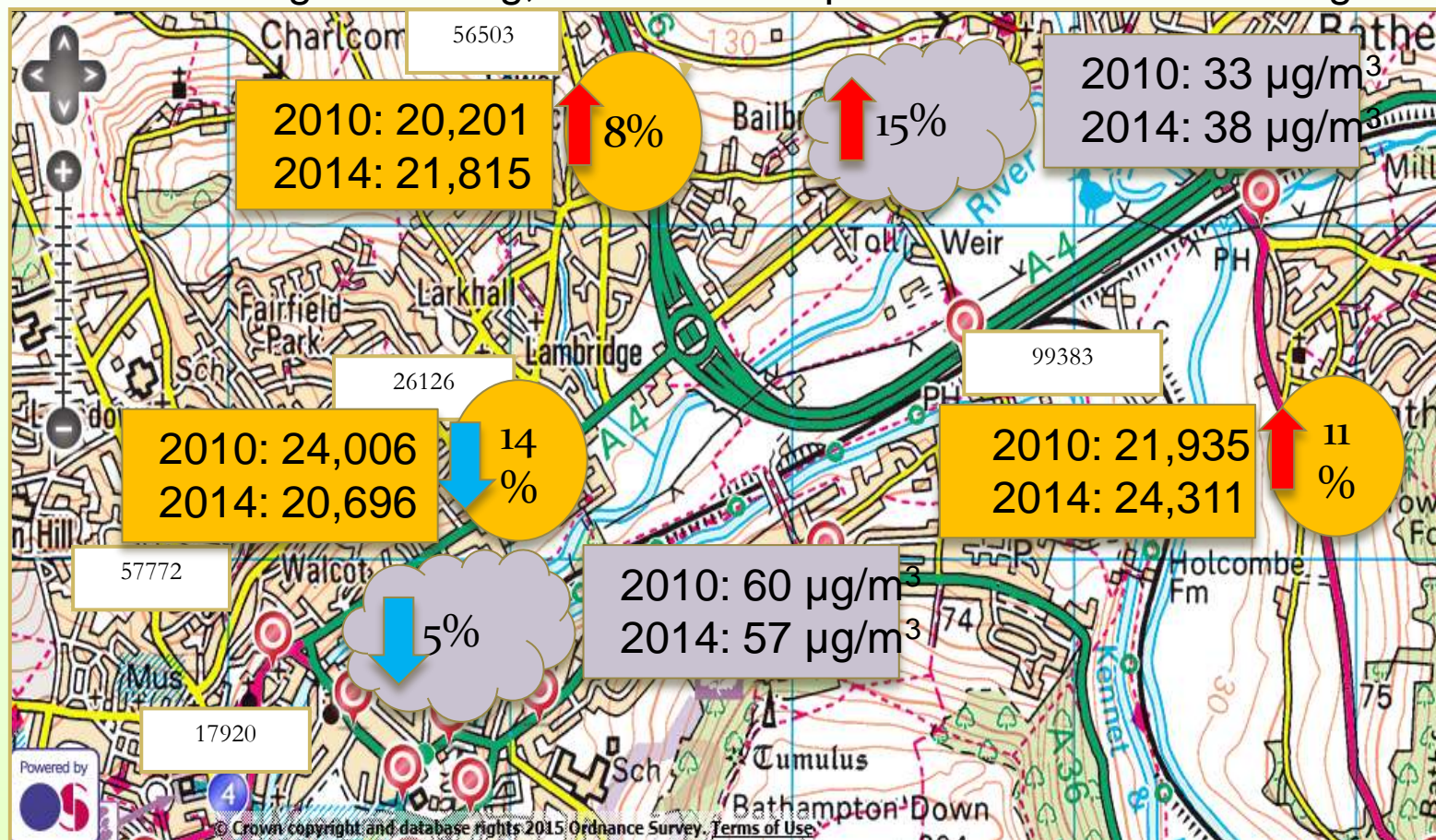
*"Substantial harm to or loss of designated heritage assets of the highest significance notably...World Heritage Sites, **should be wholly exceptional.**"*

- 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.

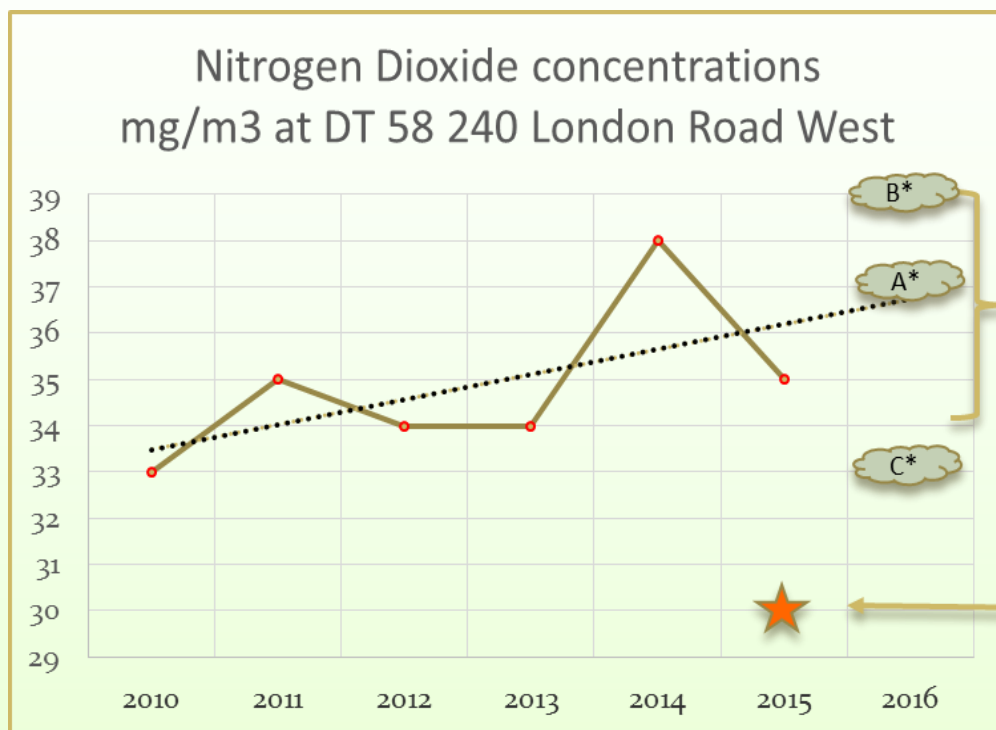
4.5. Beyond the WHS setting issue, both traffic and pollution in the Meadows basin is increasing with consequences for public health

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

Note: although declining, London Road pollution levels remain illegal



4.5 cont. 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.

4.5 cont. 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.”

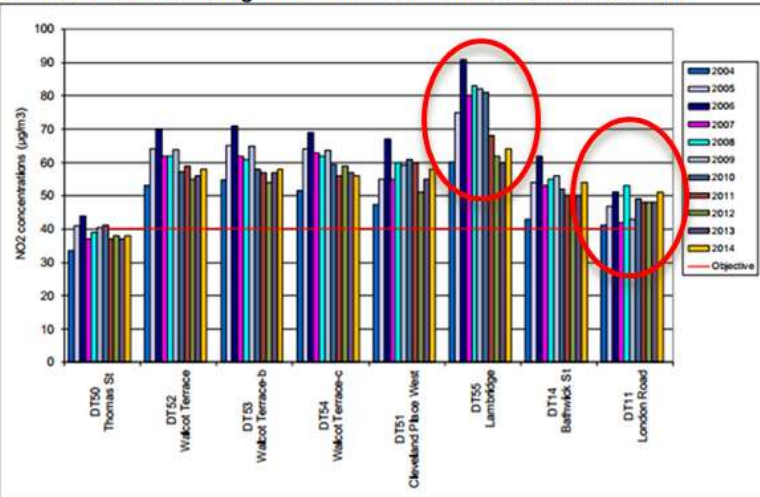
Environmental Audit committee chaired by Mary Creagh MP, published Sept 16, into Sustainability in the Department of Transport

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 be 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.

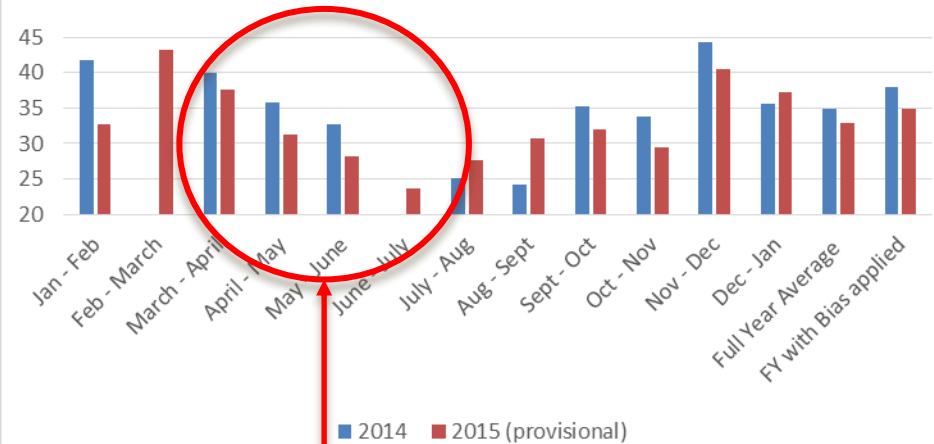
4.5 cont. There is evidence from Bath itself that getting traffic moving and enforced changes make a difference to emissions

Figure 2.4 Trends in Annual Mean Nitrogen Dioxide Concentration Measured at Diffusion Tube Monitoring Sites – Sites within the London Road AQMA



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

Monthly Nitrogen Dioxide Readings at 240 London Road (Batheaston High St) (in mg/m³)



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.*

4.6. 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?