

## DRAFT

### **B&NES Parking Strategy – Consultation Response from the Bathampton Meadows Alliance, October 2017**

*Our comments relate to the city of Bath aspects of this consultation.*

The Bathampton Meadows Alliance welcomes certain aspects of the Parking Strategy consultation, such as the establishment of a Stakeholder Group to help manage parking for known events, as well as the re-investment of funds into safer walking and cycling routes.

However, our concerns far outweigh these welcomed elements and it is our view that this Strategy should not be adopted. The Strategy:

1. Represents an unacceptable step backwards – the original aims of this parking strategy have been superseded and there is now a real imperative from National Government (Defra) for Bath to improve air quality;
2. Lacks an acceptable evidence base:
  - a. The off-street parking evidence used in the supporting technical document is both inaccurate and incomplete, while the evidence used in the park and ride section does not support the conclusions that are made. The move to relocate long-stay parking to the periphery falls down as a strategy because through-the-day parking data, not provided in the evidence base, tells us that commuters do not use these spaces in earnest today. Only Southgate Rail is filled with commuters.
  - b. There is no attempt made to set or quantify this strategy in the context of wider congestion and vehicle movements within the city. There is therefore no indication of the role that this parking strategy would play in achieving broader transport aims;
3. Contains no detailed or compelling discussion about what ‘sustain and enhance the vitality and viability’ means for Bath as a World Heritage City and therefore why it is right to pursue such car-centric proposals. This is especially true given the fast-paced and changing nature of cars currently.
4. Needs to state explicitly the financial contribution that B&NES receives from parking revenue and how it would change as a result of the draft strategy, so that the public can take this into account when they read the proposals.

## 1. The original aims of this Parking Strategy have been superseded by events

This parking strategy was briefed into private consultants CH2M in 2016 at a time when the Council was focused on justifying its intention to implement the highly controversial 4<sup>th</sup> park and ride scheme to the East of Bath. This is an important nuance, because the brief to consultants appears not to have been revisited in light of the decision this summer to abandon the East of Bath Park & Ride on Bathampton Meadows. The agenda of those promoting the now defunct East of Bath Scheme (who have now moved on) remains the one which has informed the brief to consultants, and unsubstantiable claims for park and ride continue to permeate the draft strategy.

Since the first draft of the strategy was completed in March 2017, three key events have superseded its relevance:

1. Defra has mandated Bath to achieve compliance with the Air Quality Directive in the shortest possible timeframe. Bath is one of 29 Local Authorities identified as failing to meet statutory air quality standards and is now the focus of national government efforts to put in place plans that will deliver lower air pollution levels in the shortest possible timeframe. Yet no mention is made of this in the draft Parking Strategy, and no apparent attempt has been made to co-ordinate the parking response of the Council with the Air Quality response which is simultaneously being formulated. The Parking Strategy should have at its heart policies which will support the urgent mandate from Defra to clean up our air and to fail to address this will have serious implications for public health.
2. The east of Bath Park and Ride has been abandoned. Cllr Mark Shelford has taken over the Cabinet Transport remit and has published a Vision, supported by his Group. This Vision has at its *'heart...the need to reduce the impact of cars on the city and promote sustainable transport options that ease congestion and tackle pollution'*

As part of this vision, Cllr Shelford has said the city needs to *'have a debate about innovative ideas that can reduce car volumes and discourage the most polluting vehicles, including HGVs, from entering and passing through the city'*.

This vision is in line with the Traffic Management Act of 2004, cited in section 2.2.1 of the Parking Strategy's Technical Document, which states that enforcement authorities *'should design parking policies with particular regard to: managing the traffic network to ensure expeditious movement of traffic (including pedestrians and cyclists); improving road safety, improving the local*

*environment, improving the quality and accessibility of public transport, meeting the needs of people with disabilities (some of whom will be able to use public transport and depend entirely on the use of a car), and managing and reconciling the competing demands for kerb space.*

Parking management is one of the key levers that the council has at its disposal to reduce car volumes and associated air pollution. And yet here is a proposal that not only maintains parking supply in the city centre at broadly today's levels (except for 336 spaces), but replaces 500 long-term off-street parking with short-term leading, in our view, to additional car movements. The strategy does not call out the potential increase in car movements generated by this switch from long to short term and instead Section 5.1 of the technical document states:

*Offstreet parking plays a pivotal role in managing traffic levels and reducing the harmful impacts of vehicular traffic on the town and city centres within B&NES. In Bath in particular, there is a need to restrict the growth of traffic in the city centre to ensure that, as a minimum, congestion and air quality impacts are not increased from their current levels despite the anticipated growth in jobs and housing*

The 2014 Core Strategy also sets out to 'broadly maintain central area car parking at existing levels in the short-term and prioritise management of that parking for short and medium-stay users', so there is a tension to be resolved amongst these various strands of local and national policy. If the Parking Strategy doggedly sticks to the goal of "broadly" maintaining current central city parking levels, but in reality may well increase churn, how will this Council achieve a reduction in vehicles as required by the recently published Vision, and mandated by Defra, or the expeditious movement of vehicles required by the Traffic Management Act?

If the Council doesn't intend to use the parking management lever to reduce the impact of vehicles, which lever will it use instead? Worryingly, the Parking Strategy makes no attempt to define or quantify the (pivotal) role of parking within the context of daily traffic flows within the City. For all we know as readers, reducing short-term parking could be the only thing that would genuinely impact daytime congestion levels in the city. As professionals and analysts, we know the reality is much more complex than this, but the over-simplification and lack of evidence based reasoning is likely to influence how people respond to the consultation.

It is extremely important that the Council does not adopt this parking strategy until the fuller context and options are explained. Only then will we know whether it is parking that is needed to be tackled or other causes of congestion, such as the school run or the phasing of lighting around the city. Or equally whether we need to do more to compel drivers to use existing park and ride – there remain over 1,000 free parking spaces in our P&Rs on an average day.

3. It is now understood that simply providing or building new park and ride capacity in Bath is unlikely to have any material impact on congestion and pollution levels in the city, especially at peak times.

As many of our documents have evidenced, park and ride will not be used in Bath if this does not meet the needs of the driver, or if there is a more convenient option closer to their destination (such as free on-street parking). The focus on park and ride is also unsustainable as it encourages drivers back into their private cars away from more sustainable modes, putting public bus services at risk, as well as generating extra journeys that increase pollution.

Until there is proper understanding of why drivers are in their cars in and around Bath and what would encourage/force them to use park and ride, park and ride should cease to be the primary solution to removing congestion from the city centre. Hoping that this will be achieved through amending pricing, as set out in this strategy, with no research to back this up is not sufficiently robust.

The next section on the evidence base behind this strategy gives more detail as to why the idea of moving commuters out of long-stay spaces in town to park and ride will have little impact on city centre congestion.

## **2. The evidence base is incomplete and inaccurate**

There are two aspects to this section:

- a. The off-street parking evidence used in the supporting technical document is both inaccurate and incomplete. This covers both (i) park and ride and (ii) city centre public car parks. The evidence used in the park and ride section does not support the conclusions that are made, while the move to relocate long-stay parking to the periphery falls down as a strategy because through-the-day parking data tells us that commuters do not use these spaces in earnest today. Only Southgate Rail is filled with commuters.
- b. There is no attempt made to set or quantify this strategy in the context of wider congestion and vehicle movements within the city. There is therefore no indication of the role that this parking strategy would play in achieving broader transport aims.

## 2.a.i Park and Ride (referring to Parking Strategy Technical Document Section 5.3 Park and Ride)

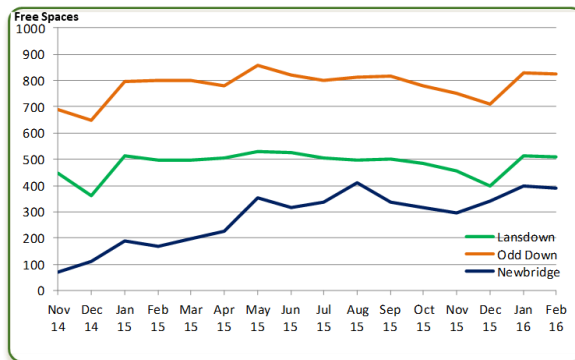
The executive summary to both the overall Parking Strategy and the Technical Document (TD) as well as the TD summary of the park and ride section makes the claim that P&R use is increasing;

*'Count and ticketing data shows that the patronage of existing sites serving bath is continuously growing'*

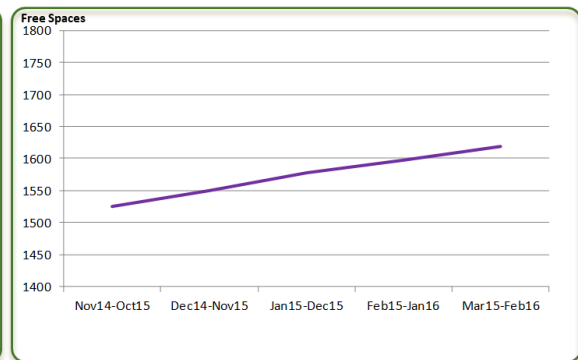
This statement is not substantiated by the data supplied and we are concerned that statements have been made that are not supported by evidence. The risk is that such reports become received wisdom and are incorrectly used to support future policy. **We expect the Council to either have this report amended or withdrawn.**

In either amending or withdrawing the report, we would ask the council to comment on the contradictory evidence provided by the BMA to the public meeting attended by Louise Fradd and Tim Warren in February 2016 that available space is in fact increasing, not decreasing, as set out in the charts below. These charts refer to average occupancy, rather than the average maximum occupancy that the council uses, but the trend is likely to be similar.

### Free Spaces in Bath Park & Rides



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



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

### Technical Document 5.3.1 Park and Ride

Graphs presented as figures 5-35, 5-37 and 5-39 in sections 5.3.1 – 5.3.3 give occupancy for Newbridge, Lansdown and Odd Down. There are a number of issues with these graphs:

- The data is not sourced, we have had to assume that it is derived from entry/exit counts

- There are no accompanying data tables and so we do not know if this is a full data set or if it has been derived from a small sample.
- The graphs are for a one-year period 1<sup>st</sup> of November 2015 to 31<sup>st</sup> October 2016, but they each have two November sections (each one different)
- The data appears not to have been cleansed of errors, peaks of up to 120% occupancy occur and troughs of zero; neither are likely to be correct.
- The y axis is shown as months but it is not clear if this is showing daily or weekly data
- There is no clear definition of what 'Max Occupancy' actually is and how it is derived

### **Technical Document 5.3.4 Impact of Expansion**

Two arguments are presented to support the claim that patronage is growing; firstly P&R occupancy and secondly P&R bus patronage but no data is provided that demonstrates an overall increase in use.

#### **Occupancy data**

Figures 5-40, 5-42 and 5-44 are titled '*Annual Daily Maximum Occupancy pre and post expansion of park and ride sites*'. One would expect from such a title that two data sets have been compared; one for occupancy pre-expansion and one for occupancy post-expansion, but this is not the case, only one data set has been used. In the case of Lansdown, the data gap from June 2016 to October 2016 has been replaced with June 2015 to October 2015 data. This is statistically a major error and undermines any analysis from it, as the data is not a continuous year.

Shown in green is the occupancy data for November 2015 to 31<sup>st</sup> October 2016 (post expansion) while the red area represents the hypothetical demand had the sites had not been expanded.

For example, Newbridge, P&R has been increased by 55% from 450 spaces to 698. The graph for Newbridge therefore takes the 2015/16 occupancy and applies a 55% uplift.

The problem with this method is that it only demonstrates that at busiest times demand would have exceeded supply. This does not mean that over a whole year period the use of P&R has grown, only that the peaks would have been busier and have resulted in queuing.

Furthermore, at Odd Down demand did not exceed supply even at peak times. Therefore when looking at all three sites together there is no evidence

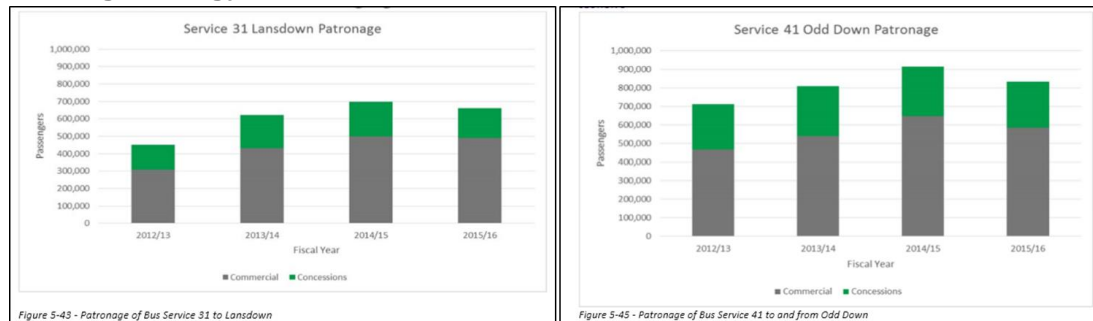
that P&R use has increased even at peak times. It could simply be the case that P&R users have switched to Newbridge and Lansdown from Odd Down, indeed this is what the bus passenger data suggests.

The only reliable way to demonstrate an increase in use of P&R post expansion is to compare two full year data sets, for pre and post expansion. Given that the occupancy data is only available from October 2014 and expansion was before this at Lansdown and Odd Down, and at Newbridge staggered expansion was completed in July 2015 such comparisons cannot be made. The BMA believes these charts are misleading in their current form providing a crude projected comparison rather than a statistically reliable one.

### P&R bus passenger numbers

At Section 5.3.4 bar charts are presented (covering the fiscal year) for bus patronage at each P&R site, Newbridge shows an increase in patronage post expansion, between 2014/15 and 2015/16. However Lansdown and Odd Down show a decrease since the full expansion was completed. This is in direct contradiction of the summary to the section that says *'Count and ticketing data shows that the patronage of existing sites serving bath is continuously growing'*. The relevant charts are shown below.

### Parking Strategy Technical Document Section 5.3.4 'The Impact of Expansion'



The report flags up the post expansion increase at Newbridge but does not highlight that passenger numbers decreased in 2015/16 at the other two sites. For Lansdown, which saw an increase in 2014/15 followed by a decrease the following year it is stated that service 31 'has also shown an increase' and for Odd Down the report states that service 41 'shows a continuously high usage'. Such statements are, at best, misleading and should be rectified. Overall passenger numbers have in fact declined in the two years since the P&R expansions were completed, as shown in the table below that was provided to the BMA in response to an FOIA request. In 2014/15 a total of 2124,082 passengers used P&R buses, in 2015/16 this fell to 2073,597 and in 2016/17 it reduced again to 2072,026.

These figures, along with and the bar charts presented in this report demonstrate that any increase in passengers from Newbridge post expansion has been more than offset by a decrease in passengers from Odd Down and Lansdown.

It is also clear from the notes supplied with this FOIA response that the total numbers include some intermediate passengers who board along the route and have never used a Park and Ride.

### **Park and Ride Conclusion**

BMA's analysis concludes that P&R use is declining rather than increasing, but the true trend will not be known unless the council commit to constant and regular monitoring going forward. We recommend that this is included as an action in the parking strategy.

Note: document continues on next page



Bath P&R Services 21, 31 & 41 Total Weekly Passengers 2008/09 - 2016/17.

Week No.	Total Weekly Passengers								
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
1	33,082	34,299	31,078	32,233	29,276	34,409	35,057	33,658	43,567
2	32,841	33,694	30,669	32,299	27,357	34,092	37,884	35,553	43,846
3	33,277	31,333	36,456	35,025	28,381	33,810	39,282	37,417	37,145
4	33,036	34,196	32,254	32,566	26,133	32,676	34,699	34,824	40,008
5	32,329	33,164	32,243	24,037	27,137	33,471	35,601	34,504	40,302
6	25,634	26,563	27,867	28,484	21,544	28,933	33,167	31,717	37,049
7	30,998	31,309	33,318	32,354	27,422	32,122	34,943	36,549	36,773
8	32,017	32,837	32,113	32,818	28,152	34,801	35,728	36,068	39,051
9	29,401	28,829	31,782	32,780	28,193	30,124	38,439	36,798	42,936
1	32,416	31,522	30,212	29,824	21,716	32,255	35,486	33,716	41,215
	32,014	31,982	32,371	32,369	29,684	31,237	35,656	34,839	38,165
	31,169	33,035	33,400	31,716	29,632	33,137	35,774	36,093	39,220
	33,145	31,063	32,120	32,266	29,844	33,006	35,977	35,744	33,151
	33,824	30,972	32,625	32,347	28,446	32,203	36,626	33,300	39,646
	31,748	32,520	33,845	32,604	31,121	32,320	37,963	36,066	41,092
	34,758	33,469	34,176	33,089	30,206	33,758	39,258	36,791	42,866
	34,566	34,393	35,720	34,322	29,675	34,328	40,528	37,238	41,833
	36,057	36,563	37,389	36,698	32,284	35,170	41,193	41,101	44,256
	36,582	35,806	37,149	36,117	32,929	38,707	43,084	40,897	43,088
	36,634	36,466	36,291	37,370	32,901	37,911	44,394	39,365	42,707
	38,297	36,795	38,955	35,893	32,640	39,576	45,446	40,987	38,014
	31,429	37,556	38,197	37,281	27,356	35,722	40,150	41,377	38,254
	33,770	29,742	30,520	29,511	30,457	33,962	37,644	33,920	34,263
	35,727	34,579	37,942	35,034	31,045	36,118	40,477	35,503	37,247
	34,367	35,495	36,160	34,546	31,686	34,150	41,183	35,503	37,801
	34,433	35,151	36,731	34,681	32,656	37,773	41,201	36,133	35,899
	33,544	33,114	36,580	33,986	31,604	35,353	37,255	36,339	35,632
	32,859	33,337	36,914	33,336	30,494	35,811	36,327	34,566	36,821
	33,990	33,089	34,699	33,244	30,655	38,363	37,012	38,780	35,565
	33,747	34,651	34,794	34,798	33,150	35,620	44,141	39,867	38,568
	37,906	40,553	39,977	39,451	32,501	38,891	48,402	44,698	42,794
	35,535	37,994	35,384	35,185	32,527	39,241	38,664	36,907	35,767
	36,201	39,880	35,963	37,294	31,559	43,686	42,933	40,972	38,205
	36,783	40,219	41,383	40,382	41,724	44,749	44,064	45,842	39,709
	52,277	52,805	49,433	50,934	56,612	67,396	70,439	69,537	64,575
	65,133	63,602	48,515	53,730	55,408	72,268	80,048	84,307	81,765
	43,156	46,747	54,385	50,160	39,439	68,738	74,801	82,507	78,686
	42,384	41,232	33,827	33,945	36,941	45,687	46,676	51,791	43,813
	29,102	19,972	21,055	32,902	22,933	28,244	34,013	32,555	36,334
	32,662	30,296	29,904	27,363	29,061	29,886	37,904	37,677	35,461
	30,714	15,524	27,372	22,428	31,207	35,500	37,605	37,401	31,538
	29,565	22,034	31,447	28,019	20,111	34,564	33,618	34,768	28,220
	30,657	31,933	30,852	26,430	24,067	35,580	36,593	37,983	33,747
	31,382	31,671	32,025	28,477	27,403	32,881	34,187	35,356	30,243
	12,246	32,476	29,447	23,102	30,347	32,214	37,257	33,559	29,932
	31,070	31,321	30,200	25,883	35,323	29,135	35,523	36,105	29,409
	38,722	37,036	32,444	33,851	31,947	43,551	44,495	42,924	41,089
	33,226	31,041	35,768	27,736	39,803	40,717	43,256	37,916	31,407
	34,145	37,690	37,691	28,604	31,898	39,026	39,499	38,864	32,994
	40,422	32,192	32,099	35,396	30,377	35,481	37,662	42,852	41,587
	33,727	31,592	31,562	26,873	31,067	35,491	37,493	38,765	33,951
	33,499	32,194	33,106	27,702	31,922	37,404	37,375	35,099	34,820
				28,953					
<b>Total</b>		<b>1,777,528</b>	<b>1,798,409</b>	<b>1,758,428</b>	<b>1,627,953</b>	<b>1,941,247</b>	<b>2,124,082</b>	<b>2,073,597</b>	<b>2,072,026</b>
<b>Change since</b>								<b>285,392</b>	<b>283,821</b>
<b>% Change</b>								<b>16.0%</b>	<b>15.9%</b>

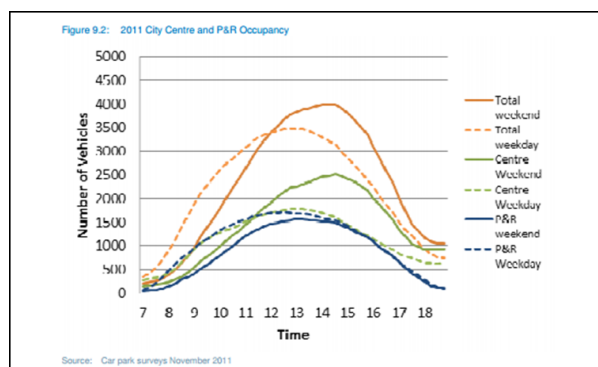
**2.a.ii City Centre parking (referring to Section 5.2 of Managing Public Off Street Parking)**

The data set chosen to quantify demand for city centre off street parking in section 5.2 is Pay and Display transactions and Cashless payments and yet this data set does not let the analysts identify how long a driver actually stays. They have had to assume that the vehicle remains for the full duration of their ticket. This gives a maximum number of vehicles that could be in the car park at any given time, but has not been converted to any profile of what parking looks like through the day or by day of week. If the data set does not readily allow this, then it is not understood why entry and exit count data, available on

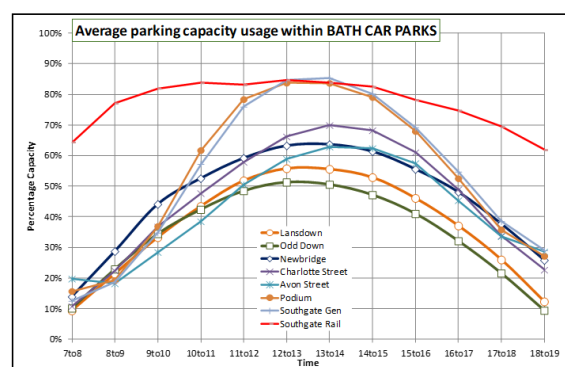
Bath Hacked isn't also used to provide this through-the-day picture and a balance to the maximum potential fill data supplied.

The reason that a through the day picture matters so much is that core to the proposals to reduce the impact of cars into the city is to remove long-stay parking and these associated commuters to the periphery. However the report provides no evidence to show how many commuters use long stay car parks or how many vehicles are parked 'long term' that could reasonably be expected to transfer to Park and Ride freeing up space for short term parking. Without quantifying this it is impossible to know if the proposed strategy would succeed.

The evidence we are aware of demonstrates that this is not how drivers park today – just as in park and rides, parking levels in city centre long-stay car parks are lowest when congestion is at its highest. This bell-curve profile is seen in both B&NES charts and B&NES data:



Source: Background to the GAB Transport Strategy 2014



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

Other than Southgate Rail, commuters do not use long-stay city parking any more than they use park and ride at this time of day. There will not be anything like 836 fewer commuter trips in, as suggested in section 5.2.2, if long-stay parking is removed. As the chart above shows, the user profile of Charlotte St and Avon St follow short stay car parks.

A second assumption also needs to be challenged from section 5.2.2. Why is it sensible for the council to be encouraging overspill from the affected Cattlemarket, Avon St and Manvers St round to Charlotte St where there is some capacity (Action PSA7)? This is not a desk-based exercise – it relates to car movements in an already busy City where pollution is over EU limit values. To encourage such extra churn is irresponsible.

Finally, we find it difficult to understand how it can be that private consultants, being paid taxpayers' money, seemingly cannot do simple cross checks of data between sections. In section 5.2.1, it is stated in tables 5-1 and 5-2 that

Manvers St has 161 spaces, Avon Street 512 and Cattle Market 40, totaling 713 spaces. And yet in section 5.2.2, it is discussed that these three total 836 spaces and that closing these three car parks and replacing with 500 short stay spaces (presumably at Charlotte St) will result in a net loss of 336 spaces. If the data in the tables is to be believed then the net loss is lower at 213.

## **2.b Quantifying the context in which the parking strategy sits**

Asking the public to comment on plans is only meaningful if those being consulted understand the net impact of a proposal in a way that is quantified. In this document, contribution statements are woolly and there is no attempt to set these woolly statements in the context of the part parking plays in the congestion picture of the city.

There is no attempt made to say what proportion parking represents out of total vehicle movements, at different times of day, or indeed from different geographical directions. There is no understanding included as to why drivers are parking in the way that they are and why it is therefore that the strategy of even maintaining existing contributions to congestion levels will be successful.

Quantifying the contribution is also only possible if the underlying data supporting the statements is of a decent standard. As is set out above, we are critical of the off-street analysis conducted to date.

## **3. There is no detailed or compelling discussion about why Bath needs private cars driving right into it in order to maintain its vitality and viability**

In the technical document, there is reference to the fact that Bath is different to other towns in the strategy because it is more easily accessed by modes other than the private car.

*Section 5.1 Simultaneously the management of parking must not detrimentally affect the vibrancy and economic viability within the town and city centres. This is most pertinent in Keynsham and the Somer Valley where the prosperity of the local high streets is heavily reliant on access by car.*

It is therefore not well-enough explained why this continued approach of bringing cars right to the centre remains the most appropriate for Bath as a polluted World Heritage City. In fact there is no attempt to explain it – it is simply repeated each time there is a statement about having to reduce car impacts as the balancing factor that means cars should continue to enter to park. It is as though this undefined ‘vitality and viability’ needs no further

debate and that having cars in the centre is acceptable on balance. We would argue that for air pollution and congestion reasons it is not unless there are good alternative ways to reduce congestion and hence pollution.

For any consultation to be meaningful, the council needs to evidence the case for 'vitality and viability' only being possible via significant city centre parking. There are tools at its disposal to analyse its strengths and weaknesses, such as via leading High St analyst Springboard, who runs the National High Street Index. Springboard has identified 12 factors that contribute to a town centre's vitality. Factors identified include rents and yields, employment levels and customer profile, as well as available parking. While footfall will of course be critical in this mix, this does not have to equal parking.

Nor is it right to simply assume that relocating cars to the periphery or Setting of the World Heritage City is the priority solution to tackle via new Park and Ride as these areas have their own definitions of vitality and viability to maintain and enhance.

Our hope is that the Council will reframe its approach to one of 'How do we best move more people to Bath to ensure the City maintains and grows its vitality' and properly joins this document up with the mandate from Defra and research into causes of congestion and what would reduce them. This instead of leaping straight to accommodating the status quo of short-term parking. By having this as the objective, there is far greater chance of achieving a reduction in cars that the latest Vision calls for and would lead to a more balanced summary that looks at the range of levers at the council's disposal

### **Overall Conclusion**

This strategy appears to be a legacy document, littered with previous thinking and with too little quantification or evidence at its base. It should not be adopted unless:

1. The principles and aims are revised to reflect the Defra mandate to lower air pollution and the council's plans in this area are understood so that links between the parking strategy, the transport strategy and air quality action plan are understood
2. It is clear which other levers could be pulled to reduce congestion and hence pollution and by how much – tackling congestion from the school run, better traffic light phasing, congestions charging, more affordable and reliable public transport, especially from the East of Bath are just some ideas
3. The strategy is validated by far greater evidence and research, which is accurate in nature. This evidence base should culminate in a summary of the

parking status quo and a quantified analysis of the impact of the initiatives outlined. The absence of this quantification is unacceptable.

4. Inaccurate comments relating to park and ride are amended or deleted.
5. It is clear what the proposed strategy would mean for revenue for the council vs today's income, so that any internal pressures to maintain income from parking are at least transparent

Authors: Fiona Powell, Christine Boyd, Annie Kilvington and Andrew Lea of the Bathampton Meadows Alliance

<http://bathamptonmeadowsalliance.org.uk/>  
[Email: bmeadowsalliance@gmail.com](mailto:bmeadowsalliance@gmail.com)