

# BATH ALLIANCE FOR TRANSPORT AND PUBLIC REALM

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## Response to consultation on the Bath Transport Delivery Action Plan

### General

1. The Bath Alliance for Transport and Public Realm ('the Alliance') is an association of 21 major employers, institutions, businesses, housing providers, residents, public transport providers, universities and custodians of Bath representing a spectrum of transport interests across the city. The Alliance's members share a common goal of resolving the city's transport problems. From its inception in 2016, the Alliance has campaigned for the development of a comprehensive Bath transport plan to implement the 2014 Bath Transport Strategy. Therefore we warmly welcome the development of the Bath Transport Delivery Action Plan (BTDAP). We are grateful to have been invited to participate in two BTDAP workshops and would, as a group of key Bath stakeholders, very much welcome continuing involvement to assist in the development of the Plan. The following comments are offered in a spirit of constructive engagement.

2. The current BTDAP paper dated April 2020 antedates the approval of the Liveable Neighbourhoods (LN) policy, including the intended introduction of Low Traffic Neighbourhoods (LTN). No doubt the future development of the Plan will cover LN. This is essential, as, while we welcome LTNs, they have the potential to make a significant impact on traffic movement, including in the central area of the city, as a result of traffic displacement onto the distributor road network. Moreover, the LN policy also covers Electric Vehicles (EV), but the problem of how to charge the myriad EVs expected in the city is not addressed, particularly in historic streets, without off-road land where these facilities could be based.

### Vision

3. The BTDAP Vision is taken from the Vision statement of the Bath Transport Strategy. While we recognise and welcome the broad aim of reducing traffic particularly in the historic core, that Vision is not specific in terms of the desired outcome. Is the aim to reduce traffic by 10%, 50% or 90%? The Alliance's Vision is of Bath as:

*A beautiful city in a green setting, with vibrant public spaces, a historic centre free of all but essential traffic\*, clean air and excellent transport infrastructure.*

The B&NES Local Plan uses a similar formulation:

*"Its [the Bath Transport Strategy] delivery will work towards the creation of a city centre that is free of all but essential traffic, and which provides an environment that is attractive for businesses and visitors on which the city's economy relies, as well as for those who live and work in Bath." (Placemaking Plan Part 2, p86, paragraph 82)*

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\* eg Deliveries, cleansing, buses, taxis, key business needs, disabled, and access for residents to their homes and nearby on-street parking

4. The other issue is that the Bath Transport Strategy does not actually define the 'historic core' and in fact this is nowhere defined in Council policy. Presumably it is intended to cover the Georgian area of Bath as well as the city centre itself, broadly the area covered by the Public Realm and Movement Strategy (map at Annex A). The Local Plan formulation is more specific in terms of the desired end state of the Strategy. We suggest that you consider revising the BTDA Vision along these lines. It would be helpful to include a definition of the central area covered by the Vision. We suggest a simple definition based on a radius from the centre – as in the city guide at Annex B, for example.

### **Park and Ride (P&R)**

5. We welcome the recognition (p64) of the vital importance of P&R to enable the reduction of parking, and hence of traffic, in the central area. Given this, it is disappointing that the Council has concluded that there are no deliverable sites for a P&R east of Bath. It is essential, if traffic into the centre is to be reduced, that people travelling from the east have a viable alternative to the private car. We welcome the statement that alternative solutions to tackling these issues are now being explored, and we trust that this will be elevated to a key Action in Phase 2. This will require close working with Wiltshire County Council as well as the bus companies.

### **Coaches**

6. The report refers to the 2017 coach strategy as something that 'was never formally adopted', as if some formality had been omitted. In fact the strategy was totally flawed and was withdrawn. It ignored the Vision of the Bath Transport Strategy to reduce the intrusion of vehicles, by proposing coach drop-off points in the city centre. The views of coach operators, drivers and passengers were surveyed but not those of Bath residents or other stakeholders. A critique of the strategy by the Federation of Bath Residents' Associations (FoBRA) is attached.

7. The BTDA should recognise that the 2017 strategy does not provide a satisfactory basis for action. The entire strategy should be revisited in the next iteration of the Plan. Section A.3.7, page 157 should be deleted pending this work as it has no basis in B&NES Council policy and is contrary to the Vision of the BTDA.

### **Motor Traffic and Freight**

8. We welcome the recognition that motor traffic volumes in Bath are continuing to have a detrimental impact on the quality of life of Bath residents and the fabric of its urban realm and the World Heritage Site, and that there is still heavy congestion in areas of Bath (p73). ST5 of the draft Local Plan revision includes the aim to 'achieve modal shift through discouraging short car journeys'. Modal shift is essential, but this is an issue of traffic coming into and through Bath as much as short internal trips, which comprise only one third of car traffic in the city.

9. Defining through traffic as a trip that goes all the way through Bath from one side to the other (p72) understates the impact of traffic through the city, especially the city centre. Most traffic in central Bath is through traffic *with respect to the city centre*, since it does not originate or terminate there; for example a trip from Larkhall to Keynsham is not regarded as through traffic, but should be.

10. The benefits of an alternative route for through traffic are not limited to cars (see below), and this should not be ruled out (p72). The fact that the Bathampton toll bridge has become the de facto 'link road', with 8,000 vehicle movements a day, imposes a heavy burden on Bathampton and Batheaston villages which should not be dismissed.

11. We have concerns about the data on which the draft Plan is based. Much of the traffic data is old, from the 2011 census. There have been significant changes since then, including the expansion of the P&R sites. The ANPR data is based on a short survey in 2017. Copious up-to-date data should be available shortly from the ANPR cameras installed for the Clean Air Zone, and data from the 2021 census will be available before long.

12. Overall percentages can be misleading. It is stated at p88 that 'only 12% of Light Goods Vehicle and 9% of Heavy Goods Vehicle traffic is through traffic'. However, the absolute amount of through traffic and its location is important. This represents well over 1,000 through traffic movements, mainly of HGVs and mainly on the A4 and A36, and that probably does not catch the many foreign HGVs since it is based on ANPR data. This volume of HGVs is very significant and has an effect on congestion throughout the city, as other traffic cannot get out on to the London Road due to the congestion there. The everyday experience on London Road, Bathwick Street and the A36 is of constant heavy HGV traffic. The temporary HGV weight restriction on Cleveland Bridge (prior to lockdown) resulted in a marked reduction of congestion along this route and much freer flowing traffic. The report should present the actual figures for HGV through traffic.

13. In our view through HGV traffic does make a major contribution to traffic congestion and air pollution in the city. That will be exacerbated by the return of full HGV traffic after the repairs to Cleveland Bridge. The next iteration of the BTDAP should include an Action to discuss with DfT the replacement of this part of the SRN by a more suitable alternative route, in line with the statement in the Local Plan that "The Council will work with neighbouring authorities, including Wiltshire Council, to address the problem of through traffic in Bath, particularly traffic that currently uses the A36-A46 route through the city and continue to press Highways England and Transport Ministers to take steps for solutions to be identified and funded in the next Road Investment Strategy to be published in 2020." (Placemaking Plan Part 1, page 192, paragraph 582). The aim should be to enable a permanent weight limit on Cleveland Bridge to be put in place.

### **Parking**

14. We welcome the clear statement that parking plays a key role in managing car traffic demand. We support reduced visitor parking on- and off-street in the central area to reduce traffic into the city, as well as parking control to reduce traffic in all residential areas as part of the Liveable Neighbourhoods strategy.

### **Future policy**

15. Numerous B&NES Council policy statements convey an intention to reduce car traffic in Bath. As well as the Bath Transport Strategy, the draft Local Plan revision has the stated objective of achieving a 'major shift to mass transport' (p5 para 2.3) in response to the Climate Emergency declaration. This is also an important objective for the Liveable Neighbourhoods strategy. That will require measures actively to discourage private car use

through parking control and traffic management, complemented by better and more affordable public transport.

16. These important initiatives must be developed within the context of a coherent transport plan for Bath. The next iteration of the BTDA should include an Action to develop a traffic movement plan, which would sit under Policy GABP4 'Vehicle movement should be better managed to reduce traffic impact and emissions, particularly in the city centre where there is less space available', with the clear objective of reducing overall traffic volumes in the city and removing inessential traffic from the centre. This is an especially important enabler for the Low Traffic Neighbourhoods scheme. The traffic movement plan would complement and interface with strategies for improving public transport, improved school travel arrangements to reduce the impact of the school run, walking and cycling, parking, etc. The bus, pedestrian and cycle networks should be compatible with and integrated with the vehicle circulation plan.

17. The plan should aim to ensure that WECA's Bus Strategy delivers network and fares reform sufficient to make buses competitive with cars. The Alliance provided broadly supportive comment on the draft Bus Strategy (copy attached). It is important that it addresses the implementation of the high capacity public transport routes on the very restricted roads leading to the city centre.

Robin Kerr

Final dated 27<sup>th</sup> February 2021

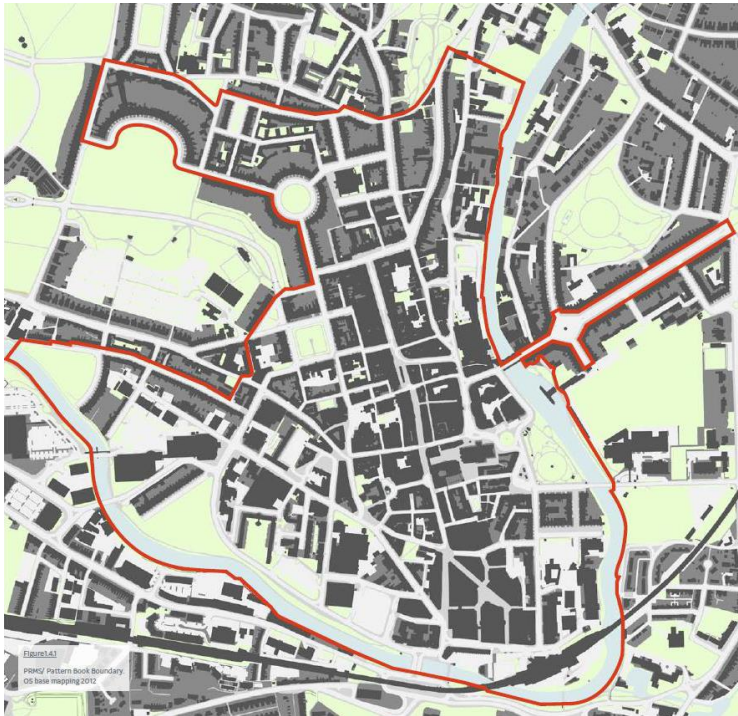
Annex A: Central Bath area covered by the Public Realm and Movement Strategy

Annex B: Central area guide

Attachments: FoBRA critique of the 2017 draft Coach Strategy

Alliance comments on WECA's draft Bus Strategy

## Annex A: Area covered by PRMS



## Annex B: Central area guide

