

B&NES' Consultation on Local Plan Partial Update (LPPU) and Transport and Development Supplementary Planning Document (SPD)

Comments by Bath Alliance for Transport and Public Realm

1. The Bath Alliance for Transport and Public Realm ('The Alliance') is an association of 22 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 members share a common goal of resolving the city's transport problems.

2. Excellent transport and public realm lie at the heart of realising Bath's full potential as a city. Currently, Bath is falling far short of its potential. The city suffers from high levels of traffic congestion, which prevent free movement of pedestrians, deter cyclists, block buses, impose economic costs and spoil the city experience for residents, workers and visitors. High levels of air pollution, largely caused by vehicles, harm the health of residents, workers and visitors and damage the historic buildings. Vehicles in Bath cause a significant amount of the city's carbon emissions, contributing to the climate emergency. Bath has a dysfunctional transport system, with over-reliance on private cars, inadequate public transport alternatives, and a free-for-all for commercial vehicles.

LPPU

3. Many of the changes proposed in the LPPU are designed to incorporate and reflect the climate emergency declaration, the Clean Air Plan and the liveable neighbourhoods strategy. The Alliance welcomes this as these policies all tend towards reducing private car use. The Alliance supports the Bath Transport Strategy and welcomes the development of the Bath Transport Delivery Action Plan to implement the Strategy. We fully endorse the statement at para 99, page 28 of Part 2 (Bath) of the existing Local Plan that: "The delivery of the [Bath Transport] Strategy is essential to enable the city to meet its growth objectives and to improve the quality of life within the city. Its 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." This closely aligns with the Alliance's vision for Bath.

4. However, we consider the proposed LPPU to be unsound in that, while it recognises the need to reduce car dependency and achieve modal shift from private cars, it fails to set out measures to discourage private car use such as parking control to discourage private cars from coming into the city, or traffic management to reduce through traffic both in the central area and the city as a whole. Reducing traffic coming into and through the historic core is vital, but this will require a comprehensive traffic management plan to reduce overall traffic volumes in the city and avoid simply displacing traffic elsewhere.

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5. Through traffic in the city as a whole is a key issue, and we are dismayed by the proposal to remove from the Plan Part 1, para 582, p212: "The Council remains concerned with the impact of through traffic, particularly HGVs, on the WHS. This is compounded by the incomplete nature of the Trunk Road Network to the east of the city. 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."

6. This is regrettable, particularly given the Council's stated intention to reduce HGV through traffic and reintroduce an HGV weight limit on Cleveland Bridge. It is also inconsistent with the statement in the existing Local Plan, Part 2, para 98, p.28: "Working with the Highways Agency, Wiltshire and other authorities to develop proposals and strategies to remove through traffic and HGVs, in particular, from Bath." The section is therefore unsound as there is a core need for a different north-south route running east of Bath, instead of over the Cleveland Bridge along fragile historic sites on Bathwick Street and London Road; this could be in Wiltshire, or along the A34-M4, or branching off the Batheaston Bypass, but it needs real engagement and serious work with Wiltshire. Para 582 should be retained in the LPPU and the issue treated with urgency.

7. Part 1, p.213, para 589b – climate emergency – the proposed changes include a target of a 25% reduction in car and van mileage per person by 2030. 'Mileage per person' is difficult to measure. Why not just aim for a 25% reduction in vehicle numbers? Also, as noted above, there are no measures directly aimed at discouraging cars and vans. Simply encouraging alternatives will not be enough to change driver behaviour, so we conclude that this section is unsound.

8. Part 1, pp 218-221, para 618 and Policy ST6– we welcome the recognition that park and ride has an important role in reducing car use by providing an alternative to driving into the city. We also welcome the idea that the park and ride (P&R) services, at existing and new facilities, could be expanded to become "Interchange Hubs".

9. Given this recognition of the importance of park and ride in reducing traffic into the city, it is disappointing that the Council has concluded that there are no deliverable sites for a P&R east of Bath (para 619 revision). It is essential, if traffic into the centre is to be reduced, that people travelling into Bath from the east have a viable alternative to the private car. This should be treated as a matter of high importance and urgency, and hence this section is unsound.

Transport and Development SPD

10. Section 4 – parking standards – para 4.5.1, p51, sets out a 'Bath city centre' Parking Standards Zone which appears to be coterminous with the Bath Clean Air

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Zone (rather than the city centre as defined in the current Local Plan). We note that in this Zone, 0.5 spaces will be permitted for C3 dwelling houses and zero for other use classes. Given the severe space constraints within the area, this seems reasonable.

11. However, we note that the remainder of the City is proposed to be included in a 'Zone B – Outer Bath, Keynsham and Saltford'. We believe that the constraints within the city warrant the retention of a separate Bath Outer Zone with stricter standards appropriate to the city, and on this basis the draft SPD is unsound.

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