

## **Federation of Bath Residents' Associations (FOBRA)**

### **Response to B&NES consultation on Coach Strategy**

1. This strategy is totally flawed. It fails to recognise the severe adverse impact of coach traffic on the city, analyse the contribution that coaches are claimed to make to the economy, or attempt to strike any kind of balance between the two. Essentially, the approach has been to ask what the coach operators, drivers and passengers want, and accommodate them without regard to the impact on the city or its residents. Buro Happold conducted surveys of the views of coach companies, drivers and passengers, but none of Bath residents. FOBRA attended the Stakeholder meeting in October 2016 and made these points, but no account has been taken of our views.
2. In the view of many residents (and some businesses), coaches are a plague. They park illegally. They leave their engines running. They are visually intrusive and generate high levels of congestion and air pollution. Yet they are currently permitted to come into the very heart of the city and drop off just metres from some of the Key Elements of the World Heritage Site such as the Roman Baths, the Abbey and North Parade. They park at Royal Avenue, within view of Royal Crescent, before departing through the city centre. Others drive twice round The Circus (another Key element of the WHS) before departing for Stonehenge or wherever. Coach demand is forecast to increase by 24% by 2026.
3. One of the places worst affected by coaches is Terrace Walk, where Buro Happold report 50 coaches arriving each day. Local residents' impressions are of much higher coach traffic. Whatever the actual number of arrivals, coaches create enormous congestion there and on the approach roads, gravely affecting the amenity of the area. Air pollution nearby in Manvers Street is 44 micrograms per cubic metre ( $\mu\text{g}/\text{m}^3$ ) of nitrogen dioxide, significantly over the legal limit of 40  $\mu\text{g}/\text{m}^3$ . There is no published data for Terrace Walk itself, but pollution there is likely to be higher because of the concentration of coaches. The source analysis in the consultation on the Bath Air Quality Action Plan (AQAP) shows that 79% of air pollution in the area (as well as in Dorchester Street and St. James's Parade) is generated by buses and coaches. Yet the strategy actually proposes to increase coach parking in Terrace Walk, and to formalise and increase parking at Royal Avenue.
4. The strategy document nods at B&NES Council policies to reduce traffic in Bath, but then ignores them. All B&NES's higher level plans call for the *reduction* of traffic in Bath. The Core Strategy calls for a largely car-free city centre. The Placemaking Plan (PMP) calls for a city centre free of all but essential traffic, while the Public Realm and Movement Strategy (PRMS) sets out a compelling vision of beautiful public spaces free of traffic (including Manvers Street and Orange Grove). The Bath Transport Strategy sets out a road map for achieving this, with the overall vision of reducing the intrusion of traffic *especially in the historic core*. In addition, B&NES will be required by the Government in its next Air Quality Action Plan (AQAP) to bring air pollution in the city within legal limits in the shortest possible time. The proposals in the strategy are quite incompatible with these policies, and a wasted opportunity to improve our city.
5. The World Heritage Site Management Plan recognises that coach traffic 'can be problematic', especially in terms of parking, and contains an Action 42: 'Engage with proposals to address coach parking within the WHS, and seek to ensure that sustainable

solutions are delivered which maximise the benefit and minimise any harm to the WHS'. We do not believe that this strategy achieves that objective.

6. On the other hand, there is little analysis of the actual contribution to the economy made by various types of coach visitors. The Destination Management Plan states that two-thirds of coaches stay for less than 3 hours. Most visitors make a very limited contribution to the economy, with 50% spending less than £30, little of which necessarily stays in Bath. They may make a direct contribution to B&NES's coffers if they visit the Roman Baths, but that cannot be an overriding factor. Arguably short-stay, low-spending visitors contribute less to the city than the harm they cause.

7. We welcome the creation of a coach park at Odd Down. However the drop-offs should be provided at less congested locations outside the city centre and away from the iconic places that form the essence of the Bath experience: for example in the areas of Pulteney Road or Lower Bristol Road (accessing the centre via the new Bath Quays bridge). Figure 1 of the Executive Summary highlights locations that could be used, although they are identified as places for parking rather than drop-off. They are within a reasonable walking distance of the attractions. Special arrangements could be made for disabled passengers. York provides an excellent example: there coaches are not allowed into the historic city centre.

8. That might affect the operators' schedules, and some customers might dislike the idea of walking a little distance. Some may choose not to visit, but that should be an acceptable price for protecting our city. Neither B&NES nor the residents of Bath are under any obligation to provide business for the coach operators.

9. Another alternative would be to drop off coach passengers at the Park and Rides, from where they would travel in on the P&R buses. That is listed as an aspiration for the long term, but there is no good reason why it should not begin within a year or two.

10. We have not commented on the detail of the proposals, as the whole document is so flawed. However, the proposal to put four to six coach bays on Green Park Road is particularly egregious. It would ruin the riverside setting of Green Park, which is used by young children including a growing number of visiting school groups.

11. Restrictions should be placed on the streets that can be used by coaches in the central area, such as High Street. The coach ban currently in force in Brock Street should be extended to Bennet Street and Gay Street so as to remove the coaches which drive round The Circus causing congestion and pollution and no benefit to Bath.

12. B&NES Council should reject this document and direct that a revised strategy for coach parking and coach movement is prepared which is consistent with the traffic reduction aims of the Core Strategy, PMP, Transport Strategy and the PRMS, and the requirement which has been placed on the Council to bring air pollution within the legal limit as soon as possible. The revised strategy should include a full analysis of the economic benefits of the various types of coach visits (eg those that drive round without stopping; short-stay trips; and those delivering longer-stay visitors), in line with the aspiration of the Destination Management Plan to pursue value and quality, not just more tourists. Coaches must be managed, not simply accommodated.

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