

Planning Applications 23/03558/EFUL and 23/03559/LBA

Arena 1865 Ltd

The Federation of Bath Residents' Associations (FoBRA) has submitted an Objection to the above applications which, whilst supporting replacement of the current rugby stadium by a new stadium appropriate to the heritage and residential setting and greater use for sports, set out objections on grounds of contradictions and omissions in the data used to assess the transport impacts, and absence or inadequacy of measures controlling usage, commercial activity and protecting residential amenity. As foreshadowed in our earlier submission, we are now writing pursuant to the transport- and access-related grounds we previously outlined in summary, in order to set out in more detail the substance of those grounds.

The applicant chooses to seek to develop a multi-use stadium with additional commercial premises in the heart of the City of Bath World Heritage Site, in a setting surrounded by historic buildings, in a physically constrained site, on a constrained elderly urban highways network, in close proximity to numerous homes and the city centre. These are all aspects of the site that require addressing, and with a level of care and detail that is currently absent.

Baselines for evaluation

Traffic impacts may be substantial both locally and over a wider area, and proper evaluation needs to be insisted upon. Throughout the application content on transport/access there is a lack of clarity and much inconsistency regarding the baselines against which evaluation is needed.

Number of events: Whilst the application asserts that 31 events are held at the venue annually, this figure does not appear to be supported by data in the application. Publicly available information suggests the maximum number of events held in the 2022/23 season may have been 22. If a higher baseline is asserted, evidence should be provided. Overall, it is currently unclear from the application what is asserted as both the baseline and composition of future events.

Capacity: Current maximum stadium capacity has been reached over a number of years through a series of temporary planning applications, accompanied by suggestions that unsatisfactory temporary arrangements would soon be superseded. There is an implied assumption in the application that the impacts from the existing arrangements are acceptable, but this is not in fact supported in the application. The transport and access impacts of the current capacity of 14,500 are currently not properly managed, with inappropriate driver behaviour such as double parking, blocking of parking bays and entrances, dangerous parking, and engine idling being widespread in local residential roads. The applicant should be required to present data and modelling which demonstrates how a capacity of 18,000 would be capable of proper management, taking account of and addressing existing defects, not just addressing cumulative or new impacts arising from the new increase in capacity. In short, the applicant needs to show that they can manage the impacts of 18,000 capacity better than they currently manage impacts of 14,500.

Traffic: Traffic survey data presented is either over five years old from 2017 (preceding extensive changes to the road network in the centre of Bath), or was surveyed in April 2022 when Cleveland Bridge was partly closed. Cleveland Bridge was closed from late June to October 2021 followed by partial closure with shuttle working from then until October 2022, with many drivers finding alternative routes to avoid the area and traffic flows in eastern and central Bath significantly impacted. This means April 2022 traffic surveys are not representative of 'normal' conditions. The datasets, taken individually or in combination, are not an appropriate basis on which to make

predictions about traffic impacts of the development, and the attempt to draw conclusions by comparing the two datasets is flawed. Furthermore, there are many other errors and omissions of which the following are merely included by way of illustration:

- For example, Lower Sydney Place and Darlington Street do not appear to have been surveyed, although this is the location where traffic from A36 Warminster Road and A4 London Road/Bathwick Street converges. Lansdown Road, a key route into Bath from the M4, has not apparently been considered in spite of its important status as a route to car parking in central Bath. (It is assumed that the reference in Transport Assessment Section 5.2.2 to “A36 Great Pulteney Road” is to “A36 Pulteney Road” rather than to “Great Pulteney Street”.)
- Junction counts from 2017 at two junctions (Transport Assessment para 5.2.11 and 12) and 2018 at two other junctions (paras 5.2.13 and 14) are not representative of current conditions. Changes since 2018 are essentially dismissed in para 5.2.15 without acknowledging the extensive nature of the wide-ranging parking changes, and without reference to the dramatic impact of Cleveland Bridge partial closure on the 2022 survey data, which para 5.2.15 then proceeds to compare with the 2017 data to assert “2023 Existing Flows”. A much more systematic, rigorous and fully disclosed approach is required for determining baseline existing flows. This should be required before any evaluation is attempted by B&NES officers.
- Additionally, junction counts are mentioned in section 5.2 only for a small number of selected junctions, omitting many key junctions across Bath’s road network.
- Data referred to in paras 5.2.8 to 10 is 10 years old (2012 to 2014) and clearly has no relevance to current venue capacity or current Bath road network.
- The Observations of Highway Network Operation (TA 5.3.1 to 10 and corresponding Appendices) once again refer to datasets over six years old and lack key information as to whether the Appendices eg the Google Traffic Speed Plots and average journey speeds were of similar age. In addition, speed limits on and around several roads and junctions referred to were changed to 20mph in 2021, although this seems in conflict with some of the Figures and Appendices. This is in addition to all the differences in road network, parking arrangements etc already mentioned.

The above-mentioned inconsistencies, errors and omissions are merely illustrative of many more that appear throughout the Transport Assessment, which requires extensive revision, and rectification of omissions and errors before baseline conditions can be understood. These failings and the consequential lack of clarity of baseline conditions mean that the modelling and predictions based thereon are unreliable.

Parking: The Council has in recent years taken active steps to reduce parking capacity, especially in the inner city, in order to reduce congestion and air pollution and to encourage active travel. The application does not reflect recent and planned reductions in City Centre car park capacity, nor reductions in on-road free or pay and display parking (including parking rules affecting Sunday parking on single yellow lines), and does not take account of recent changes in RPZs, which include extension to Sundays and implementation of new RPZs including Walcot/Snow Hill and Oldfield Park/Westmoreland. This means the proposals are presented against an incorrect parking baseline. The proposals should not rely on on-street parking – they should include measures ensuring car use is greatly reduced.

Pedestrian access/crowd control: Current matchday pedestrian routes are hazardous in various places, with pedestrian congestion on the narrow and steep staircases at Pulteney Bridge (pinch point 1m) and at North Parade Bridge (both of which serve two-way pedestrian movement), in the Spring Gardens Road tunnel, and on Pulteney Bridge and North Parade Bridge. Pulteney Bridge, in particular, receives significant non-match pedestrian traffic (residents, visitors to the city and tourists) who are overwhelmed by match attendees moving in the opposite direction. The application does not adequately consider non-rugby events, different in respect of times, durations, travel modes, which may result in impacts being higher even if attendance is lower.

Bath Rugby survey: It is said that a survey was carried out in April 2022, but insufficient information is provided about the nature of the survey, demographic of participants, whether away supporters included, number of participants (only percentages being stated). A comprehensive set of data giving details of methodology and with actual respondent numbers is needed to enable evaluation.

Wider Road Network: Has consideration been given to impacts on trunk roads and relevant roads in Wiltshire and South Gloucestershire? These seem important baseline considerations.

Impacts of proposed future uses.

Proper evaluation of the travel and access impacts of proposed future usages is hampered both by the absence of evidenced well-defined baselines (see above) and by the absence of clear, consistent and adequately detailed description of proposed future activities. The following are of particular relevance to residents in Bath:

Cumulative vehicle Journey numbers: This is an area in which the extensive inconsistencies and omissions in the application documents are a major obstacle to evaluation of impacts. By way of example:

- The Planning Application does not quantify the cumulative number and additional impact of Operational Phase spectator numbers and car journeys into central Bath. It merely provides unvalidated estimates of baseline and current numbers and incomplete and potentially understated future numbers.
- The Bath Rugby Travel Plan (BRTP) based on average 2022/23 attendance of 13k aspires to a zero increase in car journeys and an aspirational 2027 reduction in car and passenger/drop-off transport modes mode from c 30% to 25%. **But this conflicts with data and predictions in the application.**
- The BRTP describes potential alternatives, mainly based on increased volume and use of Park and Ride services **with no hard proposals/commitments** as to how to incentivise changes in travel behaviours or to fund and control the alternatives.
- The limited Planning Application data already shows **there will be a more than doubling of cumulative car journeys into central Bath on match/major event days** which is not in keeping with BANES net zero policy and transport carbon reduction objectives.
- The cumulative car journey increase of well over 100% does not include for Operational Phase any projected volumes of Sky Bar and other non-Conference users which will be occurring 365 days a year.

- Conference visitor projections are included but seem implausibly conservative: just 11,800 visitors a year with the Conference facilities only in use 77 days a year (21%) and only two full capacity conferences are projected.

Parking: Once again, errors and omissions relating to existing parking provision gives a misleading impression of the parking baseline, but notwithstanding these defects, it can be deduced from the information in the application that parking will also be a major issue. Based on 2022/23 average attendance of 13k all central carparks are at full capacity on first-team matchdays. The Transport Assessment's predicted Operational Phase volumes show that over 1000 car drivers will be seeking to but unable to park in central carparks every first-team matchday. Taking account of extensions to Resident Parking Zone areas and other reductions in on-road parking in Bath, the applicant should not be assuming any on-road parking within walking distance.

Park & Rides: The data provided in the application is unconvincing. The application suggests increased P&R use will happen but once again the measures to support this are absent. In the absence of an Eastern Park & Ride the applicant needs to provide plausible explanation as to how traffic entering from the East will get to Park & Ride sites, and how this will be compatible with existing congestion on London Road. With regard to routes from the East, the data from a 2022 Traffic Survey and Bath Rugby's Travel Survey in April 2022 are likely to be significantly underestimated due to Cleveland Bridge restrictions at that time.

On-road parking: It is unacceptable for residential areas to be used as a "car park" or "drop-off" for those attending events at the venue. The planning application should include measures that prevent this. In any case, the expansion of Residents' Parking Zones across the City will make street parking increasingly difficult. Coaches bringing supporters or participants to events should be required to use the North Parade Road entrance, or to use the B&NES drop-off coach bays on Pulteney Road

Need to reduce overall car use: The applicant should be aiming to reduce overall car use (rather than simply redirecting) and provide additional non-car travel opportunities. In the case of rugby events this requires Bath Rugby to take a more proactive approach so that car drivers switch to alternative modes to car, eg coaches organised by the club, public transport, more cycle parking, better financial incentives etc rather than suggesting that the proportional increase in drivers should be managed.

Non-rugby events: Assessment of non-rugby events is superficial and insufficient for meaningful evaluation. These will differ from rugby events in respect of times, durations, travel modes, radius of journey origin, so even though attendance may be smaller, impacts may be higher. A fuller analysis of the likely impacts of non-rugby events should be required PRIOR to any consent being granted.

Impact on the road system: The traffic impact on many key junctions within Bath, and the impacts of diverting traffic to the P&Rs is not considered – for example, consideration of extra traffic from the A4 east passing through the city centre to get to P&R sites. This requires consideration of many junctions over and above those for which junction counts are provided in Transport Assessment section 5.2. The focus should above all be on reducing car use. Any car drivers from outside Bath should preferentially be directed to P&Rs without entering Bath.

Travel Plans: The applicant has provided a draft Travel Plan limited to Bath Rugby events only, which has little relevance to other events proposed that will be of different type, times, durations, travel patterns etc. The applicant suggests Travel Plans for non-rugby events would be deferred for consideration on an event-by-event basis. This is unacceptable, especially in light of the constrained location and access routes, sensitive setting, and close proximity to residential areas and the city

centre. It also places an unnecessary burden on B&NES who should not be required to consider a Travel Plan *ab initio* for each event. A Travel Plan should be provided defining a framework for travel for non-rugby events, and this needs to be included **within the main application in order to allow proper public scrutiny and consultation.**

Cycling: Proposed cycle parking is too low. Compare to the 2022 Travel Survey results – will the number of cycle spaces cater for the existing demand (with proportional increase in stadium capacity) without impacting on other city centre provision? The target in the Travel Plan is to increase cycling to 2% with an 18k crowd equating to 360 cycle spaces (180 Sheffield stands). Only 48 spaces / 24 stands are currently proposed. How will cycle parking be expanded if demand requires – this is not addressed in the Transport Assessment? We note that our concerns are corroborated by the consultation comments dated 19 October 2023 from Active Travel England, who have pointed out many other deficiencies in proposals and omissions in the information provided.

Travel management and planning: This should involve a steering group on which local residents should be represented. FoBRA fully supports the suggestion that there should be a representative nominated by Pulteney Estate Residents' Association.

Construction Management Plan

This is a large construction project, of long duration, on a complex site with many constraints on access to the site and wider access routes, which are key arterial routes of the city. In these circumstances, deferral of preparation of a Construction Management Plan as the applicant proposed in Appendix TA-15 is inappropriate. It is essential a full Construction Management Plan be submitted and considered within the main application, not merely as a Condition. This should include all relevant arrangements and mitigations, including the measures set out in our Objection of 23 October 2023.

Concluding remarks

The proposed development including substantially increased event use and a range of substantial commercial spaces proposed for use on non-event days as well as event days is likely to impact significantly on local highways and pedestrian access routes. The constrained nature of the site and access, the constrained nature of Bath's road system, the extremely close proximity to a residential area, the potential deterrence effect of additional car journeys on active travel within the city, and the sensitivity of the fabric of heritage buildings that line key access routes make it especially important that the traffic impacts are properly evaluated.

This requires the applicant to provide correct, coherent and complete information regarding the baselines against which the impact of the scheme is to be evaluated, and about the proposed usages. It also requires the applicant to put forward serious proposals for materially reducing car use and pushing all additional car traffic to Park & Rides.

Consent should not be granted until the concerns raised concerning the traffic impacts from the scheme and the analyses on which they are based have been fully addressed and appropriate measures agreed in order to ensure effective mitigation.

FoBRA Committee & Transport Group

31 October 2023