

12th October 2017

Councillor Tim Warren
Leader of B&NES Council
The Guildhall
Bath
BA1 5EB

Dear Councillor Tim,

BATH TRANSPORT ISSUES

1. A number of transport issues of great importance for Bath are coming to a head with the current consultations on air quality, parking and coaches. FoBRA has responded in detail to each of these, but I would like to give you our overall view.
2. Traffic congestion and air pollution have consistently been the top concerns of FoBRA members. Air pollution is above the legal limit throughout the road network in Bath, and it has not improved over the past 10 or more years. These levels of air pollution are known to have serious health effects, including early deaths (perhaps 30 a year in Bath). Some 10,000 people live within the current Bath Air Quality Management Area.
3. All B&NES' 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. 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.

Bath Air Quality Action Plan (AQAP)

4. The facts that the Government has listed B&NES among the most polluted authorities in the country, and that B&NES is now required by the Government to develop and implement a plan to reduce pollution below the legal limit in the shortest possible time, provide an excellent opportunity for B&NES to take forward measures to reduce traffic and pollution; and overcome the constraints that have impeded action in the past.

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5. 92% of air pollution in Bath is caused by traffic. Action must therefore be focused on reducing traffic volumes, particularly the most polluting diesel vehicles. The new consultation paper is a step forward from the 2011 AQAP, as it does now address traffic reduction measures, most of them based on the Bath Transport Strategy which was agreed with all-party support in 2014. However, unless B&NES Council actually implements these measures, nothing will change; and the Council will fail to meet the objective set by the Government to 'develop and implement a plan designed to deliver compliance in the shortest time possible'. The measures in the draft AQAP must have specific timescales attached to them, and these should be incorporated into a comprehensive transport plan.

Parking

6. We have long been urging B&NES Council to reduce traffic congestion and air pollution by means of traffic management and reduced visitor parking in the city centre. Both are part of the Bath Transport Strategy. We broadly welcome the parking strategy, including its recognition of the need "to reduce the level of intrusion of vehicles into urban centres, reflecting concerns about the impact of traffic congestion on the environment and air quality, as well as the need to protect the historic fabric of the World Heritage Site in Bath".

7. We welcome the Hierarchy of Kerb Space, which places resident parking above short-stay parking and long-stay parking. However, the Hierarchy is not being followed in the Central Controlled Parking Zone (CPZ), where residents have almost no priority despite this being the most densely residential part of the city. On-street parking in the central area should be reserved mainly for residents and other essential users listed in the Hierarchy, such as the disabled. This would also contribute significantly to the reduction of congestion and air pollution, as it would deter visitors from driving round and round looking for a space.

Coaches

8. By contrast, the coach parking strategy is totally flawed. It fails to recognise the severe adverse impact of coach traffic on the city, to analyse the contribution that coaches are claimed to make to the economy, or to 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. Surveys were conducted of the views of coach companies, drivers and passengers, but none of Bath residents. In the view of many residents (and some businesses), coaches are a plague.

9. The strategy proposes that coaches should continue 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. Coach demand is forecast to increase by 24% by 2026, but the strategy seems to suggest that this increase is simply to be accommodated. These proposals are completely incompatible with Council's policies to cut air pollution and reduce traffic, especially

in the historic core, and a wasted opportunity to improve our city. Coach drop-offs should be provided at locations outside the city centre, within a reasonable walking distance of it. We do welcome the creation of a coach park at Odd Down.

10. The proposal to put four to six new coach bays on Green Park Road is particularly egregious. It would gobble up a valuable green space and ruin the riverside setting of Green Park, which is used by young children including a growing number of visiting school groups.

11. The strategy should be widened to cover all aspects of the presence of coaches in Bath, including illegal parking, engines left running, and the movement of coaches through the historic core of the city. Restrictions should be placed on the streets that can be used by coaches within this area, such as High Street. The coach ban currently in force in Brock Street should be extended to Bennet Street and Gay Street. Coaches are not generally permitted to come into the historic core of York, an excellent model for Bath.

12. We strongly urge you to reject the draft Coach strategy and direct that a revised one is prepared which is consistent with the traffic reduction aims of the Core Strategy, PMP, Transport Strategy and the PRMS, and with the requirement which has been placed on the Council to bring air pollution inside the legal limit as soon as possible. Coaches must be managed, not simply accommodated.

Conclusion

13. Finally, FoBRA would like to congratulate you on bringing together these three strategies, each important as pieces of the jigsaw which together constitutes the overall Transport Policy for Bath; and all indicative of accelerating, and much needed, progress. However, modifications are needed, especially in the Coach Strategy, and, at risk of repeating myself, nothing will happen without actual implementation. I shall be posting this letter on FoBRA's website and, if I'm lucky, it might appear in next week's Bath Chronicle!

Yours sincerely,

Robin Kerr, Chairman

CC: Cllr Mark Shelford, Cabinet Member for Transport