

## Federation of Bath Residents' Associations (FOBRA)

### Response to B&NES consultation on Parking Strategy

1. Our comments relate to parking in Bath, and to the Objectives and Actions set out in the Technical Report.
2. We welcome this comprehensive study of parking issues in Bath, and the extensive data provided. While noting that many detailed issues are left for further study, we welcome the 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".
3. At several points the paper speaks of reducing the *growth* of traffic in Bath and ensuring *no increase* in air pollution. In fact, air pollution is already well over the legal limit across the city and must be reduced. Traffic volumes must be reduced to achieve this and to meet the wider objectives sets out in B&NES's Core Strategy, Placemaking Plan, Bath Transport Strategy and Public Realm and Movement Programme.

### Section 1.2 Aims and Principles

3. We welcome also the recognition of the place of parking strategy within the hierarchy of B&NES plans, ie:



4. All the higher level B&NES 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. 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*. This can only be achieved by reducing traffic in the city.

5. The overarching aim of the parking strategy should be to support these B&NES policies. The first principle of the strategy (Section 1.2, page 2) should be revised as follows:

"To sustain and enhance the vitality and viability of settlements within Bath and North East Somerset, including the City of Bath, through parking policies which reduce traffic in congested areas and improve air quality, and support the prosperity of the city and towns".

The aim should be to *reduce traffic* in congested areas, not just reduce the further *growth* of traffic. Reducing traffic and pollution will contribute to the vitality and viability of Bath, not detract from it. These objectives are not in conflict, as the many historic cities in Europe that have removed traffic from their centres have shown.

## **Section 3 Parking Standards**

6. As the Parking Strategy adopts the parking standards presented in the PMP, little comment is required. FOBRA urged that the PMP should include different, stricter, parking standards applicable to areas close to the city centre, particularly in the EA, rather than a single standard outside the centre. We are also concerned about the proposal to 'flex' standards (an odd sort of standard, if they can be varied). Relaxing parking standards where on-street parking is limited would add to the supply of parking, contrary to the Bath Transport Strategy principle of using parking control limit traffic.

## **Section 4 On-Street Parking**

### **4.2 Hierarchy of Kerb Space**

We welcome the Hierarchy of Kerb Space, which places resident parking above short-stay parking and long-stay parking (in that order).

**Objective PSO6** We strongly support this objective, under which the Hierarchy of Kerb Space will be used to determine the allocation of on street parking space. However 'maintaining free flow of traffic' should not take priority over public realm, residential amenity and the needs of residents.

This Hierarchy is not being followed at present in the Central CPZ, where residents have almost no priority despite this being the most densely residential part of the city. About 90% of bays are 'dual-use' (compared with between 50% and 100% in other CPZs) and residents are in constant competition for kerb space with short-stay and long-stay visitors. Residents have consistently expressed their concern about the difficulty of parking at most times of the day and week.

FOBRA believes that on-street parking in the Central Zone 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.

This would in fact displace only a small number of visitors. Most of the spaces in the Central CPZ are permanently taken by residents. Based on the Council's parking meter revenue data, on average only about 70 on-street spaces in the whole Central Zone are occupied by Pay and Display parking.

#### **4.3.1 Controlled Parking Zones**

Figure 3.1 (taken from the Core Strategy) defines Bath City Centre for the purpose of parking policy. It is essentially the commercial and civic heart of Bath. However, lumped in with the city centre in the Central CPZ is an almost entirely residential area (Lower Lansdown) immediately to the north. This is a historical anomaly resulting from the fact that this was the original Bath CPZ created in the 1970s where parking pressures were highest.

Lower Lansdown is almost identical to Zone 1 in most respects, such as the distance from the centre (Zone 1 actually overlaps the city centre), and the small amount of businesses in the area. B&NES should recognise in its parking policy the residential character of Lower Lansdown (which is confirmed in the Bath City-wide Character Appraisal SPD), and

introduce fair and equitable parking arrangements for residents of the area including access to resident visitor permits as is the case in all the other residential parking zones.

**Objective PSO 7** What is meant by the 'central area' or 'centre' of Bath? Does this objective relate to the city centre as defined in Figure 3.1, where there is currently almost no long-stay on-street parking, or to a wider area surrounding the city centre? If the latter, it should be defined. We trust that there is no intention to limit resident visitor permits, which are an important facility for residents, used for a mix of short- and long-term parking, and limited in number.

**Action PSA 2** We support a review the hours of operation of resident parking zones. In the Central CPZ and Zone 1, parking pressures are as high on Sundays as other days and early consideration should be given to extending parking control to 7 days a week.

**Action PSA 3** Strongly supported. Permits for hotels, guest houses, etc have long been a contentious issue in Zone 1. They were introduced in the Central CPZ without consultation some 6 years ago and have added greatly to the pressures on kerb space. By definition, these permits are used for long-stay parking and so belong at the bottom of the Hierarchy of Kerb Space. Unlike resident visitor permits, these permits are available for an unlimited number of days throughout the year. They should be discontinued and hotel etc visitors directed to off-street parking or P&R.

## **Section 5 Public Off Street Parking**

### **5.1 Introduction and Objectives**

We welcome the clear statement that off-street parking plays a pivotal role in managing traffic levels and reducing the harmful impacts of traffic.

However it is totally inadequate to plan on the basis of a "need to restrict the *growth* of traffic in the city centre to ensure that, as a minimum, congestion and air quality impacts are *not increased* from their current levels". Air pollution is already over the legal limit across the city and must be reduced. Traffic volumes must be reduced to achieve this and to meet the wider objectives sets out in the Core Strategy, PMP, Transport Strategy and Public Realm and Movement Programme.

**Objective PSO 10** FOBRA believes that public off-street parking should be reduced, as set out in the Bath Transport Strategy.

**Objective PSO 11** Supported. P&R should be expanded as necessary to enable good access to the city centre. Reducing parking in the centre may increase parking pressures in outer residential areas and hence calls for parking control in those areas.

**Objective PSO 12** We would be concerned if the policy was simply to encourage short-stay parking in place of long-stay parking, since that would mean more car journeys into the city. So long as the change was introduced as part of a package which removed most on-street visitor parking from the centre, it would be reasonable. In other words, parking would be moved from on-street to off-street, and from off-street to P&R. However, it should be borne in mind that on average there are only some 70 on-street spaces in the Central CPZ occupied by visitors, so this would not warrant any growth in overall off-street capacity.

**Objective PSO 13** We believe that a *maximum* of 500 spaces should be retained, as envisaged in the Bath Transport Strategy.

### **5.3 Park and Ride**

**Action PSA 11** Supported. FOBRA believes that:

- The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. There should be a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses, perhaps paid for by the accommodation sector or a broader tourism grouping. Currently hotels are under construction in Bath which offer no parking facilities for guests. The Council should take steps to prevent overnight parking by hotel guests on nearby residential streets.
- More attractive pricing arrangements should be considered eg. parking fees rather than bus fares. For 4 people in a car it is cheaper to drive in to Bath and park than to use the P&R. Pricing should incentivise overnight P&R use when it is introduced.
- Use of P&Rs could be further diversified and expanded, as is done elsewhere in England. They could be used to help in reducing congestion caused by school children deliveries, and for delivery of purchases from city centre shops (as in Cambridge). They could be used for coach parking (already planned at Odd Down) and for coach drop-off and pick-up, with visitors taking P&R buses into the city.

**Objective PSO 16** Supported. As parking and traffic in the city centre is restricted and the Enterprise Area is developed, the arrangements for access from the east of Bath, including P&R, may need to be revisited.

### **Section 7 Parking charges**

**Objective PSO 20** Generally supported, but see comment on PSO 12 above. Pricing should also encourage overnight hotel etc guests to use off-street parking, particularly until secure overnight parking is provided at the P&R.

**Objective PSO 22** Support.

### **Section 8**

**8.7 Coaches** We are responding separately to the consultation on coach parking strategy, which is seriously flawed as it permits large numbers of coaches to continue to access the city centre, contrary to B&NES's policy objective to reduce traffic and air pollution in Bath.

### **8.9 Goods Vehicles**

**Objective PSO 30** Support. Deliveries are necessary but have a detrimental effect on the amenity of the city. Better management is required to reduce their impact.

We strongly support the creation of a freight distribution depot operating close to the city centre with a fleet of small electric trucks (on the Gothenburg model) or even micro-deliveries using electric bikes. This would offer great flexibility and more frequent deliveries than the trial scheme, and would be an altogether more attractive proposition for city businesses, particularly when delivery windows are introduced.

**Section 9, Objective PSO 31** We support the rigorous enforcement of parking regulations.

### **Section 10 Major Events**

The Council should actively manage demand and not simply seek to accommodate it.

Events likely to generate excessive demand should be deconflicted if possible (**PSA 20**).

The Christmas Market imposes severe pressure on parking in the city. It is almost the only time during the year when all the car parks and the P&Rs are full, and the predictable result is that the city becomes severely congested. B&NES Council should consider whether it is in the overall interest of the city and its residents to allow the Christmas Market to continue on its present scale. It should not permit the market to be expanded in scale or duration.

We support the actions in this Section.

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