



Bath Heritage Watchdog

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FOR:

Transportation Planning

SUBJECT:

East of Bath Park And Ride Consultation

Bath Heritage Watchdog offers the following response to this consultation

Opinion on the Consultation

- The on-line response form is wholly inadequate. It reduces what should be a reasoned survey into a simplified box-ticking approach. Not only that, but there is no option for a “None of the above” indication. That is why this response is in part a submission of a reasoned review of the options, and in part a complaint that the on-line method of reply is both inadequate and biased.
- None of the documentation has addressed the recommendation in the exhibition panels “**That further work is required to establish the need for increased Park and Ride capacity**”. All the supporting documentation is from 2013, and since those reports were written, some 5,000 MOD jobs have been exported to North Bristol. A large number of these civil servants lived in Box, Corsham, Holt, Atworth and other locations around, because the property prices were so much lower than in Bath and therefore it was economic to commute. Had they continued to work in Bath, they might have used a Park and Ride facility, but they no longer work in Bath. Furthermore, a substantial number of employment locations in Bath have been redeveloped as housing or student accommodation, so there are fewer non-MOD employees too. A proper assessment of demand has not been done. The Core Strategy suggests that jobs will be created by building offices, but developers have established that there is no demand for office accommodation in Bath and are building hotels and student accommodation instead, neither of which would require Park and Ride parking; and there is over two million square feet of empty and unwanted recently built office space in Bristol too; so the Core Strategy assumption looks speculative and unlikely. The need for the number of parking places assumed seems to be no longer there.
- The assumption has been made that all of the east of Bath usage can be accommodated in a single facility. The potential users might approach from the M4, from the A46 north of the motorway, and from the A420 east of the A46 and thus arrive to the west of all of the suggested sites, requiring them to drive east to all of the offered locations to get a bus west into Bath. Other users may arrive from the A4 having started from Corsham, Box, Melksham, Devizes or perhaps Trowbridge. Consideration should have been given to treating these two user groups separately: the A46 and motorway traffic using Charmy Down and the A4 traffic using the brownfield land just to the East of the Northey Arms. Behind the Northey Arms is the

remains of a railway halt, so a Park and Rail possibility would be available there. The roads from these locations to the Batheaston Bypass are relatively uncongested, so the additional distance would not add significantly to the journey times.

- Considerable emphasis has been placed on the potential for the Metro West rail service. We understand from Network Rail that they believe it will have an adverse impact on existing scheduled services and that they will veto the scheme (if they haven't done so already).

All the above indicate that without proper current evidence, the requirement for this Park and Ride cannot be argued.

Heritage Issues

All three sites proposed are clearly visible from popular viewpoints on the Bath Skyline Walk and also from Little Solsbury Hill and Brown's Folly, both of which are Scheduled Ancient Monuments. As these are elevated viewpoints, no landscaping scheme will conceal reflections of the sun from windscreens and car roofs. Such reflections, even from a distance, ruin the natural contrast calculations of modern digital cameras and give wrongly exposed photographs. There is nothing photogenic about parked cars on an overcast day either. Views into and out of the World Heritage Site will be harmed.

This is directly contrary to the wishes of the decision of the World Heritage Committee. In their Decision 33 COM 7B.131 it states at point 7:

“7. Also recommends that the State Party enhance the protection of the surrounding landscape of the property to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property”.

This decision was issued at the time when the Bath Transport Package was being lodged as planning applications, and just after the UNESCO Mission to Bath had reported back, so the Park and Ride plans will have been considered by the Committee and the resurrection of Batheaston as a Park and Ride location will clearly be material to the World Heritage Committee. During our meeting with the UNESCO Mission it was confirmed that UNESCO regard the Green Belt and AONB protection around Bath as the de facto alternative to the usual World Heritage Buffer Zone, and this location must be treated accordingly. B&NES has an adopted Supplementary Planning Document which recognises the consultation locations as part of the setting of the World Heritage Site, which has its boundary just 150 metres away from Site F, the furthest of the suggested sites. ICOMOS UK as UNESCO's agents in Britain must be given the opportunity to examine and comment on the consultation.

All three sites impact directly on the Cotswold Area Of Outstanding Natural Beauty. No doubt the Cotswolds Conservation Board will have objected on that basis if the consultation had been brought to their attention. The NPPF requires that “great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”. The superseded PPS7 gave more details of why this policy was established, and can be regarded as an archive of the contributory thought processes. Retained Local Policy NE2 seeks to protect not only the AONB but also the natural beauty of the landscape outside it, and is quite definitive, ruling that all three sites fall into the category that they “will not be permitted”.

The nearby Hampton Rocks is a Site of Special Scientific Interest and therefore has statutory protection. It is also a Site of Nature Conservation Interest. The nearby River Avon and K&A Canal are both SNCIs too. SNCIs do not have legislative protection but they do have

the protection of retained Local Policy NE9, and that policy would not allow the presumption to refuse to be overridden without compensatory provision of at least equal nature conservation value. None is identified in the consultation documentation.

Because Site B is designed to be accessed via a road through Site F, then identifying these two as entirely separate schemes is disingenuous. The consultation is really a choice between “Site A” or “Site F” or “Site B and F together” as far as the impact on views and on the setting of the World Heritage Site is concerned. The current EU legislation requires new vehicles to drive with lights permanently on, so all moving vehicles within the car park or on the approaches will attract visual attention.

Environmental Issues

The exhibition panels show an objective of “To reduce carbon emissions from transport”. Whilst there is value in such an objective, the EU's focus has moved away from carbon dioxide as a problem emission and on to nitrogen dioxide and nitrous oxide and carbon particulates. Carbon particulates are now regulated by EU directives, but nitrogen dioxide is an inevitable by-product of diesel fuel and there is no mechanism to control it. That is why Government attention is currently directed towards discouraging diesel engined cars.

Nitrogen dioxide is harmful to health and the source of acid rain which is harmful to plant life (and limestone such as Bath stone). Carbon particulates are harmful to the human lungs. Diesel engines generate lower levels of carbon dioxide than petrol engines, but very much higher levels of nitrogen dioxide. Diesel engined cars have been required by law to fit particulate filters some 10 years before commercial vehicles were similarly regulated. The environmental impact of encouraging petrol engined cars to park so that the journey can be completed by diesel engined buses (which have far greater amounts of nitrogen dioxide and residual particulates than even diesel engined cars do) has not been evaluated. Nor has the potential for diesel emissions to create acid rain which can harm Bath stone been considered.

The assumption has been made in the exhibition material that the bus lane on the London Road will ensure the free passage of the Park and Ride buses. We have members who travel to the east of Bath by bus on a regular basis, and they report that just deciding on a car park location is not going to solve the existing traffic problems, and that a complete review of the route a Park and Ride bus would take is also necessary. Firstly, at peak times there is a long queue of traffic waiting to leave the bypass at the Lambridge roundabout, and the Park and Ride buses will initially join this queue. Then at a number of points, the London Road is too narrow for a bus using the bus lane to get past a large lorry in the traffic lane alongside, so the progress of the bus, and any behind it, is dictated by the progress of the lorry. Nowadays the progress of the lorry is nowhere near as efficient as in the past when there was an almost permanent filter arrow at Cleveland Place and a mini roundabout at the Warminster Road junction allowing a continuous trickle of traffic instead of the queues that build up behind the replacement red traffic lights. Also, before the inadequately thought out bus lane was created, the lorry would have been making continuous slow progress in the inside lane clearing a path for the bus rather than stopping the bus from moving as it currently does. Even when the road would have been wide enough for a bus to make good progress, the introduction of a cycle lane and build-outs reduce the usable road surface to a single lane. At peak times, many drivers would judge that they would make better progress in a small car than by sitting on a Park and Ride bus. Such judgements will make the use of Park and Ride facilities by commuters an unattractive option, and if it does, then the number of parking places suggested as being needed might be a significant over-provision.

It follows that an east of Bath Park and Ride scheme, wherever the car parking is located, cannot succeed in isolation. Any Park and Ride scheme east of Bath must either succeed in

re-routing lorries away from the London Road or it needs to restore the continuous left turn filter at Cleveland Place and restore the mini roundabout at the Warminster Road junction to improve flow and traffic throughput.

Studies elsewhere have shown that if a Park and Ride arrangement frees up road capacity, that additional capacity is soon eroded by latent demand previously taking more indirect routes. It must be assumed therefore that regardless of how many parking spaces are installed, it will not significantly reduce the London Road traffic levels, it will just add more buses to the mix.

Ecology Issues

When the Batheaston Bypass was constructed, the area occupied by Site B and Site F was specifically set aside as an open wetland area. Although it does not happen frequently it does flood, and there are photographs on the internet of it flooded. Site A has also flooded in the past. Generally, all are just damp ground, and because they have remained undisturbed the area has become a well-populated biodiversity location.

It is therefore an essential feeding location for the Greater Horseshoe Bat. This is a rare species which does not inhabit the meadows, but it does feed there, especially hunting beetles and moths at all stages in their life cycles. The Greater Horseshoe Bat is unusual in that it does not hibernate, and therefore it relies on finding food throughout the winter, a time when food is harder to find and foraging areas expand accordingly. Because it is a threatened species, not only must their roosts be protected, but also their prey populations. The recommended range of prey site protection is any area within 4 kilometres of roost sites. This radius rules out all three of the proposed sites, because they are currently established meadow land harbouring prey.

Retained Policy NE.10: “Development that would adversely affect, directly or indirectly, species which are internationally or nationally protected or the habitat of such species will not be permitted”, a policy which is supported by several NPPF paragraphs, rules out all three suggested sites.

Aside from the wildlife issues, car parking requires a firm surface, and no matter how permeable that surface is, it will not take up as much water as grassland does, so the potential for flooding after abnormal rain events will be significantly higher. Cars are not environmentally clean either. Oil splatters, brake dust, windscreen washing chemicals, lock de-icers and litter will be collected by rain and washed to areas outside the parking area, which hitherto have not suffered such pollutants. The number of quoted vehicle movements rules out these sites, incompatible with a Green Belt according to Circular 11/2005.

The third pollutant will be light spill. In winter, rush hours occur in the dark. The car park will require illumination for the safety of drivers walking to and from the buses, the cars will arrive and depart with their light on. The access roads will require illumination for the “park and cycle” users. As many creatures are accustomed to the meadows being dark spaces where they can forage at dusk, their lifestyle will be disrupted. If the examples of Lansdown and Odd Down (despite promises to the contrary) are repeated here, the lights will remain on all night.

The absence of street lighting in this area makes it a popular location for amateur astronomers who escape the city lights for a better view of the dark sky. The British Astronomical Association objected to the previous planning application for Site F as being contrary to their Campaign for Dark Skies due to the impact of the lighting, and because dark skies are a key feature of this part of the AONB. The Association should have been invited to comment on the consultation.

Conclusions

- None of the facts and figures are sufficiently up to date to be capable of justifying going ahead without fresh research.
- None of the impacts on flood risk, ecology or environment have been properly considered.
- None of the impacts on SSSIs, SNCIs, AONB and Green Belt have been taken into account.
- No heed has been paid to the NPPF, the Core Strategy and its retained Local Policies.
- No account has been taken nor assessments made of the latest EU pollution targets.
- The options considered, of which the three locations being consulted form the short-list, did not explore enough possibilities.
- The impact on the World Heritage Site and its surrounding landscape have not been adequately considered, despite the State Party having been explicitly asked to do so.
- None of the sites offered in this consultation stand up to the above scrutiny.

As a result, the proposals offered for consultation are fatally flawed.