

Additional Representations by Federation of Bath Residents' Associations (FoBRA)

1. Policy ST1 – Paragraphs 619, 582, 583, 583a of the Local Plan Partial Update

Eastern Park & ride

The objective of the LPPU is updating particulate policies to address changes since the Core Strategy was adopted in 2014 and **“particularly the Council’s Declaration of a Climate Emergency and Ecological Emergency”**.

The LPPU proposes removal of a policy of looking for an Eastern Park & Ride site. The previous proposal was designed to increase sustainable travel and thereby to provide favourable impact in terms of the above-stated LPPU objective. Its removal appears contrary to compliance and soundness **unless** the sustainability improvements lost by its deletion are outweighed by other measures.

The East of Bath and the Eastern approach corridor is the source of substantial traffic into and across Bath, including commuter traffic and traffic to the Royal United Hospital (Western Bath) and other facilities around the city (including City Centre facilities, schools, the two Universities etc). Amended paragraph 619 asserts *“Data shows that many trips into Bath originate in the East and some motorists choose to use the facilities at Odd Down and Lansdown in the absence of a facility to the East.”* That statement is vague and unsubstantiated, but a mere look at a map shows that the vast majority of the hinterland in the East is not easily or reasonably drivable to Odd Down or Lansdown either (i) for reasons of geography such as location and unavailability of river crossings or (ii) feasible routes being limited and requiring driving across the city, thus defeating the point of using a Park & Ride. It does not justify removal of the previous policy.

The LPPU does **not** propose replacing the plan for an Eastern Park & Ride by other measures in Eastern Bath or the Eastern Corridor to match the impact that an Eastern Park & Ride would have had. On the contrary:

- Parking allowances (removed from the Local Plan into a Supplementary Planning Document) allow for increased parking levels in settlements to the East, which will tend to increase car traffic into Bath.
- The previously included statement of intent to address the problem of through traffic passing through the World Heritage Site is proposed to be removed.
- No new policies have been introduced to improve public transport along the Eastern corridor/A4East and no policy provision is included for safe segregated cycle infrastructure along the A4E, a road on which cyclists are in many parts in mixed traffic including hundreds of HGVs per day.

Summary: The removal of the policy for an Eastern Park & Ride fails to reflect the LPPU objectives and is not legally compliant and sound.

2. Policy ST1 – Paragraph 589f of LPPU

Clean Air Zone

Paragraph 589f of the LPPU is new and states:

*“Specifically, Bath’s Clean Air Plan includes a Class C Clean Air Zone (CAZ), which came into effect in March 2021. The CAZ is required to help the city meet UK air quality legislation, as several places in Bath currently exceed the legal limits for Nitrogen Dioxide pollution, which is mainly caused by diesel and older petrol vehicles. The CAZ will charge all higher emissions vehicles, except private cars and motorcycles, to drive in Bath’s City Centre. Its aim is to deter the majority of drivers of higher emissions vehicles from entering the inner city area. **It is accompanied by traffic management in Queen’s Square, to provide the necessary additional localised measure to reduce emissions to acceptable level without charging private vehicles.**”* [Emphasis added]

We submit that paragraph 589f insofar as it contains the capitalised sentence is not legally compliant and sound. The “traffic management” arrangement referred was designed to allow reduction of Class D CAZ to Class C, and in that context is inextricably linked to a stated requirement to monitor the impact of the traffic management and mitigate adverse impacts. See the attached Peer Review dated 27 August 2019, 2nd and 3rd paragraphs of the Summary on pages 4 of 22 and 5 of 22:

*“Whilst there are limitations with any modelling of CAZ, we do recognise that **CAZ C, with traffic management**, has the potential to use wider controls of traffic flows to achieve the desired outcomes. It will be important that **the traffic management approach implemented** is able to respond and either restrict or relax the flow of general traffic as the real-world applications and impacts of the CAZ are monitored. Critical to the successful implementation of CAZ will be robust monitoring and evaluation of the performance of the scheme, alongside a willingness to review and alter the scheme should the real-world performance differ from significantly from the business case.”* [Emphasis added]

Inclusion in the LPPU Para 589f of the words *“It is accompanied by traffic management in Queen’s Square, to provide the necessary additional localised measure to reduce emissions to acceptable level without charging private vehicles”* fails to reflect the clearly stated caveats and the “critical” nature of accompanying “robust monitoring and evaluation” of the traffic management basis of the CAZ that was used to reduce the CAZ from Class D to Class C.

Summary: We submit that paragraph 589f as proposed is not legally compliant and sound. We propose that it be amended either by deletion of the sentence referring to “traffic management in Queen Square” or by addition of reference to the critical and essential requirement for robust monitoring and evaluation, with willingness to review and alter the scheme to mitigate the impacts of “CAZ C with traffic management”.