

## **Matter 15 note to the Inspector – prepared jointly by B&NES Council and the Bath Preservation Trust**

The following is a note that seeks to summarise the areas of agreement and disagreement between B&NES Council and the Bath Preservation Trust prior to the hearing on Matter 15 on 22<sup>nd</sup> September. The note is in the form of a dialogue that has taken place between the two parties (black text is the Bath Preservation Trust and the red italic text is the B&NES Council response).

### **Areas in Agreement**

- The independence of ST5 and ST6 from each other  
*Yes we agree these policies are independent from one another.*
- The fact that ST6 implies that any new P&R has to pass a reasonably high environmental test (ie the implication from ST6 is that P&R expansion or new proposals would NOT be permitted if they did NOT fulfil the criteria of ST6, NE2 and NE2A (as well as other national and local policies))  
*Yes we agree but would suggest the wording be altered to the following:*  
  
*The policies in the Placemaking Plan, as well as other relevant national and local policies, will be used in determining an application for a park & ride site to the east of the city. Of particular relevance is Policy ST6 which sets out the environmental and other criteria that will need to be met. These criteria reflect national policy.*
- The (low) direct impact of any P&R on congestion and air quality on the London Road, as now accepted by the Council (with quantification) especially when the regular P&R buses are factored into the traffic  
*Yes we agree*
- The % occupancy of the P&Rs by 9am (low 20s %) , while noting the rise by 10am  
*We cannot agree this figure as we have not conducted our own analysis of this issue from the park and ride arrival and departure data and there is no methodology of how this figure has been reached from your analysis.*
- More generally, agreement on the data as shown by occupancy (more info to follow on this)  
*Please see the response provided to this more detailed query in the attached document.*
- The fact that the Council commitment in November 2015 to an east of Bath P&R does not override the planning policy considerations of ST6 and other Placemaking and national policies.  
*The benefits or need for a park and ride to the east of Bath need to be considered against policy criteria laid down in the Placemaking Plan and national policies and policies relating to impact of such a measure being implemented.*
- The fact that the Christmas Market and a small number of peak days (Rugby+ University etc) represent uncharacteristic peak occupancy which distort the annual 'normal averages' which ideally you would be able to express separately.  
*We do not agree*

- The fact that the Council has commissioned from Buro Happold some work about Coach parking which also includes within the brief the investigation of temporary solutions to these peak days, expected to report later this Autumn.  
*The Council have commissioned Buro Happold to undertake a Coach Parking Strategy. Part of this strategy is to recommend a management regime for coaches during major events such as the Christmas Market and University Open Days. The consultants are expecting to report their findings to us later in the Winter. It should be noted however that this strategy only covers coaches, not all vehicles entering Bath for these events.*
- I hope we can also reach agreement on the detailed occupancy data as provided by Andrew Lea (see (2) below)  
*Please see the response provided to this more detailed query in the attached document.*

#### **Areas in Disagreement:**

- Public benefit in terms of traffic management, pollution/congestion of P&R
- Acceptability of Environmental impact of ANY P&R on Bathampton meadows sites
- Parking capacity requirements and the ability of an east of Bath P&R to fulfil this.

#### **B&NES Council Response to more detailed questions**

##### **1. Matter 15 Question 2**

We can agree that the traffic management proposals referred to in ST5 are not reliant on the expansion of Park and Ride

*Yes we agree these policies are independent from one another.*

##### **2. P&R Occupancy figures**

We believe that agreement can be reached on the P&R occupancy figures as set out in the ch2m explanatory note CD/PMP/B27 subject to some clarification.

While we appear to have consensus with relation to the Maximum Average Utilisation at Odd Down and Lansdown we do not have the same number for Newbridge. This is more than likely due to the varying capacity levels during 2015 when expansion work was being carried out.

- a) Please explain your methodology for establishing the utilisation at Newbridge in 2015 given that there were 3 different levels of utilisation, and there are gaps in the data when expansion work was being done and there was no automatic counting at the barrier.

*Both the peak or maximum percentage occupancy and average percentage occupancy have been calculated using the same methodology. The approach adopted has been to use the occupancy data from the VMS system installed at each of the park and ride sites.*

*For the peak percentage occupancy analysis the peak occupancy percentage for each day was identified using the reporting tool from the software package. An average of these has been taken for each of the park and ride sites where the data is available for the period concerned. Days with no data or where the data is recorded throughout as zero have been removed from this analysis. The average peak occupancy percentage for all three park and ride sites over the period have then been summed and divided by three to produce an average peak occupancy for all park and ride sites. This process was carried out both including and excluding Sundays.*

*A similar approach was adopted for calculating the average occupancy with the average occupancy data for each day being extracted from the reporting tool available from the software package. This was used to produce an average level of occupancy over the period for each park and ride during operating hours. Again days with no data or where the data is recorded throughout as zero was removed from this analysis. The average occupancy for all three park and ride sites over the period have then been summed and divided by three to produce an average peak occupancy for all park and ride sites. This process was carried out both including and excluding Sundays.*

*It's important to note that when calculating the average peak occupancy percentage and the average occupancy percentage the software takes into account the total number of spaces available in the relevant park and ride site.*

- b) At 2.3, 2.4 and 2.5 you refer to 'the average parking Utilisation' please confirm that you mean the Average *Maximum* Utilisation.

*In this instance we are referring to the average peak or maximum occupancy.*

- c) What is the reason for using Maximum Average Utilisation as opposed to Standard Average Utilisation? Would it be possible to provide both to the inspector, with an explanation for each to avoid confusion and to explain why maximum average capacity has been used.

*When providing infrastructure projects B&NES as the highway authority need to provide for the peak level of usage, not the average. Providing a level of infrastructure that only caters for the average level of demand will result in significant periods of unmet demand. In the case of Park and Ride sites this will result in unmet demand for those wishing to park having to then drive into Bath to park as there aren't sufficient spaces in the Park and Ride sites. This is true when providing all types of*

*infrastructure including roads, junctions, pedestrian crossings as well as Park and Ride sites.*

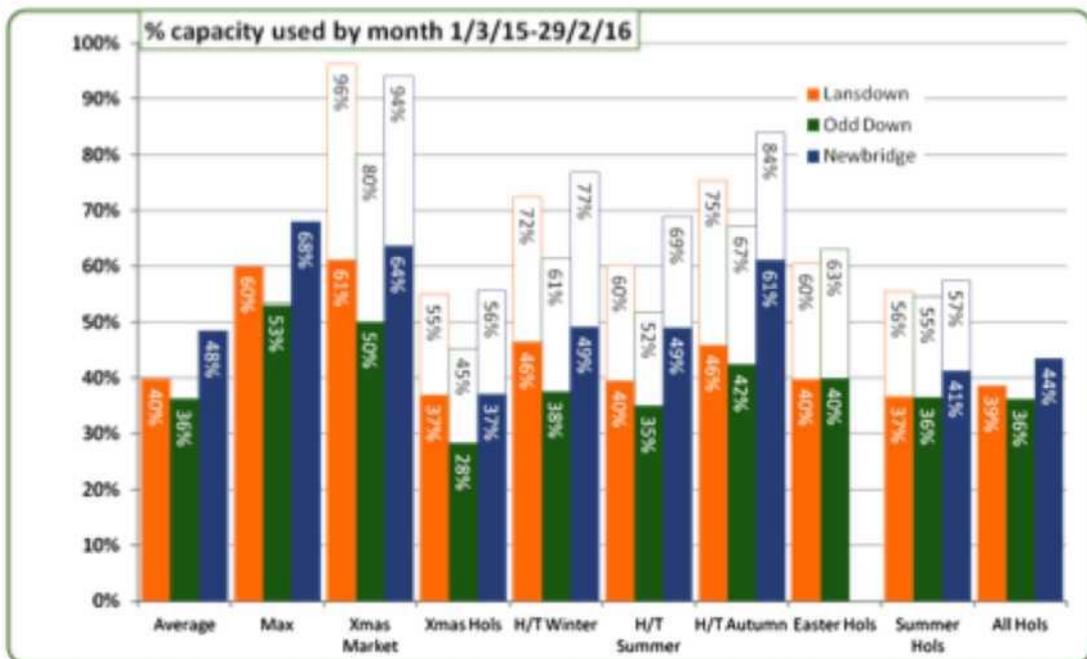
- d) The six-week period when the Christmas Market is held is atypical of normal use across the year. Including this period in the analysis therefore elevates the Average Maximum Utilisation considerably as show in the graph below. Please supply the Average Maximum Utilisation with this period removed.

*Please refer to the answer above.*

- e) Can you confirm that the council is actively seeking temporary overspill parking to meet demand during the Christmas Market period and other events such as university open days and the Bath half marathon.

*As per previous years the Council will be seeking to provide additional overspill parking for coaches only during the Christmas Market to address the current situation. We are not seeking to provide any additional overspill parking for coaches other than this.*

*We are not seeking to provide any overspill parking for private car users for any events in Bath.*



### 3. Occupancy pre and post expansion

The ch2m explanatory note CD/PMP/B27 considers the current Utilisation of the three existing Park and Ride sites at Newbridge, Lansdown and Odd Down and critically how usage has changed since the expansions in capacity added under the BTP.

However it has not been made clear to the inspector when and by how many spaces the capacity increased. Currently the document implies that expansion at Newbridge was undertaken in 2016, but records show that expansion took place in 2015 at Newbridge. On 17/3/2015 capacity was increased to 600 from 450 and then increased again from the 4/8/2015 to 698.

*See Section 2.1 of Core Document ref CD/PMP/B27 Transport Evidence Explanatory Note: Expansion of Park and Ride, CH2M, April 2016.*

The table below set out our understanding of when expansion occurred and the Average Maximum Utilisation of each site pre and post expansion (including Sundays)

	expansion completed	Pre/post expansion capacity	pre expansion max average	post expansion max average	Net change
Newbridge	August 2016	450 to 698	450 (100%)	454 (65%)	4
Lansdown	February 2013	437 to 837	437 (100%)	494 (59%)	57
Odd down	November 2012	1022 to 1252	850 (83%)*	664 ( 53%)	(186)
Combined		1909 to 2787	1737	1612	(125)

\*as stated in 2009 planning application

- a) Please confirm your agreement on the dates in this table

*No – your table above specifies that the Newbridge Park and Ride expansion was completed in August of 2016.*

- b) Please confirm your agreement on the pre and post expansion Average Maximum Utilisation and the net change since expansion

*Figures for average peak occupancy both pre and post expansion of Park and Ride sites have not been calculated for each of the Park and Ride sites on an individual basis but rather for Park and Ride as a whole. As such we can't agree these figures*

#### **4. Site Selection**

We would like to fully understand the criteria used for selecting a suitable site for an east of Bath Park and Ride

- a) Has there been a site analysis that is irrespective of cost and ownership

*A detailed inspection and analysis of all potential sites has been carried out as part of the process to find a suitable site for a park and ride to the east of Bath. Details of this process and the sites considered were published on the Council's webpage as part of the Cabinet meeting that was held on 4<sup>th</sup> May.*