CIRCUS AREA RESIDENTS ASSOCIATION

To: **Bath & North East Somerset Council, Parking Services**

From: **Richard Brown, Circus Area Residents Association**

Date: **October 16 2017**

Title: **Bath Coach Parking Strategy – CARA's response to consultation**

This paper represents the response to the Bath Coach Parking Strategy paper issued by Bath & North East Somerset Council (B&NES) as part of the consultation process.

The response in this paper relates to the Bath Coach Parking Strategy paper only. Comments on the concurrent Parking Strategy are contained in the paper titled 'Parking Strategy – CARA's response to consultation'.

Introduction

The Circus Area Residents Association (CARA) represents over 850 households in over 350 houses in the area of Bath covered in Appendix 1.

The Circus in Bath – the heart of the CARA area - is a spectacular circular development of 33 houses in 3 terraces designed by John Wood the Elder and completed by his son, John Wood the Younger between 1754 and 1766. Its architectural significance is internationally recognised and reflected in the Grade 1 Listed Building status of the buildings and its specific reference in UNESCO's World Heritage Site inscription of Bath as a site of Outstanding Universal Value. The area surrounding The Circus, and also falling within the CARA catchment area, is also of material architectural significance and includes other buildings designed by the Woods, father and son. Two of these streets, Bennett Street and Gay Street, are the main entry streets to The Circus and, as such, carry similar heavy traffic levels.

CARA has adopted 'Traffic Management' as one of its priority objectives. This reflects the intent by its members:

- To reduce car traffic volume and improve traffic flow in the CARA area. This principally relates not only to the main traffic route of Gay Street – The Circus – Bennett Street (which sees a large amount of 'rat-run' traffic) but also to surrounding streets. A large amount of this traffic comes from cars, vans and coaches entering and circling The Circus and nearby streets in search of parking spaces.
- To eradicate coach traffic in the CARA area. This principally relates to the main traffic route of Gay Street – The Circus – Bennett Street but also includes surrounding streets. CARA issued a paper "Traffic Management in The Circus area" on August 3 2017 to request action by B&NES to prohibit coach (and heavy goods traffic) in this residential and important heritage area.
- To improve air quality in the CARA area.

Comments on Bath Coach parking Strategy

CARA supports B&NES view that it "*needs to develop a sustainable coach parking strategy for the City of Bath.*" CARA's stance is explored further, particularly within The Circus area, in its paper "Traffic Management in The Circus area" referred to above.

Unfortunately, we believe that, unlike the concurrent Parking Strategy paper, the Bath Coach Parking Strategy paper is poorly constructed/argued and provides a wholly unbalanced view of the effects of coach traffic in Bath. This damages the credibility of the report. In this, we endorse the stance of FoBRA in their response (attached at Appendix 2).

The concurrent Parking Strategy paper expresses a clear "*aim of putting residents, disabled users and local businesses first.*" Unfortunately, the Bath Coach Parking Strategy does not mirror this aim and, instead, shows a clear bias towards coach operations.

We believe that:

1) The paper is biased towards the interests/preferences of coach operators and passengers at the expense of the interests of Bath residents.
   - The paper is inconsistent with the concurrent Parking Strategy paper. In the latter, there is a clear acceptance that "*Coaches play an important role in supporting our economy, but insensitive coach parking or too many coaches in Bath (particularly during major events) can create problems for residents and other road users in the city*." However, this statement is missing from the Bath Coach Parking Strategy paper.
     a. Further, this statement makes a clear statement that coaches play an important role but the balancing statement states only that they *can* create problems. A more even statement would acknowledge that "*coaches create problems*..."
   - The paper accepts statements presented by coach operators with no challenge. This means that the resulting Strategy has been worked around to accommodate coach operator and coach driver demands.
   - The paper (Page 6) states that "*coach passengers...are interested in getting off and on the coach close to visitor attractions in a stress-free way*" and that "*coach drivers and tour operators want better flexibility and choice in parking options*". However, the paper makes only a single reference to residents stating merely that "*the impact of tourism on the city's residents must be managed*". This is a clear statement that Bath residents do not come first.
   - The paper shows, by its absence, the lack of importance in the Bath Coach Parking Strategy placed on residents' views/recommendations. There are none. However, "*to develop an effective strategy understanding how coach parking in Bath is used*", attitudinal and activity surveys of drivers and passengers were conducted. The BuroHappold report notes that "*In order to understand coach operation in the city and the requirements of coach passengers, drivers and operators, BuroHappold undertook a range of surveys.*.".
   - The paper ignores/tones down unacceptable or illegal behaviour by coach drivers/operators. For example, Page 2 states "*Tourist and leisure coaches operating in Bath on a typical day currently use one of four centrally located drop-off/pick-up sites, and park at Weston Island as well as at <u>unofficial</u> on-street locations around the city*". From our experience in The Circus area, the use of 'unofficial' should be replaced by 'illegal'. We see regular examples of illegal, often dangerous, parking in our residential community. Further, it is our opinion that coach operators/drivers have little interest in the 'health' of Bath e.g. its fabric.
   - The proposed Coach Parking Strategy, if implemented, would facilitate coach movement into the heart of Bath exacerbating traffic flow/pollution issues and accentuating the adverse impact on the city's fabric e.g. the effect of coach weight over the fragile city-centre vaults underneath many roads.
2) The paper fails completely in any attempt to accurately measure the economic benefit/cost of coach traffic to Bath.
   - There is a blind acceptance as fact numbers that are likely to be highly inaccurate. For example, Page 6 states that "*coach passengers spend over £180,000 a day in Bath*". There is no attempt to prove the accuracy of this figure which is an extrapolation from a very low base arising from the BuroHappold report.
   - There is no effort to quantify the cost of uncontrolled coach traffic in Bath. Such costs include the economic impact of reduced traffic flow, reduced parking options, noise pollution, air pollution, the impact on building fabric and public infrastructure, the risk to road safety and an adverse impact on the tourist 'offer'.
3) There is an implied acceptance that tourist coaches have the right to navigate Bath's historic city centre streets. We do not accept this view. We believe that the report should be more ambitious in setting a compelling long-term coach management plan. For example, the BuroHappold report notes that the historic city centre of Salzburg is pedestrianised, and coaches are not permitted to enter it. Why can we not be as visionary?
4) We do not support that coach charging should merely be that "*The cost to the Council of managing coaches should be covered*" (Page 9). This makes no attempt to secure from coach operators the intangible costs of accepting coach traffic in our city. We should be more ambitious in securing value to access our wonderful city and World Heritage site.
5) We do not believe that the Coach Parking Strategy reflects best practice with regard to coach management in leading world cities, particularly those with World Heritage assets. We are surprised that neither the summary nor the 235-page BuroHappold report mentions that Bath is a World Heritage Site. We are disappointed that this fact has not been incorporated into the Strategy and we are disappointed that best

practice of higher-profile historic European cities (other than Salzburg) has not been considered in the report.

- For example, ongoing parking by coaches along Royal Avenue materially impacts sight lines to/from the Royal Crescent, one of Bath's most prized heritage assets. Such penetration of coaches into Bath's city centre would simply not be permitted by other major cities.

There are elements of the Bath Coach Parking Strategy that we welcome e.g. to encourage longer stay and pre-booked visits by the provision of high quality coach parking facilities outside the city centre and supported by an appropriate pricing structure and the use of new technology to improve coach management. However, we do not agree that coach drop-off/pick-up should be throughout the city centre close to attractions. The resulting effect will be contrary to B&NES' intent to achieve a city centre free of all but essential traffic. CARA does not believe that coaches should be permitted in the historic core.

Conclusion

The Circus Area Residents Association (CARA) has adopted 'Traffic Management' as one of its priority objectives. This reflects the intent by its members to reduce car traffic volume and improve traffic flow in the CARA area, to eradicate coach traffic in the CARA area and to improve air quality in the CARA area.

CARA supports B&NES view that it "*needs to develop a sustainable coach parking strategy for the City of Bath.*" Unfortunately, we believe that, unlike the concurrent Parking Strategy paper, the Bath Coach Parking Strategy paper is poorly constructed/argued and provides a wholly unbalanced view of the effects of coach traffic in Bath. This damages the credibility of the report.

The concurrent Parking Strategy paper expresses a clear "*aim of putting residents, disabled users and local businesses first.*" Unfortunately, the Bath Coach Parking Strategy does not mirror this aim and, instead, shows a clear bias towards coach operations.

As such, we are AGAINST the strategy proposed noting that:

1) The paper is biased towards the interests/preferences of coach operators and passengers at the expense of the interests of Bath residents.
2) The paper fails completely in any attempt to accurately measure the economic benefit/cost of coach traffic to Bath.
3) There is an implied acceptance that tourist coaches have the right to navigate Bath's historic city centre streets. We do not accept this view.
4) We do not support that coach charging should merely be that "*The cost to the Council of managing coaches should be covered*". This makes no attempt to secure from coach operators the intangible costs of accepting coach traffic in our city. We should be more ambitious in securing value to access our wonderful city and World Heritage site.
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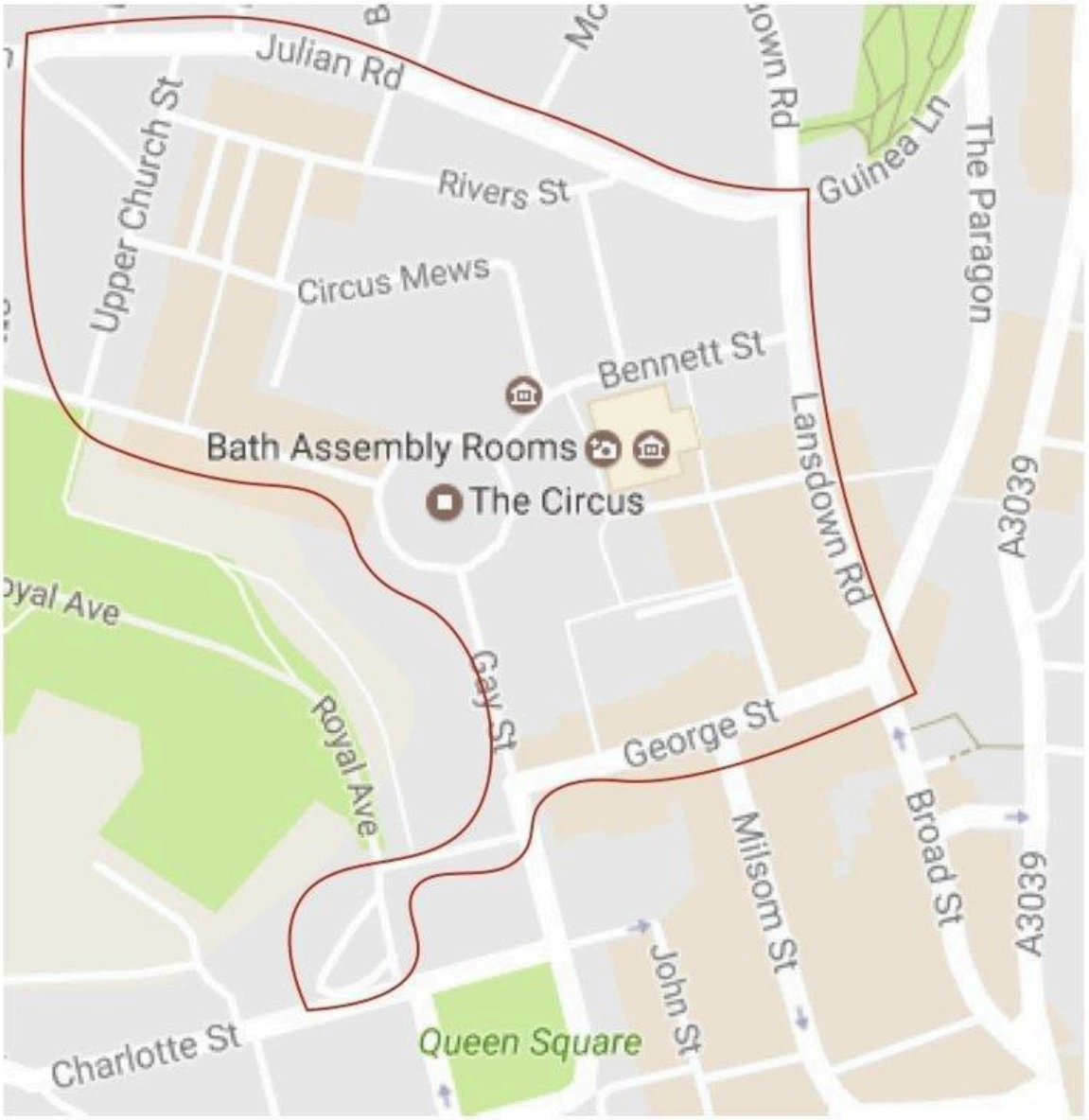
Appendix 1 – CARA catchment area



Appendix 2 - FoBRA draft response to B&NES Council consultation on Coach Strategy

1. This strategy is totally flawed. It completely fails to recognise the severe adverse impact of coach traffic on the city, analyse the contribution that coaches are claimed to make to the economy, or 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. It is notable that Buro Happold conducted surveys of the views of coach companies, drivers and passengers, but none of Bath residents. FoBRA attended the Stakeholder meeting in 2016 and made these points, but no account has been taken of our views.

2. In the view of many residents (and some businesses), coaches are a plague. They are visually intrusive and generate high levels of congestion and air pollution. Yet they are currently permitted to come into the very centre of the city and drop off just metres from some of the Key Elements of the World Heritage Site (WHS) such as the Roman Baths, the Pump Room and North Parade. They park at Royal Avenue, within view of Royal Crescent. Others drive round The Circus (another Key element of the WHS) twice before departing for Stonehenge, or wherever, often without stopping in or contributing to Bath. Coach demand is forecast to increase by 24% by 2026.

3. One of the places worst affected by coaches is Terrace Walk (Bog Island), where the Buro Happold report records 50 coaches arriving each day. Local residents' impression is of much higher coach traffic. Whatever the actual number of arrivals, coaches create enormous congestion there and on the approach roads, gravely affecting the amenity of the area. Air pollution nearby in Manvers Street is 44 micrograms per cubic metre ($\mu g/m^3$) of nitrogen dioxide, significantly over the legal limit of 40 $\mu g/m^3$. There is no published data for Terrace Walk itself, but pollution there is likely to be higher, because of the concentration of coaches. The source analysis in the consultation on the Bath Air Quality Action Plan (AQAP) shows that 79% of air pollution in the area (as well as in Dorchester Street and St. James's Parade) is generated by buses and coaches. Yet the strategy actually proposes to increase coach parking in Terrace Walk, and formalise and increase parking at Royal Avenue.

4. The strategy document nods at B&NES Council policies to reduce traffic in Bath especially in the historic core, but then ignores them. All B&NES's 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 (including Manvers Street and Orange Grove). 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. 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. The proposals in the strategy are quite incompatible with these policies.

5. The WHS Management Plan recognises that coach traffic can be 'problematic', especially in terms of parking, and contains an Action 42: 'Engage with proposals to address coach parking within the WHS, and seek to ensure that sustainable solutions are delivered which maximise the benefit and minimise any harm to the WHS'. We do not believe that this strategy achieves that objective.

6. On the other hand, there is little analysis of the actual contribution to the economy made by various types of coach visitors. Clearly coaches that simply drive round and depart contribute nothing to the city except congestion and pollution. The draft Destination Management Plan states that two-thirds of coaches stay for less than 3 hours. Most visitors make a very limited contribution to the economy, with 50% spending less than £30. They may make a direct contribution to B&NES's coffers if they visit the Pump Room and Baths, but that cannot be an overriding factor. Arguably short-stay, low-spending visitors contribute less to the city than the harm they cause.

7. Coach drop-offs should be provided at less congested locations outside the city centre and away from the iconic places that form the essence of the Bath visitor experience: for example in the areas of Pulteney Road, Lower Bristol Road (accessing the centre via the new Bath Quays bridge) or Victoria Park. Figure 1 of the Executive Summary highlights locations that could be used, albeit they are identified as places for parking rather than drop-off. They are within a reasonable walking distance of the attractions. Special arrangements could be made for disabled passengers.

8. That might affect the operators' schedules, and some customers might dislike the idea of walking a little distance. Some may choose not to visit, but that should be an acceptable price for protecting our city. Neither B&NES nor the residents of Bath are under any obligation to provide business for the coach operators.

9. Another alternative would be to drop off coach passengers at the Park and Rides, from where they would travel in on the P&R buses. This appears to be an aspiration for the longer term, but there is no reason why it should not begin immediately.

10. The coach ban currently in force on Brock Street should be extended to Bennet Street and Gay Street so as to remove the coaches which drive round The Circus, causing congestion and pollution and no benefit to Bath.

11. B&NES Council should reject this document and direct that a revised strategy is prepared which is consistent with the traffic reduction aims of the Core Strategy, PMP, Transport Strategy and the PRMS, and the requirement which has been placed on the Council to bring air pollution within the legal limit as soon as possible. The revised strategy should include a full analysis of the economic benefits of the various types of coach visits (eg those that drive round without stopping; short-stay trips; and those delivering longer-stay visitors), in line with the aspirations of the Destination Management Plan to pursue value and quality not just more tourists. Coaches must be managed, not simply accommodated.

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