

## **Submission to Communities, Transport and Environment Scrutiny Panel about Cabinet Decision E2861 of 25 January 2017**

Speaking on behalf of Transition Bath Transport and Built Environment we support the Call In notice and this afternoon would like to speak about objections set out in paragraphs 1 and 6.

B&NES council has conspicuously failed to demonstrate that there are any substantial public benefits to this scheme.

DEFRA no longer supports Park and Rides as a way to reduce congestion or air pollution. Evidence shows that unless you reduce the number of parking spaces in the centre by the same amount that you build on the periphery in Park and Rides, then you will not reduce traffic in the city centre. At certain times of the day Bath is already at a congested equilibrium, people change their behaviour according to traffic levels and make decisions about whether to drive depending on the ease of finding a parking space. Parking spaces in the centre of town vacated by people using the Park and Ride will be filled by other drivers.

Even the council now admits that an East Park and Ride will do little or nothing to improve congestion on the London Road and thus in turn will do little or nothing to improve air pollution, as peak usage of Park and Rides in the middle of the day does not coincide with peak congestion during morning and afternoon rush hours. A Park and Ride may actually increase congestion on the main eastern routes and in east of Bath rural areas, as more people use their cars to get to the Park and Ride rather than use public transport. Even with a Park and Ride the main A4 London Road into Bath will continue to be heavily used by A46/A36 through traffic by coaches, lorries and other vehicles, by local residents and by parents doing the school run.

The council's own data shows that Park and Rides are not popular in Bath and are underutilised. On an average day there are 1,600 free spaces across Bath's existing Park and Rides and they are only 41% full. Demand has not changed over the past five years. No recent research has been conducted about whether anyone would actually use a new east of Bath P&R.

Park and Rides put other bus services at risk, which will not help with the stated aims of improving the proportion of journeys made by public transport. Park and Ride buses offer cheaper fares to Park and Ride customers, who stop using bus services that are vital to the local community.

ClientEarth won its High Court case against the Government over its failure to tackle illegal air pollution across the UK. In September 2016 DEFRA recommended that B&NES merge transport and air quality plans to ensure that air quality is central to traffic management. Not only does this advice seem to have been ignored but with the recent presentations by B&NES Environmental Monitoring who are in the process of reviewing and updating the Bath Air Quality Action Plan we have been advised that they have no budget to put any recommendations into action. Air pollution has been recognised as the worst single environmental health problem in urban areas and instead of a costly Park and Ride, we should use those funds to prioritise a modal shift from cars to public transport, bikes and walking.