

Bath and North East Somerset

Meeting of Scrutiny Panel for Communities, Environment, Transport

Monday 4th December 2017

Statement by Rachel Demuth

Re: Bath Coach Parking and Pick-up and Drop-off Strategyⁱ (BCPS 2017)

I will address only three important points about the unacceptable Air Quality levels in Bath and the Coach Parking proposals in the BCPS 2017) the strategy, and will be referring specifically to the report which was commissioned by B&NES. The three points are:

1. The worldwide and UK medical authorities declared urgency on the strong causal relationship between air quality and both morbidity and mortality.
2. The July 2016 DEFRA legally binding Direction on Bath specifically to improve the Air Quality and Pollution levels in Bath.
3. The proposals in the Bath Coach Parking report (BCPS 2017).

1. Current unacceptable Air Quality (read: Air Pollution) and the high morbidity and mortality globally, in the UK, and specifically in Bath.

In the 2016, the WHO published a report on the global crisis of air pollution and health:

“To date, air pollution – both ambient (outdoor) and household (indoor) – is the biggest environmental risk to health, carrying responsibility for about one in every nine deaths annually.

Ambient (outdoor) air pollution alone kills around 3 million people each year, mainly from noncommunicable diseases. Only one person in ten lives in a city that complies with the WHO Air quality guidelines. Air pollution continues to rise at an alarming rate, and affects economies and people’s quality of life; it is a public health emergency.ⁱⁱ

The Lancet Countdown on world Health and Climate Change in 2015ⁱⁱⁱ reported that 71.2% of nearly 3000 cities in the WHO database (including London) are still above WHO recommendations of 10µg.m³· Road transport was still the major source of NO₂ and particulate matter.^{iv}

The Royal College of Physicians (RCP) is one of the senior medical profession organizations in the UK. They have a history of engaging in public health politics in the UK. In 1962 they published a report on Smoking and Health that

established the evidence that cigarette smoking was the main cause of lung cancer. They also actively campaigned for change in the acceptance of smoking. They joined with the Lancet in Oct 2017 to produce a briefing for UK policy makers on the Lancet Countdown report. The RCP recommended for the UK local and national governments that:

The RCP recognises that while smoking kills 80,000 people a year in the UK, smoking is voluntary. Air pollution kills nearly half as many a year as cigarettes at 40,000, but breathing toxic, polluted air is involuntary. All of us have no choice but breathing in toxic air. The RCP teamed up with the Royal College of Pediatrics and Child Health (RCPCH) to produce in 2016 a hard report on *Every Breath we Take; the lifelong impact of air pollution*.^{vi} The campaigning mood of these leading doctors is signalled by their stating in this report that, “*When our patients are exposed to such a clear and avoidable cause of death, illness and disability, it is our duty as doctors to speak out*”

They have recommended immediate action, by all policy makers, with the objective to reduce both the existing levels of air pollution in the UK and peoples exposure to toxic pollution when they breathe. They want to target the vulnerable (pregnant women, children, the elderly and the already ill with bronchitis, signs of heart disease etc. They recommend Clean Air Zones, better management of transport (emission control and traffic movements), monitoring of pollution in cities, etc.

NICE (National Institute for Health and Care Excellence) is a respected voice in health policy and practice in the UK. NICE has also released strong guidance^{vii} on similar local government planning measures as the RCP.

2 The DEFRA legally binding Direction to reduce levels of pollution in the shortest time possible.

This action is in part responding to the significant reports from the WHO, and the UK's RCP and NICE reports that were published in 2016 and early 2017. It clearly requires that early action and progress in reducing the levels of pollution, especially NO_x in selected UK cities, including Bath, be taken and be evidenced.

The immediate implication of this is that improved air quality and reducing pollution levels should be identified among lead objectives of B&NES planning at all relevant levels. Already, in 2017 the Bath Air Quality Action Plan Consultation Draft (final) appeared in August 2017. The paper begins with Fig 1 on page ii, showing that 12 sites that were monitored in 2016 produced annual readings for NO₂ that were all exceeding the acceptable level of 40 µg/m³. The RCP stated in their report that they would like to see acceptable levels as low as 10 µg/m³ since it is not possible to show evidence of a level of NO_x pollution that is harmless.

The DEFRA requirements set the minimum standards to assess the Bath Coach Parking Strategy.

3. The Bath Coach parking and pick-up/Drop-off Strategy.

To begin, some pertinent observations on the BuroHappold report.

I found it extraordinary that they didn't consider air quality impact of coach traffic anywhere in their report. They didn't mention their brief, so I don't know whether it was intended or whether it was purposively omitted, or just not considered relevant. But failure to consider the air quality impact of not only additional coaches being directed right into the heart of the city of Bath twice, to drop off and again to collect passengers, but also on the baseline level of pollution from traffic in the centre of Bath. Without any consideration of the impact of their allocation of coach traffic movements and drop-off locations around the inner and central Bath, their recommendations must be set-aside as incomplete and inadequate.

The coach traffic was surveyed only on two days in 2016, Thursday the 25th August and Saturday the 27th August. Both were in school holidays and the Saturday was in the Bank Holiday weekend. Both would have been unusual traffic days, possibly with less local traffic in town

The study didn't speak to or survey the views of residents or workers in the centre of Bath or on any of the access roads or suggested parking locations. There was no mention of any questionnaire survey or results of the same. There was mention of resident participation in a stakeholder meeting on Thurs 10th October 2016. 21 people attended, only one was not a B&NES or BuroHappold employee, a coach company owner, member of the Chamber of Commerce etc. Patrick Rotheram was representing the Federation of Bath Resident's Associations.

But coach passengers were represented with a dedicated survey of their own. Given that the majority were foreign, mainly Chinese with Mandarin as their first language, just what did they make of the terms in their questionnaire ; 'site characteristics', 'Environment', 'Visitor experience getting to and from site'? The coach staff were given bulk questionnaires to distribute on the return journey. Passengers were meant to fill in the forms and return with a stamped envelope ...Was the survey piloted? How many were given out and how many were returned are two pertinent questions.

Coach drivers and the owners of coach companies were also questioned .

A weighting system was applied to the questionnaire scores. The multiplier weightings were devised by "a consensus of the B&NES Council working group on the coach study". No mention of the criteria used was given. But the highest weighting was for the 'Visitor experience getting to and from Site.' Fancy that.

The highest scoring drop-off sites happened to be the closest to the Roman Baths.. Fewer than 5% of the passengers were dissatisfied with those drop-off

locations. In fact, the ranking of the drop-off sites reflected what was already happening as coaches moved from Riverside, which B&NES was beginning to wind down.

Coach drivers and owners seem to have preferred the Riverside Coach Park as it was much easier to access and has facilities (toilets and café for the drivers). Several (5 out of 7) are also quoted in the report as saying they would prefer the Poultney Road parking to the centre (Terrace Walk, Orange Grove, Grand Pde, and North Pde). Again I presume that drivers don't like driving into and out of the congested inner-city traffic and would prefer to drop-off on the main route into Bath they were using.

The report says that B&NES had two objectives in mind when launching the Coach study. First was to find an alternative for the Riverside site that they had other plans for. Second, to be consistent with the Getting around Bath Transport Strategy (2014). The report says that B&NES saw coaches having an important economic contribution to the city and sought to increase the role of coaches in dropping off spending visitors in the city centre while simultaneously reducing other visitor car parking in the city centre. However the GABTS 2014 has one of its Policies, GABP4, state " Vehicle movement should be better managed to reduce traffic impact and emissions, particularly in the city centre where there is less space available.". And GABA12: "Develop programmes to remove traffic from the central areas of the city and reduce its impact on other areas....". Seems B&NES has many directly conflicting plans for traffic and parking in the centre of Bath.

It seems the new initiatives to reduce traffic and improve air quality in the city centre 'urgently' or 'as soon as possible' are conflicting objectives with the BuroHappold Drop-off recommendations. They also conflict with B&NES other objective of reducing the impact of all vehicles in the historic city centre. It seems that such considerations plus the impact of more coaches in the city centre on air quality and pollution (which will grow as coach numbers grow and the medical and public concern with the health effects of vehicle pollution grows) support locating most of the coach drop-off and pick-up points out of the city centre. Cities like York ban coaches from within the City walls, and Liverpool also keeps coach drop-off locations away from the centre. It is normal or common in other historic cities in Europe. Is there any reason to believe that coach visitors to Bath would fall away if they had to walk 300-500 meters from a drop-off point? Having fewer coaches and less polluted air in the historic centre might even be an added attraction for tourists.

Let's look at the reports recommendations for Coach Drop-off locations. The Table 1 below shows in column 1 (Spaces available) based on their appraisal of the sites. The Score shows the weighted scores in the report. When the report came to *recommending* locations, they dropped both Orange Grove and Grand Parade for sensible reasons (increased traffic congestion and both have already other uses (for taxis and local bus stops and traffic respectively). The added pollution around the Guildhall is contradicted. I have also dropped the existing

spaces in Terrace Walk for the same reasons. The proposals for 5/6 spaces in Terrace Walk can be seen from the report's three drawings of their proposed configurations would mean a highly congested Terrace walk with added traffic congestion in the road leading to and around the Guildhall and also the junction to North Pde and to Manvers St. As one service provider commented in the report, the site doesn't allow for the increasingly large new coaches that are on the London-Bath runs now. In addition, the location is already a nightmare for passengers trying to get from the island to and back from the safety of the pavement on the west side of Terrace walk, and also for the pedestrians walking from Orange Grove along the East side of the island and down Manvers St towards the station. This is a busy pedestrian way that is already made difficult with the presence of coaches and other traffic turning both ends of Terrace Walk. Signage is not the problem: it is the nature and size of the heavy traffic making difficult turnings into and out of the Terrace Walk.

But a major consideration was also the need to remove additional coaches and associated loss of air quality from the inner-city core, especially around popular pedestrian routes accessing the heritage of the area. I recommend the site serve the other local minibuses, client access to the Abbey Hotel, and important delivery access destinations for the businesses in the narrow streets neighbouring the Terrace Walk. The location could become an important drop-off and pick-up for frail or disabled people delivered there in minibuses, even from the main coach drop-off locations.

Both the Royal Ave and Poultney Rd are already used by greater numbers of coaches. The Royal Ave is useful space out of the busier traffic routes. The location of only 5/6 drop-off locations that were managed and 'official. Could provide a more orderly drop-off that also is close to both the Royal Cres, No 1 Royal Cres, the Assembly Rooms, and the Fashion Museum. Poultney Rd is already used by variable and larger numbers of coaches on rugby days. Providing a regular location for managed coach drop-offs would be continuing a usual practice and also provides a location near both the Holbourne Museum and the historic Great Poultney St as a walk into the centre of Bath.

The table includes the Riverside location. That Terrace Walk is the most used drop-off location appears to have arisen only after B&NES announces that Riverside may not be available in the future. But the reports records views of some drivers stating a preference for the Riverside. It is easy coach access and has the facilities all drivers (and passengers) need at the end of journeys. It is also close to the city centre and it works. It is being used now for coach drop-offs during the extremely busy Christmas Market, so B&NES must consider it a safe and acceptable location.

The report also says that B&NES would like to find an alternative site in the inner city. The BuroHappold report couldn't locate an equivalent one and there are many sound and important arguments that there should no longer be additional coach traffic routed into the centre of Bath. Also the Riverside needs to be maintained and used as a location for Drop-offs and collection into the mid-and

long term. It provides a valuable and versatile contingency coach space. The police horses and their transport are using the Riverside location to service the crowd at the Christmas market this year. There was also a recorded statement in the report that, if needs be, the Riverside site could be retained. I recommend that. In Table 1, I have allocated only 5/6 drop-offs be allocated to that site, which may be to the relief of most drivers and passengers. (it is the only site in Table 1 with both a toilet and café).

<u>Location</u>	<u>Spaces Available</u>	<u>On/off street</u>	<u>Total Score</u>	<u>Report choice Spaces</u>	<u>My recommendation</u>
<u>Terrace Wlk</u>	<u>2</u>	<u>On</u>	<u>67</u>	<u>5/6</u>	<u>0</u>
<u>North Pde</u>	<u>2</u>	<u>On</u>	<u>66.1</u>	<u>2</u>	<u>0</u>
<u>Royal Ave</u>	<u>14</u>	<u>On</u>	<u>60</u>	<u>3</u>	<u>5/6</u>
<u>Grand Pde</u>	<u>3</u>	<u>On</u>	<u>58.7</u>	<u>0</u>	<u>0</u>
<u>Orange Grove</u>	<u>2</u>	<u>On</u>	<u>58.2</u>	<u>0</u>	<u>0</u>
<u>Poultney Rd</u>	<u>7</u>	<u>On</u>	<u>57.6</u>	<u>3</u>	<u>5</u>
<u>Green Pk Rd</u>	<u>4</u>	<u>On</u>	<u>57</u>	<u>4</u>	<u>4</u>
<u>Rossiter Rd</u>	<u>6</u>	<u>On</u>	<u>54</u>	<u>6</u>	<u>6</u>
<u>Riverside</u>	<u>12</u>	<u>off</u>			<u>5/6</u>
<u>TOTAL</u>					<u>20</u>

Table 1 (Based on report Table 7.9) The spaces available as Coach drop-off locations in the report with my recommendations for allocating spaces in the short term and possibly into the med- or long term.

From Table 1, without the inner city locations, 20 walkable city locations for drop-offs can be provided without additional coaches being directed into the inner city. Walking would be more pleasant with fewer inner city coaches. The encouragement of more walking within Bath was a healthy and enjoyable

recommendation of several UK reports quoted here that recommend urgent action to improve the air quality in UK cities.

If B&NES decide to support their own recommendation to reduce both traffic and air pollution in the city of Bath, a related and additive benefit could be to regulate the times that delivery vehicles can enter the main shopping area of the inner city to those outside 0800-1630 hrs or such suitable timing.

I have not addressed the longer-term parking of coaches discussed in the report. My concern today is with the important protection of the inner-city air quality. That objective draws attention to and provides a logic for addressing traffic management, parking, inequality, vulnerability and the general health and well being of all the people in BATH. We all need to breathe, let's work to ensure that we can breathe air that helps us lead desirable working and leisure activities and not that makes us ill and kills us without our choosing..

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ⁱ BuroHappold (2017) Bath Coach Parking Pick-up and Drop-off Strategy. Final Report

ⁱⁱ WHO (2016) Ambient air pollution: a global assessment of exposure and burden of disease.

ⁱⁱⁱ Published Online October 30, 2017 [http://dx.doi.org/10.1016/S0140-6736\(17\)32464-9](http://dx.doi.org/10.1016/S0140-6736(17)32464-9) (Accessed 26 Nov,2017)

^v Lancet/RCP (2017) Lancet 2017 Countdown report : briefing for UK policymakers.

^{vi} RCP/RCPC (2016) *Every breath we take; the lifelong impact of air pollution.*

^{vii} NICE (2017) Air pollution: outdoor air quality and health. NG70. June 2017.