

LA Major Schemes Development Pool : Expression of Interest

Response to the Submission by Bath and NE Somerset Council from - Response2Route and Newbridge Matters : *campaigning on behalf of local residents in Locksbrook and Newbridge, Bath*

In their Expression of Interest, Bath and North East Somerset Council have taken some measures to reduce the costs of the Bath Transport Package (BTP) but have retained two of the most controversial and costly elements of the scheme – the Bus Rapid Transit (BRT) route through Newbridge and the expansion of the Newbridge Park and Ride (P & R) site. Response2Route and Newbridge Matters (two residents' campaign groups in the west of the city) have consistently opposed these two elements. Our objections are not only based on the adverse impacts these developments will have on local residents and the environment, but also on the flawed arguments in the Council's business case relating to the 'improved journey times' and the costs of these elements of the scheme.

Our objections have had widespread public support plus the support of a large number of local councillors. Local organisations have voiced their opposition and the local MP has also spoken out against the BRT and the expansion of the Newbridge Park and Ride.

Newbridge Matters and Response2Route recognise that Bath faces problems with traffic congestion at peak times in the city centre, whilst through traffic continues to create congestion and pollution. We wish to see a workable and effective public transport solution to Bath's traffic and transport problems. This paper demonstrates that there is an alternative which we believe is more cost effective, environmentally less destructive and will improve journey times. In addition it will regenerate a run down corridor which is a main route into the city. Regrettably our alternative proposal has never been adequately considered by the Council.

1. The Case for Excluding the Off-Road Section of the BRT and the Newbridge Park and Ride from the Bath Transport Package

There are 5 elements to the BTP:

- Showcase bus routes covering most of the city
- A single BRT route across the city between an expanded P&R site at Newbridge and a new P&R site at Bathampton
- Other expanded P&R sites
- City centre access restrictions, bus priority, and pedestrian improvements
- Travel information systems

BRT Issues

- B&NES council have never carried out a like-for-like comparison between the BRT and its alternatives. This should have been done at the beginning of the project. Without it, there is no data to back up the claim that it is the best option. The only data provided by B&NES (produced late in the day in response to criticism of their proposal) was based on a very cursory desk top exercise which omitted various key costs.
- There is no particular reason for the single chosen route in the city bus route network to be designated a BRT: for example, the BRT route connects two P&R sites to the city centre, but the other two P&R sites are connected by Showcase routes.
- 83% of the BRT route is on-road and is no different in principle from what can be achieved on any Showcase route.
- The BRT route operates on all-purpose streets through the city centre, with no access restrictions for other vehicles before 10.00. The supposedly 'Rapid Transit' route will be subject to the same level of delay and unreliability in the morning peak as any other bus route.
- The off-road section of the route of a former railway line parallel to Newbridge Road/ Upper Bristol Road, 1.4km long or 17% of the total route, bypasses a section of on-road route that is not exceptionally congested other than at its east end where it meets Windsor Bridge Road. The off-road section will rejoin the road network at Windsor Bridge Road, precisely where the congestion problems begin, rather than bypassing the problems.
- The short length of off-road route is not capable of shaving more than a very few minutes off the journey time at peak travel times, yet accounts for half the cost of the BRT proposal.

- It is highly unlikely that the off-road section, in isolation, would have a positive effect on the benefit cost ratio (BCR). Indeed the current First Bus timetable for the route states the journey time for the existing route is 10 minutes both on weekdays and at the weekends. If congestion on the route were an issue we would expect the weekend journey times to be noticeably shorter.
- The off-road route is very damaging to the local community destroying the amenity of linked open spaces along the route of the former railway line. It also affects the relatively peaceful back gardens and residential areas which provide respite from the main roads.
- The 'ftr' buses proposed for the BRT route have proved controversial in York and Leeds, and incur significant capital costs in having to modify existing road geometry because of their size.

The proposed BRT route would operate satisfactorily as a Showcase – or even 'Showcase-plus' - route without the off-road section, with maximum implementation of on-road bus priority measures, and with a lesser upgrade in vehicle specification. There is also an alternative on-road route from Newbridge P&R along Lower Bristol Road, which may offer positive advantages - not adequately assessed in the MSBC.

Park and Ride Issues

Response2Route and Newbridge Matters have concerns about the expansion of the Newbridge P&R site, and other groups oppose other sites. The general comments below on P&R apply to all sites, but also include site-specific comments to Newbridge.

- The benefits of P&R are invariably overstated: even several thousand parking spaces often represent a very small percentage of total traffic movements in an urban area.
- Even if P&R does have a noticeable effect on traffic volumes, it is just as susceptible to induced traffic effects as are new roads purporting to 'relieve' the existing road network.
- P&R has a track record of unintended consequences, for example capture of trips from public transport; increased car trips outwards from downstream of the P&R site, contrary to the perceived model of diverting trips from upstream; and rationalisation of ad-hoc park and ride with little change in travel behaviour or traffic patterns.
- The Newbridge P&R expansion is in, and affects, a World Heritage Site, AONB, SNCI, Green Belt, and has impacts on

European protected species defined by Annex IV of the Habitats Directive and strictly protected under Article 12 thereof. The cumulative importance of this array of designations has been consistently underplayed in the environmental assessment, and in most appraisals would almost certainly lead to a rejection of such an option. As one example, in the tests for derogation from Article 12 for protected species, the environmental assessment background paper tries to argue that "considerable benefit" equates with "imperative reasons of overriding public interest", and tries to argue non-availability of alternatives in terms other than issues relating to the protected species. Both positions are contrary to EU guidance and case law.

- The new parking area at Newbridge is much closer to residential properties and in part will disturb contaminated land.

There is a role for park and ride as a component in a wider traffic reduction strategy for Bath but it is difficult to demonstrate from the figures produced that this is a cost effective measure. The BTP would still achieve meaningful improvements to transport in the city even with much lower increases in P&R capacity, and with significant cost savings.

Costs

The BRT alone accounts for 50% of contract works costs in the 2006 Major Scheme Business Case (MSBC), and the off-road section accounts for about 40% of the BRT cost or just under 20% of total BTP costs. Three of the P&R sites account for 20% of scheme costs in MSBC. The Newbridge P&R is absent from the MSBC cost summaries, which may explain some of the scheme cost increase since the MSBC. If Newbridge is added, the P&R sites account for more like 25% of scheme costs.

2. Alternative proposals

2.1 Park and Ride

Bath and North East Somerset Council could still achieve their objective of expanding P & R capacity at Newbridge by moving the site across the river on to Duchy land. In fact the Council considered this option in 2005 and showed this site as a P & R location together with a depot and salt store in their Bath Plan. The Public Inquiry into the plan in 2006 did not reject the car park proposal but the Inspector did object to the proposed salt store being located on Green Belt land.

This site could accommodate the extra capacity proposed for the P & R and would have the added advantage of giving access directly from the dual carriageway. The current site requires cars to navigate a narrow river bridge to gain access.

Our proposed alternative site is designated agricultural land so we do not think that the land costs would be more than the costs for the current scheme. We believe that the construction costs would be significantly lower because the current P & R site requires -

- Excavation over the whole of the site of heavily contaminated material and safe removal from site, as it was used as a commercial and domestic refuse tip. This is a Planning condition.
- The laying of two special Geotextile membranes in the base construction over the whole of the site, in order to prevent the contamination of the adjoining Nature Conservation Area and to prevent the drainage of ground water, so lowering the water table. These membranes would need to be replaced from time to time as they would clog up and not fulfil their purpose. (B&NES' consultant's directions.)
- The construction of substantial underground surface water tanks to retain water from the site in order to try and stop the site from flooding and causing flood water from flowing over the adjoining car park and then on to Newbridge Road. B&NES' consultants have admitted that the site will flood and calculations have shown that at times the surface water tanks would not have adequate capacity.

2.2 The BRT

The segregated BRT running along the former route of the railway line should be scrapped. As an alternative, we suggest that the P&R buses leave the new P & R site and drive east along a dedicated bus lane on the Lower Bristol Road – there is already a reserved bus lane for most of this route. This would be quicker and cause less disruption to traffic flow than the proposed segregated BRT as there would be only two set of lights between the proposed P&R and the Windsor Bridge. The off-road BRT route will require at least four sets of lights.

This route has the added benefit of regenerating a run-down corridor into the city. It could also provide a better bus service to an area which is currently poorly served (Twerton and Westmorland).

A new roundabout at the south end of Windsor Bridge Road would take the bus into the Western Riverside Development (WRD). On the return journey the bus would enter the roundabout from WRD, cross Windsor Bridge and proceed west along the Upper Bristol Road back to the P&R site. This stretch of road already carries the P & R buses and is not congested – journey times are good.

The costs of the off-road BRT have increased significantly since the original bid and we believe that these have still been underestimated. There are some significant engineering problems which have not been adequately accounted for in the business case, e.g. the lowering of the sewer, re-location of storage tanks and structural work to an existing bridge.

3. Is the new Council bid about improving public transport ?

We think that the council's submission represents a significant change in emphasis from the original bid and MSBC. The claimed benefits of the BTP in reducing congestion and the proposals for public transport enhancements have been downplayed in the Expression of Interest document, whilst the economic and employment benefits are highlighted in a way that was a lot less evident in the original MSBC. To quote from the MSBC

'The Bath Package sets out to improve the alternatives to the use of the private car by providing a modern, integrated and easy to use public transport system. The overall aims of the package are -

- To create a high quality public transport system to ensure that attractive alternatives exist to the use of the private car*
- To reduce congestion and improve air quality*
- To improve accessibility*
- To secure environmental improvements*
- To create an effective and efficient transport system that will encourage the Bath Western Riverside regeneration project and other future developments'*

The publicity material produced by the Council for the public consultation on the BTP similarly emphasised the improvement to public transport as the number one priority including the upgrading of bus routes.

We note that Section 1.2 of the Expression of Interest (primary objectives of the scheme) does not mention public transport at all. Section 2.1 of the Expression of Interest states that the Council intends to remove and reduce some of the key bus

transport improvements from the scheme and in particular the variable message signs. This considerably weakens the claim that this scheme is about providing an integrated public transport system.

Furthermore, the BTP still has no clear strategy for moving buses through the city centre or along the congested London Road. Other factors such as fare pricing are not referred to at all. Putting these elements together, it is therefore difficult to see how this revamped BTP bid meets the NATA criteria.

The Council's attempt to reduce the cost of the BTP and attract government funding involves sacrificing valuable public transport elements of the bid in order to retain the costly, and controversial, segregated element of the BRT which clearly does not represent value for money. It is questionable whether the improvement of public transport is still the number one priority for B&NES Council.

4. Relationship between the segregated part of the BRT and the Western Riverside Development

Section 1.7 of the Expression of Interest document makes some very wide-ranging claims for the additional benefits the BTP will bring. These include

- in excess of 100,000m of leisure and business space
- up to 6000 jobs
- over 3000 homes of which 1000 will be affordable
- re-development of city centre car parks

These figures were not included in the original business case and to claim that all these benefits are achievable as a direct result of the implementation of the BTP are an exaggeration. An increase in jobs, for example, will depend as much on the overall improvement in the national economic situation as the BTP.

Construction of housing on Western Riverside has already commenced and other developments are in the pipeline. The claims in the Expression of Interest are not evidenced and should be viewed with extreme caution as they are being actively used to drum up support for the BTP in the business community.

Clearly, the WRD requires a link road into town and a means to bring commuters to new businesses in the area. However, this does not have to be via the expensive and destructive BRT. Our

alternative scheme, with a roundabout at the Lower Bristol Road end of Windsor Bridge, would provide a speedy and accessible link. We also think that better use could be made of rail links for the WRD, which is within easy walking distance of Oldfield Park train station.

5. The BRT is not an integrated element of the West of England Major Transport Scheme

The West of England Partnership shows the Bath BRT (see fig 1 below) as an integrated element of the regional Major Transport Scheme. However, it is not linked into a wider regional public transport network but is an isolated element. This becomes evident if we remove existing rail and bus links from the diagram (see fig 2 below). By definition, rail and bus users will not be using the Park & Ride or the BRT.

Fig 1: Major Transport Scheme diagram as published by West of England Partnership

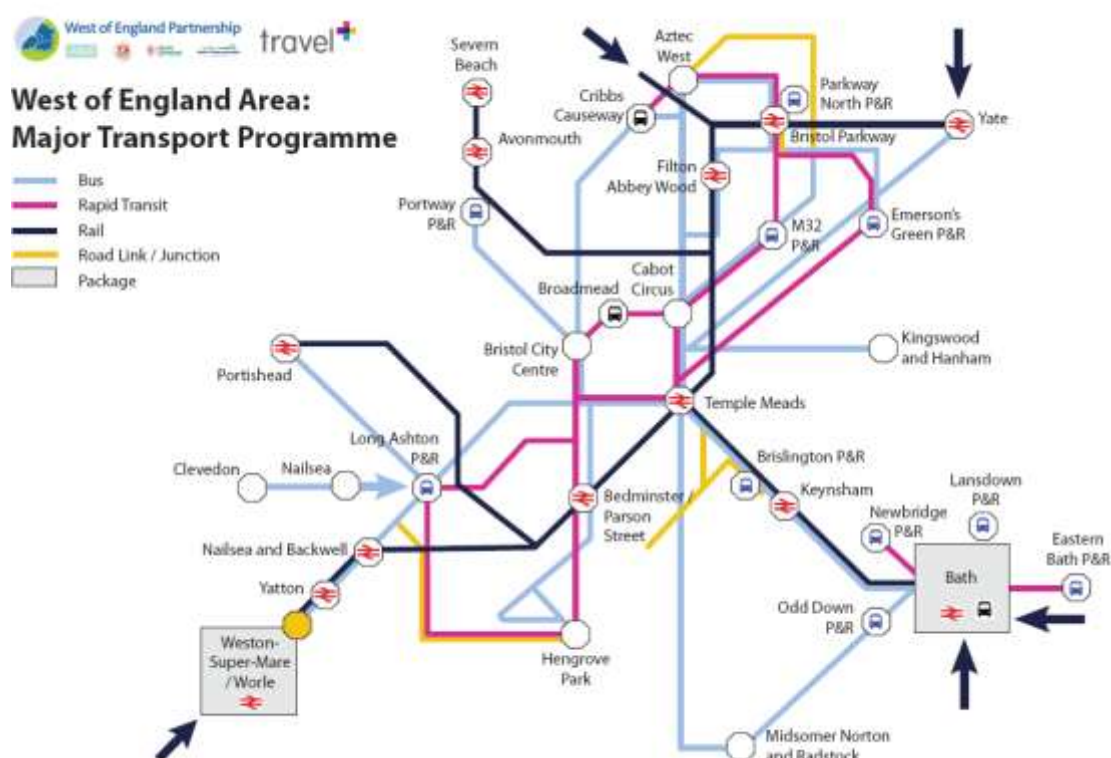
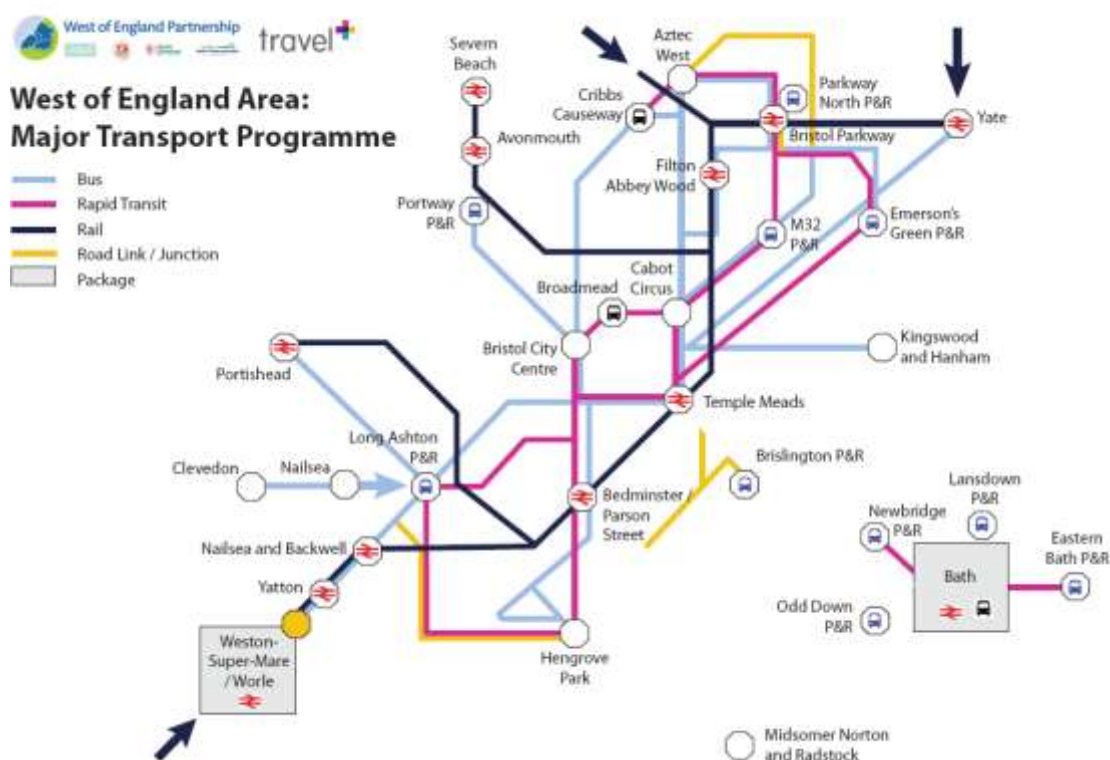


Fig 2: The same diagram with existing bus and rail routes removed



The Bath BRT is clearly a separate route which simply links the east and west of the city independently of the rest of the scheme. This linkage can be achieved without the segregated BRT route and with no impact on the rest of the Major Scheme.

Conclusion

Taking into account the wealth of evidence against the proposal, and BANES providing no data to back up the alleged benefits, it is unsurprising that it took them three attempts to get the scheme passed by their own planning committee. They only succeeded on the third attempt by stating that if the BRT / Newbridge P&R element was not approved then Bath would lose the central funding for the entire BTP. On that occasion the BRT/Newbridge P&R was not discussed per se, as the discussion was entirely focused on not losing the funding. Their lack of evidence and the points we raise above should be enough to demonstrate that this scheme is not the most effective use of taxpayers' money.

We have attempted to engage in a constructive dialogue with B&NES Council to try to modify their bid so that it delivers a better traffic and transport solution at reduced cost. The Council has failed to respond and therefore we feel that we have no choice but to oppose this current Council submission.

We would be pleased to meet with representatives from the Dept of Transport to discuss these issues further and to provide additional information.

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Response2 Route and Newbridge Matters would like to acknowledge the advice provided by Alan James – Environmental Transport Consultant