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For the attention of Local Plan Consultation team

local\_plan2@bathnes.gov.uk

17<sup>th</sup> February 2021

Dear Sir or Madam

### **Local Plan Options Consultation**

Please find attached the Railfuture response to the above Consultation. Our comments are cross-referenced with the numbered paragraphs in the Core Strategy and Placemaking Plan.

We understand that the partial update of the Local Plan has arisen because of your Council's declaration of a Climate Emergency. This has obvious implications for transport, so our comments relate mainly to Transport and Travel policies. In the Partial Update consultation document, Policy ST4 (Rail Freight Facility) is retained without amendment and this is welcomed by Railfuture. However, there does not appear to be specific mention of other existing Sustainable Transport policies, either as unchanged or proposed amendments, so I have commented on these, referencing them by their page and paragraph numbers in the Core Strategy and Placemaking Plan.

If anything in this response requires clarification, please let me know.

Yours sincerely

***Nigel Bray***

Nigel Bray  
Railfuture  
Secretary, Severnside Branch

[www.railfuture.org.uk](http://www.railfuture.org.uk) [www.railfuturescotland.org.uk](http://www.railfuturescotland.org.uk) [www.railfuturewales.org.uk](http://www.railfuturewales.org.uk)  
[www.railwatch.org.uk](http://www.railwatch.org.uk)

## **Promoting Sustainable Transport (pages 211-235 of Core Strategy & Placemaking Plan).**

### Climate Change and Air Quality (page 213, paras. 589, 590)

It is concerning to read that Bath, Keynsham and Saltford all have Air Quality Management Areas. This makes it all the more important that enhancements to public transport which attract motorists from their cars are introduced as soon as possible. Buses have generally not achieved much modal shift away from cars and would still cause pollution from tyre and brake dust. Although trams and trains have a higher initial capital cost than buses, their whole life cost is lower because of their longer lifespan and because they require fewer drivers to carry the same number of people.

Nottingham, which has an extensive tram system, enhancements to heavy rail such as the reopened Robin Hood Line and a workplace parking levy in the city centre, has not required a clean air plan, an unusually good state of affairs for a major UK city. We believe that Bath & North East Somerset would greatly benefit environmentally, commercially and in terms of public health, from a tram or light rail network.

### Promoting Sustainable Travel (pages 214, 215)

Railfuture strongly supports better integration between transport modes. The proximity of Bath bus station to Bath Spa railway station is an excellent example of interchange between bus and rail services. We welcome the intention in para. 596 to improve bus connectivity with enhanced train services at Keynsham.

We support Policy ST1 and note that clause 1 appears to encourage integration between sustainable modes. Gloucestershire County Council has produced Station Development Plans for each of the nine national rail stations in the county, with a view to encouraging access to the stations by sustainable modes and addressing any physical or psychological barriers to greater use of the stations.

### Sustainable Transport Routes (page 215, paras. 600, 601)

Former railway routes should also be considered for reinstatement as railways or as part of a tram network. The former Midland route via Weston might be suitable for light rail.

Reopening of the Radstock-Frome railway when funding permits should be specified in the Plan as it would help the economy of Norton-Radstock by attracting visitors.

### Recreational Routes (page 216, paras. 602-605)

We would like to see existing and future railway stations included in the designation of recreational routes. Most rail journeys involve an element of walking and stations should be seen as gateways to walks, eg from Keynsham to Bitton and the Avon Valley heritage railway. Freshford has a good train service (normally hourly) for a rural location.

## Transport Infrastructure (pages 217, 218)

With road transport accounting for 32 % of West of England CO2 emissions according to the JLTP3, this section is outdated because paras. 607 and 608 specify only highway projects. The mass transit system under discussion between WECA and Bristol & Bath Area Trams Association needs to be included. Also the Plan should include support for completion of the deferred Great Western electrification from Chippenham via Bath Spa to Bristol Temple Meads.

## Saltford station (page 219)

Railfuture strongly supports the proposed reopening of Saltford station as it would greatly improve journey times from the village into the centres of Bath and Bristol, as well as to other local destinations already served by rail. It would also become the nearest station to Bath Spa University.