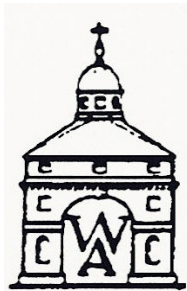


Widcombe Parade / A36 Rossiter Road Proposals

RESPONSE

By

The Widcombe Association



**ROSSITER ROAD SCHEME
RESPONSE BY THE WIDCOMBE ASSOCIATION**

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ROSSITER ROAD SCHEME

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SUMMARY

In this report we examine, in detail, a number of important aspects of the proposed scheme. For convenience, these are summarised in this section.

Subject to the comments and recommendations below, the Widcombe Association strongly supports the proposed scheme.

Rossiter Road and Widcombe Parade are within the Bath World Heritage Site (WHS), the Bath Conservation Area and on the edge of the study area for the Public Realm and Movement Strategy for the Bath City Centre so the Association considers that:

- The design quality of all parts of the scheme should be consistent with the World Heritage Site Management Plan 2010-2016
- The standards of urban design quality, implied by policies on conservation areas within the Local Plan, should be applied to the scheme
- The Public Realm and Movement Strategy should be central to the design philosophy for the scheme.

Regarding traffic engineering issues, we recommend, if possible:

- Provision of a right turn from Rossiter Road into Lyncombe Hill
- A trial of temporary traffic signals (or none) at the White Hart junction.
- Reconsideration of the short stretch of cycle lane within the carriageway on the north side of Rossiter Road.

Regeneration of Widcombe Parade has always been our key objective for this scheme so we urge the Council to:

- Prepare an urban design strategy for Widcombe Parade, to be carried out in parallel with the detailed engineering design.
- Landscape the area to the west of the Parade and include tree planting (to which the Association is willing to contribute)
- To design the area in front of the White Hart as a public space, not just a traffic junction
- Consider a more sympathetic approach to street lighting
- Minimise the extent of street signing and road marking

There is an opportunity for the Council to invest in the stimulation of this important local centre.

We are keen to ensure the design of the scheme, overall, is to the highest standards and are anxious to engage with the Council to help achieve this. The WHS Management Plan includes an objective “*to ensure that all traffic, transport and pedestrian management schemes enhance the value of the Site*”. In our view, the scheme does not meet this objective. We therefore ask that:

- An urban design input be included as part of the final detailing of the scheme
- The need to fell mature trees is carefully re-considered and if necessary compromise to some degree the engineering standards that have been applied.

An end date for the public consultation needs to be set and a firm project plan produced, incorporating provision for Widcombe Rising in June 2012.

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1. INTRODUCTION

This document is the formal response by the Widcombe Association to the Public Consultation on the proposed Rossiter Road scheme. The Association is the largest Residents' Association in Bath and is unique in having Business as well as Household members. Current paid-up membership is some 355 households (609 adult members) and 45 businesses, of which 25 are located on Widcombe Parade; we consider that we are the organisation best placed to speak on behalf of the Widcombe community. (Visit: www.widcombeassociation.org.uk to obtain more information about the Association's activities)

The Association was originally formed some 30 years ago to campaign for the Rossiter Road scheme although, over the years, its function has widened to cover all normal aspects of a community association. At all times, our objective for the Scheme has been one of urban renewal; to enhance the environment of our "village street" by a substantial reduction in noise and air pollution and by a significant improvement in the public realm. By making the "high street" a more attractive place in which to live, work or visit, there will be a substantial benefit for the local community and economy. Overall it is the Association's view that it is essential that this scheme is not viewed simply as a traffic engineering exercise.

2. CONTEXT

The proposed scheme for Rossiter Road must be seen within its context of one of the most outstanding urban environments, not just in the United Kingdom, but worldwide. The scheme is within the Bath World Heritage Site, the Bath Conservation Area, and is on the edge of the study area for the Public Realm and Movement Strategy for Bath City Centre.

2.1 The World Heritage Site

The Council recognises that "*The World Heritage designation is a tremendous accolade for Bath*" and that "*with such recognition comes responsibility to protect and maintain the site to the highest standards*".

Two months ago the Council approved the World Heritage Site Management Plan 2010-2016 for submission to UNESCO. In that document, the Council pledges that "*Bath will be a centre of excellence for urban heritage management and conservation*". There is particular emphasis on the quality of the public realm as one of the main themes of conservation.

In the document the Council undertakes "*to ensure that the public realm is seen as, and is understood to be, a significant historic and cultural element of the Site, and that alterations are of a high standard to take this into account*". The Management Plan further undertakes "*to ensure that all traffic, transport and pedestrian management schemes enhance the value of the Site*".

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The Widcombe Association expects the design quality of all parts of the scheme to be consistent with these statements in the Council's World Heritage Site Management Plan 2010 – 2016.

2.2 The Bath Conservation Area

Any project within the Conservation Area is required to maintain or enhance its quality. Indeed, in the current statutory Local Plan (adopted 2007), the Council states that it is committed to the preservation and enhancement of conservation areas. The Local Plan states *“an important aspect of the character and appearance of a conservation area stems from the treatment of boundary walls, railings, fences and the materials and surface finishes to paved areas....”*

The Bath Conservation Area is the most significant within B&NES, and the designation of the conservation area is a major component of the Council's strategy to maintain and promote the City's World Heritage status.

The Association expects the Council to apply to the design of the Rossiter Road scheme the standards of urban design quality that are implied by its policies on conservation areas contained within the Local Plan.

2.3 Public Realm and Movement Strategy for Bath Centre January 2009

In January 2009, the Council published a public realm strategy for the City Centre (*“Creating the Canvas for public life in Bath – a public realm and movement strategy for Bath City Centre”* – consultation draft). The document *“recommends a radical and hopefully inspirational plan for the transformation of Bath's urban environment”*.

Widcombe is on the edge of the area covered by this document. Nonetheless, the design principles set out in the report are ones that should be applied to the Rossiter Road scheme. Rossiter Road is adjacent to the river, immediately to the south of the City Centre. It is used to access the City Centre. Four of the seven gardens in Bath on the national register of Historic Parks and Gardens, including Prior Park, are in Widcombe. Thus many visitors to Bath will pass along Rossiter Road and through the Parade to gain access to them. It is thus an integral part of the centre of Bath.

This document underlines the Council's commitment to raising the quality of the public realm and rebalancing Bath's movement and spatial structure. It should be central to the design philosophy that is applied to this scheme.

3 ENGINEERING DESIGN ISSUES

Widcombe Association fully supports the proposed traffic management scheme that will remove through traffic on A36 from Widcombe Parade. We have some comments on the detail of the traffic engineering design that we believe could improve the scheme.

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The principal issue that has been raised with the Association is the lack of a right turn from Rossiter Road towards Lyncombe Hill. Comment has been made, largely by residents on, and adjacent to, Lyncombe Hill and Greenway Lane, and opinions are divided. The advantage of a right turn is convenience for residents. The alternative is to drive through the Parade and return along Rossiter Road from the east, passing through four sets of traffic lights. This puts additional traffic along the Parade, on Pulteney Road, and at the junction by the hotel with consequential increase in pollution. It can be argued that this compromises the main aim of the scheme. Residents in Lyncombe Hill and Greenway Lane make this manoeuvre at the present time, but in the reverse direction. However they negotiate three sets of pedestrian lights, not four sets of junction lights.

The objectors to a right turn are concerned that making access to Lyncombe Hill too easy will attract additional traffic cutting through to Entry Hill and Wellsway. The Association is not convinced by this argument. However we believe that there is a problem in achieving a satisfactory engineering design to accommodate the turning movement. The design that we were shown (privately) at the exhibition looks clumsy and would lead to a large expanse of engineering works. In practice, Widcombe Association would be in favour of a right turn towards Lyncombe Hill if it can be designed more elegantly (in both engineering and urban design terms). Perhaps a tighter design would be possible if the turn was to be limited to light vehicles only, with heavy vehicles, such as waste lorries and furniture vans, being required to access via Widcombe Parade.

The second area of concern is the junction at the foot of Widcombe Hill and Prior Park Road (the White Hart junction). The Association's preference would be to have no traffic light control at this junction. We understand the Council's arguments for having traffic lights in place related to problems, at peak periods, of traffic backing-up along Widcombe Parade and possibly affecting the operation of the Churchill roundabout. We believe the Council's concerns are unjustified given the limited extent of queuing that occurs at present from Rossiter Road into Pulteney Road. We would like further consideration of whether or not traffic lights are necessary at this junction. We have discussed with the Council, in the past, the possibility of having a trial, either with no lights or with temporary lights, to determine if the junction can operate without them.

The main advantage of having no lights at this junction would be a considerable saving in cost. There are also urban design benefits that are considered below. We believe, too, that the Council should take into account the actions of other local authorities that are preparing schemes to remove traffic lights at busy junctions.

The Association supports the provision of a cycle route through the service area to the north of the Parade. We do query, however, the provision of the short length of cycle lane within the carriageway on the north side of Rossiter Road between the Ha'penny Bridge and the entrance to the path alongside the river. The sudden introduction of a short isolated cycle lane will be confusing to motorists and give cyclists a false sense of security.

We have no comments on the junction at the eastern end of the scheme by the hotel.

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4. WIDCOMBE PARADE

The Widcombe Association has always promoted this scheme as a regeneration project. The Parade is one of the Georgian developments outside the City Centre that is referred to in the World Heritage Site Management Plan. It is an important local centre with a number of specialist businesses that serve the wider community. There is also a significant resident population. All of these will benefit from the removal of through traffic, especially heavy goods vehicles.

The Parade has long been identified as having high levels of air pollution, well above the statutory safe levels. In 2005 the Association took independent advice on the likely effect of the scheme and it was confirmed that the removal of the through traffic would bring a significant improvement in air quality along the Parade, to levels within those considered to be acceptable.

The treatment of the Parade that was displayed at the exhibition was a traffic engineering scheme only. There was no indication of changes that could be made to enhance the quality of the physical environment in order to take full advantage of the opportunity for regeneration. The Association urges the Council to prepare an urban design strategy for Widcombe Parade to include the space in front of the White Hart at the eastern end, Widcombe Parade, and the space at the western end between Spring Garden Road and Lyncombe Hill. This work should be carried out in parallel with the development of the detailed engineering design. The reason for this is that, within the engineering contract, work will be carried out in these areas to amend kerb lines and to pave or re-pave footways. There will also be new signing and, hopefully, new street lighting. Although a full urban design scheme could not be fulfilled within the engineering contract, any work that is carried out ought to be consistent with a longer-term strategy.

We have some detailed observations on the scheme as it affects Widcombe Parade:

- Firstly, it is not clear how it will be possible to provide parking on both sides of the Parade without narrowing the footpaths. Whilst we welcome the additional parking, the footpaths are not particularly wide at the present time; where they do widen out, due to the alignment of building frontages, they are used by the pubs and cafes for sitting-out. It would be hoped that this would be further encouraged, not restricted by narrower footpaths.
- Servicing bays should be provided on both sides of the road. Care should be taken to locate these, and bus stops, in order to avoid locations that are used by pubs and cafes for sitting-out. We would also suggest that the dropping-off point for the station should be on the south side of the Parade, at the western end before the buildings begin.
- The urban design strategy should identify the range of materials that should be used including kerbs, paving, road surfaces and street furniture. Details of the transition from pavement to carriageway should be included.

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- The treatment of the area to the west of the Parade will depend on whether or not a right turn to Lyncombe Hill is incorporated. With or without the right-turn, there will be a substantial area available for landscaping which should include tree planting. A number of existing trees are likely to be lost as a result of the engineering works, and this area provides the opportunity to replace them. This area should be designed as the entrance to the Parade from the west, and trees would provide a background to the view along the Parade from the east. The Association has offered to help in the provision of trees, both to replace those that are lost, and to provide others to enhance the quality of the environment.
- The area in front of the White Hart has the potential to be an attractive urban space overlooked by the spire of St. Matthews. Whilst it will remain an important junction for distributing traffic to and from Prior Park Road and Widcombe Hill, the total number of vehicles passing through it will be substantially reduced. This is why the Association urges the Council to re-think its approach to the control of traffic at this point. This area should be designed as a public space, not just a traffic junction. Careful design of the road surface could add to the success of this space.
- At the present time the lighting along Widcombe Parade is consistent with the requirements of a primary route – tall lighting columns set against the building facades with the lanterns at eaves height. We urge the Council to consider a more sympathetic approach to street lighting as part of the overall urban design strategy, perhaps with wall mounted lights.
- Traffic signs and road markings add significantly to the amount of street furniture, and can distract significantly from the quality of the urban environment. As part of its design approach, we ask the Council to seek to minimise the extent of street signing and road marking. Widcombe already suffers from some particularly bad examples of excessive signing and road marking, and the Association hopes that this scheme will demonstrate a more sympathetic approach.

5. OVERALL URBAN DESIGN

Although our principal concern is for the quality of the environment along Widcombe Parade, we are also keen to ensure that the design of the scheme overall is to the highest standards. The Council is the custodian of one of the world's most celebrated cities. It is incumbent on the Council to ensure that any change within the conservation designations meets the highest quality of design. Indeed, the Council's policies on the World Heritage Site and the Bath Conservation Area stress the importance of applying the highest standards of design within these areas. This is made clear in section 2 above. The Management Plan for the World Heritage Site approved by the Council at the end of 2010 stresses, in particular, that it is an objective “ *to ensure that all traffic, transport and pedestrian management schemes enhance the value of the Site*”.

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In the Association's view, the detailed development of the scheme needs to meet this objective. We have dealt with Widcombe Parade in section 4 above. However, the same principles should apply to other parts of the scheme in Rossiter Road. As presented, the scheme is a piece of pure traffic engineering design. To meet the Council's own objectives it requires to be considered as a piece of urban design. An urban design input must be included as part of the final detailing. We urge the Council to take heed of the recent advice, endorsed by the Department for Transport, in Manual for Streets 2 (September 2010). This advice, applicable to non-residential urban roads such as Rossiter Road, encourages local authorities to take a more holistic view of road design within urban areas. This approach is consistent with the Council's avowed aims for the World Heritage Site and the Bath Conservation Area, and is in-line with the Council's Public Realm and Movement Strategy.

As part of this approach we ask the Council to consider carefully whether or not there is a need to fell mature trees adjacent to the scheme. We understand that the scheme is designed to meet the most exacting engineering standards, perhaps more so than any other part of A36 through Bath, and possibly in excess of DMRB standards. We request that the Council examines each instance where felling is proposed with a view to retaining as many as possible, even if there is some degree of compromise with the engineering standards that have been applied.

The Rossiter Road scheme is a high profile project that will have a significant visual impact on the City. The design that we have seen does not meet the standards set by the Council's own policy documents. It is the view of the Widcombe Association that there is a need to enhance the basic traffic engineering design by the application of good urban design practice. There is an acknowledgement in the World Heritage Site Management Plan that Bath's public realm has declined gradually over decades. There is a danger if this scheme is not refined with urban design input, that the quality of the public realm could be further eroded. Conversely, we believe that this scheme provides the opportunity to demonstrate good practice in blending traffic management with good urban design.

6. PROJECT PLANNING

There are a number of questions to be answered regarding the planning of this project. We have, in the past, seen copies of Gantt charts but these are clearly no longer applicable. We would therefore welcome sight of a revised project plan, representing a firm programme for the scheme, at the earliest possible opportunity. In particular, the plan must address:

- End date for consultation – a date must be set for finish of the consultation which, we suggest, should be within the next 10 days. We would welcome an opportunity to see the results as soon as possible thereafter.
- Timing of the construction phase, which must ensure that Widcombe Rising, in June 2012, is not affected.

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7. CONCLUSION

We strongly support the proposed scheme and wish to see it implemented at the earliest possible opportunity. We believe that the consultation has been widely publicised and that it is likely to have been representative. The next step must be conclusion of the public consultation exercise, which, in our view, should be within the next 10 days. We are not aware of any significant body of opinion that should prevent the scheme being taken forward at the earliest possible opportunity. There is an urgent need to develop a firm programme, which should incorporate urban design input prior to finalising detailed design. The Association would welcome the opportunity to provide input to this aspect of the project. We appreciate that to implement all our suggestions would require additional investment in the regeneration of this important local centre. However, we would not wish consideration of this to delay implementation of the Rossiter Road scheme. If there are any issues that are likely to lead to delays, please notify us immediately so we can discuss them with you.

The Association greatly appreciates the efforts made by council members and officers to bring this challenging project to the consultation stage and hopes that we shall soon move to the delivery phase!

Richard Wales

F.R. Wales
Chairman
The Widcombe Association

14 March 2011