



The Widcombe Association

www.widcombeassociation.org.uk

Jeremy Boss, Chairman

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For the attention of

16 May 2017

Mr. V. da Cunha
Chief Executive
Curo
The Maltings
River Place
Lower Bristol Road
Bath
BA2 1EP

Dear Mr da Cunha

South Bath Transport Options

The purpose of this letter is for our association to make its views clear to Curo on the South Bath Transport Options public consultation. As you are probably aware the Widcombe Association (WA) is the largest residents association in Bath and has over 400 households and 50 local businesses and organisations amongst its members. More detail can be found at www.widcombeassociation.org.uk. The WA formal position has been based on surveying and speaking to members about their views. In addition, we have encouraged individuals to respond directly to the consultation at the exhibitions or on-line.

The Widcombe Association wishes to express in the strongest terms its opposition to the proposal in principle for a cable car linking the new development of Mulberry Park to the city centre. Despite the lack of a defined route, it is clear that any of the likely alignments will be almost entirely through Widcombe. Only the two docking stations would be outside the Widcombe boundary.

Our main concerns relate to the impact on Bath. Four major designations have been put in place to protect the environment of the City: the Bath Conservation Area, the City's UNESCO World Heritage Status, the Green Belt and the Area of Outstanding Natural Beauty. As you are aware, your proposal would impact directly on all four. Although Arup's baseline report (2017) provides a thorough explanation of these designations, it fails to consider the effect of the proposed cable car on them. It is our view that the construction of the cable car, the pylons, wires and docking stations, would have damaging impact both on the built-up city and its setting which is a key part of the WHS designation.

You state that you are promoting the cable car to address the transport problems of Bath. Any solution must be within the context of a strategy for the whole city, this proposal is not. No evidence is provided of the amelioration that the system would provide, and we believe that the cable car would provide little, if any, benefit in relief from traffic congestion. The parts of the city that experience the worst congestion are on the east-west axes and the routes from the north. The cable car would provide no relief in those areas. In south Bath it is likely that the cable car would lead to greater levels of traffic, not less. The cable car would attract commuters and visitors from outside Bath (from the south) who would wish to park as close as possible to the docking station. In the absence of a car park adjacent to the docking station, they would seek to park in adjacent roads within Mulberry Park, Foxhill and other parts of Combe Down. Foxhill could become a transport hub, not something that either existing residents or prospective purchasers in Mulberry Park would welcome.

Finally, on the transport issue, we would point out that Curo's own transport consultants for the two planning applications (Foxhill and Mulberry Park) concluded that the area would be well served by public transport. For the Mulberry Park application, for example, FMW stated in the Transport Statement Addendum (Dec. 2014) *"it is considered that the site will provide a very good public transport service, allowing the potential for it to offer a serious alternative to private car trips"*. The Council was clearly in agreement with this when it granted planning permission for the Mulberry Park development. The Transport Assessment for the Foxhill redevelopment (Vectos Oct. 2016) states that *"bus services (a bus every 9 minutes) provide convenient access to Bath City Centre."* Thus, on the basis of your transport consultants' reports there is no justification for the cable car arising either from the development of Mulberry Park or from the re-development of Foxhill.

I turn, now, to the more direct impact on Widcombe. As you may imagine, many residents in Widcombe are extremely concerned by your proposal. Whichever route is eventually selected, the cable car will over-sail people's homes. There is concern about loss of privacy and the visual intrusion of such a system. These are not issues that can be lightly set aside with offers of compensation. You are potentially damaging the quality of life of people who will themselves get little if any benefit from the cable car. There are also concerns about loss of property values, and there is anecdotal evidence that this is already occurring. Should you proceed, you can expect to have to pay compensation not just for air rights, but also for injurious affection along a broad corridor either side of the selected route.

We also have concerns about process. From statements you have made, we understand that if Curo proceeds with the scheme, the application to the Secretary of State under the Transport and Works Act will include both the application for the Order to build and operate a guided system and the application for planning permission. As you will be aware, you have the option to apply for planning permission from the local authority in advance of your application for the Order. You should also be aware that, as a private promoter, your approach is contrary to the clear advice set out in the guidelines issued by the Department for Transport. Given the very high cost of taking the application for the Order to the Secretary of State, private promoters are advised to reduce their exposure to risk by securing planning permission first from the local authority. At the very least, an application to the Secretary of State should have the support of the local authority. The inference in the guidelines is that without that support, an application would fail.

One of the major problems we have with Curo's approach is the lack of transparency. We must assume, from the claims made, that you have completed substantially more work than you are willing to divulge. For example, in the Options Report, assertions are made that "feasibility work suggests a cable car is deliverable and practical" but no evidence is provided. We submitted a list of questions to which you replied, but the answers were bland and uninformative. This is not a sound basis on which to make a judgement on a proposal that could inflict significant harm on the city and many of its inhabitants.

Finally, we wish to question the legitimacy of the "consultation" process that is shortly coming to an end. It purports to be an exercise to consider the options for improving transport to and from south Bath. In practice it has been an event to promote the cable car. The exhibition boards and the accompanying reports are focused largely on the cable car, with little if any emphasis on the other options. The feedback form is skewed totally to securing approval from respondents for the cable car. As a public consultation exercise we doubt this would stand up to scrutiny either by the Secretary of State or at public inquiry.

We hope that Curo will publish the results of the feedback as soon as possible. We have carried out a survey of our own members which shows that approximately 80% are opposed to the cable car. We are also aware of the very strong feelings against it amongst residents who are potentially affected and who have formed their own protest group. We note that all four prospective parliamentary candidates at the hustings last night clearly stated they were opposed to the cable car proposals.

The cost to Curo of this whole exercise must have been considerable, justified only by a very wide interpretation of your core charitable and social purposes. As the principal social landlord in the City you may feel that it is important to retain the support and respect of the residents of Bath. In conclusion, therefore, we hope that you will reconsider your intention to proceed with this project.

We would be pleased to discuss with you any of the issues raised in this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Boss', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeremy Boss

cc Liz Potter, Curo Group Chair
Vicky Windsor, Creatrix