

## **Listed Building Application 20/01893/LBA – Cleveland Bridge**

### **Covering note to Cllrs Wright and Butters**

I attach for your consideration the comments by the Federation of Bath Residents' Associations (FoBRA) on the Listed Buildings Application for the repair of Cleveland Bridge, as they largely concern transport matters.

FoBRA strongly advocates a permanent weight limit on Cleveland Bridge on completion of the repair works. This is the key to reducing traffic throughout Bath as well as in the immediate area, and protecting the World Heritage Site (WHS). We urge the Council to engage with the Department for Transport to seek the removal of the A36-A46 from the national Strategic Route Network. This route through the middle of the WHS is wholly unsuitable to be a major trunk route.

We understand that the Council as Highway Authority will address separately the arrangements for traffic diversion during the period the bridge is closed for repairs, and we trust that FoBRA will be consulted as an important stakeholder which represents many Bath residents. At this stage, we would just like to point out that the diversion arrangements set out in the previous LB application (WSP Report Volume 3) were unsatisfactory in a number of respects.

The map at Annex B of the WSP report proposed that the 'Bath City Centre Diversion Route' would be the main diversion route for LGVs and cars. This would result in a huge increase in the number of LGVs and cars passing through the city centre for the months that the bridge is under repair, adding greatly to the already high levels of traffic congestion and air pollution in one of the most sensitive parts of the World Heritage Site, including one of its Key Elements (Queen Square). It would wreck the Clean Air Plan, which is already finely balanced, with little margin of safety and with special measures already required at Gay Street/Queen Square. Other residential areas could also be affected.

This plan should be urgently reconsidered. This traffic (particularly LGVs) should be directed to use alternative diversion routes which avoid the city altogether (as for HGVs). The diversion plan should exclude any reference to the city centre as a diversion route for LGVs and cars.

The 'Bath City Centre Diversion Route' (Figure 6.1) was apparently intended for HGVs coming from the A36 south to access the centre for deliveries. However, other HGV drivers going north-south or vice versa would be tempted to take this 4.5 mile diversion rather than the longer alternative diversion routes. The only thing to stop them is the 7.5 tonne HGV weight limit through the city centre. This will need to be rigorously enforced for the duration of the bridge closure to prevent the use of the city centre by large numbers of heavy lorries.

It would be useful for the Council to engage with the road haulage industry to point out the deficiencies of the route through Bath and discuss their experiences of using the diversion routes during the past few months.

copy: Cllr Sarah Warren

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### **Comments by the Federation of Bath Residents' Associations (FoBRA)**

1. In the weeks before the coronavirus lockdown, the temporary HGV weight limit on Cleveland Bridge dramatically reduced HGV traffic, resulting in a transformation of London Road and Bathwick Street. Traffic flowed much more freely. Air quality was substantially improved. Noise and vibration was greatly reduced, with particular benefit in the early morning when many HGVs travel and the impact is magnified by the lower levels of background noise. The relentless noise from the 'normal' level of traffic disrupts residents' sleep and poses a threat to mental and physical health, due to the close proximity to the roadside of some 1,500 properties. Many of these are Listed Buildings, where insulation against pollution and noise is difficult or impossible.

2. A permanent HGV weight limit should be imposed on Cleveland Bridge after the completion of the works. As well as benefitting the immediate area, this is essential to enable traffic to be reduced throughout Bath, including the historic core of the World Heritage Site, and to facilitate the introduction of Low Traffic Neighbourhoods. We have recently made proposals to B&NES Council leadership on this issue.

3. A permanent HGV weight limit would reduce the risk of damage to the bridge in the future. The Council should consider whether the scope of the planned repair work could be reduced if a permanent weight limit was put in place, reducing the repair costs and whole-life costs and lessening inconvenience during the period of the works. Refurbishment work should be limited to what is necessary for conservation of the bridge.

4. The Design and Access Statement betrays confused thinking about the significance of Cleveland Bridge in the national road system. Paragraph 4 of the Design and Access Statement states that:

"The structure connects London Road to Cleveland Place. The A36 is a trunk road and primary route in southwest England that links the port city of Southampton to the city of Bath. At Bath, the A36 connects with the A4 road to Bristol, thus providing a road link between the major ports of Southampton and Bristol."

In fact traffic from Southampton to Bristol, if it comes through Bath, does not use Cleveland Bridge; it uses the A36/Lower Bristol Road to connect to the A4 west to Bristol. Bath itself is not a major destination for goods from the port of Southampton. The statement also ignores the existence of the M3-A34-M4-M5 as a much more suitable and faster route for HGV traffic between the ports of Southampton and Bristol (and Wales and the West Midlands). North-south HGV traffic from the M4 is significant, but there are more suitable alternative routes such as the A350 or A34.

5. Cleveland Bridge is not part of the national Strategic Route Network (SRN) and is therefore under B&NES's control. The SRN does however run from the M4 down the A46 to Bath and the A36 south east from Bath to Warminster, so in effect passes through the city at this point. This route is all single-carriageway, and the only part of the network which takes traffic through a conurbation without either a ring road, bypass or dual carriageway.

6. B&NES Council should discuss with DfT the replacement of this part of the SRN by a more suitable alternative route, in line with the statement in the Local Plan that "The Council

will work with neighbouring authorities, including Wiltshire Council, to address the problem of through traffic in Bath, particularly traffic that currently uses the A36-A46 route through the city and continue to press Highways England and Transport Ministers to take steps for solutions to be identified and funded in the next Road Investment Strategy to be published in 2020." (PMP Part 1, page 192, paragraph 582)

7. We understand that the Council as Highway Authority will address separately the arrangements for traffic diversion during the period the bridge is closed for repairs, so we will not comment on this in detail. However, it is an extremely important issue, and we must point out that the diversion of LGVs and cars through the city centre as proposed under the previous plan would have a major and unacceptable impact on the amenity and air quality of the area. The Council should direct *all* traffic to use diversion routes which avoid the city altogether (as for HGVs). It is also essential that the HGV weight limit through the city centre is rigorously enforced for the duration of the bridge closure to prevent the use of the city centre by large numbers of heavy lorries.

Patrick Rotheram, FoBRA Transport Lead

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