

Federation of Bath Residents' Associations

Response to Bath Clean Air Zone consultation October/November 2018

Key points

- B&NES must give the highest priority to the health of Bath residents and those working in the city, whilst meeting the legal requirement to reduce air pollution.
- B&NES should follow the precautionary principle and aim for NO₂ levels well below the legal limit in order to ensure compliance by 2021.
- A Class D CAZ by itself will not do the job, without effective traffic management. Two locations are forecast to be above the legal limit, others a little below.
- A Class D CAZ plus traffic management would offer the best chance of compliance, but a Class D CAZ would have a serious impact on residents, especially the less well-off and those living within the CAZ, and encourage unwelcome behaviours.
- The modelling shows only a small difference in the impact on air pollution of a Class C and a Class D CAZ. A Class C CAZ combined with traffic management might achieve compliance without the adverse impacts.
- Concessions, for example to taxis and coaches, should be strictly limited.
- The CAZ boundary should be extended in four locations.
- The CAZ is already raising important wider transport issues. There is an urgent need to develop a comprehensive Bath Transport Plan.

Type of CAZ

1. FoBRA members' top priority is to reduce traffic congestion and air pollution in Bath, and we welcome the requirement placed on B&NES to reduce air pollution below the legal limit as soon as possible. The health of Bath residents and those working in the city must be B&NES's highest priority, overriding any other impacts of the CAZ.

2. In view of the known elevated risks NO₂ and related pollutants pose to children, the need to achieve a major reduction in air pollution is particularly pressing where the main walking route to school for many children is along busy roads - both to prevent detrimental effects on the health and development of children currently walking, and to have any chance of achieving the objective that more parents will abandon the school run and encourage their children to walk to school.

3. We note that the AQ3 Modelling Report concludes that only a Class D CAZ will meet the requirement to bring NO₂ levels into compliance in the required timescale. However, even with a Class D CAZ, air pollution is forecast to remain above the current legal limit in two locations, and at high levels (>30 µg/m³ of NO₂) throughout much of the city. This is even before concessions for certain classes such as taxis, school coaches and Blue Badge holders. It leaves absolutely no margin of safety. Given the possibility of estimating uncertainties – previous forecasts of reducing pollution have proved to be grossly over-optimistic – B&NES should follow the precautionary principle and aim for NO₂ levels well below the limit in order to ensure compliance by 2021, to allow for future traffic growth, and to maximise the health benefits for residents and others. A Class D CAZ combined with traffic management measures would offer the best chance of compliance, although a Class D CAZ would have a serious impact on residents (paragraph 5).

4. Traffic levels at the forecast exceedance locations could be reduced by traffic management to reduce or prevent through traffic in the city centre (George Street and Queen Square). A comprehensive city traffic management plan would be required in order to deter rat-running in residential areas. More stringent control of visitor parking in the centre would encourage greater use of park-and-ride and reduce traffic volumes. These measures would be entirely in line with existing Council policies set out in the Core Strategy ('a largely car-free city centre'), the Placemaking Plan ('a city centre free of all but essential traffic'), as well as the Bath Transport Strategy ('reduce the intrusion of traffic, particularly in the historic core'), the Public Realm and Movement Strategy and the Bath Parking Strategy. Concessions, for example to taxis and coaches, will reduce the effectiveness of the CAZ and should be limited as far as possible.

5. The modelling shows only small differences in forecast NO₂ levels as between a Class D and a Class C CAZ, with a typical improvement of only 1 µg/m³, and in many cases no improvement. Therefore a Class D CAZ appears to offer little benefit over a Class C CAZ in terms of improved air quality. But it would have a serious impact on residents, especially the less well-off and those living within the CAZ, and significant negative welfare impacts overall. A Class D CAZ will require palliative measures, be more complex to administer, and encourage unwelcome behaviours such as rat-running and parking in residential areas on the edges of the CAZ. DEFRA has stated that ordinary working families who bought diesel vehicles in good faith should not be penalised. The Council is proposing to provide financial support schemes for residents and businesses that need it most, but no details have yet been offered.

6. A Class C CAZ is predicted to bring air quality into compliance at all but two locations (London Road west of the junction with Bathwick Street and George Street/Gay Street), and at these locations NO₂ levels are forecast to be only a little above the legal limit. Traffic and air pollution at Gay Street should reduce in any case when a ban on coaches in The Circus and the one-way system on Gay Street comes into force shortly. A Class C CAZ combined with traffic management might achieve compliance without the adverse impacts.

7. If the Council does decide to proceed with a Class D CAZ it should consider a scrappage scheme and a modest standing charge for residents within the CPZ similar to that in the London Congestion Zone as an alternative to a daily charge, for a limited period at least.

The CAZ boundary

8. We welcome the enlargement of the boundary of the CAZ in response to concerns about rat-running in residential areas. However, there are four areas where the boundary needs to be extended further:

a. Great Pulteney Street, Sydney Place and Sydney Gardens. The current boundary would allow higher emission cars and coaches arriving along the A36 to get into the centre of the city and drop off passengers on the doorstep of the tourist centre without paying the CAZ charge, making the area the destination of choice for visitors to the city with higher emission vehicles.

b. Bathwick Roundabout and part of the A36 to the bottom of North Road. Residents are concerned that lorries could continue to drive down Bathwick Hill and North

Road to the A36 (eastbound). Bathwick Estate including Beckford Road should be included.

c. The A367 Wells Road including the B3111 Oldfield Road, which became heavily trafficked when Brougham Hayes was closed recently.

d. Lansdown Crescent.

Generally, the Council will need to be alert for adverse impacts due to motorists finding routes through residential areas around the CAZ.

9. Parking may well become an issue on the boundaries of the CAZ and the Council should be prepared to address such problems through parking control. The Council should reconsider introducing parking control on Sundays (which would have the added benefit of encouraging the use of park-and-ride and so reducing traffic volumes and NO₂ levels).

Other issues

10. We welcome the proposed 'supporting measures'. We strongly support the proposed extended opening hours at the park-and-ride sites, with secure overnight parking. FoBRA has long called for these improvements.

11. We note the proposal to pursue the idea of smaller park-and-ride sites along existing bus routes. However this 'link and ride' concept remains unproven and we continue to believe in the need for a park-and-ride to the east of Bath. We are disappointed that this is not included among the supporting measures.

12. More generally, we believe that the introduction of the CAZ is focusing much-needed attention on transport issues in Bath. Already concerns have been publicised by the haulage industry. Concerns have been expressed about the impact of a Class D CAZ, particularly on low-income households and on businesses. The introduction of the CAZ will bring into sharp relief issues such as the need to provide viable alternative means of access to the city, improved public transport, the improvement of park-and-ride provision, freight consolidation and the provision of an alternative route for through traffic, particularly HGVs, that currently uses the A36-A46 route through the city. The Council should consider introducing school buses for all schools in Bath, both private and state, which would have a large impact on air pollution by reducing or eliminating the school run.

13. There is therefore a pressing need to develop a comprehensive Bath transport plan which addresses these issues. Bath's transport needs must also be included in the WECA JLTP4, particularly in view of WECA's responsibilities for public transport. B&NES's recently-announced 'Plans for future developments across Bath & North East Somerset' indicates a recognition of the need to consider the relationship between the CAZ and the Bath Transport Strategy, including additional park-and-ride provision. This is a welcome start, but in FoBRA's view it is a matter of the greatest urgency which must be addressed without further delay.

27 November 2018