

28<sup>th</sup> September 2014

Cllr Paul Crossley  
Leader, Bath and North East Somerset Council  
Guildhall,  
Bath BA1 5AW

Dear Paul,

### **A Low Emission Zone (LEZ) for Bath**

1. FoBRA would like to draw your attention to the paper on an LEZ for Bath which was presented to the Planning, Transport and Environment Policy Development and Scrutiny Panel on 16 September.
2. We were very pleased that the Panel considered a report on air pollution in Bath, as air pollution is one of our members' top concerns. The entire main road network in Bath, and many lesser streets, is in the Bath Air Quality Management Area (AQMA), which by definition means that levels of air pollution there are damaging to health and unlawful. Some 10,000 people live in the Bath AQMA and are suffering the effects of air pollution over the legal limit. The accompanying report on the health effects of air pollution made it clear how serious a problem this is for people living and working in Bath.
3. Authorities in the UK have been slow to tackle the problem of air pollution, perhaps because it is largely invisible and the impact is slow and insidious. However, the issue can no longer be avoided: the European Commission has launched a legal action against the UK, and in the Localism Act the Government has taken powers to pass fines on to the responsible local authorities.

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4. We have extensive monitoring of air pollution in Bath (although our members have some concerns about the coverage of this); we have an Air Quality Action Plan (AQAP); and an AQMA. However, of course, none of these by themselves reduce air pollution one bit. What we need is action to reduce air pollution.

5. We had placed some hopes in the proposal in the AQAP to study the creation of an LEZ, but the outcome of the study is disappointing. Options 1-3 considered various permutations on an LEZ in London Road and Bathwick Street. However the study made the assumption that there would be no diversion of HGV from these streets, and as a result of this assumption there was little reduction in pollution levels and these options were not judged to be viable.

6. In reality one would expect the creation of an LEZ to lead to the diversion of non-compliant vehicles to other routes. Sadly it is all too realistic to believe that B&NES cannot do anything which would directly result in HGV being diverted onto existing roads in Wiltshire, since this would be blocked by the DfT as was the proposed weight limit at Bathwick. The logical conclusion is that the only way to reduce pollution from HGV is to provide a new alternative route avoiding Bath, eg an A36-A46 link.

7. Option 4, an LEZ in the 'Central Area', does appear to be viable and something that the Council could take forward. We were pleased therefore to see that funding is to be sought for this. However it transpired at the meeting that the proposed LEZ would cover only a very small area around Dorchester Street. It would not cover such areas as George Street, Queen Square, The Circus or the Great Pulteney Street/Henrietta Street area, which are used by HGV including delivery vehicles and coaches. We believe that the LEZ should apply to the city centre as defined by the transport strategy: so we are seeking clarification that the strategy includes the Great Pulteney Street/Henrietta Street area.

8. There has been much scientific work and concern recently about the harmful effects of fine particulates ( $PM_{2.5}$ ). Two recent studies in learned journals, The Lancet and in the BMJ, have strongly reinforced our concern about particulates. The BMJ study assesses the increased risk of heart attack from city living at 13%. Fine particulates are not currently monitored in Bath and are not covered in the report. We think it is time for B&NES to begin monitoring  $PM_{2.5}$ .

9. Air pollution in Bath is mainly due to road traffic (93% of NO<sub>2</sub>). The only way to reduce it is by reducing traffic volumes. The only way of doing that is through a comprehensive transport plan. We hope that the Council will press ahead vigorously with this work. The eastern park-and-ride is a key part of the strategy and we were concerned about the recent report in the Chronicle which suggests that the timetable for this may be at risk.

10. I should be glad to talk about this proposal when we meet on 9<sup>th</sup> October.

Yours sincerely

Robin Kerr, Chairman