

BATH'S CLEAN AIR PLAN 2021

Response by Federation of Bath Residents' Associations (FOBRA)

1. We welcome this important step towards improving air quality in Bath. B&NES now has an excellent opportunity to address the traffic congestion and air pollution from which the city suffers.
2. It is essential to have a comprehensive plan covering the whole city. NO₂ air pollution affects the whole main road network in Bath and large parts of the city centre. It is not limited to 'several hotspots'.
3. Air pollution is inextricably linked to motor vehicle traffic, which generates 92% of the NO₂ in Bath. Air pollution should be tackled as part of an overall strategy aimed at reducing both pollution and the traffic congestion which blights the World Heritage Site, in line with the objectives of the Bath Transport Strategy, approved with all-Party support in 2014, the Core Strategy objective of a largely car-free city centre, and the Bath Public Realm and Movement Strategy, all of which are referenced in the CH2M consultants' report but not followed up. It makes no sense to tackle air quality in isolation from the broader objectives of these strategies. At the very least, furtherance of the Bath Transport Strategy and PRMS should be added to the Evaluation Criteria for the Clean Air Plan (CH2M Report paragraph 3.3.3, page 43)
4. FOBRA has long been advocating that B&NES should adopt a project management approach to transport planning, and this is what the CH2M report proposes at paragraph 6.2, page 70, for the Clean Air Plan. We hope that B&NES will implement this recommendation. The remit should be broadened to include transport strategy as a whole, as most if not all the measures that will be required involve transport.
5. FOBRA supports a central Bath CAZ (see below), but it is not the only way of cutting emissions and improving air quality by 2021. Vehicle movement and hence air pollution in the city centre could also be reduced quickly, effectively and cheaply by means of parking control and traffic management. This should include restrictions on coach access to the city centre and freight delivery management. The 'other measures' set out in the Council paper, particularly improving public transport, are essential. A park-and-ride east of Bath would help alleviate congestion and pollution. These should all be pursued as elements of a comprehensive plan.
6. FOBRA welcomes the creation of a city centre Charging Clean Air Zone (CAZ) as part of a suite of measures aimed at reducing traffic congestion and air pollution as soon as possible. It is essential to cover Class B, as buses and coaches are the major source of air pollution in parts of the city centre, and HGVs are a major source throughout. There is a large number of diesel vans coming into and through Bath and a Class C CAZ is needed at the least. Diesel cars are the principal source of air pollution in parts of the city centre and to tackle this a Class D CAZ may be required. This would have the most financial impact on city residents, particularly less well-off car-owners. Other means of limiting car access are available without charging, as described above.
7. We welcome the inclusion of the 'blue extensions' in the base CAZ now being proposed. This is essential in order to prevent the diversion of traffic and pollution onto nearby

residential streets. Individual Residents' Associations will discuss with B&NES the detail of the boundaries of the proposed extensions. Taking these together, a larger zone akin to the Council's 'medium' CAZ option may be preferable.

8. London Road has some of the highest NO₂ exceedances in the city and we welcome its inclusion in the base CAZ. A high proportion of NO₂ on London Road is generated by HGVs, most of which do not go into the centre but use Bathwick Street and the A36 south or west. In the longer term, providing an alternative route for the A46-A36 through traffic will significantly reduce air pollution along this corridor. It is essential that, as proposed, this CAZ includes the residential streets of Camden to the north, so that traffic is not simply displaced there.

9. Revenue from the CAZ and parking control should be applied to other transport measures such as improved public transport.

10. Any exemptions would reduce the effect of the CAZ and increase its complexity. The justification for any exemptions should be considered very carefully.

11. The Clean Air Plan should include enforcement against idling by lorries and buses, which is an offence against the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The bid for government money should include funding for more enforcement staff in this area.

12. We understand that the current proposals are required to address the legal exceedances of NO₂, but residents are equally concerned about the long-term health implications of particulates (PM₁₀ and PM_{2.5}). The plan should take this opportunity to create a comprehensive monitoring system in the city for particulates as well as NO₂.

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