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**FEDERATION OF BATH RESIDENTS' ASSOCIATIONS (FOBRA)  
RESPONSE TO CONSULTATION DRAFT BATH AIR QUALITY ACTION PLAN**

**General comments**

1. FOBRA believes that a major reduction in traffic coming into and through the city is essential if air pollution is to be significantly reduced. The Plan fails to bring forward adequate measures to achieve this. We believe that BANES should act now to reduce traffic in the city by measures such as an early HGV ban on Cleveland Bridge, reducing city centre parking provision, and traffic management measures which could include congestion charging. BANES should also actively pursue the creation of a north-south link to the east of Bath to avoid the need for through traffic to come into the city. FOBRA considers that these measures should be given a higher and more urgent priority within the Plan and in BANES's planning generally.
2. FOBRA has pointed out previously that while the Bath Transportation Package (BTP) is important in its own right and represents a vital first step towards tackling the problems of traffic and pollution in Bath, it is essential that BANES complements the BTP with other measures to reduce traffic coming into the city, to cut down on through traffic and to restrain visitor parking. We are disappointed that, other than the feasibility study into a Low Emission Zone, the draft Plan does not include measures aimed at reducing traffic. A number of measures which could do this are listed only as 'possible future actions' - outside the 3-year timescale of the Plan.
3. FOBRA notes with concern that air pollution in Bath remains above the safe health limit of  $40 \mu\text{g}/\text{m}^3$  of  $\text{NO}_2$  throughout the main road network in the city and that, after a slight reduction in 2007,  $\text{NO}_2$  levels in Bath in 2008 were at or above the levels of 2006 across most of the monitoring sites.
4. We note that the draft AQAP confirms that air pollution in Bath is almost entirely due to road traffic and that Heavy Duty Vehicles (HDV) make a major and disproportionate contribution to this air pollution.
5. We note that existing transport initiatives such as the BTP, the CIVITAS programme measures and increased car parking charges are expected to contribute to reducing pollution in Bath. We welcome the explicit recognition of the connection between parking policy and traffic and air pollution, but we consider that BANES should act on this logic by reducing visitor parking in the city centre.
6. The report makes no mention of the effect of air pollution on buildings, an issue of particular significance in a World Heritage City built mainly of soft limestone.

## Specific comments

7. Executive summary, 3rd paragraph, and para 2.2. We are surprised that the JLTP target is for NO<sub>2</sub> levels not to exceed 47 µg/m<sup>3</sup> by 2010, when the legal requirement under the Environment Act 1995 is that NO<sub>2</sub> concentrations should be below 40 µg/m<sup>3</sup> by 1 January 2010. Surely the target should be brought into line with the legal obligation?
8. Executive summary, penultimate paragraph. We believe that firm targets should be included in the AQAP for these items.
9. Paragraph 2.3, page 6. This appears to understate the adverse effects of NO<sub>2</sub>. According to the European Environment Agency, long-term exposure to nitrogen dioxide can induce irreversible changes in lung structure and function, while short-term exposure may result in airway and lung damage, decline in lung function, and increased responsiveness to allergens following acute exposure. While children may be particularly vulnerable, the adverse effects of long-term exposure are not limited to children as the draft suggests.
10. Section 3, page 8. We support the proposed extension of the AQMA to include upper Gay St, The Circus, Bennet St, Lansdown Road up to St Stephen's, James St West and Newbridge Rd. We suggest that the 70 m wide band from the centre of the main road should be applied to all the areas with very high NO<sub>x</sub> levels, not just to one section of the London Road.
11. Paragraph 4.3.1, page 16. On the basis of data elsewhere in the report, Widcombe High Street should be included in the second most polluted category, with a concentration of NO<sub>2</sub> in excess of 50 µg/m<sup>3</sup>.
12. Section 5. We suspect that the high levels of NO<sub>x</sub> pollution from HDVs reflects the fact that they are often stationary or moving slowly in heavy traffic. Table 5.2 shows that around 80% of vehicles are cars and taxis. If effective measures were taken to reduce the number of private cars, less pollution might result from the HDVs. The Council should investigate this.
13. We believe that Table 7.2 presents an overly-optimistic view of likely pollution trends. In the first place, the projections themselves appear optimistic in the light of the fact the pollution has continued to increase despite the introduction of newer vehicle types; more importantly, the projections assume no increase in traffic flows, while BANES itself projects that traffic will increase substantially and the draft AQAP includes no measures to reduce traffic. This paragraph should include suitable caveats about the reliability of the projections.
14. Section 8. We welcome the actions proposed in section 8.
15. Action 2, page 25. We strongly support the proposal for a feasibility study into a Low Emission Zone for Bath, especially given the disproportionate effect of HDVs on air pollution levels. Since the study would not be completed before early 2011 and would take time to implement, we believe that there is a case for making a start with a Euro V standard. Whilst operators should have a reasonable time to acquire new vehicles or convert existing ones, the polluter pays principle should apply. We see little justification for a grant scheme to help vehicle owners. We strongly support restrictions on access to the city by coaches and an engine switch-off zone. Consideration should also be given to the use of the Park-and Rides for coaches and as school bus collection points.

16. Action 3. A low emission bus might be attractive to passengers, but what is more likely to get them out of their private cars is a combination of good service, comfort and affordable fares.

17. Action 8. Availability of the cars in the City Car Club is currently very good. Any expansion of the fleet should be accompanied by other measures to encourage use, eg wide publicity and a subsidy on the cost.

18. Action 12. The cleanliness Task & Finish Group strongly recommended that the Council should convert their cleaning fleet to low-emission electric vehicles. The first new purchases have not followed this advice. Most of the existing vehicles are elderly and polluting. Environmental Services should be encouraged to look at low-emission replacements.

19. Section 9. Now that the Westbury by-pass has been stopped, BANES should press ahead with restrictions on HGV on Cleveland Bridge, notwithstanding opposition from Wiltshire Council. Bath should not pay the price of the local opposition campaign which led to the rejection of the by-pass application. We also consider that BANES should initiate work now to secure an A46/A36 link and pursue the option of congestion charging in Bath. If it is already three years since 'Our Future Transport' was published, it is time for the West of England Partnership to get on and submit the TIF bid.

20. Section 10. We believe that Rossiter Road scheme would significantly reduce the high NO<sub>2</sub> levels in Widcombe High Street and have a great positive impact on Widcombe. We urge that the scheme should go ahead.

*Yours sincerely  
Patrick Rotheram*

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