

Federation of Bath Residents' Associations (FOBRA)

Response to consultation on Bath Air Quality Action Plan - Consultation Draft (Final)

General

1. The Federation of Bath Residents Associations represents some 5000 residents across the city. Air pollution and traffic congestion have consistently been our top concerns. Some 10,000 people live within the Bath AQMA. NO₂ pollution is above the legal limit throughout the road network in Bath, and it has not improved over the past 10 or more years. These levels of air pollution are known to cause serious health effects, including early deaths (perhaps 30 a year in Bath). Despite this, successive B&NES Councils have regrettably been reluctant to implement measures to reduce traffic and pollution.
2. The fact that the Government has listed B&NES among the most polluted authorities in the country, and that B&NES will now be *required* by the Government to develop and implement a plan to reduce pollution below the legal limit in the shortest possible time, provides an excellent opportunity for B&NES to take forward measures to reduce traffic and pollution.
3. 92% of NO₂ pollution in Bath is caused by traffic. Action must therefore be focused on reducing traffic volumes, particularly the most polluting diesel vehicles.
4. The new consultation paper is a step forward from the current AQAP, as it does now address traffic reduction measures. However, these measures do need to be incorporated into the final AQAP, and actually implemented.
5. Figure 1 usefully illustrates the widespread exceedances throughout the city. We hope that the final AQAP will contain an updated version of the dispersion map (copy attached) which features at page 69 of the 2011 AQAP and provides a powerful visual illustration of the scale and extent of air pollution in Bath. It remains broadly accurate, as pollution has not reduced.
6. Figure 1 shows an exceedance of 45 µg/m³ at Bear Flat. Consideration should be given to extending the AQMA up from Wells Road as an action under the AQAP.
7. Section 3.4 The source apportionment is very helpful in identifying the types of vehicles generating pollution in different places. Figure 3-1 and Figure C-2 highlight the enormous contribution that coaches and buses make to pollution in parts of the city centre. However B&NES's draft coach strategy proposes no measures to reduce the number of coaches entering the city centre, and indeed anticipates accommodating an *increase* of 24% by 2026. These proposals are quite incompatible with the requirement to reduce air pollution as soon as possible. The coach strategy is totally flawed and should be completely revised to meet the Councils' stated policy aim of reducing air pollution and the intrusion of traffic in Bath.
8. Section 3.5 Table 3-4 and Appendix D. The AQAP should be specific about what mechanisms are expected to bring about the reductions in NO₂ levels forecast in these tables, as it is not at all clear why pollution should be expected to reduce significantly with current traffic volumes. Diesel car usage and therefore pollution could continue to increase, given current trends and the apparent unwillingness of the Government to address this through

measures such as taxation. Diesel is still the fuel type of choice for the majority of car buyers, according to new research by Auto Trader.

9. These tables give a false impression of expected improvement ("Year Objective *will be met*") since as well as making certain assumptions, they assume no changes in traffic flow. B&NES Council currently have no plans in place which would reduce traffic flows, and in the absence of action by the Council to reduce traffic volumes it is probable that traffic into and through Bath will continue to increase. For example, DfT figures show that the number of cars using London Street, just east of the city centre, has risen from 12,000 to 15,000 a day in the past 5 years and there is no reason why this trend of 5% annual traffic growth should not continue. Eventually, congestion may be self-limiting, but that would involve stationary or very slow-moving traffic which would generate very high levels of pollution. The AQAP should make it clear that 'do nothing' is not an option.

10. It would therefore be more realistic and useful if the projections for the future contained a range of possible outcomes: with no changes in traffic flows; with increased traffic and worsening congestion; and with various traffic reduction measures in place.

11. In general, we support the measures in Tables A1 and A2. The measures in Table A1 are already contained within the Council's strategies and plans, but little or nothing has been done to implement them. We must again point out that unless B&NES Council actually implements these measures, nothing will change and the Council will fail to meet the objective set by the Government to 'develop *and implement* a plan designed to deliver compliance in the shortest time possible'.

12. To this end, the measures set out in Tables A1 and A2 should have specific timescales attached to them, and should be incorporated into a comprehensive transport plan. In order to 'deliver compliance in the shortest time possible', the earliest feasible timescales should be attached to each measure.

Comments on specific measures

Table A1

A. Support. FOBRA urged that the PMP should include different, stricter, parking standards applicable to areas close to the city centre, particularly in the EA, rather than a single standard outside the centre. We are also concerned about the proposal to 'flex' standards (an odd sort of standard, if they can be varied). Relaxing parking standards where on-street parking is limited would add to the supply of parking, contrary to the Bath Transport Strategy principle of using parking control limit traffic.

B. Support.

C. Support.

C2. P&R

The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. This is especially important now that hotels are opening and under construction in central Bath which offer no parking facilities for guests. It is not acceptable to expect nearby residential streets to accommodate these extra vehicles. There should be a shuttle service of

suitable vehicles for overnight visitors, serving the hotels and guest houses, perhaps paid for by the accommodation sector or a broader tourism grouping.

More attractive pricing arrangements for P&R should be considered eg. parking fees rather than bus fares. For 4 people in a car it is cheaper to drive in to Bath and park than to use the P&R. Pricing should incentivise overnight P&R use when it is introduced. P&R buses must be clean and attractive to use.

Use of P&Rs could be further diversified and expanded, as is done elsewhere in England. They could be used to help in reducing congestion caused by school children deliveries, and for delivery of purchases from city centre shops (as in Cambridge). They could be used for coach parking (already planned at Odd Down) and for coach drop-off and pick-up, with visitors taking P&R buses into the city.

As parking and traffic in the city centre is restricted and the Enterprise Area is developed, the arrangements for access from the east of Bath, including P&R, may need to be revisited.

C4. FOBRA has strongly supported the inclusion of the Metro-West rail project in the emerging West of England Joint Transport Strategy.

C8. The 'school run' contributes to congestion and pollution in some areas. We support measures to improve the provision of school buses, which should be subsidised to encourage their use.

D. Support. It should be self-evident that destination parking creates traffic. Every parking space attracts a car, usually several times a day. City centre parking generates traffic in the city centre and on the approaches to it. This is recognised in the Bath Transport Strategy.

D1. On-street parking in the Central Zone should be reserved mainly for residents and other essential users, such as the disabled. Those who feel they must drive in can use the car parks, where there is still plenty of capacity, but visitors and commuters should principally be expected to use the P&Rs, where there is also spare capacity.

D4. GABP7 of the Bath Transport Strategy actually calls for *reducing* central area public parking, retaining 500 public parking spaces within the Enterprise Area (a reduction of some 350 spaces). That should be stated here, or another reference cited. Louise Fradd recently confirmed to the Bath Transport Commission that GABP7 remains the Council's policy.

E. Support.

F. Strongly support. An alternative route for the current A46-A36 traffic is essential. Without one, it is impossible to see how traffic on the London Road can be significantly reduced. This is a serious problem in its own right but it also impacts on traffic throughout the city. FOBRA is calling for an alternative route to be found for the A36-A46 through traffic. This would not necessarily be the 'link road', which tends to be taken to imply one particular solution, ie a connection between the Batheaston bypass and the A36 in the area of Dry Arch. There is at least one other alternative, an upgraded route from Bathford to Beckington, with a new river crossing just east of Bradford-on-Avon. This route was proposed originally by the Highways Agency in 1997. A full feasibility study, with a sound evidence base, to analyse the problem and consider cost-effective solutions, is required.

G. Support.

H. Strongly support all these measures. However the list omits Action GABA 36 of the Bath Transport Strategy, which concerns restricting coaches from driving into the city. We propose a new measure:

"Revise the coach parking strategy to support the reduction of air pollution and reduce the intrusion of traffic in Bath, taking account of Action GABA 36 of the Bath Transport Strategy."

H1. We welcome the fact that funding for a Clean Air Zone should now be available. There should be a CAZ covering the whole of historic core of Bath (at least the area covered by the Public Realm and Movement Strategy (see map attached), and preferably extending up to Lansdown Crescent, one of the Key Elements of the World Heritage Site). The CAZ should include diesel cars (Type D), which are the major pollution source in parts of the centre. Effective traffic management should be used to prevent 'rat-running' through the surrounding residential areas. However, while a CAZ may help eliminate the most polluting vehicles, it would be far from a complete solution to the problems of congestion and pollution, especially if it does not cover diesel cars.

H2. We question whether North Parade is in fact an essential bus route. Bus traffic into this sensitive area should be minimised. Coaches would not need to use it if they were excluded from the city centre.

I. Support.

J. Strongly support. With just one lorry operating out of Avonmouth, the trial system was rather inflexible for business needs. Nevertheless, there was some take-up and the concept was proved. A system operating from a consolidation depot close to the centre of Bath, with a fleet of smaller vehicles (on the Gothenburg model) or micro-deliveries using electric bikes, would offer great flexibility and frequent deliveries and would be an altogether more attractive proposition for city businesses. Such arrangements would be even more attractive to businesses when delivery windows are imposed as part of the city centre traffic management system.

Table A2. These measures all appear sound and are supported.

F. Strongly supported. Through traffic brings no benefit, while adding considerably to congestion and pollution in the city. This applies both to traffic through the city as a whole (eg the A36-A46 traffic), and to through traffic in the city centre. We take it that the proposed study would address city centre through traffic since it would be linked to the CAZ study. A sound basis of data and analysis is essential.

From our observation, a high proportion of the traffic in the centre (eg George Street/Queen Square) is actually through traffic whose origin and destination lies outside the city centre. For many, this route is used as a short cut instead of the A36 Lower Bristol Road, which is the national network route through Bath.

H. For completeness, add 'Investigate congestion charging'. We recognise that a CAZ covering vehicle Types A to D could deliver similar outcomes.

H. Two additional proposals

- Make more use of the A46/420 as an alternative route between the east of Bath and Bristol. It is almost exactly the same distance (10 miles), but it avoids the heavily populated areas of Bath and Salford. By contrast, there is very little habitation along this route before the outskirts of Bristol. The A420 itself has quite light traffic. At present, there is nothing to advise drivers arriving at the end of the London Road from the east that there is an alternative. The A4 London Road (signposted 'Bath') continues through Bath to Bristol and, to most people, probably appears to be the logical direct route.
- B&NES should work with WECA to reduce pressure on M4 J18 by a new J18A in the Lyde Green area giving access directly to Emerson's Green and Mangotsfield and more widely to the eastern sector of the Bristol Northern Ring Road.

October 2017