

Federation of Bath Residents' Associations

Response to Bath Clean Air Plan consultation October 2019

1. FoBRA members' top priority is to reduce traffic congestion and air pollution in Bath, and we welcome the introduction of the Bath Clean Air Plan (CAP). The health of Bath residents and those working in the city must be B&NES's highest priority. Although the CAP is designed to address exceedances of Nitrogen Dioxide, we remain concerned about the health implications of exposure to particulates (PM_{2.5} and PM₁₀).
2. We support the principle of a Clean Air Zone (CAZ) and welcome the range of supporting measures.
3. We welcome the recognition that traffic congestion needs to be tackled as well as air pollution, and the intention to provide better facilities for walking, cycling and public transport (pages 1 and 16).
4. We welcome the extension of the CAZ boundary in the Bathwick area (page 6). Due to this extension, a small further extension up to Sydney Buildings is requested.
5. There could be adverse impacts on residential areas surrounding the CAZ due to motorists seeking to escape charges by finding routes which avoid the CAZ. We note that there is also predicted to be traffic displacement within the CAZ (page 13). B&NES should monitor traffic in all these areas and intervene promptly, in consultation with the relevant residents' associations, to mitigate any increase in traffic volumes. Early consideration should be given to mitigation measures in areas where traffic diversion is predicted.
6. We are concerned that non-compliant vehicles may be parked just outside the CAZ especially in areas without the protection of a residents' parking zone, and wonder whether penalties will be high enough to deter some operators, who could decide simply to treat them as a business expense. The Council will need to be alert to these risks and be ready to take action as necessary.
7. CAZ signage and cameras will have an adverse impact on the public realm. CAZ signage should be the minimum necessary. At locations where there are existing signs, it may be necessary to re-design the overall signage in order to minimise the visual impact and to avoid confusion to drivers.
8. We recommended in our comments on the 2018 consultation that B&NES should adopt the precautionary principle and aim for NO₂ levels well below the limit to allow a good margin of success and maximise the health benefits for residents and others. We are concerned that the scheme as designed has a narrow margin of success or failure, a concern which has been reinforced by the Peer Review. There must be robust monitoring and evaluation of performance of the scheme including monitoring of air quality and of any displacement of traffic, within or outside the CAZ. Monitored locations should include roads with uphill gradients (as highlighted in the Peer Review). We attach importance to the Peer Review's recommendation for robust contingency plans which can be put in place if the scheme performs significantly differently from the business case, including how the monitoring and evaluation plan would identify if and when additional intervention was required, what this intervention might be and how it would be implemented and funded.

9. We note that the traffic modelling does not include possible new developments incorporating car parking. In particular, the proposed large car park on the Recreation Ground would, if approved, add substantially to parking capacity, contrary to the Bath Transport Strategy, and hence to congestion and air pollution in this part of the CAZ. The impact of a large car park in this area would be likely to invalidate the assumptions on which the CAZ was designed.

10. The traffic signal heads and control columns proposed at Queen Square will add greatly to street clutter, and the number should be minimised. We are not convinced of the effectiveness of the proposed traffic light scheme: the lights are likely to result in traffic backing up, leading to increased congestion and pollution in this and other areas nearby. In this event the Council should be prepared to reconsider the option of closing some sides of Queen Square, which would also yield benefits for the public realm in this iconic space.

11. We welcome and support action against idling, and enforcement of HGV weight limits (page 15). We urge B&NES to continue to press for funding from JAQU for these important complementary measures. At present, weight limits are not enforced in the city despite requests over many years to Avon and Somerset Police. The opportunity should be taken to introduce enforcement cameras at key locations to enable this. We welcome proposals for last mile delivery and servicing support for businesses within the CAZ.

12. We note that the Council is now offering support to businesses on developing and implementing travel plans, and in view of the major problems caused by the school run in much of Bath we suggest that this offer be extended to schools, and that this might be a priority for the use of CAZ receipts.

13. It may be appropriate to provide a small number of rapid charging points within the CAZ for vans, taxis and PHVs, but we suggest most of the proposed rapid charging points for these vehicles should be provided at park-and-ride sites to avoid unnecessarily drawing additional vehicles into the CAZ for charging. Charging points for commercial vehicles inside the CAZ should be available only to small commercial vehicles (vans, taxis, PHVs) and not to larger commercial vehicles.

14. The CAZ must be seen in the context of the overall transport strategy for Bath including parking strategy, Low Traffic Neighbourhoods (LTN) and public transport strategy. The Council should consider further measures to reduce vehicle numbers coming into Bath including greater incentives to use park-and-ride and reducing non-resident visitor parking within the CAZ. A workplace parking levy should be considered. The use of the A420 as an alternative route between Bristol and the east of Bath should be actively pursued. An alternative route for HGVs which currently use the A36-A46 route through Bath is essential. The goal should be to achieve reductions in the overall amount of traffic entering Bath at least sufficient to outweigh any increases in traffic or pollution in areas affected by displacement or rat-running as a result of CAZ measures.

15. We strongly support extended opening hours at the park-and-ride sites, with secure overnight parking (page 16). There is a pressing need to provide an alternative to car access from the east of Bath. The use of 'link-and-ride' should be explored, but we believe there is a need for a park-and-ride site to the east of Bath, possibly across the border with Wiltshire. A

park-and-ride or park-and-share site using the abandoned South Gloucestershire car park at M4 Junction 18 should be investigated.

16. A comprehensive city traffic management plan is required to reduce traffic in the historic core of the city, while deterring rat-running in other residential areas. A traffic plan is also required to provide a framework for the introduction of LTNs (page 16). The introduction of LTNs should be coordinated with CAP measures to maximise synergies and avoid duplication.