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| **The Widcombe Association** |

**REVISED RESPONSE TO THE CONSULTATION ON A CHARGING CLEAN AIR ZONE FOR BATH**

The Widcombe Association has considered carefully the latest proposals for a clean air zone in Bath. This has included a one-to- one meeting at one of the public consultation sessions and a subsequent meeting with the clean air team. We have also received comments on the proposal from a number of Widcombe residents and from some of the traders in Widcombe. There is a wide range of opinion within Widcombe on the proposal to introduce the clean air zone, so the support expressed below is qualified by the need for greater clarity on the justification, and especially on the inclusion of Class D, and also for more information on the support measures for those with non-compliant vehicles.

The Widcombe Association recognises the importance of reducing air pollution in the city, and acknowledges that the Council is under a legal obligation to achieve a reduction to a given threshold within a relatively short period of time. Vehicles are clearly the source of much of the pollution. The A36, the principal east-west route across the city, passes through Widcombe, and along Pulteney Road in particular where it is immediately adjacent to housing, a junior school and a student hall of residence. The need for urgent action to reduce air pollution is accepted, and the Council’s proposal for a clean air zone, probably the only real short term option on the table, is supported in principle. We do think, however, that the Council has been forced into this last minute action due to its past failure to properly address the issue of air pollution from when it was first required to by law in 1995.

We have a number of concerns about the proposals as currently outlined. The basis of the Council’s justification of the clean air zone is a complex modelling exercise into which have been put assumptions on traffic growth and the response of drivers of non-compliant vehicles to changes in costs to drive within the city. It does seem that the modelling work was rigorous and subject to extensive scrutiny including sensitivity testing. The problem is that traffic modelling, for all its sophistication, remains a best guess, and yet radical proposals are being proposed based on the outputs, which, for the three options that have been presented, show relatively little difference between them. According to Appendix A, table 3 of the Jacob’s report, there are only two points out of 110 on the network at which the threshold of 40ug/m3 is shown to be equalled or breached, and then only by 1ug/m3. That is true for all three options. Is a modelled 1ug/m3 at two points on the network sufficient to justify the choice of option D rather than C?

We understand that with option D there would be additional incentives to support drivers with non-compliant vehicles, but option C meets the objectives to all intents and purposes. However, we can see that there is less risk

in missing the target with option D as it will attract funding that can be reinvested in counter measures including improvements to the public transport system.

Despite the assurances that we have had, one issue that does concern us is the absence of any evidence in the modelling outputs of a diversionary effect, whereby non-compliant vehicles avoid the zone, using roads that are less suitable for traffic. Such rat-runs already exist and are a cause of complaint and the Council is addressing the problem in some areas. The fear is that unless appropriate measures are taken, the consequence of the clean air zone will be to exacerbate these problems. Even if there is a transfer of compliant vehicles to routes through the zone to offset the diversion of non-compliant vehicles to routes outside the zone, there will be an additional impact on the peripheral residential areas due to the higher levels of harmful emissions. There needs to be a commitment to monitoring traffic on the diversion routes around the clean air zone from the outset of the scheme.

One way of helping to mitigate the potential for diversion to peripheral routes might be to extend the zone further than has been proposed, for example, by including the Bathwick Estate together with the roundabout at the foot of Bathwick Hill and the junctions at the bottom of the Warminster Road. Another likely consequence of having the zone drawn close to the city centre is for the drivers of non-compliant vehicles (cars in particular) to park in unregulated areas just outside the zone. The Council is already considering the extension of a residents parking zone outside Zone 3 (Widcombe) to include Greenway Lane, Lyncombe Vale, Lyncombe Vale Road, Rosemount Lane and Perrymead, to deal with the existing problem of non-residents parking. It is imperative that that this extension to residents’ parking is progressed in parallel with the introduction of the clean air zone. Other streets in Widcombe might also come under pressure including The Tyning and Horseshoe Walk.

One issue that is causing concern is the level of the proposed charges for non-compliant vehicles, especially on those who are less well off. It has been indicated that some support is being considered in order to enable owners of non-compliant vehicles to comply. We understand that this would be a swappage scheme using means -tested grants or non-means tested interest-free loans . It is unclear how this would be applied : would it be available just to residents of Bath and North East Somerset, or to any driver who can demonstrate a need to drive into Bath? It is imperative that the Council provides greater detail on the application of this support scheme as soon as possible. How will it operate? Who will qualify? What level of support will be available through grants or loans? When will it be implemented?

There is also concern amongst the traders in Widcombe that the clean air zone will harm their businesses, both due to the effect of higher costs to suppliers and the unwillingness of customers with non-compliant vehicles to come to Widcombe. There is no evidence that the Council has analysed the impact of the scheme on local businesses. To ensure that the introduction of the clean air zone does not unfairly disadvantage local businesses reinforces the need for the support scheme to be confirmed and we believe that it should be publicised as soon as possible so as to reassure those who are greatly concerned.

There is reference in the public consultation leaflet to initiatives to encourage walking, scooting and cycling to school. The school run is one of the most significant contributors to congestion and air pollution. The Council is

urged to increase its engagement with schools, to ensure that every school (both independent and state) has a travel plan that seeks to make use of buses as well as walking and cycling, in order to reduce the number of vehicles used on the school run.

One feature of the scheme will be the infrastructure that is required, the cameras and signs on the roads entering the zone, on the streets within the city centre, and on other roads informing drivers of the zone. Given the status of the city as a conservation area and world heritage site, there has to be concern about the impact of this additional infrastructure. It is the view of the Widcombe Association that the use and impact of traffic signs and signals in Bath is already excessive and the additional signs and cameras will further damage the city visually. It is important that the introduction of the necessary infrastructure is carried out as part of a city-wide strategy to rationalise and reduce the total amount of signage and limit its impact.

We recognise the potential benefit that any funds generated by the scheme will be reinvested in local transport infrastructure. This needs to be a binding commitment and should include improvements to park & rides, improved local transport, cycling and walking as well as measures to address the issues of the school run. Also these funds should be utilised for local initiatives to counter problems of diversionary traffic effect (rat runs), commuter parking and managing the impact of increased road signage.

**Summary**

* The Widcombe Association accepts the importance of reducing air pollution for the benefit of residents, workers and visitors and the Council’s legal requirement to rapidly reduce pollution to legal levels. The WA therefore supports the principle of the clean air zone.
* The Widcombe Association supports the introduction of the Class D option on the basis that it is more likely to enable the target to reduce air pollution across the city to 40ug/m3 or below to be achieved, but this support is qualified by the need for greater justification for the proposed charges, and further information on the support measures for the drivers of non-compliant vehicles.
* The details of the support schemes to help people swap from non-compliant to compliant vehicles should be made available as soon as possible, and prior to the final approval of the scheme by the Council. The final approval of the clean air zone should include the details of the fully worked out support schemes and the Council’s commitment to them.
* The Widcombe Association supports the inclusion of the additional areas to the zone now proposed in the Widcombe area, in particular the Pulteney Road. to reduce pollution outside the school and local residential areas if traffic were to be displaced from a City-Centre only clean air zone. We believe the boundary of the zone should be extended further to include the Bathwick Estate, incorporating the roundabout at the foot of Bathwick Hill and the junctions at the bottom of the Warminster Road.
* Residents have concerns about the potential risk of rat runs, added congestion and increased commuter parking around the edge of the zone. Effective counter measures should be progressed alongside the clean air zone to mitigate the effects of these including taking forward the proposal for a residents parking zone in Lyncombe Vale, Lyncombe Vale Road, Rosemount Lane, Perrymead and Greenway Lane, and possibly in The Tyning and Horseshoe Walk which are not included in the current proposal.
* Local businesses have concerns about loss of business with option D. Support measures must be implemented to mitigate the consequences of introducing the zone including support for businesses . The Council should engage further with local businesses in order to consider the potential impacts of the clean air zone on their businesses. There is a need to place greater emphasis on the school-run in order to reduce the reliance on the use of private cars to transport children.
* There is a concern that the clean air zone infrastructure will add to the existing excess of traffic signs and signals in the world heritage site. We would urge a wholesale review to rationalise the number of signs and traffic signals in parallel with the introduction of the clean air zone and its infrastructure.

The Widcombe Association

5th December 2018

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