

**Clean Air Zone**

**BPT consultation response**

Bath Preservation Trust and its staff, trustee and committees are all in different ways affected by the Clean Air Zone (CAZ) proposal and we recognise therefore that we might, as with any organisation, have a number of personal conflicts in relation to the scheme. We have (as with any proposal) therefore clearly focussed on the remit of the Trust alone in considering our response.

The three ‘ills’ of traffic in Bath as it affects the fabric and amenity of the historic city are pollution, congestion and vibration. The Trust welcomes the principle of a Clean Air Zone charging structure and the associated beneficial impact it will have on the first of these within the zone: air pollution. We are also hopeful that it could also result in reduced congestion and vibration within the historic city. We recognise that there needs to be large scale behavioural change in society’s relationship with the car and the CAZ has a part to play in this and has the potential to result in a more pedestrian and cycle friendly city where public transport is more widely used (though achieving this does depend on the extent of the vision and the suite of initiatives the CAZ will introduce). Given our remit which encompasses the conservation of our heritage city, as well the sensitive management of physical change within that environment, there are only certain aspects of the CAZ that we will comment upon, bearing in mind that there are social and communal impacts of this scheme that are out-with our area of focus.

**CAZ must be supported by a comprehensive transport package**

We are concerned that the CAZ, while including some ‘carrots’ or concessions, is primarily a punitive measure without a complementary set of initiatives that give sustainable and effective alternatives to travelling by car. Meaningful investment in cycling infrastructure (not just more bike parking but making cycling safer and more attractive on roads via cycle lanes or walk/cycle shared pavements) and a fit for purpose affordable public transport system are a crucial part of what should be a package of measures. We are concerned that amongst the mitigating provisions, the public transport element is reliant on the private sector provision of public transport alone. The consultation states that *‘An air quality awareness campaign to encourage a shift in travel behaviour’* will be implemented. No amount of publicity can be effective if the tools available to help shift travel behaviour (cycle infrastructure on roads, and public transport) are perceived to be unsafe or unaffordable.

The CAZ is not a congestion charging zone, therefore congestion may still be a major negative issue for the city that will not have been tackled. Behavioural change underpinned by the availability of alternative means of transportation is the only way congestion can be reduced in the long term. Surely the ambition to tackle both pollution and congestion should be part of the CAZ vision, because both are so interrelated? Hence our call to provide a wider package of measures to support a CAZ.

**Are the Clean Air Zone boundaries right?**

We question why the Great Pulteney Street and Bathwick area is not included in the zone? The edge of the zone adjoins a listed public park and series of important Grade 1 listed buildings. To the extent that part of the need for cleaner air is to protect the heritage as well as people, this seems anomalous.

Given the difficulties in extending the zone once the CAZ is implemented, we would call for consideration for the CAZ to extend to the WHS boundary from implementation. This is because we are very concerned that the zone as identified will result in displacement of non-compliant traffic resulting in a series of rat runs, and potentially, new problematic air quality areas. If traffic is forced out to the residential suburbs of Bath and its environs (for example the toll bridge at Bathampton or the streets of Weston) this will increase pollution in those areas, so there may merely be a shift in legally non-compliant streets from the city centre to the suburbs, with the associated impacts on health and wellbeing and residential amenity. At the very least we recommend that there be effective ANPR monitoring across the whole city, in advance of the installation of the zone, to identify known and possible ‘rat runs’ and then to understand the impact the CAZ has on the wider Bath townscape. This would then mean the Council was ready with data to make changes should impacts become intolerable.

**School transport**

The CAZ would appear to impact heavily on the ability of children to get to school, particularly given the closure of two schools in the west with new provision provided in the east of the city, and we once again urge B&NES to research and propose solutions to the perennial problem of car journeys made on the school run, including the subsidy and support of appropriate school transport and working much more constructively and productively with both state and private sector.

**Concessions**

Whilst not part of our core remit, we welcome the concessions being considered but wonder if they go nearly far enough to assist people on low incomes or with special transport-related needs. While it is right to consider healthcare professionals as a priority, much of Bath’s economy relies on lower-wage workers commuting into the city.

**Extension of Park & Ride hours and service**

In the last Transport Conference we were very clear that although Park and Rides encourage car journeys in the periphery and are not an ideal long term solution, improving the existing P & R offering to maximise its usefulness in reducing congestion is a ‘quick win’ for B&NES.

Maximising the effectiveness of Bath’s Park & Ride operation is key to the success of the CAZ. This includes bringing the Park & Ride offering up to the level of other heritage cities such as Edinburgh and Oxford, where 24 hours P & R sites are operational, meaning that staying tourists, visitors, commuters, shift and night workers can all use the P & R sites and do not need to travel near the city centre.

**Conclusion**

BPT wishes to support the CAZ as this initiative at least represents action in the right direction. As we have indicated our support is offered only on the proviso that the CAZ becomes one of a number of initiatives to tackle increasingly crippling congestion via behavioural change by offering viable alternative forms of transportation in our heritage city.