**Public Consultation 07/02/2022**

**Bath Preservation Trust Response to ‘Journey to Net Zero’ Plan**

The need for a coordinated and systemic approach to reduce the environmental impact of transport in Bath is an essential requirement, which will benefit everybody. Journey to Net Zero is a good statement of intent and starting point from which to initiate the change necessary to significantly reduce carbon emissions. There are however some areas where the plan could and should be strengthened as well as some deficiencies or ambiguities, such as traffic cells, liveable neighbourhoods and the coach strategy. Each proposed project should be subject to transparent public consultation in its planning, prior to delivery.

A more **holistic view or vision** should be provided to put the plan in context and show how it integrates with other policies. The Council must commit to:

* All related planning policies and SPDs must be robust and detailed enough to support the ambition of this plan, so that the projects and measures are implements to the highest standards.
* Consider how will the measures impact the public realm and historic character, such as bigger bus stops, new infrastructure, road enhancements, pedestrian / cycle priority, liveable neighbourhoods. Without better understanding of the impacts and mitigation, it is not possible to fully endorse the plan.
* Ensure the WECA mass-transit scheme does not make Bath a dormitory to Bristol for students, by properly managing the proliferation of PBSAs and covenanting them for use by those studying in Bath postcodes only.
* Long-term policies for maintenance and renewal of all infrastructure giving equal priority and weighting for all transport types. Currently, cycle paths and footpaths are compromised in favour of roads for repair which is a disincentive to users.
* Get users involved with the design and placement of walking and cycling infrastructure to ensure it meets expectations.

Alongside the provision of new infrastructure, equipment and vehicles, **behaviour change** will be one of the most significant components to achieve the goal of net zero carbon emissions. Effective behaviour change will require clear understanding of options, availability and accessibility to have long-term benefits – people and transport users must be involved with defining the detail of each of the proposals. BPT believes behaviour change must be considered at all levels to be more clearly defined and implemented:

* Provide public information and clear messaging about schemes and travel choices, working with groups which are the highest polluters.
* Provide heavily subsidised or free green travel options for those who can least afford them, e.g. Bristol Bike Project ‘earn-a-bike’ and ‘wheels to work’.
* Provide incentives or recognition for employers / schools which encourage green travel options by users and staff.
* Extend the Clean Air Zone charging to all non-resident domestic through journeys, using income raised to implement other measures in the plan. This would apply a ‘toll’ for people using Bath for through journeys.
* Marketing of Bath as a walkable, bikeable city.
* Work with bus companies to ensure buses are more trusted by commuters, e.g. there is currently no obligation for a bus company to refund tickets for a no-show or if the bus is already full, meaning the service is unreliable.
* A solution to provide mass availability of on-street EV charging is essential, using existing street furniture rather than catering for individual dwellings in the historic centre. Retrofit solutions for lampposts already exist elsewhere.

Full **carbon accounting** is required for each of the plans to provide confidence that the plan will bring the required long-term reduction.

The plan does not count the significant extra cost of **embodied carbon** and is therefore not telling the full story. Glass, steel and concrete all produce high volumes of carbon emissions which will have an impact long after 2030 so it is disingenuous to say this will achieve net zero by 2030. The full story would spell out how this will be mitigated, or ‘amortised / depreciated’ over a fixed period.