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| CAZ Public Consultation,  Environmental Services,  Lewis House,  Manvers Street,  BATH,  BA1 1JG |  |
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|  | 23rd November 2018 |
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| **Response to the Bath Breathes consultation on behalf of Bathampton Parish Council.** | |
| Thank you for this opportunity to respond to the consultation. Bathampton Parish Council recognises the need to improve the air quality in and around Bath and we understand the requirement from central government to reduce NO2 levels by 2021 at the latest. We noted your calculations that by introducing the Clean Air Zone, Bath will meet its air quality targets four years earlier than otherwise. We appreciate the time that officers have taken to meet with us and in particular we appreciate you holding the event in Bathampton Village Hall to address residents’ concerns about potential rat running. | |
| We understand that your modelling suggests that 79% of the car fleet and 75% of the total fleet will be compliant by 2021 (although the scheme starts in 2020). As we understand it your assumption is that very few cars will actually pay the £9 charge. Indeed the charge is set to be a disincentive. Your assumption is then that the roughly 20% of drivers of cars that would have been non-compliant by 2021 will take another action to avoid the charge. This would either be changing their car to a compliant car earlier than they would otherwise have done, modal shift e.g., to walking, cycling or travelling by public transport or not making the journey. We note that you have also stated that another response would be to change route, but we are concerned that your modelling has not taken account of the fact that one of those route changes would be to avoid the charge by rerouting through Bathampton to avoid the zone. | |
| We are also concerned that your modelling, particularly around Bathampton, is based on out-of-date figures and predictions, and note that you have only recently installed measures to provide current traffic counts. We ask that you please provide us with the data and parameters used in your model and how you reached the conclusion in the OBC. Also, please will you pass on to us the recent traffic count data asap? You will have realised that many residents find it difficult to believe the conclusions and are understandably interested in the data and why you have not as yet been able to provide it. We expect your analyses to be reviewed in the light of updated information. | |
| BANES officers also offered to install a Pollution Monitoring device on Bathampton High Street starting on 5th December 2018 which will provide actual pollution figures rather than averages. This is much appreciated, thank you. | |

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| We note that your modelling assumes that 6,500 cars will be using the toll bridge by 2021 - please can you explain how you derive this figure? Bathampton is already an established rat run for drivers wishing to avoid congestion on the London Road, and we know from experience that any problem on that road causes a large increase in traffic over the toll bridge and through Bathampton. Increased volumes do not seem to deter drivers who just adjust journey times, which therefore extend the peak periods. The village is not designed even for the level of traffic that currently uses it. The canal hump-backed bridge requires vehicles to pass where vision is restricted and is also the only pedestrian route to the school, church and pubs. Traffic travelling on to the A36 has to leave the village via one of three junctions all of which have poor visibility and which access a road where vehicles are generally travelling at around 40 mph in a 30 mph limit (shown by a Highways England survey). The village often gridlocks with current traffic levels or as a result of large Network Rail vehicles accessing the railway, delivery lorries or coaches visiting the King Edwards playing fields and getting stuck in narrow spots; traffic backs up through the village and also along Mill Lane, the toll bridge and London Road. |
| So Bathampton Parish Council and businesses and residents of the village are greatly concerned by the risk that even more cars and light good vans will evade the CAZ charge by using the toll bridge to avoid crossing the river at Cleveland Bridge. This would be the case for vehicles travelling on south via the A36 or using North Road or Brass Knocker Hill to travel west via Combe Down. We can also envisage people driving into the village and parking in order to travel to Bath by bus or on foot or by bicycle on the canal path, further exacerbating the existing, significant parking problems in the village. |
| Based on 2017 Department of Transport data 21093 vehicles use the London Road each day. Of these 15966 are cars (including taxis) and 3507 are light goods vehicles, the two categories that could use the toll bridge. 20% of these vehicles are almost 4000 vehicles per day. |
| The latest data that we have available for the traffic on the toll bridge is based on an automatic count for a week in May 2014. As would be expected traffic flows are greater on weekdays that weekends (e.g. 5521 on a Friday versus 3617 on a Sunday). In addition there are two clear peaks in a day with 495 vehicles (on an average weekday) between 8 and 9 am and 453 vehicles between 5 and 6pm. At heaviest flow times in the data set 535 vehicles crossed the bridge in one hour. Between the peak times average traffic is half that level and in the evenings it would generally be less than 100 per hour. |
| All of this demonstrates that there is substantial capacity on the toll bridge for drivers of non-compliant vehicles to reroute through Bathampton. As this would not be driven by peak time queues on the London Road, but by a 24/7 charge, it is likely that traffic flows will increase throughout the day in both directions. |
| It would not take a very large proportion of the 4000 non-compliant (and therefore more polluting) journeys on the London Road to reroute through Bathampton to put extreme pressure on our village road system. |
| It seems that the likelihood of the problem being solved is heavily reliant on BANES success in converting the potential 20% of non-compliant journeys into compliant ones which can then continue to travel via Cleveland Bridge. So far there is little evidence of appropriate action to achieve this such as an education and support programme to help drivers of older vehicles to switch to compliant vehicles. It would also rely on drivers having options to switch to reliable public transport. Whilst you have hinted that grant programmes might be available for the oldest vehicles there will be many drivers with 5 year old diesels who bought in good faith, encouraged by government policy, who will be very resistant to changing their vehicles, particularly if sale values fall due to high supply and low demand. There was certainly not enough information available in the consultation on the support available to encourage the switch from non-compliant to compliant vehicles or on improvements in public transport to give Bathampton confidence that the 20% can be reduced to zero by the time the scheme is introduced. |
| At the Bathampton meeting there was discussion over what could be done to avoid this potential increased use of the rat run through the village. Officers and residents mentioned that possibilities included extending the CAZ to include the whole of Bathampton or extending the CAZ to the bottom of Warminster Road and North Road or adding a ‘CAZ bubble’ on Mill Lane. Another suggestion has been to make the CAZ boundary the WHS boundary. Whilst we can see that including the whole village in the chargeable zone would avoid the rat running issue it would have implications for residents and also for people who work in the village or visit the pub or school etc. Bathampton is particularly poorly provided with public transport with only an hourly service and only during the daytime. This would mean people working in the village eg at the school or the pub could not rely on public transport to get to work. |
| There is widespread support for an extension of the CAZ which would prevent Bathampton from being used as a rat run to avoid the charge, therefore we ask please that BANES include this extension in phase 1 of the CAZ proposals. To determine the precise nature of the extension we would be happy to work with BANES to canvas the views of residents and the school and local businesses. |
| We would also like to make it clear that since the volume of North - South through traffic using Cleveland Bridge is very small, it is our belief that the possible LINK road across the valley would offer little in the way of solution to Bathampton or Bath's congestion problems. |
| In conclusion, whilst we support the aims of the scheme and understand the need to improve the air quality in Bath, Bathampton Parish Council are very concerned that insufficient thought has been given to the risk that not all drivers will switch their vehicles to become compliant and those drivers will find alternative routes to avoid the charge rather than undertaking a modal switch. This will mean yet higher levels of pollution, congestion and disruption for the residents and schools in Bathampton. |
| We also would like to see that as a result of the general consultation, consideration is given to other concurrent measures to reduce pollution levels including   * Improved public transport * Charging only during peak hours * Subsidised school bus services |
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| **Bathampton Parish Council** |