

For the attention of Aled Williams, Environmental Protection Manager, Bath and North East Somerset Council

Bath Clean Air Zone consultation

Comments from Bradford on Avon Area Board, 28 November 2018

Dear Mr Williams,

Thank you for allowing this late submission to the Bath Clean Air Zone consultation as agreed with Peter Dunford, our Community Engagement Manager.

A meeting of the Bradford on Avon Area Board of Wiltshire Council was held on Wednesday 28 November at St Margaret's Hall in Bradford on Avon. It was attended by elected representatives of unitary, town and parish councils, stakeholder organisations and residents of the town of Bradford on Avon and the neighbouring villages of Holt, Limpley Stoke, Monkton Farleigh, South Wraxall, Staverton, Westwood, Wingfield, Winsley.

Introductory comments

As an area with similar air quality issues, we fully understand and support the objectives of the Bath Air Quality Plan. We would be very happy to offer our help, support and expertise in any way that could benefit the wider Bath area.

The Bradford Avon Area Board and its partners endorse the detailed and technical comments made by Wiltshire Council Highways on behalf of our communities, particularly the points made about the need for an holistic approach.

Officers and members of Wiltshire Council have tried to engage with B&NES Council on this issue with limited effect, to date. Our major concern is a lack of robust data and modelling available to accurately assess impacts outside the city of Bath and on this part of Wiltshire.

Our communities are concerned at the displacement effect of the Bath CAZ, effectively moving air quality problems onto adjoining areas, contrary to government guidance.

Bradford on Avon itself has an ongoing problem with air quality and has had an Air Quality Management Area in its town centre designated since 2001. Other areas of the town receiving an increase in non-compliant traffic risk becoming similarly affected.

Concern was expressed at the possible future closure of Cleveland Bridge to HGVs without alternative suitable routes being available and the possible impact on the hamlet of Woolley Green and the village of Staverton. Woolley Green is an accident blackspot and any increase in large through-vehicles will only make this more dangerous to residents and pedestrians.

Along with other communities in west Wiltshire we would support modifications to the geographic designation of the Bath CAZ, such as excluding the London Road and Lower Bristol Roads completely in order to provide a “ring road” to the CAZ. The current limits of the CAZ offer no alternative routes to vehicles travelling north-south or east-west.

We feel there is a real need to invest in environmentally-friendly public transport in a cross-border co-ordinated form. For instance, residents from villages bordering B&NES such as Monkton Farleigh and South Wraxall currently use the village of Bathford as an informal “park and ride” because there is no co-ordinated cross border bus service. This situation will only exacerbate.

Comments from parish councils and unitary councillors

Formal consultation responses have been made by a number of parishes. Additional comments included the following:

Bradford on Avon: The Mayor expressed concern that “Bath’s problem will just become Bradford’s problem” and requested that B&NES Council works more closely with Wiltshire Council to mitigate any adverse effects of the Bath CAZ and to keep the town “open to business”. She was not supportive of “tit for tat” punitive measures that effectively penalise the poorer members of the community and urged a joined-up approach and co-ordinated improvements in public transport.

Monkton Farleigh: Concerns were expressed regarding increased HGV traffic through the village. Also about the already-regular road works to strengthen the embankment on the A363 through Sally in the Wood. There is a need for a park and ride scheme on the east side of Bath.

South Wraxall: Concerns were expressed regarding heavy traffic avoiding the congested A363 and taking back roads through Kingsdown and South Wraxall to avoid the Bath CAZ. They would like a weight limit put on this route.

Limpley Stoke: Concern was expressed at the possible impact on the village given the issues with subsidence on the A36, particularly in the event of a future A46-A36 link road. Sat-navs currently show a short-cut via Woods Hill which is a narrow and steep, single track road and totally inappropriate for such use.

Westwood: There will be increased traffic and pollution generated by vehicles rat-running through the narrow village streets where there is a 20mph traffic calming scheme.

Holt: Although a limited impact is expected, concerns were raised regarding increased HGV traffic through the village and impact on an already busy main road.

All councillors expressed a strong wish for improved collaboration between the councils on both sides of the county boundary.

Comments from stakeholder organisations

BoA Business: Expressed support for the removal of the A4 Cleveland Bridge junction from the proposed plan to prevent Bradford on Avon suffering the consequences. Also suggested that Bradford on Avon should be proactive and consider its own CAZ and congestion charge, enforced through siting ANPR cameras on the Town Bridge. Data should be collected to measure future through-traffic in the town centre of Bradford on Avon, to compare against historic data which is already available.

Bradford on Avon Streets Ahead: As in London where there are ring roads around the low emission zone, the area of the Bath CAZ should be reduced to areas of the city within the A4 and A36 boundaries to leave a, non-charging, inner ring road. The A46- A36 link road through the Bathampton Meadows should not be forgotten.

General discussion

Signage is requested from the M4 motorway to the north and on the A36 to the south telling HGVs the most suitable routes to take to avoid the Bath CAZ, while also deterring vehicles from rat-running through our small secondary roads.

A dispensation is urgently requested for users of the Royal United Hospital, such as a refund scheme or an ANPR system in the hospital car park, so as not to penalise the sick and vulnerable in our society.

One of the knock-on impacts would be the increased use of local railway stations at Bradford on Avon, Avoncliff and Freshford. There is already insufficient parking in the Station car park in town and similar parking issues will arise in the villages with railway halts.

Doubts were expressed about the stated levels of through-traffic on Bathwick Street and a request was made for access to the raw data to allow independent analysis.

A request was made that the process should include lobbying the automotive industry for retro-fitting of existing vehicles to improve emissions.

Air quality data from diffusion tubes in the town centre and from the real-time monitor on Masons Lane should be collected systematically to measure impacts. A special meeting should be called to agree a monitoring regime.

In conclusion

Whilst we have no wish to deter B&NES Council from improving the air quality in Bath, we feel that the current approach is myopic. Any plan for air quality control in Bath needs to consider the wider area. Traffic from Bristol, from the toll-free Severn Crossings and from the west Wiltshire area cannot be excluded from this study without the effect of displacing the issue onto neighbouring communities.

The implementation of a charging zone in order to deter non-compliant vehicles is effectively a tax on the poor unless there is an effective alternative in the form of park and ride on all sides of the city as well as an effective public transport service. We would request that B&NES Council involves representatives from our community in formulating a strategic plan to enable those living across the border in Wiltshire to effectively access services and employment in Bath.

In order to strengthen the robustness of the data, we would request that B&NES Council allows Wiltshire Council to combine ANPR datasets from both our areas so that we can, together, forecast accurately the likely impact on our combined local area and on the wider strategic network. We would welcome the opportunity to share this information with all the stakeholders across the wider Bath area to facilitate the holistic approach we feel is so important.

The Bradford on Avon community is in favour of having a joint platform to establish a sub-regional strategy involving Highways England for improving traffic-related air quality, rather than piecemeal solutions. However there have also been suggestions that, should the CAZ go ahead without significant engagement with our community, we would be left with no other alternative but to consider similar charging deterrents or weight limit restrictions across our area. This would be a sad spiral of punitive measures and is not our preferred outcome.

The overwhelming view of the meeting was a sense of frustration at the divisive effect of these measures, rather than this being an opportunity for an inclusive strategy for transport and air quality across this part of the West of England.

Yours sincerely,

Councillor Sarah Gibson,

Wiltshire Councillor and Chairman, Bradford on Avon Community Area Transport Group

On behalf of the parishes of Bradford on Avon, Holt, Limpley Stoke, Monkton Farleigh, South Wraxall, Staverton, Westwood, Wingfield and Winsley