

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 the increase in traffic (both HGVs and cars) on the A363 and through the village resulting in a substantial rise in pollution and traffic congestion. There are already regular road works to strengthen the embankment on the A363 through Sally in the Woods and that is likely to be exacerbated. There is an urgent need for a park and ride scheme on the east side of Bath.

South Wraxall: The concept of reducing air pollution in Bath was agreed. However the unintended consequences in the neighbouring areas should be mitigated as part of the project and should include a traffic study to determine which routes the diverted traffic would use. There was concern that the polluting vehicles diverted from the north-south route through Bath (A46 – A4 – A36) would find alternative routes through the parish. In particular HGV’s diverting through the village along the road from Kingsdown to Wild Cross would be an issue. Mitigations should include:

- Sign posting on the M4 diverting HGV from the J18- A46 -A4 -A36 route to the J17– A350 – A36 route instead.
- Prohibit HGV through traffic from the Kingsdown – Wild Cross route. Access to RUH for those parishioners without access to non-polluting vehicles is an issue. Public transport improvements would help including greater capacity on the Bradford on Avon to Bath train service; improved bus services into Bath; and a Park and Ride service to the east of Bath.

Consideration should be given to further restrictions on delivery vans.

Limpley Stoke: Concern was expressed at the possible impact on the village from traffic diverting from the A36 to link with the A363/A4/M4 via the B3108, as the B3108 bridge in Limpley Stoke/Winsley Hill would become the closest toll-free crossing of the River Avon to the east of Bath. Sat-navs currently show a short-cut via Woods Hill to access the B3108, which is a narrow and steep, single track road and totally inappropriate for such use. The unacceptable impact on the parish from increased traffic in the event of a future A46-A36 link road was also raised, particularly given the issues with subsidence on the A36.

Winsley: Related to concerns in Limpley Stoke, all traffic diverting from the A36 at Limpley Stoke would come through Winsley on the B3108 where there are already existing concerns about traffic volumes and speeds.

Wingfield: Likely to experience increased traffic on B3109 and/or A366 from traffic rerouting from A36 to avoid tolls in Bath. Both routes pass through the heart of the village.

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 noted the following:

- Low emission zones (LEZs) should be bounded by major arterial roads (this will be the case with the proposed expanded London LEZ where the boundaries will comprise the N and S Circular Roads) so that vehicle have a charge-free route around the zone. The BANES CAZ cuts across main routes. It may be that air quality objectives (AQOs) can be met by running the south and east CAZ boundary along the A36 from the Lower Bristol Road as far east as the junction of the A4 and A36, allowing vehicles to drive around the southern and eastern edge of the CAZ without charge. This will also allow vehicles to reach the RUH from Wiltshire without transiting the zone.

- We support Wiltshire Council's proposal to further evaluate whether a Class C CAZ may meet AQOs. We suggest that BANES implement a Class C zone. If, after a suitable period, this does not meet NOx AQOs, only then upgrade to a Class D CAZ. This will give time to analyse changes in driver behaviour, displacement effects and for drivers to buy less polluting vehicles.
- The A46- A36 link road through the Bathampton Meadows should be part of long term regional traffic planning.

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.

We would like to see an evaluation of the impact on air quality objectives of excluding the A36 from the CAZ. We would also prefer the option of trying a Class C CAZ before extending to a Class D CAZ.

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.

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