



Bath Clean Air Plan

Bath and North East Somerset Council

Draft Report on Public Consultation

674726.BR.042 FBC-25c | DRAFT

December 2019

DRAFT



Bath Clean Air Plan

Project No: Project Number
Document Title: Draft Report on Public Consultation
Document No.: 674726.BR.042 FBC-25c
Revision: DRAFT
Date: December 2019
Client Name: Bath and North East Somerset Council
Client No: Client Reference
Project Manager: RR

Jacobs Consultancy Ltd.

1 The Square, Temple Quay
2nd Floor
Bristol, BS1 6DG
United Kingdom
T +44 (0)117 910 2580
F +44 (0)117 910 2581

www.jacobs.com

© Copyright 2019 Please select a legal entity from the Change Document Details option on the Jacobs ribbon. The concepts and information contained in this document are the property of Jacobs. Use or copying of this document in whole or in part without the written permission of Jacobs constitutes an infringement of copyright.

Limitation: This document has been prepared on behalf of, and for the exclusive use of Jacobs' client, and is subject to, and issued in accordance with, the provisions of the contract between Jacobs and the client. Jacobs accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

Document history and status

Revision	Date	Description	By	Review	Approved
1	13/11/2019	FBC draft	EA, CC, SR	LC, CA, RL	RR
2	13/12/2019	Updated FBC draft	EA, LC	RR, LC	RR

Contents

Acronyms and Abbreviations	6
Executive Summary.....	7
1. Introduction.....	10
1.1 Purpose of this report.....	10
1.2 Context and Background.....	11
1.2.1 Government Directive on Air Quality	11
1.2.2 Identification of a Class C CAZ as the preferred option.....	11
1.3 The consultation process	12
1.3.1 Consultation and engagement objectives	12
1.3.2 First formal consultation.....	12
1.3.3 Second formal consultation	13
1.4 The decision-making process.....	13
1.5 Structure of this report	14
2. Overview of consultation activities.....	15
2.1 Consultation materials	15
2.2 Public consultation event	15
2.3 Meetings with businesses and organisations.....	15
2.4 Press and social media coverage.....	17
2.5 Feedback generated	17
2.5.1 Feedback from the questionnaires	18
2.5.2 Approach to analysis of questionnaire feedback.....	18
2.5.2.1 Qualitative data.....	18
2.5.2.2 Quantitative data.....	18
2.5.3 Feedback from letters and emails	18
3. Overview of respondents to the Questionnaire.....	19
3.1 Overview	19
3.2 Survey size and response rate	19
3.3 Respondent type.....	21
3.4 General information	21
3.4.1 How did you hear about this consultation?	21
3.4.2 Who are you responding to this questionnaire on behalf of?	21
3.4.3 Location of Respondents	23
4. Feedback on change from a Class D CAZ to a Class C CAZ	26
4.1 Context.....	26
4.2 Overview of responses	26
4.2.1 General comments on the implementation of a CAZ scheme.....	26
4.2.2 Support for the change to a Class C CAZ.....	27

4.2.3	Concerns about the Class C proposal	27
4.2.4	Support for a Class D CAZ.....	31
5.	Feedback on proposed Clean Air Zone boundary.....	33
5.1	Context.....	33
5.2	Overview of responses	34
5.2.1	Comments agreeing with the changes made to the boundary	35
5.2.2	Comments disagreeing with the changes made to the boundary	35
5.2.3	Comments expressing the boundary is too big or should be smaller	36
5.2.4	Comments expressing the boundary is too small or should be bigger	36
5.2.5	Comments requesting the inclusion of specific streets / areas in the zone	38
5.2.6	Comments requesting the exclusion of specific streets / areas from the zone	49
5.2.7	Comments expressing other concerns about the boundary	51
6.	Feedback on the Queen Square proposals with associated changes in traffic flows	52
6.1	Context.....	52
6.2	Overview of responses	52
6.2.1	Comments expressing support for the proposals at Queen Square.....	52
6.2.2	Comments expressing concern or reservations about the proposals at Queen Square	53
6.2.3	Comments suggested alterations or alternatives to the Queen Square scheme	56
7.	Feedback on support packages	59
7.1	Context.....	59
7.2	Overview of responses	59
7.3	Feedback on support packages for which funding has already been secured	59
7.3.1	Quantitative analysis.....	60
7.3.2	Qualitative analysis.....	64
7.3.3	Comments on financial support to upgrade older buses	64
7.3.4	Comments on financial support for vehicle upgrades.....	65
7.3.5	Comments on the provision of travel advisors	67
7.3.6	Comments on the provision of anti-idling enforcement.....	67
7.3.7	Comments on the provision of weight restriction enforcement	68
7.4	Feedback on support packages for which funding is yet to be confirmed	69
7.4.1	Quantitative analysis.....	69
7.4.2	Qualitative analysis.....	71
7.4.3	General comments on the proposed support packages	71
7.4.4	Comments on last mile delivery and servicing support.....	72
7.4.5	Comments on incentives for van drivers to use the park and ride sites	73
7.4.6	Comments on additional EV charging points	73
7.4.7	Comments suggesting additional / alternative support packages	74
8.	Feedback on reinvesting revenue.....	76

8.1	Context.....	76
8.2	Overview of responses	76
8.2.1	Quantitative analysis.....	77
8.2.2	Qualitative analysis.....	78
8.2.3	General comments relating to the revenue funded initiatives	78
8.2.4	Comments relating to enhancing the monitoring and evaluation of the scheme.....	78
8.2.5	Comments relating to maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods	79
8.2.6	Comments relating to supporting walking, scooting and cycling to school initiatives and creating school streets	80
8.2.7	Comments relating to supporting and enhancing the public transport network	81
8.2.8	Comments relating to enhancing park and ride sites	82
8.2.9	Comments relating to the other proposed initiatives	83
8.2.10	Comments suggesting other uses for the scheme revenue.....	83
9.	Feedback on the boundary infrastructure	85
9.1	Context.....	85
9.2	Overview of responses	85
9.2.1	General comments relating to the boundary infrastructure.....	85
9.2.2	Comments relating to specifically to the proposed signage.....	86
9.2.3	Comments relating to specifically to the proposed cameras.....	87
9.2.4	Comments suggesting additional signage and cameras	88
10.	Feedback on the draft Charging Order	89
10.1	Context.....	89
10.2	Overview of responses	89
10.2.1	General comments relating to the draft charging order	89
10.2.2	Comments relating to exemptions and concessions proposed in the draft charging order	90
10.2.3	Comments relating to charging / the enforcement of the draft charging order.....	93
11.	Further comments	96
11.1	Context.....	96
11.2	Overview of responses	96
11.2.1	Comments that more action is needed to tackle air quality	96
11.2.2	Comments providing alternatives to the Class C CAZ.....	96
11.2.3	Comments on scheme design	102
11.2.4	Comments on the consultation process and supporting documents.....	103
11.2.5	Other comments	103
12.	Feedback from organisations and businesses	105
12.1	Context.....	105
12.2	Overview of business respondents.....	105

12.3 Overview of organisation respondents..... 106

13. Summary 109

13.1 Summary of feedback 109

13.2 Next steps 110

Appendix A. – Consultation Questionnaire and Leaflet

Appendix B. - Questionnaire data on respondent type

Appendix C. – Summary of businesses and organisations

DRAFT

Acronyms and Abbreviations

ANPR	Automatic Number Plate Recognition
B&NES	Bath and North East Somerset Council
CAP	Clean Air Plan
CAZ	Clean Air Zone
DEFRA	Department of Food and Rural Affairs
DfT	Department for Transport
FBC	Full Business Case
HGV	Heavy Goods Vehicle
JAQU	Joint Air Quality Unit
LGV	Light Goods Vehicle
NO ₂	Nitrogen Dioxide
OBC	Outline Business Case
PRMS	Public Realm and Movement Strategy
RPZ	Residents Parking Zones
SOBC	Strategic Outline Business Case
MaaS	Mobility as a Service
UK	United Kingdom

Executive Summary

Introduction

Bath and North East Somerset Council (B&NES), along with 27 other local authorities, has been directed by Minister Therese Coffey and Minister Jesse Norman to produce a Clean Air Plan (CAP) to achieve air quality improvements in Bath in the shortest possible time. In line with Government guidance, B&NES is working towards the implementation of a Clean Air Zone (CAZ) as part of the CAP, to achieve compliance with legal Nitrogen Dioxide (NO₂) limits.

This report summarises the feedback received from a four-week formal consultation, which ran from 23rd September to 20th October 2019, on a proposal to implement a Class C charging CAZ with traffic management in Bath. A Class C CAZ would charge higher emission Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs), buses, coaches and taxis/Private Hire Vehicles (PHVs) to travel within the city centre.

This was the second phase of formal consultation on a CAZ for Bath. It follows a first phase which took place during autumn of 2018 and sought views on a proposal to implement a Class D charging CAZ. A Class D CAZ would have charged higher emission cars as well as the higher emission vehicles included in a Class C. Following the first phase of consultation the Council agreed not to pursue a Class D CAZ but to instead take forward a Class C CAZ with traffic management. This phase of the consultation also discharged the requirement to engage with stakeholders on the proposed Charging Order.

Both stages of consultation were undertaken in the context of a complex project within which there are a number of fixed constraints governing the actions of the Council. Therefore, there are limits on what is negotiable and the ability to act on feedback.

In this context, the aim of the 2019 consultation process was to:

- Provide an update on the proposals for a Class C CAZ and how these have changed since the first consultation phase.
- Provide details of how the Class C CAZ will operate and the basis of the charging order
- Seek feedback and provide an opportunity for discussion on:
 - The change from a Class D CAZ to a Class C CAZ;
 - The updated CAZ boundary;
 - The Queen Square traffic management proposals;
 - The proposals for supporting measures and reinvestment of revenue;
 - The proposals for signs and cameras; and
 - The details of the draft charging order.

A range of information was published on the Council's website to support the consultation period. This included a non-technical summary document providing an overview of the proposals, a series of frequently asked questions with responses and a range of technical documents. In addition, seven drop-in events were held to provide members of the public, businesses and organisations with an opportunity to talk face to face with the project team about the proposals.

Feedback on the proposal was submitted via a questionnaire which received 597 responses. Letters and emails were also submitted directly to the Council, by businesses, organisations and individuals.

Overview of feedback provided

Overall, respondents showed an understanding of the need to address air quality in Bath, with frequent reference to the government declared climate emergency.

Respondents commented on many aspects of the proposed scheme details. The main themes from the feedback were:

- Opinions on the **Change from a Class D CAZ to a Class C CAZ** were mixed. Some respondents understood the justification for the change and agreed with it, in particular recognising that a Class C CAZ would have a lesser impact on low income groups. However, respondents also had comments or concerns about the Class C proposal, and many were keen to see bolder action and felt that a Class C CAZ would not have the desired effect of sufficiently improving the air quality within Bath.
- Respondents gave opinions on the **boundary**. Overall, the amendments made to the boundary following the autumn 2018 consultation were welcomed. However, some respondents felt that further changes were required with key suggestions highlighting the need for a wider CAZ in order to incorporate and safeguard residential areas. The perceived need to include Sydney Buildings was frequently mentioned.
- Opinions on the **Queen Square traffic management proposals** were mixed. Some respondents suggested that this was a step in the right direction, whereas some felt that the measures could go further, for example that the Square should be pedestrianised completely or the measures should be a permanent feature. Others expressed concern that the proposed measures would increase congestion within the area and result in more traffic using neighbouring residential streets and therefore increase emissions in these areas.
- Opinions on the **support packages and reinvestment of revenue** were mixed. Respondents expressed support for those incentives or reinvestments that included requests for improvements to the public transport, walking or cycling experience (including tackling the school run), park and ride sites and increased provision of electric charging points. Respondents showed less support for initiatives associated with deliveries, particularly incentives for van drivers to use the park and ride sites.
- Respondents made suggestions on **boundary infrastructure** including comments or suggestions on the placement of street signage and cameras. Queries were raised on the implementation and practicality of associated infrastructure.
- Respondents highlighted that improving **alternative modes of transport**, including public transport, walking and cycling should be a key focus both in conjunction to the CAZ and as an alternative method of reducing emissions. There was particular concern that the Class C CAZ charges would mean that bus companies would pass costs to the customer which could deter them from use.
- Concern for the **city of Bath** including its residents and business. Concerns were raised over the movement of pollution into residential areas as vehicles try to avoid the CAZ, with specific mention of 'rat runs'. Concerns for business were also raised due to the impact that the Class C CAZ would have on the cost of deliveries (especially for the smaller traders) and for trades people / the self-employed whose livelihoods depend on the use of certain (often heavy) tools or equipment.
- There was a general consensus in support of any scheme that tackles air quality, but some feeling that **more should be done** to combat emissions in Bath.
- There were a number of **suggestions for alternatives to the proposed scheme**, these included: building a ring road, improvements to traffic management and traffic calming measures within the city and a park and ride to the east of the city.

Implications and next steps

The key themes and issues arising from the consultation have been considered in this report and, where appropriate detail has been provided to explain how the Council intends to respond to the feedback provided.

A decision on next steps lies with elected Cabinet Members and the Government (via the Joint Air Quality Unit, JAQU, who will scrutinise all proposals). The consultation comments are one of a wide variety of considerations that will influence this decision. The comments will be balanced against the findings of technical work, issues relating to funding and deliverability and overall ability to comply with the legal directive. All of this information will be reported in a Final Business Case (FBC).

Consideration of the consultation feedback will, however, remain ongoing throughout the development of the CAZ scheme and during implementation.

1. Introduction

Poor air quality is the largest known environmental risk to public health in the UK¹. Investing in cleaner air and doing more to tackle air pollution are priorities for the EU and UK governments, as well as for Bath and North East Somerset Council (B&NES). B&NES has monitored and endeavoured to address air quality in Bath, and wider B&NES, since 2002. Despite this, Bath has ongoing exceedances of the legal limits for Nitrogen Dioxide (NO₂) and these are predicted to continue until 2025 without intervention.

In 2017 the government published a UK Air Quality Plan for Nitrogen Dioxide² setting out how compliance with the EU Limit Value for annual mean NO₂ will be reached across the UK in the shortest possible time. Due to forecast air quality exceedances, B&NES, along with 27 other Local Authorities, was directed by Minister Therese Coffey (Defra) and Minister Jesse Norman (DfT) in 2017 to produce a Clean Air Plan (CAP). The Plan must set out how B&NES will achieve sufficient air quality improvements in the shortest possible time. In line with Government guidance B&NES is working towards implementation of a Clean Air Zone (CAZ), including both charging and non-charging measures, in order to achieve sufficient improvement in air quality and public health.

Jacobs has been commissioned by B&NES to produce an Outline Business Case (OBC) and Full Business Case (FBC) for the delivery of the CAP; a package of measures which will bring about compliance with the Limit Value for annual mean NO₂ in the shortest time possible in Bath. The OBC assessed the shortlist of options set out in the Strategic Outline Case³, and proposed a preferred option including details of delivery. The FBC develops the preferred option set out in the OBC, detailing the commercial, financial and management requirements to implement and operate the scheme. The OBC and FBC form a bid to central government for funding to implement the CAP.

1.1 Purpose of this report

This report summarises the feedback received from a four-week formal consultation, which ran from 23rd September to 20th October 2019, on a proposal to implement a Class C charging CAZ in Bath. The report provides information on:

- the format of the consultation, including the consultation materials published and the events held;
- the overall number of responses received;
- the quantitative data generated by the questionnaires;
- the qualitative feedback given via questionnaires;
- the feedback received via letters and emails; and
- how the comments received have been considered by the Council.

This report is intended to be a stand-alone document. It provides a factual overview and summary of the comments highlighted during the consultation and includes detail to explain how these comments have been considered.

¹ Public Health England (2014) Estimating local mortality burdens associated with particular air pollution.
<https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution>

² <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

³ Bath and North East Somerset Council Clean Air Plan: Strategic Outline Case, March 2018
http://www.bathnes.gov.uk/sites/default/files/siteimages/Environment/Pollution/strategic_outline_case_bath_28.03.2018_with_annexes.pdf

1.2 Context and Background

1.2.1 Government Directive on Air Quality

The United Kingdom (UK) has in place air quality legislation, passed down from the European Union (EU), to ensure that certain standards of air quality are met. The legal limit for concentrations of NO₂ is 40 µg/m³ as an annual mean. This legal limit is breached across a number of cities in the UK, including at several locations in Bath.

As mentioned in the introduction above, Bath and North East Somerset Council (B&NES), along with 27 other local authorities, was directed by Minister Therese Coffey and Minister Jesse Norman in 2017 to produce a Clean Air Plan (CAP) to achieve air quality improvements in Bath in the shortest possible time. In line with Government guidance B&NES is working towards the implementation of a Clean Air Zone (CAZ) as part of the CAP, to achieve compliance with legal Nitrogen Dioxide (NO₂) limits.

As such, consultation on proposals for a CAZ for Bath have been undertaken in the context of a complex project within which there are a number of fixed constraints governing the actions of the Council. Therefore, there are limits on what is negotiable and the ability to act on feedback.

The constraints include:

- B&NES is mandated by central Government to take action on air quality and to bring concentrations of NO₂ to below 40 µg/m³ as an annual mean in the shortest possible time and by 2021 at the latest;
- The Council may face potential fines or legal action if it does not put into place a package of measures to address air quality within this time frame;
- Technical work undertaken at an early stage showed that a charging CAZ is the only mechanism capable of reducing emissions to appropriate levels within the required timescale;
- Various scenarios have been considered, including a proposal (which was the focus of the first phase of consultation) for a Class D CAZ which would impose a charge on non-compliant private cars, heavy goods vehicles (HGVs), light goods vehicles (LGVs), buses, coaches and taxis/private hire vehicles (PHVs). However, the latest technical work has shown that a Class C CAZ, with traffic management at Queen Square, would enable compliance with air quality legal limits in the shortest possible time and a Class C CAZ (exempting private cars) was approved by Bath and North East Somerset Council in March 2019;
- A CAZ would need to be implemented in line with the principles set out in the Government's 'Clean Air Zone Framework'. This document, published in 2017, explains the approach that Local Authorities should take when introducing a zone;
- A charging order is required as the legal basis for enforcing the CAZ. This must follow legal/statutory procedures;
- Funding for a CAZ is dependent upon the Government's Joint Air Quality Unit (JAQU) approving a Full Business Case (FBC). There are also strict rules on how the funding available can be spent; and
- Subject to approval by elected members, the final decision on the detail of the CAZ proposal will be made by the minster, taking account of feedback from JAQU.

1.2.2 Identification of a Class C CAZ as the preferred option

In Spring 2018, the Council asked the public for feedback on a strategic outline business case (SOC) which included consideration of the following charging zone options (as outlined in the government's Clean Air Zone Framework):

- Charging Class B CAZ - A zone charging higher emission buses, coaches, taxis, private hire vehicles and HGVs;
- Class C CAZ - As per B including higher emission vans and minibuses; and
- Class D CAZ - As per C including higher emission private cars.

Early technical modelling in the summer of 2018 revealed that a Class B CAZ would not achieve compliance within the legal timeframe and that a Class C CAZ would have left two NO₂ hot spots in the centre of Bath exceeding legal thresholds. A Class D CAZ was therefore seen as the best course of action to urgently reduce risks to health and to meet the government's directive.

In Autumn 2018, the proposal for a Class D CAZ was the subject of an extensive public consultation receiving over 8,400 responses. The outcome of this consultation identified a strong feeling that charging private cars would have a disproportionate impact on the economy and lower income households, and many respondents requested that the Council look again at whether it was possible to exempt cars while meeting the air quality targets.

Following further detailed technical work, the project team identified that a Class C CAZ would result in just one exceedance at Gay Street and developed an alternative scheme to address this. By combining a Class C CAZ with temporary traffic management at Queen Square it was shown that it would be possible to reduce NO₂ levels at Gay Street to within legal limits in the shortest possible time.

In March 2019, two options were presented to cabinet in an Outline Business Case (OBC): the original Class D CAZ; and a Class C CAZ with temporary traffic management at Queen Square. The cabinet approved the Class C CAZ with temporary traffic management at Queen Square alongside a number of supporting measures. The Class C CAZ therefore became the proposed scheme and the focus of subsequent technical analysis.

1.3 The consultation process

1.3.1 Consultation and engagement objectives

B&NES has committed to engaging the public and stakeholders at every stage of the development of the CAP and the implementation of a CAZ. The aim of the consultation and engagement process is to ensure everyone in the area has an opportunity to express their views and share opinions. The consultation and engagement objectives are to:

- Have ongoing dialogue with stakeholders, residents, businesses and the wider community to raise the profile of the air quality problem in Bath, generate an understanding of the associated health impacts, the proposed measures to improve air quality, and the possible implications for travel choices; and
- Seek feedback at key stages of the Clean Air Plan and, where possible, utilise this in the technical assessment.

1.3.2 First formal consultation

The first phase of formal consultation took place during autumn of 2018 and sought views on a proposal to implement a Class D charging CAZ. A Class D CAZ would have charged higher emission cars as well as the higher emission vehicles included in a Class C.

During the Autumn 2018 consultation, over 8,400 responses providing varied feedback were received. Many respondents recognised the need to improve air quality in Bath and some of the feedback demonstrated support for action to tackle these issues. However, much of the feedback highlighted concerns about a charging scheme in principle, in particular the financial impact that charging private cars would have on city centre residents and lower income groups in particular. Many comments were made about the details of the proposed scheme and in

particular respondents felt that adjustments were needed to the boundary and the classifications of vehicles charged as many concerns with the financial implications of charging were raised.

Following the first phase of consultation the Council agreed not to pursue a Class D CAZ but to instead take forward a Class C CAZ with traffic management. In response to the consultation feedback a range of changes were also made to the CAZ boundary.

The results of the Autumn 2018 consultation are set out in two reports available on the Council's website: [The Report on Formal Public Consultation](#) which is a summary of the feedback; and the [Consultation Response Report](#) which responds to the comments made during the consultation.

1.3.3 Second formal consultation

This report documents the second formal consultation (Autumn 2019). This consultation is an important part of the process of developing the CAZ proposals because it contains details of the charging order, which is the legal documentation required for the enforcement of the zone.

The aim of the 2019 consultation process was to:

- Provide an update on the proposals for a Class C CAZ and how these have changed since the first consultation phase;
- Provide details of how the Class C CAZ will operate and the basis of the charging order;
- Seek feedback and provide an opportunity for discussion on:
 - The change from a Class D CAZ to a Class C CAZ;
 - The updated CAZ boundary;
 - The Queen Square traffic management proposals;
 - The proposals for supporting measures and reinvestment of revenue;
 - The proposals for signs and cameras; and
 - The details of the draft charging order.

1.4 The decision-making process

As noted above, B&NES is legally bound to take action to tackle air quality issues in the shortest possible time.

All decisions on the CAP and any measures to be implemented to improve air quality will be taken by local elected Members, via the B&NES Cabinet. This decision will consider Officer recommendations and take account of:

- The legal direction of the Council;
- The overall objectives of the CAP;
- Government guidance, including DEFRA's Clean Air Zone Framework;
- The Equalities Impact Assessment;
- Feedback from Government through JAQU;
- The availability of funding;
- The economic and financial impacts of any actions;
- The results of technical assessments and modelling; and
- The feedback received during the consultation process.

Once a decision is made by the Cabinet, implementation of any measures will be dependent upon:

- The minister's approval of the FBC (effectively the document required to secure the funding to implement the scheme) taking account of feedback from JAQU; and
- Completion of any legal requirements.

1.5 Structure of this report

This report follows the structure of the consultation questionnaires. Following this introduction:

- Chapter 2 provides an overview of the consultation activities undertaken;
- Chapter 3 summarises the responses to the questionnaire;
- Chapter 4 discusses the change from a **Class D CAZ to Class C CAZ**;
- Chapter 5 discusses the changes to the **boundary**;
- Chapter 6 discusses the **Queen Square proposals** with associated changes to traffic flows;
- Chapter 7 sets out the various **support packages** which are separated between funded and funded;
- Chapter 8 considers the **additional supporting measures to be funded by any reinvested revenue** of the scheme;
- Chapter 9 discusses the **boundary infrastructure** such as the cameras and signage locations;
- Chapter 10 considers the **draft Charging Order**;
- Chapter 11 discusses **further comments** relating to the scheme and other comments received;
- Chapter 12 summarises the feedback provided by organisations and businesses; and
- Chapter 13 summarises this report and clarifies the next steps.

2. Overview of consultation activities

This chapter provides an overview of the activities that supported the four-week consultation period on the proposed Class C CAZ, between 23rd September and 20th October 2019, and the types of feedback this generated.

2.1 Consultation materials

The consultation was launched on the 23rd September. The following information was published on the Council's website:

- A 20-page summary consultation booklet which included a background of the Class C with traffic management scheme, changes to the boundary since the last Autumn 2018 consultation and details of the proposed exemptions, concessions, support packages and initiatives to be supported by revenue;
- A range of information to summarise the technical data on the website including frequently asked questions; and
- A questionnaire seeking feedback.

Both the consultation booklet and questionnaire were also made available in hard copy in Council offices and libraries and at consultation events.

2.2 Public consultation event

A range of events were held during the four-week consultation period, to provide opportunities for people to ask questions about the proposals and find out more information. These took the form of drop-in sessions held in public locations. These sessions were open to all, with no booking required and provided an opportunity for people to speak informally with members of the project team.

These events were advertised on the project webpages, in newsletters, newspapers and via social media posts. Specific invitations were also sent to stakeholders, community groups and organisations via email.

A list of the seven public consultation events and approximate number of attendees is shown in Table 2-1.

Table 2-1: Overview of the public consultation events

Event	Date	Time and Location	Approximate number of attendees
Drop in	24/09/2019	09:30 – 12:30, Magnet Car Park, Bath	33
Drop in	25/09/2019	16:00 – 19:00, Bathampton Methodist Church	4
Drop in	03/10/2019	16:00 – 19:00, St Saviour's Church, Larkhall	35
Drop in	08/10/2019	16:00 – 19:00, Twerton Village Hall	9
Drop in	10/10/2018	16:00 – 19:00, St Mary's Church Hall, Bathwick	44
Drop in	14/10/2019	16:00 – 19:00, Bathampton Methodist Church	19
Drop in	17/10/2019	16:00 – 19:00, All Saints Centre, Weston	31

2.3 Meetings with businesses and organisations

The project team attended (on request) a range of additional meetings and briefing sessions with groups and organisations. These are summarised in Table 2-2.

Table 2-2: Additional engagement meetings – groups and organisations

Engagement meetings with groups and organisations	Date
Cycle Bath	27/11/2018
Taxi drivers	03/12/2018
Emergency services (Police and Fire)	16/01/2019
Coach operators (CT coaches and centurion)	22/01/2019
B&NES Events team	24/01/2019
Transport operator (Toyota)	28/01/2019
Dorothy House Hospice Care	30/01/2019
Camden Residents Association	31/01/2019
Bath Bus Company	31/01/2019
Road Haulage Association	01/02/2019
Royal United Hospitals Bath	06/02/2019
Public transport providers (car clubs, taxis, bus operators)	20/02/2019
FirstGroup	01/03/2019
Bath Clean Air Roadshow	06/03/2019
Homerun	11/03/2019
Cycle Bath	12/03/2019
Coach operators	20/03/2019
Road Haulage Association and Freight Transport Association	08/04/2019
Highways England	10/04/2019
Bristol City Council	24/04/2019
Bath Independent Traders	25/04/2019
Road Haulage Association and Freight Transport Association	01/05/2019
Faresaver	02/05/2019
Wiltshire Council	13/05/2019
FirstGroup	15/05/2019
Coach operators	21/05/2019
Police	22/05/2019
UK100 group	07/06/2019
Pulteney Estate Residents Association	19/06/2019
Clean Air Day	20/06/2019
Van Driver	24/06/2019
Local Takeaway Business	25/06/2019
Freight Transport Association	28/06/2019
Police	03/07/2019
Bath Bus Company	05/07/2019
Coach operator (Arleen JVA)	18/07/2019
Bathwick Councillors	01/08/2019
Sydney Place Residents Association	02/08/2019
Bathwick Hill Residents Association	16/08/2019
Energy Saving Trust	21/08/2019
Larkhall Greengrocers	02/09/2019

Engagement meetings with groups and organisations	Date
St Andrews School	09/09/2019
Bath Taxi Association	19/09/2019
Road Haulage Association	23/09/2019
Bath Business Improvement District	30/09/2019
Bath Clean Air Roadshow	03/10/2019
Sydney Buildings Householders Association	10/10/2019
Cycle Bath	17/10/2019
Bath Bus Company	17/10/2019
Taxi drivers (drop in event)	18/10/2019
FirstGroup (phone conference)	28/10/2019
Coach operators	29/10/2019
Freight Transport Association	30/10/2019
Taxi drivers (drop in event)	04/11/2019
Royal United Hospitals Bath	Multiple
University of Bath	Ongoing collaboration
WECA	Ongoing liaison

2.4 Press and social media coverage

During the consultation period there was coverage in both the press (television, newspaper and online publications) and on social media. The Council briefed the press, issued press releases and promoted the consultation through its own social media accounts. Coverage was also initiated by other external groups and organisations.

Views expressed via the press or social media are not considered in this report.

2.5 Feedback generated

The consultation generated feedback in a variety of formats as shown in Table 2-3. In some cases, organisations completed both an online questionnaire and sent a letter (in which case both are reported here). Where duplicate letter and email responses were submitted, only one response has been counted. However, there are a very small number of instances where respondents have answered the questionnaire, as well as submitting an email or letter, in which case both are included in the overall count.

Table 2-3: Feedback received

Format of responses	Number of responses
Online questionnaire	570
Hard copy questionnaires (note: these were manually entered into the online system)	27
Letters and emails	65
Total number received	661

2.5.1 Feedback from the questionnaires

Copies of the consultation questionnaires used to generate feedback are included in Appendix A. The questionnaire included a combination of multiple choice and free text questions. Each question was accompanied by summary information, helping the respondent to understand each aspect of the proposal. The comments from the hard copy questionnaires were manually entered into the online system.

Chapter 3 gives an overview of each question asked and provides a profile of the respondents. The detailed feedback provided by respondents via the questionnaires, letters and emails is then summarised on a topic by topic basis in chapters 4 to 11.

2.5.2 Approach to analysis of questionnaire feedback

The feedback received from the questionnaires has been analysed, summarised and presented depending on its original format:

- **Quantitative data** – Responses to multiple choice questions from the questionnaires are reported factually and in numerical format; and
- **Qualitative data** – The majority of the feedback provided via the questionnaires was qualitative in nature, written within open text responses. This has been analysed using the method described below, to help facilitate production of a manageable overview of all the feedback provided.

2.5.2.1 Qualitative data

To effectively process the large volume of qualitative feedback, a system of categorising and grouping comments was adopted. Comments were allocated to categories, on a question by question basis. The categories were defined based on the nature and type of the comments received, not on the pre-defined topics, meaning the system of grouping comments responded directly to the feedback provided. The categorised and grouped comments were then used in the preparation of the summary text presented in the following chapters of this report.

Where comments made within a particular question did not relate specifically to the topic of that question, these comments were reallocated to the most appropriate question and reported alongside the main feedback provided in that part of the questionnaire and in the appropriate corresponding chapter of this report.

Within this report the qualitative comments made are documented in a summarised and abbreviated format in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments within this document does not imply any order, priority or weighting.

2.5.2.2 Quantitative data

The quantitative data generated by the closed questions within the questionnaires has been tabulated and reported. Quantitative data received in questions 4 (supporting measures), 5 (supporting measures) and 6 (additional revenue) has been reported within the corresponding chapters of this report.

Data received in response to the “about you” sections of the questionnaire have partially been reported in chapter 3 with additional data provided within Appendix B.

2.5.3 Feedback from letters and emails

Feedback from letters and emails (including those received up to 5 working days after the consultation closed) was considered in a similar way to that received via the qualitative questions of the questionnaires. Comments were summarised and reported in the corresponding topic chapter, alongside the data from the qualitative questions of the questionnaires. An overview of the letters and emails received from organisations and businesses are further reported in chapter 12, with more details outlined in Appendix C.

3. Overview of respondents to the Questionnaire

3.1 Overview

This chapter provides a profile of the respondents who completed the questionnaire for individuals and groups. It reports on the closed text questions relating to respondent characteristics, their vehicle and the way they travel. It should be read in conjunction with Appendix B, which provides further detail on the characteristics of respondents.

Detailed comments made on key topics are presented in chapters 4 to 11. These chapters include a summary of the responses to the open text questions, alongside any related closed text questions.

A copy of the questionnaire for individuals and groups (including businesses and other organisations) is included in Appendix A. The questionnaire contained the following questions:

- **Question 1** asked respondents to comment on the change from a Class D CAZ to a Class C CAZ.
- **Questions 2** asked respondents to comment on the proposed boundary changes of the CAZ giving specific reference to certain streets or areas.
- **Question 3** asked respondents to comment on the Queen Square proposals with associated changes in traffic flows.
- **Question 4 & 5** asked respondents to identify if they fell into certain groups that would be eligible to receive certain packages of financial or practical support with the chance to expand on their answers with any further comments.
- **Question 6** asked respondents to rank their level of support for the outlined initiatives (funded by any reinvested revenue of the CAZ)
- **Question 7** asked respondents to comment on any signage and camera placement giving specific details of certain streets or areas.
- **Question 8** asked respondents to give their feedback on information contained within the draft charging order or summarised in the consultation leaflet, giving detail on the theme they are commenting on (exemption, concession etc).
- **Questions 9**, gave respondents the opportunity to give make comments on the scheme details as summarised in the consultation leaflet
- **Questions 10 to 26** asked for more information about the respondent including whether they were responding on behalf of a business or organisation, what vehicles they drive, where they live within Bath, their postcodes etc.

3.2 Survey size and response rate

Overall, 597 questionnaires were returned. Table 3-1 provides an overview of the response rate to each question. It shows that many respondents skipped questions, suggesting that they had comments to make on specific topics only.

Table 3-1: Response rate to each question

Question	No. of respondents who completed this question	Response rate (% of 597 survey respondents)
Q1: Comments on change from Class D to Class C	337	56%
Q2: Comments on the proposed boundary changes of the CAZ	279	47%
Q3: Comments on the Queen Square proposals with associated changes in traffic flows	247	41%
Q4: Feedback on about support packages for which funding has been secured	314	53%
Q5: Feedback on support packages subject to final confirmation of funding from central government	260	44%
Q6: Comments on how revenue from the zone will be reinvested	438	73%
Q7: Comment on boundary infrastructure (signage and camera placement)	104	17%
Q8: Feedback on the draft charging order	116	19%
Q9: Any further comments on scheme details	262	44%
Q10: How the respondent heard about the consultation	503	84%
Q11: Who the respondent was responding on behalf of	514	86%
Q12: Whether the respondent was authorised to respond on behalf of their business / organisation	41	7%
Q13: Location of business / organisation relative to the zone	38	6%
Q14: First half of the business / organisation's postcode	36	6%
Q15: Second half of the business / organisation's postcode	34	6%
Q16: Whether the business / organisation respondent owned, operated or relied on vehicles in the centre of Bath	38	6%
Q17: Employment sector of the business / organisation respondent	37	6%
Q18: Main vehicle operated by respondent	464	78%
Q19: Location of respondent's home address relative to the zone	458	77%
Q20: First half of respondent's postcode	450	75%
Q21: Second half of respondent's postcode	437	73%
Q22: Working status of respondent	459	77%
Q23: Age of the respondent	465	78%
Q24: Whether the respondent had any dependent children	454	76%
Q25: Whether the respondent considered themselves to have a long-term condition limiting day-to-day activities?	460	77%
Q26: How the respondent defined their gender	458	77%

3.3 Respondent type

This section reports responses to question 10 (how the respondent heard about the consultation) and question 11 (who the respondent was responding on behalf of). Appendix B contains additional information relating to businesses respondents such as location and business type (question 12 to question 17), as well as additional information relating to other respondents including vehicle driven, location and age (question 18 to question 26).

3.4 General information

3.4.1 How did you hear about this consultation?

Question 10 asked respondents how they heard about the consultation. Of the 597 survey respondents, 503 (84%) responded to the question. The majority of respondents (37%) suggested that they heard about the consultation through the postcard however, five respondents used the open text box to state that they did not receive a postcard. (which could be the case if they did not receive other post). Postcards were sent using a Royal Mail Door to Door marketing campaign. Other comments in the open text box included that the respondent had heard about the consultation through presentations from councillors or through residents' associations.

Table 3-2: Respondents to Question 10 – how did you hear about this consultation?

	Number of respondents	Percentage of survey respondents
Respondents that answered Question 10	503	84%
Respondents that skipped Question 10	94	16%
Postcard (sent to all addresses and some neighbouring addresses in B&NES)	220	37%
Word of mouth	81	14%
Social media e.g. Facebook or twitter posts from media/friends/the Council	76	13%
Other	73	12%
Local media e.g. radio, television or printed newspaper	43	7%
Prefer not to say	10	2%

3.4.2 Who are you responding to this questionnaire on behalf of?

Question 11 asked respondents who they were responding on behalf of. Of the 597 survey respondents, 514 (86%) responded to the question. The majority of respondents (74%) identified themselves as residents whilst only 4% of respondents identified themselves as responding on behalf of a business or organisation. Respondents predominately used the open text box to identify businesses or organisations they represented which included residents' associations, political parties and councillors, schools, transport providers and others.

Table 3-3: Respondents to Question 11 – who are you responding on behalf of?

	Number of respondents	Percentage of survey respondents
Respondents that answered Question 11	514	86%
Respondents that skipped Question 11	83	14%
As a resident	439	74%
Commuter	27	5%
On behalf of a business/organisation (this includes taxi drivers, sole traders and the self-employed)	23	4%
On behalf of a group of individuals	19	3%
Tourist / visitor / student	6	1%

Businesses, organisations and groups also responded to the consultation via letter and email. Table 3-4 below lists those which provided their names. Feedback from these respondents is reported throughout this report in topic Chapters and further detail can be found within Appendix C.

Table 3-4 Businesses, organisations and groups responding to the consultation

List of business, organisation and group respondents to consultation (via questionnaire, letter and email)	
Arleen Coach Hire & Services Ltd	King Edward's School, Bath
Bath and North East Somerset Green Party	Lansdown Crescent Association
Bath Chauffeur Services	Local Councillor for Lansdown Ward
Bathampton Parish Council	M.A.C. Gardening Services
Bathampton Primary School safer routes to school group	Melksham Without Parish Council
Bradford on Avon Streets Ahead	Midsomer Norton Scout Group
British Vehicle Rental and Leasing Association (BVRLA)	Monkton Farleigh Parish Council
Clean Slate	MSN & RAD CSVT
Cllr for Winsley and Westwood	New Road Service Station Ltd, t/a Real Coach Hire
Coach Operator	Pulteney Estate Residents Association (PERA)
Councillor for Moorlands Ward	Road Haulage Association
D&H Motorcycles	Saltford Parish Council
Falcone Ltd	Shelly's airport transfers
Federation of Bath Residents Associations (FoBRA)	Sprocket and Friends Dog Walking
Federation of British Historic Vehicle Clubs (FBHVC)	St Andrew's Church School
Go South Coach	St James Square Association, Cavendish Road Association, Cavendish Crescent Association, Lansdown Crescent Association
Grain Trade lorries to surrounding farms	St James's Square Bath Limited
Greenway Residents Association	Sydney Buildings Householders Association
High Littleton Parish Council	Sydney Place Residents Association et al.
Holt & Staverton division of Wiltshire Council	The Abbey Residents Association (TARA)

List of business, organisation and group respondents to consultation (via questionnaire, letter and email)	
Holt Parish Council	The Silver Shop of Bath
J East Gardens	UPS
KERB II Bradford on Avon analysis group	Winsley and Westwood Division, Wiltshire Council
Keynsham Town Council	Winsley Parish Council

3.4.3 Location of Respondents

Questions 13, 14, 15 (businesses) and 19, 20 and 21 (individuals) asked respondents where they lived or where their business was based and asked them to provide the first four digits of their postcode. Table 3-5 and Table 3-6 below break down how respondents would describe their location in relation to four options presented.

Table 3-5 breaks down the business respondents. Of the 42 business respondents to the survey, 38 (90%) responded to the question, it shows that almost equal numbers were from "In the revised zone (see map)", "In Bath but outside the zone", "In B&NES but not in Bath", "In a neighbouring authority".

Table 3-6 breaks shows the location of the individual respondents. It shows that of the 472 individual respondents to the survey, 457 (97%) responded to this question. Of these 261 (55%) stated they lived "In Bath but outside the zone", with a further 111 (24%) stating they lived "In the revised zone (see map)". The remaining 85 (18%) respondents all lived outside of Bath.

Table 3-5: Respondents to question 13 – where is your business/organisation?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 13	38	90%
Respondents that skipped Question 13	4	10%
In the revised zone (see map)	11	26%
In B&NES but not in Bath	10	24%
In a neighbouring authority	9	21%
In Bath but outside the zone	8	19%

Table 3-6: Respondents to question 19 – where do you live?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 19	457	97%
Respondents that skipped Question 19	15	3%
In Bath but outside the zone	261	55%
In the revised zone (see map)	111	24%
In B&NES but not in Bath	54	11%
In a neighbouring authority	27	6%
Further afield	4	1%

In order to get a better idea of where within these areas respondents live, the postcode data provided by the majority of respondents was used, some respondents did not provide their postcode. Table 3-7 shows the number of businesses and individuals that have respondents to the survey broken down by their postcode. The fourth figure of their postcode has been used for those within BA1 and BA2 due to the higher density of residents in these areas and their proximity to the zone. Figure 3-1 shows a visual representation of this data, focussed in on Bath and the area surrounding the zone.

Table 3-7: The location of the respondents based on the postcode data provided

Postcode	Description	No. Businesses Respondents	% of Business Respondents	No. Individual Respondents	% of Individual Respondents
BA1 1	Bath City Centre	1	3%	3	1%
BA1 2	Royal Victoria Park	3	8%	39	9%
BA1 3	Newbridge and Combe Park	2	5%	14	3%
BA1 4	Weston and Upper Weston	0	0%	9	2%
BA1 5	Lansdown and Walcot	1	3%	27	6%
BA1 6	Fairfield Park and Larkhall	1	3%	35	8%
BA1 7	Batheaston and Bathford	0	0%	17	4%
BA1 8	Swainswick and Charmy Down	0	0%	1	0%
BA1 9	Kelston and Lansdown Hill	0	0%	3	1%
BA2 0	Farmborough, Timsbury and Camerton	0	0%	4	1%
BA2 1	Twerton and Whiteway	1	3%	11	2%
BA2 2	Moorlands, Kingsway and Odd Down	2	5%	44	10%
BA2 3	Oldfield Park and East Twerton	0	0%	23	5%
BA2 4	Bear Flat and Lower Bathwick	2	5%	46	10%
BA2 5	Fox Hill and Combe Down	0	0%	12	3%
BA2 6	Bathampton, Bathwick and Widcombe	6	16%	77	17%
BA2 7	Claverton Down, Midford, Limpley Stoke and Hinton Charterhouse	0	0%	12	3%
BA2 8	Peasdown St. John and Wellow	2	5%	7	2%
BA2 9	Englishcombe, Newton St. Loe and Marksbury	0	0%	3	1%
BA3	Midsomer Norton, Radstock, Chilcompton, Holcombe and Highbury	3	8%	12	3%
BA4	Shepton Mallet, Pilton, Evercreech and Ditchat	0	0%	1	0%
BA5	Wells, Wookey and Westbury-sub-Mendip	0	0%	1	0%
BA12	Warminster, Mere and Codford	1	3%	0	0%
BA13	Westbury, Bratton and Dilton Marsh	0	0%	1	0%
BA14	Trowbridge, Staverton, Holt, Hilperton and North Bradley	2	5%	0	0%
BA15	Bradford-on-Avon, Winsley and Westwood	4	11%	18	4%
BA16	Street	0	0%	1	0%

Postcode	Description	No. Businesses Respondents	% of Business Respondents	No. Individual Respondents	% of Individual Respondents
BS30	Longwell Green, Cadbury Heath, Warmley and Wick	0	0%	1	0%
BS31	Keynsham and Saltford	2	5%	7	2%
BS39	Paulton, Clutton, Bishop Sutton and Pensford	0	0%	5	1%
BS40	Blagdon, Langford, Wrington, Winford, Chew Magna and Chew Stoke	0	0%	2	0%
SN10	Devizes, Market Lavington and Potterne	0	0%	1	0%
SN12	Melksham, Bowerhill and Whitley	1	3%	0	0%
SN14	Chippenham, Marshfield and Colerne	0	0%	1	0%

It can be seen in Figure 3-1, the highest number of both businesses and individual respondents were seen in BA2 6, which includes both Bathwick and Bathampton. This is followed by Widcombe and Lyncombe (BA2 4) and Odd Down (BA2 2). The highest number of respondents from inside the zone was observed in BA1 2, with very few respondents from directly within the city centre.

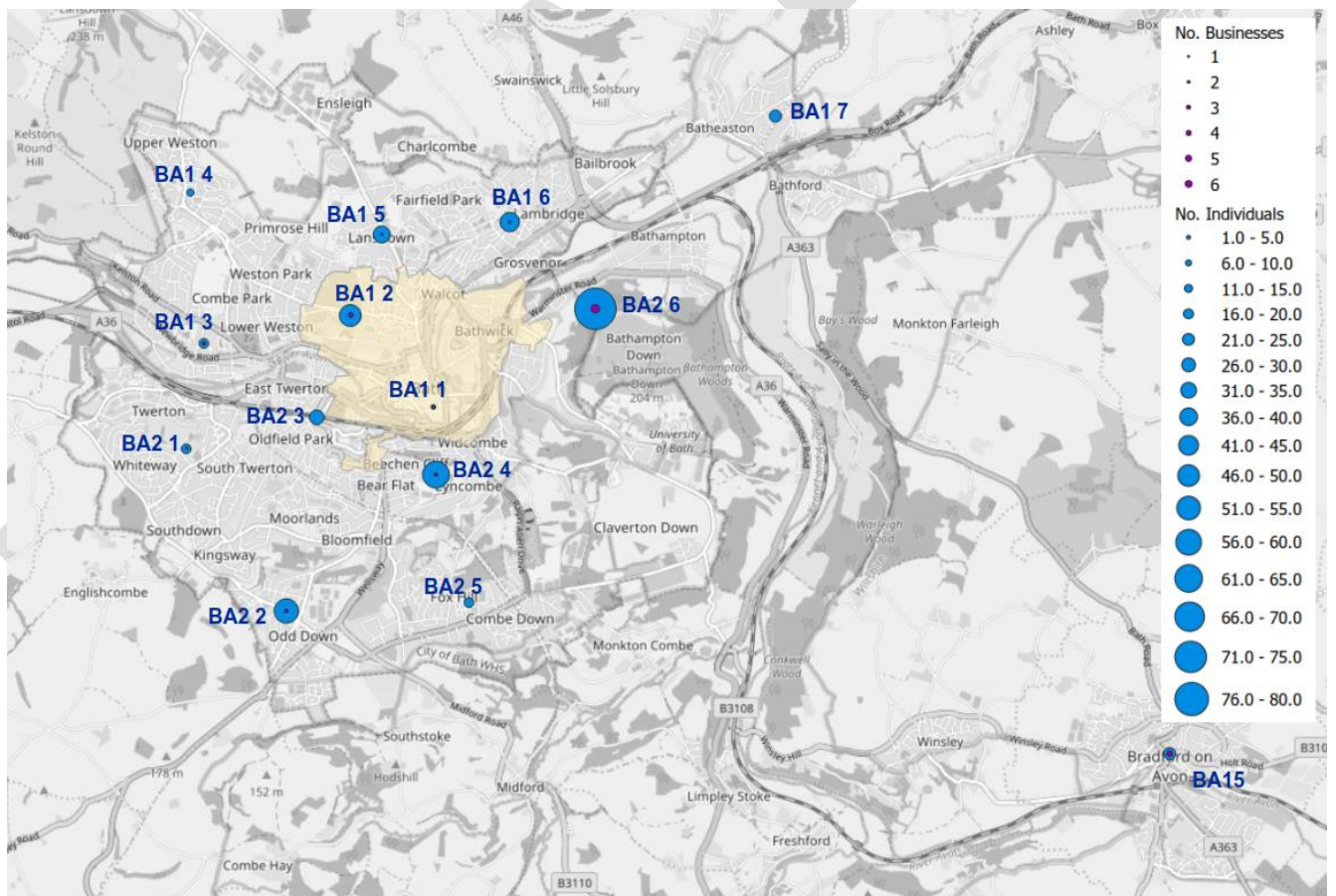


Figure 3-1: A visual representation of the postcode data received from the respondents

4. Feedback on change from a Class D CAZ to a Class C CAZ

4.1 Context

Question 1 asked respondents to provide their comments on the change from a Class D to a Class C CAZ. Question 1 was asked via an open text box which allowed respondents to give their feedback on the change in CAZ Class.

In March 2019 the Council approved the introduction of a Class C CAZ for Bath. The change from the Class D to a Class C followed an extensive consultation process that took place in the Autumn of 2018. This consultation received over 8,400 responses and it was suggested by many respondents that a Class D CAZ would have a disproportionate impact on the economy and lower income households.

4.2 Overview of responses

Of the 597 questionnaires returned, 337 (56%) commented on Question 1. Comments on the change from a Class D to a Class C CAZ were also submitted by letter and email.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Overall, opinions on the **change from a Class D CAZ to a Class C CAZ** were mixed. Generally, respondents understood the justification for the change and agreed with it, in particular recognising that a Class C CAZ would have a lesser impact on low income groups. Bathampton, Winsley and Salford Parish Councils, along with Keynsham Town Council were in support of the change to Class C CAZ.

However, respondents expressed concerns and comments about the Class C proposal, with many keen to see bolder action and felt that a Class C CAZ would not have the desired effect of sufficiently improving the air quality within Bath. Some suggested that a Class D CAZ would be needed in the future or set out alternative ideas for other strategies to improve air quality.

4.2.1 General comments on the implementation of a CAZ scheme

Some respondents made general comments about the implementation of a CAZ. Comments included:

- Implementing a CAZ is essential to achieving clean air in Bath as it is a valley prone to air stagnation;
- A CAZ would help to reduce the large volume of traffic transitioning through the city;
- A CAZ is a 'money making exercise for B&NES that does not align with the Council's vision of being 'an exemplar of sustainable transport'';
- The whole scheme should be scrapped, as only those who are more affluent will be able to afford any charges;
- It seems to be a system whereby you pay to pollute;
- The problem lies with the commercialisation of Bath City Centre, with more economic activity comes more traffic (and pollution);
- Support for / understanding of the implementation in order to improve air quality, however it could cause stress to those who cannot afford the charges;
- The geography of Bath (a basin prone to stagnant air) is a physical limitation to improving air quality that the Council should recognise; and

- Suggestion that new technology will soon be introduced and therefore a CAZ scheme will be viewed as an 'old fashioned method' to improve air quality.

4.2.2 Support for the change to a Class C CAZ

Respondents showed support for/understood the reasons for the change to a Class C CAZ. Reasons for supporting the change from Class D to Class C included:

- A Class C CAZ minimises the impact on certain (often vulnerable) groups, less able to pay a charge or afford a newer (less polluting) vehicle as previously required. A Class D CAZ went too far, so a Class C CAZ is preferred;
- A Class C CAZ allows the residents of Bath to undertake their daily activities without hindrance;
- A Class C CAZ is a step in the right direction to tackle air quality within Bath;
- The change from Class D to Class C is more likely to be implemented due to less challenge from those who do not support the charging of cars;
- A Class C CAZ seems to be the best option to improve air quality that is available to the Council at the present time;
- The implementation of a CAZ will help to encourage alternative modes of transport in particular cycling, which will become viable with less traffic numbers and pollution;
- The change from a Class D to a Class C will help to prevent any parking issues that might have arisen from charging private cars to drive within the city centre; and
- Acknowledgement that tackling an issue such as air quality is difficult to undertake at a local level and therefore this is perhaps one of the best options available.

Bathampton Parish, Saltford Parish, Winsley Parish and Keynsham Town Councils also outlined their support for the change from a Class D CAZ to a Class C.

Respondents supported the change from Class D to Class C, however felt that certain improvements to other aspects of the city were also necessary such as:

- Improvements and encouragement to use more sustainable methods of transport such as public transport, walking and cycling is needed to improve overall air quality; and
- Suggestion that further monitoring be undertaken when traffic flows have settled to determine if amendments (such as charging all vehicles) should be implemented.

4.2.3 Concerns about the Class C proposal

Respondents also provided a range of other comments on the change from a Class D CAZ to a Class C CAZ, some expressing concerns or questions about the proposed Class C CAZ. A summary of the comments is provided in Table 4-1.

Table 4-1: Concerns about the Class C CAZ

Comment / issue / question raised	Response/ how addressed
Suggested alterations to the Class C CAZ	
<p>Respondents felt that additional steps should be taken in addition to the Class C CAZ, such as:</p> <ul style="list-style-type: none"> • Additional measures to be implemented at peak traffic hours • Additional deterrents for all higher emission vehicles 	<p>Additional measures are not required at this time, modelling shows that a Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time.</p>

Comment / issue / question raised	Response/ how addressed
Continual monitoring of the effectiveness of the scheme is needed with amendments if necessary	The Class C CAZ would be subject to detailed monitoring. See FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC for full details of the proposed monitoring as part of this scheme.
A blanket 20 mph speed limit should be implemented throughout the whole CAZ area	This is not required to achieve compliance. Any future changes to speed limits could be considered as part of the wider transport strategy for Bath.
Allow residents who own a non-compliant van to apply for a permit/travelcard that will allow them to drive charge free or allow them free public transport until they are able to upgrade or change their vehicle to a compliant one	Financial assistance will be available to non-compliant van drivers to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession.
<p>Suggestions that a gradual move to a Class D CAZ is needed. Phasing in the scheme would:</p> <ul style="list-style-type: none"> • Ensure sufficient time for the planning and change of vehicles/modes of transport/lifestyle • Improve public and political acceptability 	<p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy. A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to these groups.</p> <p>FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC provides details of the proposed monitoring and evaluation of the scheme, including corrective action processes to be followed if the scheme is not having the predicted impact. This will verify that the scheme meets the legal direction of compliance in the shortest possible time. The corrective action plan describes a range of options, including altering the class of CAZ if considered the most appropriate solution. Corrective action will only be considered if the monitored outcomes of the scheme are more adverse than anticipated.</p>
Comments concerning businesses and (non-compliant) vehicles drivers	
Respondents raised concerns about the impact of a Class C CAZ on the local economy. Respondents showed concern that a Class C CAZ would negatively impact smaller local business within the area. They perceived that businesses would be forced to increase the cost of their services/produce, resulting in customers 'shopping' elsewhere. This could also mean loss of employment for smaller local business due to loss of trade.	<p>Financial assistance will be available to vehicle owners with non-compliant vans to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession. The Council is also requesting funding to provide alternative delivery and servicing options for local businesses and travel advisors to support those affected by the CAZ.</p> <p>The impact to the local economy is considered within the Economic Case contained in the main FBC document.</p>
Concern over the classification of HGV vs LGV as some larger LGVs could incur higher costs if not charged correctly	Classification of vehicles is determined by the manufacturers and those vehicle classes charged under a Class C CAZ follow the Clean Air Zone Framework. There will be a vehicle checker tool provided by central government in early 2020 to help determine if a vehicle is eligible for a charge.
There is concern for small HGV operators who could be disproportionately impacted due to practical upgrade concerns, including financial burden and commercial impact. There is concern that those unable to replace their vehicles will have to increase their mileage to avoid the zone or pay the charge to continue to access areas such as rural Wiltshire via the CAZ.	Financial assistance will be available to non-compliant drivers to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession. The Council is also requesting funding to provide alternative delivery and servicing options for local businesses and travel advisors to support those affected by the CAZ.

Comment / issue / question raised	Response/ how addressed
<p>Concern that the scheme will not deter commercial vehicles within the city as the fines are not high enough.</p>	<p>The methodology for determining the proposed charge rates for all vehicle types is discussed fully in FBC-13 'T3 Methodology Report' in Appendix E of the FBC.</p> <p>These are selected as the minimum charges required to address the air quality exceedances within Bath and are expected to bring about compliance in the shortest possible time.</p>
<p>Concern that costs would be passed onto the customers using their services. Concern that costs cannot be absorbed by businesses and will either be passed to the customer or HGV operators will go out of business</p>	<p>Financial assistance will be available to non-compliant drivers to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession. B&NES is also requesting funding for alternative delivery and servicing options, including delivery and servicing plans, last mile delivery and electric van hire, including designated parking bays.</p>
<p>There was some concern that the scheme is not targeting the right vehicles because:</p> <ul style="list-style-type: none"> • Businesses rely on vans and HGVs for deliveries and cannot be undertaken in other ways; • There is no other practical route for commercial vehicles to avoid the charge; and • Some larger private vehicles are just as/more polluting than vans. 	<p>Financial assistance will be available to non-compliant drivers to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession.</p> <p>B&NES is also requesting funding for alternative delivery and servicing options, including delivery and servicing plans, last mile delivery and electric van hire, including designated parking bays.</p>
<p>Comments concerning the impact of a Class C CAZ on residents of the city and surrounding areas</p>	
<p>The change to Class C CAZ is likely to increase traffic, maintain pollution problems, and/or lead to rat runs in some areas. In particular problems were perceived on/at: A36; Acorns Forest School; B3107; B3108; Bear Flat; Belgrave Crescent; Bennetts Lane; Brassknocker Hill; Camden Road; Church Street (Widcombe); Eastbourne Avenue; Egerton Road; Englishcombe Lane; Entry Hill; Greenway Lane; Guinea Lane; Hensley Road; Julian Road; Lansdown Lane; London Road; Lyncombe Vale Road; Marlborough Buildings; Marlborough Lane; North Road; Park Lane; Pennyquick Road; Prior Park Road; Rosemount Lane; Rush Hill; Shophouse Road; St John's Road (Bathwick); St Mark's Road; The Paragon; Toll Bridge Road; Widcombe Primary School; Windsor Bridge; and Weston Lane</p> <p>Respondents noted that there have already been fatalities along some of these roads due to inappropriate vehicles using them. In addition, it was noted that some streets are appropriate for heavy vehicles due to Georgian underground vaults/Georgian facades.</p>	<p>Overall air quality will be improved across B&NES.</p> <p>It is not anticipated that there will be any significant changes in traffic flows as a result of this scheme. Overall the Class C CAZ is expected to have a lesser potential knock on impact for rerouting than a Class D CAZ would have (as it does not affect private cars).</p> <p>See FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC for full details of the proposed monitoring for this scheme.</p>
<p>Concern that residents in the following outlying areas will suffer disproportionate impacts due to a perception that traffic in these areas will increase. Areas mentioned included: Bathampton; Batheaston; Bradford on Avon; Claverton Down; Combe Down; Egerton; Hayesfield Park; Holt; Limpley Stoke; Melksham; Monkton Farleigh; Newbridge; Odd Down; Sally in the Woods; Southdown; Staverton; Twerton; West Wiltshire; Westbury; Weston; Whiteway; and Winsley</p> <p>Respondents suggested that B&NES work with neighbouring authorities to ensure that air quality within the surrounding areas</p>	<p>It is not anticipated that there will be any significant changes in traffic or rerouting as a result of this scheme across the Bath and wider Wiltshire area. Overall the Class C CAZ is expected to have a lesser potential knock on impact for rerouting than a Class D CAZ would have (as it does not affect private cars).</p> <p>See FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC for full details of the proposed monitoring for this scheme.</p>

Comment / issue / question raised	Response/ how addressed
are not adversely affected by the implementation of the Class C CAZ	The Council will continue to engage with neighbouring authorities throughout the implementation stage of the scheme.
Concerns that non-compliant vehicles will park outside of the zone affecting areas such as: Greenway Lane; and Bear Flat	The Council intends to undertake a review of the existing RPZ system, which will consider interaction with the CAZ. Overall the Class C CAZ is noted to have a lesser potential knock-on impact for parking than a Class D CAZ.
Respondents expressed concern that commercial vehicles/businesses will pass on the charge of the CAZ to their customers resulting in increased bus and taxi fares.	<p>The Council is offering support to help taxi drivers to achieve compliance and, in this way, it is hoped that fares will not increase as a result of the CAZ. It should be noted that Hackney carriage fares are regulated by the local authority.</p> <p>The Council is working closely with bus operators to help them secure funding from the Government to upgrade their engines. It is anticipated that all buses will be compliant by the time a zone is introduced, and that operators will respond without price rises..</p>
Co-ordination with sat nav companies is needed to ensure the CAZ is properly understood by sat nav systems and to ensure that not all traffic is re-routed outside of the zone, especially if they are compliant.	It is understood that central government is co-ordinating with mapping companies, such as Google, to reflect CAZs.
Concern that residents that drive non-compliant vehicles (such as campervans) will have to move and/or change their lifestyles to avoid paying the CAZ charge.	Financial assistance will be available to non-compliant drivers to enable them to replace their vehicle. Those not eligible for this support will be eligible for a registered concession.
General Concerns / General Comments	
Respondents expressed concern that this is a way of implementing the infrastructure required for a Class D CAZ and that the introduction of a Class D CAZ will gradually be implemented.	<p>A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to vulnerable groups.</p> <p>FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC provides details of the proposed monitoring and evaluation of the scheme, including corrective action processes to be followed if the scheme is not having the predicted impact. This will verify that the scheme meets the legal direction of compliance in the shortest possible time. The corrective action plan describes a range of options, including altering the class of CAZ if considered the most appropriate solution. Corrective action will only be considered if the monitored outcomes of the scheme are more adverse than anticipated.</p>
B&NES has declared a climate emergency and should be doing more to tackle air quality.	The Council has committed to providing the leadership to enable Bath and North East Somerset to achieve carbon neutrality by 2030, with one of its immediate priorities being a major shift to mass transport, walking and cycling in order to reduce vehicle emissions. As set out in the September 2019 Cabinet report, it is proposed that any surplus revenue generated by the enforcement of the scheme will be held in a Revenue Reinvestment Reserve. Allocation of this revenue will be managed by a Steering Group and there is opportunity for reinvestment to directly or indirectly facilitate the achievement of various transport policies. These are set out in the Joint Local Transport Plan, Getting Around Bath- a Transport Strategy for Bath and Balancing your needs- a Parking Strategy for Bath and North East Somerset and are available on

Comment / issue / question raised	Response/ how addressed
	the Council's website. These policies include schemes to reduce the use of private vehicles which will further contribute to a reduction in carbon dioxide generated by traffic.
Concern that the CAZ could increase trips by private car. If buses are charged and costs are passed onto the customer whilst cars can continue to drive in the city centre for free, the attractiveness of travelling by public transport could decrease whilst the attractiveness of travelling by car could increase.	The Council is working closely with bus operators to secure funding from the Government to upgrade their engines. It is anticipated that all buses will be compliant by the time a zone is introduced, and that operators will respond without price rises.
Concern that other emissions (such as particulates) are not being tackled by the CAZ.	The Direction the Council received from central Government was to reduce NO ₂ exceedances in the shortest possible time. Other Council strategies are in place to monitor these pollutants and currently show no breach of legal limits. However, as part of the technical assessment, potential impacts of the scheme on other pollutants are considered, and the scheme is predicted to reduce the quantum of CO ₂ emissions released into the atmosphere. FBC-11 'AQ3 Air Quality Modelling Report' in Appendix D of the FBC also indicates that there will be no risk of particulate matter exceedance in 2021 (the year of NO ₂ compliance).
The scheme does not accept that cars are necessary for certain trips, and that the use of walking/cycling/public transport is not always available/the most viable option.	The proposed class C CAZ will not charge drivers of private cars.
The resultant scheme fails to meet the ClientEarth test that the NO ₂ levels will in all probability be reduced below legal limits in the shortest possible time.	The primary Critical Success Factor for the scheme is to deliver compliance with NO ₂ air quality Limit Values and Local Air Quality Management Air Quality Objectives in the shortest possible times. This is the key consideration when selecting the preferred option for the Bath Clean Air Plan and technical assessment undertaken of the proposed scheme meets this requirement.

4.2.4 Support for a Class D CAZ

Whilst many respondents acknowledged the reasons for the change to a Class C CAZ, others felt that the originally proposed Class D CAZ or a variation of it would be a better solution.

Table 4-2: Support for a Class D CAZ

Comment / issue / question raised	Response/ how addressed
<p>Implementation of a Class D CAZ should be reconsidered with exemptions or reduced charging rates for:</p> <ul style="list-style-type: none"> residents; those on benefits; key workers (public employees); and the elderly. <p>Exemptions to be phased out over a pre-determined period.</p> <p>Implementation of a Class D CAZ with the following amendments:</p> <ul style="list-style-type: none"> an optional residential one-off payment which increases over time to encourage residents to purchase compliant vehicles; 	<p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy.</p> <p>A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to these groups.</p> <p>Offering large scale concessions within a class D CAZ, would compromise the ability to reduce air quality to within legal limits in</p>

<ul style="list-style-type: none"> • reinvestment of revenue into the city, such as subsidised bus fares; • alteration of the boundary to exclude 'less well-off' areas of the city; • implementation of a two stage CAZ akin to the London LEZ/ULEZ; • a Class C CAZ moving into a Class D CAZ at a later date; • charges just applied to larger vehicles such as 4x4s; • phasing in charges; and • highest polluters pay the most. 	<p>the required timescales. This is because the air quality levels predicted for a Class D CAZ leave little scope for additional concessions.</p> <p>See FBC-25b OBC Consultation Response Report in Appendix Q of the FBC for further detail on previously considered variations on a Class D CAZ.</p>
<p>Concern that the decision to change from a Class D CAZ to a Class C CAZ was politically motivated and shows no regard for the real issue of air quality or making a difference within Bath</p>	<p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy. This prompted a detailed review of a Class C CAZ option.</p> <p>With further refinements to the air quality modelling, along with inclusion of a traffic management scheme at Queen Square, a Class C CAZ was found to also achieve compliance in the shortest possible time. Central government guidance suggests that the minimum class of CAZ needed for compliance should be implemented, whilst minimising the impact on the local economy and lower income households. A decision by the cabinet in March 2019 took this scheme forward as the preferred option.</p>
<p>Concern that public attitudes have now changed when it comes to air quality (due to the declaration of a climate emergency) and therefore a Class D CAZ would be a better (and now more supported) option.</p> <p>Respondents cited a range of reasons for why private cars should be charged. Some felt that charging all vehicles would be fairer, others felt it would have a more significant impact.</p> <p>Some felt that charging cars would encourage more people to change their vehicle and would have more overall impact on congestion.</p>	<p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy. This prompted a detailed review of a Class C CAZ option.</p> <p>With further refinements to the air quality modelling, along with inclusion of a traffic management scheme at Queen Square, a Class C CAZ was found to also achieve compliance in the shortest possible time. Central government guidance suggests the Council should implement the minimum class of CAZ needed for compliance, whilst minimising the impact on the local economy and lower income households. A decision by the cabinet in March 2019 took this scheme forward as the preferred option.</p>

5. Feedback on proposed Clean Air Zone boundary

5.1 Context

Question 2 asked respondents to provide their comments on the changes to the boundary made in both March 2019 and June 2019.

The changes made in March 2019 were as a result of residents' feedback during the previous first phase consultation period, with those in June 2019 being proposed due to technical reasons. They are detailed below and shown in Figure 5-1.

March 2019

- Inclusion of Pulteney Estates residents' association area
- Exclusion of Cranhill Road and Rivers Road
- Inclusion of Oldfield Road/A367 junction area
- Inclusion of Bathwick Estates residents' association area
- Inclusion of Sydney Gardens residents' association area

June 2019

- Inclusion of Sydney Wharf
- Inclusion of Raby Mews
- Inclusion of Sydney Mews
- Inclusion of Raby Place/Bathwick Hill (west of the canal)

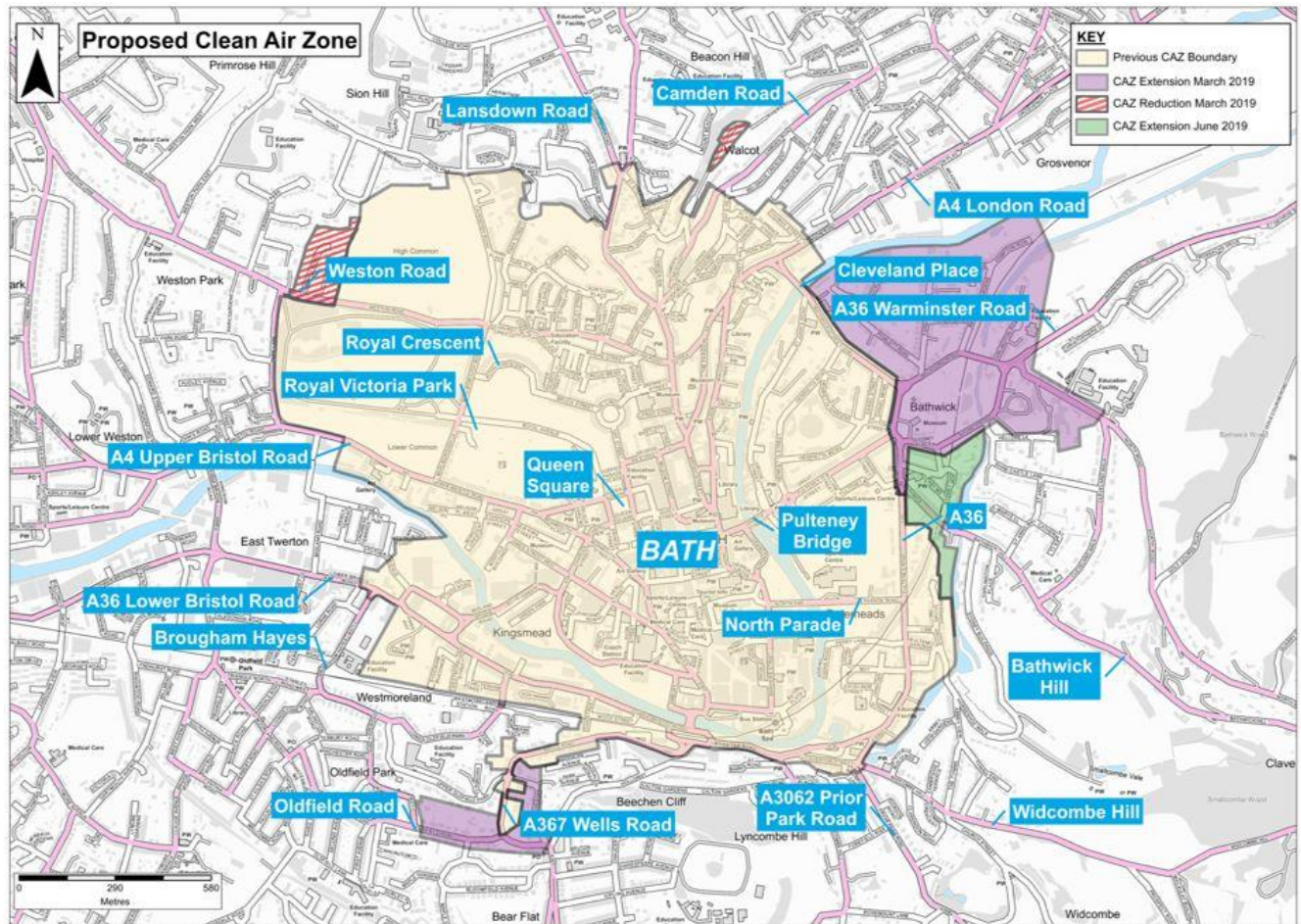


Figure 5-1: B&NES CAZ Boundary presented in the consultation questionnaire

5.2 Overview of responses

Of the 597 questionnaires submitted, 279 (47%) respondents commented on question 2. Comments on the boundary were also submitted by letter and email.

Within this chapter comments are summarised to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Overall, the amendments made to the boundary following the autumn 2018 consultation were welcomed. However, some respondents felt that further changes were required with key suggestions highlighting the need for a wider CAZ in order to incorporate and safeguard residential areas. The perceived need to include Sydney Buildings was frequently mentioned. Conversely, some respondents expressed concern about specific locations being included within the CAZ boundary and about the CAZ affecting some specific journeys, in particular through trips.

The majority of residents' associations who responded by letter and email were supportive of the boundary changes, particularly mentioning approval of extension into Bathwick and Pulteney Estates. The residents' associations who responded favourably to the boundary changes include: Federation of Bath Residents Associations (FoBRA) Sydney Place, Sydney Buildings Householders Association, The Abbey (TARA), Pulteney

Estates (PERA), Greenway and Lansdown Crescent. FoBRA and Sydney Buildings both requested that additionally Sydney Buildings should be included within the boundary.

5.2.1 Comments agreeing with the changes made to the boundary

Respondents here suggested they agreed with the changes to the boundary labelled in Figure 5-1. Respondents comments stated that they agreed with:

- Inclusion of Pulteney Estates residents' association area, Bathwick Estates residents' association area and Sydney Gardens residents' association area (March 2019);
- Inclusion of Sydney Wharf, Raby Mews, Sydney Mews, Raby Place/Bathwick Hill (June 2019);
- Inclusion of Oldfield Road/A367 junction area (March 2019); and
- Generally stating all or not being specific about which changes they agreed with.

Further detail on the comments is provided below:

- Inclusion of Pulteney Estates residents' association area, Bathwick Estates residents' association area and Sydney Gardens residents' association area (March 2019):
 - Residents stated they supported the inclusion of Bathwick, Sydney Gardens, Pulteney Estate and St John's Lane. Respondents thought including this area would help improve the poor air quality in the area and avoid additional rat running.
 - Federation of Bath Residents Associations, Pulteney Estate Residents Association, The Abbey Residents Association, Sydney Place Residents' Association, Sydney Place Action Group and Clean Air for Bathwick Campaign also responded to voice their support for the changes.
- Inclusion of Sydney Wharf, Raby Mews, Sydney Mews, Raby Place/Bathwick Hill (June 2019):
 - Sydney Place Residents' Association, Sydney Place Action Group and Clean Air for Bathwick Campaign supported the inclusion of this area to reduce the impact of signage in the area and to align with the RPZ.
 - Appreciation for the benefit to resident's health and the environment but did not agree with the reason given for the extension.
- Inclusion of Oldfield Road/A367 junction area (March 2019):
 - Respondents stated they supported the inclusion of this area to stop rat running and increased traffic through the 20-mph area, Junction Road and Moorland Road, Lyncombe. Respondents also felt Oldfield Road should not be classified as a B road and is not a suitable diversion route. This issue is subject to separate discussion with Highways Teams.
- Generally stating all or not specific about which changes they agreed with:
 - Respondents stated here that they supported any/all extensions or changes to the boundary, or that that boundary is a big improvement, a better zone and the zone area is perfect.
 - Some respondents felt potential rat-runs had been included. However, other respondents felt concerned that some rat runs had not been captured or asked for some areas/streets to be included, these have been captured in Table 5-2 below.

5.2.2 Comments disagreeing with the changes made to the boundary

Respondents here suggested they disagreed with any of the changes to the boundary labelled in Figure 5-1. Respondents comments stated that they disagreed with the changes:

- Inclusion of Pulteney Estates residents' association area, Bathwick Estates residents' association area and Sydney Gardens residents' association area (March 2019); and
- Generally stating all or not specific about which changes they disagreed with.

Further detail on the comments providing alternative scheme suggestions are provided in Table 5-1.

Table 5-1: Comments disagreeing with the changes made to the boundary

Comment / issue / question raised	Response/ how addressed
Inclusion of Pulteney Estates residents' association area, Bathwick Estates residents' association area and Sydney Gardens residents' association area	
Respondents did not agree that Pulteney Estate Residents Association Area or Sydney Gardens should be included as the A36 in Bathwick needed to be open for business traffic. Respondents were concerned these vehicles would divert on the B1308 through Winsley which was inappropriate.	As stated in FBC-25b 'OBC Consultation Response Report' Appendix Q of the FBC, a sensitivity test was conducted which showed that the removal of the Cleveland Bridge / A36 and A4 link from the zone, this resulted in a maximum concentration of 40.8 µg/m ³ of NO ₂ , which is above the required air quality targets. Traffic modelling suggests there will be minimal changes in traffic flows as a result of a Class C CAZ.
Inclusion of Oldfield Road/A367 junction area	
Including Oldfield Road/A367 junction will add to issues in Moorfields and Moorlands with rat running past schools and family homes. This change now includes Hayesfield Park, which seems to be only to stop it becoming a rat-run, which is not necessary. Hayesfield Park should be removed from the CAZ and residents/access only signs should be used instead.	There is a small risk of some additional traffic using Moorfields and Moorlands as a route between A367 Wellsway and A36 Lower Bristol Road. However, there are several alternative routes available for this journey, on larger and more appropriate roads. As such, any additional usage would be limited to a few drivers trying to route east-west around this edge of the zone. The entirety of Hayesfield Park has been included to make it very clear to drivers that entering the road will lead them to entering the CAZ and gives them a clear diversion route down A367. If the boundary was at the north of Hayesfield Park, there is a chance that drivers would become entrapped into entering the zone.

5.2.3 Comments expressing the boundary is too big or should be smaller

Respondents provided general comments expressing that the boundary is too big or should be smaller. Respondents expressed concern that they would have to drive around the city or to Bristol to reach amenities such as supermarkets, which would increase their carbon footprint. Respondents were also concerned that rat running would occur around the edges of the zone as people looked to avoid the charge; respondents felt this could be dealt with by implementing Low Traffic Neighbourhoods around the edge of the boundary. Respondents also stated concerns about the potential adverse effect on local businesses, due to the size of the zone.

5.2.4 Comments expressing the boundary is too small or should be bigger

Respondents provided comments stating the boundary is too small or should be bigger. Further detail on the comments stating the boundary is too small or should be bigger, are provided in Table 5-2.

Table 5-2: Comments expressing the boundary is too small or should be bigger

Comment / issue / question raised	Response / how addressed
General comments that the boundary is too small or should be bigger	
Respondents asked for the zone boundary to be much bigger / wider / extended to a larger perimeter as this would be better or in order to create maximum effect.	A larger zone is not necessary to achieve compliance with the air quality targets and any larger zone would have the potential to impact many more businesses and residents than is necessary. The boundary has been designed as far as possible to reduce the effect on rat running. Assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, albeit there is a slight increase in expected usage in some areas.
Concern that the clean air zone is not big enough and will cause rat runs around it.	
Requests for further information on why some residential areas have been included within the boundary and some have not. It is noted that many residents have raised concerns about being used as cut throughs if not included within the CAZ boundary.	
The boundary should be as large as possible to prioritise the health benefits for children.	
Comments requesting that the zone should cover all of Bath	
The zone should be expanded to cover the whole of Bath / all the residents of Bath / include all of the suburbs. Otherwise, it displaces the problem from the more prosperous and touristy areas to the residential areas where pollution will widen health inequalities and have a bigger environmental impact.	A zone covering the entirety of Bath is not necessary to achieve compliance with the air quality targets. If it were to be the size of Bath, it would impact many more businesses and residents than is necessary. It would also cause a very large increase in the amount of infrastructure required, and as a result would be unlikely to be implemented in the required timescale. The boundary has been designed as far as possible to reduce the effect on rat running. Assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, albeit there is a slight increase in expected usage in some areas.
This scheme is very meek, it should include the whole of the World Heritage Site.	
Other specific requests for size of the zone being larger	
The bigger the zone the better. However, if a Class D proposal was to be proposed at a later date, the boundary should be adjusted to exclude low income families due to the large potential impact.	A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to vulnerable groups. Corrective action – such as altering the class of CAZ or extending the boundary – will only be considered if the monitored outcomes of the scheme are worse than anticipated.

Comment / issue / question raised	Response / how addressed
<p>The current boundary will force drivers of non-compliant vehicles to skirt the area of the CAZ by using roads adjacent to its boundary. For example, on the south side of Bath this includes Cleveland Walk, Bathwick Hill, Sydney Buildings, Horseshoe Walk, Abbey View, The Tynning, Church Rd, Church St, Rosemount Lane, Lyncombe Vale, Lyncombe Vale Rd, Greenway Lane, Junction Rd, Upper Oldfield Park, Lower Oldfield Park and Brougham Hayes. Despite being partially covered by the zone, an uncharged route is still available on Wells Way, Wells Road and Oldfield Rd. Similarly, to the north Larkhall, Richmond Road, Charlcombe, Lansdown Rd, Sion Rd, Winifred's Lane, Cavendish Rd, Marlborough Buildings and Marlborough Lane. Any scheme should include the entire city, as defined by city ward boundaries.</p> <p>Also encourage the placement of the zone to reduce short journeys for school drop offs and directing commercial traffic away from the city centre where possible.</p>	<p>Some of the main thoroughfares in Bath city centre are inside the zone, therefore it is expected that non-compliant commercial traffic will take the earliest and most appropriate diversionary route to avoid the zone. The boundary has been designed, as far as possible, to reduce the effect on rat running. Assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, albeit there is a slight increase in expected usage in some areas.</p> <p>The CAZ no longer charges private cars so it is unlikely that extending the zone to cover schools would make a significant difference to areas during school drop off times.</p>

5.2.5 Comments requesting the inclusion of specific streets / areas in the zone

Comments reported here are a combination of those from respondents either requesting the inclusion of specific streets/areas in the zone and concern about specific streets/areas being excluded from the zone. These comments were categorised firstly by their electoral ward in B&NES, as can be seen in Figure 5-2, and then by the street / area mentioned by the respondent.

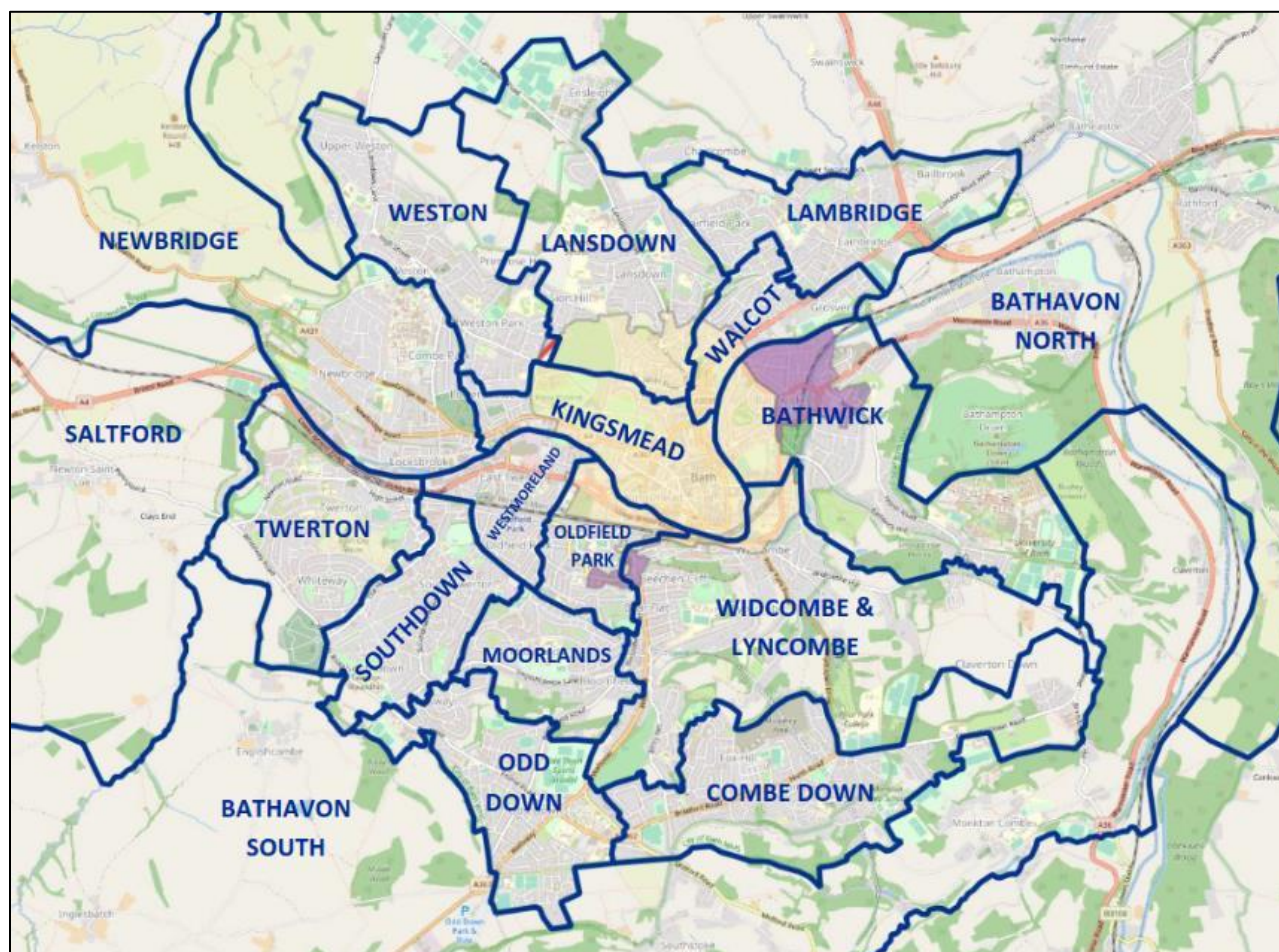


Figure 5-2: B&NES Electoral Wards

The majority of respondents who completed Question 2 made comments requesting the inclusion of additional streets or areas within the CAZ. Overall, concerns for areas not included in the zone and requests to extend the zone outweighed comments requesting for streets to be removed from the zone. The most mentioned request was for Sydney Buildings to be included in the zone. Individual residents put forward this request and a formal consultation response was also submitted by Sydney Buildings Householders' Association.

Further detail on the comments requesting the inclusion of specific streets/areas in the zone, broken down by electoral ward is provided in Table 5-3 below.

Table 5-3: Comments requesting the inclusion of specific streets / areas in the zone

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
Bathavon North	
Respondents requested the inclusion of this area and were concerned about the exclusion of Bathampton as it is already congested. Respondents felt that non-compliant vehicles would now travel over the River Avon through Bathampton , causing more congestion and pollution. Respondents felt that this was inappropriate due to the narrow nature of the route through	<p>The issues around inclusion of this area are covered in the FBC-04 Boundary Updates Technical Note in Appendix A of the FBC. A summary is provided below.</p> <p>Similar issues were raised in response to the autumn 2018 consultation. The additional work undertaken at that time, to</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
<p>Bathampton, which may lead to it becoming blocked, as well as its proximity to local schools.</p> <p>Include Batheaston or the village will see additional traffic not going through the city centre.</p> <p>Concern Bathampton is being allowed to become a rat run which will have a detrimental impact on air quality, congestion and safety in the village. They are particularly concerned about HGVs that may route inappropriately through the village and have difficulties trying to turn around.</p> <p>The impact of rat running on neighbouring areas has not been considered. Concern that no impact assessment for Bathampton has been undertaken.</p>	<p>consider the issues in Bathampton, concluded that inclusion of this area is not required to deliver air quality compliance by 2021. Re-assessment of the traffic modelling results showed that the expected diversionary impacts of a Class D CAZ (as proposed at that time) were not high or severe, albeit there is a slight increase in expected usage. It was noted also that the ability for extra traffic to be accommodated on the toll bridge is heavily constrained by the capacity of the bridge itself. It should also be noted that a Class C will have a lesser potential knock-on impact, due to the lower number of vehicles affected by CAZ charges.</p> <p>Extending the CAZ boundary out to Bathampton would not be practical via a continuous extension of the zone, as this would necessitate the inclusion of additional residential and business areas (meaning additional residents and businesses would be impacted). There are also issues with providing an adequate turn-back opportunity. Therefore, if included, Bathampton would need to form a separate 'outlier' zone. This would likely set a precedent for the inclusion of other sub-zones.</p> <p>An amendment here is not proposed for this reason. However, this area will be closely monitored. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
<p>A respondent was concerned that Charlcombe Lane could become a rat run.</p>	<p>An extension of the zone to include Charlcombe Lane would require a significant extension of the zone to the north of London Road, adding a large quantity of infrastructure. Assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, especially due to the tight nature of the route and its designation as unsuitable for heavy goods vehicles.</p>
Bathwick	
<p>Respondents asked for Bathwick Hill to be included due to concern it would become a rat run with people using it as a drop-off point near the town centre. Respondents also wanted the pollution of buses along Bathwick Hill to be dealt with, which are seen as exacerbated due to its steepness.</p> <p>Respondents asked for North Road to be included as they felt it would become a rat run for LGVs and taxis. Respondents were also concerned about the potential for HGVs to turn in North Road, endangering pedestrians and children. Respondents also expressed that cycling conditions, already bad on North Road, would become worse with additional traffic.</p>	<p>There is a small risk of some additional users using residential streets as a route between North Road, Bathwick Hill and Widcombe Hill. However, these three routes converge and meet to the east at Combe Down. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone.</p> <p>Increasing the boundary to the University of Bath is not required to achieve compliance with air quality limits and will also require a significant increase in infrastructure which is likely to lead to implementation of the zone being delayed.</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
It was requested that the boundary be drawn up to the University of Bath to avoid rat running in Widcombe and Bathwick.	
<p>Respondents felt Cleveland Walk should be included or it will be used as a rat run.</p> <p>Request for Sham Castle Lane to be included so it doesn't become a car park for non-compliant vehicles.</p> <p>Suggestion that St. Ann's Way should be included so it doesn't become a car park for non-compliant vehicles.</p>	<p>There is a small risk of some additional traffic using Cleveland Walk, Sham Castle Lane and St. Ann's Way as a route between Bathwick Hill and North Road. However, these two routes converge and meet to the east at Combe Down. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone. One end of Sham Castle Lane (junction with Sydney Road) is also within the zone which will act as a deterrent.</p>
<p>Respondents requested Sydney Buildings to be included in the zone as they felt it would form part of a rat run at the last opportunity to avoid entering the zone. Respondents felt as a result, Sydney Buildings, already congested in peak times, would become even busier. Respondents felt this would be a serious risk to residents, tourists and children on Sydney Buildings. Respondents thought Sydney Buildings was already used as a meeting point for tradesmen before taking LGVs to a job, and this could become worse with non-compliant LGVs. Respondents expressed that an increase in the number of non-compliant vehicles would lead to decreased air quality for residents on Sydney Buildings and this was unacceptable.</p> <p>Respondents also felt Sydney Buildings should be included in order to align the boundary to Residents' Parking Zone 2.</p>	<p>There is a small risk of some additional traffic using Sydney Buildings, Horseshoe Walk and The Tynning as a route between Bathwick Hill and Widcombe Hill. However, these two routes converge and meet to the east at Combe Down. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone. Church Street, which would form the logical extension of this rat-run to Prior Park Road, is narrow, so would act as a significant deterrent.</p> <p>An amendment here is not proposed for this reason. However, this area will be closely monitored. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
Request for Sydney Place to be included or non-compliant vehicles will use the road.	Sydney Place is already within the zone.
Respondents felt that Warminster Road (A36) should be included further, to the east of St Mary's Primary School playground.	Most of the traffic passing along Warminster Road continues through or comes from the Cleveland Place junction which is within the CAZ boundary. As such, the effect of improved vehicle compliance on air quality will be felt indirectly along the remainder of the Warminster Road anyway.
Kingsmead	
Concern that Marlborough Lane would become a rat run for non-compliant vehicles.	Marlborough Lane is already within the zone.
Concern that if Park Lane was excluded it would become dangerously busy for users of Victoria Park . They noted that vehicles are already speeding on Park Lane and this may increase.	There is a small risk of some additional traffic using Park Lane as a route between Weston Road and Upper Bristol Road. However, there are several other routes further from the CAZ boundary that make this journey possible. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone.
Midland Road Recycling Centre should be included in the zone to stop a long queue of idling vans and cars which can be seen here.	Midland Road Recycling Centre is a vital service for residents of and businesses in Bath and as such should remain outside the CAZ.
Lambridge	

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
<p>Claremont Road should be included to stop large vehicles using it to avoid the zone.</p> <p>Concern that Fairfield Park was not included and may see additional traffic as a result.</p> <p>Respondents felt Larkhall should be included to avoid old and polluting vehicles from using it as a rat run and a parking area on the edge of the CAZ</p>	<p>There is a small risk of some additional traffic using Claremont Road as a route between London Road and Lansdown Road. However, this route is indirect and uses small and tight roads and is therefore, unlikely to be used as a route by non-compliant vehicles.</p>
<p>The zone should include Lambridge.</p> <p>Concern about the exclusion of Eldon Place as it is already a rat run which contains two schools.</p>	<p>Including Lambridge would require a significant extension to the current CAZ zone, which is not required for compliance with the air quality limits. It would also require a large amount of additional infrastructure to be installed which is likely to lead to implementation of the zone being delayed.</p> <p>Eldon Place is also indirect and does not provide an alternative route to traffic potentially diverted by the CAZ.</p>
<p>Respondents asked for London Road to be included as it is currently highly polluted. Respondents were concerned vehicles may take diversions off the London Road that are down inappropriate roads or look to U-turn on London Road after following sat navs.</p>	<p>Most of the traffic passing along London Road continues through or comes from the Cleveland Place junction which is within the CAZ boundary. As such, the effect of improved vehicle compliance on air quality will be felt indirectly along the remainder of the London Road without including it within the zone. Including more of London Road would entail a need to include residential streets adjacent to it, particularly those with sole access to the A4, or create a need for multiple cordon points on streets adjoining London Road to the north, for example Snow Hill and St Saviours Road. Turn-back opportunities from what in some cases are roads with a steep gradient would be difficult.</p>
Lansdown	
<p>Concern about the exclusion of Cavendish Road and Julian Road as these roads are already excessively used as rat runs.</p>	<p>Cavendish Road and Julian Road are currently within the CAZ.</p>
<p>Respondents asked for Lansdown Crescent to be included to avoid people from rat running along it.</p>	<p>One end of Lansdown Crescent (the junction with Lansdown Road) is within the CAZ, therefore there are no destinations for people to rat run to and from along Lansdown Crescent.</p>
<p>Richmond Road and Richmond Place should be included as they are already very busy during school pick up and drop off times.</p>	<p>There is a small risk of some additional traffic using Richmond Road and Richmond Place as a route between London Road and Lansdown Road. However, this route is indirect and uses small and tight roads and is therefore, unlikely to be used as a route by non-compliant vehicles.</p>
Moorlands	
<p>Bloomfield Grove, Bloomfield Park and Moorlands School should be included to protect the school and children who walk and cycle to it.</p>	<p>The inclusion of Bloomfield Grove, Bloomfield Park and Moorlands School would require the need for multiple additional cordon points on residential streets with difficult turn-back points.</p>
<p>Respondents requested the inclusion of Bloomfield Road to stop non-compliant vehicles rat running down it, respondents also</p>	<p>There is a small risk of some additional traffic using Bloomfield Road as a route between A367 Wellsway, Englishcombe Lane</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
<p>asked for traffic on Bloomfield Road to be monitored. Respondents felt including Bloomfield Road would help to protect schools in the area.</p>	<p>and Frome Road. However, these routes converge outside of the zone at Bear Flat and Odd Down. As such, any additional usage would be limited to a few drivers trying to route east-west around this edge of the zone.</p>
<p>Concern Cotswold Road will be used as a cut-through, traffic on Cotswold Road should be monitored.</p> <p>Respondents asked for Hensley Road and Egerton Road to be included or else they could become a rat run, as it was the next available route now the Oldfield Road is included. Respondents were concerned that heavy polluting vehicles would use Hensley Road and Egerton Road and traffic should be monitored.</p> <p>Concern Monksdale Road will be used as a cut-through, traffic on Monksdale Road should be monitored.</p>	<p>There is a small risk of some additional traffic using Cotswold Road, Egerton Road, Hensley Road and Monksdale Road as a route between A367 Wellsway and A36 Lower Bristol Road. However, there are several alternative routes available for this journey, on larger and more appropriate roads. As such, any additional usage would be limited to a few drivers trying to route east-west around this edge of the zone.</p>
<p>Respondents asked for Englishcombe Lane to be included as it is already highly polluted and to avoid it becoming a rat-run for avoiding the zone.</p>	<p>There is a small risk of some additional traffic using Englishcombe Lane as a route between A367 Wellsway and A36 Lower Bristol Road and Whiteway Road. However, these route to Whiteway Road is already entirely outside the zone and there are several alternative routes available to A36 Lower Bristol Road. As such, any additional usage would be limited to a few drivers trying to route east-west around the zone.</p>
Newbridge	
<p>Concern that the general access to the Royal United Hospital off Combe Park, will become a rat run for non-compliant taxis.</p>	<p>There is a small risk of some additional traffic using Combe Park as a route between Weston Road and Upper Bristol Road. However, there are several other alternative routes that make this journey possible. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone. The Council is working to support taxis and ensure they are compliant.</p>
<p>Newbridge Road should be included as residents will be affected by an increase in polluting traffic.</p>	<p>Newbridge Road may be used as a route between A36 Lower Bristol Road and Upper Bristol Road. However, this route is not close to the edge of the CAZ, therefore there is unlikely to be an impact felt here.</p>
<p>RUH should be included as a hospital should not be subject to polluted air.</p>	<p>Including RUH would require inclusion of multiple residential streets and the need to create multiple cordon points on streets along the route. The air quality outside of RUH is already well within compliance limits.</p>
Odd Down	
<p>Respondents requested the inclusion of Rush Hill as non-compliant vehicles will divert via this route. Respondents noted Rush Hill was currently overloaded and this would get worse.</p>	<p>There is a small risk of some additional traffic using Frome Road, Rush Hill, Whiteway Road, Pennyquick Hill and Midford Road as an alternative route to the A36 through Bath. However, assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, and the congested nature of this route is expected to be a significant deterrent.</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
Oldfield Park	
Respondents asked for Brougham Hayes to be included to stop lorries and other vehicles from rat running via this area which is heavily populated.	The end of Brougham Hayes, joining the A36, is already included in the CAZ, therefore non-compliant vehicles are not likely to divert to any locations using this road.
Respondents thought Junction Road should be included as it is already busy with traffic, parked cars, pedestrians and cyclists and pollution was already a health hazard.	Junction Road connects Brougham Hayes via Lower Oldfield Park and Oldfield Road. As the ends of Brougham Hayes and Oldfield Park are both within the zone, non-compliant vehicles are not likely to divert to any locations using this road.
Lorne Road should be included to stop it being used as a cut-through around the Lower Bristol Road and Brougham Hayes Junction.	Lorne Road is not a through road between Lower Bristol Road and Brougham Hayes.
Respondents requested Oldfield Park should be included as it is heavily used by drivers and particularly LGVs, the residents there deserve clean air too.	Oldfield Park was identified by respondents as an area that may be particularly at risk of increased traffic and parking as a result of the CAZ. There were various calls to include this area within the zone. Doing so could, however, conceivably involve the inclusion of a very large residential area. If the zone boundary was to be aligned with the 'Linear Park' or 'Two Tunnels Greenway' route, it could simply displace non-compliant vehicle routing into the area to the south. An amendment here is not proposed for this reason. However, this area will be closely monitored. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.
Concern that Oldfield Road is already used for commuter parking in a highly populated area and conditions could become worse due to the CAZ.	Oldfield Road is already inside the CAZ. Parking will be monitored going forward. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.
Saltford	
Concern Pennyquick Hill will become heavily used by non-compliant vehicles, it is already busy, steep and narrow and is not appropriate for additional traffic.	There is a small risk of some additional traffic using Frome Road, Rush Hill, Whiteway Road, Pennyquick Hill and Midford Road as an alternative route to the A36 through Bath. However, assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe, and the congested nature of this route is expected to be a significant deterrent.
Concern about the re-routing of traffic through Saltford and request monitoring to ensure any impacts are identified and addressed.	Assessment of the traffic modelling results shows that the diversionary impacts expected are not high or severe through Saltford.
Southdown	
Concern Coronation Avenue will suffer increased air pollution due to additional HGVs and high emissions vehicles. Coronation Avenue has two schools on it and is extra busy during drop off and pick up times.	There is a small risk of some additional traffic using Coronation Road as a route between A367 Wellsway and A36 Lower Bristol Road. However, there are several alternative routes available for this journey, on larger and more appropriate roads. As such, any

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
	additional usage would be limited to a few drivers trying to route east-west around this edge of the zone.
Twerton	
<p>East Twerton should be included as it is a highly populated area where commuters park.</p> <p>Twerton should be included as there are numerous schools in the area and they should not feel diversionary effects.</p>	Twerton to the west is too remote from the western edge of the proposed CAZ to be sensibly linked.
Walcot	
<p>Respondents asked for Belgrave Crescent and Camden Road to be included as these roads currently create a potential escape 'roundabout' outside the zone. Respondents expressed that Belgrave Crescent is curved and narrow and is inappropriate for large vehicles to turn in. Respondents notes Camden Road is already a busy route into the city and had no capacity for increased traffic.</p> <p>Respondents asked for Eastbourne Avenue to be included as it doesn't become a rat-run around the zone with increased pollution.</p>	<p>As stated in FBC-25b OBC Consultation Response Report in Appendix Q of the FBC, including a wider length of Camden Road would inevitably require a need to include secondary roads served off of it to keep the number of necessary cordon points required on minor roads to a sensible level.</p> <p>Instead the perceived issue with turning around on Belgrave Crescent should be mitigated by the proposed advanced signage.</p>
<p>Camden, Walcot should be included as roads are steep and narrow and inappropriate for commercial vehicles to divert down.</p> <p>Concern Bennet Lane, Gays Hill, Snow Hill, Upper East Hayes will be used as a diversion which would be an issue as it is very steep and narrow.</p>	<p>Including Camden and Walcot within the zone would require and significant extension to the current zone which is not required for compliance with air quality limits. It would also require a large amount of additional infrastructure which is likely to lead to implementation of the zone being delayed.</p> <p>There is a small risk of some additional traffic using Bennet Lane, Gays Hill, Snow Hill and Upper East Hayes as a route between London Road and Lansdown Road. However, these roads are indirect and are very steep and narrow which is seen as a significant deterrent.</p>
Westmoreland	
<p>Westmoreland should be included as it is a highly populated area which is busy with commuter parking.</p> <p>Concern Bellotts Road, Millmead Road, Lyndhurst Road, West Avenue and Ringwood Road will become a diversionary route for non-compliant traffic, these roads are already very busy.</p> <p>Concern Brook Road will be used as a diversionary route for larger vehicles which would be inappropriate due to the narrow size and a weight restriction on the railway bridge.</p>	<p>There is a small risk of some additional traffic using Westmoreland, Bellotts Road, Millmead Road, Lyndhurst Road, West Avenue, Ringwood Road and Brook Road as a route between A367 Wellsway and A36 Lower Bristol Road. However, there are several alternative routes available for this journey, on larger and more appropriate roads. As such, any additional usage would be limited to a few drivers trying to route east-west around this edge of the zone.</p>
<p>More of the Lower Bristol Road should be included due to the current high levels of pollution.</p>	<p>Proposed advance signing at the A36/Windsor Bridge Road junction will be used to direct non-compliant vehicles away from the section of the A36 Lower Bristol Road between Windsor Bridge Road and Brougham Hayes. Including this section would</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
	<p>impact businesses along the north side for no reason, and there will already be an indirect air quality benefit from the A36/Brougham Hayes junction included within the CAZ. In other words, there is no eastbound 'through' traffic route available other than via the A36/Brougham Hayes junction once drivers exit the Windsor Bridge Road junction. In addition, other consultees were keen to see the A36 excluded from the zone, or as little included as possible.</p>
<p>Respondents requested for Windsor Bridge to be included as it is already very congested and will become busier with highly polluting vehicles.</p>	<p>Proposed advance signing at the A36/Windsor Bridge Road junction will be used to direct non-compliant vehicles away from the section of the A36 Lower Bristol Road between Windsor Bridge Road and Brougham Hayes. Including this section would impact businesses along the north side for no reason, and there will already be an indirect air quality benefit from the A36/Brougham Hayes junction included within the CAZ. In other words, there is no eastbound 'through' traffic route available other than via the A36/Brougham Hayes junction once drivers exit the Windsor Bridge Road junction. In addition, other consultees were keen to see the A36 excluded from the zone, or as little included as possible.</p>
Weston	
<p>Respondents requested Lansdown Lane to be included in the zone as it is very steep and currently has an unenforced height limit. Respondents expressed Lansdown Lane was not an appropriate diversionary route for large vehicles.</p> <p>Weston should be included in the zone, so it doesn't become a rat run.</p>	<p>Lansdown Lane through Weston to the west is too remote from the western edge of the proposed CAZ to be sensibly linked.</p>
Widcombe & Lyncombe	
<p>Respondents requested the inclusion of Church Street as it is a narrow road already used as a rat run. Respondents felt rat run issues on Church Street would only get worse as a result of the CAZ, increasing traffic and air pollution for residents.</p>	<p>There is a small risk of some additional traffic using Sydney Buildings, Horseshoe Walk and The Tynning as a route between Bathwick Hill and Widcombe Hill. However, these two routes converge and meet to the east at Combe Down. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone. Church Street, which would form the logical extension of this rat-run to Prior Park Road, is narrow, so would act as a significant deterrent.</p> <p>An amendment here is not proposed for this reason. However, this area will be closely monitored. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
<p>Entry Hill should be included as it is a rat run already.</p>	<p>Entry Hill is unlikely to see additional traffic as it is completely outside the zone and runs adjacent to the A367. Vehicles are</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
<p>Bear Flat should be included as it is already a polluted area and to avoid it being used as a rat run.</p> <p>Forefield Rise should be included so it is not used as a short cut for non-compliant vehicles.</p> <p>Respondents asked for Greenway Lane to be included as it is used as a rat run and air pollution along it is already high. Respondents were concerned that these issues on Greenway Lane could get worse, particularly due to large vehicles. Respondents also felt this might affect safety on Greenway Lane of pedestrians and children due to the narrow nature of it.</p> <p>Rosemount Lane should be included is a steep, single track road that is not appropriate to be used as a rat run by HGVs and LGVs.</p> <p>Lyncombe Vale should be included to stop it becoming a rat run for taxis and LGVs especially as the road is used by a number of small children to get to school.</p>	<p>unlikely to divert their route via Entry Hill as there are more appropriate or direct alternatives.</p> <p>There is a small risk of some additional traffic using Forefield Rise, Greenway Lane, Rosemount Lane and Lyncombe Vale as a route between Prior Park Road and A367 Wellsway. However, these routes have a more direct road between then, A3062. As such, any additional usage would be limited to a few drivers trying to route east-west around this edge of the zone.</p> <p>Lyncombe Vale also leads to Lyncombe Vale Road and a dead end; therefore, non-compliant vehicles are not likely to divert to any locations using this road.</p>
<p>Holloway should be included, or it will become a drop-off point for the bus/railway station.</p>	<p>As the zone no longer charges private cars it is not expected that a significant number of additional journeys will be made in non-compliant vehicles to drop people off for the bus/railway station.</p>
<p>Respondents asked for Horseshoe Walk and The Tynning should be included as it will form part of a rat run to avoid the zone. Respondents felt Horseshoe Walk and The Tynning should be included in the zone in order to align it to Residents' Parking Zone 2.</p>	<p>There is a small risk of some additional traffic using Sydney Buildings, Horseshoe Walk and The Tynning as a route between Bathwick Hill and Widcombe Hill. However, these two routes converge and meet to the east at Combe Down. As such, any additional usage would be limited to a few drivers trying to route north-south around this edge of the zone. Church Street, which would form the logical extension of this rat-run to Prior Park Road, is narrow, so would act as a significant deterrent.</p> <p>An amendment here is not proposed for this reason. However, this area will be closely monitored. Proposals for monitoring in this area are set out in document FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
<p>Respondents requested Lyncombe Hill to be included as it is a narrow road and additional vehicles rat running down it would be a safety issue.</p> <p>St. Mark's Road should be included because of its proximity to the centre.</p>	<p>The present inclusion of the White Hart junction will intercept and control non-compliant vehicle usage on Widcombe Hill and Prior Park Road. The proposed cordon point on Lyncombe Hill is sited at the A36 junction to allow some opportunity for non-compliant vehicles to turn-back using either St Marks Road or Calton Gardens. Whilst it is possible these streets might also be used by non-compliant drivers to drop-off/pick-up, re-siting the cordon point, say, north of Alexandra Road, would create no avoidance</p>

Comment / issue / question raised – requesting inclusion of areas within the zone	Response/ how addressed
Concern Widcombe Hill could become a cut-through for non-compliant vehicles.	'turning' opportunity for drivers using Lyncombe Hill (unless sited much further south and just north of the Rosemount Lane junction). If the latter was considered, the southern extension of the zone along Lyncombe Hill would encompass a number of other streets, whilst the position of the cordon point in Prior Park Road would have to be re-evaluated (so likely just north of the Lyncombe Vale junction (Rosemount Lane)).
Wells Way (A367) should be included.	A significant extension to the zone in this direction would not be required for compliance and would disadvantage several businesses along the Wellsway. Extending the zone boundary, for example to Hatfield Road, would provide no opportunity for inbound A367 non-compliant traffic reaching the dual carriageway section to turn-back.
Widcombe should be included as it is one of the most polluted parts of Bath.	Including Widcombe would impact several residents and businesses along the south east of the zone for no reason, which will get an indirect air quality benefit anyway with the A36 included within the CAZ.
Wiltshire	
Concern about the traffic displacement in the surrounding local roads and villages due to the CAZ. Respondents were concerned about traffic diverting down through Bradford on Avon and Winsley along the B3108 as a result of the A36 being included. Respondents felt numbers heavy polluting vehicle numbers would increase causing more bottlenecks, increased traffic and decrease air pollution for residents.	<p>As stated in FBC-25b OBC Consultation Response Report Appendix Q of the FBC, the forecast impact of the Class D CAZ on roads to the east of Bath is expected to be neutral overall, with individual changes in traffic volumes resulting in, at most, 1% reductions or increases in daily volume, with this impacted expected to be lower still with a Class C CAZ.</p> <p>Subject to receipt of government funding and practical requirements, additional monitoring is under consideration in Wiltshire. Analysis of data collected in Wiltshire can then be used within the ongoing assessment of the scheme performance and inform appropriate refinements should they be deemed necessary.</p>

5.2.6 Comments requesting the exclusion of specific streets / areas from the zone

Comments reported here are a combination of those from respondents either requesting the exclusion of specific streets/areas from the zone or concern about specific streets/areas being included in the zone. These comments were categorised firstly by their electoral ward in B&NES, as can be seen in Figure 5-2, and then by the street / area mentioned by the respondent. Overall more comments requested the inclusion of additional streets in the zone than requested for streets or areas to be removed from the zone.

Further detail on the exclusion of specific streets/areas from the zone, broken down by electoral ward is provided in Table 5-4 below.

Table 5-4: Comments requesting the exclusion of specific streets / areas from the zone

Comment / issue / question raised – requesting exclusion of areas from the zone	Response/ how addressed
Bathwick	
The inclusion of Bathwick offers no way through to the A36 for commercial vehicles, and they are unable to use other routes.	As stated in FBC-25b OBC Consultation Response Report Appendix Q of the FBC, a sensitivity test was conducted which showed that the removal of the Cleveland Bridge / A36 and A4 link from the zone resulted in a maximum concentration of 40.8 µg/m3 of NO ₂ , above the legal air quality limit.
Unsure why Bathwick Estate has been included as it is a no-through route.	Bathwick Estate is accessed from Beckford Road which is inside the zone and, therefore, as you cannot get to Bathwick Estate without entering the zone, it should be inside the boundary.
Kingsmead	
There is still no way of getting to the recycling centre .	The recycling centre is outside of the zone, therefore access without going through the zone is possible.
Sainsbury's shouldn't be included within zone.	Removing Pines Way gyratory and moving cordon points to Midland Bridge Road and the A36 Lower Bristol Road to the east of the gyratory would by default remove the A36/Brougham Hayes junction from the CAZ. This would create a potential avoidance route via the B3111.
In order to provide options to travel by alternative means, access to the bus and train stations should be allowed without charge.	Private cars are not charged under a Class C CAZ and therefore can travel without charge to the bus and train station. It is also possible to use local buses and taxis to access the bus and train stations.
Lansdown	
Concern that Great Bedford Street, St James' Park, Cavendish Road etc. are included in the zone where air is currently clean. There was concern from van drivers about having to pay £9 every time they travel and leave the zone.	Removing these streets from the zone would require the Weston Road cordon point to be relocated to a point closer to the Cavendish Road junction, and Marlborough Lane to the south of the Royal Avenue junction to be removed. Removal of Cavendish Road, and also the Weston Road/Cavendish Road junction, would open-up a significant opportunity for avoidance routing between Weston Road and Lansdown Road via Cavendish Road, Winifred's Lane (northbound only) and Sion Road.
Concern that Lansdown Grove and St Stephen's Road were included in the zone, when roads closer to the city such as Lansdown Crescent were exempt.	Following an initial assessment and ongoing discussion with key stakeholders within the Council, a northwards extension of the boundary to St. Stephen's Church (Lansdown Road/Richmond Road junction) was incorporated into the CAZ at a previous stage in the project. It was considered that its inclusion was necessary to prevent traffic routing around the zone boundary to avoid the charge, so increasing non-residential traffic whilst reducing air quality on local streets.
Oldfield Park	
Respondents felt it was unfair to charge people turning up Brougham Hayes , a very short distance in the zone, in order to avoid the city centre and doing so would cause rat runs	The inclusion of the A36/Brougham Hayes junction is primarily focussed on preventing the undesirable re-routing of non-compliant vehicle trips around the edge of the zone in both directions via the

Comment / issue / question raised – requesting exclusion of areas from the zone	Response/ how addressed
through inappropriate local roads. Including Brougham Hayes would also have a large effect on people coming from West Wiltshire and south B&NES coming into Bath on the A367. Concern about the inclusion of Oldfield Park , which would limit the options of people travelling into the city from the south.	B3111 (so Brougham Hayes, Lower Oldfield Road, Junction Road and Oldfield Road) which might otherwise result in worse air quality in this area and/or undesirable congestion issues.
A respondent felt the Pines Way Roundabout should be excluded so it could be used as a sensible turn around point for vehicles looking to avoid the zone.	Removing Pines Way gyratory and moving cordon points to Midland Bridge Road and the A36 Lower Bristol Road to the east of the gyratory would by default remove the A36/Brougham Hayes junction from the CAZ. This would create a potential avoidance route via the B3111.
Walcot	
Respondents expressed concern at the inclusion of the Cleveland Bridge / A36 and A4 link . Respondents felt this could cause high emission commercial vehicles to divert to inappropriate routes through Bathampton and Wiltshire.	As stated in FBC-25b 'OBC Consultation Response Report' Appendix Q of the FBC a sensitivity test was conducted which showed that the removal of the Cleveland Bridge / A36 and A4 link from the zone resulted in a maximum concentration of 40.8 µg/m ³ of NO ₂ , above the legal air quality limit.
Concern people would not be able to leave the city to travel to Chippenham from Ringswell Gardens due to the inclusion of London Road	Ringswell Gardens, and its junction with the London Road, is outside of the CAZ.
Other	
Respondents felt that the A36 should be excluded to allow through traffic. Respondents expressed concern that this would cause highly polluting vehicles to divert through Bradford on Avon and Rush Hill, which are not appropriate for such traffic. Concern over the inclusion of the A36 as it is a primary route, which vehicles use to travel to locations other than Bath.	As stated in FBC-25b OBC Consultation Response Report in Appendix Q of the FBC, a sensitivity test was conducted which showed that the removal of the A36 and A4 from the zone, resulted in a maximum concentration of 47.0 µg/m ³ of NO ₂ , above the legal air quality limit.
A respondent expressed concern that the nearest petrol stations to them would only be available in Saltford and Odd Down.	The petrol station on London Road is also located outside of the zone.

5.2.7 Comments expressing other concerns about the boundary

Respondents comments here included:

- Through trips to be allowed across the zone boundary:
 - There has to be a free route through Bath, traffic coming from A4 London Road should be able to travel to the A36 Warminster Road and Lower Bristol Road and Upper Bristol Road. Any other detour would result in long detours and extra emissions; and
 - There is no practical way to travel from Larkhall to Bear Flat without going through the CAZ, any diversion will result in much longer journeys and more pollution.
- Respondents felt the current boundary was complicated and would:
 - Make it difficult to keep track of which vehicles are moving through the zone day to day; and
 - Result in vehicles passing through the zone multiple times in one day.

DRAFT

6. Feedback on the Queen Square proposals with associated changes in traffic flows

6.1 Context

Question 3 asked respondents to provide their comments on the Queen Square proposals and the associated changes in traffic flows.

The Queen Square proposals are an important part of the proposed Class C CAZ. Without this measure a Class C CAZ would not be capable of reducing NO₂ to within legal limits in the timescale required.

New traffic lights will be placed at the junctions with the A367 Chapel Row/Princes Street and at Queen Square Place to moderate the flow of traffic into Gay Street. The new traffic lights will be a temporary measure which will be removed once compliance with air quality targets is reached. The Council will also seek to improve the space with better footways, priority for cyclists and traffic light crossings.

As a knock-on effect of the new traffic lights, it is predicted that some vehicles will divert along Julian Road, Marlborough Buildings and Cavendish Road, and that this will create a small increase in NO₂ levels at Whiteway Road, Rush Hill and Lansdown Lane. However, levels of NO₂ are not expected to exceed the legal threshold at these locations or in any other area of Bath.

6.2 Overview of responses

Of the 597 questionnaires submitted, 247 included comments on question 3, regarding Queen Square proposals. Where letters and emails included comments on this topic these are also included below.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Overall, opinions on the **Queen Square traffic management proposals** were mixed. Some respondents suggested that this was a step in the right direction, however some felt that the measures could go further, for example that the Square should be pedestrianised completely or the measures should be a permanent feature. Others expressed concern that the proposed measures would increase congestion within the area and result in more traffic using neighbouring residential streets and therefore increase emissions in these areas.

Certain residents' associations, as well as several local businesses responded directly via letter or email on the Queen Square proposals. In particular, those residents' associations who would be or perceive they would be directly impacted by the associated traffic flow changes resulting from the proposals. These included: Cavendish Road Society, St James Square, Cavendish Road, Cavendish Crescent, Lansdown Crescent and St James's Square Bath Limited. Local businesses who responded on the proposals outlined concerns that the measures would negatively impact congestion and that the current issue is a result of parked cars and pedestrian crossings causing delay.

6.2.1 Comments expressing support for the proposals at Queen Square

Respondents provided general comments in support of the proposals at Queen Square considering the scheme necessary. For example, respondents supported a reduction in air pollution in Queen Square and acknowledged that improvements in air quality will improve conditions for those with asthma. Respondents supported reducing high vehicle speeds and therefore dangerous traffic in Queen Square. There was also support for a reduction in the volume of traffic in Queen Square, specifically as it is an historic centre.

Respondents suggested that the Queen Square proposal could deliver additional benefits to various groups, particularly pedestrians and cyclists. Respondents thought that the proposal could encourage more people to walk through enhancing pedestrian access to the square and making crossing easier and safer, especially in the south west corner. It was noted that currently access to the west side of Queen Square is difficult and dangerous for pedestrians and cyclists and it is hoped that this will improve conditions. Other respondents suggested that by improving air quality and reducing pollution, the proposals would encourage the use of Queen Square for leisure and recreation. Some respondents also suggested the proposals would be improved through making them permanent.

6.2.2 Comments expressing concern or reservations about the proposals at Queen Square

Respondents provided comments expressing concerns or reservations about the Queen Square proposals. Further detail on the comments expressing concerns or reservations about the proposals and responses to these, are provided in Table 6-1.

Table 6-1: Responses to comments expressing concerns or reservations about the Queen Square proposals

Comment / issue / question raised	Response/ how addressed
General concerns	
The Queen Square proposals are a “stop gap” measure.	The Queen Square proposals are required for compliance with legal limits of NO ₂ to be reached in the shortest possible time and by 2021 at the latest.
The Queen Square proposals are doing just enough to be minimally compliant.	The Queen Square proposals enable compliance to be reached in the shortest possible time or by 2021 at the latest. In addition, the Council intends to look more generally at possible wider public realm improvements at Queen Square in the near future, and aims to limit access to the historic city centre to permitted vehicles during permitted times
How long will it take for compliance to be achieved?	The Queen Square proposals are required for compliance with legal limits of NO ₂ to be reached in the shortest possible time and by 2021 at the latest. The infrastructure will be implemented in 2020 in advance of CAZ commencement.
The proposals are confusing? Why are they necessary? / Queen Square is fine as it is / Are traffic lights necessary?	The Queen Square proposals are necessary to reduce an exceedance on Gay Street, which remains with a Class C CAZ, to within legal limits in the shortest possible time or by 2021 at the latest.
Concern that the Queen Square will become cluttered with additional traffic lights and signs, even if justified as temporary.	The scheme will be designed to be sympathetic to the historic nature of Queen Square and to minimise signage/clutter where possible.
Concern the CAZ could face a legal challenge if signage in Queen Square is inadequate (like Dorchester Street where the traffic ban was overturned).	The proposals for Queen Square do not include a traffic ban or similar restriction on routing or type of vehicle. The required signage will be provided in accordance with national guidance.
Concerns about the impact of the Queen Square proposal on air quality	
Concern that the proposed traffic signals at Queen Square would not help or that air quality could worsen because they would increase idling traffic.	The Queen Square proposals are necessary to reduce an exceedance on Gay Street, which remains with a Class C CAZ, to within legal limits in the shortest possible time or by 2021 at the latest. Modelling of the proposal has been undertaken with due consideration to resulting queue lengths, and air pollution will not be increased to above legal limits at any location in Bath as a result of these

Comment / issue / question raised	Response/ how addressed
	proposals. Air pollution will decrease across the city, making Bath a more attractive place to live, work and visit. Funding for anti-idling enforcement is requested from central government to tackling idling vehicles within Bath.
The Queen Square proposal will negatively impact the health of pedestrians, cyclists and families and those at schools and hospitals on nearby routes.	The Queen Square proposals are necessary to reduce an exceedance on Gay Street, which remains with a Class C CAZ, to within legal limits in the shortest possible time or by 2021 at the latest. Air pollution will not be increased to above legal limits at any location in Bath as a result of these proposals. Air pollution will decrease across the city, making Bath a more attractive place to live, work and visit.
<p>Concern that the proposals will worsen air quality in surrounding areas, namely:</p> <ul style="list-style-type: none"> • The city centre; • Whiteway Road; • Rush Hill; • Brassknocker Hill; • Chapel Row; • Charlottes Street; and • Claverton Down. <p>These locations include some of the most deprived areas in Bath and any increase in air pollution, even if pollution is not above legal limits, is not acceptable for it to increase.</p> <ul style="list-style-type: none"> • Concern the proposals will worsen the air quality on the named roads in the proposal, Cavendish Place, Marlborough Buildings and Julian Road. Particularly Julian Road, as a location for St Andrew's C of E School. • Concern that the proposals spread emissions rather than lowering them. • Concern that the proposals increase air pollution in residential areas, for the betterment of air quality in the centre (which benefits businesses). • Concern that during construction, the air quality will worsen. 	<p>The proposed traffic management at Queen Square is designed to deter traffic from using this route in order to bring a remaining air quality exceedance at Gay Street to within legal limits. Technical assessment indicates that there will be some diversionary impacts on alternative routes, however these will not cause air quality exceedances in these locations. Overall NO₂ concentrations are predicted to remain unchanged or fall in response to the CAZ, with the exception of Whiteway Road and Rush Hill where NO₂ concentrations are predicted to marginally increase, but not above legal limits. Those locations predicted to experience an increase in traffic will be carefully monitored for adverse impacts to ensure continued safety and functionality of these routes.</p> <p>The traffic management measures will be subject to careful monitoring and operation in order to minimise any adverse impacts. Details of the proposing operation procedures are included in FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
Concerns about the impact of the Queen Square proposal on traffic conditions	
<p>Concern about the impact of the Queen Square proposal. Comments included:</p> <p>Nearby roads which are narrow, residential and already congested, concern for increased traffic specifically HGVs using these roads. Particular concern over increased traffic through inappropriate junctions.</p> <p>Additional traffic on residential and school streets is not fair for the residents and school children who will suffer due to the increased traffic (severance and safety), noise and air pollution.</p>	<p>The proposed traffic management at Queen Square is designed to deter traffic from using this route in order to bring a remaining air quality exceedance at Gay Street to within legal limits. Technical assessment indicates that there will be some diversionary impacts on alternative routes, however these will not cause air quality exceedances in these locations. Overall NO₂ concentrations are predicted to remain unchanged or fall in response to the CAZ, with the exception of Whiteway Road and Rush Hill where NO₂ concentrations are predicted to marginally increase, but not above legal limits. Those</p>

Comment / issue / question raised	Response/ how addressed
<p>It is noted that many school children walk along Lansdown Lane and Julian Road and increased traffic would be a risk to St Andrews school and Guinea Lane Nursery.</p> <p>Concern that the proposals will increase congestion due to additional traffic signals at Queen Square. As a result, traffic will move elsewhere. Comments included:</p> <ul style="list-style-type: none"> • It will redirect traffic via Georgian terrace streets not equipped for additional traffic or weight. • Increased traffic along routes as a result of displaced traffic from Queen Square proposals will affect schools and school walking zones. • Increased traffic on currently low traffic, safe cycling routes (i.e. Royal Avenue) and on a key east/west cycling route (Julian Road). • The traffic signals will cause significant hindrance to those travelling through the city, particularly trying to avoid the bus gate. • Rat running of traffic will increase traffic on bus routes making buses unreliable. • The timing of additional signals will just add to the congestion problems particularly sequencing and linking with other signals in the area. • Concern that the proposal will increase traffic on: <ul style="list-style-type: none"> - Whiteway Road; - Rush Hill; - Lansdown Lane; - Julian Road, near St Andrews School; - Cavendish Road; - Marlborough Lane; - Marlborough Buildings; - Cavendish Road - Bathwick Street; - Park Lane; and - Guinea Lane. 	<p>locations predicted to experience an increase in traffic will be carefully monitored for adverse impacts to ensure continued safety and functionality of these routes.</p> <p>As part of the scheme implementation, the traffic signals in the area will be harmonised to ensure efficient running and monitored using the central system which covers all traffic signals in Bath.</p> <p>The traffic management measures will be subject to careful monitoring and operation in order to minimise any adverse impacts. Details of the proposing operation procedures are included in FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>
<p>Comments doubting the effectiveness of Queen Square proposals:</p> <p>The proposals will change peoples' driving habits, i.e. the routes they take, not their choice of mode. Therefore, traffic will be redistributed not reduced.</p> <p>Installing new lights will not solve the problem, it does not solve the lack of cohesion between lights at Queen Square and those on George Street, which causes the traffic.</p>	<p>Traffic and air quality modelling have demonstrated that the proposed measures will have the required impact in reducing the remaining air quality exceedance to within legal limit in the shortest possible time. This will be verified by continued air quality monitoring and subject to corrective action should there be an issue. As part of the scheme implementation, the traffic signals in the area will be harmonised to ensure efficient running and monitored using the central system which covers all traffic signals in Bath.</p>

Comment / issue / question raised	Response/ how addressed
Concerns about the cost of the Queen Square proposal	
The works to implement the proposal will be costly, to install and maintain.	Costs can be found in FBC-21 Project Costs in Appendix I of the FBC.
Concerns about the Queen Square proposal being temporary and its removal	
Why is the Queen Square proposal temporary? The proposals should be permanent, does not go far enough as a temporary measure	The Queen Square scheme is put forward as a temporary measure because as vehicles generally move towards less polluting types it may not be necessary to manage traffic here permanently in order to address the air quality hot spot on Gay Street. The Council intends to monitor this situation and will review as required. In addition, the Council intends to look more generally at wider public realm improvements in Queen Square. Any decision to change or remove the measures at Queen Square would be based on analysis of traffic flow and air quality changes.
When the traffic lights are removed, will the number of vehicles increase again and air quality decrease?	
How will the removal of the scheme be decided? How will it be known when air pollution has decreased?	

6.2.3 Comments suggested alterations or alternatives to the Queen Square scheme

Respondents provided suggestions for changes to the Queen Square proposal and suggested alternative proposals at Queen Square. Suggestions included:

- Pedestrianising Queen Square or banning traffic instead;
- Making the scheme permanent instead of temporary;
- Introducing measures at Queens Square to encourage walking and cycling;
- Suggestions to reduce traffic / improve traffic flow at Queen Square; and
- Monitoring locations and requests for locations around Queen Square.

Further detail on the suggested changes and alternatives at Queen Square as well as responses to the suggestions are provided in Table 6-2.

Table 6-2: Responses to comments suggesting alterations or alternatives on Queen Square proposals

Comment / issue / question raised	Response/ how addressed
Pedestrianise Queen Square or ban traffic instead	
Respondents felt that the Queen Square proposals do not go far enough and that it should be pedestrianised completely.	Queen Square is an important part of the network. Removing traffic from here would have a significant knock-on effect for other routes. Longer term the Council intends to look at what other improvements could be made to the public realm on Queen Square and how further improvements for pedestrians and cyclists could be made.
Make the scheme permanent instead of temporary	
<ul style="list-style-type: none"> • Rather than removing the scheme once compliance is achieved, the scheme should be reviewed for its effectiveness in improving air quality resident / tourism safety. • Make the measures permanent. 	The Queen Square scheme is put forward as a temporary measure because, as vehicles generally move towards less polluting types, it may not be necessary to manage traffic here permanently in order to address the air quality hot spot on Gay Street. The Council intends to monitor this situation and will review as required.

Comment / issue / question raised	Response/ how addressed
Introduce measures to encourage walking and cycling	
To encourage modal shift, include a segregated cycle lane similar to the one on London Road around Weymouth Street / Bedford Street and remove one lane of traffic.	The Queen Square traffic management as presented in this FBC enables compliance to be delivered in the shortest possible time. Further changes could be considered in the future but would be subject to further traffic flow and air quality analysis. The scheme includes a central cycle lane, which facilitates cyclists moving from Queen Square to Queens Parade. Low level cycle aspects will be included to give cyclists on the road visibility to signals in their optimum position. These would also give cyclists a few seconds 'early start' to depart the stop line before any traffic proceeds. The scheme also includes five new pedestrian crossings, pedestrian countdown timers, footway widening and a raised table at the south-west corner to improve the uncontrolled crossing.
Pedestrianise the eastern and southern side, closing it to traffic, with the northern and western sides available to buses only (and residents' access).	
Give priority to pedestrians in this area, over traffic.	
Extend the pedestrian crossing on the corner of Queen Square with Chapel Row and install a new crossing on Cavendish Road, for pedestrian safety to encourage more pedestrian use and discourage traffic.	
Deter cars loading/offloading at the lower right corner of Queen Square as it blocks the cycle thoroughfare.	
What are the changes to give cyclists priority? Will there be cyclist only traffic lights and segregated cycle lanes?	
Suggestions to reduce traffic / improve traffic flow	
Close the East and South side of Queen Square to reduce traffic and improve traffic flow, particularly for emergency services access to the RUH.	The Queen Square traffic management as presented in this FBC enables us to deliver compliance in the shortest possible time. Further changes could be considered in the future but would be subject to further traffic flow and air quality analysis.
Close the northern side and make the flow two-way.	
Suggestions to reconsider closing some sides of Queen Square to traffic.	
Charge private diesel vehicles or all polluting traffic to travel through Queen Square.	
Close the northern side for pedestrians and make the flows two-way for traffic, with remaining space.	
Implement speed restrictions (and enforcement through speed cameras/CCTV) along roads impacted by reassigned traffic from Queen Square proposals (i.e. Julian Road).	
Enforce anti-idling as the proposals will result in longer standing traffic.	
Ease traffic flows by removing or rephasing all traffic lights in the affected areas, as well as junction improvements. Impeding traffic causes idling and stop/start which increases air pollution.	
To reduce traffic in lower Gay Street, prohibit the right turn from upper Gay Street.	
The number of cars should be reduced, through incentives, instead of the Queen Square proposal.	

Comment / issue / question raised	Response/ how addressed
Comments on monitoring air quality	
What will be in place to monitor air quality and levels of NO ₂ around Queen Square, the surrounding streets and the rest of Bath?	For full details of the planned monitoring see FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.
Ensure residential streets and streets which are used to walk to schools are closely monitored.	Noted.

7. Feedback on support packages

7.1 Context

Question 4 and 5 asked respondents to provide their comments on the various support packages. The packages include various financial and practical support for local businesses and individuals affected by the charges along with measures. Question 4 asked about support packages for which funding has been secured and Question 5 asked about support packages subject to final confirmation of funding from central government.

Question 4 and 5 were asked in two parts: a tick box question allowing respondents to state whether the packages were applicable to them / their business and useful to those affected, followed by an open text box for any further comments on the packages. Both the quantitative analysis (of the tick boxes) and qualitative analysis (of the open text questions) are summarised below.

Further information on the funded support packages and feedback on these is summarised in section 7.3 whilst feedback on support packages for which funding is yet to be confirmed is summarised section 7.4.

7.2 Overview of responses

Of the 597 questionnaires submitted, 314 included comments on question 4 (funded support packages) and 260 included comments on question 5 (support packages with funding yet to be confirmed). Where letters and emails included comments on this topic these are also included below.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Overall opinions on the **support packages** were mixed. Respondents expressed support for those incentives or reinvestments that included requests for improvements to the public transport, walking or cycling experience (including tackling the school run), park and ride sites and increased provision of electric charging points. Respondents showed less support for initiatives associated with deliveries, particularly incentives for van drivers to use the park and ride sites.

Some of the letters and emails from local and national (UPS, RHA) businesses were positive about some of the measures, including the support for local businesses to upgrade non-compliant vehicles, but sought clarity how it would be administered and implemented. Several also mentioned last mile delivery and servicing support was applicable to them.

7.3 Feedback on support packages for which funding has already been secured

Question 4 asked respondents to comment on the support packages for which funding has already been secured. These included:

- financial support to upgrade older buses;
- financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles;
- travel advisors to work with residents and businesses;
- anti-idling enforcement to directly improve air quality; and
- weight restriction enforcement to stop inappropriate rat running.

Of the 597 questionnaires received, 314 responded to the tick-box question and / or the open text question, therefore expressing a view on the support packages.

7.3.1 Quantitative analysis

Of the 597 questionnaire respondents, 223 respondents (37%) indicated whether at least one of the funded measures were applicable to them and 276 respondents (46%) indicated whether at least one of the funded measures were useful to them. Table 7-1 shows the responses to the part of Question 4 which asked whether the support measures were applicable to the respondent / their business.

Table 7-1: Question 4: Funded support packages applicable to the respondent / their business

Funded Support Packages	Applicable to you / your business? (Percentages are based on the 223 respondents to this question)					
	Yes		No		Not Sure	
Financial support to upgrade older buses	57	26%	128	57%	5	2%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	57	26%	124	56%	12	5%
Travel advisors to work with residents and businesses	56	25%	102	46%	28	13%
Anti-idling enforcement to directly improve air quality	127	57%	57	26%	15	7%
Weight restriction enforcement to stop inappropriate rat running	120	54%	66	30%	14	6%

Of 223 respondents, the measures which most respondents identified as being applicable to them / their business were the anti-idling enforcement (57%) and weight restrictions (54%).

When split into individuals and businesses / organisations (using responses to Question 11), 90% of the 223 respondents to Question 4 were individuals, 9% were businesses / organisations and 1% did not state. Table 7-2 and Table 7-3 show the responses to the part of Question 4 which asked whether the support measures were applicable to them, split by individuals and businesses / organisations.

Of 200 individual respondents, the measures which most identified as being applicable to them / were the anti-idling enforcement (59%) and weight restrictions (55%). The measure most applicable to the business / organisation respondents was considered to be the financial support to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles with 65% of the 20 business / organisation respondents identifying this.

Table 7-2: Question 4: Funded support packages applicable to the individual respondents

Funded Support Packages	Applicable to you / your business (Individual respondents)? (Percentages are based on the 200 individual respondents)					
	Yes		No		Not Sure	
Financial support to upgrade older buses	51	26%	116	58%	3	2%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	44	22%	117	59%	11	6%
Travel advisors to work with residents and businesses	48	24%	91	46%	27	14%
Anti-idling enforcement to directly improve air quality	117	59%	47	24%	14	7%
Weight restriction enforcement to stop inappropriate rat running	110	55%	57	29%	13	7%

Table 7-3: Question 4: Funded support packages applicable to the business / organisation respondents

Funded Support Packages	Applicable to you / your business (Business / organisation respondents)? (Percentages are based on the 20 business / organisation respondents)					
	Yes		No		Not Sure	
Financial support to upgrade older buses	5	25%	10	50%	2	10%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	13	65%	5	25%	1	5%
Travel advisors to work with residents and businesses	8	40%	9	45%	1	5%
Anti-idling enforcement to directly improve air quality	10	50%	8	40%	1	5%
Weight restriction enforcement to stop inappropriate rat running	9	45%	8	40%	1	5%

Table 7-4 shows the responses to the part of Question 4 which asked whether the support measures were useful to those affected.

Table 7-4: Question 4: Funded support packages useful to those affected

Funded Support Packages	Useful to those affected? (Percentages are based on the 276 respondents to this question)					
	Yes		No		Not Sure	
Financial support to upgrade older buses;	205	74%	16	6%	21	8%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles;	188	68%	23	8%	26	9%
Travel advisors to work with residents and businesses;	127	46%	43	16%	57	21%
Anti-idling enforcement to directly improve air quality;	202	73%	23	8%	22	8%
Weight restriction enforcement to stop inappropriate rat running.	215	78%	21	8%	16	6%

Of 276 respondents, the measures which most respondents identified as being useful were the weight restrictions (78%), financial support to upgrade older buses (74%) and anti-idling enforcement (73%). Travel advisors were identified by 16% of respondents as not being useful to those affected.

When split into individuals and businesses / organisations (using responses to Question 11), 91% of the 276 respondents to Question 4 were individuals, 7% were businesses / organisations and 1% did not state. Table 7-5 and

Table 7-6 show the responses to the part of Question 4 which asked whether the support measures were useful to them, split by individuals and businesses / organisations.

Of 252 individual respondents, the measures which most identified as being useful to those affected were the weight restrictions (79%), anti-idling enforcement (74%) and financial support to upgrade older buses (74%). The measures considered most useful to those affected by the 20 business / organisation respondents were the financial support to upgrade vehicles (80%) and financial support to upgrade older buses (80%).

Table 7-5: Question 4: Funded support packages useful to the individual respondents

Funded Support Packages	Useful to those affected (Individual respondents)? (Percentages are based on the 252 individual respondents)					
	Yes		No		Not Sure	
Financial support to upgrade older buses	186	74%	14	6%	21	8%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	169	67%	20	8%	25	10%
Travel advisors to work with residents and businesses	115	46%	39	15%	55	22%
Anti-idling enforcement to directly improve air quality	187	74%	18	7%	21	8%
Weight restriction enforcement to stop inappropriate rat running	199	79%	18	7%	14	6%

Table 7-6: Question 4: Funded support packages useful to the business / organisation respondents

Funded Support Packages	Useful to those affected (Business / organisation respondents)? (Percentages are based on the 20 business / organisation respondents)					
	Yes		No		Not Sure	
Financial support to upgrade older buses	16	80%	1	5%	0	0%
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	16	80%	2	10%	1	5%
Travel advisors to work with residents and businesses	10	50%	3	15%	1	5%
Anti-idling enforcement to directly improve air quality	12	60%	4	20%	1	5%
Weight restriction enforcement to stop inappropriate rat running	13	65%	2	10%	2	10%

7.3.2 Qualitative analysis

Of the 597 questionnaires submitted, 141 (24%) respondents commented on Question 4, providing free-text responses.

Respondents provided comments on the support packages for which funding has been secured. Generally, respondents were supportive of the financial support scheme to support the upgrade of buses and local residents / businesses affected. There was concern about the support that would be provided, how it would be administered and if it would be sufficient to upgrade. Suggestions for the funding included that funding should only be available for vehicles to upgrade to electric. Comments on the anti-idling and weight restrictions were generally supportive although queries about the feasibility of the enforcement were raised.

Respondents also used this section to provide comments on other themes. For clarity of reporting, comments on other themes have been reported in chapters which better align with the comments: additional support packages (reported in section 7.4.7); alternative schemes (reported in section 11.2.2); comments on the consultation (reported in section 11.2.4); and other comments (reported in section 11.2.5).

7.3.3 Comments on financial support to upgrade older buses

Respondents provided comments on the support package to provide financial support to upgrade older buses. Under this proposal grants would be provided to local bus companies to retrofit or repower older, non-compliant buses. Generally, respondents were supportive about proposals to provide financial support to upgrade older buses as they felt this would prevent increases in ticket prices and / or the reduction in bus services, specifically rural services. Some respondents suggested that the scheme should only fund buses to upgrade to electric or greener modes whilst others thought the bus companies should be responsible for the cost of upgrading their fleets.

Further detail on the comments and responses to these, are provided in Table 7-7.

Table 7-7: Comments on financial support to upgrade older buses

Comment / issue / question raised	Response/ how addressed
Support for public transport is required to ensure that charges or the cost of upgrading is not passed onto the customer through increased ticket prices. Increased ticket prices would discourage people from using public transport and increase the use of the private car and therefore emissions. Increasing the cost of ticket prices to cover the cost of charges or vehicle upgrades would have a negative impact on already struggling, low income groups.	To ensure air quality improvements whilst protecting existing services and discouraging increases to ticket prices, the Council is working with local bus operators and using funding from central government to support retrofitting and upgrades of buses. As such, by the time the scheme is implemented buses are anticipated to be compliant and therefore not incur the charge.
Without support bus companies may withdraw services, so it is essential to ensure that the local public service bus companies are supported to continue to serve both the city and outlying areas.	
Bus companies should bear the cost of upgrading their vehicles.	
Can all buses be retrofitted? If older buses can't be, what will happen to these?	The Council is requesting funding for local bus companies to retrofit or repower older buses to ensure the fleet is compliant with the scheme's emissions standards.

Comment / issue / question raised	Response/ how addressed
Older buses, commercial vehicles that cannot be converted must be scrapped, otherwise the operators will just move them elsewhere.	Through retrofitting technology, almost all of the current fleet can be upgraded, preventing scrappage of vehicles. Those that cannot be retrofitted are proposed to be repowered rather than scrapped.
Buses should be supported to upgrade to electric fleets. It should be mandatory that buses upgrade to electric fleets.	The Council is requesting funding from central government and working with local operators to ensure the fleet is upgraded to meet the Euro VI emission standard. Technology is emerging to upgrade buses to electric and trials will be encouraged where practical.
Concern that the details and terms of financial support have not been provided to all coach operators and as such they are unsure whether it is applicable. Requests for greater clarity on the fleet replacement scheme. Consideration that coaches are low polluting per passenger and should be supported.	Financial support will be available to businesses, charitable organisations and individuals in B&NES and neighbouring authorities to upgrade non-compliant vehicles, including coaches. The Council will continue to work closely with businesses to ensure they are aware of the options available to them. It is possible to register interest for financial assistance on the B&NES webpage. More information on these support packages will be released when available.

7.3.4 Comments on financial support for vehicle upgrades

Respondents provided comments on the support package to provide financial support to affected local businesses and individuals to upgrade their vehicles. The consultation leaflet explained that financial support will be available to businesses, charitable organisations and individuals in B&NES and neighbouring authorities to upgrade non-compliant taxis, PHVs, LGVs, vans, HGVs, buses and coaches. This will improve air quality and reduce the financial burden on the local economy. It could include:

- Grants and/or interest-free finance for upgrading pre-euro 6 diesel and pre-euro 4 petrol vehicles; and
- Grants and/or interest free finance to install electric charging points to further encourage the uptake of electric vehicles.

The comments included suggestions such as only providing grants and finance to upgrade to electric vehicles, basing funding on means testing and ensuring that funding is of a sufficient amount to support vehicle upgrades. Respondents also expressed concerns that the scheme would not be sufficient to upgrade their vehicles and that they did not want to take on additional debt.

Further detail on the comments and responses to these, are provided in Table 7-8.

Table 7-8: Comments on financial support for vehicle upgrades

Comment / issue / question raised	Response/ how addressed
Suggestion that support should be provided on a means tested basis and for requests to be scrutinised thoroughly to prevent any misuse. Low profit businesses employing local people and those on low incomes should be prioritised.	The details of the financial support scheme are still being finalised. Support will be made available to those that need it most on a first come first served basis. There will be a number of criteria considered to evaluate each application. Those applications found not to be eligible for financial support on affordability grounds will be able to register for a concession.
The financial support should be provided to upgrade to electric vehicles, bikes or electric bikes but not for new internal combustion (diesel or petrol) engines. Support should be available for the upgrade of vehicles (including LGVs) to electric vehicles.	Uptake of electric vehicles through the financial support scheme is encouraged, however currently it is not possible in some circumstances to replace non-compliant diesel and petrol vehicles with a suitable electric equivalent as the technology is still emerging.
Enable the financial support to be used by individuals, emergency vehicles and / or disabled people to upgrade their private vehicles to less-polluting vehicles to assist in further lowering emissions.	The financial assistance schemes are being targeted to support those most impacted by the scheme, including businesses and individuals. Travel advisors will also be able to provide guidance for all drivers to reduce their contribution to air pollution in Bath.
Even with support it may not be possible for people, namely traders, to upgrade their vehicles as they will still lose money.	The financial support schemes are designed to help as many people affected as possible. Those applications found not to be eligible for financial support on affordability grounds will be able to register for a concession.
Concern that a loan will not be sufficient, and that support is limited as: People do not want to take on any debt in the form of a loan People do not have sufficient funds to repay a loan	The financial support scheme also includes provision of grants. Those applications found not to be eligible for financial support on affordability grounds will be able to register for a concession.
By only providing grants for "like-for-like" upgrades, this will discourage those who want to purchase a smaller vehicle.	The requirement for like-for-like upgrades ensures that the amount of financial support received from the scheme is fair and proportional to the replacement vehicle being acquired. The vehicle purchased using financial support will be at the choice of the owner and could be used towards the purchase of a smaller vehicle.
Businesses should be expected to upgrade their vehicles from their own profits before a grant or loan is offered with the exception being non-profit organisations and municipal transport which should be supported.	To mitigate the economic impact of the scheme financial assistance will be available for all non-compliant vehicle users to apply for.
It is not clear what support will be provided to support private van / campervan owners to mitigate the impact of the charge. How will they be supported to upgrade?	Financial assistance will be available for all non-compliant vehicle users to apply for, including individuals. Those applications found not to be eligible for financial support on affordability grounds will be able to register for a concession.
Instead of a loan, vehicles should be discounted by 50% or business tax reductions should be offered.	The grant effectively provides a discount in a replacement vehicle. Business tax reductions are not possible as part of this scheme.
Queries about what funding and support will be available for HGVs.	Financial assistance will be available for all non-compliant vehicle users to apply for. Those applications found not to be eligible for financial support on affordability grounds will be able to register for a concession.

7.3.5 Comments on the provision of travel advisors

Respondents provided comments on the support package to provide travel advisors. Travel advisors will be available to help residents and businesses to access the support on offer, as well as encouraging the switch to cleaner, more sustainable modes of travel and transport.

Comments received in the consultation included suggestions on which locations the advisors should work in and expressed support for travel advisors promoting walking and cycling.

Further detail on the comments and responses to these, are provided in Table 7-9.

Table 7-9: Comments on the provision of travel advisors

Comment / issue / question raised	Response/ how addressed
Travel advisors who are familiar with the area should be used.	The travel advisors will work closely with the Council and local residents and will all be given comprehensive training and background briefings prior to commencing their roles.
Travel advisors are important for St John's Road residents.	Noted.

7.3.6 Comments on the provision of anti-idling enforcement

Respondents provided comments on the support package to provide anti-idling enforcement to discourage drivers from running their engines whilst waiting. Comments were generally supportive of measures to enforce anti-idling with some expressing concern about its enforcement.

Further detail on the comments and responses to these, are provided in Table 7-10.

Table 7-10: Comments on the provision of anti-idling enforcement

Comment / issue / question raised	Response/ how addressed
How will anti-idling be enforced? What legislation will be used to enforce the scheme?	Anti-idling enforcement is included in the bid for funding from the Clean Air Fund. Further details can be found in FBC-08 'Option Assessment Report' Appendix C of this FBC. It will be enforced by the use of anti-idling enforcement powers under The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002
What is the limit of idling allowed? How long after being stationary should engines be turned off? Forcing people to turn off engines every time their vehicle stops is not suitable as it would deteriorate engines and increase pollutants.	Noted. The details of the proposed anti-idling scheme are still under development and will be released in due course. All enforcement would be undertaken in line with the requirements of the legislation.
Suggestions for anti-idling enforcement: <ul style="list-style-type: none"> Expand the number of traffic wardens Provide enforcement officers Ensure the fine is significant Allowing one warning and then issue fines Signage detailing the impact of idling on air quality should be provided 	Funding for two anti-idling enforcement officers and anti-idling signage forms part of the implementation fund bid to central government. All enforcement would be undertaken in line with the requirements of the legislation.
Concern that the scheme will create congestion which people will have no choice but to sit in and idle and face a fine for it.	Noted. The details of the proposed anti-idling scheme are still under development and will be released in due course.

Comment / issue / question raised	Response/ how addressed
Support for anti-idling enforcement on St. John's Road and Bathwick.	Noted.
Concern that funding for anti-idling enforcement has not been approved by DEFRA.	Funding for two dedicated anti-idling enforcement officers and anti-idling signage forms part of the implementation fund bid to central government.

7.3.7 Comments on the provision of weight restriction enforcement

Respondents provided comments on the support package to provide weight restriction enforcement. Comments included questions and suggestions regarding the enforcement of weight restrictions and the location of weight restrictions. Other comments details reasons for concerns enforcement being difficult and impacts of weight restrictions for goods deliveries.

Further detail on the comments and responses to these, are provided in Table 7-11.

Table 7-11: Comments on the provision of weight restriction enforcement

Comment / issue / question raised	Response/ how addressed
How will weight restrictions be enforced? Concern that currently restrictions which are in place are not enforced so how will these be?	The powers to enforce weight restrictions are available to both the Council and the Police using environmental weight limit enforcement powers under the Road Traffic Regulation Act 1984.
Suggestions for the enforcement of the weight restrictions included: <ul style="list-style-type: none"> Build a barrier as in Marlow Use the ANPR cameras which are installed for the CAZ to enforce this Should include more than signs 	The powers to enforce weight restrictions are available to both the Council and the Police using environmental weight limit enforcement powers under the Road Traffic Regulation Act 1984.. As part of the Scheme the Council will review existing signage as appropriate.
Support for weight restriction enforcement on: <ul style="list-style-type: none"> All roads (with strict exemptions where necessary) Brook Road railway bridge Egerton and Hensley Road Consideration that weight restriction enforcement is critical for the success of the scheme.	Weight restrictions are proposed to be enforced on roads with existing weight limits under the current proposals.
Width should be considered as well as weight and should be set at 6ft 6in. The width restriction on Lansdown Lane is currently 6ft as it is too narrow.	Noted.
HGVs which are diverted as a result of the scheme are a concern for many residents.	It is not anticipated that there will be any significant diversions as part of the scheme. The Council will monitor any changes for further detail on the proposed monitoring see the FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.
The weight restrictions will have a negative impact on residents who will no longer be able to have goods delivered.	Weight restrictions are proposed to be enforced on roads with existing weight limits under the current proposals. There will be an exemption in place to enable continued access.
Concern that funding for weight restriction enforcement has not been approved by DEFRA.	Funding for weight restriction enforcement forms part of the implementation fund bid to central government.

7.4 Feedback on support packages for which funding is yet to be confirmed

Question 5 asked respondents to comment on the support packages for which funding has yet to be confirmed. These included:

- Last mile delivery and servicing support for businesses within the CAZ;
- Incentives for van drivers to use the park and ride sites; and
- Additional EV charging points for van and taxi / PHV drivers.

Of the 597 questionnaires received, 260 responded to the tick-box question and / or the open text question, therefore expressing a view on the support packages.

7.4.1 Quantitative analysis

Of the 597 questionnaire respondents, 169 respondents (28%) indicated whether at least one of the proposed measures were applicable to them and 221 respondents (37%) indicated whether at least one of the proposed measures were useful to them.

Table 7-12 shows the responses to the part of question 5 which asked whether the support measures were applicable to the respondent / their business.

Table 7-12: Question 5: Unfunded support packages applicable to the respondent / their business

Funded Support Packages	Applicable to you / your business? (Percentages are based on the 169 respondents to this question)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	40	24%	104	62%	12	7%
Incentives for van drivers to use the park and ride sites	27	16%	114	67%	11	7%
Additional EV charging points for van and taxi / PHV drivers.	52	31%	97	57%	10	6%

Of 169 respondents, the measure which most respondents identified as being applicable to them / their business were the additional EV charging points (31%).

When split into individuals and businesses / organisations (using responses to Question 11), 90% of the 169 respondents to Question 5 were individuals, 9% were businesses / organisations and 1% did not state. Table 7-13 and Table 7-14 show the responses to the part of Question 5 which asked whether the proposed revenue measures were applicable to them, split by individuals and businesses / organisations.

Of 153 individual respondents, the measures which most identified as being applicable to them were the additional EV charging points (31%). The measure most applicable to the business / organisation respondents was considered to be the last mile delivery with 47% of the 15 business / organisation respondents identifying this.

Table 7-13: Question 4: Unfunded support packages useful to individual respondents

Funded Support Packages	Applicable to you / your business (Individual respondents)? (Percentages are based on the 153 individual respondents)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	32	21%	97	63%	11	7%
Incentives for van drivers to use the park and ride sites	25	16%	103	67%	11	7%
Additional EV charging points for van and taxi / PHV drivers.	47	31%	90	59%	7	5%

Table 7-14: Question 4: Unfunded support packages useful to business / organisation respondents

Funded Support Packages	Applicable to you / your business (business / organisation respondents)? (Percentages are based on the 15 business / organisation respondents)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	7	47%	7	47%	1	7%
Incentives for van drivers to use the park and ride sites	2	13%	10	67%	0	0%
Additional EV charging points for van and taxi / PHV drivers.	4	27%	7	47%	3	20%

Table 7-15 shows the responses to the part of question 5 which asked whether the support measures were useful to those affected.

Table 7-15: Question 5: Unfunded support packages useful to those affected

Funded Support Packages	Useful to those affected? (Percentages are based on the 221 respondents to this question)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	141	64%	18	8%	42	19%
Incentives for van drivers to use the park and ride sites	107	48%	54	24%	45	20%
Additional EV charging points for van and taxi / PHV drivers.	162	73%	20	9%	25	11%

Of 221 respondents, the measures which most respondents identified as being useful were the additional EV charging points (73%) and last mile delivery and servicing support for businesses (64%).

When split into individuals and businesses / organisations (using responses to Question 11), 94% of the 221 respondents to Question 5 were individuals, 5% were businesses / organisations and 1% did not state. Table 7-16

and Table 7-17 show the responses to the part of Question 5 which asked whether the proposed revenue measures would be useful to those affected, split by individuals and businesses / organisations.

Of 207 individual respondents, the measures which most identified as being applicable to those affected were the additional EV charging points (72%). The measure considered to be most useful by business / organisation respondents was also considered to be the additional EV charging points with 92% of the 12 business / organisation respondents identifying this.

Table 7-16: Question 5: Unfunded support packages useful to those affected- individual respondents

Funded Support Packages	Useful to those affected? (Individual respondents)? (Percentages are based on the 207 individual respondents)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	132	64%	16	8%	39	19%
Incentives for van drivers to use the park and ride sites	98	47%	50	24%	44	21%
Additional EV charging points for van and taxi / PHV drivers.	150	72%	18	9%	25	12%

Table 7-17: Question 5: Unfunded support packages useful to those affected - business / organisation respondents

Funded Support Packages	Useful to those affected? (business / organisation respondents)? (Percentages are based on the 12 business / organisation respondents)					
	Yes		No		Not Sure	
Last mile delivery and servicing support for businesses within the CAZ	8	67%	1	8%	3	25%
Incentives for van drivers to use the park and ride sites	8	67%	3	25%	1	8%
Additional EV charging points for van and taxi / PHV drivers.	11	92%	1	8%	0	0%

7.4.2 Qualitative analysis

Of the 597 questionnaires submitted, 93 respondents commented on question 5, providing free-text responses.

Respondents provided comments on the support packages for which funding is yet to be confirmed. Generally, respondents were supportive of reducing the number of vans and commercial vehicles in Bath and perceived the support packages to enable this.

7.4.3 General comments on the proposed support packages

Respondents expressed general support for the initiatives which reduce the number of vans and commercial vehicles in Bath. Support for the measures was also expressed as it was considered that they would reduce the impacts of businesses and therefore knock on impacts on residents. Conversely, comments also expressed concern that the initiatives encourage vans and commercial vehicles in the centre. Further detail on the comments and responses to these, are provided in Table 7-18.

Table 7-18: Comments providing general feedback on proposed support packages (funding yet to be confirmed)

Comment / issue / question raised	Response/ how addressed
It is important that removing private cars from the scheme does not remove incentives and support to reduce the numbers of private vehicles.	Travel advisors will be available to provide guidance to all drivers on how they can reduce their contributions to air pollution.
The overall scheme offers an opportunity to reduce the number of vans and commercial vehicles in the city centre. However, the proposed support packages encourage them.	Support for commercial vehicle and van drivers is available to help them upgrade to cleaner vehicles. The aim of this scheme is not to address congestion in Bath but to improve air quality in the city.
<p>The proposed support packages do not support the general public / residents.</p> <p>No support packages are proposed for the areas that will receive increased flows and, as a result, have decreased air quality.</p> <p>Support packages should focus on streets/areas affected.</p>	<p>The financial assistance schemes are being designed to support those most impacted by the scheme, for example commercial vehicle users and small businesses. Funding from central government is limited and therefore the Council needs to support those who need it most. Travel advisors will be able to provide guidance for all drivers to reduce their contribution to air pollution in Bath.</p> <p>It is not anticipated that there will be any significant diversionary impacts as part of the scheme. The Council will monitor any changes for further detail on the proposed monitoring see the FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p>

7.4.4 Comments on last mile delivery and servicing support

Respondents expressed general support for last mile delivery support for businesses and made suggestions for the consideration in the development of this.

Further detail on the suggestions made and responses to these, are provided in Table 7-19.

Table 7-19: Comments on last mile delivery and servicing support

Comment / issue / question raised	Response/ how addressed
Suggestion to support last mile delivery between certain times and allow normal deliveries to be undertaken between 7 pm and 7 am.	These points are noted.
Final mile could easily be done by bike or electric assisted bike. Suggest that a centralised eco-hub be developed to enable last mile e-cargo bike deliveries.	<p>The Council is requesting funding from the Clean Air Fund for the following measures:</p> <ul style="list-style-type: none"> • Delivery and servicing planning for small businesses • Last-mile delivery services, including designated storage depots and electric cargo bikes • Electric van and car hire facilities, with designated parking bays
Concern that not all van drivers are delivery drivers and as such, this measure will not support them	The final details of these schemes will be established when funding is confirmed.
Concern that the service will increase the price of deliveries for Bath residents.	
<p>Where will the transfer of goods take place?</p> <p>Concern that this will encourage vans to park on the outskirts of the zone. Suggestion that this could be at Park and Ride sites.</p>	

7.4.5 Comments on incentives for van drivers to use the park and ride sites

Respondents expressed concern about the practicalities of van drivers using the park and rides whilst others noted that encouraging the use of park and rides could reduce emissions. Further detail on the comments and responses to these, are provided in Table 7-20.

Table 7-20: Comments on incentives for van drivers to use the park and ride sites

Comment / issue / question raised	Response/ how addressed
Concern that van drivers will be unable to use the Park and Ride as they will not be able to carry their tools / parcels.	Discussions with JAQU suggest that they will not fund this measure. If funding is not made available through the Clean Air Fund, this measure could be actioned if there is surplus revenue available.
What incentives will be included as part of this measure?	
Encouraging the use of park and ride will increase the number of vans using surrounding residential and school streets (North Road / Rush Hill). This will push the problem to the outskirts.	
Are there plans for more park and rides to be able to achieve this? Will park and rides be expanded to accommodate this?	
Could the existing park and rides be used as a local distribution hub where zero-emission vehicles transport goods into the city centre?	
Will new park and rides be provided? A new park and ride should be provided to the east of Bath for vans.	
Concern that van drivers will not use the Park and Ride and will instead park on the outskirts of the zone.	

7.4.6 Comments on additional EV charging points

Respondents outlined support for providing electric vehicle charging points for van and taxi drivers with suggestions for the charging points to be available to all vehicles.

Further detail on the comments and responses to these, are provided in Table 7-21.

Table 7-21: Comments on additional EV charging points

Comment / issue / question raised	Response/ how addressed
Suggestions for charging points to be installed <ul style="list-style-type: none"> at park and rides; on street; in all car parks and hospitals; and on the road to prevent more narrowing of the pavements. 	Discussions with JAQU suggest that they will not fund this measure. If funding is not made available through the Clean Air Fund, this measure could be actioned if there is surplus revenue available. The Council also continues to work on wider EV charging schemes, facilitated by other sources of funding from central government.
Suggestion that the charging points should be open to private car drivers as well to prompt an upgrade the cleaner fleets.	
Will the charging points be free for the driver?	

7.4.7 Comments suggesting additional / alternative support packages

Respondents provided alternative and additional suggestions for support packages. Suggestions included a number of improvements for active modes and public transport and support for providing electric vehicle charging points with suggestions for the charging points to be available to all vehicles.

Further detail on the comments and responses to these, are provided in Table 7-22.

Table 7-22: Comments suggesting additional / alternative support packages

Comment / issue / question raised	Response/ how addressed
All of the initiatives should be part of a larger vision and strategy to transform the way people move around the city. The long-term aim should be to discourage vehicles and encourage public transport, walking and cycling.	The Council continues to work to promote mode shift across the city in line with the Getting Around Bath Transport Strategy.
<p>Preference for funding to be spent on active mode incentives rather than motor vehicles or for the measures to encourage active travel to accompany the scheme.</p> <p>Suggestions for active modes included:</p> <ul style="list-style-type: none"> • Improve safe routes to school by widening footpaths and adding cycle lanes; • Additional / better timed pedestrian crossings • Slow traffic speeds to make it safer for pedestrians • Encourage cycling in the city through additional cycling lanes and fixing potholes • Invest in cargobike schemes 	<p>These measures could be funded by surplus revenue. Funding available from central government is to help mitigate the impact on those affected by the charges, including passenger transport and commercial vehicles. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel.</p> <p>Improvements to walking and cycling infrastructure will be further considered as part of the wider transport strategy for Bath.</p> <p>Funding for electric cargo bikes is being requested from central government as part of alternative delivery and servicing measure.</p>
<p>Public transport should be generally improved as a support package. This should include:</p> <ul style="list-style-type: none"> • Free public transport for children • Cheaper for all users • Public ownership of buses • Use cleaner/environmentally friendly buses / companies rather than the most cost effective • Review and improve the routes and frequency of buses • Improving public transport would encourage fewer private vehicles 	<p>Public transport improvements could be funded by surplus revenue. Funding available from central government is to help mitigate the impact on those affected by the charges, including passenger transport and commercial vehicles.</p> <p>Support from the Clean Technology Bus Fund has already been secured to help bus operators retrofit their engines or support them to replace their vehicles to meet the minimum emission standards required by the CAZ. Further funding from central government has also been requested to ensure that all registered local buses are upgraded, in order that the entire fleet is compliant with the CAZ framework standards ahead of the zone coming into force.</p>
<p>Suggestions to tackle tourist buses:</p> <p>Scrap the tourist bus which circulate around Bath not at full capacity</p> <p>Prevent / ban tour buses from operating in the city and encourage visitors to use public transport</p>	All coaches and buses will be required to meet the minimum emission standards of the scheme or pay the charge. It is not the aim of this scheme to ban or prevent vehicle movements in the city. Tourism is an important industry in Bath, providing a significant contribution to the local economy.
Encourage and assist people to upgrade their vehicles to electric	The financial assistance scheme will be available to help those affected by charges to upgrade to electric vehicles. Travel advisors will also be available to advise all drivers how they can reduce their contribution to air pollution.
<p>The scheme should closely monitor increases / changes to traffic in the surrounding area.</p> <p>Suggestions include:</p>	It is not anticipated that there will be any significant diversions as part of the scheme. The Council will monitor any changes for further detail on the proposed monitoring see FBC-26 Evaluation,

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> Review commercial and non-commercial rat running to enable the CAZ to be expanded where necessary Enforcement on residential speed limits on the edge of the zone Additional 20 mph speed limits 	Monitoring and Benefits Realisation Plan in Appendix R of the FBC.
Accompany the scheme with a reduction in car parking.	Parking is reviewed under the B&NES Parking Strategy and is outside the remit of this scheme.
Build a coach park to the east of Bath for coaches travelling from London and provide a shuttle service into the centre.	Coach parking is reviewed under the B&NES Coach Parking Strategy and is outside the remit of this scheme.
Support for a scrappage scheme for all polluting vehicles. Ask for money for a scrappage scheme for polluting private and other vehicles.	A scrappage scheme will not be offered as part of this scheme. A financial support scheme is offered as an alternative way to promote the replacement of non-compliant vehicles.
Promoting non motor-vehicle use such as takeaway delivery bikes over motor vehicles.	The Council continues to work to promote mode shift across the city in line with the Getting Around Bath Transport Strategy.

8. Feedback on reinvesting revenue

8.1 Context

Question 6 asked respondents to provide their comments on how revenue from the zone will be reinvested.

Revenue from the scheme will be reinvested into measures which encourage more sustainable transport and travel among all motorists. It is planned to create a steering group of councillors, business representatives and other interest groups to help review and prioritise proposals.

Question 6 was asked in two parts: a tick box question allowing respondents to express their level of support for the revenue funded initiatives, followed by an open text box for any further comments. Both the quantitative analysis (of the tick boxes) and qualitative analysis (of the open text question) are summarised below.

Suggested revenue funded initiatives in the questionnaire included:

- Enhancing the supporting measures already being provided to help offset the impact of the CAZ on businesses and individuals;
- Enhancing the monitoring and evaluation of the scheme and implementing contingency plans if required;
- Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods;
- Supporting walking, scooting and cycling to school initiatives and creating school streets;
- Supporting and enhancing the public transport network, including home to school transport;
- Providing additional park and ride capacity at existing park and ride sites and on existing bus routes;
- Providing schemes to reduce the impact of vehicles on the health and wellbeing of residents and visitors;
- Enhancing other sharing schemes such as the electric cycle hire scheme; and
- Supporting the development of a mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel.

8.2 Overview of responses

Of the 597 submitted questionnaires, 438 included responses to at least one part of question 6. Where letters and emails included comments on this topic these are also included below.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Overall opinions on the **reinvestment of revenue** were predominately in favour of supporting and improving public transport, walking and cycling infrastructure and travel to school initiatives such as walk, cycle and scoot to school. Reasons provided for the support of public transport and active modes improvements centred around them providing an opportunity for modal shift, therefore improving air quality further. For similar reasons, respondents provided suggestions for improvements to Park and Ride facilities which included providing additional capacity and sites, decreasing the price, and extending the operating times. Respondents also expressed support for the monitoring and evaluation of the scheme and provided suggestions of where, what and how to measure changes associated with the scheme.

8.2.1 Quantitative analysis

Of the 597 questionnaire respondents, 438 respondents (73%) expressed their level of support for at least one initiative.

Table 8-1 shows the feedback to question 6 which asked respondents for comments on how revenue from the zone will be reinvested.

Table 8-1: Comments on how revenue from the zone will be invested

Suggested revenue funded initiatives	Number of times ranked						
	5 (Support)	4	3 (Neutral)	2	1 (Do not support)	Don't know	No ranking
Enhancing the supporting measures already being provided to help offset the impact of the CAZ on businesses and individuals;	151 (35%)	61 (14%)	111 (26%)	12 (3%)	34 (8%)	18 (4%)	41 (10%)
Enhancing the monitoring and evaluation of the scheme and implementing contingency plans if required;	182 (42%)	87 (20%)	77 (18%)	11 (3%)	22 (5%)	15 (4%)	34 (8%)
Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods;	311 (73%)	44 (10%)	32 (7%)	7 (2%)	16 (4%)	2 (0%)	16 (4%)
Supporting walking, scooting and cycling to school initiatives and creating school streets;	302 (71%)	52 (12%)	32 (7%)	5 (1%)	14 (3%)	3 (1%)	20 (5%)
Supporting and enhancing the public transport network, including home to school transport;	349 (82%)	43 (10%)	7 (2%)	1 (0%)	12 (3%)	0 (0%)	16 (4%)
Providing additional park and ride capacity at existing park and ride sites and on existing bus routes;	233 (54%)	68 (16%)	54 (13%)	15 (4%)	29 (7%)	8 (2%)	21 (5%)
Providing schemes to reduce the impact of vehicles on the health and wellbeing of residents and visitors;	249 (58%)	49 (11%)	64 (15%)	7 (2%)	18 (4%)	14 (3%)	27 (6%)
Enhancing other sharing schemes such as the electric cycle hire scheme; and	196 (46%)	73 (17%)	81 (19%)	14 (3%)	33 (8%)	9 (2%)	22 (5%)
Supporting the development of a mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel.	124 (29%)	69 (16%)	103 (24%)	17 (4%)	37 (9%)	43 (10%)	35 (8%)

Respondents showed support for all of the measures as all measures were ranked as 5 (Support) more than they were ranked as 1 (Do not support). The measures which were most frequently rated 5 were:

- Supporting and enhancing the public transport network, including home to school transport (82% of question respondents expressed support for this);
- Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods (73% of question respondents expressed support for this); and
- Supporting walking, scooting and cycling to school initiatives and creating school streets (71% of question respondents expressed support for this).

The measure which was least supported by respondents was supporting the development of a mobility as a service platform.

8.2.2 Qualitative analysis

Of the 597 questionnaires submitted, 163 respondents included responses to the open text part of question 6.

Many respondents commented on initiatives to improve monitoring, walking and cycling, walking and cycling to school, improvements to the public transport and parking and ride. Respondents also provided other uses for the revenue and alternative scheme suggestions. Generally, the scheme comments were supportive of public transport, walking and cycling improvements as they considered that these improvements would enable a shift away from private vehicles which they highlighted as currently difficult.

8.2.3 General comments relating to the revenue funded initiatives

General comments on the initiatives proposed to be funded by any surplus revenue from the zone included support and concerns. Comments expressed support for the initiatives as a whole or for specific initiatives, which were considered welcome, brave and adequate. Some comments stated that the measures were necessary to improve air quality, as well as providing health and social benefits. Respondents also expressed their concerns with the initiatives and scheme such as the plan being inadequate and the cost of the initiatives. Respondents also commented on the survey question and consultation.

Further concerns, comments on the consultation and responses to these are provided in Table 8-2.

Table 8-2: General comments relating to the revenue funded initiatives

Comment / issue / question raised	Response/ how addressed
Concerns regarding revenue / initiatives	
<ul style="list-style-type: none"> Concern that expenditure of revenue will be politically motivated and benefit the more affluent. Concern that residents will not benefit from the revenue from the scheme. Concern that there is no evidence that the measures will improve or support the scheme. Supportive of the initiatives but concern that they will not all be implemented due to the cost and will not all be used by the public. 	<p>Any surplus revenue from the scheme will be administered by the proposed Steering Group. Feedback from this consultation and other engagement with stakeholders will feed into their decision-making process and prioritisation of these measures.</p> <p>Any revenue funded measures are not required to meet compliance but will support further air quality improvements across B&NES.</p>
Concern that the public will be paying for the measures through the increased price of goods / traders who will pass on the charge.	Financial support packages are proposed to help non-compliant vehicle users to replace their vehicles. With this support many commercial vehicles will not incur a charge and therefore this will not be passed on to customers.

8.2.4 Comments relating to enhancing the monitoring and evaluation of the scheme

Respondents were generally supportive of activities to monitor the impact of the CAZ. However, some raised questions about how the monitoring process would work and which locations would be monitored.

Further comments and responses to these are provided in Table 8-3.

Table 8-3: Comments on enhancing the monitoring and evaluation of the scheme

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> Commitment to monitoring the scheme and immediate necessary enhancements is essential to establish confidence from residents. Monitoring will need be reviewed as many badly affected sites do not appear to be being monitored currently. Monitoring should include monitoring of traffic in neighbouring areas. How will residents be able to report high levels of pollution? Ensure that pollution levels are monitored constantly, and data is published real time. Support for a robust monitoring and evaluation plan which considers air quality and displacement of traffic, within and outside the CAZ. 	<p>A detailed and comprehensive approach to monitoring is proposed as part of the scheme.</p> <p>See FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC for full details.</p>

8.2.5 Comments relating to maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods

Comments on how any surplus revenue might be used to maintain and enhance the existing walking and cycling network and create low traffic neighbourhoods were generally supportive of improving active modes infrastructure. Comments focused on increasing the attractiveness and safety of walking and cycling through providing additional crossings, segregated cycle lanes / pavements and secure bike storage.

Further comments and responses to these are provided in Table 8-4.

Table 8-4: Comments on maintaining and enhancing existing walking and cycling network and low traffic neighbourhoods

Comment / issue / question raised	Response/ how addressed
<p>Pedestrians and cyclists have different needs and so shouldn't be considered together.</p>	<p>Walking and cycling are considered separately in Bath's wider transport strategy.</p>
<p>Cycling improvements and incentives should include:</p> <ul style="list-style-type: none"> Cycle lanes (segregated) / routes Stop making cycling difficult for people Provide secure bike storage Provide electric bike charging points Prevent parking in bike lanes Discourage walking and cycling on the pavement <p>Improvement should focus on increasing enjoyment and safety and should be developed with Sustrans / Cycling UK. Promoting and incentivising cycling will help to (cost effectively) reduce the dependency on cars and encourage a modal shift, improving air quality. Currently the infrastructure is not good enough to support this.</p>	<p>Any surplus revenue will be used to fund cycling infrastructure improvements where possible. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel.</p> <p>Improvements to cycling infrastructure will be further considered as part of the wider transport strategy for Bath.</p>

Comment / issue / question raised	Response/ how addressed
Concern about the success of cycling schemes as Bath, even with electric bikes, is too hilly to cycle around. Cycling is not feasible for all trips such as those with parcels.	Any surplus revenue will be used to fund cycling infrastructure improvements where possible. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel. Improvements to cycling infrastructure will be further considered as part of the wider transport strategy for Bath.
Walking improvements and incentives should include: <ul style="list-style-type: none"> • Support for additional pedestrian crossings. • Promote safe cycling that doesn't compromise pedestrian safety. • Support for pedestrianizing streets in the city centre • Include improvements on the Canal Town path Improvement should focus on increasing enjoyment and safety. Promoting and incentivising walking will help to (cost effectively) reduce the dependency on cars and encourage a modal shift, improving air quality. Currently the infrastructure is not good enough to support this	Any surplus revenue will be used to fund pedestrian and facility improvements where possible. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel. Improvements to walking infrastructure will be further considered as part of the wider transport strategy for Bath.
Walking / cycling improvements should consider those with reduced mobility and therefore accessible short walking routes from bus stops, e-bikes and pedestrian space should be considered.	The Council recognises that walking and cycling is not feasible for everyone. Improvements to walking and cycling infrastructure will be further considered as part of the wider transport strategy for Bath.
Concern that the scheme will not create low traffic neighbourhoods as it will increase traffic. Support for low traffic neighbourhoods as a way of improving air quality and ensuring that rat-running traffic does not use residential streets. Suggestion that to achieve this, a Low Traffic Neighbourhood Plan should be developed.	Noted. It is not predicted that overall traffic volumes will increase, and the level of re-routing is expected to be low. A low traffic neighbourhood, residents parking and electric charging strategy and policy is being developed for B&NES and will be subject to consultation in early 2020.

8.2.6 **Comments relating to supporting walking, scooting and cycling to school initiatives and creating school streets**

Generally, there was support for reducing school related traffic however questions regarding the definition of school streets and measures undertaken to make a street a "school street" were raised. Further comments and responses to these are provided in Table 8-5.

Table 8-5: Comments supporting walking, scooting, cycling to school initiatives and creating school streets

Comment / issue / question raised	Response/ how addressed
What is the meaning of school streets?	'School streets' are where the street(s) around a school temporarily become pedestrian and cycles only at set times in the morning and afternoon. Vehicles are not permitted to enter the street between these times unless they have been granted an exemption.

Comment / issue / question raised	Response/ how addressed
<p>Concern about possible impacts of School Streets:</p> <ul style="list-style-type: none"> In creating school streets, local residents living on roads by schools should be considered as they still need to drive and park on their road. Many senior schools are on main roads which cannot be shut down. Schools are located in densely built up and high traffic areas, most of this traffic is considered to be locals commuting to work. How will traffic around schools be reduced without encouraging people to move away from Bath? 	<p>Noted. Existing conditions and access requirements will be given due consideration in the development of any school street schemes</p>
<p>School streets should be enforced around Oldfield Park Infant and Junior Schools and implemented in conjunction with schools, teachers and parents.</p>	<p>Noted.</p>

8.2.7 Comments relating to supporting and enhancing the public transport network

In respect of public transport respondents commented on the current provision / cost of public transport including home to school transport and made suggestions to improve the frequency, coverage and cost of public transport. Further comments and responses to these are provided in Table 8-6.

Table 8-6: Comments on supporting and enhancing the public transport network

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> Revenue should be spent on increasing the frequency, coverage and reliability of public transport. Revenue should be spent on decreasing the cost of public transport or making it free as the current cost discourages use and encourages driving. Monthly tickets should be available as it is cheaper and increases loading of buses. The Council should monitor the local bus services to ensure reasonable frequency and cost. Public transport should be improved through public ownership. 	<p>At present, bus services in Bath are operated by commercial companies which are responsible for setting their own fares and routes, as such the Council cannot reduce the cost of bus travel. The Council is working closely with transport operators to ensure all key routes are served and that their impact on air quality is reduced.</p>
<p>School traffic makes up a large proportion of traffic as such, provision of public transport or school transport should be improved to reduce pollution.</p>	<p>The Council recognise that school traffic is a concern for some residents in Bath. Measures to address this will be considered if surplus revenue becomes available as part of the scheme.</p>

Comment / issue / question raised	Response/ how addressed
Buses should be the highest priority improvement. Buses should be upgraded to electric or greener buses.	The Council is working closely with bus operators and it is anticipated that buses servicing the city will be compliant before the scheme is implemented. Support from the Clean Technology Bus Fund has already been secured to help bus operators retrofit their engines or support them to replace their vehicles to meet the minimum emission standards required by the CAZ. Any surplus revenue from the scheme will be administered by the proposed Steering Group. Feedback from this consultation and other engagement with stakeholders will feed into their decision-making process and prioritisation of these measures.

8.2.8 Comments relating to enhancing park and ride sites

One of the proposed initiatives in the survey was for revenue to be used to provide additional park and ride capacity at existing park and ride sites and on existing bus routes. Respondents, including Pulteney Estate Residents Association (PERA) and The Abbey Residents Association (TARA), commented in support of providing the additional capacity but also suggested other improvements to be made to park and rides such as the frequency and cost.

Further comments and responses to these are provided in Table 8-7.

Table 8-7: Comments on enhancing park and ride sites

Comment / issue / question raised	Response/ how addressed
Additional park and ride capacity should include motorhome parking spaces	Noted.
A park and ride should be provided on each side of the city, so people do not need to cross the city to get to a park and ride. Some suggested a site on the East of Bath whilst others stated there was not a suitable location to the East and an additional park and ride would erode the green belt.	The Council continues to explore innovative sustainable transport options in Bath to address future demand for travel and to facilitate further mode shift from cars for travel into the city. This could include a network of small car and bike parks on existing bus routes to the east of Bath.
Park and Rides are not the solution as they move the problem elsewhere. People should instead be encouraged not to use their petrol / diesel cars.	Many of the other measures are focussed on improving other modes and encouraging walking and cycling.
Other improvements to park and rides should be considered, including: <ul style="list-style-type: none"> Increasing the frequency of the services Reducing the cost of the park and ride, possibly through charging per car rather than per person Extend services to run later into the evening. Link sites to river transport. 	At present, the park and ride services in Bath are operated by commercial companies which are responsible for setting their own fares, times and routes.

8.2.9 Comments relating to the other proposed initiatives

Respondents commented on the other proposed initiatives as summarised below. Comments and responses to these are provided in Table 8-8.

Table 8-8: Comments relating to the other proposed initiatives

Comment / issue / question raised	Response/ how addressed
Sharing schemes such as the electric cycle hire scheme	
Electric bikes are a low pollution way to enable movement around Bath whilst reducing congestion and should be supported. They should be available to rent by the public such as at the park and ride sites.	Noted. The Council continues to explore options to provide electric cycle hire in the city.
Mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel	
What platform will be used for the MaaS? Many people do not use apps or smart phones and resources should be available for these people.	The details of the proposed MaaS service are still under development and will be released in due course.
Steering Group	
The proposed steering group would need the support of independent urban transport experts to set informed priorities. WECA representatives should sit on the steering committee. Requests to sit on the steering group.	Noted. The constitution of the Steering Group is being discussed and will be informed by the comments received in the consultation. It is planned to create a steering group of councillors, business representatives and other interest groups to help review and prioritise proposals. It is expected that B&NES officers will bring forward the majority of proposals, following discussions with independent experts, stakeholders and other interest groups.

8.2.10 Comments suggesting other uses for the scheme revenue

Respondents provided alternative and additional uses for the revenue generated by the zone such as improving electric vehicle infrastructure, changing speed limits and changes to current parking provisions.

Comments and responses to these are provided in Table 8-9.

Table 8-9: Comments suggesting other uses for the scheme revenue

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> On-street charging for electric vehicles, particularly for those in flats with no off-street parking. Offer discounts on electric cars. Reduce speed limits from 30 mph to 20 mph and ensure that this is enforced. Cameras should be used to enforce speed limits on roads outside the CAZ boundary. Ensure traffic signals are correctly and efficiently sequenced. Limit car parking on streets and in the city to encourage a reduction in private car use. Remove parking restrictions outside of the zone to enable people to park and walk. The measures should be implemented before the zone is activated to ensure that increased traffic in residential areas will not have an adverse effect on those living there. Businesses should be forced to encourage and actively promote lift sharing between their employees. This could be through a workplace parking levy. Revenue should be used for the development of sustainable energy. Support the use of motorbikes, mopeds and scooters developing motorbike only lanes. Use the revenue to fund a scrappage scheme for polluting private vehicles. Develop an app / signage for larger vehicles to direct them away from inappropriate narrow or residential roads. Construct a ring road / bypass to enable large traffic to avoid Bath city centre. Use the funding to prevent and address the negative impacts as a result of CAZ, such as increased parking and rat running outside of the zone. Increase and encourage hedge planting to ensure absorption of toxic emissions. Ensure only electric boats are able to use the river. Provide a mass transit tram on all major routes into the city. 	<p>Many of these suggestions are already being considered and addressed through other Council strategies and initiatives which are currently under review and will be updated. These suggestions have been passed on to the relevant departments for further consideration and will also be passed on to the Revenue Reinvestment proposed Steering Group.</p>

9. Feedback on the boundary infrastructure

9.1 Context

Question 7 asked respondents to provide their comments on the boundary infrastructure, such as the signs and cameras.

Signage is proposed on the boundary approach, entry and exit to ensure awareness of the Clean Air Zone. Automatic number plate recognition (ANPR) cameras are proposed on the entry / exit and within the zone to capture movement within the zone. It is noted that there are a number of constraints on where signs and cameras can be placed such as existing buried services and sightlines.

9.2 Overview of responses

Of the 597 submitted questionnaires, 104 included responses to question 7. Where letters and emails included comments on this topic these are also included below.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

Respondents made various suggestions on **boundary infrastructure** including comments or suggestions on the placement of street signage and cameras. Queries were raised on the implementation and practicality of associated infrastructure.

Generally, respondents were concerned about the visual impact of additional signage and cameras on the streets and World Heritage Site. Comments suggested methods to ensure the clarity of the signage which included reviewing current levels of signage in the city and suggestions for the content of the signs. Some respondents raised concern about the locations of the signs and cameras having a negative impact on traffic through prompting U-turns and rat running whilst others suggested advanced warning signs to combat this. Some respondents questioned the data collected by the proposed ANPR cameras asking who would handle it and what it would be used for, whilst others suggested additional uses for the cameras.

9.2.1 General comments relating to the boundary infrastructure

General comments on the cost and visual impact of the additional infrastructure were provided. Respondents expressed concerns about the cost of installation and maintenance of the signs and cameras as well as suggesting that adding additional infrastructure to the streets would cause “clutter”.

Table 9-1: General comments relating to the boundary infrastructure

Comment / issue / question raised	Response/ how addressed
<p>Suggestion to remove current unnecessary signage, road markings and furniture before adding more.</p> <p>Concern about the visual impact of the infrastructure as additional items will cause more clutter on the streets.</p> <p>Suggestion to ensure works comply with the Streetscape manual.</p>	<p>The community liaison team will be in touch with residents impacted by any new street furniture and there will be further opportunity to provide any feedback on this as scheme implementation continues. All works will comply with relevant legislation and guidance from central government. The signage has been developed in collaboration with the development management and environment and design teams in the Council.</p>
<p>What is the estimated cost of the signage and camera placement / operations / maintenance?</p>	<p>Costs can be found in FBC-21 Project Costs found in Appendix I of this FBC.</p>

9.2.2 Comments relating to specifically to the proposed signage

Respondents expressed general concern about the signs and the visual impact that they may have on the city. Some raised concerns about the sign placement resulting in “U turns” in inappropriate places, other commented on the information provided on the signs.

Table 9-2: Comments specifically on proposed signage

Comment / issue / question raised	Response/ how addressed
Support for the signage locations around Sydney Gardens / Sydney Road which take into account the built heritage. Other comments expressed concern about the sign at Sydney buildings considering that the sign would cause confusion about which way non-compliant vehicles should go.	
Ensure that signage is obvious, clear and can be read by drivers by: <ul style="list-style-type: none"> maintaining trees; ensuring the text is large enough; stating that private cars are not included; and ensuring the signage is at the correct height for HGV drivers. 	
Ensure that the heritage of the city is respected and maintained by avoiding excessive or inappropriate signage, particularly on Camden Road and Belgrave Crescent. Suggestions for this included: <ul style="list-style-type: none"> amalgamate signage by having multiple signs per signpost; keeping the number of signs to a minimum; ensure the signs are as small as possible; removing the B&NES logo from the signs therefore reducing visual clutter and size; and ensure signage does not obscure the footway. 	Signage will be placed in accordance with JAQU guidance which has been designed to ensure consistent and clear messaging across all local authorities implementing a clean air zone and provide adequate warning about the zone, with due consideration to turn-back options. This will be supported by a national communications campaign. The Council is liaising where necessary with Highways England and neighbouring authorities in relation to the provision of advanced signage.
Signs should also be placed within the CAZ to remind drivers that they are within it. Concern that many signs on the road will confuse drivers. Suggestion that signage which is currently unnecessary is removed. Instead of signs to mark the entry of the zone, consider green tarmac with message on. Display the charge on the signs to ensure affected drivers can divert their routes.	Existing signage is under review and will be rationalised as appropriate to minimise impact on the existing streetscape.
Work with neighbouring local authorities to ensure that advance warning signs are placed on major approach routes, such as the M4, to prevent inappropriate routes being taken to avoid the zone such as via: <ul style="list-style-type: none"> Whiteway Road Frome Road Lansdown Crescent 	

<ul style="list-style-type: none"> • Sion Hill • Hayesfield Park 	
<p>Currently advanced warning signs are too close to the zone and should be further out.</p> <p>Requests for advance warning signs on:</p> <ul style="list-style-type: none"> • Sion Hill and Cavendish Place • Brooks Road • Combe Hill or Claverton Down • London Road • Sion Road 	
<p>Concerns about the signs creating U-turns at:</p> <ul style="list-style-type: none"> • Lyncombe Hill / St Marks Road • North Road • Gay Street • Bathwick Hill. 	<p>Signage will be placed in accordance with JAQU guidance which has been designed to ensure consistent and clear messaging across all local authorities implementing a clean air zone and provide adequate warning about the zone. This should enable drivers to make a decision to seek an alternative route at an appropriate location prior to the entrance to the zone. This will also be supported by a national communications campaign.</p>

9.2.3 Comments relating to specifically to the proposed cameras

Respondents expressed general concern about the cameras and the visual impact that they would have on the city. Some suggested to have no cameras whilst others suggested ensuring that the location and design of cameras is as discrete as possible. Some respondents were concerned about the information that cameras would gather.

Table 9-3: Comments specifically on the proposed camera

Comment / issue / question raised	Response/ how addressed
Where are the camera placements and what size are they?	See the FBC-01 Signage, boundary and camera plans in Appendix A of this FBC.
Support for the camera locations around Sydney Gardens / Sydney Road which take into account the built heritage.	Noted.
Concern about the placement of cameras on Horseshoe walk.	The locations of the cameras, in conjunction with scheme signage, have been carefully considered to ensure that they are sufficient to enforce the scheme and do not create adverse impacts.
<p>Suggestion for cameras to be placed:</p> <ul style="list-style-type: none"> • On Midland Bridge • On Lower Bristol Bridge • Outside the zone to identify rat-running traffic • Before Bathwick St Mary school • At Lansdown Crescent • Henrietta Road 	The locations of the cameras, in conjunction with scheme signage, have been carefully considered to ensure that they are sufficient to enforce the scheme and do not create adverse impacts.
Concern that cameras will encourage U-turns near King Edwards School.	
Concern that Bath has so many streets so there will be a large number of cameras required which will have high installation costs.	The locations of the cameras have been carefully considered to ensure that they are sufficient to enforce the scheme. See the FBC-01 Signage, boundary and camera plans in Appendix A of this FBC.

Comment / issue / question raised	Response/ how addressed
Renewable sources of energy should be used for the cameras and lighting required.	Specialist lighting is not required for this scheme. Cameras require a mains power supply to ensure continuous function.
Concerns about the visual impact of cameras. Request they are as invisible and discrete as possible.	Wherever possible the cameras will be mounted on existing street lighting columns to the number minimise of additional poles required. They will be carefully positioned in order to enforce the CAZ.
Suggestion that if the cameras flash, they should not be placed near to houses.	The cameras will not flash.
Concerned about the data that will be gathered what this will be used for. How long will details be stored for?	The data will be used to determine whether a vehicle is eligible for charge in accordance with the central government database. All data gathered will be retained and used in line with the Councils privacy and data retention policies.
Will ANPR cameras be operated by B&NES Council or will they be used by the police to also check for speeding?	The cameras will be operated by the Council to enforce the clean air zone and are not designed to check for speeding.
Suggestions for additional uses of the cameras included: Creating secure carpooling / hitch hiking locations Identifying speeding vehicles Identify drivers using mobile phones whilst driving	This is not within the remit of the current scheme.
Concern that if the scheme is changed to a CAZ D, the camera locations will not enable residents to travel to local shops, the hospital or supermarkets without charge.	The proposed scheme is a Class C CAZ with traffic management measures. It is not currently proposed to change the scheme to a Class D CAZ.

9.2.4 Comments suggesting additional signage and cameras

Respondents expressed general concern about the cameras and the visual impact that they would have on the city. Some suggested to have no cameras whilst others suggested ensuring that the location and design of cameras is as discrete as possible. Some respondents were concerned about the information that cameras would gather.

Table 9-4: Comments suggesting additional signage and cameras

Comment / issue / question raised	Response/ how addressed
Send people text reminders they have entered the zone and that they are required to pay before issuing fines.	This is not within the remit of the current scheme. To do this would involve tracking vehicle movements which could raise privacy concerns.
Display signing indicating the daily pollution level.	This is under consideration as part of the implementation phase communications strategy.
Increase signage for Lansdown Park and Ride.	Noted.
Request to monitor Englishcombe and Church Street for rat-running.	Noted.
Ensure there is an alternative route signed so vehicles, specifically lorries, do not block roads when turning.	Signage will be placed in accordance with JAQU guidance which has been designed to ensure consistent and clear messaging across all local authorities implementing a clean air zone and provide adequate warning about the zone. This should enable drivers to make a decision to seek an alternative route at an appropriate location prior to the entrance to the zone. This will also be supported by a national communications campaign.

10. Feedback on the draft Charging Order

10.1 Context

Question 8 asked respondents to provide their comments on the **draft charging order**. It is noted that the draft charging order is a legal document that will form the basis for enforcing the zone. It includes details on how the zone will operate, including charges, charging policies, exemptions and concessions. Much of the content was approved by the Council following the previous consultation.

Respondents used this section to provide comments on the charge, particularly the vehicles charged, level of charge and payments. Some respondents also commented on and suggested concessions and exemptions. Many respondents remarked on the inclusion of campervans within the charge suggesting that private campervans and vans should be exempt from charges.

10.2 Overview of responses

Of the 597 questionnaires returned, 116 included comments in response to question 8 on the draft charging order.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

The comments made in respect of the draft charging order included requests for additional exemptions, particularly for campervans / motorhomes, for people with disabilities and for local businesses and residents.

10.2.1 General comments relating to the draft charging order

Respondents provided general concerns and questions relating to the draft charging order including comments on about the implementation, cost and impact of the scheme.

Table 10-1: General comments on the draft charging order

Comment / issue / question raised	Response/ how addressed
General comments	
What are the costs of the implementation and operation?	Costs can be found in FBC-21 Project Costs in Appendix I of the FBC.
What is the evidence that government funding and revenue will cover the cost of the scheme?	The scheme has been subject to detailed financial modelling and assessment to ensure that the costs will be fully covered by designated central government funding and revenue.
Respondents felt that because drivers already pay road tax, they should not have to pay CAZ charges.	The charging approach follows the Government's guidance set out in the Clean Air Framework.
Concern that private cars will be charged in the future.	The technical work undertaken indicates that the Class C CAZ with traffic management measures is sufficient to reduce air quality to within legal limits.
Concern that charge will predominately impact businesses, self-employed and low-income households which would damage Bath's economy.	The analysis undertaken shows that the overall impact of a Class C CAZ would be much less than the predicted impact of the previously proposed Class D CAZ. The supporting measures will help to reduce the impact on those impacted by the charges.

10.2.2 Comments relating to exemptions and concessions proposed in the draft charging order

Respondents commented on exemptions and concessions included within the draft charging order. Many respondents requested additional exemptions, particularly for campervans / motorhomes, for people with disabilities and for local businesses and residents.

Table 10-2: Comments on exemptions and concessions proposed in the draft changing order

Comment / issue / question raised	Response/ how addressed
General comments	
<p>There should be no concessions or exemptions included. Concern that concessions / exemptions will reduce the impact of the scheme. It was felt that robust monitoring of exemptions will be required.</p> <p>Suggestions for vehicles which shouldn't qualify for an exemption included:</p> <ul style="list-style-type: none"> • Diesel taxi - otherwise non-compliant taxis from other parts of the country will be used in Bath • General haulage vehicles <p>Two-stroke engine motorbikes and mopeds should not be exempt as they release unburned hydrocarbons and other pollution into the atmosphere.</p>	<p>National and local exemptions vary. The National exemption list has been provided by central government as part of the Clean Air Zone framework. Local concessions and exemptions are targeted at those groups identified in the Equalities Impact Assessment or providing vital services.</p>
<p>All private vehicles should be exempt regardless of the vehicle classification.</p>	<p>Providing discounts or concessions to large numbers of people would affect the ability of the CAZ to achieve compliance in the shortest possible time. For further information refer to FBC-05 'Proposed System Design Features and Payment Exemptions'.</p> <p>The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. It will be open to limited companies, partnerships, sole traders, charities and individuals located in B&NES and neighbouring authorities with premises in the CAZ or delivering into the CAZ. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.</p>

Comment / issue / question raised	Response/ how addressed
Campervans / Motorhomes	
<p>Consideration that campervans should qualify for an exemption as:</p> <ul style="list-style-type: none"> • They are used as private not commercial vehicles; • Those with campervans provide additional benefits as they offset emissions by not flying and add to local economies; • They are considered differently to commercial vehicles by the DVLA; and • Providing an exemption will reduce rat running. <p>Some respondents were in favour of all campervans receiving exemptions, others provided suggestions for exemption criteria for campervans:</p> <ul style="list-style-type: none"> • Campervans with beds / kitchens as these are not dual-purpose vehicles like 4x4 utility vehicles and car derived pick-ups and therefore should not be charged; • Vintage campervans; and / or • Campervans that are someone's only vehicle. <p>Motorhomes are used as leisure vehicle and often use park and ride facilities. The amount that actually go through the city compared with buses, taxis and lorries is a lot less. It was felt that they should not be charged.</p>	<p>Providing concessions or exemptions to more people would affect the ability of the CAZ to achieve compliance in the shortest possible time. For further information refer to FBC-05 Proposed System Design Features and Payment Exemptions.</p> <p>The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.</p> <p>Historic vehicles are nationally exempt.</p>
Vans	
<p>Residents who own vans within the zone should be exempt. There are very few so exemptions for this group it was felt that this would make little difference to air quality.</p> <p>Suggestion that residents using vans should be exempt until they upgrade their vehicles.</p> <p>Vans with seats, that are classified as PLGs, and primarily used as cars should be exempt.</p>	<p>Providing concessions or exemptions to more people would affect the ability of the CAZ to achieve compliance in the shortest possible time. For further information refer to FBC-05 Proposed System Design Features and Payment Exemptions.</p> <p>The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.</p>
Local businesses	
<p>Concessions should support local businesses to upgrade their vehicles naturally over time without being forced into debt.</p> <p>All businesses, or businesses which meet the following criteria should be supported through concessions, exemptions and/or grants:</p> <ul style="list-style-type: none"> • Local businesses; • Businesses with 3 or more non-complaint vehicles; • Local traders – to ensure they don't go out of business; and • Small businesses. <p>Exempt delivery / pick up vehicles (vans and HGVs) in the zone.</p>	<p>Providing discounts or concessions to large numbers of people would affect the ability of the CAZ to achieve compliance in the shortest possible time. For further information refer to FBC-05 'Proposed System Design Features and Payment Exemptions'.</p> <p>Concessions and exemptions are targeted to the groups for whom alternative modes of transport are not possible or where groups are entirely reliant on their vehicle to make journeys, in order to give them more time to change their vehicle.</p> <p>The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.</p>

Comment / issue / question raised	Response/ how addressed
Those with disabilities	
Various suggestions for additional concession and exemptions to support those with disabilities were included: <ul style="list-style-type: none"> Wheelchair Assisted Vehicles; and Blue Badge holders. 	Euro 4 & 5 diesel vehicles used by registered blue badge holders will be eligible for a registered concession until 31 December 2022. Vehicles adapted for use by disabled people receive an automatic exemption as part of this scheme.
For a carer to qualify for a concession, does the individual have to have a "higher mobility component of benefits" for exemption?	Registered education, health and social care providers providing community education, health and social care services within the proposed zone using Euro 4/5 diesel vehicles, for work purposes, will be eligible for a concession. For further information on concessions refer to FBC-05 'Proposed System Design Features and Payment Exemptions'.
Other exemptions	
Taxis should be exempt because: <ul style="list-style-type: none"> They are routinely used by pensioners; and Charging taxis will increase the price of fares. 	Taxis undertaking multiple journeys within the city centre contribute more than other vehicles to emissions and overall there is a need to set a positive precedent. In addition, newly licensed taxis will be required to be compliant under the new taxi licensing policy which was adopted by Cabinet in December 2018. Hackney carriage fares are regulated by the Council.
Exempt vehicles driving out of the zone, to ensure that it is those who are driving in the city who have to pay. Suggestion that this should be the case for specifically for residents driving out of the zone.	Private cars will not be charged. Offering an exemption to all residents driving out of the CAZ would compromise the ability to reduce air quality to within legal limits in the required timescale.
Residents regardless of vehicle type should be exempt.	Private cars will not be charged. Offering a concession to all residents within the CAZ would compromise the ability to reduce air quality to within legal limits in the required timescale. Concessions and exemptions are targeted to the groups for whom alternative modes of transport are not possible or where groups are entirely reliant on their vehicle to make journeys, in order to give them more time to change their vehicle. The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.
Public transport, buses and coaches should not be charged or should have more time to adapt because: <ul style="list-style-type: none"> Rural services may be reduced if charged; Sustainable transport should be encouraged; and Coaches / buses are low polluting per passenger. 	Grants will be provided to local bus companies to retrofit or repower older, non-compliant buses. This will improve air quality, protect existing bus services and discourage fare rises. Coaches will be eligible for the financial support scheme which is designed to help facilitate switching to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.
Solo motorbikes should have an exemption	These vehicles are exempt in Bath's CAZ
Emergency vehicles should be exempt.	

Comment / issue / question raised	Response/ how addressed
Charities / organisations with minibuses, such as scouts, and dial a ride should be included within the exemptions.	Non-compliant minibuses will be eligible for the financial support scheme which is designed to help facilitate switching to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance There is a concession available for community transport vehicles.
Support the exemption for historic vehicles yet expressed concern about near-historic buses and coaches which are entitled (by age) to be in the historic tax class but for regulatory reasons are registered as Public Service Vehicles.	The Council will operate a discretionary concessions policy which will take account of individual circumstances where appropriate for very specialised and historic vehicles to be used for short periods of time.

10.2.3 Comments relating to charging / the enforcement of the draft charging order

Comments were received relating to the charging and enforcement of the draft charging order. Responses highlighted changes to the timing of the charge and suggested additional vehicles to be included within the charge. The majority of respondents raised questions about the vehicles charged and the practicalities of charging.

Table 10-3: Comments on charging/enforcement of the draft charging order

Comment / issue / question raised	Response/ how addressed
General comments about the charge	
<p>Disagreement with the charge applying to:</p> <ul style="list-style-type: none"> Private vans that are used as cars and can't offset the tax; Small vans used by small businesses. It was noted that some cars, which are not included in the charge, are more polluting than small / medium vans which are included in the charge; Campervan which are private vehicles, fit the definition of a car, can't offset the tax and have no retrofitting option; Taxis / PHVs; and Public service vehicles, such as buses and coaches, which will increase fares to cover the costs Recovery vehicles. 	<p>A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time.</p> <p>Concessions and exemptions are targeted to the groups for whom alternative modes of transport are not possible or where groups are entirely reliant on their vehicle to make journeys, in order to give them more time to change their vehicle.</p> <p>The financial support scheme is designed to help individuals, businesses and organisations with non-compliant vehicles to switch to compliant vehicles. This provides an alternative way to mitigate the impacts but still enables the air quality improvements needed to achieve compliance.</p> <p>Recovery vehicles have a concession.</p>
Concern that some 4x4 vehicles are classified as N1 and some (new vehicles) as M1 despite being similar / the same model. Therefore, the scheme will charge some vehicles which are less polluting (M1) and exempt others which are older and more polluting (N1).	Noted.
How long will the charge to HGVs will apply for?	Any decision to remove the scheme will be based on analysis of traffic flow and air quality changes.

Comment / issue / question raised	Response/ how addressed
Timings of the charge	
<p>The charge should not apply for 24 hours as it should allow residents to move trucks or vans in the evening or at weekends. Suggested timings:</p> <ul style="list-style-type: none"> Only apply during working hours; On Fridays and Saturdays only; and Between 2am and 2am to assist taxi drivers / shift workers 	<p>The principle of a peak hour / daytime / rolling CAZ has been previously considered:</p> <ul style="list-style-type: none"> A peak hour only scheme may not be sufficient to encourage the necessary behaviour change or may lead to unfavourable behaviour change that is not complimentary to the critical success factors of the project. For example, this would be likely to lead to trips being undertaken during unsociable hours. There was particular concern regarding increases in HGVs making deliveries or passing through the zone during the night. These options would add an enhanced level of complexity to the practical and enforcement aspects of the scheme and make the format of the charging zone more difficult to communicate and understand.
<p>Concern that previously it had been discussed with coach operators that the charge period could be from 0300 to 0259. Have the timings changed?</p>	<p>This option was discussed at a workshop with coach operators but was subsequently ruled out due to practicalities around implementing this in practice (this option would span over two calendar days and proved difficult to communicate).</p>
<p>Ensure the charges operate all the time to prevent HGVs traveling through in the early morning.</p>	<p>Charges will be operational 24 hours a day, 7 days a week</p>
The charge should apply to additional vehicles	
<p>A CAZ D / including private vehicles / old diesel cars would be preferable because:</p> <ul style="list-style-type: none"> Cars are the most polluting vehicles; and It will ensure behaviour is changed. <p>It is unfair that that charge applies to private vans and not private cars.</p>	<p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy. A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to these groups.</p>
<p>SUVs and other large diesel vehicles should be charged.</p>	<p>Under a Class C CAZ, the Council is required to exempt certain groups of vehicles in accordance with the national guidance, including Euro 6 or newer diesel cars and Euro 4 or newer petrol cars.</p>
<p>Boats should be included in the charge as they are large engine and run on diesel.</p>	<p>A CAZ is designed to tackle emissions from road traffic and follows guidance from central government. This is outside the scope of this scheme.</p>
Level of charge	
<p>Charges should be based on vehicle emissions multiplied by vehicle length.</p>	<p>The CAZ Framework sets out the minimum classes and standards for Clean Air Zones. These are defined by Euro Categories and standards to enable a consistent and clear system for determining whether a vehicle is compliant or not. The proposed CAZ follows this framework. Various charging levels were examined and tested via the traffic and air quality models and £9 was shown to be the lowest charge which would bring air quality to within legal limits by 2021 at the latest. Further details are set out in document FBC 11 – AQ3 Air Quality Modelling Report. Raising the charge above this limit would not be</p>
<p>To achieve results, the charge should be higher. Suggestion noted that the £9 category should be higher and the charges for HGVs and coaches should be higher.</p>	
<p>LGV and HGV are classified as the same in the UK, as such why are the charges different for each?</p>	
<p>Concern about the level of charge for HGVs being too high. If they enter multiple cities with clean air zones, they will face high levels of charge.</p>	

Comment / issue / question raised	Response/ how addressed
Concern about the blanket charge for coaches which will mean that a 19-seater coach will attract the same charge as a 70-seater coach and prices for people travelling in on smaller coaches will increase drastically as a result.	necessary to achieve compliance and would increase the likelihood of adverse impacts in terms of affordability or wider economic impacts. HGVs and coaches are already subject to a significantly higher charge than smaller vehicles (taxis and LGVs). Raising this further would penalise these vehicles unnecessarily.
Enforcement	
How will cross-border taxi and private hire charges work as DVLA doesn't have a record which distinguishes between private hire vehicles and taxis.	There will be a national taxi and PHV centralised database which would be utilised alongside a local database.
How will foreign number plates be charged?	The Council is working with central government to consider how cross-border enforcement will be carried out.
Payment	
It is not clear how people who do not have access to the internet will be able to pay. Will non-electric payments be available?	Payments are currently proposed online and over the phone. Further details about how to pay will be published well ahead of the commencement date.
How will the payment be made? Information about the payment is not clear in information provided.	
Why are payments restricted for up to 7 days in advance? People should be able to pay in advance with no time restrictions.	Payment timescales are set in accordance with central government requirements.
The payment period should be extended to a week after passing through the zone before the fine is applied.	A proposal to extend the retrospective payment window to 7 days (including the day of zone entry) is currently under consideration.

11. Further comments

11.1 Context

Question 9 gave respondents an opportunity to provide any **further comments** on the scheme's details as summarised in the consultation leaflet. Question 9 were asked via an open text box (limited to 10000 characters) to provide their further comments. In various other places within the questionnaire respondents commented on 'other' issues that were not directly related to the question posed. For the purpose of this analysis these comments are reported in this chapter alongside the other responses to question 9.

11.2 Overview of responses

Of the 597 questionnaires returned, 262 respondents commented on question 9 as shown in Table 11.1. Letters and emails also contained a variety of other comments.

Within this chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

In the other comments provided respondents expressed a general consensus in support of any scheme that tackles air quality, but some feeling that **more should be done** to combat emissions in Bath. A range of suggestions for alternative ways to tackle air quality (in preference to, or instead of a CAZ) were also put forward.

Further detail on these comments can be found in sections 11.2.1 to 11.2.5.

11.2.1 Comments that more action is needed to tackle air quality

Respondents provided comments that suggested that more action is needed to tackle air quality within Bath. Respondents suggested that more needed to be done because:

- There is currently a climate emergency; and
- Health is more important than convenience.

Respondents provided suggestions to 'do more', which included:

- Implementing the scheme before the 2020 deadline,
- Tackling other forms of emissions such as particulates and CO₂,
- A long-term goal to be carbon neutral by a certain date (i.e. 2040),
- Treating the scheme as a first step, not a solution, with tougher action implemented if monitoring shows no improvement to air quality; and
- Working to facilitate behavioural change rather than implementing charges and/or restrictions.

11.2.2 Comments providing alternatives to the Class C CAZ

Respondents provided comments on alternatives that could be implemented instead of a Class C CAZ to improve air quality within Bath. This included reference to the previous Class D CAZ proposal as an option which some respondents felt was needed, particularly in response to the recently declared 'climate emergency'. Whilst the majority of respondents suggested that these alternatives should be implemented instead of the CAZ it was noted by respondents that some of these alternatives could be used in conjunction with the CAZ to improve air quality within the city of Bath.

Generally, improvements to public transport and walking/cycling infrastructure, along with suggestions to construct a by-pass were the main alternatives presented. Respondents felt that with improvements to public transport and walking/cycling infrastructure there would be more of a modal shift away from car use. It was also suggested that improvements to these key areas would be needed before any type of CAZ scheme was introduced. Respondents also generally felt that the construction of a by-pass around the city would 'solve' many of the contributing factors associated with the air quality problem within Bath. It was felt that a by-pass would remove much of the traffic (private and commercial) from the city centre as much of the traffic is mainly passing through.

Further detail on comments providing alternatives to the Class C CAZ are provided in Table 11-1.

Table 11-1: Comments on alternatives to the Class C CAZ

Comment / issue / question raised	Response/ how addressed
Class D CAZ as an alternative	
As reported in chapter 4, some respondents preferred the previously proposed Class D CAZ with modifications and enhancements.	Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of a Class D CAZ on lower income households and the economy. A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to these groups.
Comments on Sustainable Modes of Travel	
Comments on Public Transport	
Respondents suggested that key improvements are needed on public transport, including: <ul style="list-style-type: none"> Cheaper fares like other major cities with subsidies for local residents Improved frequency Improved reliability (including maps of routes) Improvements to make public transport greener or emission free Electrification of bus fleets and/or trains Reviewing the bus system to ensure that it take into account travel patterns (students leaving the city in the morning and commuters entering the city). 	At present, bus services in Bath are operated by commercial companies which are responsible for setting their own fares and routes. The Council is working closely with transport operators to ensure all key routes are served and that their impact to air quality is reduced.
Respondents provided suggestions for new railway stations in key locations such as: <ul style="list-style-type: none"> Corsham Box Bathampton or Bathford Saltford 	The Clean Air Plan is focused on reducing pollution from road traffic. Train operation is regulated at a national level and is therefore outside the scope of this scheme. B&NES support rail improvements as train travel is an effective way to transport large numbers of people. The Council will pass on these comments to the relevant rail operators.
Respondents gave suggestions of implementation of trams within the city, with an electrified tram line between Bath and Bristol	The Council is constrained by timescales. Compliance with legal limits must be met by 2021 at the latest, therefore large infrastructure projects, cannot be delivered within the timescales for this scheme.
Comments on Walking Infrastructure	
Respondents stated that improvements to walking infrastructure is needed including suggestions that:	Any surplus revenue will be used to fund pedestrian and facility improvements where possible. As part of this Clean Air Plan, the

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> Streets should be redesigned to favour pedestrians The City centre should be fully pedestrianised Provide incentives to promote walking within the city 	<p>Council has launched a campaign to raise awareness of air pollution and alternative ways to travel.</p> <p>Improvements to walking infrastructure will be further considered as part of the wider transport strategy for Bath.</p>
Comments on Cycling Infrastructure	
<p>Respondents provided comments suggesting upgrades to key cycling infrastructure such as:</p> <ul style="list-style-type: none"> Wider or segregated cycle lanes More cycle parking (with minimum requirements of spaces for new developments) Cyclists to have priority on crossings Cycling infrastructure to be large enough to accommodate the use of cargo bikes Turning two-way roads into one-ways roads and using the other lane as a dedicated cycle way 	<p>Any surplus revenue will be used to fund cycling infrastructure improvements where possible. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel.</p> <p>Improvements to cycling infrastructure will be further considered as part of the wider transport strategy for Bath.</p>
<p>Respondents stated that encouragement to 'take up' cycling is needed with suggestions to:</p> <ul style="list-style-type: none"> Consult with key cycling organisations on how to encourage the uptake of cycling within the city Subsidise the purchase of electric bikes 	<p>Promotion of cycling will be further considered as part of the wider transport strategy for Bath. We will continue to engage with cycling groups as appropriate.</p> <p>The Council is requesting funding for the purchase of electric cargo bikes to facilitate last-mile delivery services.</p>
Comments on Traffic Management	
<p>Respondents suggested that the Council build a link road between:</p> <ul style="list-style-type: none"> The A36 & A46 Batheaston and Shepton Mallet Respondents noted that if there was insufficient money to implement a by-pass then it should be made a toll road to pay for itself 	<p>Compliance with legal limits must be met by 2021 at the latest. Any large infrastructure projects cannot be delivered within the timescales of this scheme. Providing additional road space is unlikely to solve city-wide air quality problems.</p> <p>The Council continues to explore innovative sustainable transport options in Bath to address future demand for travel and to facilitate further mode shift from cars for travel into the city. This could include a network of small car and bike parks on existing bus routes to the east of Bath.</p>
<p>Suggest enforcement of restrictions on idling vehicles. Respondents showed concern about the impact on noise and air pollution as a result of idling vehicles outside residential properties, businesses and schools, particularly from school traffic, buses and lorries.</p>	<p>Anti-idling enforcement is included in the bid for funding from the Clean Air Fund.</p>

Comment / issue / question raised	Response/ how addressed
<p>Suggestions to implement non-charging measures that effectively target pollution 'hot spots' (as implemented in Southampton) such as:</p> <ul style="list-style-type: none"> • Improvements to traffic flows (traffic light sequencing, improved junction layouts); • Traffic calming measures within the city, such as along Cavendish Road; • Encouraging driving improvements (anti-idling, smooth gear changes and breaking); • Encouraging HGV operations outside of normal business hours (nigh time deliveries etc); and • Implementation of chicanes. 	<p>These suggestions are not deliverable in this scheme's timescales and tackle smaller, more localised issues. Therefore, they would be unlikely to create and sustain the widespread improvement to air quality required.</p> <p>Traffic management measures alone would not improve air quality in Bath by a sufficient amount to enable compliance with legal limits in the shortest time possible.</p>
<p>Respondents suggested other improvements to traffic management such as:</p> <ul style="list-style-type: none"> • Improvement to traffic lights, including use of intelligence systems to help manage traffic flow; and • Implementation/review of traffic calming measures such as lower speed limits, speed cameras and speed bumps, particularly near Cavendish Road; Edward Street Lower Weston; Grove Street; Henrietta Road/Street; Julian Road; Marlborough Road/Cavendish junction; St John's Road; The Sydney Buildings; Warminster Road; Weston Road 	<p>These measures alone would not improve air quality in Bath by a sufficient amount to enable compliance with legal limits in the shortest time possible.</p> <p>The Council already operates a SCOOT system (Split Cycle Offset Optimisation Technique) for traffic signals which involves monitoring in the ground to enable the signals to automatically adjust to the traffic conditions. It is proposed that this system is reviewed as part of the CAZ implementation to ensure that the road network functions as efficiently as possible with the scheme in place.</p> <p>Traffic management/calming suggestions may not be deliverable in this scheme's timescales and tackle smaller more localised issues. Therefore, they would be unlikely to create and sustain the widespread improvement to air quality required.</p> <p>The impacts of the CAZ and Queen Square traffic management scheme will be monitored throughout the city, and corrective action will be considered if necessary. This may include measures such as further traffic management or calming.</p>
<p>Respondents made reference to bus lanes with suggestions to:</p> <ul style="list-style-type: none"> • Monitor the effect bus lanes have on the traffic within the city, with their subsequent removal if they are found to hinder traffic flow; and • Construct new bus lanes to improve traffic flows. 	<p>The Council recognises there is public concern over congestion. Providing additional road space is unlikely to solve city-wide air quality problems. These suggestions tackle smaller more localised issues. Therefore, they would be unlikely to create and sustain the widespread improvement to air quality required.</p>
Reference to Improvements to park and ride facilities within the city	
<p>Respondents outlined the need for a park and ride on the eastern side of Bath.</p> <p>Some respondents suggested that mini commuter park and ride sites should be established so that commuters also have this option rather than having to drive into the city</p>	<p>The Council continues to explore innovative sustainable transport options in Bath to address future demand for travel and to facilitate further mode shift from cars for travel into the city. This could include a network of small car and bike parks on existing bus routes to the east of Bath.</p>
<p>Respondents suggested the need for improvements to park and ride facilities such as:</p> <ul style="list-style-type: none"> • Improvements to luggage capacity on park and ride buses; • Cheaper parking/bus rates to encourage use; 	<p>The Council recognises that improvements to the park and ride facilities in Bath is a concern and will look to address this as part of the wider transport strategy for Bath.</p>

Comment / issue / question raised	Response/ how addressed
<ul style="list-style-type: none"> Improvements and more capacity for electric charging facilities; Free park and ride buses; and Encouraging tourists to use park and ride or provide shuttle buses. 	
Reference to reducing the number of cars or reducing car journeys	
<p>Respondents highlighted a need to tackle the volume of traffic within the city. It was noted that parked cars, narrow streets and excess pedestrian crossings cause many delays and congestion in Bath. Suggestions included:</p> <ul style="list-style-type: none"> Introduce a Congestion Charge, like London Promotion more sustainable modes (i.e. public transport) to get people out of cars Implement a Class D CAZ Require all drivers to be using cleaner vehicles and limiting their time in the zone. 	<p>Reducing congestion is not the main objective of this Clean Air Plan. It is possible that in some areas congestion may improve as a secondary benefit of CAZ implementation. The Council recognises that congestion is a concern in Bath and this issue is covered by the wider transport strategies of the Council.</p> <p>Consultation on a Class D CAZ in 2018 showed that many people had strong concerns about the disproportionate impact of charging cars on lower income households and the economy. A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact to these groups.</p>
Reference to parking	
<p>Respondents made suggestions to restrict and reduce parking within the city via the following methods:</p> <ul style="list-style-type: none"> Reduce long term parking spaces; Stop 'unofficial parking' such as at Bathwick Church; Do not provide new parking under the Rec Stadium; Introduce a workplace parking levy (as in Nottingham); New parking should have substantial electric charging capacity; Increase parking charges to subsidise public transport; Prevent new parking spaces in new developments; Remove all city parking with exceptions for the disabled; Change residential parking permits to charges based on CO₂ emissions and vehicle length; Implement a sustainable transit levy on all parking within the city, where money generated could be used to improve public transport; and <p>Respondents highlighted that parking within the city already puts people off driving in (and therefore affects businesses) so any further changes to parking will likely lead to a reduction in visitor numbers and the potential failure of businesses in Bath.</p>	<p>The Council is already offering residents driving ultra-low emission vehicles (ULEV) a parking permit discount. This will encourage the uptake of ULEV within the CAZ.</p> <p>Amending the parking policy for future developments will not change the level of air pollution that Bath now experiences.</p> <p>Parking is reviewed under the B&NES Parking Strategy and is outside the remit of this scheme.</p>

Respondents commented on other possible measures to improve air quality including suggestions to:

- Implement a Transport Policy/Strategy which could be monitored and evaluated;
- Make changes to current road layouts;
- Focus on the river to tackle pollution, suggest a 'park & float' scheme;
- Implement a collective taxi scheme which transports several passengers that have similar destinations to ensure maximum efficiency;

- Tackle HGVs within the city via a complete ban or weight restrictions (as implemented in other world heritage cities such as Florence);
- Implement Low Traffic Neighbourhoods;
- Implement traffic free measures:
 - Closing the City centre to motorised traffic during peak times with certain exemptions, e.g. for deliveries/key services; emergency vehicles, buses and taxis;
 - Introduce car free days and dedicated permanent car free roads within the city;
 - Pedestrianise more of the city;
- Plant trees and hedges;
- Encourage vehicles to by-pass Bath if not needing to enter the city;
- Pressurise manufacturers to phase out of the manufacturing and use of combustion engines, especially diesel engines, develop new technology to produce 'clean air' vehicles and make engine filters readily available;
- Encourage the switch to the use of electric vehicles by:
 - Only allowing electric vehicles within the city;
 - Increasing charging infrastructure throughout the city;
 - Providing incentives to own an electric vehicle;
 - Introducing a grandfather scheme - only applying the scheme to new vehicles which are bought after the implementation (rather than vehicles which are already owned / operated). This would ensure new vehicles are cleaner without impacting the existing fleets;
- Tackle school traffic via:
 - Reinstating local catchments so parents/children can walk to school;
 - Schools banning 6th formers from bringing their cars to school;
 - Improvements to school transport including, school buses, walking buses and cycling incentives;
 - Incentives to encourage students/parents to find more sustainable methods to get to school;
- Limit delivery vehicle size and restrict delivery times;
- Implement a Class B CAZ;
- Work with employers to work out methods that would encourage people away from using their private vehicles for commuting;
- Encourage a shift away from private vehicles, methods to encourage this included:
 - Reduce parking in the city centre;
 - Relook at park and ride;
 - Provide regular affordable public transport;
- Limit traffic within the city to only those who pay council tax;
- Using only light-coloured materials to surface roads;
- Stopping the infill of green spaces within the city;
- Only clearing pavements during times of snow to discourage people from using their cars;
- Charge tourists who visit the city a small fee which could be used to update public transport as undertaken in other major European cities such as Venice;

- Consult with residents/schools/employers on ways to reduce car use;
- Ensure that more students live on campus; and
- Promote deliveries via train instead of via road.

Implementation of a CAZ is based on Government guidance. Legally, compliance must be achieved in the shortest possible time which rules out many scheme alternatives. Any large infrastructure scheme cannot be delivered within the timescales of this scheme. No scheme can be implemented without due consideration of potential impacts and detailed planning of deliverability. Consideration of these factors by central Government and local modelling work has determined that a CAZ is the quickest way to achieve compliance with legal limits in Bath.

11.2.3 Comments on scheme design

Respondents provided comments on the scheme design and overall implementation of the CAZ., these are summarised in Table 11-2.

Table 11-2: Comments on scheme design

Comment / issue / question raised	Response/ how addressed
Scheme design	
Requests for further information on how the success of the scheme would be measured and adjusted to ensure compliance is achieved. Respondents showed concern that the scheme might not achieve compliance and that the Council is at risk of not achieving compliance without a Class D CAZ. Respondents also asked if the boundary could be amended if it is shown that emissions increase in other areas post scheme implementation.	See FBC-26 Evaluation, Monitoring and Benefits Realisation Plan in Appendix R of the FBC' for full details of the proposed monitoring as part of this scheme. This includes a corrective action plan to be followed in the event that the CAZ is not having the predicted impact.
Respondents raised concerns that those who are unfamiliar with Bath will avoid the zone if it is not clearly communicated which vehicles will be charged, there was concern there would be an assumption that charges mimic those in London.	It is understood that there will be a national communications campaign to raise awareness of Clean Air Zones and inform the public that schemes vary across the country. The Council will continue to undertake a comprehensive approach to communications both pre and post CAZ implementation.
Concerns that the modelling undertaken hasn't taken into account any new developments within the city and should be remodelled to include these	The baseline model (2021) has the most recent scheme assumptions for the assessment year modelled within it based on the Near Certain and More than Likely entries in the Uncertainty Log. Refer to FBC-13 T3 Local Plan Transport Modelling Methodology Report for further information. New developments being brought forward following completion of the FBC will need to be considered on a case-by-case basis in accordance with local planning processes, with due consideration given to their potential impact on air quality if appropriate.
When will the legal requirement for air quality will be reached across the city?	The Council is working towards achieving compliance in the shortest possible time, as directed. This would be by 2021 at the latest.
What NO ₂ data is held? And where can this information can be found?	Data on air quality in B&NES can be found in the Annual Status Reports which are published on the Council's webpages
Concerns for small traders within the city and whether a study had been done on how the CAZ would affect small traders to ensure that they were not disproportionately affected by the	The impacts of the scheme on local socio-economic groups, including SMEs (small and medium enterprises), are assessed in FBC-19 'Distributional and Equalities Impact Analysis Report' in

implementation of the CAZ as part of the decision-making process.	Appendix G of the FBC, which also identifies particular distributional and equality issues. As a result of this assessment, a package of targeted mitigation measures has been developed for businesses, including financial support and alternative delivery and servicing options, for which funding is being requested from central government.
Why is the modelling data not publicly available?	Modelling reports are published as part of the FBC and have been published at each stage of the business case development. These are available on the Breathe webpages.
There should be a feature on the website to input your vehicle registration to see what vehicles are exempt	Central government is developing a vehicle checker, and this should be available in early 2020.

11.2.4 Comments on the consultation process and supporting documents

Respondents provided queries, concerns and general comments on the consultation process, additional information included within the consultation leaflets and gave suggestions about the consultation and scheme going forward. Respondents showed support for and celebrated the consultation process undertaken to date. Others detailed concerns or suggested improvements. Comments included:

- Concern about the interpretation of consultations and the value given to responses, especially when considering the response rate or that those with negative comments might fill in multiple questionnaires but those that are supportive might not fill in any at all.
- Concern that some respondents lack an understanding of the proposals.
- Concern that the questionnaire was difficult to complete for those without digital access or proficiency. Suggestions to improve the presentation and collection of information via the questionnaire.
- Respondents suggested improvements and edits to the consultation leaflet including clearer presentation of information, maps and figures. More detail on the work undertaken to analyse the rerouting of non-compliant traffic around the CAZ and how drivers would pay the charge was requested.

The Council will continue to engage with the public throughout the implementation of the scheme. It will be possible to comment on boundary infrastructure as more information is made available. The Council will continue to have conversations with all key stakeholders as appropriate during this next stage of the scheme.

11.2.5 Other comments

Respondents provided other **comments** on the scheme. These comments included:

- Respondents provided suggestions/requests for the Council when moving forward with the scheme, including:
 - Open an online forum
 - Invite comment on the boundary infrastructure once there is a map of exact locations and provide an online map of the boundary that allows people to zoom to individual roads
 - Continue engagement with key stakeholders
 - Keep residents up to date. It was noted that some residents did not know that a CAZ was being implemented until receiving the postcard
- Concern that electric vehicles are not the answer as many cannot afford them but will not receive any government funding;
- General comments on:

- How 'dirty' air affects a specific individual
- Planning to avoid Bath in the future
- Residential roads not being built for large volumes of commercial and private vehicles
- Suggestions that if Bath is to thrive as a city (with the existence of businesses and a Christmas market) then traffic must be allowed within the city

DRAFT

12. Feedback from organisations and businesses

12.1 Context

During the consultation, businesses and organisations responded with feedback on the proposed scheme via the questionnaire, as well as by letters and emails. These comments have been summarised and reported in the corresponding topic sections above, alongside the data from the qualitative questions of the questionnaires. However, this section provides an overview of the responses received from businesses and organisations. Further details of the feedback/responses received (and the format in which the responses were received) have been summarised in Appendix C.

12.2 Overview of business respondents

The majority of business respondents stated they were either representing local businesses operating within Bath or national, regional and local transport and logistics firms. Many firms chose to remain anonymous, with some describing the type of business. Therefore, local businesses have been categorised into types of business, whereas in the transport and logistics section some of the business organisations have been named.

Table 12-1: List of businesses respondents

Type/name of business	Overview of comments
Local businesses operating within Bath	
<ul style="list-style-type: none"> Small businesses – retail Tradespeople (e.g. emergency gas/water/plumbing/heating) Services (i.e. dog walking, gardening services) 	<p>Concern over the cost of upgrading non-compliant vehicle(s) and unaffordability to the business. Queries as to financial support and timescales/availability.</p> <p>Concern over the daily charge and impact to their businesses.</p> <p>Concern over the impact on deliveries.</p> <p>Queries as to how weight restrictions and anti-idling will be enforced.</p> <p>Request for exemption/concessions or longer sunset period for businesses that operate within Bath and carry out work for Bath residents and businesses.</p> <p>Some support the CAZ but believe that the CAZ should also include private cars (i.e. Class D).</p> <p>Suggested alternatives – park and ride to the east of Bath, A36/A46 bypass</p> <p>When mentioned, concern over Queen Square proposals, in terms of impact on traffic and pollution.</p>
Transport and logistics	
<ul style="list-style-type: none"> Road Haulage Association (RHA) British Vehicle Rental and Leasing Association (BVRLA) Go South Coast United Parcel Service (UPS) Federation of British Historic Vehicle Clubs (FBHVC) Local coach operators Chauffeur and airport transfer services Motorcycle repairs and recovery 	<p>Generally supportive of tackling pollution but balanced against the impact on the local economy.</p> <p>Concerns over timescales for implementation and the impact on vehicle fleets, in terms of viability to businesses.</p> <p>Queries over the certainty and timescales for fleet replacement programmes or incentives/financial support for upgrading vehicles.</p> <p>Some businesses see the removal of proposals to charge cars as unfair.</p> <p>Queries over the hours of operation of the CAZ.</p> <p>Preference for a two-stage CAZ like in London (LEZ/ULEZ).</p> <p>Queries as to the ability to pay for one Clean Air Zone charge a day or whether this will be a capped charge (nationally), as some companies with non-</p>

Type/name of business	Overview of comments
	<p>compliant vehicles, will be operating between cities/areas with different CAZ within a 24-hour period.</p> <p>Support for non-charging measures, but sceptical as to success of some e.g. LGV parking at park and ride sites.</p> <p>Requests for the signage to be easy-to-understand at located at the height of HGV drivers sitting in their cabs.</p> <p>Request for consideration of further non-charging measures, i.e. centralised eco-hub, EV charging infrastructure.</p> <p>Support for the proposals including exemptions for historic vehicles, but concern over near-historic buses (due to licensing as PSVs).</p>

12.3 Overview of organisation respondents

The majority of respondents who stated they were representing an organisation, stated they were representing Residents Associations, Local, Parish or Town Councils or schools/other local organisations. Where two responses were received for the same organisation, i.e. from different members of a Residents Association, these have been amalgamated in the summaries outlined in Appendix C.

Table 12-2: List of organisation respondents

Type/name of organisation	Overview of comments
Residents Association	
<ul style="list-style-type: none"> Federation of Bath residents Associations (FoBRA) Sydney Buildings Householder Association Sydney Place Residents Association Lansdown Crescent Association Greenway Residents Association St James' Square Bath Limited St James' Square Association Cavendish Road Association Cavendish Crescent Association Cavendish Road Society Pulteney Estate Residents Association (PERA) Circus Area Residents Association (CARA) The Abbey Residents Association (TARA) 	<p>General support of the CAZ, with some residents' associations concerned, objecting or disappointed in the change from Class D CAZ to Class C CAZ. Reasons for this included:</p> <ul style="list-style-type: none"> Does not reduce pollution overall; Only focuses on hot spots/legal limits; Reduces the funds available to provide meaningful improvements to public transport and other measures to encourage behaviour change; and The CAZ should represent one component of a broader traffic management plan. <p>The majority were supportive of changes to the boundary, with requests for the inclusion of Sydney Buildings.</p> <p>Mixed responses to the Queen Square proposals, with the majority of residents' associations against the proposals due to the potential impacts on residential streets from the associated traffic flow changes resulting from the proposals.</p> <p>Those residents' associations who would be impacted have requested further schemes and mitigation to reduce the impact of traffic displacement, including low traffic neighbourhoods and associated traffic calming infrastructure, as well as closure of the Charlotte Street car park entrance/exit on to Marlborough Lane.</p> <p>Several residents' associations stated their support for anti-idling and weight restriction enforcement measures, and they were essential to support the CAZ.</p>

Type/name of organisation	Overview of comments
	<p>Supportive of reinvestment of funds to include more focus on public transport, walking and cycling, along with investment in park and ride and school transport.</p> <p>Need for robust monitoring and evaluation of performance of the scheme including air quality and displacement of traffic, within and outside the CAZ.</p> <p>Further charging and non-charging measures were also suggested, including:</p> <ul style="list-style-type: none"> • A workplace parking levy; • Alternative routes for HGVs (not the A36-A46); • Extending the park and ride sites and secure overnight parking; • Creation of low traffic neighbourhoods; • Rapid EV charging points at park and ride sites and new developments; • A weight restriction on Cleveland Bridge; and • Increase in parking charges in the city centre to deter drivers and subsidise public transport.
Local, Parish and Town Councils	
<ul style="list-style-type: none"> • Holt Parish Council • Bathampton Parish Council • High Littleton Parish Council • Monkton Farleigh Parish Council • Melksham Without Parish Council • Keynsham Town Council • Winsley Parish Council • Saltford Parish Council • Wiltshire Council – Holt & Staverton Division • Wiltshire Council – Winsley & Westwood Division 	<p>The majority of Parish and Town Councils stated their support for the principle of improving air quality.</p> <p>However, concerns have been outlined about the displacement of traffic and air quality issues to outside the city, into neighbouring parishes.</p> <p>Several Parish Councils were supportive of the change from Class D CAZ to Class C CAZ, mainly as it allows less affluent residents of Bath, Keynsham and the surrounds to access work and the RUH without incurring extra expenditure.</p> <p>Queries as to the overall costs of signage, camera placement and maintenance.</p> <p>Essential to retain public transport links (no reduction in services or increase in fares) from outlying areas into Bath, to maintain links to work, school and social opportunities.</p> <p>Consideration of a park and ride for the east of Bath.</p>
Schools and other local organisations	
<ul style="list-style-type: none"> • Midsomer Norton Scout Group • Bradford on Avon Streets Ahead • St Andrew's Church School • King Edwards School • KERB II Bradford on Avon Analysis Group • Midsomer Norton and Radstock CSVT • Bathampton Primary School safer routes to school group 	<p>Call for charities with minibuses and school buses to be exempt.</p> <p>Concern about the potential re-routing of traffic (especially HGVs) through Bradford on Avon and Bathampton, and the congestion and air quality impacts.</p> <p>Negative impact of air quality around schools.</p> <p>Welcome measures to reduce poor air quality.</p> <p>Concern that modelling undertaken for the CAZ has not been done to understand impact on overloading junctions in Bathampton.</p>
Elected Representatives	
<ul style="list-style-type: none"> • Cllr for Lansdown • Cllr for Moorlands • Cllr for Winsley and Westwood • Bath and North East Somerset Green Party 	<p>Concern over the impact of the Queen Square proposals and CAZ more generally on specific residential streets and locations within their constituencies.</p>

Type/name of organisation	Overview of comments
	<p>Traffic changes to be carefully monitored and if necessary, the implementation of traffic management measures (including low traffic neighbourhoods), measures to improve public transport, walking/cycling.</p> <p>Anti-idling should be rigorously enforced regardless of the CAZ. All roads should have weight restrictions, with higher weights only being allowed where there is a specific reason for doing so. The CAZ does nothing to stop the inappropriate traffic already on many Bath roads, such as large HGVs.</p>

13. Summary

13.1 Summary of feedback

The second formal public consultation on a CAZ for Bath, which sought views specifically on the proposed implementation of a Class C CAZ with traffic management measures, generated a wealth of feedback and information. This report has presented a summary of the comments received and has explained how each has been considered.

In summary:

- It is noted that whilst some respondents support the move to a Class C CAZ, others had comments/reservations about the Class C proposal, and some expressed the view that it did not go far enough. Some felt that a Class D CAZ would better address the recently declared 'climate emergency'. Comments on the Class C and Class D approaches have been reviewed. Overall, the Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time whilst minimising the impact on lower income households and the wider economy.
- Respondents generally appreciated the changes to the CAZ boundary that have been made since the first consultation. However, a wide range of further comments were made, many requesting the inclusion of additional streets within the zone, often to address perceived issues with rat running or parking. Requests have been assessed in terms of their practicality and overall need/effect. Whilst the reasons as to why residents wish to see additional boundary amendments is understood, the analysis undertaken to date has not identified any further technical need to alter the boundary to achieve compliance. In many cases, ongoing monitoring of the affected areas is recommended, and the Council will continue to engage with local communities..
- Similarly, suggestions for streets/areas that should be excluded from the CAZ boundary have been considered. In each case there is a strong technical reason for each of the referenced locations to be included within the zone and in many cases, excluding the areas mentioned would affect compliance, or would open up additional rat runs. For these reasons, no technical need to alter the boundary has been identified.
- Feedback on the proposals for temporary traffic management at Queen Square has been considered. Whilst some respondents supported the measures, or felt they did not go far enough, a number of respondents were concerned about traffic and air quality impacts on surrounding routes from the diversionary impact created by the scheme. Whilst these concerns were understood, the technical assessment found the diversionary impacts to be relatively minor, and therefore monitoring of these routes is recommended with allowance for funding to be made available, if necessary, for additional traffic management measures should conditions be more adverse than anticipated. The need to consider pedestrians and cyclists was also raised, and improved facilities have been included in the scheme.
- Overall respondents were keen to see boundary infrastructure (cameras and signs) positioned sensitively and these comments will be considered as the scheme is taken forward.
- In response to the draft charging order a range of comments were made in relation to charging periods and the level of the charge. The proposed charge was identified based on detailed analysis as the level most likely to achieve the required changes. In addition, a range of requests were made for additional concessions or exemptions. Overall the financial support package and concessions offered should address many of the comments and concerns raised.
- A wide range of suggestions for supporting measures were put forward. Many are outside of the scope of this study and will be considered by the Council as part of the wider transport strategy for Bath.
- Similarly, various suggestions were made for alternative approaches to tackling air quality. These have been considered, with reference to the overall scheme objectives and the Government direction. The

implementation of a CAZ is the only mechanism identified as able to achieve compliance in the shortest possible time.

13.2 Next steps

As noted above, B&NES is legally bound to take action to tackle air quality issues in the shortest possible time.

All decisions on the proposed Class C CAZ will be taken by local elected Members, via the B&NES Cabinet. Once a decision is made by the Cabinet, implementation of any measures will be dependent upon:

- JAQU's approval of the Full Business Case (effectively the document required to secure the funding to implement the scheme)
- Completion of any legal requirements.

If the scheme is approved for implementation it is intended that residents and businesses would receive regular updates on progress from the Council and officers will continue to welcome engagement.

Appendix A. – Consultation Questionnaire and Leaflet

DRAFT

Public consultation

Bath's Clean Air Zone

September/October 2019



Bath & North East
Somerset Council



BreATHe 
A Clean Air Zone for Bath

Foreword



In August of this year I was thrilled to march with and address 'Breathe in Bath', a gathering of local people demanding cleaner air in the city.

As Cabinet member for Climate Emergency and Neighbourhood Services, I am therefore pleased to be in a position where we can now launch this final consultation on Bath's Clean Air Zone (CAZ).

This will see charges for all higher emission taxis, private hire vehicles, buses, coaches, vans and HGVs to drive in the zone. Based on the current evidence, private cars and motorbikes will not be charged.

To ensure the government's clean air deadlines are met (while exempting private cars), we also propose to temporarily reduce traffic flows into pollution hot spots at Queen Square and Gay Street until compliance is achieved. The consultation document sets this out and provides an opportunity for you to comment on the final details of the scheme.

Central government has mandated the council to reduce pollution in the city to within legal limits in the shortest possible time and by 2021 at the latest. Introducing a charging CAZ has proved to be the only way we can do that.

I'd like to stress that the CAZ is only the start of our work to tackle air pollution. Our ambition is to turn Bath into an exemplar of sustainable transport and travel in a heritage setting, by providing better facilities for walking, cycling and public transport. This will allow us to tackle carbon emissions and congestion, as well as air pollution, across the whole of Bath & North East Somerset.

I am committed to using every tool at our disposal to achieve this goal, and all money raised from the zone will go towards more sustainable travel and transport for all.

Yours sincerely,

Sarah Warren

Cabinet member for Climate Emergency and Neighbourhood Services



Bath's Clean Air Zone

In March 2019, the council approved the introduction of a class C charging clean air zone (CAZ) for Bath that will charge most higher emission vehicles – except private cars and motorbikes – to drive in the city centre from the end of 2020. This is to urgently reduce harmful levels of nitrogen dioxide (NO₂) pollution to within legal limits by 2021, as directed by the government.

This decision followed an extensive public consultation on a class D clean air zone that would have also charged higher emission private cars to drive in the zone.

Along with the charging zone, the scheme includes a proposal to temporarily reduce traffic flows through Queen Square (which is required for private cars to be exempt from charges), and a range of financial and practical support to reduce the impact of the zone on the local economy and encourage a shift to cleaner transport.

About this consultation

Residents and businesses are invited to look at the details of the clean air zone scheme as it's developed since we last consulted in autumn 2018. These include:

- Approval of a class C CAZ (exempting private cars from charges)
- A proposal to temporarily reduce traffic flows through Queen Square and Gay Street, prioritising walking and cycling and allowing private cars to be exempt
- Changes to the boundary to reflect residents' wishes and technical issues
- Details on the placement of street signage and cameras
- Refinement of the support packages for businesses and individuals affected by the zone
- How any revenue from the zone might be spent to support sustainable transport and travel policies.

Draft charging order

We're also giving you the opportunity to review the draft charging order. This is summarised in plain English in the following pages, but you can also read the full legal document online at bathnes.gov.uk/breathe, or in print at a consultation event or library. The charging order will form the legal basis for enforcing the zone and includes details on how it will operate, including the agreed charges, charging policies, exemptions and concessions.

How to take part

Should you have any questions or concerns, this is a good opportunity to talk to a team member at one of our consultation events or to submit feedback using an online or paper questionnaire.

For more information on how to take part, please turn to the back (page 17).

All comments will be given due consideration before we submit the final plan to central government for approval in December 2019.

This consultation closes at 23.59 hrs on 20 October 2019.

Why do we need a clean air zone?

The UK has legislation in place to ensure that certain air quality standards are met. The EU and national legal limit for nitrogen dioxide (NO₂) pollution – caused mainly by diesel and older petrol vehicles – is 40 µg/m³ (as an annual average).

A number of roadside locations in Bath exceed this limit, a situation that is unacceptable given the health impacts linked to NO₂ pollution:

- Exposure to high levels of NO₂ makes heart and lung conditions worse
- 12,000 people in B&NES suffer from asthma, and exposure to high levels of NO₂ can trigger attacks
- The latest research indicates that in the UK, between 1 in 4 and 1 in 12 new cases of asthma in children each year is attributable to NO₂
- High levels of NO₂ contribute to reduced lung development in children
- High levels of NO₂ are linked to the increased possibility of heart attacks and dementia in older people.



How did we decide on a class C CAZ?

In 2017, the government told us to reduce concentrations of NO₂ in the city to below legal thresholds in ‘the shortest possible time’ and by 2021 at the latest.

Our in-depth technical work (lasting over 18 months) showed that a charging clean air zone – a geographical area where a fee is levied to deter drivers of higher emission vehicles – is the only measure that will ensure compliance in the time frame.

Initial options

In Spring 2018, we asked the public for feedback on our strategic outline business case which included the following charging zone options (as outlined in the government’s Clean Air Zone Framework):

CAZ Class	Vehicle types charged
B	Higher emission buses, coaches, taxis, private hire vehicles and HGVs
C	As per B including higher emission vans and minibuses
D	As per C including higher emission private cars

Further technical modelling in the summer of 2018 revealed that a class B CAZ would not achieve compliance, and a class C CAZ would have left two NO₂ hot spots in the centre of Bath exceeding legal thresholds.

A class D CAZ was therefore seen as our best course of action to urgently reduce risks to health and to meet the government’s directive.

Public feedback

In autumn 2018, the proposal for a class D CAZ was the subject of an extensive public consultation receiving over 8,400 responses. There was a strong feeling that charging private cars would have a disproportionate impact on the economy and lower income households, and many of you asked us to

look again at whether it was possible to exempt cars while meeting the air quality targets set for us.

We listened, and the council’s cabinet agreed to delay its decision to allow for proper consideration of people’s feedback and for additional technical work. In March, the project team presented cabinet with two options: the original class D CAZ and a class C CAZ with a proposal to temporarily reduce traffic flow through Queen Square and Gay Street, enabling private cars to be exempt from charges. The cabinet approved the class C CAZ.

Public feedback during the consultation also helped to shape amendments to the zone boundary and to prioritise measures that would support those affected by the scheme.

You’ll find more information on how we reached the decision for a class C charging zone at bathnes.gov.uk/breathe. You’re also welcome to address any questions you might have to a team member at one of our consultation events.

Who is funding and reviewing this work?

To provide reassurance that our scheme will achieve compliance with EU and national legal limits for NO₂, all of our work is being independently verified by the government’s Joint Air Quality Unit (JAQU) and their team of independent experts. The government is also providing all of the funds to design and implement the scheme and to reduce the impact on those affected.

Next steps

We will agree the finer details of the scheme (taking into account feedback from this consultation), before submitting our final plan to the government in December. We expect a charging clean air zone to be in place by the end of 2020 and we will be monitoring and evaluating its effectiveness to ensure we achieve compliance.

The zone boundary

The approved zone includes the centre of Bath, but air quality will meet legal limits across the whole city. Please note that several changes have been made to the zone since we consulted the public in autumn 2018 – these are outlined below.

For detailed plans showing where the boundary comes into effect and proposed sign and camera placements, please come to one of our events or visit bathnes.gov.uk/zonemaps.

Boundary changes – March 2019

The boundary was amended in March to take account of feedback during the consultation last year:

- Inclusion of Pulteney Estates residents association area
- Exclusion of Cranhill Road and Rivers Road
- Inclusion of Oldfield Road/A367 junction area
- Inclusion of Bathwick Estates residents association area
- Inclusion of Sydney Gardens residents association area

It was also agreed to monitor the traffic flows in Bathampton to see if, as a result of the CAZ, any future traffic management measures would be required. For further details see the consultation response report online at bathnes.gov.uk/OBCdocs.

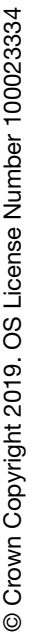
Latest boundary change – June 2019

We're proposing that the boundary is now extended from Sydney Road to the canal at Bathwick Hill, taking in the following streets:

- Sydney Wharf
- Raby Mews
- Sydney Mews
- Raby Place/Bathwick Hill (west of the canal)

This is to reduce the impact of signage and cameras on the amenity of the area and to align with the existing residents' parking zone (RPZ). This will prevent non-compliant vehicles (owned by residents and non-residents) from parking only in the area of the RPZ that would otherwise be left outside of the zone.





Charges in Bath's Clean Air Zone

In Bath's class C clean air zone, private cars and motorbikes will not be charged. However, most other vehicles will have to meet Bath's minimum emission standards to drive without charge in the zone at the end of 2020. The standards are in line with those set out in the government's Clean Air Zone Framework.

Bath's minimum emission standards

If your vehicle meets the following minimum emission standards for Bath, you'll be able to drive freely (**without charge**) in the zone:

- Euro 6/VI (or newer) diesel vehicles registered from c. 2015
- Euro 4/IV (or newer) petrol vehicles registered from c.2006
- Electric vehicles
- Hybrid vehicles
- Alternatively fuelled vehicles

This includes **modified or retrofitted** vehicles that can be shown to meet our minimum emission standards. However drivers of these vehicles may have to register with us next year to avoid an automatic charge (see pages 10 and 12).

Private cars and motorbikes are not charged in class C clean air zones regardless of their emission standards.

Charges for non-compliant vehicles

If your taxi, PHV, van, bus, coach or HGV does not meet Bath's minimum emission standards i.e. the vehicle is higher emission/non-compliant, you **will be charged** to drive in the zone. Non-compliant vehicles are:

- Pre euro 6/VI or equivalent diesel vehicles (older than c.2015)
- Pre euro 4/IV or equivalent petrol vehicles (older than c.2006)

Charges will apply midnight to midnight, every day of the year:

- **£100 per day** for non-compliant buses, coaches and HGVs
- **£9 per day** for non-compliant taxis, private hire vehicles, minibuses and LGVs/vans
- Exemptions and concessions apply (see pages 10-11)

Please see the chart opposite for more information on vehicle categories and charges.

How will I know if my vehicle is compliant?

The DVLA is developing an online vehicle checker that will tell you whether or not your vehicle is compliant in a particular zone, including Bath's CAZ. Meanwhile, we strongly recommend that you check your V5 log book or contact your vehicle's manufacturer to confirm its euro standard.

What is a euro standard?





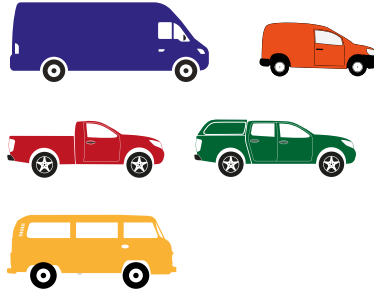

A euro standard (e.g. Euro 6/VI) represents the amount of pollution emitted by a vehicle's exhaust. A higher euro number indicates that the engine is newer and its emissions are cleaner. A lower euro number means the engine is older and more polluting. Diesels create more NO₂ than petrol vehicles.

Charges in Bath's Clean Air Zone

Charges only apply to non-compliant, higher emission taxis, PHVs, LGVs, vans, buses, coaches and HGVs. Private cars and motorbikes **will not be charged** in Bath's class C clean air zone, regardless of their emission standards.

How much you pay will depend on the vehicle's category (e.g. N1, M2), so please check your V5 log book (line J) or consult your vehicle's manufacturer.

Exemptions and concessions apply.

Vehicle category	Type of vehicle	Euro standard	Daily charge
M3	<ul style="list-style-type: none"> Buses Coaches 	Pre euro 6/VI diesel	£100
N2, N3	<ul style="list-style-type: none"> HGVs under 12 tonnes (N2) HGVs over 12 tonnes (N3) 	Pre euro 6/VI diesel	£100
M1	<ul style="list-style-type: none"> Taxi Private hire vehicles 	Pre euro 6 diesel Pre euro 4 petrol	£9
M2	<ul style="list-style-type: none"> Minibuses Minibus taxis/PHVs 	Pre euro 6 diesel Pre euro 4 petrol	£9
N1	<ul style="list-style-type: none"> Vans LGVs Pick-ups Dual purpose 4 x 4s (N1) Campervans (N1) 	Pre euro 6 diesel Pre euro 4 petrol	£9
N1/PHGV	<ul style="list-style-type: none"> Motorhomes classed N1 or PHGV Horse transporters N1 or PHGV 	Pre euro 6/VI diesel Pre euro 4/IV petrol	£9

Exemptions

Certain higher emission vehicles will be exempt from charges in Bath's clean air zone and in many other zones across England.

In many cases this should be an automatic exemption i.e. the automatic number plate recognition (ANPR) cameras will recognise your number plate as a vehicle that is nationally or locally exempt and you will not be charged.

Currently we're proposing that some vehicles will need to pre-register their vehicle with the council ahead of the zone's launch to avoid being charged. Details on registering for exemptions will be available next year.

Please note that national and local exemptions will vary.

Vehicle type/ tax class	Exemption type	Notes
Private cars & motorcycles	Automatic exemption in Bath's CAZ. Private cars and motorbikes may be charged in other clean air zones across the country.	Some 4 x 4 utility vehicles and car-derived pick-ups are considered dual purpose and will be registered as vans (N1) on your V5 log book. These vehicles are not exempt.
Private cars registered as PLG (18 years or older)	Pre-registration required in Bath's CAZ.	If your car is registered before March 2001 (18 years or older) and classed as PLG on your V5 log book you may need to pre-register it with the council to avoid being charged.
Modified or retrofitted vehicles that meet the scheme's minimum emission standards	Pre-registration required in Bath's CAZ.	If your vehicle has been modified or retrofitted to meet Bath's minimum emission standards you may need to pre-register it with the council to avoid being charged.
Historic vehicles	Automatic exemption in England.	Applies to all higher emission vehicles which are 'historic vehicles' for road tax purposes.
Agricultural and similar vehicles	Automatic exemption in Bath's CAZ.	Applies to all higher emission vehicles that are 'special concessionary vehicles' for road tax purposes.
Military vehicles	Automatic exemption in England.	Applies to military vehicles owned by Her Majesty's forces or in use for their purposes.
Vehicles for disabled people	Automatic exemption in England.	These vehicles are exempt from vehicle road tax and should include most community transport vehicles.
Emergency service vehicles	Automatic exemption in Bath's CAZ.	Applies to all higher emission vehicles that are 'emergency vehicles' for road tax purposes until 31 December 2024 when the fleet is expected to be compliant.
Health service vehicles	Automatic exemption in Bath's CAZ.	These vehicles are exempt from vehicle road tax.

Go to **bathnes.gov.uk/CAZexemptions** for more information or to submit a query.

Concessions

If you, or your vehicle, belong to any category below, you will not have to pay in Bath's CAZ until the concession expires. Currently we're proposing two types of concession, but this might change.

- **A registered concession** – whereby owners will need to pre-register their vehicle before travelling freely in the zone. In some cases

drivers will also need to register each day they enter the zone for fees to be waived.

- **An automatic concession** – where no action is required by the owner to drive freely in the zone until the concession expires.

Details on how to apply for concessions will be available early next year.

Registered concessions

Keeper/vehicle tax class	Expiry date	Notes
Euro 4 & 5 diesel vehicles with a valid community transport permit not otherwise exempt	Registered concession until 31 December 2022.	Owners/drivers will need to pre-register their vehicle and – in the same way as those paying the charge – register each day they enter the zone for fees to be waived.
Euro 4 & 5 diesel vehicles used by registered blue badge holders	Registered concession until 31 December 2022.	
Vehicles eligible under the terms of the financial assistance scheme	Registered concession until 31 December 2022.	
Euro 4 & 5 diesel vehicles used by registered healthcare providers for work purposes	Registered concession until 31 December 2022.	
Vehicles used by voluntary organisations in support of the emergency services	Registered concession until 31 December 2024.	

Automatic concessions

Keeper/vehicle tax class	Expiry date	Notes
Euro 4 & 5 diesel wheelchair accessible taxis and PHVs	Automatic concession until 31 December 2022.	Applies to taxis and PHVs registered as wheelchair accessible.
Recovery vehicles	Automatic concession until 31 December 2024.	Applies to all higher emission vehicles which are 'recovery vehicles' for road tax purposes.
Showman's vehicles	Automatic concession until 31 December 2024.	Applies to all higher emission vehicles which are 'showman's vehicles' for road tax purposes.
General haulage vehicles	Automatic concession until 31 December 2024.	Applies to all higher emission vehicles which are 'general haulage vehicles' for road tax purposes.
Special vehicles	Automatic concession until 31 December 2024.	Applies to all higher emission vehicles which are either 'special vehicles' or 'special type vehicles' for road tax purposes.

Go to bathnes.gov.uk/CAZconcessions for more information or to submit a query.

Charging and enforcement policy

Charges

- Charges only apply to higher emission vehicles that don't meet our minimum emission standards (see pages 8 to 9).
- Private cars and motorbikes will not be charged regardless of emission standards.
- If you drive a vehicle that does not meet our minimum standards, you'll need to pay a charge for each day that you drive in the zone.
 - £9 per day for higher emission taxis, private hire vehicles, minibuses, light goods vehicles (LGVs) and vans
 - £100 per day for higher emission buses, coaches and HGVs
 - Exemptions and concessions apply (see pages 10 and 11)
- Charges will not apply if your vehicle is parked in the zone but does not move.

Charging times (when the zone operates)

- Charges for higher emission vehicles will apply once in every 24-hour period (midnight to midnight), 7 days a week, 365 days a year when entering or driving in the zone.
- If you drive in the zone across two days, for example before midnight and after midnight, you'll need to pay two daily charges.

How long will the zone be in place?

For legal purposes, the draft charging order states the duration of the scheme as 'indefinite'. This is to allow for flexibility to operate the scheme until compliance is achieved.

How you'll pay

- Payment needs to be made before midnight of the following working day.
- Payment can also be made up to seven days in advance of your journey.
- You will be able to pay directly in a number of convenient ways. More details will be made available next year.

Enforcement process

Penalty charge notice for non-payment

- A penalty charge notice (PCN) of £120 will be due – in addition to the outstanding charge – for each day that you have driven in the zone and not paid before midnight of the following working day.
- This penalty charge must be paid within 28 days from the date the PCN was served. The outstanding daily charge must also be paid.
- If the PCN is paid within 14 days of the date of service of the PCN, the penalty charge will be reduced by 50% to £60.
- If you fail to pay the PCN within 28 days, the penalty charge will be increased by 50% to £180.

Failure to pay

- Should you fail to pay the penalty, you risk your vehicle being immobilised, with an additional penalty charge of £70 for its release (provided all other charges and penalties are paid).
- If this penalty is not paid, your vehicle could be removed, stored or disposed of. This could cost you an additional £200 for the vehicle's removal, £40 for each day or part of a day of which it is held in storage, and £70 for its disposal.

Registering vehicles for exemptions/concessions

The council will keep a database of vehicles that are either locally exempt or eligible for concessions (see pages 10 to 11).

If the exemption/concession is not automatic, you'll be required to apply to register your vehicle in advance. In some cases (see page 11), you will also need to register each day that you travel in the zone for the fee to be waived.

Failure to register your journey in the zone before midnight of the following working day could result in a penalty charge.

More information on how to apply to register for an exemption or a concession will be available well before the zone is launched.

Queen Square proposals

In the future, as part of wider plans for a car-free city centre, our goal is to restrict through-traffic along the south and east sides of historic Queen Square and this will be subject to a separate public consultation in due course.

In the meantime, we're proposing to reduce traffic flows through Queen Square and Gay Street. Without this measure, a class C CAZ (exempting private cars) would not be capable of reducing NO₂ to within legal limits in the timescale required.

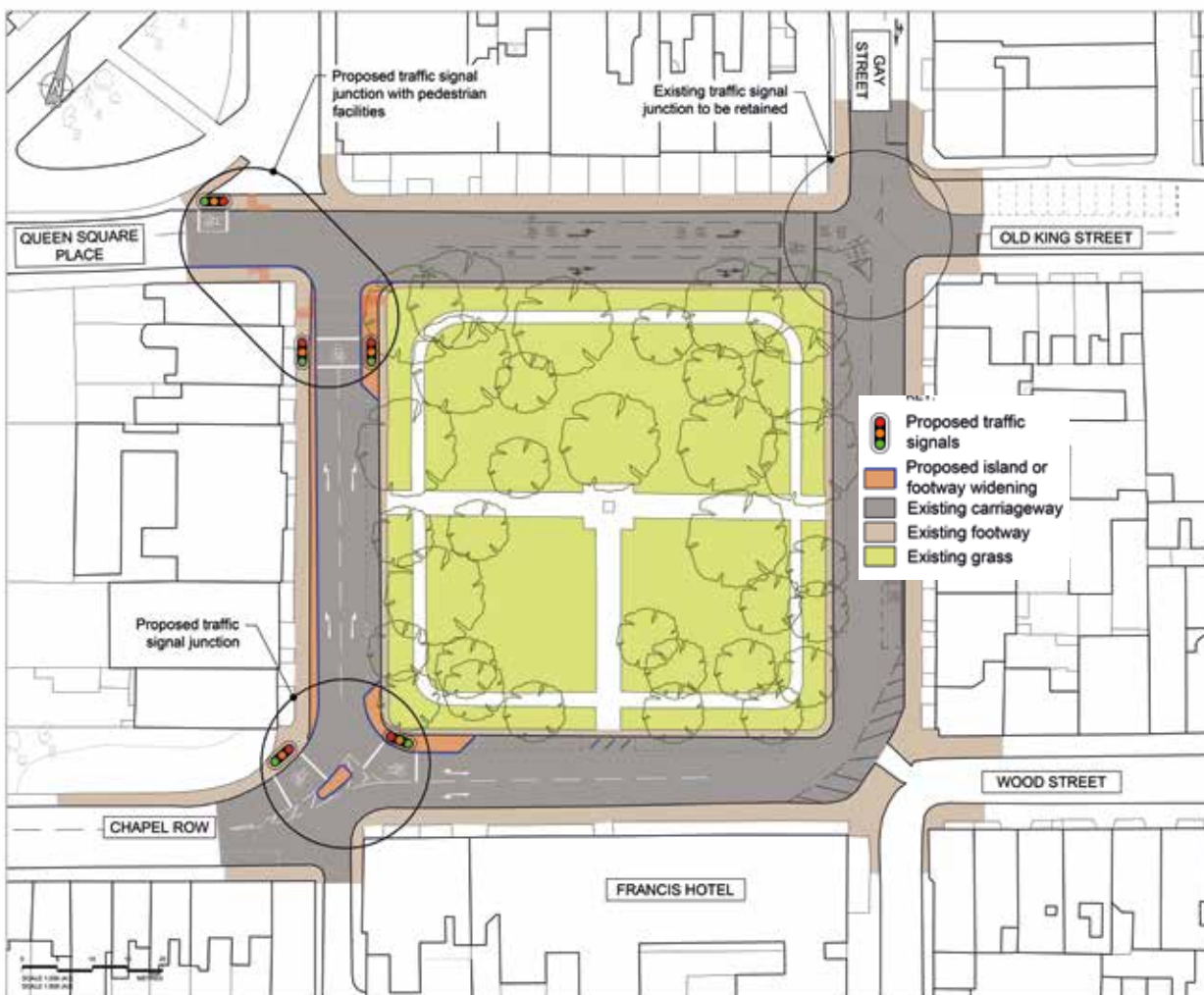
This is a temporary measure which will be removed once compliance is achieved.

New traffic lights will be placed at the junctions with the A367 Chapel Row/Princes Street and at Queen Square Place. We'll also seek to improve the space with better footways, priority for cyclists, and traffic light crossings.

This is predicted to divert some vehicles along Julian Road, Marlborough Buildings and Cavendish Road, and create a small increase in NO₂ levels at Whiteway Road, Rush Hill, and Lansdown Lane. However levels of NO₂ are not expected to exceed the legal threshold at these locations or in any other area of Bath.

Overall a class C CAZ ensures fewer negative impacts on a wide range of people (including disadvantaged groups) than a class D CAZ which would have charged drivers of all non-compliant cars.

For more information see the Distribution and Equalities Impact Analysis in the Outline Business Case at bathnes.gov.uk/OBCdocs.





Artist's impression of CAZ signs at a boundary

Signage and cameras

National clean air zone road signs will be used along all major routes into Bath's clean air zone. This includes signs in advance of entry, at the point of entry and at the point of exit.

The government has designed the signage so that there is national consistency across all charging clean air zones.

Concerned about work on your street?

We intend to start preparatory work on the zone in the autumn, including limited road works. In 2020, we'll start to install cameras and signage. If work is happening on your road, a community liaison officer will contact you to explain what's involved and to address any concerns.

Cameras

Automatic Number Plate Recognition (ANPR) cameras (mobile and fixed) will capture the details of all vehicles travelling into and within the zone. Fixed cameras will be placed at strategic points above the road, including at all boundaries.

Number plates are then checked against national databases to establish the vehicle's tax class, emissions rating and whether or not the vehicle is exempt. The registration will also be checked against the council's own list of vehicles that have been granted a local exemption or concession.

The cameras' range is restricted to ensure that only the vehicle's details are recorded, not surrounding areas or private property. For more information, please see our FAQs online.

For detailed plans showing where the boundary comes into effect and proposed camera and sign placements, please come to a consultation event or visit bathnes.gov.uk/zonemaps.

Support packages

Support funded by the government

We will be supporting those affected by the zone with a range of measures funded by central government to encourage the uptake of cleaner, more sustainable transport.

To date we've been successful in securing up to £10 million to invest in the following initiatives:

Initiative	Summary
Financial support to upgrade older buses	Grants will be provided to local bus companies to retrofit or repower older, non-compliant buses. This will improve air quality, protect existing bus services and discourage fare rises.
Financial support for those affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	Financial support will be available to businesses, charitable organisations and individuals in B&NES and neighbouring authorities to upgrade non-compliant taxis, PHVs, LGVs, vans, HGVs, buses and coaches. This will improve air quality and reduce the financial burden on the local economy. It could include: <ul style="list-style-type: none"> – Grants and/or interest-free finance for upgrading pre-euro 6 diesel and pre-euro 4 petrol vehicles – Grants and/or interest free finance to install electric charging points to further encourage the uptake of electric vehicles.
Travel advisors to work with residents and businesses	Advisors will be available to help residents and businesses to access the support on offer, as well as encouraging the switch to cleaner, more sustainable modes of travel and transport.
Anti-idling enforcement	To discourage drivers from running their engines while waiting.
Weight restriction enforcement	To discourage inappropriate rat running.

When the full business case is submitted to the government later in the year, we hope to secure additional funds for the following:

Initiative	Summary
Last mile delivery and servicing support for businesses within the CAZ	Support for businesses within the CAZ wanting to reduce their reliance on traditional road transport. This could include: <ul style="list-style-type: none"> – Support to develop specialist delivery and servicing plans – Expansion of the car and van club scheme – Provision of a shared electric cargo bike scheme – Provision of micro distribution hubs within the city.
Incentives for van drivers to use the park & ride (P&R) sites	Better security and a free concession for non-compliant van drivers using the P&R sites to further improve air quality and reduce the financial burden on the local economy.
Additional EV charging points for commercial vehicles	An additional 60 rapid charge points and 60 fast charge points in key locations around the city.

For more information on the financial assistance scheme, go to **bathnes.gov.uk/CAZsupport**.

Reinvesting revenue from the zone

In the future, any revenue from the scheme will be invested in initiatives that encourage a shift towards more sustainable transport and travel among all motorists – including car drivers.

In the first five years, the council does not expect to generate much – if any – net revenue over and above the costs of running the scheme. However, our intention is to form a steering group of councillors and representatives from business and other interest groups to help review and prioritise proposals.

Improvements could include:

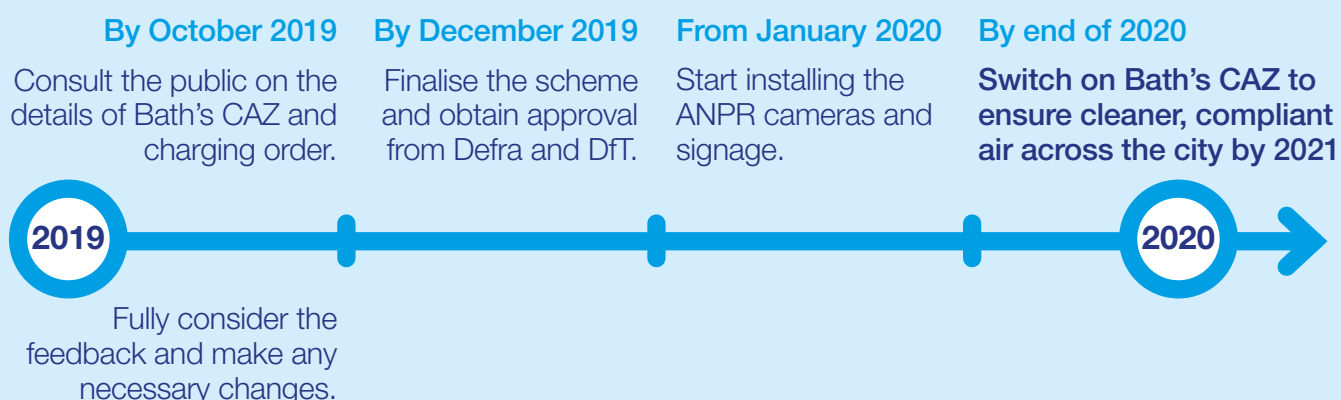
- Enhancing the supporting measures already being funded to help offset the impact of the CAZ on businesses (see page 15)
- Enhancing the monitoring and evaluation of the scheme and implementing contingency plans if required
- Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods

- Supporting walking, scooting and cycling to school initiatives and creating school streets
- Supporting and enhancing the public transport network, including home to school transport
- Providing additional park and ride capacity and security at the existing park and ride sites and on existing bus routes
- Providing schemes to reduce the impact of vehicles on the health and wellbeing of residents and visitors
- Supporting and enhancing other sharing schemes such as the electric cycle hire scheme
- Supporting the development of a mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel.

The proposed initiatives are outlined in full in Annexe 5 of the draft charging order, including priorities for the first five years.

We welcome your comments.

Next steps



How to take part

The aim of this consultation is to update you on our plans for a class C charging clean air zone in Bath. This includes key developments since we last consulted and also the details of the scheme as set out in the draft charging order. More information is available online and at our events.

Should you have any questions or concerns, please attend an event or submit feedback using the online or printed questionnaire.

How to review the draft charging order

The details of the draft charging order are summarised in this leaflet but you can read the full document either online at **bathnes.gov.uk/CAZconsultation** or in print at an event, library or one stop shop.

Events

For a list of consultation event dates and venues:

- Go to **bathnes.gov.uk/CAZevents**
- Or call customer services on **01225 39 40 41**

How to submit feedback

If you wish, you can leave feedback using our online or printed questionnaire:

- Go to **bathnes.gov.uk/CAZconsultation**
- Or visit a B&NES library or one stop shop to pick up a printed copy.

The consultation ends on 20 October 2019 at 23.59 hrs.

All comments will be given due consideration before we submit the final business case to central government for approval at the end of the year.

Keep up-to-date

- Subscribe to our newsletter online
- Follow us on Twitter and Facebook
-  **facebook.com/bathnes**
-  **twitter.com/bathnes**
- Use **#BathBreathes2021**



Public consultation

Bath's Clean Air Zone

September/October 2019

Consultation Questionnaire

Why are we consulting?

In March 2019, the council approved the introduction of a class C charging clean air zone (CAZ) for Bath that will charge most higher emission vehicles – except private cars and motorbikes – to drive in the city centre from the end of 2020. This is to urgently reduce harmful levels of nitrogen dioxide (NO₂) pollution to within legal limits by 2021, as directed by the government.

Along with the charging zone, the scheme includes proposals to temporarily reduce traffic flows through Queen Square and a range of financial and practical support for the businesses and individuals affected.

The decision to introduce a class C CAZ followed an extensive consultation on a proposed class D CAZ in autumn of last year. This would have charged all higher emission vehicles – including private cars – to drive in the zone.

This consultation is your opportunity to look at the final details of the scheme and review the draft charging order which will form the legal basis for enforcing the zone.

Key developments

Key developments to the scheme since we last consulted include:

- Approval of a class C CAZ exempting private cars.
- Changes to the zone's boundary to reflect residents' wishes and for technical reasons.

- Proposals to temporarily reduce traffic flows through Queen Square and into Gay Street (enabling private cars to be exempt from charges). Gay Street would otherwise still exceed NO₂ limits.
- Refinement of the support package which reflects central government funding requirements.

These developments are outlined in full in the accompanying consultation leaflet.

Draft charging order

The draft charging order will form the legal basis for enforcing the zone when it's launched and includes details on how the zone will operate. This is summarised in plain English in the consultation leaflet but is also available to read online at **bathnes.gov.uk/CAZconsultation** and in print at our libraries and events. It includes:

- Proposals for reinvesting any revenue from the zone
- The zone's boundary
- Agreed charges, charging policies, exemptions and concessions.

Continued overleaf



Who should take part?

We encourage the following groups in particular to take part:

- Businesses and individuals with non-compliant vehicles likely to be affected by charges in the zone, including those eligible for concessions or exemptions
- Residents living within or just outside the zone's revised boundary.

How to take part

The aim of this consultation is to update you on our plans for a charging clean air zone in Bath, summarised in the accompanying consultation leaflet. Details of how the zone will operate are also set out in the draft charging order.

Both of these documents are available to read online at **bathnes.gov.uk/CAZconsultation**. Paper copies are available at our events and at B&NES libraries and one stop shops.

Should you have any questions or concerns, this is a good opportunity to talk to a team member at one of our consultation events. You can also submit feedback using this printed questionnaire, or by completing the online version at **bathnes.gov.uk/CAZconsultation**.

The consultation closes on 20 October 2019 at 23.59 hrs.

Attend an event

For a list of consultation event dates and venues:

- Go to **bathnes.gov.uk/CAZevents**
- Or call customer services on 01225 39 40 41

How to return this questionnaire

Simply drop completed questionnaires into one of the marked boxes in any B&NES library or one stop shop by the closing date of 20 October 2019.

Alternatively you can post it to: CAZ Consultation, Public Protection, Lewis House, Manvers Street, Bath BA1 1JG.

Data protection

The responses to this consultation questionnaire are anonymous and no personal data will be taken.

Note

You do not need to answer every question in this survey to take part. Please skip to the sections that are relevant to you or on which you'd like to comment.

You can respond either on behalf of you/your family or on behalf of a group/business (but not as both).

The questionnaire

Section 1

Approval of a class C charging clean air zone (exempting cars)

In the accompanying consultation leaflet (page 5), we've outlined how we arrived at the decision to introduce a class C CAZ which exempts private cars from charges. This decision followed a consultation on a class D CAZ that would have charged all higher emission vehicles, including private cars, to drive in the zone.

1. If you would like to comment on the change from a class D to a class C charging clean air zone (removing private cars from charges), please use the space below.

☐ No comments. Please skip to Question 2.

Continued overleaf

Section 2

The zone boundary

In the accompanying consultation leaflet (pages 6-7), we explain the changes we made to the boundary in March 2019 to take account of residents' feedback, and the extensions we are now proposing for technical reasons. In summary, these changes are:

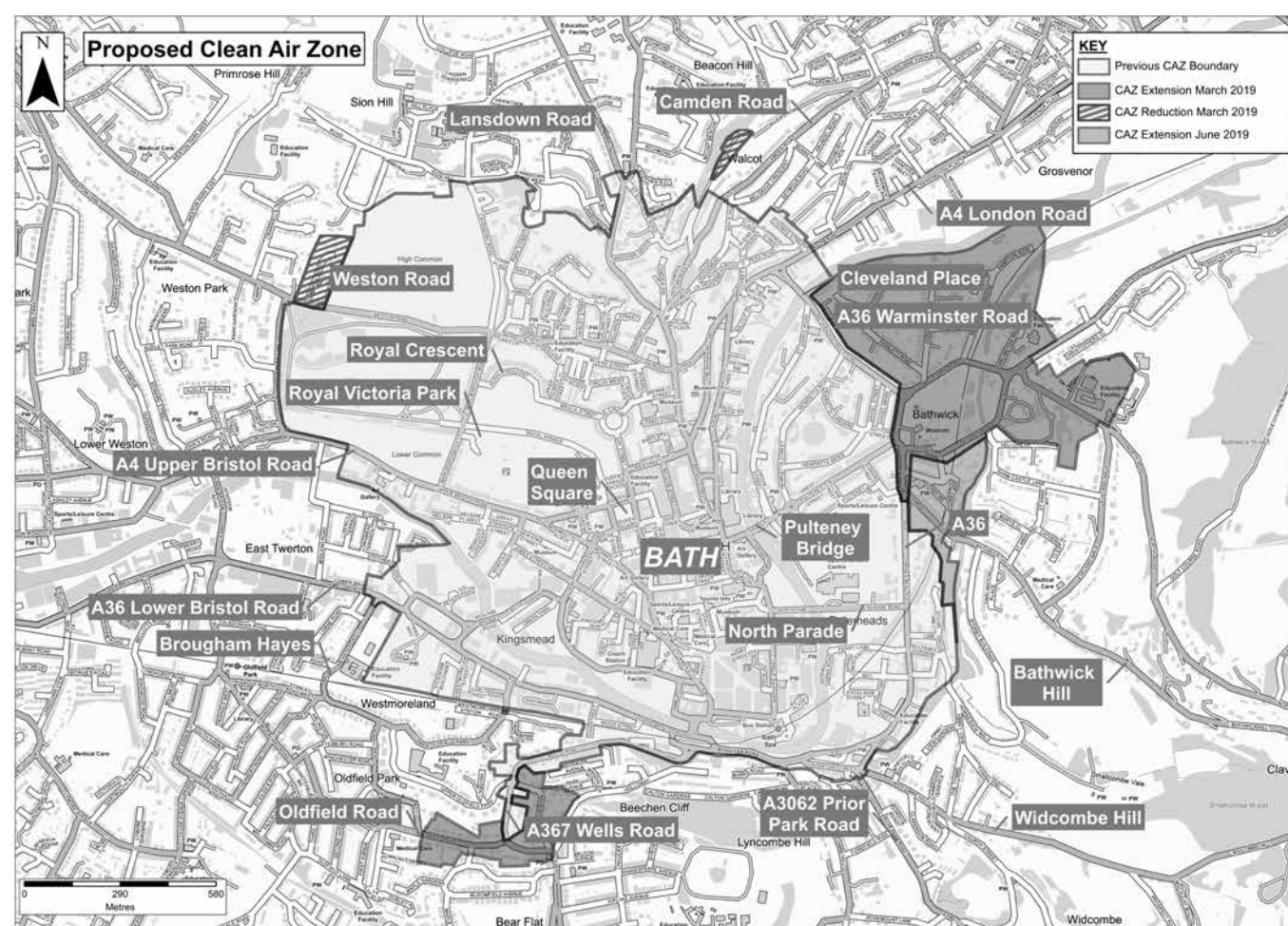
March 2019

- Inclusion of Pulteney Estates residents' association area
- Exclusion of Cranhill Road and Rivers Road
- Inclusion of Oldfield Road/A367 junction area
- Inclusion of Bathwick Estates residents association area
- Inclusion of Sydney Gardens residents association area

June 2019

- Inclusion of Sydney Wharf
- Inclusion of Raby Mews
- Inclusion of Sydney Mews
- Inclusion of Raby Place/Bathwick Hill (west of the canal)

The boundary details can be seen in more detail at bathnes.gov.uk/zonemaps and at our consultation events.



Section 2 continued

2. If you'd like to comment on these changes, please use the space below naming the street/area to which you are referring.

☐ No comments. Please skip to Question 3.

Section 3

Queen Square proposals

In the accompanying consultation leaflet (page 13), we've illustrated proposals to reduce traffic flows through Queen Square that are required for a class C charging zone to achieve the required air quality improvements by 2021 at the latest. This is a temporary measure that will be removed once compliance is achieved.

New traffic lights will be placed at the junctions with the A367 Chapel Row/Princes Street and at Queen Square Place to moderate the flow of traffic into Gay Street. This is predicted to divert some vehicles along Julian Road, Marlborough Buildings and Cavendish Road, and create a small increase in NO₂ levels at Whiteway Road, Rush Hill, and Lansdown Lane. However, levels of NO₂ are not expected to exceed the legal threshold at these locations or in any other area of Bath. Please refer to the leaflet (page 13) for a map and more information.

3. If you would like to comment on the Queen Square proposals and the associated changes in traffic flows, please use the space below.

☐ No comments. Please skip to Question 4.

Section 4

Support packages

In the accompanying consultation leaflet (page 15), we've outlined a package of financial and practical support for local businesses and individuals affected by the charges along with measures to reduce the impact of the zone on residents. These are subject to final confirmation of funding from central government.

4. To date we've been successful in securing up to £10 million from central government for the initiatives listed below. Please indicate whether these are applicable to you or your business, and useful to the affected groups. Please answer each in turn:

☐ No comments. Please skip to Question 5.

	Applicable to you/ your business?			Useful to those affected?		
	Yes	No	Not Sure	Yes	No	Not Sure
Financial support to upgrade older buses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial support for local business and individuals affected by charges to upgrade pre-euro 6 diesel and pre-euro 4 petrol vehicles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Travel advisors to work with residents and businesses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-idling enforcement to directly improve air quality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Weight restriction enforcement to stop inappropriate rat running	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you would like to expand on your answers above, or have any other comments, please use the space below.

Section 4 continued

5. When our final plan is submitted to government, we'll ask for additional money to fund the initiatives listed below, with last mile delivery and servicing support as a priority. Please indicate whether these are applicable to you or your business, and useful to the affected groups. *Please answer each in turn:*

☐ No comments. Please skip to Question 6.

	Applicable to you/ your business?			Useful to those affected?		
	Yes	No	Not Sure	Yes	No	Not Sure
Last mile delivery and servicing support for businesses within the CAZ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incentives for van drivers to use the park & ride sites	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additional EV charging points for van and taxi / PHV drivers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you would like to expand on your answers above, or have any other comments, please use the space below.

Section 5

Reinvesting revenue from the zone

In the accompanying consultation leaflet (page 16), we've outlined how we propose to spend any revenue from the zone to encourage more sustainable transport and travel among all motorists. We also outline how we plan to form a steering group of councillors, business representatives and other interest groups to help review and prioritise proposals.

Further detail can be found in Annexe 5 of the draft charging order. (See page 2).

6. Please indicate your level of support for each of the initiatives below. Please answer each in turn and tick one per row:

☐ **No comments. Please skip to Question 7.**

	Support		Neutral		Do not support	Don't know
	5	4	3	2	1	
Enhancing the supporting measures already being provided to help offset the impact of the CAZ on businesses and individuals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhancing the monitoring and evaluation of the scheme and implementing contingency plans if required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting walking, scooting and cycling to school initiatives and creating school streets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting and enhancing the public transport network, including home to school transport	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Providing additional park & ride capacity at existing park & ride sites and on existing bus routes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Providing schemes to reduce the impact of vehicles on the health and wellbeing of residents and visitors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhancing other sharing schemes such as the electric cycle hire scheme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting the development of a mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you would like to expand on your answers or have any other comments, please use the space below:

Section 6

Boundary infrastructure (signs and cameras)

To review the boundary maps that illustrate where CAZ signage and automatic number plate recognition (ANPR) cameras will be placed, please attend one of our consultation events, or go online at **bathnes.gov.uk/zonemaps**. There are a number of constraints on where we can place signs and cameras (e.g. existing buried services, sightlines etc.) but we'll do our best to address any areas of concern.

7. If you would like to record any comments on signage and camera placement, please use the space below naming the street/area to which you are referring.

☐ No comments. Please skip to Question 8.

Section 7

Details of the draft charging order

The charging order is a legal document that will form the basis for enforcing the zone. It includes details on how the zone will operate, including charges, charging policies, exemptions and concessions – much of which was approved by the council following the last consultation.

We'd like to give you a final opportunity to comment before these details become law. You can read the full draft charging order either online at **bathnes.gov.uk/CAZconsultation**, or at any local B&NES library or one stop shop. We've also summarised key areas of the draft charging order in the accompanying consultation leaflet (in plain English):

- The boundary of the zone – **pages 6-7**
- Minimum emission standards, what vehicles will be charged, and charges for non-compliant vehicles – **pages 8-9**
- National and local exemptions and local concessions and how these will work – **pages 10-11**
- The charging and enforcement policy e.g. hours of operation, how you'll pay and enforcement processes – **page 12**

8. If you'd like to comment on the information as it's presented in the draft charging order, or as summarised in the consultation leaflet, please use the space below.

Please state the area you refer to e.g. 'Exemption for...' or 'Concession for...'.

If you're commenting on text within the legal charging order itself, please give a page number plus the schedule or annexe number.

☐ **No comments. Please skip to Question 9.**

Section 8

Further Comments

9. If you would like to record any other comments you have about the scheme's details as summarised in the consultation leaflet, please use the space below.

☐ No comments. Please skip to Question 10.

Section 9

About you

You're nearly finished!

The council is committed to ensuring its services are accessible to everyone. The following questions help us to understand whether different groups of people have different views. Some of this information can be regarded as highly personal and so 'prefer not to say' options have been included.

10. How did you hear about this consultation?

Please tick one:

- ☐ Local media e.g. radio, television or printed newspaper
- ☐ Social media e.g facebook or twitter posts from media/friends/the council
- ☐ Postcard (sent to all addresses and some neighbouring addresses in B&NES)
- ☐ Word of mouth
- ☐ Prefer not to say
- ☐ Other (*please state below*)

Section 9 continued

11. Which one of the following options best describes how you are responding to this questionnaire. Please tick one:

- ☐ As a resident (please skip to Q18)
- ☐ Commuter (please skip to Q18)
- ☐ Tourist/visitor/student (please skip to Q18)
- ☐ On behalf of a group of individuals.
Please state the name in the space provided below
- ☐ On behalf of a business/organisation (this includes taxi drivers, sole traders and the self-employed)

Name of group, organisation or business

Questions for business/organisation respondents

12. Please tick to confirm you are authorized to respond on behalf of this business or group

- ☐ Yes, I confirm ☐ No

13. Where is your business or organisation? Please tick one:

- ☐ In the revised zone (see map) ☐ In Bath but outside of the zone
- ☐ In B&NES but not in Bath ☐ In a neighbouring authority
- ☐ Further afield

14. Please provide the first half of your business or organisation postcode (up to four digits) e.g. BA1, BA15.

15. Please provide the first digit of the second half of your postcode.

16. Does your business/organisation own, operate or rely on vehicles travelling in the centre of Bath? Please tick one:

- ☐ Yes ☐ No ☐ Don't know

Section 9 continued

17. Please indicate which of the following employment sectors your business or organisation sits within. Please tick one:

- | | |
|---|--|
| <input type="checkbox"/> Financial and insurance activities | <input type="checkbox"/> Manufacturing |
| <input type="checkbox"/> Human health and social work activities | <input type="checkbox"/> Construction |
| <input type="checkbox"/> Accommodation and food service activities | <input type="checkbox"/> Transportation and storage |
| <input type="checkbox"/> Wholesale and retail trade; repair of motor vehicles and motorcycles | <input type="checkbox"/> Arts, entertainment and recreation |
| <input type="checkbox"/> Education | <input type="checkbox"/> Mining and quarrying |
| <input type="checkbox"/> Public administration and defence; compulsory social security | <input type="checkbox"/> Electricity, gas, steam and air conditioning supply |
| <input type="checkbox"/> Other service activities | <input type="checkbox"/> Water supply; sewerage, waste management and remediation activities |
| <input type="checkbox"/> Information and communication | <input type="checkbox"/> Administrative and support service activities |
| <input type="checkbox"/> Real estate activities | <input type="checkbox"/> Other |
| <input type="checkbox"/> Professional, scientific and technical activities | Please state: |

If you are responding on behalf of a business, you have reached the end of the survey.

Thank you for completing this consultation questionnaire. The council will give due consideration to your comments before submitting its final business case to central government for approval in December 2019.

Section 9 continued**Questions for residents/commuter/tourists**

18. Please indicate the vehicle you mainly use. Please tick one:

- ☐ I/we do not drive or operate a vehicle
☐ Car
☐ Motorbike
☐ LGV/van/minibus
☐ HGV
☐ Bus
☐ Coach
☐ Other (please specify)

19. Where do you live? Please tick one:

- ☐ In the revised zone (see map)
☐ In Bath but outside of the zone
☐ In B&NES but not in Bath
☐ In a neighbouring authority
☐ Further afield

20. Please provide the first half of your business or organisation postcode (up to four digits) e.g. BA1, BA15.

21. Please provide the first digit of the second half of your postcode.

22. What would best describe your professional or working status?

Please tick one:

- ☐ Prefer not to say
☐ Employed
☐ Self-employed
☐ Retired
☐ Not in work
☐ Student

23. What was your age at your last birthday? Please tick one:

- ☐ Under 16
☐ 17-24
☐ 25-34
☐ 35-44
☐ 45-54
☐ 55-64
☐ 65 and over

24. Do you have any dependent children? Please tick one:

- ☐ Prefer not to say
☐ Yes
☐ No

25. Do you consider yourself to have a long-term condition that limits your day-to-day activities? Please tick one:

- ☐ Prefer not to say
☐ Yes
☐ No

26. How do you define your gender? Please tick one:

- ☐ Prefer not to say
☐ Male
☐ Female

Thank you for completing this consultation questionnaire. The council will give due consideration to your comments before submitting its final business case to central government for approval in December 2019.



Appendix B. - Questionnaire data on respondent type

DRAFT

Appendix B. - Questionnaire data on respondent type

This appendix summarises the additional information gathered in the survey relating to business respondents such as location and business type (question 12 to question 17), as well as additional information relating to other respondents (resident/commuter/tourist/visitor/student) including vehicle driven, location and age (question 18 to question 26).

How the respondent heard about the consultation (question 10), who the respondent was responding on behalf of (question 11) and a combined summary of respondents' home / business locations (Questions 13, 14, 15 (businesses) and 19, 20 and 21 (individuals)) are reported in section 3 of the main report.

This appendix is split into two Sections and reported based on who the respondent was responding on behalf of (question 11), in line with the structure of the questionnaire. The first section (B.1) reports business / organisation respondents, who account for 7% of the respondents (42) and the second section (B.2) reports resident / commuter / tourist / visitor / student respondents, who account for 79% of respondents (472). The remaining 14% of respondents (83) did not provide any additional data including who they were responding on behalf of (question 11) or responses to further questions.

B.1 Business/organisation respondents

This section summarises the responses provided by respondents identifying as a business or organisation. In total, 42 respondents identified themselves as a responding on behalf of a businesses or organisation.

Are you authorised to respond on behalf of the business or organisation?

Question 12 asked respondents to confirm whether they were authorised to respond on behalf of their business or organisation. Of the 42 businesses or organisations, 93% indicated that they were authorised to respond.

Table B-1: Respondents to Question 12 – are you authorised to respond on behalf of the business/organisation?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 12	41	98%
Respondents that skipped Question 12	1	2%
Yes, I confirm	39	93%
No	2	5%

Where is your business or organisation?

Questions 13 to 15 related to the location of business and organisations asking respondents about their location relative to the zone and about their postcode. The distribution of businesses was relatively equal between being in the zone, in Bath but not in the zone, in B&NES but not in Bath and in a neighbouring authority.

Table B-2: Respondents to Question 13 – where is your business/organisation?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 13	38	90%
Respondents that skipped Question 13	4	10%

	Number of respondents	Percentage of business/ organisation respondents
In the revised zone (see map)	11	26%
In Bath but outside the zone	8	19%
In B&NES but not in Bath	10	24%
In a neighbouring authority	9	21%

Figure 3-1 in the main report shows the distribution of businesses across Bath based on the postcode provided in Questions 14 and 15.

Table B-3: Respondents to Questions 14 and 15 – what is the first half / first letter of the second half of your business postcode?

	Number of respondents	Percentage of business/ organisation respondents
Respondents that answered Question 14	36	86%
Respondents that skipped Question 14	4	14%
Respondents that answered Question 15	34	81%
Respondents that skipped Question 15	8	19%
BA1 1	1	2%
BA1 2	3	7%
BA1 3	2	5%
BA1 5	1	2%
BA1 6	1	2%
BA2 1	1	2%
BA2 2	2	5%
BA2 4	2	5%
BA2 6	6	14%
BA2 8	2	5%
BA2 Blank	1	2%
BA3	3	7%
BA12	1	2%
BA14	2	5%
BA15	4	10%
BA16	1	2%
BS31	2	5%
SN12	1	2%

The majority of businesses were located within BA2 6 (14%) followed by BA15 (10%). It should be noted that the analysis of postcode data has assumed that in answering Question 14, respondents only provided the first half of their postcode, rather than the first half and the first letter of the second half, i.e. if a postcode was BA1 5XX, they only entered “BA1” for question 14 and entered “5” in question 15.

Does your business / organisation own, operate or rely on vehicles travelling in the centre of Bath?

Question 16 asked respondents whether they owned, operated or relied on vehicles travelling in the centre of Bath. Of the 42 business respondents 90% answered question 17. The number of business which did utilise a vehicle in Bath (19) was comparable with those who did not (18).

Table B-4: Respondents to Question 16 – does your business/organisation own, operate or rely on vehicles travelling in the city centre?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 16	38	90%
Respondents that skipped Question 16	4	10%
Yes	19	45%
No	18	43%
Don't know	1	2%

Which employment sector does your business or organisation sit within?

Question 17 asked respondents which employment sector their business or organisation sits within. Of the 42 business respondents, 88% responded to question 17. The majority of respondents stated that they belonged to sectors not included in the list such as local government (6), residents' associations (4) and gardening and landscaping (2). 6 respondents selected transportation and storage.

Table B-5: Respondents to Question 17 - what employment sector does your business/organisation sit within?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 17	37	88%
Respondents that skipped Question 17	5	12%
Administrative and support service activities	1	2%
Education	3	7%
Electricity, gas, steam and air conditioning supply	2	5%
Human health and social work activities	1	2%
Other service activities	2	5%
Other, please state:	19	45%
Professional, scientific and technical activities	1	2%
Public administration and defence; compulsory social security	1	2%
Real estate activities	1	2%
Transportation and storage	6	14%

B.2 Resident/commuter/tourist/visitor/student respondents

This section summarises the responses provided by residents, commuters, tourists, visitors and / or students. In total, 472 respondents identified themselves as a responding on behalf of these groups.

What is the main vehicle you use / operate?

Question 18 asked respondents about the main vehicle that they own or operate. Of the 472 individual respondents, 93% responded to question 18. The majority of respondents (71%) expressed that their main vehicle was a car which would be unaffected by the charges. 7% of respondents selected that they drove a vehicle which would be affected by the charges (bus, coach, LGV / van / minibus). 10% of respondents selected that their predominate vehicle was “other” than those listed such as a motorhome, campervan or bike.

Table B-5: Respondents to Question 18 – What is the main vehicle you use or operate?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 18	463	98%
Respondents that skipped Question 18	9	2%
Bus	22	5%
Car	336	71%
Coach	1	0%
I do not drive or operate a vehicle	41	9%
LGV / van / minibus	10	2%
Motorbike	2	0%
Other (please specify)	49	10%

Where do you live?

Questions 19 to 21 related to the home location of individuals asking respondents about their home location relative to the zone and about their postcode. The majority of respondents identified that they lived in Bath but outside the zone (55%) whilst nearly a quarter of individual respondents (24%) stated that lived within the zone.

Table B-6: Respondents to Questions 19 – where do you live?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 19	457	97%
Respondents that skipped Question 19	15	3%
In the revised zone (see map)	111	24%
In Bath but outside the zone	261	55%
In B&NES but not in Bath	54	11%
In a neighbouring authority	27	6%
Further afield	4	1%

Figure 3-1 in the main report shows the distribution of respondents' home locations across Bath based on the postcode provided in questions 20 and 21.

Table B-7: Respondents to Questions 14 and 15 – what is the first half / first letter of the second half of your business postcode?

	Number of respondents	Percentage of business/organisation respondents
Respondents that answered Question 20	449	95%
Respondents that skipped Question 20	23	5%
Respondents that answered Question 21	436	92%
Respondents that skipped Question 21	36	8%
BA1 1	3	1%
BA1 2	38	8%
BA1 3	14	3%
BA1 4	9	2%
BA1 5	27	6%
BA1 6	35	7%
BA1 7	17	4%
BA1 8	1	0%
BA1 9	3	1%
BA1 Blank	6	1%
BA2 0	4	1%
BA2 1	11	2%
BA2 2	44	9%
BA2 3	23	5%
BA2 4	46	10%
BA2 5	12	3%
BA2 6	77	16%
BA2 7	12	3%
BA2 8	7	1%
BA2 9	3	1%
BA2 Blank	3	1%
BA13	1	0%
BA15	19	4%
BA16	1	0%
BA3	12	3%
BA4	1	0%
BA5	1	0%
BS30	1	0%
BS31	7	1%
BS39	5	1%
SN10	1	0%
SN14	1	0%
Undecipherable	2	0%

The majority of residents' home locations were within BA2 6 (16%) followed by BA2 4 (10%). It should be noted that the analysis of postcode data assumed that in answering Question 14, respondents only provided the first half of their postcode, rather than the first half and their first letter of the second half, i.e. if a postcode was BA1 5XX, they only entered "BA1" for question 14 and entered "5" in question 15.

What would best describe your professional or working status?

Question 22 related to the employment status of the respondents. 38% of the individual respondents stated that they were employed, followed by 31% who stated that they were retired.

Table B-8: Respondents to Question 22 – professional or working status of respondents

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 19	458	97%
Respondents that skipped Question 19	14	3%
Employed	180	38%
Not in work	20	4%
Retired	146	31%
Self-employed	74	16%
Prefer not to say	33	7%

What was your age at your last birthday?

Question 23 related to the age of the respondent. The over half of individual respondents (51%) were over the age of 55 whilst 35% were between the ages of 35 and 54.

Table B-9: Respondents to Question 23 – Age of respondents

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 23	464	98%
Respondents that skipped Question 23	8	2%
17-24	7	1%
25-34	23	5%
35-44	87	18%
45-54	76	16%
55-64	107	23%
65 and over	134	28%
Prefer not to say	30	6%

Dependent children

Question 24 related to whether the respondents had any dependent children. The majority of individual respondents (53%) indicated that they did not have any depended children whilst 37% responded that they did.

Table B-10: Respondents to Question 24 – do you have any dependent children?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 24	452	96%
Respondents that skipped Question 24	20	4%
Yes	176	37%
No	249	53%
Prefer not to say	27	6%

Long-term condition

Question 25 related to the long-term conditions. Of the 472 individual respondents, 79% considered that they did not have a long-term health condition whilst 12% did.

Table B-11: Respondents to Question 25 – do you consider yourself to have a long-term condition that limits your day-to-day activities?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 25	459	97%
Respondents that skipped Question 25	13	3%
Yes	58	12%
No	373	79%
Prefer not to say	28	6%

Gender

Question 26 related to the respondents' gender. Of the 472 respondents, males made up 47% of respondents whilst females comprised 42% and 8% preferred not to say.

Table B-12: Respondents to Question 26 – how do you define your gender?

	Number of respondents	Percentage of individuals responding
Respondents that answered Question 25	457	97%
Respondents that skipped Question 25	15	3%
Male	220	47%
Female	200	42%
Prefer not to say	37	8%

Appendix C. – Summary of businesses and organisations

DRAFT

Appendix C: Summary of businesses and organisations

This appendix provides a summary of the comments received from businesses and organisations through the questionnaires, emails and letters. Comments are presented by business / organisation type:

- Elected representatives and political parties;
- Businesses;
- Transport operators and organisations;
- Residents association;
- Local, parish and town councils;
- Schools; and
- Other organisations.

These comments have been summarised and reported in the corresponding topic sections in the main report, alongside the data from the qualitative questions of the questionnaire. However, this appendix provides further details of the feedback/responses received (and the format in which the responses were received).

Table C1: Feedback from elected representatives and political parties

Via	Overview of Comments
Elected representatives and political parties	
Questionnaire	<p>Policies should be based on scientific evidence. The Council should not adopt policies that displace problems or allow vehicles causing the problem into the zone.</p> <p>The scheme will fail to meet its stated objective of reducing NOx levels below legal limits if private cars are not restricted (Class D CAZ). Suggest all private diesel vehicles of any age should be charged by default as well as all commercial diesel vehicles not reaching Euro 6 standards.</p> <p>Suggest that any scheme should include the entire city, as defined by city ward boundaries. Concern about displaced traffic. Drivers of vehicles subject to charging will choose to skirt the area of the CAZ by using roads adjacent to its boundary, moving the most polluting traffic to residential roads including:</p> <ul style="list-style-type: none"> • To the south (Cleveland Walk, Bathwick Hill, Sydney Buildings, Horseshoe Walk, Abbey View, The Tynning, Church Rd, Church St, Rosemount Lane, Lyncombe Vale, Lyncombe Vale Rd, Greenway Lane, Junction Rd, Upper Oldfield Park, Lower Oldfield Park and Brougham Hayes). • Despite being partially covered by the zone, an uncharged route is still available on Wellsway, Wells Road and Oldfield Rd. Similarly, to the north Larkhall, Richmond Road, Charlecombe, Lansdown Rd, Sion Rd, Winifred's Lane, Cavendish Rd, Marlborough Buildings and Marlborough Lane. <p>Support traffic reduction measures, especially in city centres, and efforts to reduce traffic in Queen Square.</p> <p>Do not support the displacement of traffic and NOx, particularly reducing levels in an area that has significant commercial use and increasing it in areas which are significantly residential.</p> <p>Change boundaries to include the whole city in the CAZ would eliminate this trade-off and improve air in residential suburbs as well as the city centre.</p> <p>Non-profit organisations and municipal transport should automatically receive support. Expectation that the cost of upgrading commercial vehicles comes from company profits. Where an operator cannot meet these costs without risking the business subsidy could be considered.</p> <p>The council should lobby WECA to create a municipal bus company run for the most environmentally friendly way of moving people, rather than profit. Where legislation has not yet been changed to allow this, franchises close to this principle should be used.</p> <p>Support for individuals should be means-tested.</p> <p>Strongly support active transport options. The primary recommendation of the travel advisors should be active transport (walking, cycling) wherever possible.</p> <p>Anti-idling should be rigorously enforced regardless of the CAZ.</p> <p>All roads should have weight restrictions, with higher weights only being allowed where there is a specific reason for doing so. The CAZ does nothing to stop the inappropriate traffic already on many Bath roads, such as large HGVs.</p>

Via	Overview of Comments
	<p>Do not support expanding park and ride sites - the money should be spent on improving regional public transport. Strongly support any scheme to promote electric bikes.</p> <p>As the signs are defined by a national standard there doesn't seem much scope for comment on the design of what appears on them. The proposals seem clear. However, dedicating space on the signs to the logo of the local authority seems unnecessary and adds visual clutter as well as signs being larger than necessary.</p> <p>The structure of the posts and construction materials used for the signs should be in-keeping with their locations and as environmentally friendly as possible, including durability and ease of maintenance.</p> <p>For infrastructure requiring power, such as lighting and cameras, renewable sources should be used wherever possible.</p> <p>The Council should communicate with providers of satellite navigation systems well ahead of the CAZ being implemented so that drivers using these systems are made aware of the CAZ on their devices. The need for signs and possible confusion about where charging starts would be reduced if the CAZ boundary covered all city wards.</p> <p>Goal must be to aim to eliminate as much traffic-related pollution as possible and promote a modal shift to active transport options and, where mass transport is necessary, the least harmful options.</p> <p>Most of the city centre should be closed to motor traffic except for delivery/service/ emergency vehicles.</p> <p>Design for these streets would be to promote pedestrian and cycle use, or trams. Substantial change is more likely to succeed with the support of the people.</p> <p>Comment on consultation - character limits are too low for these responses on such an important topic.</p>
Questionnaire	<p>Very concerned about the impact of the Queen Square proposals on:</p> <ul style="list-style-type: none"> • Royal Avenue • Marlborough Buildings junction • Julian Road • St Andrews Primary School <p>Measures to improve public transport, walking, cycling are essential, lacking compared to other cities and long overdue. Wish to see investment in pedestrian crossings and safe cycle routes.</p>
Questionnaire	<p>Concerned that traffic will bypass the zone and cut through residential streets. Notes modelling suggests there will be increased traffic on Englishcombe Lane. Residents are also concerned about:</p> <ul style="list-style-type: none"> • Monkesdale Road • Cotswold Road • Egerton Road • Hensley Road • Bloomfield Road <p>Traffic changes on these routes must be carefully monitored and addressed, if necessary, through traffic management.</p> <p>Low Traffic Neighbourhoods could be important to manage the impacts of the CAZ.</p> <p>There should be clear signage on the Clean Air Zone well before the boundaries of the zone e.g. before traffic diverts from Whiteway Road and Frome Road.</p>
Email	<p>Welcome change to a Class C. However, concerned that there is insufficient detail on work that has been done on the routing of non-compliant traffic around Bath. Concern that the most polluting traffic travelling from the south to the M4 will divert around the east of Bath, moving air quality problems into these areas. More information is needed on how B&NES will work with neighbouring authorities to mitigate this.</p> <p>Essential the link is retained for the D1 bus service linking residents with work, school and social opportunities in Bath, with no reduction in service or increase in fares as a result of charging buses. Delay to introduction of charges to bus services from rural areas, to ensure transition to compliant vehicles.</p>

Table C2: Feedback from businesses

Via	Overview of Comments
Businesses	
Questionnaire	<p>Would like the air quality improvements to be in place as soon as possible. Supports diesel and high emission vehicles should be included within CAZ (i.e Class D).</p> <p>London Road should be included within the boundary.</p> <p>Concern traffic light proposals on Queen Square will cause more pollution due to stop/start.</p> <p>Support financial support for upgrade of older bus vehicles and local businesses and individuals to upgrade vehicles, travel advisors and anti-idling and weight restriction enforcement. Also suggests education and support to understand and make changes to vehicles.</p>
Email	<p>Concern over recovery vehicle being non-compliant. Travels daily into CAZ, therefore paying a daily charge would compromise the business, cannot afford to replace vehicle.</p>
Questionnaire	<p>New roads are needed around Bath to carry heavy traffic. Improve connections to A36 A4 and A367 away from central areas</p>
Questionnaire	<p>Request concession for businesses living/working in the zone. Consider an interest free loan is the worst option as this will be unaffordable.</p>
Questionnaire	<p>Support should be provided to low profit businesses that employ local people.</p> <p>Concern that some cars emit more emissions than small or medium sized vans.</p>
Questionnaire	<p>Urge consideration of concessions for city-based businesses. Concessions should be long enough for businesses to upgrade vehicles in a natural timeframe and not be forced into debt or businesses be put at risk. Concerned for how businesses will manage debt they cannot afford.</p>
Questionnaire	<p>Concerned for impact on deliveries. Sceptical of practicality of van drivers using Park and Ride. Queries how weight restrictions and anti-idling will be enforced.</p>
Questionnaire	<p>Businesses with multiple non-compliant vans should have longer concessions to help manage changes over a longer period.</p>
Questionnaire	<p>There should be exemptions for wheelchair accessible vehicles</p>
Questionnaire	<p>Concern that the CAZ penalises hauliers who use the A4 to access the A36.</p> <p>Concern that the proposal confuses the definition of LGV with HGV</p>
Questionnaire	<p>Consider that all vehicles should be charged or none at all. Consider the proposal to be financially/politically motivated and wrong/will not work. Consider problems at Queen Square are caused by parked cars and too many pedestrian crossings.</p>
Questionnaire	<p>Supports the CAZ, however private vehicles should also be included.</p> <p>The CAZ should be supported by an additional Park and Ride to the north - east of the city (Bathampton/Batheaston Meadows). This would help van drivers to be encouraged to use Park and Ride sites.</p> <p>The numbers of private cars, coaches and delivery vehicles entering the city should be reduced by establishing a Park and Ride facility to the north - east of the city. Government money should be sought to (a) establish the P&R site, and (b) construct a station on the railway line for visitors and commuters to use.</p>
Questionnaire & Email	<p>Small businesses unfairly targeted by CAZ, do not have the money to replace fleet (3 of 4 vehicles uncompliant). Would have to pay for all emergency gas and water callouts, as live within the zone.</p> <p>Exemption for small companies within the zone who carry out work for Bath residents and businesses. Or a longer exemption period to enable fleet replacement over a reasonable time.</p> <p>Park & Ride east side of the city and Bath bypass would also assist in reducing traffic accessing centre Bath.</p>
Email	<p>Mildly supportive of CAZ. However has been pushed to upgrade works vehicle, due to previous non-compliant vehicle, at great outlay to business which could have been spent on employing a new member of staff.</p> <p>Better to have offered concessions to small businesses living within a specific radius and work within Bath.</p> <p>Otherwise bigger companies will send in tradesman as they can afford to and force smaller traders out of the city.</p>

Via	Overview of Comments
Letter	<p>Supports objectives and proposals to improve air quality.</p> <p>Already commercial challenges fleets currently face regarding vehicle availability, grid capacity and final mile delivery, any restrictions need to be balanced with recognition of importance of road freight, providing critical delivery and collection services for businesses and consumers in Bath.</p> <p>Support financial support for vehicle upgrades. Extend to provide support and funding to companies wanting to electrify their fleet and invest in grid capacity/deploy smart grid technology to enable charging of fleets overnight in a cost effective way.</p> <p>Recommends consideration of other non-charging mitigation measures such as centralised eco-hub to enable last mile e-cargo bike deliveries, EV charging infrastructure, exemptions or accepted compliance for range extended electric vehicles.</p> <p>Urges B&NES to consider a daily penalty for non-compliant vehicles at the same level set by other cities – i.e. Leeds, Birmingham, at no more than £50.</p> <p>Nationwide policy on intercity charging, so vehicles are only charged once per day regardless of number of CAZ entered.</p>

Table C3: Feedback from transport operators / organisations

Via	Overview of Comments
Transport operators and organisations	
Letter	<p>Supportive of tackling pollution but should be balanced against their impact on the economy and people's quality of life.</p> <p>Other measures should be considered before charging CAZ is implemented.</p> <p>Where a Clean Air Zone is required:</p> <p>Provide a managed transition for businesses and individuals</p> <p>Ensure smart use of road space</p> <p>Ensure CAZ are a catalyst for behaviour change</p> <p>Promotion of leasing and renting</p> <p>Introduce funding for HGVs</p>

Via	Overview of Comments
Letter	<p>Question 1:</p> <p>Severe concerns as to the CAZ and the detrimental impact on the local economy of Bath.</p> <p>Support for non-charging measures, to target hotspot areas, including: improving traffic flow to reduce congestion; encourage improved driver behaviour; and encouraging favourable conditions for HGVs to operate outside of normal business hours. Reference Southampton City Council proposals to implement non-charging measures only.</p> <p>Concern that small HGV and LCV operators will be disproportionately impacted: practical HGV upgrade concerns, displacement, negative commercial impact on HGV/LCV operators.</p> <p>Question 2:</p> <p>Concern over inclusion of A36, as a primary route with no real alternatives, which also serves other locations – not Bath - and resultant traffic displacement to adjacent local roads. Request B&NES evaluate the displacement of traffic and assess the benefits of excluding the A36 from CAZ</p> <p>Question 4 & 5:</p> <p>Support financial assistance to support businesses and individuals for upgrade of non-compliant vehicles. Seek clarity on the terms of HGV operators on how the scheme would be administered.</p> <p>Question 7:</p> <p>Urge use of easy-to-understand signage at the height of HGVs sitting in their cabs.</p> <p>Question 9:</p> <p>Recommends intelligent phasing of charges applied.</p> <p>Concerns of charge amount for non-compliant HGVs</p> <p>Clarity on charging to enter a Clean Air Zone – not just Bath - i.e. HGVs enter multiple cities in a day. Charging in each Zone would be disproportionate.</p> <p>When do B&NES plan to stop charging HGVs?</p> <p>Support cleaner air, not at the cost of businesses closing, jobs being lost/price of goods rising and HGV/LCV operators being priced out of supplying goods and services into clean air zones.</p> <p>Ready to work with B&NES on non-charging measures.</p>
Questionnaire	<p>Would prefer a two stage CAZ like London's LEZ/ULEZ. Does not consider that targets can be met by excluding cars.</p> <p>Concerned that the Queen Square proposal will push the problem elsewhere.</p> <p>Concerned that charges to coaches will disproportionately affect poorer schools.</p> <p>Question hours of operation – thought this would run from 03:00.</p> <p>Sceptical about van drivers using Park and Ride.</p>
Questionnaire	<p>Questions how the ANPR system will be capable of charging private hire/taxi vehicles from other authorities.</p>
Email	<p>Express concern for bus companies within the area, stating that they will cease operation to/from Bath before the charge comes into pay (2020).</p> <p>Also highlight that it is discriminatory the charge Euro 6 buses but not private vehicles</p>
Questionnaire	<p>Business is located within the zone. The implementation of the charge should be phased, with exemption for businesses within the zone for at least 6 years until able to change vehicles. Discriminating against businesses who provide services to the people of Bath. Especially as they were encouraged to buy diesel by the government.</p> <p>Park & Ride should be located to the east of Bath and a bypass for A46 and A36, this would reduce emissions.</p> <p>Support financial support for local businesses and individuals to upgrade vehicles. Last mile delivery and servicing support is applicable to their business.</p> <p>Businesses within the zone should be totally exempt as it will greatly affect our business. It would be a tax on local residents of Bath as we provide a 24/7 service. Emergency work plumbing and heating. Our vehicles will be worthless and will depreciate rapidly as who would want a diesel vehicle in these zones. The council/government will NEED to provide compensation if this happens.</p> <p>There should be in place compensation packaged to offset the greatly reduced values of the vehicles. And a scheme to help purchase new vehicles. 50% towards cost of new vehicle and depreciation value and a business tax reduction incentive. Interest free loan is not acceptable.</p>

Via	Overview of Comments
Letter	<p>Not opposed to the proposal. Does not consider the impact from historic vehicles to be substantial.</p> <p>Welcome the exemption for historic vehicles.</p> <p>Concern over the preparation of Charging Order relating to historic and near-historic buses (stemming from discussions with Leeds). Small number of buses and coaches entitled (by age) to be in historic taxation class, but for regulatory reasons are registered as Public Service Vehicles.</p> <p>Request an additional exemption to charging order, as has been constructed in Leeds, to be incorporated within Bath Charging Order. Also inclusion of "near-historic" buses, who can carry disabled passengers.</p>
Email	<p>State that it supports the implementation of a Class D CAZ as this is likely to have the biggest overall effect on improving air quality. Suggest that sustainable methods, specifically the bus, should be the focus of any air quality strategy implemented. Expressed support for key initiatives outlined in the Proposed Scheme. Wished to know more on funding and gain certainty on how fleet replacement programmes will be undertaken.</p>
Questionnaire	<p>Answers to quantitative questions only.</p>
Questionnaire	<p>Notes that in previous discussions with the coach operators group a change to the time period of the CAZ – from 03:00 to 02:59 was discussed/agreed but notes that this is not shown in the consultation documentation?</p> <p>Concerned that they do not understand the detail of the financial support and how it will apply to their business.</p> <p>Consider that where the price of coach travel increases, people will travel by car instead and that this will not solve the problem.</p>
Questionnaire	<p>Concerned for affordability for taxi drivers requiring replacement vehicles. Considers the help offered is inadequate considering the cost of a hybrid vehicle.</p>

Table C4: Feedback from residents' associations

Via	Overview of Comments
Residents' Associations	
Email	<p>Concern that Queen Square proposals will displace traffic to Cavendish Road, St James' Square and Lansdown Crescent. Request that mitigation is put in place at the same time as the Queen Square scheme. Suggest creation of a Low Traffic Neighbourhood to include Cavendish Road, utilise the CAZ camera for a residents cell for Lansdown, build outs or a fixed speed camera.</p>
Letter	<p>Object to the change of CAZ from Class D to Class C, continue to support a Class D. The CAZ should represent one component of broader traffic management plan.</p> <p>Supportive of CAZ boundary.</p> <p>Concerned over the efficiency of proposed Queen Square traffic lights in reducing air quality in the immediate area.</p> <p>Support level of charging proposed originally.</p> <p>Recommend fewer exemptions and concessions than those proposed, support concession for residents of the CAZ.</p> <p>Support proposals to implement the plan in the shortest possible timeframe.</p> <p>Support transport alternative proposals to encourage better use of the park & ride, along with reinvestment of CAZ charging revenue in non-polluting public transport along with cycle friendly environments and infrastructure.</p> <p>Support complementary non-charging measures that incentivise change in behaviour, including low traffic neighbourhoods.</p>

Via	Overview of Comments
Letter & Email	<p>Support the principle of a CAZ and welcome range of supporting measures. Welcome the extension of CAZ boundary in Bathwick area, but as a result a small extension up to Sydney Buildings is requested.</p> <p>Request that B&NES should monitor traffic in all areas (as a result of displacement) and intervene promptly to mitigate any increased traffic volumes.</p> <p>Concern about non-compliant vehicles parking outside of the zone, particularly without RPZ in place.</p> <p>CAZ signage and camera will have an adverse impact on the public realm, signage should be the minimum necessary.</p> <p>Need for robust monitoring and evaluation of performance of the scheme including air quality and displacement of traffic, within and outside the CAZ.</p> <p>Concern traffic modelling does not include new developments with parking, including the Recreation Ground.</p> <p>Queen Square proposals, the traffic signals and signs will add to street clutter. The number should be minimised.</p> <p>Not convinced of the effectiveness of the proposed traffic light scheme, increasing congestion and pollution.</p> <p>Request reconsideration of option of closing some sides of Queen Square, which would also yield public realm benefits.</p> <p>Support action against idling and enforcement of HGV weight limits. Request for extra enforcement camera at key points, or weight limit for the entire CAZ. Welcome proposals for last mile delivery and servicing support for businesses within the CAZ.</p> <p>Suggest travel plan support for businesses is extended to schools.</p> <p>Rapid charging points should be provided at Park and Ride sites to avoid unnecessary additional vehicles into the CAZ. Charging points for commercial vehicles inside the CAZ only for small commercial vehicles (vans, taxis, PHVs) and not to larger commercial vehicles.</p> <p>Further measures including workplace parking levy, use of the A420 as an alternative route between Bristol and the east of Bath should be pursued. An alternative route for HGVs which currently use the A36-A46 route through Bath is essential.</p> <p>Strongly support extending opening hours at the Park & Ride sites, with secure overnight parking.</p>
Questionnaire	<p>Concerned that change from Class D to Class C doesn't reduce pollution overall all and focusses only on hot spots/legal limits. Support a Class D, if not now, then as soon as possible. Would like to see a Class D CAZ in 2-3 year to allow drivers to transition.</p> <p>Support boundary changes as these deal with rat running along Greenway Lane and Lyncombe.</p> <p>Would prefer a Class D CAZ with exemptions for Key Workers (public employees), and the elderly. Revenue used to reduce the cost of public transport, and then the exemptions phased out over a defined period (2-3 years) to encourage the use of public transport</p> <p>Car Parking in the city should be made much more expensive to both deter drivers, and subsidise public transport. All new parking planned (such as the new Rec development) should have substantial charging capacity.</p>
Email & Letter	<p>Support CAZ in its widest iteration, but to ensure no displacement of traffic and associated rat-running.</p> <p>Accept Queen Square proposals are required for compliance, however do not support Queen Square proposals as to the resultant displaced traffic particularly on Cavendish Road and Marlborough Buildings an onwards into residential area.</p> <p>Request to ensure that the displacement of traffic to Cavendish Road in particular is dealt concurrent with the changes at Queen Square, which may mean some temporary or permanent mitigations, suggestions include: creation of a Low Traffic Neighbourhood, build outs, raised tables, width restrictions, speed cameras and closure of the Charlotte Street car park entrance/exit.</p> <p>Ensure a plan for Cavendish Road not only reduces traffic, but also makes safer for children, pedestrians and cyclists.</p>

Via	Overview of Comments
Questionnaire & Letter	<p>Support Class D CAZ. Do not support Queen Square scheme due to displacement of traffic onto residential streets. Call for the Council to mitigate displacement on Cavendish Road and protect Lansdown Crescent (particularly as it is an important part of Bath's heritage). Suggested mitigations include: creation of a Low Traffic Neighbourhood, build outs, raised tables, width restrictions, speed cameras and closure of the Charlotte Street car park entrance/exit.</p> <p>Agree with CAZ boundary change but would like to see an advanced warning signage after Sion Hill to stop drivers using Lansdown Crescent to avoid the CAZ.</p>
Letter	<p>Disappointed in change of CAZ D to CAZ C. Reduces air quality and funds available to provide meaningful improvements to public transport and other measures to encourage behaviour change.</p> <p>Support the boundary extension in Bathwick.</p> <p>Oppose measures which displace traffic from one area to another, the Queen Square proposals will result in displacement. Mitigation is required to prevent the impact of extra traffic on residential roads affected.</p> <p>Displacement of traffic into residential areas is unacceptable and therefore such traffic reduction measures should not take place unless or until parallel measures are in place.</p> <p>Support measures for local businesses and bus providers, as long as measures are in place to scrutinise the awarding of funding to ensure it is fairly and appropriately allocated.</p> <p>Additional anti-idling and weight restriction enforcement measures (requiring funding) are essential ancillary measures to support the CAZ.</p> <p>Suggest rapid charging points at Park & Ride sites rather than in the city centre. City centre charging for essential vehicles only. However focus should be on deterring cars from entering the city centre.</p> <p>Support incentives for non-compliant van drivers to use Park & Ride sites.</p> <p>Reinvestment of money needs to include provision for those less able to travel sustainably. More focus on public transport, as well as walking and cycling. Support investment in Park & Ride and school transport.</p> <p>Contingency plan - need for robust monitoring and evaluation of the performance of the scheme, alongside a willingness to review and alter the scheme as early as possible should the real-world performance differ significantly from the business case.</p> <p>Potential new developments – large car park on Recreation Ground inside the CAZ, if approved, will add substantially to parking capacity.</p> <p>Need to reduce and eventually remove heavy vehicles – weight restriction reinstated on Cleveland Bridge.</p> <p>Low Traffic Neighbourhoods – support the principle in residential parts of the city. Potential for later introduction.</p>
Questionnaire	<p>Concern that Queen Square proposals will displace traffic to Cavendish Road, Marlborough Buildings and Julian Road. Request that mitigation is put in place at the same time as the Queen Square scheme. Suggest creation of a Low Traffic Neighbourhood to include Cavendish Road, bollards on Cavendish Road (as at the end of the Royal Crescent), build outs or a fixed speed camera.</p>
Questionnaire, Email & Letter	<p>Would like to see Sydney Buildings, Horseshoe Walk, The Tynning and Church Street included in the zone.</p> <p>Support the CAZ.</p> <p>Concern over the current proposed placement of CAZ warning signs, in that they will not act as a deterrent. U-turning vehicles will create a dangerous situation on Bathwick Hill.</p>
Questionnaire	<p>Wholeheartedly endorse the decision to extend the CAZ area.</p> <p>Approve of signage proposals.</p>
Letter	<p>Support for Class D CAZ, rather than C, as it provides means for quicker reduction in pollution levels.</p> <p>Welcome the revised boundary, particularly inclusion of Pulteney Estate. Concern over the displacement of traffic resulting from Queen Square proposals. Lack of wider vision/strategy for managing traffic in the city centre.</p> <p>Concern over enforcement of weight limits and other motoring regulations, as historically B&NES have not managed to enforce the current limits successfully. Commitment to monitoring of the scheme and enhancement of CAZ regulatory framework and boundaries if monitoring shows it is failing to meet objectives. Welcome any proposals to increase capacity of Park & Ride, particularly to the east of the city.</p> <p>Remain unconvinced as to advice services and apps for public transport measures and would welcome concrete proposals to improve the amount and affordability of public transport.</p>

Table C5: Feedback from local, parish and town councils

Via	Overview of Comments
	Local Councils
Questionnaire	Emphasises the importance of working with Wiltshire Council to monitor and assess the impact on Wiltshire communities and road networks, assisting local businesses where appropriate.
Questionnaire	<p>Welcome change to a Class C. However, concerned that there is insufficient detail on work that has been done on the routing of non-compliant traffic around Bath.</p> <p>Concern that the most polluting traffic travelling from the south to the M4 will divert around the east of Bath, moving air quality problems into these areas. More information is needed on how B&NES will work with neighbouring authorities to mitigate this.</p> <p>Concern also about how sat nav systems interact with the zone - there seems to be a risk that all systems that are set to "Avoid Tolls", regardless of the compliance status of the vehicles, will divert traffic around the zone. This could exacerbate the traffic being sent into neighbouring authorities. This is particularly a concern for communities such as Limpley Stoke and Winsley, which will be the last toll-free crossing point of the Avon for all traffic trying to link from the A36 to the M4 (and vice versa).</p> <p>Emphasise need for appropriate signage to ensure traffic does not take inappropriate routes.</p> <p>Support for bus upgrades important to avoid services being cut or costs being passed to customers.</p>
	Individual Parish & Town Councils
Questionnaire & Email	Welcome the change from Class D to C and the boundary change and believe the inclusion of the bottom of North Road will discourage HGVs that would otherwise route through the village.
Questionnaire	Wish to understand the overall costs of signage, camera placement and maintenance.
Questionnaire	<p>Support the principle of improving air quality for all but are concerned that the proposals for Bath will shift the problem outside the City.</p> <p>Holt's neighbourhood plan aims to reduce HGV traffic through the village.</p> <p>Encourage further engagement with Wiltshire to ensure fairness across the region.</p>
Questionnaire	<p>Keynsham Town Council support the change from a Class D to a Class C charging clean air zone.</p> <p>The Council feel this ensures that less affluent residents of Bath, Keynsham and the surrounds will still be able to attend their places of work and the RUH without incurring significant extra expenditure.</p>
Questionnaire	Melksham Without Parish Council support Wiltshire Council in their objections to the Clean Air Zone scheme as this will result in traffic taking an alternative route through West Wiltshire.
Questionnaire & Letter	Urge the Council to look again at a Park and Ride for the east of Bath. Remain concerned about the impact of increased traffic (including HGVs) on outlying communities, in particular on the A363.
Letter	<p>Support Class C as an improvement to the original scheme.</p> <p>Concern over rerouting of traffic and ongoing monitoring to ensure impacts are identified and addressed.</p> <p>Alternative scheme suggestion includes reopening of Saltford Station to encourage mode shift for Saltford residents travelling into or through Bath.</p>
Email	<p>Supports measures to improve air quality, welcomes Class C (in excluding private cars).</p> <p>Concerned about diverting vehicles to avoid charges, with the B3108 (Winsley bypass) becoming the last toll-free crossing.</p> <p>Essential the link is retained for the D1 bus service linking residents with work, school and social opportunities in Bath, with no reduction in service or increase in fares as a result of charging buses.</p>

Table C6: Feedback from schools

Via	Overview of Comments
	Organisations
Letter	<p>Welcomes measure to reduce poor air quality.</p> <p>Concerned Bathampton is knowingly being allowed to become a rat run to the East for non-compliant taxis and vans. Detrimental impact on air quality and congestion/safety. Concern that the village's situation is not been taken sufficiently seriously. Why not included in the CAZ, with ANPR cameras proposed for the area to monitor traffic, but not part of the CAZ.</p> <p>Concern that modelling undertaken for the CAZ has not been done to understand impact on overloading junctions in Bathampton.</p> <p>Concern over HGVs following sat nav and trying to cross toll bridge but having to attempt to turn around. Impact on safety.</p> <p>Unhappy at the amount of notice about consultation events.</p>
Questionnaire	<p>Would like to see exemption for school buses (for bringing pupils in and for trips/sports)</p> <p>Concern that traffic may use North Road and Cleveland Way to avoid the CAZ.</p> <p>Note that the school would suffer if a Class D CAZ were ever introduced in the future.</p>
Questionnaire	Consider the proposal will have a negative impact on air quality around St Andrews Church School.

Table C7: Feedback from other local organisations

Via	Overview of Comments
	Organisations
Questionnaire	Concerned about the potential re-routeing of HGVs through Bradford on Avon.
Questionnaire	Consider that the work to date underestimates the likelihood of non-compliant vehicles routeing via Bradford on Avon.
Questionnaire	Call for charities with minibuses (such as scout groups) to be exempt. Concern that the CAZ charge would impact their ability to offer activities to children in Bath.