

Cabinet

Date: Thursday, 16th January, 2020
Time: 7.00 pm (or 30 minutes after the conclusion of the Special Council meeting)
Venue: Council Chamber - Guildhall, Bath

Agenda

To: All Members of the Cabinet

Councillor Dine Romero (Council Leader and Liberal Democrat Group Leader), Councillor Rob Appleyard (Cabinet Member for Adult Services), Councillor Tim Ball (Cabinet Member for Housing, Planning, and Economic Development), Councillor Neil Butters (Cabinet Member for Transport Services), Councillor Paul Crossley (Cabinet Member for Community Services), Councillor Kevin Guy (Cabinet Member for Children's Services), Councillor Richard Samuel (Deputy Council Leader and Cabinet Member for Resources), Councillor Sarah Warren (Cabinet Member for Climate Emergency and Neighbourhood Services), Councillor David Wood (Cabinet Member for Climate Emergency and Neighbourhood Services) and Councillor Joanna Wright (Cabinet Member for Transport Services)

Chief Executive and other appropriate officers
Press and Public

The agenda is set out overleaf.



Jack Latkovic

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NOTES:

1. **Inspection of Papers:** Papers are available for inspection as follows:

Council's website: <https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1>

Paper copies are available for inspection at the Guildhall - Bath.

2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

3. **Recording at Meetings:-**

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control. Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators. We request that those filming/recording meetings avoid filming public seating areas, children, vulnerable people etc; however, the Council cannot guarantee this will happen.

The Council will broadcast the images and sounds live via the internet www.bathnes.gov.uk/webcast. The Council may also use the images/sound recordings on its social media site or share with other organisations, such as broadcasters.

4. **Public Speaking at Meetings**

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group. They may also ask a question to which a written answer will be given. **Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.** Further details of the scheme:

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942>

5. **Emergency Evacuation Procedure**

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are signposted. Arrangements are in place for the safe evacuation of disabled people.

6. **Supplementary information for meetings**

Additional information and Protocols and procedures relating to meetings

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505>

Cabinet - Thursday, 16th January, 2020

in the Council Chamber - Guildhall, Bath

AGENDA

1. WELCOME AND INTRODUCTIONS

2. EMERGENCY EVACUATION PROCEDURE

The Chair will draw attention to the emergency evacuation procedure as set out in the Notes

3. APOLOGIES FOR ABSENCE

4. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

(a) The agenda item number in which they have an interest to declare.

(b) The nature of their interest.

*(c) Whether their interest is **a disclosable pecuniary interest** or **an other interest**, (as defined in Part 2, A and B of the Code of Conduct and Rules for Registration of Interests)*

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

5. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

6. QUESTIONS FROM PUBLIC AND COUNCILLORS

Questions submitted before the deadline will receive a reply from an appropriate Cabinet member or a promise to respond within 5 days of the meeting. Councillors may ask one supplementary question for each question they submitted, up to a maximum of two per Councillor.

7. STATEMENTS, DEPUTATIONS OR PETITIONS FROM PUBLIC OR COUNCILLORS

Councillors and members of the public may register their intention to make a statement if they notify the subject matter of their statement before the deadline. Statements are limited to 3 minutes each. The speaker may then be asked by Cabinet members to answer factual questions arising out of their statement.

8. MINUTES OF PREVIOUS CABINET MEETING (Pages 7 - 14)

To be confirmed as a correct record and signed by the Chair

9. CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET

This is a standard agenda item, to cover any reports originally placed on the Weekly

list for single Member decision making, which have subsequently been the subject of a Cabinet Member requisition to the full Cabinet, under the Council's procedural rules

10. MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

This is a standing agenda item (Constitution rule 14, part 4D – Executive Procedure Rules) for matters referred by Policy Development and Scrutiny bodies. The Chair of the relevant PDS Panel will have the right to attend and to introduce the Panel's recommendations to Cabinet.

11. SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING (Pages 15 - 18)

A list of Cabinet Single Member decisions taken and published since the last Cabinet meeting to note (no debate).

12. BATH'S CLEAN AIR PLAN- FULL BUSINESS CASE (Pages 19 - 374)

Poor air quality is the largest known environmental risk to public health in the UK. 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 the wider B&NES area, 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.

This report provides a further update on the report in September 2019 and sets out the decisions required to progress the project.

13. B&NES LOCAL DEVELOPMENT SCHEME REVIEW (Pages 375 - 380)

This report seeks the agreement of Cabinet to delegate authority to officers to revise the Bath & North East Somerset Local Development Scheme (LDS) in order to establish the priorities for the preparation of Planning Policy documents for the period 2020-2023 and enable a review of the Council's planning policies to respond to the Climate and Nature emergency.

14. INTEGRATED TRANSPORT AUTHORITY (Pages 381 - 386)

The West of England Combined Authority (WECA) Order 2017 transferred to the Combined Authority responsibility for certain public transport functions. This report provides an update on the work to transfer the specified functions from this organisation to WECA

15. MEAD LANE MOORINGS (Pages 387 - 584)

As landowners, the Council is responsible for a stretch of riverbank adjacent to Mead Lane, Saltford. The Council introduced a 12-month mooring trial in November 2016 following discussions with the local community. The purpose of this report is to provide an update on the trial; consider the feedback received from communities and partners and agree the next steps.

16. HOMELESSNESS & ROUGH SLEEPING STRATEGY 2019/24 (Pages 585 - 618)

The Homelessness Act 2002 requires the Council to carry out a review of homelessness to inform the production of a homelessness strategy every 5 years. The Homelessness & Rough Sleeping Strategy 2019-24 meets this requirement

17. CLAVERTON NEIGHBOURHOOD DEVELOPMENT PLAN (Pages 619 - 622)

Following the successful examination and referendum, this report seeks to make and bring into force the Claverton Neighbourhood Plan (Appendix 1), so that it will be used by the Local Planning Authority to help determine planning applications within the Neighbourhood Area.

Claverton Parish Council is the qualifying body authorised to act in relation to the Neighbourhood Plan.

18. DECISION TO COMPLETE A TRANSFER AGREEMENT WITH AEQUUS COMPANIES (Pages 623 - 728)

To approve the agreement to transfer staff and resources to the Council's housing development companies and provide a pension guarantee.

The Committee Administrator for this meeting is Jack Latkovic who can be contacted on 01225 394452.

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These minutes are draft until confirmed as a correct record at the next meeting.

BATH AND NORTH EAST SOMERSET

CABINET

Thursday, 7th November, 2019

Present:

| | |
|---------------------------|---|
| Councillor Dine Romero | Council Leader and Liberal Democrat Group Leader |
| Councillor Rob Appleyard | Cabinet Member for Adult Services |
| Councillor Tim Ball | Cabinet Member for Housing, Planning, and Economic Development |
| Councillor Neil Butters | Cabinet Member for Transport Services |
| Councillor Paul Crossley | Cabinet Member for Community Services |
| Councillor Kevin Guy | Cabinet Member for Children's Services |
| Councillor Richard Samuel | Deputy Council Leader and Cabinet Member for Resources |
| Councillor Sarah Warren | Cabinet Member for Climate Emergency and Neighbourhood Services |
| Councillor David Wood | Cabinet Member for Climate Emergency and Neighbourhood Services |
| Councillor Joanna Wright | Cabinet Member for Transport Services |

30 WELCOME AND INTRODUCTIONS

The Chair welcomed everyone to the meeting.

31 EMERGENCY EVACUATION PROCEDURE

The Senior Democratic Services Officer drew attention to the evacuation procedure as set out in the Agenda.

32 APOLOGIES FOR ABSENCE

There were no apologies for absence.

33 DECLARATIONS OF INTEREST

During the debate on agenda item 16 Council House Building Programme Update the Council Leader declared an other interest in this item as she is the Council's shareholder representative for Aequus Development Limited. The Council Leader would abstain from debating and voting on this item.

34 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

There was none.

35 QUESTIONS FROM PUBLIC AND COUNCILLORS

There were 8 questions from Councillors and 2 questions from members of the public.

[Copies of the questions and responses, including supplementary questions and responses if any, have been placed on the Minute book at Democratic Services and are available on the Council's website.]

36 STATEMENTS, DEPUTATIONS OR PETITIONS FROM PUBLIC OR COUNCILLORS

Robin Kerr made a statement (attached as Appendix to these Minutes) about two recommendations from the LGA Peer Review.

Councillor Shaun Hughes presented to the Cabinet a suggestion/idea for Somer Valley mass transport solution.

The Council Leader and Councillor Neil Butters (Cabinet Member for Transport Services) thanked Councillor Hughes for his statement and said that they would consider this matter after the General Election.

Councillor Sarah Moore made a statement about student purpose built accommodations where she invited the Cabinet to take action against those property developers who may take advantage of demand, and overcharge students with the rent fees. Councillor Moore expressed her concern that, for those reasons, social housing could be put in jeopardy.

Councillor Tim Ball (Cabinet Member for Housing, Planning, and Economic Development) thanked Councillor Moore for her statement and invited her to discuss different policies related to this matter.

Councillor Eleanor Jackson presented a petition asking the Cabinet to reconsider closure of 11 children's community playgrounds. Councillor Jackson read out a statement in support of the petition (attached as Appendix to these Minutes).

Councillor Paul Crossley (Cabinet Member for Community Services) said that 11 children's playgrounds have not been closed. Some of them have been re-purposed. The Council would be looking to imaginative playgrounds by providing new play area equipment so that a range of children could use these facilities (such as the first wheelchair friendly roundabout). In some instances the Council would consider working with Town and Parish Councils. Councillor Crossley also said that there has been consultation with a wide range of people and no decisions have been made yet.

Councillor Richard Samuel (Cabinet Member for Resources) said that the Council would be spending £325,000 on improvement of play facilities in this financial year.

Councillor Eleanor Jackson added that residents may not be aware of the future spending on improvement of play areas and suggested better communication with the residents.

37 MINUTES OF PREVIOUS CABINET MEETING

RESOLVED that the minutes of the meeting held on Thursday 12th September 2019 be confirmed as a correct record and signed by the Chair.

38 CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET

There were none.

39 MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

There were none.

40 SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING

The Cabinet agreed to note the report.

41 REVENUE AND CAPITAL BUDGET MONITORING, CASH LIMITS AND VIREMENTS - APRIL 2019 TO SEPTEMBER 2019

Councillor Richard Samuel introduced the report by taking the Cabinet through the Executive summary of the report.

Revenue budget

The Revenue budget outturn was forecast to be £0.08m under budget, which was a favourable movement of £1.76m from Quarter 1.

Nevertheless, there continues to be further adverse movements in service revenue budgets; key areas of risk were additional demand in Children's Services £0.84m, and £0.35m shortfall in income from the Councils Housing Delivery Vehicle. The Children's Services budget has a forecast £1.9m over budget position after 2019/20 budget rebasing; this was due to increases in specialist Health and Social Care placements. Also, Commercial Estate income has not increased in line with budgeted income levels due to a slowing down of high street retail income and fewer acquisition options creating a £1m budget pressure. Across all portfolios the forecast over budget position excluding corporate budgets was £2.68m.

This adverse position has been mitigated by a £2.76m favourable forecast on the Councils Corporate Budgets largely attributable to an under budget position on capital financing from re-phasing of capital expenditure and lower than budgeted cost of capital from beneficial interest rates for borrowing.

Of the overall savings target for 2019/20 of £8.9m, £0.9m (10%) would not be delivered and would impact on the 2020/21 budget; £5.1m (57%) was forecast to be delivered by the year-end, and £2.9m (33%) has been delivered. To provide mitigation to delays in delivering savings and over budget areas Directors have put cost reduction plans in place to minimise spend wherever possible, which would further improve the year-end position. These would need to continue to be reviewed to ensure that the Council remains within the approved budget by the year-end.

Capital budget

The capital budget was currently showing an expected under budget position of £34.6m mainly due to re-phasing of Bath Quays, ACL/ADL loan drawdowns and Roman Baths Archway Project into future financial years to reflect revised project spend profiles.

Following a review of the Modern Library programme options for Central Bath, which were paused last year, it has been proposed not to proceed with the remodelling of the Podium site and closure of the existing one stop shop in Manvers Street due to financial viability. The Modern Libraries project has saved £0.45m in recurring savings to date but the further £0.35m outlined in the Medium Term Financial Plan for 2020/21 would no longer be delivered and would be reflected in next year's budget. The Capital Programme would be adjusted as a result to remove the £3m allocated to the scheme. Capital spend to date of £0.362m would revert to revenue and would be funded from the Capital Financing Reserve

Council Tax and Business Rates

The current forecast Council's share of the year end Collection Fund position was:

- Council Tax – Surplus of £0.82m (2018/19 Surplus £0.69m)
- Business Rates – Surplus of £1.21m (2018/19 Surplus £0.76m)

Council Reserves

The current forecast revenue position would not require use of the Budget Contingency Reserve (which was set up to mitigate budget risk). The Council's reserve levels would continue to be monitored during the remainder of the financial year.

Councillor Richard Samuel thanked the officers who prepared the report

Councillor Richard Samuel moved the recommendations.

Councillor Dine Romero seconded the motion by saying that she was delighted that Public Libraries scheme would be abandoned. Councillor Romero also thanked the officers who prepared the report.

RESOLVED (unanimously) that the Cabinet agreed to:

- 2.1 To note the 2019/20 forecast under budget of £0.08m (as at the end of September 2019) and the recovery plan actions outlined in Appendix 1;
- 2.2 To note that Recovery Plans are in place and these will continually be reviewed to ensure that the Council remains within the approved budget;
- 2.3 To approve the revenue virements listed for approval in Appendix 3(i) and to note those virements listed for information only;
- 2.4 To note the capital year-end forecast detailed in paragraph 3.14 of this report;
- 2.5 To note the changes in the capital programme including capital schemes that have been agreed for full approval under delegation listed in Appendix 4(i);
- 2.6 To approve the removal of £3.0m provisional capital scheme for Modern Libraries relating the Podium re-modelling as an integrated Library and One Stop Shop;
- 2.7 To note that the associated one-off revenue reversion costs of £0.362m of the Library scheme will be funded from the Capital Financing Reserve;
- 2.8 To note that the remaining savings target of £0.35m for the Modern Libraries programme will be removed as part of the 2020/21 revenue budget proposals.

Councillor Richard Samuel introduced the report by saying that this was a regular report that the Cabinet have received in accordance with CIPFA code of guidance for the first 6 months of this financial year.

Councillor Samuel said that borrowings have remained well within Prudential limits that the Council has set; the credit rating was at AA, which was above the benchmark of A- ; £61m have been invested by the Council; investments in money market funds have increased in the last quarter by £9.4m due to re-investment. Overall, the performance has remained sound against the benchmarks.

Councillor Richard Samuel moved the recommendations subject to changes in recommendation 2.3 which should read: 'This Treasury Management Report and attached appendices are reported to the next meeting of the Full Council and Corporate Audit Committee.'

Councillor Neil Butters seconded the motion by welcoming the comprehensive report from officers.

RESOLVED (unanimously) that the Cabinet agreed to:

2.1 The Treasury Management Report to 30th September 2019, prepared in accordance with the CIPFA Treasury Code of Practice, is noted.

2.2 The Treasury Management Indicators to 30th September 2019 are noted.

2.3 This Treasury Management Report and attached appendices are reported to next meetings of the Full Council and Corporate Audit Committee.

43 LGA PEER REVIEW ACTION PLAN

Will Godfrey (Chief Executive) said that the LGA Peer Review process was really important for the Council to get some external perspective on how the organisation was performing. There were some really strong and positive messages in the report about performance frameworks, Medium Term Financial Plan, and those were the issues that the Council should be focused on getting them right. Will Godfrey also said that the Council should embrace positively the recommendations in the report over the next few months.

Councillor Dine Romero introduced the report by saying that she was grateful to have this review with this administration as a baseline to develop and build Council's commitment to its residents, which includes better engagement with residents. The action plan would need a proper 'buy-in' from officers of the Council and also from all elected Members of the Council. The LGA Peer Review team identified quite a few strengths which the Council can be proud of. Councillor Romero thanked the LGA Team for their hard work for producing a fair assessment.

Councillor Dine Romero moved the recommendations.

Councillor Paul Crossley seconded the motion by saying that the LGA process had started over a decade ago, and it had become a real part of Local Government. As a Council we should be proud that many of B&NES Councillors have become LGA Peer reviewers and have participated in reviews of other Councils. This reflected credit on all Councillors in B&NES. Councillor Crossley highlighted the engagement of 3rd sector and volunteers in everyday life of B&NES, such as litter picking and maintenance by Friends of Henrietta Park group.

Councillor Richard Samuel said that this was a good report with a message that this was a well-run Council although there were some areas where the Council could improve. Councillor Samuel also said that it was always difficult when the administration of the Council change, and aspirations have to adjust, but many things continue to operate such as day to day services to residents.

Councillor Eleanor Jackson commented that residents suggested that Fix My Street did not work, and she asked if that could be looked at.

Councillor Neil Butters said Fix My Street issues had been picked up and it should be sorted shortly.

Councillor Dine Romero added that aspirations of the new administration would depend on available resources and funding.

RESOLVED (unanimously) that the Cabinet agreed to:

2.1 Endorse the recommendations outlined in the LGA Peer Report and agree for the report and action plan to be published on the Councils Website;

2.2 Agree to receive a six monthly monitoring report on progress against the Action Plan as outlined in Annex B;

2.3 Agree to invite the LGA Peer Review team back or a follow up visit in the summer of 2020 to review progress.

44 HOMELESSNESS & ROUGH SLEEPING STRATEGY (2019-2024) UPDATE

Councillor Tim Ball introduced the report by saying that this was a draft report which would return to the Cabinet in January 2020 for adoption. The relevant PDS Panel would have the opportunity to scrutinise this strategy.

Councillor Ball also said that Comments received about people resorting to living on the waterways as an alternative to rough sleeping or other forms of homelessness have been received. This was an area for further investigation, which was already being looked at and would be included in the updated action plan. A query has been raised about female-specific one-stop advice support and training provision along the lines of the Nelson Trust in Wiltshire and Gloucestershire. Provision in that service has included housing and accommodation, prison in-reach, employment & training, prevention of child sexual exploitation and sex-working. Cross-directorate (Housing, Community Safety, Equalities, Children & Families) and multi-agency (Voluntary Sector, Offender Management) discussions were needed to look at the gaps such a service might fill and, if agreed that it would be of benefit, how financial resources might be found. The Nelson Trust has been receiving funding from a range of national and local sources and a similar approach would need to be taken in Bath & North East Somerset. It should be noted that local services were already offering support and advice on these issues, albeit not in one venue. Funding for 2020/21 for rough sleeping services was yet to be confirmed but assurances have been recently given that similar levels of funding could be expected. A business plan has been submitted to MHCLG setting out how this would be spent and a response was expected imminently. Further underwriting of day services to ensure rough sleepers have somewhere to go at any point of the day was also being considered by MHCLG.

Councillor Ball invited all Members of the Council to get engaged and comment on the new Homelessness and Rough Sleeping Strategy before the next Cabinet meeting on 16th January 2020.

Councillor Tim Ball moved the recommendations.

Councillor Kevin Guy seconded the motion by encouraging as many people as possible to take part in the consultation. Councillor Guy also said that he has had pleasure of seeing officers from this Council and other organisations helping people. Councillor Guy added that sofa surfing, in particular with young children, was something that was overlooked in the report.

Councillor Richard Samuel said that it should be our aim to remove homelessness and rough sleeping from our authority, and house all of our citizens. Our aspirations should be ambitious – nobody in 2019 should be without a roof over their head, and we must do everything we can to help people.

Councillor Dine Romero agreed that the Council must ensure that nobody in B&NES should be without a roof over their head.

RESOLVED (unanimously) that the Cabinet agreed to note the current consultation exercise and approach in regard to tackling homelessness and the priorities set out in the draft document.

45 COUNCIL HOUSE BUILDING PROGRAMME UPDATE

Councillor Tim Ball said that this was a high level report and a more detailed report would come to future Cabinet and Council meetings. The programme would enable Council to have greater control over the homes being delivered, including:

- design and environmental standards, (eg carbon neutral)
- rent, (eg social rent)
- allocations and management. (eg greater control over who goes in)

Councillor Ball also said that after considering various options it was decided to investigate further the option to register with Homes England as a “developing Registered Provider”. This approach has had a number of benefits, including being able to access Government funding for affordable housing. The Council would commission independent advice on financial, legal and operational matters. Any established Registered Provider would work in partnership with ADL/ACL (who would take Council sites forward) with the resultant affordable housing being kept by the Registered Provider. The Council would be looking at some other options which may help local residents with housing, including shared-ownership schemes; equity partnership schemes and using empty properties for local cost rent.

Councillor Tim Ball moved for report to be noted.

Councillor Rob Appleyard seconded the motion by saying that thousands of people were looking to move into permanent homes which would not only help their health and wellbeing but also their children and families.

Councillor Richard Samuel said that this report has shown that good progress has been made in terms of the Council House Building Programme, and that he was looking forward for the Council having greater control over the homes being delivered.

The Cabinet noted the high-level programme plan and the options shortlisted for further investigation and detailed analysis.

NOTE: Councillor Dine Romero abstained from voting.

The meeting ended at 7.30 pm

Chair _____

Date Confirmed and Signed _____

Prepared by Democratic Services

Bath & North East Somerset Council

Cabinet Single-Member Decisions and Responses to Recommendations from PDS Panels

published 28-Oct-2019 to 6-Jan-2020

Further details of each decision can be seen on the Council's Single-member Decision Register at <http://democracy.bathnes.gov.uk/mgDelegatedDecisions.aspx?&dm=3>

School funding Formula 2020-21

To decide on the changes required to the School funding formula for the 2020-21 financial year.

Decision Maker: Cabinet Member for Children's Services

Decision published: 06/01/2020

Effective from: 14/01/2020

Decision:

The Cabinet Member agrees:

1. To set the Minimum Funding Guarantee at +1.84% change in pupil funding in 2020-21 compared to 2019-20
2. That the LA will not set a Cap on Gains for 2020-21
3. That the LA increase the 2020-21 local formula funding core factor values as close as it can to the 4% (set out in DFE Guidance) except for the free school meals factor which will be increased at inflation (defined by the DFE)
4. That the LA use the NFF methodology to calculate mobility in the local formula for 2020-21

Wards affected: (All Wards);

Lead officer: Richard Morgan

Asset transfer of Peasedown St John Youth Hub

Proposal to lease Peasedown St John Youth Hub to St John's Church, Peasedown St John, for 30 years under the Community Asset Transfer policy.

Decision Maker: Cabinet Member for Resources

Decision published: 13/12/2019

Effective from: 21/12/2019

Decision:

The Cabinet Members agree that:

1. The Head of Property Services be authorised to enter into a 30 year lease of Peasedown St John youth hub with the Parochial Church Council of St John's Church, Peasedown St John;
2. The lease will reserve a market rent which is abated to nil, subject to the tenant satisfying the landlord that the conditions set out in the agreed Service Level Agreement, including the provision of open access positive activities for young people, will be fulfilled for the full term of the lease.

Wards affected: Peasedown;

Lead officer: Sally Churchyard

Surrender of Lease and Payment of Reverse Premium - 23 Grosvenor Place, London Road, Bath

It seeks approval to the agreement to surrender the existing occupational lease at the subject property, subject to payment of a reverse premium by the Council to the tenant.

Decision Maker: Cabinet Member for Resources

Decision published: 13/12/2019

Effective from: TBC

Decision:

The Cabinet Member agrees to authorise approval to surrender the tenant's lease dated 2nd February 1993 between Bath City Council and the tenant for a term expiring 1 February 2058.

Subject to the following conditions:

- Vacant possession
- The tenant using best endeavours to provide vacant possession at the earliest opportunity.
- Payment of a reverse premium by BANES to the tenant on completion of the surrender

Wards affected: Walcot;

Lead officer: Glenn Chinnock

Appointment of two Non Executive Directors to the Board of Aequus Developments Ltd

To agree the appointment of two non-executive directors to the Board of Aequus Developments Ltd.

Decision Maker: Council Leader

Decision published: 14/11/2019

Effective from: 14/11/2019

Decision:

The Cabinet Member agrees that:

Michelle Hyde be appointed a non-executive director of Aequus Developments Limited with effect from 1 December 2019.

Alexander Wright be appointed a non-executive director of Aequus Developments Limited with effect from 1 December 2019.

Lead officer: Martin Shields

Neighbourhood Community Infrastructure Levy for Bath Round 6

The request for the sum of £22,000 to be agreed for the latest round (6) of recommendations for the neighbourhood spending of CIL for Bath.

Decision Maker: Council Leader

Decision published: 11/11/2019

Effective from: 19/11/2019

Decision:

The Cabinet Member agrees that funding be provided from Neighbourhood CIL Project Funding for Bath:

£5,000 for application BA-068, a contribution towards the installation of a handrail at the end of Widcombe Parade, Bath, an uplift to the Transport Improvement programme

£15,000 for application BA-066, a contribution for the provision of Solar Street Lighting in Highland Terrace, Bath, an uplift to Transport Improvement Programme

£2,000 allocation from the Bath CIL neighbourhood allocation for application BA-053, Parade Gardens Bandstand (the sum agreed in the previous SMD E3138 agreed £12,300 in funds, this was understated, there was agreement for a contribution for £14,300 – moving this sum to full Approved from Bath Park s106 / CIL Projects in Customer Services Portfolio.

Wards affected: Kingsmead; Westmoreland; Widcombe & Lyncombe;

Lead officer: Mark Hayward

Proposed Asset Transfer of the Cleveland Pools to the Cleveland Pools Trust at Less Than Best Consideration

Authority to enter into a lease with the Cleveland Pools Trust.

Decision Maker: Cabinet Member for Resources

Decision published: 29/10/2019

Effective from: 06/11/2019

Decision:

The Cabinet Member agrees that the disposal to the Cleveland Pools Trust at less than best consideration can proceed.

Wards affected: Bathwick;

Lead officer: Hayley Ponsford

| Bath & North East Somerset Council | | |
|--|--|-----------------------------------|
| MEETING: | Cabinet | |
| MEETING DATE: | 16th January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3175 |
| TITLE: | Bath Clean Air Plan FBC Submission – January 2020 | |
| WARD: | All | |
| AN OPEN PUBLIC ITEM | | |
| <p>List of attachments to this report:</p> <p>Appendix 1- Main FBC document</p> <p>Appendix 2- Scheme boundary</p> <p>Appendix 3- Latest version of the Communications Strategy</p> <p>Appendix 4- FBC 25c- Consultation Report</p> <p>Appendix 5- Equalities Impact Assessment</p> <p>Appendix 6- Draft Charging Order Annex 5 (application of the net proceeds)</p> | | |

1 THE ISSUE

1.1 Poor air quality is the largest known environmental risk to public health in the UK. 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 the wider B&NES area, 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.

1.2 This report provides a further update on the report in September 2019 and sets out the decisions required to progress the project.

2 RECOMMENDATION

The Cabinet is asked to:

2.1 Delegate authority to the Corporate Director of Place to formally submit to the government's Joint Air Quality Unit (JAQU) for approval: the final Full Business Case (FBC), Clean Air Fund (CAF) bid; and the Charging Order. The main FBC is attached as Appendix 1 and the full package of

documents have been shared with Cabinet members and are published on the Council's website.

- 2.2 Agree the key project programme milestones as shown in Section 3.5.
- 2.3 Agree the revised and final scheme boundary as shown in Appendix 2.
- 2.4 Note that a draft Communications Strategy has been developed to support the implementation of the scheme that integrates with the national communications campaign. This is set out in Appendix 3.
- 2.5 Consider the FBC Consultation Report setting out the views of the respondents to the last public consultation and analysis of these views. This is set out in Appendix 4.
- 2.6 Confirm the launch of the approved scheme on 4 November 2020. This is the date upon which enforcement will commence and payment must be made for entering the Clean Air Zone (CAZ) in a non-compliant vehicle or be subject to enforcement via a penalty charge notice (PCN).
- 2.7 Note the recommendations of the independent review which have been incorporated into the FBC.
- 2.8 Note the changes made by JAQU as part of the core scheme since the end of the last public consultation.
- 2.9 Consider the updated Equalities Impact Assessment (EqIA) shown in Appendix 5.
- 2.10 Note that a meeting of the Climate Emergency and Sustainability Policy Development and Scrutiny Panel is planned to take place on 13th January 2020 and any recommendations will be subsequently reported to the Cabinet Member for Climate Emergency and Sustainability.
- 2.11 Delegate authority to the relevant Corporate Director and the Director of Legal and Democratic Services and the S151 Officer, in consultation with the Cabinet member for Climate Change and the Deputy Leader, the decision to agree and to enter into any relevant legal agreement to secure, the national operational agreement(s) for the operation of the Clean Air Zone.
- 2.12 Delegate authority to the relevant Corporate Director and the Director of Legal and Democratic Services, in consultation with the Cabinet member for Climate Change and the Deputy Leader, the decision to agree and make minor changes to the Clean Air Zone Charging Order for technical reasons before sealing.
- 2.13 Note that if the Council does not secure sufficient funds from DEFRA/DfT then the Council reserves the right to review the proposals as set out in this report to ensure that there is no impact on the Council's wider budget.

3 THE REPORT

- 3.1 Following the successful submission of the Outline Business Case (OBC) to JAQU and subsequent approval by the Minister, the Council has been progressing the development of the FBC taking into account the feedback which has been received to date and, subject to final approval, preparing to implement the scheme.
- 3.2 The FBC updates the OBC by providing a fully costed model for the final scheme based on prices from contractors, and reflects the changes made in light of the independent peer review and the responses to the public consultation in autumn 2019.
- 3.3 Once agreed by Cabinet, officers will submit the FBC to JAQU for final approval by the Minister, with a view to ensuring that the infrastructure is in place to enforce the scheme as of 4 November 2020. This is the date from when non-compliant vehicles will be charged to enter the CAZ.
- 3.4 Following the OBC stage it has been necessary to make a further amendment to the scheme boundary for technical reasons in consultation with local councillors and residents. This involved extending the boundary 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.

- 3.5 The key milestones for the project are shown below:

| | |
|--|-------------------|
| Cabinet approval of the Full Business Case (FBC) | 16 January 2020 |
| Joint Air Quality Unit (JAQU) sign off | 14 February 2020 |
| Bus upgrade scheme opens for applications | 17 February 2020 |
| Financial assistance scheme opens for applications | 17 February 2020 |
| Secretary of State sign off | 13 March 2020 |
| Queen Square traffic management scheme complete | 24 April 2020 |
| Signage infrastructure (below ground) complete | 19 June 2020 |
| Back office infrastructure complete | 23 July 2020 |
| ANPR camera infrastructure complete | 30 July 2020 |
| Signage infrastructure (above ground) complete | 30 September 2020 |
| System integration and testing complete | 30 September 2020 |
| Baseline monitoring complete | 2 November 2020 |
| CAZ commencement | 4 November 2020 |

This shows the phasing of the works to deliver the scheme on time for launch in November 2020.

3.6 Following recommendations outlined in the independent peer review, the FBC has been updated to include:

- A revised Air Quality Report (FBC 11) to identify where gradient adjustments were applied;
- A revised Sensitivity Testing Report (FBC 31) incorporating updated sensitivity tests of the CAZ C and CAZ D scenarios, with the same gradient adjustment factors being applied to diesel cars as to LGVs and HGVs;
- A revised Monitoring and Evaluation Plan (FBC 26) including interventions in the event that implementation of the preferred option fails to achieve compliance at all locations.

3.7 As the national picture evolves, JAQU are working with all local authorities to develop the final scheme detail. As a result of these continued discussions, changes continue to be made to the core scheme requirements. These include:

- Increasing the post-entry payment window from midnight of the next working day until midnight of the 7th calendar day following entry into the CAZ;
- The mechanisms for operating exemptions and concessions;
- The provision of a central helpdesk for all CAZ's, providing the ability to pay by telephone in addition to the online payment portal.

These changes are outside of the Council's control and the scheme will need to be adapted to accommodate the evolution of the national scheme requirements.

3.8 To allow a Class C Clean Air Zone to deliver the required compliance with EU Limit Values, a restriction needs to be placed on traffic flows through Queen Square. As well as ensuring compliance the scheme also provides benefit to both cyclists and pedestrians with improved crossing facilities and provides an important step towards a wider improvement project to enhance the public realm within the area, which will come forward for consultation at a later date.

3.9 The recent public consultation has highlighted concerns about diversionary impacts and the potential deterioration in air quality (although not exceeding EU Limit Values) created by the Queen Square scheme. The areas mentioned in the responses include Marlborough Buildings, Julian Road, Whiteway Road and Rush Hill (amongst others).

There was also concern about potential diversionary impacts elsewhere, most notably for Sydney Buildings.

- 3.10 The preferred scheme is predicted to achieve compliance with air quality objectives in all locations and the modelling indicates that changes in traffic flows around the boundary will be minimal. There is therefore no technical reason to make changes to the boundary to ensure compliance. However it is proposed that priority is given to monitoring traffic flows and air quality levels on roads where responses indicate community concerns about diversionary impacts and air quality. If necessary further traffic management interventions will be developed to mitigate, where possible, the impact of the scheme on these areas.
- 3.11 With respect to diversionary impacts as a result of the scheme in Queen Square, again it is proposed that priority is given to monitoring traffic flows and air quality levels on roads where responses indicate community concerns about diversionary impacts and air quality. However given that the modelling already predicts some significant increases in traffic flows, it is proposed that officers proceed with refining their proposals to actively manage the flow of traffic through Queen Square and develop further traffic management interventions in preparation for mitigating, if necessary, the impact of the scheme on these areas.
- 3.12 Appendix 3 sets out the latest version of the Council's communications strategy and plan up to and beyond the launch date of the scheme, which integrates with the national communications strategy being developed by JAQU. Along with the business engagement and community liaison activity planned, this will ensure that all affected businesses and members of the public are aware of the changes, together with the significant financial support packages requested to help manage their transition to compliance.

4 STATUTORY CONSIDERATIONS

- 4.1 The statutory requirement to consult on road user charging schemes is contained in section 170(1A) of the Transport Act 2000, which states that the charging authority:
- "must consult such local persons, and such representatives of local persons, as they consider appropriate about the charging scheme."*
- 4.2 The public consultation encouraged interested parties to comment on the final version of the charging order, in fulfilment of the above statutory duty and comments can be found in Appendix 4 which is the report of the full response to the consultation.
- 4.3 Whilst the order is now deemed to be in a final version, due to the uncertainty around the national position, it will not be sealed in advance of the operational date. This will allow minor changes to be made to the form and function of the technical aspects of the order without a requirement to promote another version and incur further costs. No significant changes would be made to the order that would affect

compliance of vehicles or boundaries of the zone without further public consultation.

- 4.4 Failing to take action towards achieving compliance within the shortest possible time could leave the Council exposed to legal challenge, not only for a failure to fulfil its statutory duty to comply with the latest Ministerial Direction, but also its obligations under air quality law to achieve compliance with legal NO₂ limits in the shortest possible time.
- 4.5 The Council has received a total of 3 separate Ministerial Directions throughout the development of the scheme; this last Direction was received on 17 October 2019 and referred to the submission of the FBC to central government by 13 December 2019 at the latest. Due to changes in the national political landscape and the calling of a general election in November 2019, the Council was bound to comply with the requirements of the pre-election period, which prevented the submission of the FBC on time due to the cancellation of the Cabinet meeting on 5 December 2019.
- 4.6 The Council has a public sector equality duty to have due regard to the need to (in summary) eliminate discrimination, advance equality of opportunity, and foster good relations between people who share a relevant protected characteristic and those who do not. An Equalities Impact Assessment (EqIA) was drafted in September 2018 so that the Council could fulfil this duty and has been subsequently reviewed following the latest public consultation. The EqIA in Appendix 5 should be read in conjunction with the Distribution and Equalities Impact Analysis.
- 4.7 The EqIA identifies that there are potentially positive health impacts for those protected characteristics groups including age, disability, pregnancy and maternity. Potentially negative impacts for reasons of affordability and accessibility could exist for the protected characteristic groups including age, disability and race. Negative impacts could also exist for residents living outside of the CAZ and businesses. Measures to mitigate these negative impacts have been incorporated into the proposed scheme including concessions and exemptions for blue badge holders, community transport providers and wheel chair accessible taxi vehicles (an amendment to the taxi licensing policy will be made to accommodate this concession).
- 4.8 JAQU is developing a national operational agreement for all Local Authorities for the operation of a Clean Air Zone. This agreement will be in place prior to the live date of the Clean Air Zone and will set out the roles of each party and the responsibilities to ensure that the Council is protected both financially and reputationally once the scheme commences. Each agreement will also cover any local elements of the scheme to ensure that these are recorded officially. The Council will be expected to sign up to the agreement before launching the Clean Air Zone, once all parties are satisfied with the contents.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 As part of the FBC, updated financial information is provided below as an update to the Cabinet report in September 2019.

5.2 Capital expenditure for the CAZ infrastructure and mitigation measures is to be funded via grant award by DEFRA and Department of Transport. Further funding opportunities through the West of England Combined Authority (WECA) to enhance the package of measures have been agreed in principle.

The current total scheme capital costs and funding awards are set out in the tables below:

| | Approved Budget £'000 | For Provisional Approval £'000 | Total £'000 |
|---|--------------------------|-----------------------------------|----------------|
| Capital Spend | | | |
| Implementation of CAZ | 5,950 | 1,325 | 7,275 |
| Risk allocation | | 2,797 | 2,797 |
| Mitigation measures to support those impacted by the scheme | | 14,198 | 14,198 |
| Total Capital Spend Estimate | 5,950 | 18,320 | 24,270 |

| | Funding Fully Secured £'000 | Funding subject to grant award £'000 | Total £'000 |
|---|--------------------------------|---|----------------|
| Capital Funding | | | |
| Implementation Fund Grant including risk allocation (DEFRA/DFT) | 5,950 | 4,122 | 10,072 |
| Clean Air Fund (DEFRA/DFT) | - | 14,198 | 14,198 |
| Total Capital Spend Estimate | 5,950 | 18,320 | 24,270 |

5.3 The funding for the capital spend is from the following sources:

Implementation Fund Grant (DFT/DEFRA) £5.95M of capital has already been awarded to the Council towards design development and implementation of the scheme. As part of the FBC a further £4.122M (including risk allocation) is being requested.

Clean Air Fund (DFT/DEFRA) £14.198M of capital funding subject to government approval of the FBC to fund the mitigation measures as set out in the FBC.

5.4 Capital Programme approval has been given for the £5.95M of secured grant funding, and capital approval is being sought to transfer the provisional balance incorporated into 2020/21 budget proposal to full approval, subject to grant award.

5.5 Revenue expenditure for the CAZ infrastructure and mitigation measures is to be funded via grant award by DEFRA and Department of Transport and revenue from operating the CAZ. The Councils 2020/21 revenue budget will be adjusted to incorporate the CAZ income and expenditure budgets on the basis the scheme is fully funded.

5.6 Over the initial two-year period (2019-2021) the forecast scheme revenue costs and requested funding awards are set out in the table below:

| Operating Income | £'000 |
|--|---------------|
| Operating Revenue | £2,113 |
| Mitigation (CAF) Revenue Grant | £1,858 |
| Scheme (IF) Revenue Grant | £1,727 |
| Total | £5,698 |
| Operating Expenses | £'000 |
| Mitigation (CAF) Operating Costs | £1,858 |
| Scheme (IF) Operating Costs | £2,670 |
| Total | £4,528 |
| Contribution to Sinking Fund to Cover Long-term Shortfall | £1,170 |
| Contribution to Revenue Reinvestment Reserve (residual monies) | £0 |

Over the full 10-year period modelled (2019-30) the forecast total scheme revenue costs and requested funding awards are set out in the table below:

| Operating Income | £'000 |
|--|----------------|
| Operating Revenue | £17,365 |
| Mitigation (CAF) Revenue Grant | £1,989 |
| Scheme (IF) Revenue Grant | £1,727 |
| Total | £21,081 |
| Operating Expenses | £'000 |
| Mitigation (CAF) Operating Costs | £2,461 |
| Scheme (IF) Operating Costs | £14,272 |
| Total | £16,733 |
| Contribution to Sinking Fund to Cover Long-term Shortfall | £2,804 |
| Contribution to Revenue Reinvestment Reserve (residual monies) | £4,348 |

5.7 Revenue costs such as staff and system costs for the entirety of the scheme are forecasted to be covered by income generation and government grant funding. The FBC will seek further assurance that impacts associated with any risk to the forecasted revenue generated from the scheme are fully underwritten by central government to protect the Council's wider revenue budget position. Within the financial model, the scheme forecasts higher levels of income before income levels begin

to decline as compliance is gained. A sinking fund is proposed to provide smoothing of income in future years and to ensure that monies are ring-fenced for known costs.

- 5.8 It is a requirement of the Transport Act 2000 that a general plan outlining the use of the net proceeds from the scheme for a period of 10 years and a detailed programme for the application of the net proceeds during the opening five year period, is incorporated into the Charging Order. The relevant section of the Order is contained in Appendix 6.
- 5.9 The Council is committed to providing access through finance partners to financial assistance to upgrade to compliant vehicles for those individuals, organisations and businesses that are impacted by the implementation of the scheme. This is currently proposed to be in the form of a grant and/or interest free finance. Government grant funding is being sought to cover the administration and finance costs associated with the financial assistance scheme within a high, medium and low grant funding option provided as requested (with the high level of funding proposal requesting a total of £11.222m capital on current forecasts) with the finance partners providing the capital for the scheme (£19.192m on current forecasts).
- 5.10 To provide the financial assistance scheme the Council will need to appoint one or more financial partners. This will follow both the confirmation of the necessary government funding and the completion of a tender process to select partners with the skills and experience to manage and administer the scheme on the Council's behalf. Due to the high level of capital funding to be provided by the finance partner(s), the specialist nature of the market, and the significant level of Council support being proposed, expert consultants have been appointed to assist with this tender, selection and appointment process.
- 5.11 To deliver the other mitigation measures as proposed in the CAF, a number of other tender processes are being undertaken in line with the Council's Contract Standing Orders to ensure best value is achieved.
- 5.12 It is also necessary to appoint to a number of posts on fixed term contracts in line with Council recruitment guidelines. These posts will be fully funded from grant settlements from central government and revenue from the scheme and work is ongoing to find the necessary office accommodation for the Project Team, consultants and contractors.
- 5.13 The proposed charges for entry to the Clean Air Zone in Bath are proposed to be £100 for non compliant HGVs, buses and coaches and £9 for non compliant taxis/PHVs and LGVs/vans. These charges are in line with the proposed charges released by Bristol City Council as part of their recent public consultation, providing regional alignment.

6 RISK MANAGEMENT

- 6.1 A risk assessment for the project has been undertaken, in compliance with the Council's decision making risk management guidance. Specific

information can be found in the project documentation (as published on the website).

- 6.2 The delivery and success of the CAZ has a range of interdependencies with national, sub-regional and local stakeholders and statutory bodies, whose activities, programmes and policies could have significant implications on the delivery of air quality compliance in the shortest possible time in Bath and North East Somerset. All relationships with these bodies are monitored by the Project Team and reported to the Project Board.
- 6.3 The implementation works for mobilising the scheme is capital expenditure, in line with grant funding. If the project was not completed there is a risk that these costs, or an element of these costs, would need to revert to revenue. This is currently assessed as low risk, but will continue to be monitored through the Project Board governance processes.
- 6.4 If at any point revenue enforcement income and associated government grant income did not cover costs, any shortfall would ultimately need to be underwritten by JAQU. A significant annual surplus is also projected which will be ring-fenced for future use in a revenue reinvestment reserve. Eventually, if income fell in the medium term, this would mean compliance has been gained and running costs would correspondingly be reduced to mitigate any adverse impact. It has been recognised that Government will honour the burden created following new burdens principle (subject to the test of the burden being reasonable).
- 6.5 In the event that government grant funding does not underwrite costs, then the scheme will be reviewed to ensure costs are managed within available funding as in recommendation 2.13.
- 6.6 The S151 Officer and the Monitoring Officer have been involved in the formation of both the draft FBC and Clean Air Fund bids, and have signed this report off for publication.

7 CLIMATE CHANGE

- 7.1 The Council declared a Climate Emergency in March 2019, committing it to providing the leadership necessary to enable Bath and North East Somerset to achieve carbon neutrality by 2030. Research undertaken since March 2019 has recommended three immediate priority areas for action which includes the need for a major shift to mass transport, walking and cycling to reduce transport emissions i.e. implementing policies to enable a 25% cut in car and van mileage per person per year by 2030, coupled with a 76% switch to fully electric cars and 14% to petrol/electric hybrid, leaving just 10% petrol/diesel cars on the road by 2030. Full electrification of passenger rail is also proposed by 2030.
- 7.2 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 the internal Transport Steering Group and there is

opportunity for reinvestment to directly or indirectly facilitate the achievement of Bath and North East Somerset Council's transport policies. These policies include schemes to reduce the use of private vehicles, which will further contribute to a reduction in carbon dioxide generated by transport and travel.

8 OTHER OPTIONS CONSIDERED

8.1 To delay the submission of the FBC further which would be contrary to the requirements of the latest Ministerial Direction. This approach was rejected as it would significantly impact the Council's ability to achieve compliance in the shortest possible time and by 2021 at the latest.

9 CONSULTATION

9.1 Failing to properly consult or to consider the outcomes from the public consultation when making a significant decision which could affect the transport and travel choices of a large number of businesses and individuals would leave the Council at risk of legal challenge. The principles adopted to ensure fair consultation are detailed below:

- a) consultation must take place when the proposal is still at a formative stage;
- b) sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response;
- c) adequate time must be given for consideration and response; and
- d) the product of consultation must be conscientiously taken into account.

9.2 The public consultation on the proposed changes since the previous public consultation and the draft Charging Order setting out how the final proposed scheme will operate was carried out between 23 September and 20 October 2019 (a 4 week period). The consultation sought feedback and 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.

9.3 A number of public events were held where members of the public could come and speak individually with the Project Team. These events were supported by a wider communications plan involving a postcard which

was delivered to every residential and business address in B&NES through a Royal Mail door to door marketing campaign, media releases (including the use of social media) and website updates. Additional face to face meetings were held during the consultation period with key stakeholders.

9.4 The previous public consultation in November 2018 (which proposed a Class D CAZ including private cars) elicited 8,421 responses from members of the public. In the most recent consultation on a Class C CAZ, 661 responses were received; 570 online, 27 from paper questionnaires and 65 from emails/letters sent directly to the Project Team. The key themes from the responses were:

- There is general support for tackling air quality in B&NES and there is recognition that more should be done. Respondents seemed generally accepting of the scheme, whilst recognising that there were challenges to overcome.
- There were mixed views on the change in the preferred option from a Class D to a Class C CAZ; 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 and that a Class D CAZ would better address the climate emergency.
- The changes to the scheme boundary since the last public consultation were appreciated, however despite the proposed Class C CAZ (removing private cars from the scheme) concerns remained about potential diversionary impacts and impacts on traders.

A full detailed report on the public consultation and its analysis is attached at Appendix 4.

9.5 As a result of the public consultation, the following changes to the FBC are proposed:

- A change in the definition of 'registered health care provider' to include private sector educational providers and practitioners
- Clarification that the concession for Euro 4/5 diesel vehicles used by blue badge holders are for people using LGVs/vans and taxis/PHVs and not buses, coaches and HGVs.
- Clarification that the concession for Euro 4/5 diesel wheelchair accessible taxis/PHVs are for vehicles not otherwise exempt under the disabled vehicles tax class.

These changes have all been incorporated into the scheme.

| | |
|---|--|
| Contact person | <i>Chris Major x4231</i> |
| Background papers | <p><i>E3152 Bath's Clean Air Plan- September 2019 update</i></p> <p><i>Insert link</i></p> <p><i>E3132 Bath's Clean Air Plan</i></p> <p><i>Documents published on the Council's website, including the Outline Business Case and Equalities Impact Assessment</i></p> <p>https://www.bathnes.gov.uk/bath-breathes-2021-overview</p> |
| <p>Please contact the report author if you need to access this report in an alternative format</p> | |

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Bath Clean Air Plan

Bath and North East Somerset Council

Full Business Case

674726.BR.042.FBC | 2

December 2019

DRAFT

Bath Clean Air Plan

Project No: 674726.BR.042
 Document Title: Full Business Case
 Document No.: 674726.BR.042.FBC
 Revision: 2
 Date: December 2019
 Client Name: Bath and North East Somerset Council

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Document history and status

| Revision | Date | Description | By | Review | Approved |
|----------|------------|-------------------------------|------------|--------|----------|
| 1 | 14.06.2019 | Initial FBC draft for comment | GW, ML, LC | DC, RR | RR |
| 2 | 15/12/2019 | Updated FBC draft | GW, ML, LC | DC | RR |
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Appendix A. Scheme Documents and Related Documentation to Systems Set Up

Appendix B. Stakeholder Management and Engagement Plan

Appendix C. Options Assessment Report

Appendix D. Air Quality Reports

Appendix E. Transport Modelling Reports

Appendix F. E1: Economics Appraisal Methodology Report

Appendix G. Distributional and Equalities Impact Analysis

Appendix H. Clean Air Plan Procurement Strategy

Appendix I. Explanatory Note on CAZ System Cost Estimates

Appendix J. Draft Charging Order

Appendix K. Bath CAP Infrastructure Work Programme

Appendix L. Stated Preference Survey Report

Appendix M. Quantified Risk Assessment

Appendix N. Sensitivity Testing Technical Note

Appendix O. Engagement Summary Report

Appendix P. Environmental Assessment

Appendix Q. Consultation Report

Appendix R. Evaluation, Monitoring and Benefits Realisation Plan

Appendix U. Letter from S151 Officer

Appendix V. Memorandum of Understanding for Emergency Service Vehicles

Appendix W. Financial Report

Appendix Y. Clean Air Fund Report

Acronyms and Abbreviations

| | |
|-----------------|--|
| ANPR | Automatic Number Plate Recognition |
| AQMA | Air Quality Management Area |
| AQ Mesh | Air Quality (Mesh) wireless communications monitoring device |
| AQO | Air Quality Objective |
| ATC | Automatic Traffic Counter |
| B&NES | Bath and North East Somerset Council |
| BEIS | Department for Business, Energy and Industrial Strategy |
| BoQ | Bill of Quantities |
| BT | British Telecom |
| CAF | Clean Air Fund |
| CAP | Clean Air Plan |
| CAPEX | Capital Expenditure |
| CAZ | Clean Air Zone |
| CCS | Crown Commercial Services |
| CO ₂ | Carbon Dioxide |
| COBALT | Cost and Benefit to Accidents – Light Touch |
| CSF | Critical Success Factor |
| Defra | Department for the Environment, Food and Rural Affairs |
| D-IRP | Delivery Independent Review Panel |
| DfT | Department for Transport |
| DVLA | Driver and Vehicle Licensing Authority |
| EFT | Emissions Factor Toolkit |
| EMF | Early Measures Fund |
| EU | European Union |
| EV | Electric Vehicle |
| FBC | Full Business Case |
| GAB | Getting Around Bath |
| GHG | Greenhouse Gas |
| GUL | Go Ultra Low Cities Funding |
| GVA | Gross Value Added |
| HD | High Definition |
| HE | Highways England |
| HM | Her Majesty's |
| HGV | Heavy Goods Vehicle |
| IF | Implementation Fund |
| ITS | Intelligent Transport Systems |
| JAQU | Joint Air Quality Unit |
| JSP | Joint Spatial Plan |
| JTS | Joint Transport Strategy |
| LAQM | Local Air Quality Management |
| LEP | Local Enterprise Partnership |

| | |
|-------------------|--|
| LEV | Low Emissions Vehicle |
| LGV | Light Goods Vehicle |
| MEV | Mobile Enforcement Vehicle |
| NAEI | National Atmospheric Emission Inventory |
| NEC3 | New Engineering Contract (version 3) |
| NO | Nitrogen Oxide |
| NO ₂ | Nitrogen Dioxide |
| NO _x | Nitrogen Oxides |
| NPV | Net Present Value |
| OBC | Outline Business Case |
| OJEU | Official Journal of the European Union |
| OPEX | Operational Expenditure |
| P&R | Park and Ride |
| PCM | Pollution Climate Mapping |
| PCN | Penalty Charge Notice |
| PHEV | Plug-in Hybrid Electric Vehicle |
| PM | Particulate Matter |
| PM _{2.5} | Particulate Matter with particles less than 2.5 micrometers diameter |
| PM ₁₀ | Particulate Matter with particles less than 10 micrometers diameter |
| PMP | Placemaking Plan |
| PV | Present Value |
| RPZ | Residents Parking Zone |
| RTI | Real Time Information |
| QRA | Quantified Risk Assessment |
| SCOOT | Split, Cycle and Offset Optimisation Technique |
| SME | Small and Medium-sized Enterprise |
| SOC | Strategic Outline Case |
| SRN | Strategic Road Network |
| SRO | Senior Responsible Officer |
| TEE | Transport Economic Efficiency |
| T-IRP | Technical Independent Review Panel |
| TM | Traffic Management |
| TRO | Traffic Regulation Order |
| TPT | Traffic Penalty Tribunal |
| TUBA | Transport User Benefits Assessment |
| TUPE | Transfer of Undertakings (Protection of Employment) Regulations |
| UK | United Kingdom |
| ULEV | Ultra-Low Emission Vehicle |
| UNESCO | United Nations Educations, Scientific and Cultural Organization |
| UTMC | Urban Traffic Monitoring and Control |
| VEAT | Voluntary Ex Ante Transparency |
| VMS | Variable Message Sign |

WECA West of England Combined Authority
WebTAG Web Transport Analysis Guidance
WoEITS West of England Intelligent Transport Systems

DRAFT

Executive Summary

Background

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 is breached across the UK, including at several locations in Bath.

In 2017 Bath and North East Somerset Council (B&NES) was 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, as part of the Plan, B&NES is proposing implementation of a Clean Air Zone, in order to achieve sufficient improvement in air quality and public health. This report sets out the Full Business Case (FBC) for the CAP, building on the preferred option identified in the final Outline Business Case (OBC)¹. It has been produced in line with the Inception, Evidence and Options Appraisal packages of Guidance issued by the JAQU in 2017, and Her Majesty's (HM) Treasury Green Book². It details the rationale and justification for securing funding from central government to deliver the plan outlined in the FBC.

The FBC details the preferred option (package of measures) which achieves two primary objectives:

- 1) To deliver a scheme that leads to compliance with NO₂ concentration Limit Values³ in the shortest time possible.
- 2) To deliver a scheme which leads to compliance with the Local Air Quality Management (LAQM) Air Quality Objectives (AQOs)⁴ for NO₂ concentrations.

Key Health Benefits

Achieving compliance with air quality standards across Bath will result in widespread public health improvements. Specific health impacts for NO₂ include:

- Long-term exposure to air pollution is linked to increases in premature death, associated with lung, heart and circulatory conditions.
- Short term exposure can contribute to adverse health effects including exacerbation of asthma, effects on lung function and increases in hospital admissions.
- Other adverse health effects including diabetes, cognitive decline and dementia, and effects on the unborn child⁵ are also linked to air pollution exposure.

Transport is widely acknowledged as a key driver of air quality issues. It is estimated in B&NES that around 92% of all Nitrogen Oxide (NO_x) emissions are attributable to road traffic. Consequently, the Bath Clean Air Plan has been developed with an understanding of the wider transport, business and air quality strategies in B&NES and beyond, in order to accord with these policies wherever possible. Whilst the objectives of the CAP overlap with other local and regional strategies, and its delivery could be beneficial to achieving the objectives within these strategies, the CAP has its own specific objectives (resulting from the legal direction on B&NES) and therefore cannot achieve all other local transport objectives.

Existing and Forecast Air Quality Exceedances

¹ Jacobs (05.03.2019) *Bath and North East Somerset Clean Air Plan – Outline Business Case*

² HM Treasury (2018) *The Green Book: Central Government Guidance on Appraisal and Evaluation*.
<https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

³ European Union (2008) *Directive 2008/50/EC: on ambient air quality and cleaner air for Europe Annex III*, Official Journal of the European Union. <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:32008L0050>

⁴ Set out in the Air Quality (England) Regulations (SI 2000/ 928 as amended)

⁵ Royal College of Physicians (2016) *Every breath we take: the lifelong impact of air pollution*.
www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

Annual mean concentrations of NO₂ continued to show exceedances of both the Limit Values and Air Quality Objectives in 2017 across Bath, and this is predicted to continue by 2021 if no action was taken. Reductions between 2017 and 2021 are expected to occur naturally through the gradual improvement of the fleet as vehicles are replaced but are not expected to happen quickly enough to achieve compliance across the city.

Stakeholder Engagement

Engagement with the public and stakeholders is an important part of developing the CAP for Bath. The Council has made a commitment to communicate and engage with both the public and stakeholders throughout the various business case stages, development of the Plan and implementation of the measures required to reduce emissions. The feedback received has been used to inform the technical work and shape the design of the CAP detailed within this FBC.

The engagement process began in February 2018 and is ongoing. A detailed summary of the comments received to date is provided within this FBC.

Option Assessment

Initially the analysis undertaken in the draft OBC found that compliance in the shortest possible time, in 2021, was only achieved at all locations with a Class D CAZ with a £9 charge for cars/taxis/PHVs/LGVs and £100 charge for buses/coaches/HGVs. This option was consulted upon in Autumn 2018.

Further technical refinement of the baseline air quality modelling was undertaken following the Autumn 2018 consultation, which subsequently enabled a Class C CAZ with a £9 charge for taxis/PHVs/LGVs and £100 charge for buses/coaches/HGVs with a local traffic management scheme to be developed. When assessed this was also found to achieve compliance in the shortest possible time. As such there were two equally effective schemes in terms of compliance alone.

On the basis of the economic assessment and the Critical Success Factors (CSFs) identified for the scheme, the final OBC determined the Class C CAZ with traffic management to be the preferred option. The B&NES Cabinet Members were presented with both options of a Class D CAZ and a Class C CAZ with traffic management in March 2019 and voted to support the Class C CAZ option. This option has been further developed within the FBC.

As well as the core charging zone, the following supporting measures are also required to achieve compliance:

- Bus replacement or retrofitting; and
- A traffic management scheme at Queen Square, where a Class C CAZ without traffic management showed a continued exceedance at A4 Gay Street, between George Street and Queen Square. This involves additional signal control in the north west and south west corners of Queen Square to reduce traffic flow through Gay Street.

Updates to the Preferred Option

Figure 1-1 shows the proposed CAZ boundary in Bath. Further changes were made following completion of the OBC, primarily for public and political acceptability of the scheme based on feedback from the initial consultation.

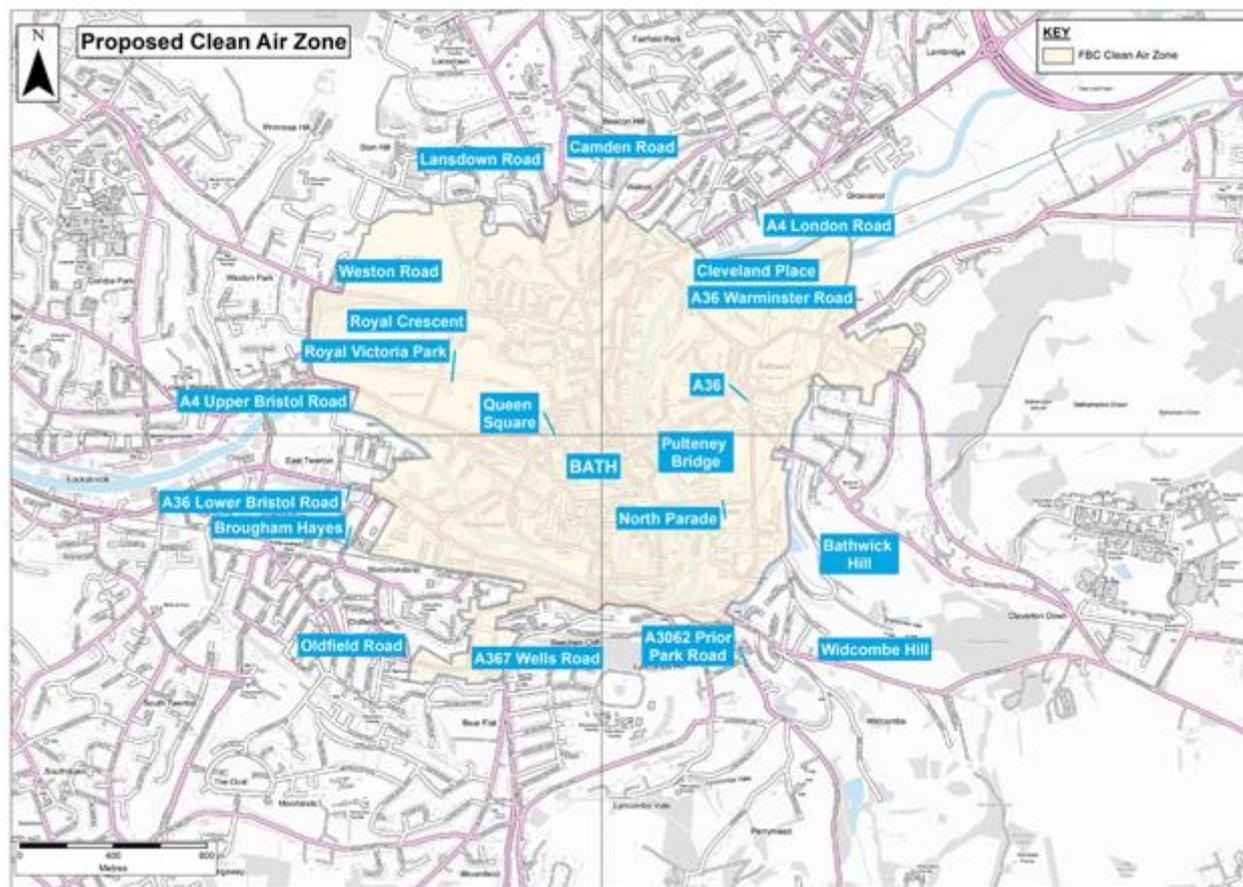


Figure 1-1: Proposed Bath Clean Air Zone Boundary

Enforcement, Concessions and Exemptions

The CAZ area will be enforced with Automatic Number Plate Recognition (ANPR) cameras, both internally and at the boundary crossing points; the cameras will capture the number plate details every time a vehicle passes. Drivers of non-compliant vehicles will be required to pay the CAZ charge using an online system. Charges will apply once in every 24-hour period (midnight – midnight), 7 days a week, 365 days a year. They will apply to higher emission taxis, PHVs, LGVs, buses, coaches and HGVs. A letter and eventually a fine will be issued to those who fail to pay.

Local exemptions and concessions (i.e. time-limited exemptions or sunset periods) are proposed for the CAZ, but only where they are not expected to affect compliance from being achieved in 2021. The proposed concessions/exemptions have been established through technical analysis and feedback from the ongoing engagement work.

Mitigation Measures

A number of non-charging measures were identified in the OBC to support the delivery of the CAP. For the preferred option, these included measures that assist in the improvement of air quality, and those that mitigate impacts on key local groups including local businesses.

For the FBC, this package of measures was revisited to ensure it is fully targeted as mitigation for those impacted by the preferred scheme option, based on the Distributional and Equalities Impact Assessment.

Funding is sought from the Clean Air Fund (CAF) to deliver the following mitigation measures alongside the proposed CAZ scheme:

- Expanding the existing Clean Bus Technology Fund (CBTF) programme by providing additional funding for retrofitting registered, local Euro 3/4/5 buses. This measure is also needed for compliance.
- Financial support for replacing pre-Euro 6 diesel and pre-Euro 4 petrol non-compliant vehicles with compliant ones. This combines:
 - Financial support (grants) for replacing pre-Euro 6 diesel and pre-Euro 4 petrol vehicles and taxis/PHVs with compliant ones;
 - Financial support (interest free loans) for replacing pre-Euro 6 diesel and pre-Euro 4 petrol vehicles and taxis/PHVs with compliant ones;
 - Complementary financial support for installing electric charging points on private land in order to encourage the uptake of electric vehicles; and
 - Complementary financial support for retrofitting in order to allow cheaper, non-compliant vehicles to be made compliant.
- Provide support and facilities for alternative delivery and servicing options for businesses. This combines:
 - Delivery and servicing plans for businesses;
 - Increased utilisation of the car/van club in Bath, with an emphasis on increasing the number of LGVs/vans available to businesses; and
 - Expanding the proposal (included in Go Ultra Low package) to introduce 'last mile' electric cargo bike hire to the city.
- Provide a sustainable travel and transport team to facilitate the use of the mitigation schemes by the impacted groups and ensure uptake.

Economic Impact

For the FBC, the economic assessment for the preferred option was revisited to reflect the boundary changes since OBC, in accordance with the CSFs.

The economic assessment has been undertaken in accordance with JAQU guidance and the HM Treasury Green Book to monetise the CAP's impact based on the value to society. The assessment resulted in a significant negative net present value (NPV), which is as concluded by the OBC, indicating that the economic costs for the proposed scheme outweigh the benefits. The main contributors to economic costs are the loss in consumer welfare associated with the change in travel patterns and behaviours, set up and operational costs of the scheme and vehicle upgrade costs for users.

Projected Costs and Funding

The total request to central government for the delivery and operation of B&NES' Clean Air Plan is around £22.0 million (nominal prices, exclusive of the £5.95 million has already been secured), split as follows:

- £18.3million in capital grant funding, of which:
 - £4.1 million from the Implementation Fund (exclusive of the £5.95 million of funding already secured);
 - £14.2 million from the Clean Air Fund.
- £3.7 million in revenue grant funding, of which:
 - £1.7 million from the Implementation Fund, required to cover:

- The initial operational costs (pre-implementation) for those scheme components required to achieve compliance; and
 - The potential operational deficit that could materialise in the first six months of 2021, in the event that worst case scenario assumptions apply.
- £2.0 million from the Clean Air Fund required to cover selected operational costs of scheme components required to mitigate against potential adverse impacts of the Clean Air Plan on local residents and businesses.

Procurement Strategy

A large range of works and services are being procured for delivery of the CAP. Where possible, these are being procured through existing arrangements. The main advantages of using these current relationships are to achieve the timescales required, while being able to fully align with existing operations and maintain high quality standards of work. If it is not possible to procure through existing arrangements, a tendering process has been followed in accordance with Contract Standing Orders.

However, in many cases, B&NES has previously tested the market and value for money has already been established. Supplier engagement is in progress with the detailed design, scope of works and costs now predominantly confirmed.

Management of the Scheme

B&NES has a proven track record of delivering recent transport and environmental projects of a similar type and scale to the proposed CAP. This practical experience of delivering schemes of a similar size and nature means B&NES has a thorough understanding of the challenges, and associated solutions, that could materialise during implementation and operation of the CAP. Examples include the Bath Transportation Package and Bus Lane and Parking Enforcement projects.

The project will continue to be managed in accordance with the PRINCE2 principles set out in the B&NES Corporate Project Management System. Key roles have been defined, and a structure for the management of the project in line with best practice is proposed. This structure will ensure the project is well managed, including management of risks and change control.

A comprehensive monitoring and evaluation plan will support the process of benefits realisation of the CAP. Local data from the monitoring and evaluation process will also be used to support the central evaluation work being undertaken by Defra.

1. Full Business Case Introduction

1.1 Overview of Study

The United Kingdom (UK) has in place legislation passed down from the European Union (EU), to ensure that certain standards of air quality are met by setting Limit Values on the concentrations of specific air pollutants. In common with many EU member states, the EU Limit Value for annual mean Nitrogen Dioxide (NO₂) is breached in the UK and there are on-going breaches of the NO₂ Limit Value in Bath. The UK Government is taking steps to remedy this breach in as short a time as possible, with the aim of reducing the harmful impacts on public health. Within this objective, the Government published a UK Air Quality Plan⁶ and a Clean Air Zone Framework⁷ in 2017, the latter document provides the expected approach for local authorities when implementing and operating a Clean Air Zone (CAZ).

Due to forecast air quality exceedances, Bath and North East Somerset Council (B&NES) has been directed by Minister Therese Coffey of The Department for the Environment, Food and Rural Affairs (Defra) and Minister Jesse Norman of The Department for Transport (DfT) to produce a Clean Air Plan (CAP) to achieve air quality improvements in the shortest possible time. In line with Government guidance, as part of the Plan, B&NES is considering implementation of a 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 a Full Business Case (FBC) for the delivery of 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 focus of this CAP is on achieving air quality and public health improvements in the shortest time possible in accordance with the High Court Order in November 2016⁸. In the legal case of Client Earth vs the UK Government, Mr Justice Garnham of the High Court found that *'I reject any suggestion that the state can have any regard to cost in fixing the target date for compliance or in determining the route by which the compliance can be achieved where one route produces results quicker than another. In those respects, the determining consideration has to be the efficacy of the measure in question and not their cost. That, it seems to me, flows inevitably from the requirements in the Article to keep the exceedance period as short as possible'*. Hence the assessment presented within this document focuses on achieving compliance in the shortest possible time and will only consider cost when comparing between two packages of measures which are equivalent in terms of their timescales for compliance.

Achieving compliance with air quality standards across Bath will result in public health improvements at all locations where exceedances are currently recorded, as well as reducing harm across the entire city.

To support delivery of the plan, the Joint Air Quality Unit (JAQU) have made three core funding streams available:

- Implementation Fund (IF) – provided on a needs basis to deliver measures required to achieve compliance with air quality standards in the shortest possible time.
- Clean Air Fund (CAF) – provided via a competitive bid process, to deliver measures designed to mitigate any adverse distributional impacts expected to fall upon disadvantaged groups (low-income households and businesses in particular).
- Early Measures Fund (EMF) – provided via a competitive bid process, to support small, ambitious, good value for money and highly deliverable measures that catalyse air quality improvements at an advanced stage.

⁶ Defra & DfT (July 2017) *UK plan for tackling roadside nitrogen dioxide concentrations: details plan*.
<https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>.

⁷ Defra & DfT (May 2017) *Clean Air Zone Framework: Principles for setting up Clean Air Zones in England*.
<https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england>

⁸ November 2016 in R (ClientEarth) (NO₂) V Secretary of State for Environment Food and Rural Affairs [2016] EWHC 2740 (Admin)

B&NES has already successfully received funding from the EMF application, relating to a parking permit scheme for low emission vehicles. Following acceptance of the OBC, B&NES has also received funding from the Implementation Fund to implement the key infrastructure for the proposed charging zone.

Note that there are also other funding streams that may be available to support the principles and objectives of the Plan. Whilst not directly established by JAQU to support Local Plan's, funding opportunities such as the Taxi Infrastructure Fund, Go Ultra Low Cities Funding (GUL), Plug-In Taxi Grants and Clean Vehicle Technology Fund could all play a role in supporting the delivery of elements of the Plan. These other relevant funds are discussed in more detail in the Financial Case, Section 5.2. That said, the primary focus of this FBC is the case for securing the remaining IF and CAF monies to deliver the Plan.

1.2 Purpose of this Report

This report sets out the FBC for the CAP, building on the preferred option identified in the final OBC (March 2019), which will bring about compliance with the Limit Value for annual mean NO₂ in the shortest time possible in Bath. It has been produced in line with the Inception, Evidence and Options Appraisal packages of Guidance issued by the JAQU in 2017, and Her Majesty's (HM) Treasury Green Book. It details the rationale and justification for securing Implementation Funding and Clean Air Funding from JAQU to deliver the plan outlined in the OBC, and how this will be implemented and operated.

1.3 Structure of this Report

This report details the FBC and the preferred option for the Bath Clean Air Plan, which was identified within the OBC following traffic and air quality modelling, economic and social distributional impact assessments. This report builds on the OBC to provide details on any changes to the core scheme, updated procurement and financial information, and a detailed management plan for the implementation and operation of the CAP. Revised proposals for mitigation measures, to support those affected by the preferred option, are also presented.

Within this context, the remainder of this report is structured around the five cases, namely:

- **Strategic Case**, Section 2 – sets out the case for change and the spending objectives of the Plan. For this FBC this includes updates from the OBC options assessment and stakeholder engagement.
- **Economic Case**, Section 3 – assesses the preferred option that achieves compliance in the shortest possible time from a value for money perspective, as well as identifying distributional impacts of the preferred option. The section has been updated from the OBC for the latest scheme costs and mitigation measures.
- **Commercial Case**, Section 4 – provides details on the selected procurement routes and progress, with the recommended delivery approach.
- **Financial Case**, Section 5 – provides updated costings for the Plan, updated where possible following procurement, and available funding sources.
- **Management Case**, Section 6 – provides the governance and management arrangements to deliver the preferred option.

2. Strategic Case

2.1 Introduction

In the case of air quality in Bath, the current problem that needs to be addressed is the identified exceedance of the legal annual mean Limit Value for NO₂. The UK government's monitoring station on London Road in Bath reported an exceedance in 2017 and forecasts based on the Pollution Climate Mapping (PCM) model predicted that this exceedance would remain until 2021. More detailed, local monitoring data shows greater and more widespread exceedances than are indicated within the PCM model (for European regulations) in Bath, and also widespread exceedances of the Local Air Quality Management (LAQM) Air Quality Objectives (AQOs) which has resulted in the declaration of an Air Quality Management Area (AQMA). Further, the two public consultations have demonstrated that the existence of an air quality problem in Bath is recognised by the majority of local people. In the absence of suitably targeted interventions, the exceedances are expected to persist, meaning an improvement in public health will not be accelerated in Bath. Therefore, B&NES would fail to comply with its regulatory responsibilities as publicly-acknowledged air quality problems would continue.

Building on the findings of the SOC, the purpose of the CAP Strategic Case in the OBC was to establish the latest case for change and preferred way forward by:

- Identifying B&NES' statutory and regulatory air quality obligations;
- Presenting existing air quality conditions based on updated air quality and traffic modelling; and
- Outlining the desired goals of this CAP.

Within this context, and in accordance with JAQU's latest guidance, this Strategic Case now considers the following:

- The strategic context, underpinned by European, national and local policies that are pertinent to the project.
- Presentation of the results of the latest baseline air quality and transport modelling.
- Based on these findings, reconsideration of the Strategic Case put forward as part of the SOC; with the case for change and preferred way forward.
- The process and outcome of the options assessment undertaken for the OBC.
- Understanding of the project's benefits, risks, constraints and dependencies.
- Evidence from detailed stakeholder engagement, and the key messages.
- Presentation of a detailed logic map (or theory of change).

2.2 Air Quality: Background and Context

Poor air quality is the largest known environmental risk to public health in the UK⁹ and investing in cleaner air along with doing more to tackle air pollution are priorities for the EU and UK governments as well as B&NES. To this end, legislative bodies at all levels are motivated to implement air quality standards to be achieved through actions and policies, with the health of local people at the heart of the measures implemented. As a result, this section presents some of the key policy drivers influencing EU and UK Government policy for achieving air quality compliance. This CAP is concerned with both the EU and UK definitions of compliance.

⁹ 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>

2.2.1 Public Health Impacts

A range of public health issues are linked to poor air quality, as detailed below. These issues are believed to disproportionately affect 'at-risk' groups such as older people, children and people with pre-existing respiratory and cardiovascular conditions¹⁰:

- Long-term exposure to air pollution is linked to increases in premature death, associated with lung, heart and circulatory conditions.
- Short term exposure can contribute to adverse health effects including exacerbation of asthma, effects on lung function and increases in hospital admissions.
- Other adverse health effects including diabetes, cognitive decline and dementia, and effects on the unborn child¹¹ are also linked to air pollution exposure.
- Exposure can exacerbate lung and heart disease in older people¹².
- Between 28,000 and 36,000 deaths can be attributed to NO₂ and fine particulate matter (PM) pollution in England every year.

The primary driver for NO₂ regulations is public health concerns associated with NO₂. Specific health impacts for NO₂ include¹³:

- High concentrations of NO₂, that can lead to inflammation of the airways in lungs.
- Long-term exposure can increase symptoms of bronchitis in asthmatic children and reduced lung development and function.

2.2.2 European Requirements

The European air quality reporting regime is underpinned by European Air Quality Limit Values¹⁴. The UK Government has an obligation to achieve European Air Quality Limit Values. The relevant Limit Value relates to NO₂ which must not exceed 40 µg/m³ as an annual mean (i.e. measured over a calendar year).

In light of the public health issues outlined in Section 2.2.1, the UK government is legally responsible for ensuring that it complies with the provisions of the EU Air Quality Directives. The Government assesses air quality compliance with the European Directive in 43 areas across the country at single locations, using both monitoring and modelling. It uses Defra's PCM model to forecast exceedances, which is adjusted based on the monitored data. This is the approved means of reporting air quality information to assess legal compliance with the European legislation.

In 2015, 37 of the 43 monitored areas across the country were in exceedance of the annual mean Limit Value for NO₂. One such area includes a monitoring station on London Road Bath, where the Government has forecast that exceedances will remain until 2021. Local assessments based on a more comprehensive local dataset and more detailed modelling tools, suggest that compliance would not naturally occur until 2025. Between 28,000 and 36,000¹⁵ deaths can be attributed to NO₂ and fine PM pollution in England every year (previously estimated to be 40,000) and hence there is an urgent need to reduce pollution in Bath, and specifically to comply with the Limit Values and Air Quality Objectives (AQOs). The UK Government has discretionary powers to pass on this responsibility (and associated

¹⁰ World Health Organization (2013) *Review of evidence on health aspects of air pollution – REVIHAAP Project: final technical report*. <http://www.euro.who.int/en/health-topics/environment-and-health/air-quality/publications/2013/review-of-evidence-on-health-aspects-of-air-pollution-revihaap-project-final-technical-report>

¹¹ Royal College of Physicians (2016) *Every breath we take: the lifelong impact of air pollution*. www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

¹² Simoni et al., January 2015, *Adverse effects of outdoor pollution in the elderly*, Journal of Thoracic Disease, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4311079/>

¹³ World Health Organisation (2016) *Ambient (Outdoor) Air Quality and Health Fact Sheet* [http://www.who.int/en/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](http://www.who.int/en/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

¹⁴ European Union (2008) *Directive 2008/50/EC: on ambient air quality and cleaner air for Europe Annex III*, Official Journal of the European Union. <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:32008L0050>

¹⁵ Committee on the Medical Effects of Air Pollutants (2018), *Associations of long-term average concentrations of nitrogen dioxide with mortality*

legal outcomes) to local authorities. As a result of this, B&NES has been directed to develop a CAP to achieve compliance with the legal limit in the shortest possible time. Hence, there are public health and regulatory imperatives for improving air quality in Bath.

2.2.3 UK Government Requirements

To meet UK Government regulations, local authorities must demonstrate that they are working towards the National AQOs. The objective level for concentrations of NO₂ within the national legislation are the same as the European regulations (annual mean of 40 µg/m³) but are applied and assessed differently. AQOs only apply where people are exposed for the averaging period of the objective (i.e. for a year) and therefore, compliance with AQOs is assessed most commonly at building facades (where people are regularly present) including around busy major junctions.

The Government's LAQM regime requires all local authorities to regularly review and assess whether AQOs have been achieved at relevant locations. Where the assessment shows exceedances at relevant locations, the authority must declare an AQMA and prepare an action plan which identifies appropriate measures in pursuit of the objectives.

The difference between the EU and LAQM reporting regimes are further explained by Table 2-1 below:

Table 2-1: Comparison Between Limit Value and Objective Compliance

| | Limit Value | Objective |
|-------------------------------|---|---|
| Obligation | Legal obligation on UK Government. | Obligation on Local Authority to act in pursuit of the objective. |
| Relevant Exposure | Limit Values apply everywhere there is public access. | Annual mean objectives only apply at locations where public exposure is relevant to the averaging period, e.g. at residential building facades. |
| Treatment of Junctions | Monitoring is not carried out within 25 metres of a major junction and the same constraint is applied to the modelling | Junctions are specifically considered in both monitoring and modelling |
| Microscale | Excludes micro-environments and focuses on locations representative of 100m lengths of roads | Focuses on "hot-spot" locations |
| Roadside Modelling | Modelled using the PCM model. Concentrations apply to a distance of 4m from kerbside of the national road network. Local roads are excluded from the model. | Range of models can be used. Focus is on concentrations at the building façade, whatever distance from the kerb and alongside any road. |
| Monitoring | Restricted to monitoring stations in the national network, operated to meet the Data Quality Objectives of the Directive | Based on both automatic and passive diffusion samplers |

2.2.4 Local Assessment

As defined in detail in Section 2.4.2.1, substantial air quality assessment and monitoring activities already take place in Bath, with an AQMA having been declared in the city in 2002. The local monitoring data collected through the air quality assessment activities shows greater and more widespread exceedances than are indicated within the PCM model (for European regulations) in Bath. Figure 2-1 shows the PCM modelled concentrations in Bath (required to meet European regulations), and the local monitoring data recorded by B&NES (required to meet UK Government regulations) as recorded in 2017.

In light of this evidence and following the publication of the UK Government's latest air quality plan (July 2017), B&NES was directed to produce a Local CAP to address the air quality exceedances within Bath.

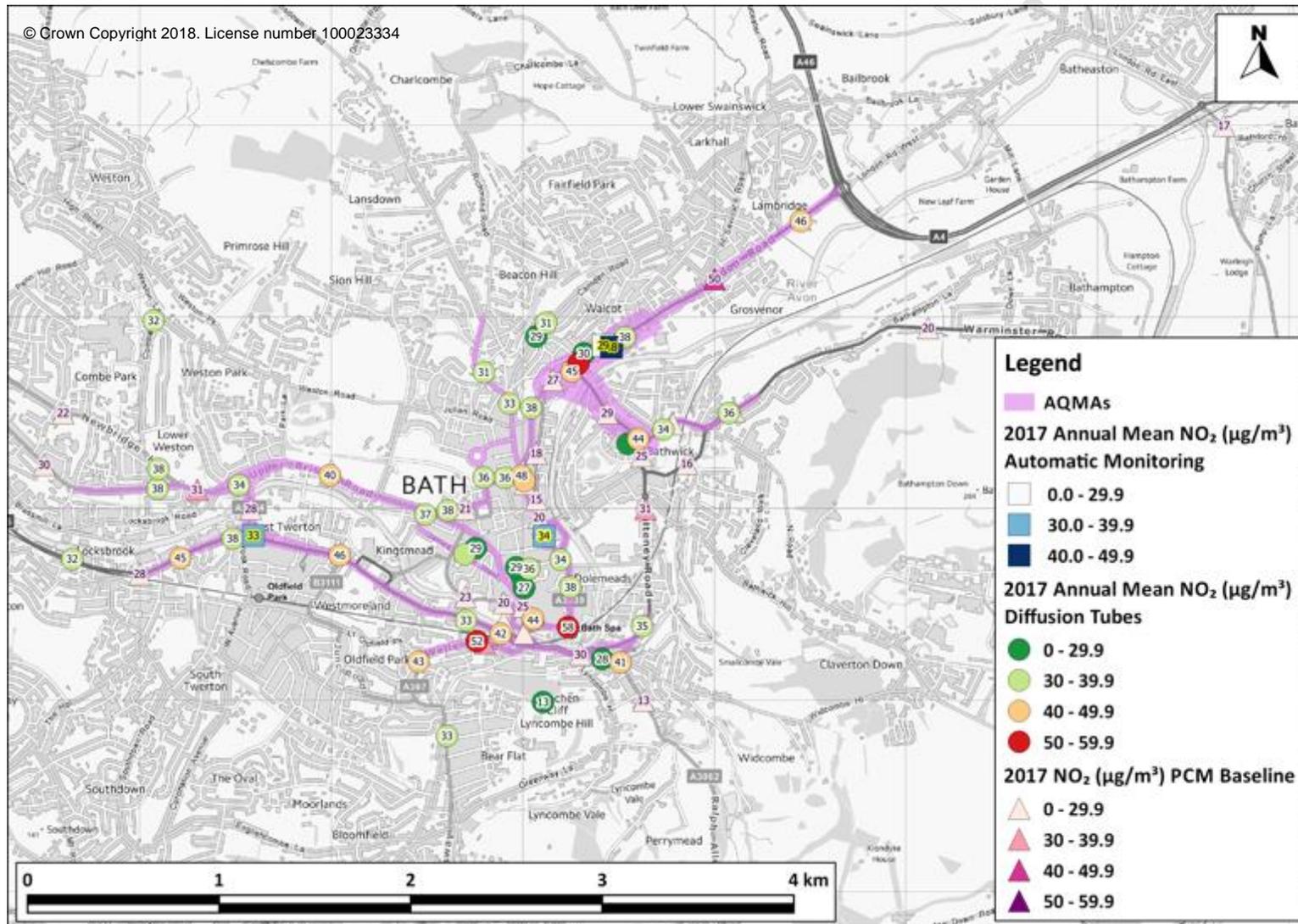


Figure 2-1: Comparison of annual nitrogen dioxide concentrations measured at monitoring sites in Bath

2.3 Transport, Business and Air Quality: Policy Context

2.3.1 Links Between Transport, Business and Air Quality

Transport is widely acknowledged as a key driver of air quality issues, with highway traffic problems such as congestion and fleet composition considered as a primary source of air pollution. For example, The UK National Atmospheric Emissions Inventory (NAEI) estimates that around one-third of all UK Nitrogen Oxides (NO_x) emissions were attributable to road traffic (especially diesel vehicles) in 2015¹⁶. NO_x is a generic term which includes both Nitrogen Oxide (NO) and NO₂. The causal link between road transport and air quality is even more marked in B&NES, given that vehicle movements are thought to be responsible for up to 92% of total NO_x concentration¹⁷.

Growth in vehicular traffic is tied to economic development and growth. As part of the West of England's emerging Joint Spatial Plan (JSP), B&NES is forecast to accommodate an additional 14,500 homes and a significant share of the 82,500 jobs projected for the West of England over the period 2016 to 2036. This scale of economic development will not only increase traffic on the highway network, it will also increase the number of people likely to be subjected to any ongoing air quality issues in Bath.

Further, despite the long-term shift towards less-polluting road vehicles, background traffic growth associated with economic development could delay the betterment of, or even worsen, traffic-related air quality issues. Therefore, even though the fleet composition may become more environmentally friendly over time, absolute growth of vehicles on the network could suppress the air quality benefits that improved fleet composition would be expected to provide.

Within this context, it is critical to understand the interactions between transport, economic development and air quality policy.

2.3.2 Sub-regional Policy and Strategy

Air quality considerations are at the heart of transport and business planning policy and strategy at the sub-regional level. Key documents looking to address air quality in the West of England include:

- The West of England Local Enterprise Partnership's (LEPs) Strategic Economic Plan (2015-30), which establishes the economic vision for the sub-region.
- The West of England LEPs Local Industrial Strategy, which identifies the region's industrial strengths and challenges and presents plans to solidify the foundations upon which the region will thrive.
- The West of England Joint Local Transport Plan (2011-26), which sets out the transport priorities for the sub-region.
- The West of England JSP, which identifies the economic development and growth projections for the sub-region¹⁸.
- The West of England Joint Transport Study (JTS), which provides a clear direction for the long-term development of the transport system in the West of England to 2036 and beyond.

In support of the above policies and strategies, the West of England has been awarded £7 million of GUL Funding to spend over 5 years to encourage the wider use of ultra-low emission transport.

The specific policy objectives of the various development and transport strategies pertinent to the Local Air Quality Plan are outlined in Table 2-2.

¹⁶ NAEI (October 2017), *Air Quality Pollutant Inventories for England, Scotland, Wales, and Northern Ireland: 1990-2015*. http://naei.beis.gov.uk/reports/reports?report_id=895

¹⁷ B&NES, <http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/wiki/air-quality>

¹⁸ At the time of writing, the JSP has been submitted to the Government's Planning Inspectorate for consideration, with aspirations for adoption in early 2019.

2.3.3 Local Policy and Strategy

B&NES has also published local policies and transport plans, as well as contributing to the development and delivery of wider plans for the West of England. Key documents attempting to influence air quality in B&NES include:

- **B&NES Corporate Strategy** - the overarching plan which sets out the Council's strategic direction for the next four years.
- **B&NES Placemaking Plan (PMP)** - guides development up until 2029 and ensures that any developments within this timeframe are high quality, sustainable, well located and supported by appropriate infrastructure.
- **B&NES Getting Around Bath (GAB) Transport Strategy** - aims to 'enhance Bath's unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core. This will enable more economic activity and growth, while enhancing its special character and environment and improving the quality of life for local people'.
- **The B&NES Parking Strategy** - sets out the need to reduce the intrusion of vehicles into urban centres, reflecting concerns surrounding the impact of high numbers of vehicle movements on air quality.
- **The B&NES Public Realm and Movement Strategy for Bath City Centre** - 'designed to give pedestrians, cyclists and public transport vehicles priority over cars, and deliver a network of beautiful, refashioned streets and public spaces'.

The key strategic themes and principles of the existing strategy documents are set out in Table 2-2.

It is also proposed that the Bath Clean Air Plan will be considered within any future relevant local plans, policies and strategies. In addition, in March 2019, B&NES declared a Climate Emergency and passed a motion recognising the urgent need to cut carbon emissions (as a result of burning fossil fuels) and become carbon neutral by 2030.

Table 2-2: Summary of relevant objectives and policies pertaining to air quality issues

| Policy/Strategy Document | Relevant Policies and Objectives |
|--|---|
| <i>Sub-Regional Policy/Strategy Document</i> | |
| West of England LEP Strategic Economic Plan | <ul style="list-style-type: none"> • Recognises the need to improve and protect air quality. • Aims to achieve economic growth and development with no detriment to air quality. |
| West of England LEP Local Industrial Strategy | <ul style="list-style-type: none"> • Recognises that growth should be in a sustainable and low carbon way, addressing air quality and improving health. • Aims for infrastructure plans that address poor air quality and take action against climate change, with transport systems that improve quality of life and health outcomes for all residents. |
| West of England Joint Local Transport Plan (2011-26) | <ul style="list-style-type: none"> • Highlights improving air quality as a key aim in existing AQMA areas within the sub-region (including parts of Bath). • Identifies a strategy to improve air quality, underpinned by three core themes: <ul style="list-style-type: none"> – Information, promotion, awareness and alternatives: in order to raise public consciousness about air quality issues and the linkages between traffic and air quality. – Network management: to reduce congestion. – Emission management: to reduce fuel consumption patterns through use of ‘cleaner’ vehicles and modes. |
| West of England JTS | <ul style="list-style-type: none"> • Recognises that poor air quality, caused by highway traffic, is a major challenge contributing to ill health and premature death, and as a result, recommends an air quality objective (SH2), that seeks to address poor air quality generated by transport sources. • Supports economic growth. • Promotes reduction in carbon emissions. • Promotes improvement in quality of life and a healthy natural environment. • Seeks to contribute to better safety, health & security. • Promotes accessibility. |
| West of England JSP: Towards the Emerging Spatial Strategy Document | <ul style="list-style-type: none"> • Identifies the need to improve air quality as a wider sustainability objective, simultaneous to unlocking economic growth and development. • Aims to ensure that the JSP benefits all sections of our communities. |
| <i>Local Policy/Strategy Document</i> | |
| The District PMP | <ul style="list-style-type: none"> • Policy PCS3 states that developments will only be permitted if they meet certain air quality requirements (for example if situated within an AQMA then the development should comply with the local air quality action plan). • Prevents new developments from exacerbating air quality issues in the area and ensures that air quality issues are fully considered. |

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| Policy/Strategy Document | Relevant Policies and Objectives |
|--|--|
| | <ul style="list-style-type: none"> • Encourages economic development, diversification and prosperity. • Invests in our city, town and local centres. • Pursues a low carbon and sustainable future in changing climate. • Plans for development that promotes health and well-being. |
| B&NES Corporate Strategy | <ul style="list-style-type: none"> • Recognises that parts of the local authority area suffer from poor air quality and highlights the need for an Air Quality Action Plan to ameliorate these issues. |
| GAB: A Transport Strategy for Bath | <ul style="list-style-type: none"> • Improving air quality & health, reducing vehicle carbon emissions. • Supporting and enabling economic growth, competitiveness and jobs. • Promoting sustainable mobility. • Widening travel choice. • Safeguarding and enhancing the unique historic environment and World Heritage Site status. |
| Parking Strategy | <ul style="list-style-type: none"> • Seeks to contribute to air quality improvements through recommendations such as: <ul style="list-style-type: none"> – Introducing standards for EVs and car club bays in new developments. – Reducing off-street parking provision in the city centre. – Amending the charging strategy. – Reducing traffic in the most congested areas and improving air quality. |
| Public Realm and Movement Strategy for Bath City Centre | <ul style="list-style-type: none"> • Aims to transform Bath into a pedestrian friendly city, reducing vehicle movements and air pollution. • Contributes to a revitalised economy. • Redefines Bath as a healthy, ethical and sustainable city. • Creates the canvas for public life and well-being. • Enhances the potential of Bath as a place, to benefit visitors, businesses, and the community through enjoyment, health and wellbeing. • Improvement of public information and presentation of the city's heritage. • Addresses traffic movement within and around the city centre of Bath. Working towards a walkable city and becoming the UK's most pedestrian friendly city. |

2.4 Assessment of Baseline Transport and Air Quality Conditions

2.4.1 Transport Conditions in Bath

2.4.1.1 Modelled Scenarios

This section of the FBC discusses the results of the modelling without the CAP in place, in order to understand what level the problem would be in the future without any positive interventions. This forms part of a wider set of modelled scenarios which are described below for clarity. The modelled scenarios are as follows:

- Current and base models representing 2017 conditions.
- Baseline model representing 2021 conditions without a CAP in place.
- CAZ scenario models representing 2021 conditions with a CAP in place.

2.4.1.2 Traffic Model Specification

Road transport is recognised to be a key driver of air quality issues at both the national, and even more markedly, at the local level in the context of Bath. Changes in transport conditions are therefore, a key driver of the air quality modelling and baseline results outlined below.

In order to determine current and baseline transport conditions across B&NES, traffic modelling was undertaken using a SATURN highway model, the extent of which is shown in Figure 2-.2.



Figure 2-2: Bath model extent

To be consistent with the air quality model, which is verified using the most recent air quality monitoring data, the base year for transport modelling is 2017. This model was developed from an existing model of Bath based on a comprehensive set of traffic surveys, following DfT guidance. The development of the original model is summarised in FBC-12, FBC-13 and FBC-17 in Appendix E of this FBC.

A second year is modelled, representing the year in which compliance is expected to be achieved, and known as the baseline year. Based on the outcomes of the modelling, and an understanding of the time taken to deliver each proposed scheme, a baseline year of 2021 has been modelled. This model takes into account housing and economic growth in B&NES and the wider West of England, which are expected to contribute to an overall growth in traffic flows and changes to highway infrastructure. The schemes and developments included are summarised in FBC-13 'T3 Methodology Report' in Appendix E of this FBC.

The 2017 traffic modelling was informed by Automatic Number Plate Recognition (ANPR) surveys undertaken in November 2017. Details of these surveys are provided in FBC-13 'T3 Methodology Report' in Appendix E of this FBC. The base year vehicle fleet information was determined from the 2017 ANPR sites directly and this has been adjusted to 2021 and 2031 using the Defra forecasts.

The core transport modelling inputs and outputs are outlined in FBC-12, FBC-13 and FBC-17 in Appendix E of this FBC. Outputs including traffic volumes and speeds are adopted as key inputs into the air quality modelling process summarised in the following section.

2.4.2 Air Quality in Bath

Section 2.2 establishes that the key drivers for improving air quality in B&NES are public health and the obligation to achieve European Air Quality Limit Values and national AQOs. Non-compliance with the EU's Limit Values and the UK Government's AQOs for NO₂ represents a significant threat to public health and B&NES legal and regulatory responsibilities. As such, it is essential that a robust understanding of the current and future, scale and extent of exceedances is established under the reference case informed by baseline air quality modelling.

2.4.2.1 Monitoring Data in Bath

B&NES declared an AQMA in 2002 in Bath for the annual mean NO₂ objective which covers the main arterial routes and city centre roads. The designation of an AQMA does not require that a CAZ be put in place; but it does require the local authority to take action and work towards reducing levels of pollution.

Air quality monitoring in Bath is comprehensive and long standing. Bath's monitoring network is focused on NO₂, Particulate Matter (PM_{2.5}) and (PM₁₀). The air quality situation in Bath in 2017 was previously presented in Figure 2-1 showing concentrations of NO₂ at locations within the city.

B&NES operates four automatic monitoring stations within its area, two of which are located on or close to London Road. The Council also operates a large number of diffusion tube sites across its area, with 41 of these sites being used in the analysis presented in this report. In January 2018 a further 23 diffusion tubes were deployed in and around Bath, this was followed by a further 20 in August/September 2018 in 'areas of concern'. In 2019 4 sites were removed due to low recorded concentrations, with 44 new sites added and 39 sites in total made triplicate. Some adjustments were also made to the locations of existing tubes, to add to the evidence base on which this study is undertaken.

The highest measured concentrations of NO₂, adjusted to a relevant receptor, were recorded on London Road (Lambridge DT55 and Anglo Terrace DT90) and Dorchester Street (DT42), where annual mean NO₂ concentrations in 2017 were all above 50 µg/m³. Details of the monitoring sites, along with adjusted modelled concentrations of NO₂, are shown in Table 2-3.

Table 2-3: Monitoring sites and adjusted NO₂ concentrations

| Monitoring Site ID | Location | Distance from kerb (m) | In Canyon? | On gradient? | Measured NO ₂ Concentration 2017 (µg/m ³) | Adjusted Modelled Concentration 2017 (µg/m ³) |
|--------------------|----------------|------------------------|------------|--------------|--|---|
| CM1 | London Road | 5.00 | Yes | No | 44.8 | 42.5 |
| CM2 | Guildhall | 4.60 | Yes | No | 30.3 | 35.1 |
| CM3 | Windsor Bridge | 2.00 | No | No | 32.7 | 37.9 |

| Monitoring Site ID | Location | Distance from kerb (m) | In Canyon? | On gradient? | Measured NO2 Concentration 2017 ($\mu\text{g}/\text{m}^3$) | Adjusted Modelled Concentration 2017 ($\mu\text{g}/\text{m}^3$) |
|--------------------|---------------------------------|------------------------|------------|--------------|--|---|
| DT01 | High Street | 3.60 | Yes | No | 36.0 | 35.9 |
| DT03 | Broad Street | 3.50 | Yes | Yes | 47.5 | 44.2 |
| DT04 | George Street | 2.20 | Yes | No | 35.7 | 30.3 |
| DT05 | Gay Street – Top | 5.70 | Yes | Yes | 36.2 | 31.3 |
| DT08 | Windsor Bridge | 4.00 | No | No | 34.4 | 35.9 |
| DT09 | Upper Bristol Road | 1.00 | Yes | No | 40.2 | 35.5 |
| DT11 | London Road | 1.80 | Yes | No | 38.1 | 41.9 |
| DT14 | Bathwick Street | 2.20 | Yes | No | 43.6 | 46.5 |
| DT15 | Beckford Road | 0.25 | No | Yes | 33.6 | 32.1 |
| DT16 | Warminster Road | 1.95 | No | Yes | 36.0 | 34.0 |
| DT17 | Widcombe School | 2.20 | Yes | No | 35.4 | 37.1 |
| DT18 | Widcombe High Street | 3.90 | Yes | No | 28.2 | 25.0 |
| DT20 | Wells Road | 4.50 | Yes | No | 51.7 | 45.2 |
| DT21 | Wells Road /Upper Oldfield Park | 1.65 | No | Yes | 43.5 | 41.7 |
| DT26 | Upper Wellsway | 3.80 | No | No | 32.1 | 25.4 |
| DT34 | Newbridge Road | 1.96 | Yes | No | 37.6 | 37.6 |
| DT35 | Newbridge Hill | 5.70 | No | Yes | 37.8 | 36.0 |
| DT37 | Charlotte Street | 0.25 | Yes | Yes | 37.8 | 32.4 |
| DT39 | Manvers Street | 1.90 | Yes | No | 38.4 | 42.7 |
| DT42 | Dorchester Street | 0.35 | Yes | No | 58.2 | 54.0 |
| DT43 | St. James Parade | 1.20 | Yes | No | 45.9 | 48.5 |
| DT45 | James Street West | 2.10 | Yes | No | 39.9 | 37.9 |
| DT46 | Little Stanhope Street | 0.35 | Yes | Yes | 36.6 | 39.8 |
| DT47 | Lansdown Crescent | 3.30 | No | Yes | 30.7 | 29.1 |
| DT48 | Paragon | 2.30 | No | No | 38.4 | 28.5 |
| DT51 | Cleveland Place West | 0.40 | Yes | Yes | 44.6 | 40.1 |
| DT52/53/54 | Walcot Terrace | 0.40 | Yes | No | 44.7 | 41.8 |
| DT55 | Lambridge | 1.70 | No | Yes | 46.1 | 51.5 |
| DT60 | Victoria Terrace | 2.20 | Yes | No | 46.2 | 45.8 |
| DT61 | Morley Terrace | 1.70 | No | No | 38.5 | 39.0 |
| DT62 | Argyle Terrace | 0.90 | Yes | No | 44.8 | 35.1 |
| DT84 | Bearflat | 2.20 | Yes | No | 32.9 | 29.8 |
| DT85 | RUH North | 0.90 | Yes | No | 32.0 | 27.7 |

| Monitoring Site ID | Location | Distance from kerb (m) | In Canyon? | On gradient? | Measured NO2 Concentration 2017 ($\mu\text{g}/\text{m}^3$) | Adjusted Modelled Concentration 2017 ($\mu\text{g}/\text{m}^3$) |
|--------------------|---------------------------------|------------------------|------------|--------------|--|---|
| DT87 | Oak Street | 2.10 | Yes | No | 33.4 | 38.3 |
| DT88 | Angel Place | 2.60 | No | No | 42.0 | 32.8 |
| DT90 | Anglo Terrace | 1.30 | Yes | No | 56.6 | 62.9 |
| DT93 | Lower Camden Place, Camden Road | 0.15 | Yes | Yes | 29.4 | 28.0 |
| DT127 | Gays Hill, Camden | 0.45 | Yes | Yes | 30.6 | 29.7 |
| DT142 | Prior Park Road | 1.20 | Yes | Yes | 40.5 | 37.6 |
| DT143 | Rackfield Place | 3.90 | No | No | 32.3 | 28.7 |
| DT145 | Lansdown Road | 0.45 | Yes | Yes | 33.3 | 37.9 |

The section below provides information on the source apportionment of emissions at key locations in central Bath, including the three locations mentioned above with the highest recorded concentrations of NO₂ (London Road: Lambridge DT55 and Anglo Terrace DT90; and Dorchester Street DT42).

2.4.2.2 Source Apportionment

Road transport is the main contributor of emissions of NO_x at roadside locations, and therefore the predominant cause in locations where NO₂ concentrations are not complying with Limit Values or AQOs. According to NAEI estimates, around a third of the UK NO_x emissions in 2015 arose from road transport, most of which came from diesel vehicles (NAEI, 2017).¹⁹ Contributions from transport to NO_x emissions in Bath are higher than the national average due to the high number of vehicles travelling in built-up areas.

No other major sources of NO_x (for example from energy production, domestic combustion or other industrial processes) have been identified within Bath. Other sources of NO_x are included in the background concentrations measured well away from any significant sources of pollution, such as busy roads, railway lines²⁰ or industrial sites.

The 2017 source apportionment in key locations in central Bath, and an average across the city, is shown in Figure 2-3. For further information on the measured emission concentrations at these locations refer to Table 2-3 in the section above.



Figure 2-3: Source apportionment at key locations with average across the city (2017)

¹⁹ NAEI (October 2017), *Air Quality Pollutant Inventories for England, Scotland, Wales, and Northern Ireland: 1990-2015*. http://naei.beis.gov.uk/reports/reports?report_id=895

²⁰ Note that Appendix D considers diesel trains in the context of air quality concentrations in B&NES and concludes that in the context of locations relevant to the Limit Values or AQOs, the contribution from diesel trains is likely to be minimal. See Appendix X for more details.

2.4.2.3 Air Quality Model Specification

The air quality modelling is underpinned by the current Emissions Factor Toolkit (EFT) Version (v8.0.1a) for emissions modelling, and the Defra-approved ADMS-Roads (version 4.1) for dispersion modelling. The model covers a study area that includes Bath city centre, the entirety of the AQMA and the wider city. Figure 2-4 illustrates the study area, which incorporates all densely populated areas of the city, including those areas not covered by the proposed charging zone. This is because very small changes in concentrations applied across a large population base can account for significant health impacts.

The model is run at receptors representing both locations relevant for the AQOs (façades of residential buildings, schools, hospitals etc.) and locations designed to be comparable to the Government’s PCM model, which is used to report compliance with the Limit Values. These receptors have been presented separately as there are important differences.

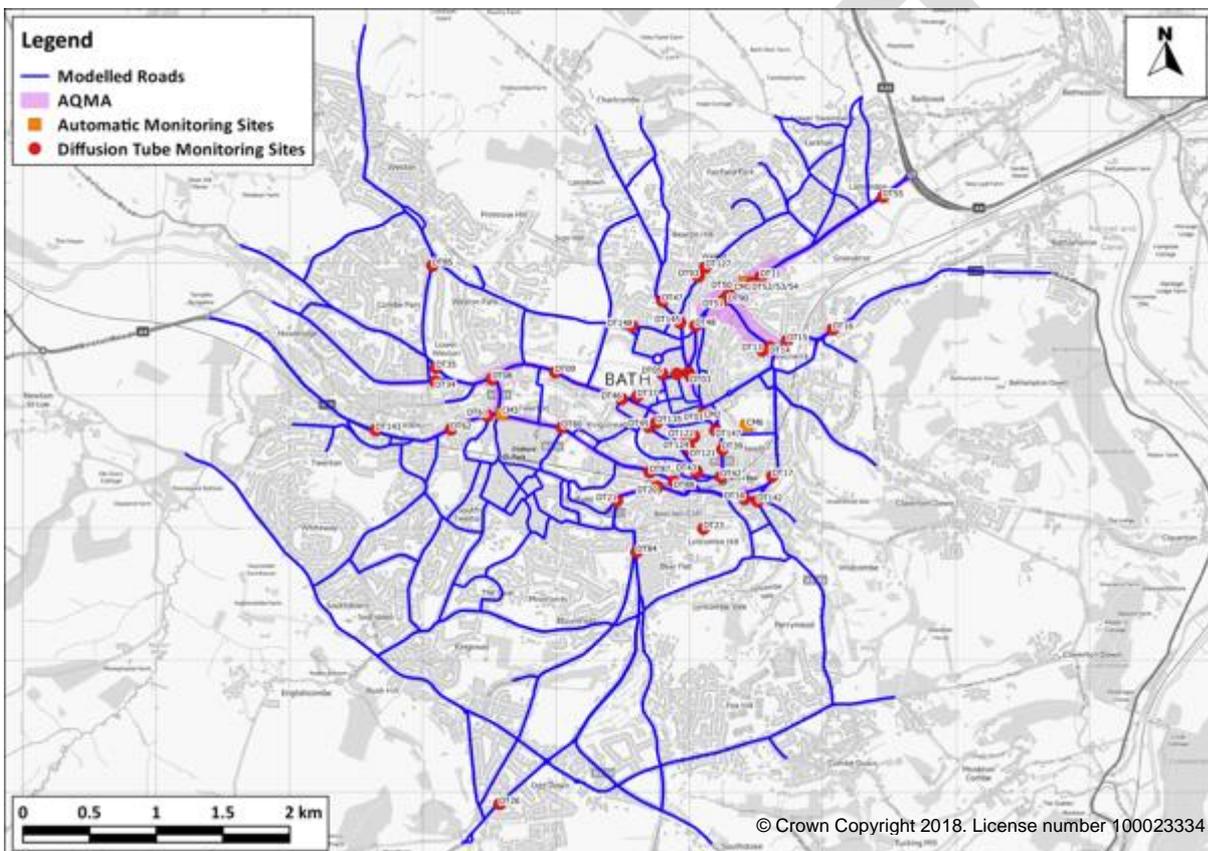


Figure 2-4: Study area, AQMA and 2017 monitoring sites

2.4.2.4 Baseline Results – Base Year (2017)

The predicted annual mean concentrations of NO₂ show exceedances in 2017 at locations relevant to the AQOs, Figure 2-5, and at each of the relevant receptor locations adjacent to roads within the PCM model, Figure 2-6. The exceedances are all along busy roads, particularly within street canyons (where a street is flanked by buildings on both sides) and close to junctions. The modelled results have been verified through comparison with monitored data.

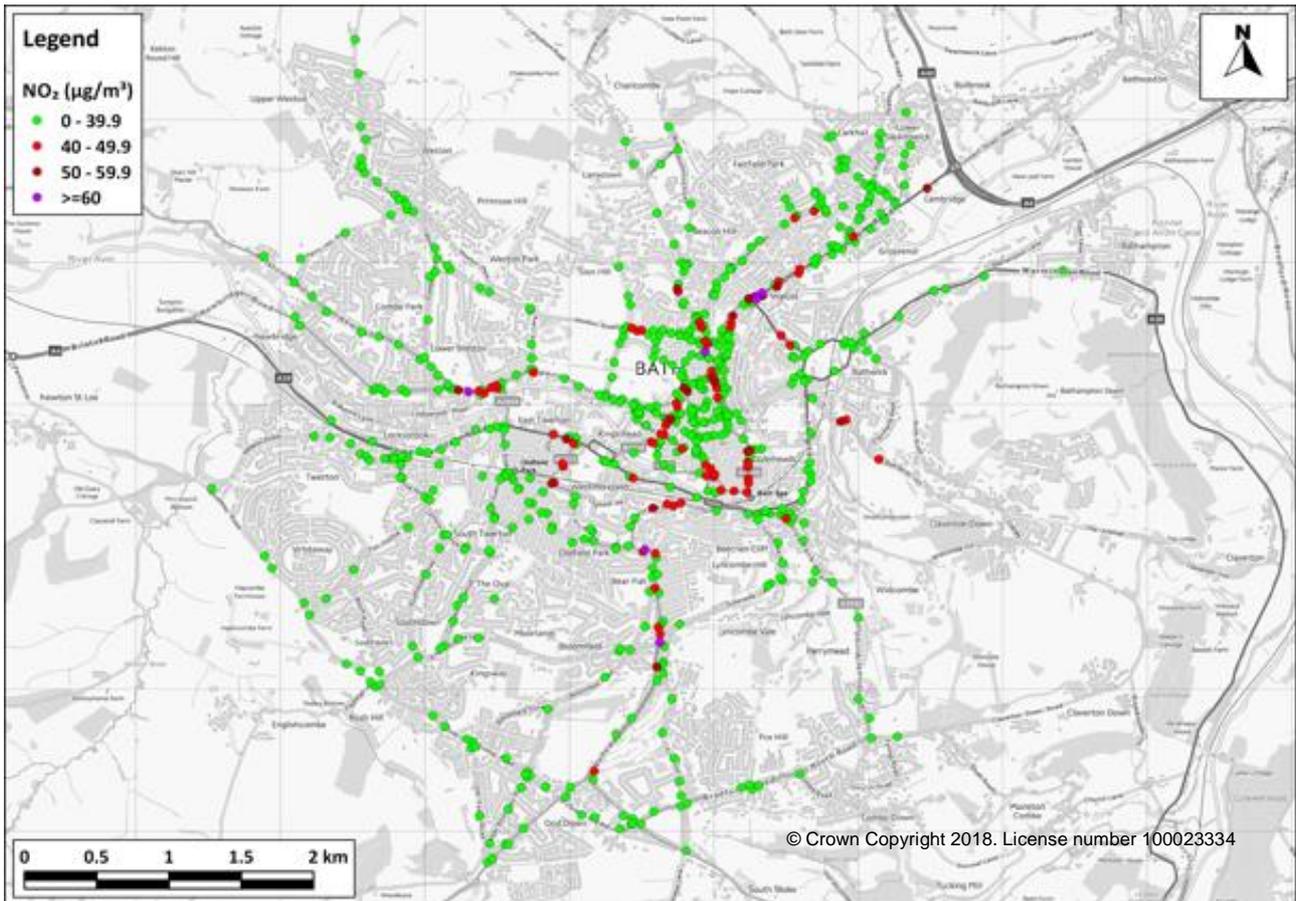


Figure 2-5: Predicted NO₂ concentrations in 2017 at receptor locations relevant to the national air quality objective

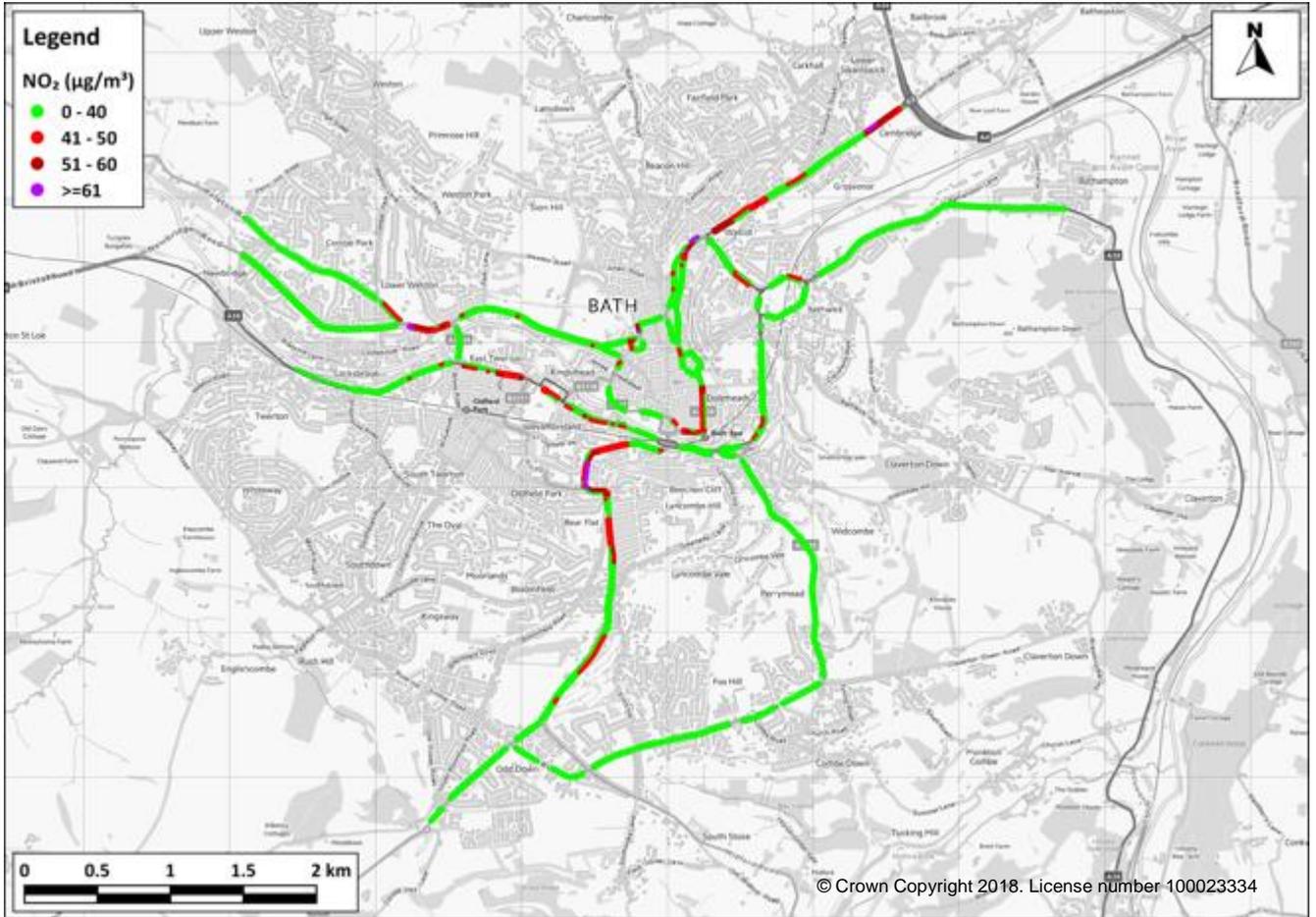


Figure 2-6: Predicted NO₂ concentrations in 2017 at PCM-equivalent receptor locations

2.4.2.5 Baseline Results – Compliance Year (2021)

The predicted annual mean concentrations of NO₂ still show exceedances in 2021 at locations relevant to the AQOs, shown in Figure 2-7, although these are fewer in number than in 2017. The exceedances are all along busy roads, particularly within street canyons and close to junctions.

The predicted annual mean concentrations of NO₂ at PCM-equivalent receptors still show exceedances of the annual mean Limit Value in 2021, shown in Figure 2-8, although these are fewer in number than in 2017.

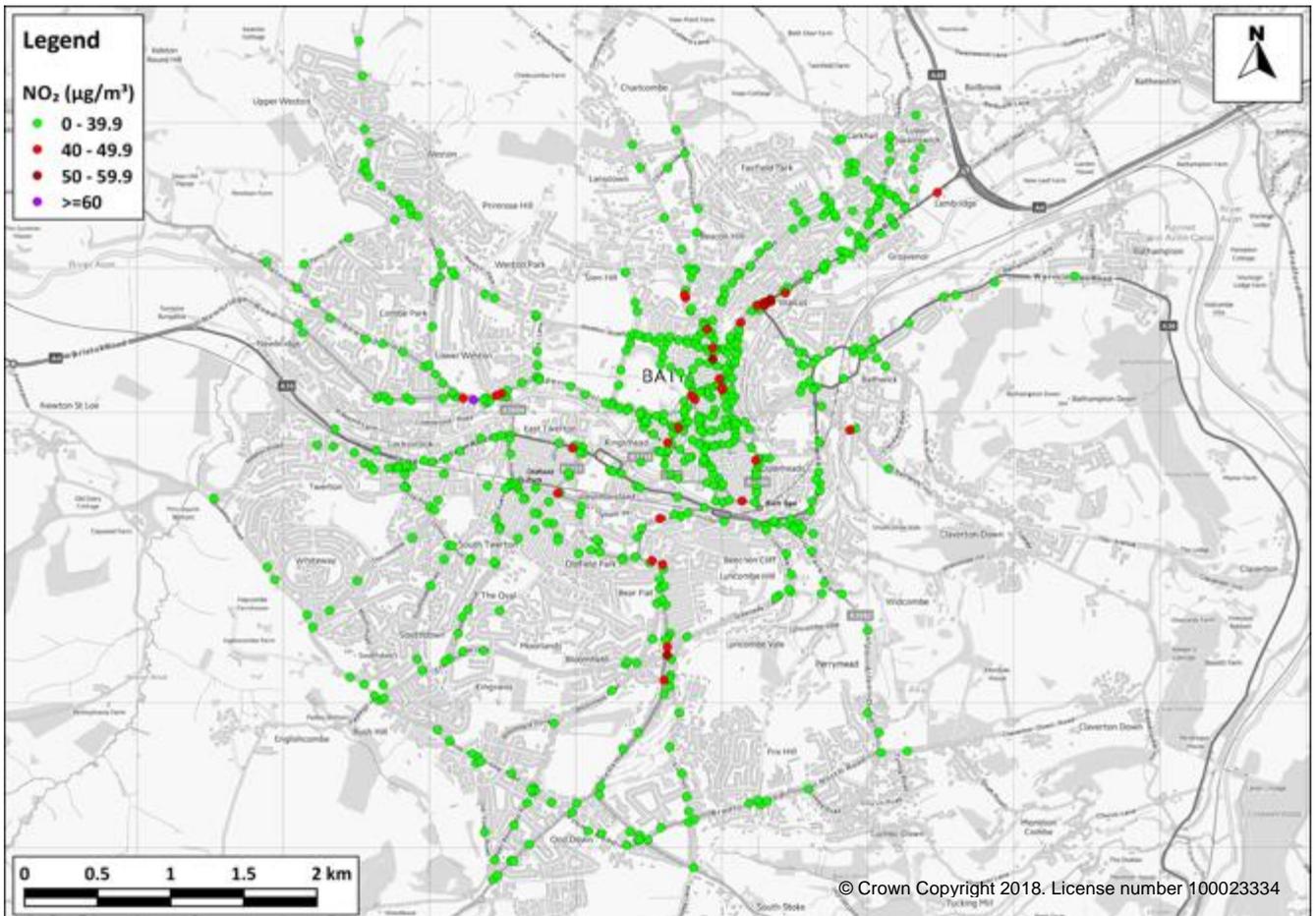


Figure 2-7: Predicted NO₂ concentrations in 2021 at receptor locations relevant to the national air quality objective

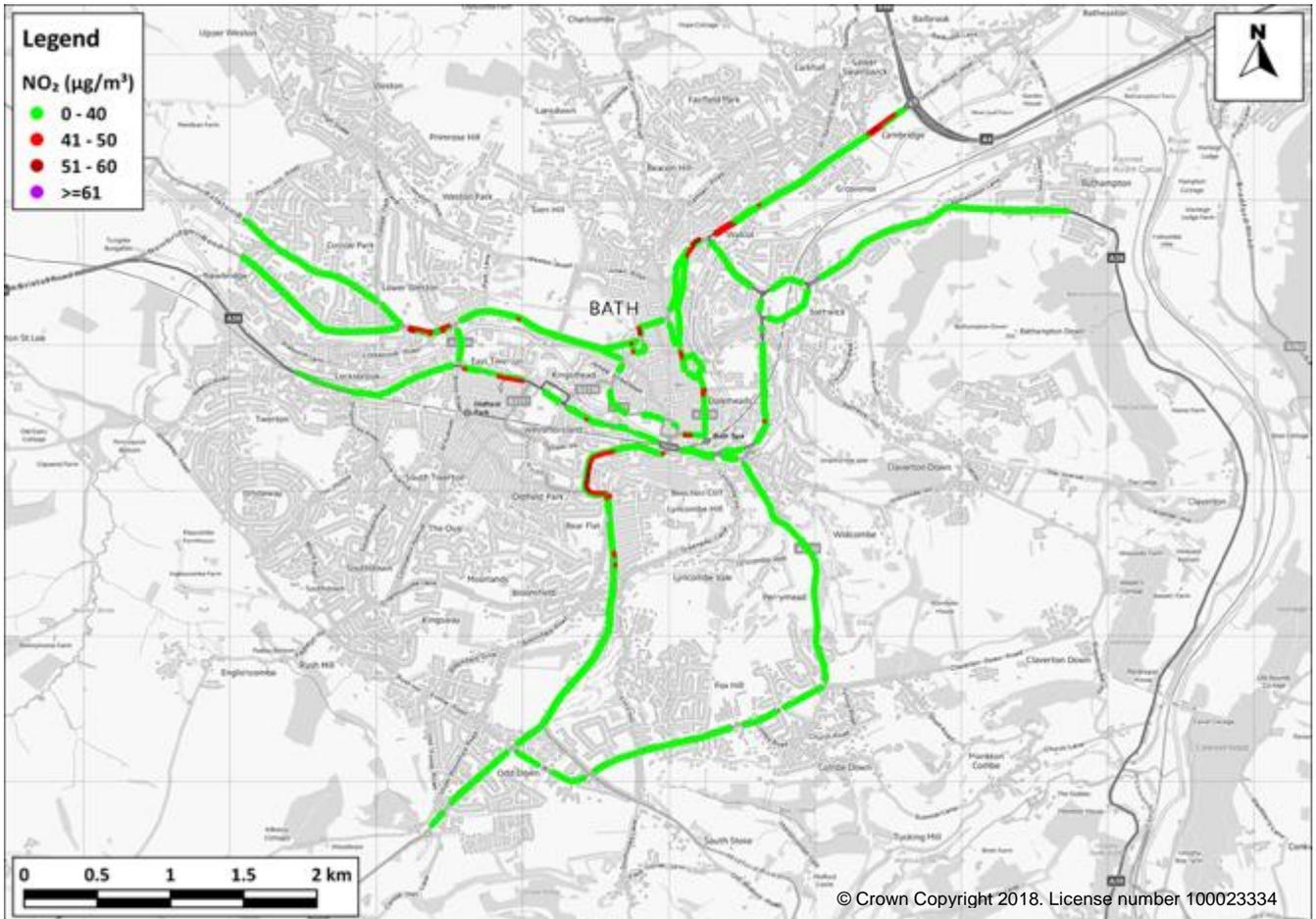


Figure 2-8: Predicted NO₂ concentrations in 2021 at PCM-equivalent receptor locations

2.4.2.6 Summary

Currently, levels of NO₂ are breaching legal limits in Bath, where national modelling suggests that, without intervention, the exceedance of the annual mean Limit Value for NO₂ on London Road would remain until 2021. Further local modelling, undertaken using the results of local ANPR and stated preference surveys and verified using local monitoring data, shows that there would be greater and more widespread exceedances within Bath in 2021 without intervention. Source apportionment attributes the main source of NO_x pollution in Bath to diesel vehicles.

Therefore, to achieve compliance with the annual mean Limit Value for NO₂, in the shortest possible time, or by 2021 at the latest, intervention in the form of measures to reduce air pollution from road traffic is required.

2.5 Spending Objectives and Success Factors

A robust case for change requires a thorough understanding of what the project is seeking to achieve. The objectives and success factors identified for the project need to be rooted in the local and strategic context as presented in Sections 2.2 and 2.3, and specific issues and problems identified in Section 2.4, which the project seeks to address.

Within this context the primary spending objective of the CAP is to deliver a scheme that leads to compliance with the EU's NO₂ concentration Limit Values in the shortest possible time. This is in accordance with JAQU's Options Appraisal Guidance and is in line with the issues raised in Section 2.2 above.

A secondary spending objective is also proposed; to deliver a scheme which leads to compliance with the LAQM AQOs as set out in the Air Quality (England) Regulations (SI 2000/928 as amended). The difference between Limit Values and LAQM AQOs are set out in Section 2.2.3 of this document.

Supplementary objectives for the preferred option include:

- Demonstrating value for money.
- Minimising the impacts on local residents and businesses, including disadvantaged groups such as low-income households.
- Minimising the impacts on economic growth and development in Bath, thus helping to accelerate the transition to a lower emission economy and creating a healthy place to live, visit and work.

To support the realisation of the spending objectives documented above, a number of Critical Success Factors (CSFs) were identified as part of the SOC process to appraise and refine the initial longlist into a shortlist of options considered at OBC stage. These CSFs can be differentiated into two groups:

- **Primary CSFs** – combining the primary and secondary spending objectives, the primary CSFs seek to deliver compliance with NO₂ air quality Limit Values and AQOs in the shortest possible timescales. At SOC stage, only those options that achieved this CSF (based on modelling available at that time) were shortlisted for further analysis. All options were reassessed against this CSF within the OBC, before being considered against the secondary CSFs listed below.
- **Secondary CSFs** – related to the supplementary spending objectives listed above, the following secondary CSFs were used at SOC stage to undertake a comparative assessment of shortlisted options, and to inform the identification of a preferred option at OBC stage:
 - Strategic:
 - All trip purposes treated equitably.
 - Compliance with Defra CAZ framework, including minimum requirements.
 - Economic:
 - Mitigate financial impact on low income groups.
 - Maximise health improvements of low income groups.
 - Net economic benefit.
 - Improve general public health.
 - Commercial:
 - Is the market able to supply in the time available?
 - Financial:
 - Likelihood of revenue equating to implementation/operational costs.
 - Upfront capital required for scheme.
 - Risk of financial penalty to B&NES.

- Management:
 - Public acceptability.
 - Local, regional and national political acceptability.

2.6 Case for Change

A compelling case for change requires:

- Identification of an existing problem(s) through reference to prevailing baseline conditions affecting Bath;
- Establishing a rationale for intervention based around resolving the identified problem(s); and
- Outlining the expected outcomes and impacts associated with intervening.

In the case of air quality in Bath, the current problem that needs to be addressed is the identified exceedance of the legal annual mean Limit Value for NO₂. At the UK government's monitoring station on London Road, B&NES reported an exceedance in 2017 and forecasts based on the PCM model predicted that this exceedance would remain until 2021. More detailed, local monitoring data shows greater and more widespread exceedances than are indicated within the PCM model (for European regulations) in Bath, and also widespread exceedances of the LAQM AQOs. This position is validated by baseline modelling presented in Section 2.4. Further, the existence of an air quality problem in Bath is recognised by the majority of local people, see Section 2.9. In the absence of suitably targeted interventions, the exceedances are expected to persist, meaning an improvement in public health will not be accelerated in Bath. Therefore, B&NES would fail to comply with its regulatory responsibilities as publicly-acknowledged air quality problems continue.

B&NES has received formal instruction from the Government to achieve compliance with the legal limit in the shortest time possible, in accordance with the High Court Order in November 2016²¹. Therefore, an intervention is required to alleviate air quality issues that contribute to significant public health and environmental problems within Bath. B&NES is considering implementation of a CAZ, including both charging and non-charging measures, in order to achieve the required improvement in air quality and public health. Such a scheme represents the best intervention mechanism for achieving compliance, because it will directly facilitate changes in travel patterns and travel behaviour, thus reducing the influence of the primary cause of air quality problems - highway traffic. The rationale for a CAZ-led intervention is predicated on the ability of a CAZ scheme to quickly reduce the contribution of highway traffic to air quality, consequently leading to reduced air pollution and compliance with national and European limits for NO₂. As established in Section 2.9, local people generally accept and support a charging CAZ in principle. However, they also identify the need for complementary non-charging measures (including public transport improvements and congestion reduction measures/traffic flow improvements).

As noted above and discussed in Section 2.4.2.6, the primary outcome associated with the intervention is achieving compliance with national and European standards for air quality in the shortest possible timeframe. This is expected to maximise public health benefits associated with the scheme. A range of secondary outcomes and impacts can also be defined with reference to the other spending objectives and success factors listed in Section 2.4.2.6.

In light of the above, the case for change can be summarised as:

- B&NES currently fails to meet national and European standards for air quality, with existing exceedances for NO₂ expected to persist in the absence of intervention.
- Intervention is required to target traffic patterns and behaviour in Bath, given that road transport is recognised as the primary contributor to air quality issues that subsequently result in significant public health issues and the failure of B&NES to comply with its regulatory responsibilities.
- By intervening, B&NES is seeking to meet their legal obligations for air quality in the shortest possible time, thus maximising improvement to public health.

²¹ November 2016 in R (ClientEarth) (NO₂) V Secretary of State for Environment Food and Rural Affairs [2016] EWHC 2740 (Admin)

2.7 Option Assessment Process

2.7.1 Options Assessment Summary

The options assessment process from SOC through to FBC, including key stages and options, is summarised in Figure 2-10. Further details are presented in Sections 2.7.2 and 2.7.3.

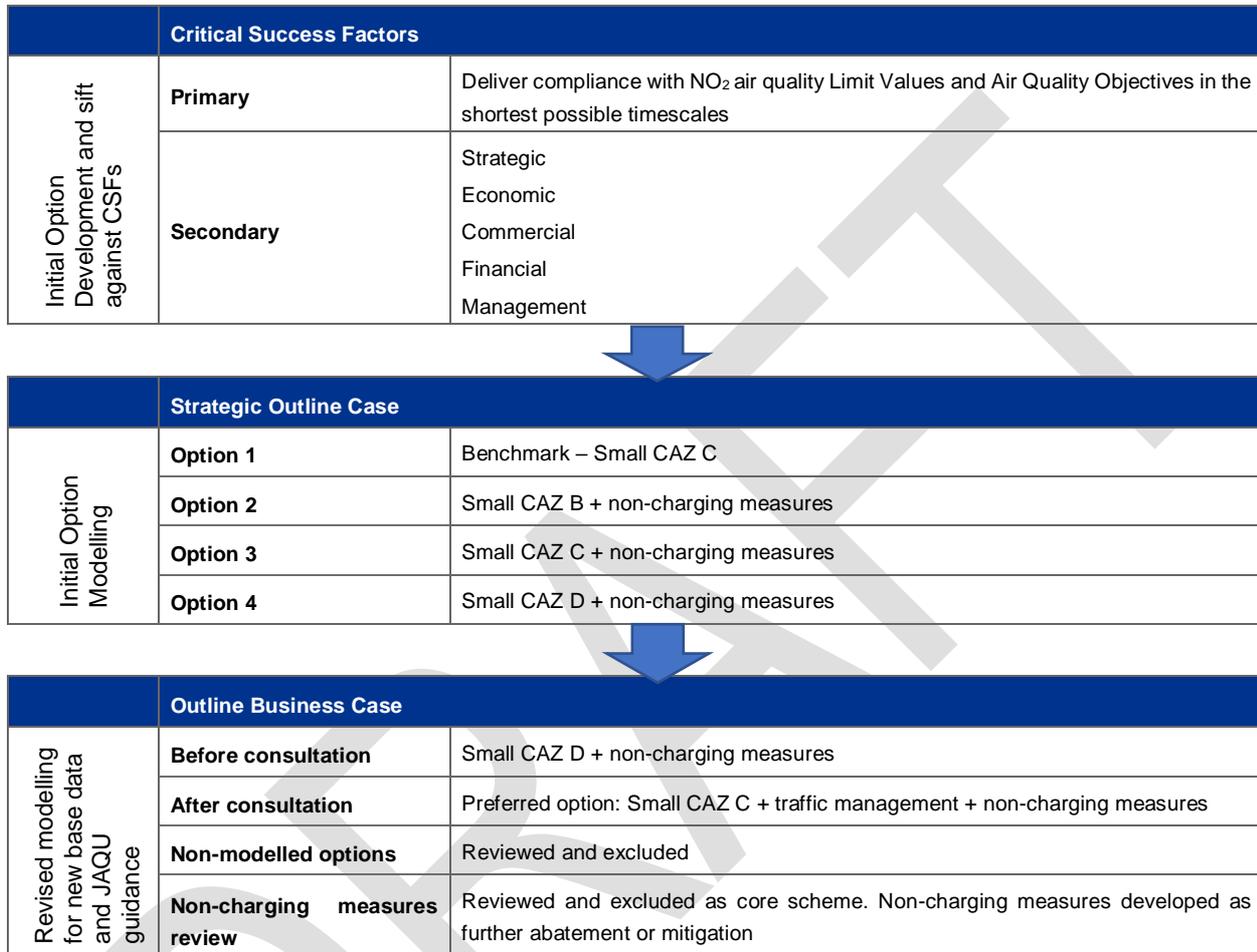


Figure 2-10: Options assessment process

2.7.2 SOC Options Analysis

In order to ameliorate the problems identified in Section 2.4 and driven by the spending objectives established in Section 2.4.2.6 (focused on achieving air quality compliance and public health improvements), the SOC established a long list of charging and non-charging measures. The charging measures were influenced by the recommendations of the national plan, which sets out actions to reduce concentrations of NO₂ to meet the Limit Values and AQOs in the shortest time possible. The national plan identifies that for the majority of non-complying areas, a CAZ is the most effective route to compliance of annual mean NO₂ with legal limits. Defra’s vision for Clean Air Zones is: *“Clean Air Zones improve the urban environment to support public health and the local economy, making cities more attractive places to live, work, do business and spend leisure time. They support cities to grow and transition to a low emission economy thus ensuring these benefits are sustainable for the long term.”*

A CAZ defines an area where targeted action is taken to improve air quality through the implementation of a charging mechanism that discriminates against those vehicles that contribute most to exceedances of air quality standards. As such, a charging system is established which charges vehicles, according to the vehicle emission

standards to enter or move within the defined CAZ area. Compliant vehicles will not be subject to charge. The intention of an intervention of this type is to accelerate change in the vehicle fleet by promoting the purchase of compliant vehicles. Further, the intervention seeks to transform travel behaviour by achieving mode shift towards public transport or other sustainable modes as an alternative to driving. The expected outcome is compliance with the identified air quality standards within the shortest possible time, as well as facilitating the transition to a lower emission economy.

The charging and non-charging measures were evaluated in line with the CSFs outlined in Section 2.4.2.6. Based on this evaluation process, underpinned by the primary spending objective, the long list of measures was reduced to a short list of both charging and non-charging measures that were combined into packages to take forward for further assessment. A total of 14 non-charging measures and 3 charging measures remained on the shortlist at SOC stage.

The assessment at SOC stage demonstrated that the most successful charging measures across both primary and secondary CSFs were the small Class B, C and D CAZ options. Further, the options assessment process enhanced the performance of the charging measures by supplementing these options with relevant non-charging measures. Based on this approach, the SOC recommended that the following four options should be taken forward in the OBC for more detailed assessment:

- **Option 1** – Benchmark Option – Small Class C CAZ. In line with JAQU's' Option Appraisal Guidance, the benchmark option is defined as the lowest class required to achieve compliance in the shortest possible timescales.
- **Option 2** – Small Class B CAZ (charging higher emissions buses, coaches, taxis and HGVs) with complementary non-charging interventions including walking/cycling priority schemes, cycle parking, public transport route improvements, increased use of variable message signage (VMS), targeted traffic management, some sunset periods, promotion of low emissions vehicles (LEVs).
- **Option 3** – Small Class C CAZ (charging higher emissions buses, coaches, taxis, PHVs, HGVs and LGVs) with complementary non-charging interventions (as listed above).
- **Option 4** – Small Class D CAZ (charging higher emissions buses, coaches, taxis, HGVs, LGVs and cars) with complementary non-charging interventions (as listed above, plus expanded GUL packages, car sharing priority parking, car club expansion).

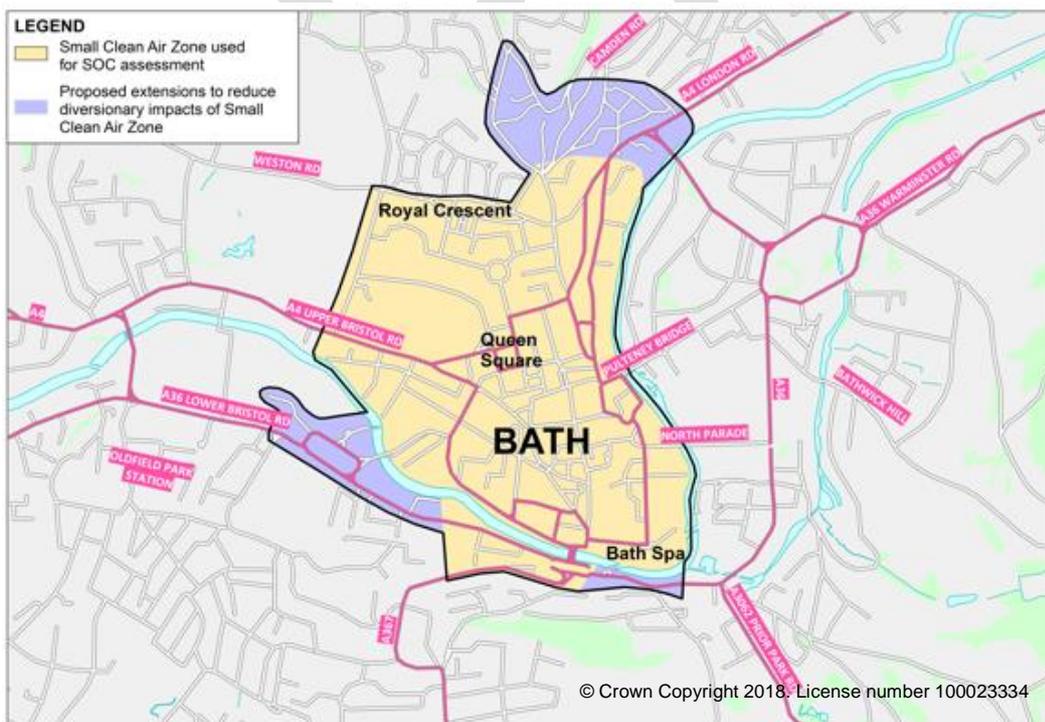


Figure 2-11: Small Zone Boundary in SOC**2.7.3 OBC Options Analysis****2.7.3.1 Options assessment**

The shortlisted options established at the SOC stage and described above were revisited and re-evaluated in the Economic Case within the OBC based on the availability of more detailed transport and air quality modelling. The options assessment continued to be driven by improving health as reflected in the primary spending objective (and related primary CSF) associated with delivering compliance with NO₂ air quality Limit Values and AQOs in the shortest possible timescales. The options assessment in relation to supplementary spending objectives and secondary CSFs were considered in more detail for those options that demonstrate that the primary spending objective is satisfied. In light of the key policy drivers and resulting national, sub-regional and local policies implemented as a result, it was identified that a CAZ is the most effective route to compliance in locations such as Bath.

More detailed and sophisticated modelling was undertaken as part of the OBC analysis, which garnered results that were significantly different to those generated at SOC stage. Modelling at OBC stage incorporated newly-available local data from ANPR and stated preference surveys, along with further refinements to the traffic modelling approach. Traffic data was derived following the same approaches outlined in Section 3.2.1 of this FBC. The shortlisted CAZ options were assessed through an iterative process of Transport Model / Air Quality Model scenario runs, pivoting from the following charging scenarios:

- 2020 CAZ Class D, with a £7.50 charge for Cars/LGVs/Taxis and £100 for HGVs/Coaches/Buses.
- 2021 CAZ Class D, with a £7.50 charge for Cars/LGVs/Taxis and £100 for HGVs/Coaches/Buses.
- 2021 CAZ Class C, with a £9.00 charge for LGVs/Taxis and £100 for HGVs/Coaches/Buses.
- 2021 CAZ Class D, with a £9.00 charge for Cars/LGVs/Taxis and £100 for HGVs/Coaches/Buses.

At this stage, all four shortlisted options identified as part of the SOC process were taken forward for more detailed assessment relating to the primary spending objective within the economic case. A CAZ Class D scheme (£7.50/£100) was tested for 2020 and found not to achieve compliance. The same scheme was tested for 2021 and also failed to achieve compliance, but with concentrations only marginally in exceedance of the Limit Values. As a result, no further schemes were tested in 2020 and instead the focus was on determining a scheme which could achieve compliance in 2021. A CAZ Class D with a higher charge for light vehicles (£9/£100) was tested for 2021 and this did achieve compliance. A CAZ Class C with the same charges was also tested to check whether this could provide sufficient air quality improvement, but the results demonstrated that it did not achieve compliance. As a result, a CAZ Class D with a £9 charge for light vehicles was presented for public consultation in Autumn 2018. A summary of the public consultation outcome is presented in Section 2.9.2 of this FBC.

Within this context, a CAZ Class D scheme with the higher charge for light vehicles (£9/£100) was found to be compliant with the primary spending objective and primary CSF, i.e. to deliver compliance with NO₂ air quality Limit Values and AQOs in the shortest possible timescales.

A CAZ Class C with the same charges was initially ruled out due to the difficulty of mitigating two exceedances with traffic management, however refinements to the baseline air quality modelling to improve how gradients are represented were made following public consultation on a Class D CAZ. FBC-11 'AQ3 Modelling Report' in Appendix D of this FBC provides details of the air quality modelling. Subsequently the revised assessment for a Class C CAZ indicated that a £9 charge for Taxis, PHVs and LGVs and £100 charge for HGVs/Coaches/Buses resulted in just a single exceedance at Gay Street. As the second exceedance at London Road was now no longer expected, it was considered that traffic management measures at the Gay Street location should be investigated further as a way to mitigate the one remaining exceedance.

Drawing on parallel work undertaken to look at the diversionary and air quality impacts of delivering a series of traffic management schemes in the City Centre as part of the B&NES 'Public Realm and Movement Strategy', it was found that targeted traffic management measures in Queen Square would reduce the traffic using the critical section of Gay Street and bring about compliance in this location. The traffic management measures, explored in

FBC-09 'Queen Square Traffic Management Scheme' in Appendix C of this FBC, include additional signal controls in the north west and south west corners of Queen Square. This enables the traffic using Gay Street to be restrained to a level capable of reducing the remaining NO₂ emission exceedance at Gay Street from 42µg/m³ to 36.9 µg/m³ (see Table 2.4).

Table 2.4: Comparison of air quality modelling results at Gay Street with and without traffic management measures

| Location | 2017 base (µg/m ³) | 2021 base (µg/m ³) | 2021 CAZ C (µg/m ³) | 2021 CAZ C with TM (µg/m ³) | 2021 CAZ D (µg/m ³) |
|------------|--------------------------------|--------------------------------|---------------------------------|---|---------------------------------|
| Gay Street | 60.1 | 50.9 | 42 | 36.9 | 40.4 |

The OBC identified that a Class D CAZ, or a Class C CAZ with traffic management at Queen Square, could both achieve compliance in 2021. As both options achieve the primary critical success factor of air quality compliance in the shortest possible time, they were taken forward for economic assessment and social distributional assessment.

2.7.3.2 Non-modelled options

The following options were not taken forward for modelling at the OBC stage:

- Medium or Large Class C CAZ
 - Exceedances within the boundary for small zone option meant that expanding the CAZ boundary would have no potential to further improve these locations.
- Class C CAZ with Further Increased Charge
 - Sensitivity testing indicated that, whilst a higher charge could achieve compliance this would be higher than precedence, which raises concerns about treatment of equitable trip purposes and is subject to uncertainty around the response rate of LGVs.
- Non-Charging Measures Only
 - The number and impact of non-charging measures that could be delivered would not achieve compliance within the timescales required.

2.7.3.3 Preferred option

The economic assessment in the OBC determined that the economic costs for both options outweighed the economic benefits by a considerable margin. This is primarily driven by the loss in consumer welfare associated with changing travel patterns and behaviours and the onerous capital and operational costs. The Class C CAZ achieved a marginally smaller negative net present value (NPV) compared to the Class D CAZ and was therefore the preferred option from a monetised cost-benefit perspective. Both options achieve compliance in 2021.

Further, the distributional and equalities impact assessment within the OBC demonstrated that both schemes would generate significant adverse distributional impacts for businesses within Bath. However, a Class C CAZ has a largely reduced impact on other socio-economic groups compared to a Class D CAZ.

Both schemes were also assessed against the secondary CSFs listed in Section 2.5; see Table 2-5 for an overview. A Class C CAZ was found to be marginally more successful overall at meeting the secondary CSFs, particularly in relation to public and political acceptability.

Table 2-5: Assessment of each option against the secondary CSFs

| Secondary CSFs | Assessment of each Option against the Secondary CSFs | |
|--|--|-------------|
| | Class C CAZ with Traffic Management | Class D CAZ |
| Strategic | | |
| All trip purposes treated equitably. | ✓✓ | ✓✓ |
| Compliance with Defra CAZ framework, including minimum requirements. | ✓✓ | ✓✓ |
| Economic | | |
| Mitigate financial impact on low income groups. | ✓✓ | ✓ |
| Maximise health improvements of low income groups. | ✓ | ✓✓ |
| Net economic benefit. | - | - |
| Improve general public health. | ✓✓ | ✓✓ |
| Commercial | | |
| Is the market able to supply in the time available? | ✓✓ | ✓✓ |
| Financial | | |
| Likelihood of revenue equating to implementation/operational costs. | ✓ | ✓✓ |
| Upfront capital required for scheme. | ✓ | ✓ |
| Risk of financial penalty to B&NES. | ✓ | ✓ |
| Management | | |
| Public acceptability | ✓✓ | ✓ |
| Local, regional and national political acceptability. | ✓✓ | ✓ |
| | Feasible – preferred option | Feasible |

The CAZ C scheme with traffic management measures was selected as the preferred option in the OBC with the boundary presented in Figure 2-12 below. Refer to FBC-08 'Options Assessment Report' in Appendix C of this FBC for further details.

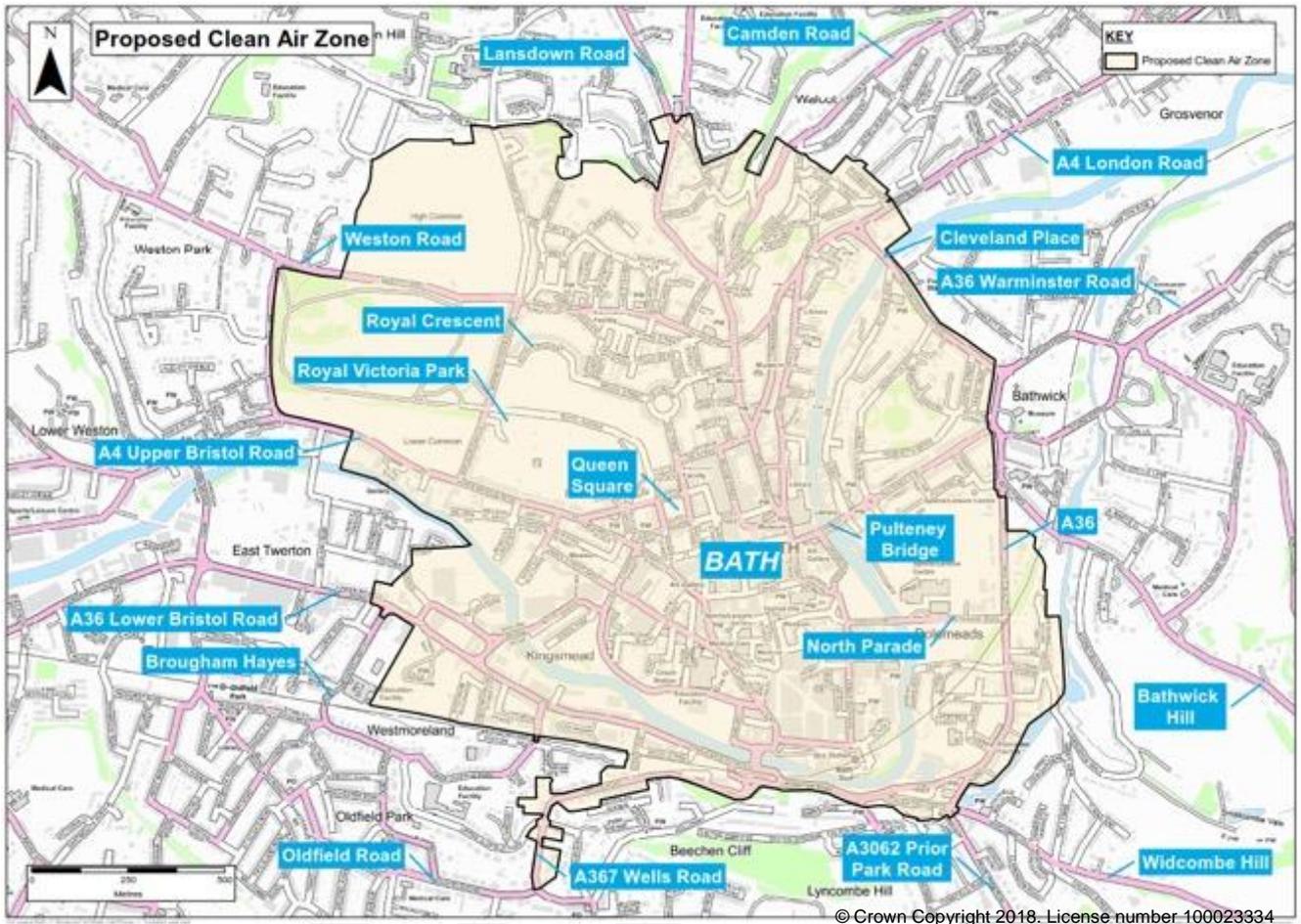


Figure 2-12: Revised Boundary in OBC

2.7.3.4 Supporting measures

All modelling assessments undertaken included only the impact of the CAZ charging scheme and bus retrofitting and, for a Class C CAZ, traffic management at Queen Square. The other non-charging measures set out within the shortlisted packages in the SOC were re-considered and refined in a separate assessment process focused on alleviating any adverse impacts of the charging scheme. These schemes are not intended to provide significant additional air quality improvements, nor any significant alterations to traffic flows, and hence are not included within the modelling assessment.

A longlist of non-charging measures was created during the SOC stage of the project. The longlist considers a broad range of options to both improve air quality and mitigate the negative impacts the CAP may have on certain groups. A number of measures were added to this list during the evolution of the project since the SOC, and the criteria against which the measures should be assessed was altered due to additional guidance from JAQU which set out the criteria that proposed mitigation measures must meet. Therefore, the revised longlist has been evaluated against a set of revised feasibility criteria, to establish which measures should be included in this project.

The consideration of non-charging measures and process for assessing the long list of non-charging options is shown in Figure 2-13 and described in more detail in FBC-08 'Options Assessment Report' in Appendix C of this FBC.

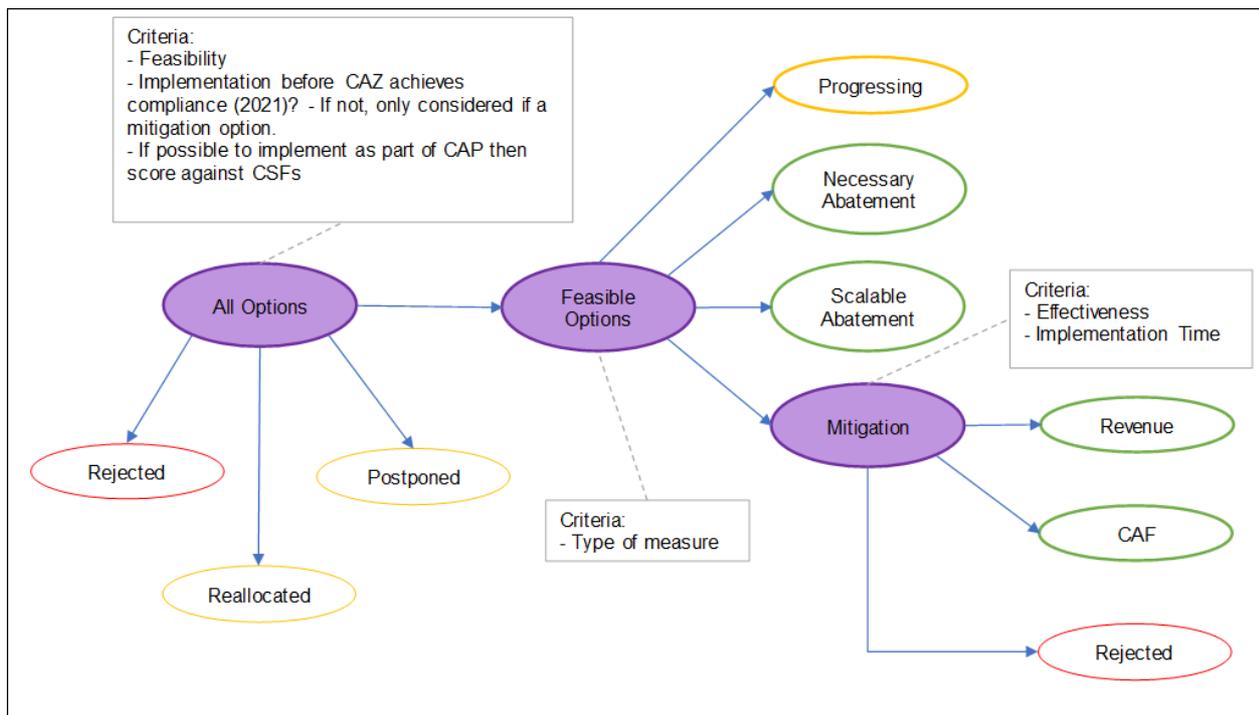


Figure 2-13: Non-charging measures shortlisting process

The non-charging measures were proposed either as abatement to support scheme compliance or as mitigation for the potential negative impacts of the charging scheme. Table 2-6 **Error! Reference source not found.** p presents the OBC shortlist of non-charging options for the Class D CAZ and Class C CAZ with traffic management schemes.

With the exception of the Queen Square Traffic Management required for the Class C CAZ scheme only, the shortlists of options were the same for both options, however separated differently depending on the groups of people targeted by the measure. It was recognised at the OBC stage that, whilst cars would not be charged under a Class C CAZ, it would be beneficial to retain some of the measures targeted towards car drivers as this could also bring additional air quality improvements and wider local benefits.

Table 2-6: Summary of non-charging measures included in the OBC

| Class C CAZ with traffic management | Class D CAZ |
|--|--|
| <p>Abatement Schemes - currently progressing</p> <p>Reduced residents' parking permit cost for low emission vehicles (Early Measures Fund)</p> <p>Converting the experimental TRO for the bus lane on London Road at Lambridge to a permanent TRO</p> <p>Promote low emission vehicles for Hackney carriages/private hire through licensing</p> | <p>Abatement Schemes - currently progressing</p> <p>Reduced residents' parking permit cost for low emission vehicles (Early Measures Fund)</p> <p>Converting the experimental TRO for the bus lane on London Road at Lambridge to a permanent TRO</p> <p>Promote low emission vehicles for Hackney carriages/private hire through licensing</p> |
| <p>Abatement (necessary) – Implementation Fund</p> <p>Retrofit funding for registered, local Euro 4/5 buses.</p> <p>Anti-idling enforcement/publicity of impacts; school zig zag enforcement.</p> <p>Weight restriction enforcement</p> | <p>Abatement (necessary) – Implementation Fund</p> <p>Retrofit funding for registered, local Euro 4/5 buses.</p> <p>Anti-idling enforcement/publicity of impacts; school zig zag enforcement.</p> <p>Weight restriction enforcement</p> |

| | |
|--|--|
| <p>Queen Square Traffic Management</p> <p>Abatement (scalable) – Implementation Fund</p> <p>Provide additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking</p> <p>Options to improve cycling and walking experience, aimed at encouraging modal shift.</p> <p>Expand proposal (included in Go Ultra Low package) to increase the public electric car charging network and develop an on-street charging policy</p> <p>Provide 24 hr secure parking at all three P&R sites to encourage overnight use and facilitate extended operating hours</p> <p> Scoot/cycle to school initiative</p> <p>Financial support (grants) for replacing pre-Euro 4 cars with compliant ones, including a Mobility as a Service pilot</p> <p>Free park and ride concession</p> <p>Bus priority measures at traffic signals</p> <p>Mitigation Schemes - Clean Air Fund</p> <p>Financial support (interest-free loans) for pre-Euro 6 diesel commercial vehicles, including loans for electric charging points on private land</p> <p>Delivery and servicing plans for businesses</p> <p>Mitigation Schemes - Revenue from CAZ charges</p> <p>Provide additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking</p> <p>Options to improve cycling and walking experience, aimed at encouraging modal shift.</p> <p>Expand proposal (included in Go Ultra Low package) to introduce electric cycle hire to the city</p> <p>Expand proposal (included in Go Ultra Low package) to increase the public electric car charging network</p> <p>Increased utilisation of car/van club network in Bath.</p> <p>Implement public transport route improvements both on key corridors in/out of the city and within the CAZ</p> <p>Expand size of existing P&R sites. Provide additional P&R capacity at the university sites at weekends and during holiday periods.</p> <p>Retrofit funding for registered, local Euro 4/5 HGVs, once the technology becomes available</p> <p>Smaller P&R sites on existing bus routes.</p> <p>Credits for use in Mobility as a Service Scheme</p> | <p>Mitigation Schemes - Clean Air Fund</p> <p>Provide additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking</p> <p>Options to improve cycling and walking experience, aimed at encouraging modal shift.</p> <p>Expand proposal (included in Go Ultra Low package) to increase the public electric car charging network and develop an on-street charging policy</p> <p>Provide 24hr secure parking at all three P&R sites to encourage overnight use and facilitate extended operating hours</p> <p> Scoot/cycle to school initiative</p> <p>Financial support (grants) for replacing pre-Euro 4 cars with compliant ones, including a Mobility as a Service pilot</p> <p>Financial support (interest-free loans) for pre-Euro 6 diesel commercial vehicles, including loans for electric charging points on private land</p> <p>Free park and ride targeted at low-income households and families.</p> <p>Delivery and servicing plans for businesses</p> <p>Bus priority measures at traffic signals</p> <p>Mitigation Schemes - Revenue from CAZ charges</p> <p>Provide additional cycle parking across the city centre in visible locations and pilot a management scheme to improve proper usage of cycle parking</p> <p>Options to improve cycling and walking experience, aimed at encouraging modal shift.</p> <p>Expand proposal (included in Go Ultra Low package) to introduce electric cycle hire to the city</p> <p>Expand proposal (included in Go Ultra Low package) to increase the public electric car charging network</p> <p>Increased utilisation of car/van club network in Bath.</p> <p>Implement public transport route improvements both on key corridors in/out of the city and within the CAZ</p> <p>Expand size of existing P&R sites. Provide additional P&R capacity at the university sites at weekends and during holiday periods.</p> <p>Retrofit funding for registered, local Euro 4/5 HGVs, once the technology becomes available</p> <p>Smaller P&R sites on existing bus routes.</p> <p>Credits for use in Mobility as a Service Scheme</p> |
|--|--|

2.8 Benefits, Risks, Constraints and Inter-Dependencies

In accordance with the JAQU Inception Package guidance and the HM Treasury Green Book, the SOC and OBC set out the potential benefits, risks, constraints and dependencies associated with this CAP. Based on more detailed understanding of the baseline issues and intervention proposed, these considerations are reassessed below, with a view to informing the selection of measures that will maximise benefits and mitigate risks.

2.8.1 Benefits

The CAP could provide a wide range of quantifiable and non-quantifiable benefits across the following areas:

- Public health and the environment.
- Transport (reduced vehicle emissions, movements, journey times, accident rates).
- Financial revenue streams to re-invest in local transport.

The types of impacts are introduced below. A detailed assessment of the project options' economic impact is presented in the Economic Case, Section 3.

2.8.1.1 Public Health and the Environment

The public health issues associated with poor air quality are established in Section 2.2. In light of the causal link between poor air quality and poor public health, health experts believe that improvements in air quality can lead to a range of public health benefits, including:

- Reduced morbidity, leading to a reduction in public health expenditure (associated with hospital admissions and health care) and increased productivity through reduced work absenteeism.
- Reduced mortality, leading to a reduction in lost output and human costs.

In addition, an improvement in air quality can also lead to positive externalities associated with the natural and built environment, including:

- Reduced impact on ecosystems (nature conservation and green spaces in B&NES) through a reduction in emissions of NO_x.
- Reduced impact on climate change through a reduction in NO_x.
- Reduced damage to townscape and the built environment (particularly relevant in Bath given the city's United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Site status), leading to a reduction in surface cleaning costs and amenity costs for residential, historical and cultural assets.

2.8.1.2 Transport

As suggested in Section 2.3.1 and validated in Section 2.4.1 and 2.4.2, road transport is the primary source of poor air quality in Bath. Hence the CAP will attempt to tackle this source, by reducing vehicle emissions through behavioural change and fleet change. It is possible that the behavioural and fleet change induced by the CAP could lead to a number of positive externalities, including:

- A small temporary reduction in vehicle movements through the centre of Bath, leading to:
 - Improvements in journey times and reliability for private and public vehicles;
 - A reduction in road traffic collisions and accident rates;
 - An improvement in noise pollution; and
 - A reduction in congestion, leading to a reduction in operating costs.
- Mode shift to sustainable and active modes, in particular walking and cycling leading to additional public health benefits related to reduced risk of premature death and reduced work absenteeism (NB: these public health impacts are additional to those associated directly with air quality improvements discussed above).

2.8.1.3 Financial Revenue Streams

Defra's Clean Air Zone Framework (May 2017) prevents Local Authorities from setting a charge as a revenue raising measure, but any charging scheme will need to be set at a level to produce a change in behaviour. Therefore, there is potential for charging schemes to generate revenue in excess of the operational costs of the scheme. In accordance with the Transport Act 2000 any net revenue should be re-invested to facilitate the achievement of local transport policies which aim to improve air quality and support the delivery of the ambitions of the Plan. As the shortlisted options identified at SOC stage and identified in Section 2.7 all contain a charging element, there may be potential for excess revenue generation that can be used to support transport policy. The likelihood and extent of a revenue surplus being generation is considered in more detail in the Financial Case, Section 5.

2.8.2 Risks

The CAP has the following risks associated with it, which are described in more detail in the following sections:

- Changes in carbon emissions;
- Changes in pm emissions;
- Economic impacts;
- Resource demand;
- Impacts on the vulnerable, particularly low-income groups;
- Impact on public transport services; and
- Social acceptance.

2.8.2.1 Carbon

The CAP is focused on one pollutant; NO₂. However, in an attempt to reduce NO₂ emissions, the CAP could inadvertently alter other pollutant emissions, such as Carbon Dioxide (CO₂). Change in CO₂ emissions at the same time as a reduction in NO₂ could be brought about by the transition from diesel vehicles (which produce high levels of NO₂) to petrol vehicles (which produce less NO₂ but more CO₂) or from adjustments to the number of trips made.

In addition, the creation of a charging zone or access restrictions, may result in some vehicles re-routing around the zone. This could increase fuel consumption and subsequently carbon emissions. The detailed assessment of the change in carbon emissions is presented in the Economic Case of this FBC.

2.8.2.2 Particulate Matter

Recent monitoring data has demonstrated that PM emissions in Bath have been under legal limits for several years. It is not anticipated that the CAP will produce an increase in PM emissions since choices which reduce NO₂ from vehicles are also likely to reduce vehicle-related PM.

2.8.2.3 Economic Impacts

The CAP has the potential to impact the local economy depending on the measures selected. A significant proportion of jobs in Bath are located within the city centre where some of the most significant exceedances are located. In other words, where the CAP will seek to impose most clean air measures. Measures that penalise travel into central Bath could limit the attractiveness of jobs within the city centre, putting employment opportunities, business viability and investment at risk. Further, the buoyant tourism industry in Bath, attracting 4.8 million day-visitors per year to the city as well as £411 million in tourist expenditure²², could also be at risk

²² B&NES, <http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/wiki/tourism-and-visitor-economy>

from any measures that deter travelling to the city centre. It is therefore desirable to select an option which has the least impact on the local economy, and if possible a neutral or positive impact.

Funding is available from central Government for non-charging measures to mitigate this impact should it materialise. Longer term benefits from a transition to a greener economy could include an increased attractiveness to businesses and tourism.

2.8.2.4 Resource Demand

This CAP is one of 15 similar CAPs being developed across the country within the same time frame. There are 28 local authorities involved, but some are grouped together to deliver a joint CAP. The objectives of all these CAPs is to achieve compliance with the NO₂ Limit Values. It is therefore likely that similar measures could be proposed in multiple locations, putting pressure on the market supply of particular items, such as ANPR cameras, compliant vehicles or retrofitting technology suppliers.

Similar resource availability risk could apply at local authority level. B&NES would need to ensure that there are economic and human resources available to fund and run the implementation of the CAZ and the posterior management, monitoring and enforcement of the required initiatives. The preferred option should seek to achieve a balance between these risks and the desired health improvements.

2.8.2.5 Vulnerable Groups

It is appropriate to consider the differential impacts of the CAP on low income households and businesses, in order to identify potential mitigation strategies that could be supported through the CAF. In particular, there is potential to disproportionately penalise vulnerable groups in society, depending on the geographic location, scale and the structure of vehicle compliance standards, through implementation of a charging scheme.

2.8.2.6 Impact on Public Transport Services

A significant proportion of the bus fleet in B&NES consists of older diesel vehicles that require upgrading, replacement or retrofitting to ensure vehicular, and overall scheme, compliance. In the absence of financial support to facilitate the required replacement or retrofitting, an increase in operational costs to bus service providers could be passed on to bus users, leading to adverse affordability affects for this group, and it may not be viable to continue operation of some local bus services which are vital in linking more rural locations with Bath. In addition, the ability to achieve compliance in the shortest possible time is likely to be affected if bus operators choose to pay the charge rather than replace or retrofit vehicles.

Funding is available from Central Government to mitigate this impact and support the compliance of the local bus fleet.

2.8.2.7 Social Acceptance

Public acceptance and understanding of the CAP are important to ensure successful implementation and operation. In an attempt to secure recognition and support from stakeholders and the public, the stakeholder engagement process and communications plan is underpinned by the promotion of the health and environmental benefits of the CAP.

2.8.3 Constraints

The following sections detail the constraints on the CAP including:

- Legal requirements to achieve compliance with the Limit Values in the shortest possible time
- Implementing the required local charging order in order to operate charging measures such as a CAZ
- Engineering and implementation of scheme infrastructure that enables compliance in the shortest possible time and;

- The level of resource required to operate a charging scheme.

2.8.3.1 Legal

The most significant constraint on the CAP is the legal situation through which it has materialised. Specifically, the requirement for the UK Government to achieve compliance with the Limit Values in the shortest time possible, and only considering cost when comparing between two equally quick schemes (Sections 1.1 and 2.2.3).

2.8.3.2 Planning/Consenting

A local charging order is required to allow the development and operation of charging measures such as a CAZ. The primary factor for approval of a charging order is whether the local traffic authority is satisfied that the local charging scheme appears desirable, for the purpose of, directly or indirectly facilitating the achievement of local transport plan policies, of both the local traffic authority/charging authority and any combined authority within whose area the proposed order will take effect. Other factors that need to be satisfied prior to bringing a local charging order into effect include:

- An adequate consultation process; failure to consult to the required standard could be seen to be legally challengeable.
- Public Sector Equality Duty and possible Human Rights Act issues which will need to be carefully and demonstrably considered.

2.8.3.3 Engineering

The most significant engineering constraint affecting attempts to improve air quality in Bath is the requirement to achieve legal compliance with air quality standards, in the shortest possible timescales. In light of the extensive design and development work required to realise large-scale projects such as the implementation of new highways, these projects are unlikely to be deliverable in the timeframe required, to achieve air quality compliance in the shortest possible timescales. This timescale factor limits the range of options available within the CAP.

2.8.3.4 Resources

The CAP will require significant recruitment to manage and operate any back-office and enforcement functions required to ensure successful delivery. The scale and form of staff resources required to deliver the CAP will vary depending on the management and operation processes selected (see Sections 4 and 5 for more details). In the event that back office and enforcement functions are retained in-house, B&NES could be required to recruit a large number of temporary and flexible staff, particularly to deal with contraventions. B&NES could struggle to fill the specific roles created as a result of the CAP. At the same time, existing functions such as Human Resources, Property and IT may be exposed to considerable pressure to ensure that the recruitment process is adequately resourced.

2.8.4 Dependencies

The delivery and success of the CAP is linked to a range of national, sub-regional and local stakeholders and statutory bodies, whose activities, programmes and policies could have significant implications on the transport and air quality context in B&NES. Further, various agencies hold a range of transport data (for example compliance, registration, taxi licensing, fleet databases) and air quality data (for example PCM/AQMA receptor information) that will be critical to ensuring the ongoing operation and monitoring of the CAP's intervention measures. Therefore, close collaboration across various partners is essential to ensuring timely progress of the CAP.

2.8.4.1 Highways England

Concerning national stakeholders, Highways England currently manage and operate the A46 and A36 which enter/exit Bath on the eastern side of the city. B&NES manage the route through the city between the A4/A46 and A36, but this section of the network forms a key link within the Highways England Strategic Road Network (SRN).

There are key exceedances of the NO₂ Limit Value on London Road, which forms part of this route through Bath. As such, the involvement of Highways England is required to implement the final CAP.

2.8.4.2 Low Emissions Vehicles

The CAP is also dependent on the ongoing nationwide roll-out and promotion of LEV uptake, by both the private and public sector. The opportunity for individuals to switch to new and used compliant vehicles is related to the availability of vehicles in the market, the provision of the appropriate infrastructure and facilities to support these type of vehicles, and promotional programmes and incentives to buy LEV.

2.8.4.3 West of England Combined Authority

At a sub-regional and local level, the CAP is dependent on the progression of B&NES and the West of England Combined Authority's (WECA) existing and proposed intervention programmes. A range of public transport initiatives, parking schemes and public realm/movement strategies may contribute to an improvement in air quality in advance of, or alongside, the CAP. Therefore, these programmes could have some influence over the CAP's ability to meet the required timescales or affect the overall outcome. The wider WECA and B&NES programmes typically have longer timescales for delivery and implementation, meaning that the overlap between the CAP and wider initiatives could be limited. However, this will need to be considered in the CAP.

Further, collaboration with WECA will be critical where the CAP is expected to interact with the (as yet not identified) Key Route Network. As such, discussions with WECA are ongoing to understand the interactions between the CAP and existing and future programmes undertaken by WECA.

2.8.4.4 Neighbouring Authorities

Neighbouring authorities including Wiltshire, Bristol, South Gloucestershire, Somerset and, further afield, South Wales, are also closely related to development of the CAP, in light of travel to work patterns for employees working in B&NES. Census 2011 data demonstrates that more than one-third of all employees in B&NES are sourced from these nearby authorities (c. 25,000 No.), of which, 82% commute via car or van (c. 20,000 No.). Commuting patterns from these source areas, along with the attractiveness of B&NES as a place to work, could be impacted or be fundamentally altered by the scheme.

Furthermore, transport and air quality conditions in Wiltshire are contingent on the CAP, not least because any measures targeted at reducing exceedances on London Road could directly impact on Wiltshire. For example, if any proposed measures make the highway routes through Bath less attractive, it is possible that traffic will find alternative routes through Wiltshire. The CAZ proposals are likely to be less punitive towards Heavy Goods Vehicle (HGVs) than previous measures proposed (for example HGV charging rather than prohibition of HGV movements in the city) and the CAP will be underpinned by legal requirements which differentiates it from previous circumstances. In addition, any accelerated improvement in fleet composition in Bath is likely to have positive spill over impacts on neighbouring local authorities such as Wiltshire. This could lead to more low-polluting vehicles at an earlier point in time in Wiltshire as well as Bath, resulting in positive air quality impacts across a wider area than Bath alone.

Bristol City Council have been directed to implement a CAP as part of the UK Air Quality CAP alongside B&NES. Therefore, there are some interdependencies and synergies between the two local authorities that may allow for joint market testing and procurement. Furthermore, the implementation of two CAP's in close proximity may reduce the potential for displacement of traffic and economic activity from one affected area to another, as both local authorities are subject to similar measures.

Other local authorities with economic and geographic ties are also embarking on the delivery of CAPs. South Gloucestershire were issued a Ministerial Direction by the Government to undertake a Targeted Feasibility Study to identify any measures that would achieve compliance with the relevant statutory NO₂ Limit Values in the shortest possible time. In South Gloucestershire, the PCM national model anticipates exceedances of the EU Limit Value to occur until 2019 alongside the A4174 between the M32 and A4017, with compliance predicted to be achieved in 2020. Further afield, Cardiff has also identified the need to improve air quality through changes in transport and travel behaviour, as part of their Transport and Clean Air Green Paper. Whilst the timeframes

associated with developing a CAP in Cardiff are likely to lag behind the Bath CAP, there is residual potential for interdependencies and synergies, as well as 'lessons learned', to be shared between the areas.

Discussion between B&NES and neighbouring authorities are ongoing to better understand the interactions between the CAP and existing and future programmes undertaken by proximate authorities.

2.9 Stakeholder Engagement

Engagement with the public and stakeholders is an important part of developing the CAP for Bath. The Council has made a commitment to communicate and engage with both the public and stakeholders throughout the various stages of development of the CAP and throughout implementation of the measures required to reduce emissions. This process began in February 2018 and is ongoing; Figure 2-14 presents a summary of the key stages.

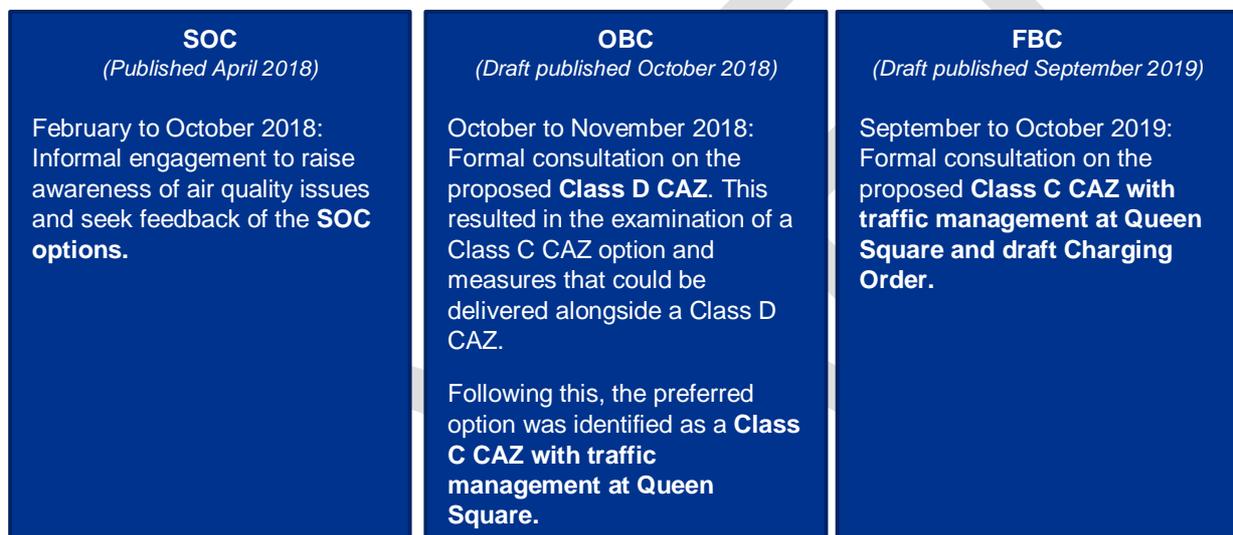


Figure 2-14: Key stages of stakeholder engagement

See FBC-07 'Stakeholder Management and Engagement Plan' in Appendix B of this FBC for further detail.

2.9.1 Period of informal Engagement February to October 2018

This first phase of engagement, undertaken between February and October 2018 was not a formal consultation. The aim was to engage as many people as possible in an ongoing conversation on air quality issues during the early stages of development of the Clean Air Plan. The style of engagement undertaken reflected this and, during this period, various information was published, a range of events and activities were held, and comments were continually invited. Whilst some of the engagement activities focused on specific audiences or issues, other activities were designed to more generally raise the profile of the air quality problem and the work being undertaken by the Council to address this.

Between February and June 2018, a total of thirty-seven engagement events were held and engagement continued until October. The scale and method of engagement events has varied in order to ensure as wide an audience as practically possible was reached. Types of engagement initiatives undertaken included:

- Eleven public engagement events, comprising eight drop-in sessions and three public surgeries, combining a mixture of formal and more structured formats;
- Engagement/communication with around two hundred organisations, including direct correspondence and attendance at engagement events, including twenty-six specifically for organisations in the area.

- As part of this process, key groups that were engaged with included government bodies (e.g. Public Health England, Highways England), local authorities, businesses (represented by bodies such as the Federation of Small Businesses), residents associations, transport operators, media outlets and campaign groups.
- The engagement methods utilised for discussion with these groups included briefings, workshops and face-to-face meetings.
- Additional engagement methods to induce feedback, including:
 - Online questionnaire – available at project web pages
 - Paper questionnaire – available at engagement events
 - Email correspondence – via a specific email account linked to the project website
 - Telephone conversations – direct with B&NES officers
 - Social Media – collation of comments on Facebook and Twitter.

The aim of the engagement process was to provide the public, and all interested parties and organisations, active in B&NES with an opportunity to express their views and share opinions. The two main objectives of the engagement activity were to:

- Have ongoing dialogue with stakeholders, residents and the wider community to:
 - Raise the profile of the air quality problem in Bath;
 - Generate an understanding of the associated health impacts and the proposed measures to improve air quality; and
 - The possible implications for travel choices.
- To seek feedback at a key stage (SOC stage) of the CAP and, where possible, utilise this in the technical assessment of the shortlisted CAZ options²³.

A detailed summary of responses received during this engagement period is provided in FBC-24 'SOC Engagement Summary Report' in Appendix O of this FBC. However, an overview of the common themes emerging from the feedback is provided below. These are intended to provide an overview of the nature of the feedback received and highlight information which will be relevant to the Council in taking forward proposals for the CAZ:

- There was a general and widespread recognition of the need to improve air quality in Bath. The quantitative analysis of the feedback form responses showed: 89% of respondents were aware that air pollution is a problem in Bath; 83% of respondents were concerned about air pollution in Bath; and 70% of respondents supported a charging zone in principle. The qualitative feedback also suggested that many respondents supported the principle of a CAZ and could identify a wide range of likely benefits.
- The qualitative analysis showed that relatively few respondents indicated a preference for a particular CAZ option, instead their comments focused on raising questions and identifying potential areas of concern. This reflects the early stage of engagement, and the fact that no specific scheme was put forward for comment. However, it is important to note that some respondents did not feel a CAZ was necessary, whereas others felt a CAZ did not go far enough.
- The feedback suggested some misunderstanding of where air quality improvements would be seen after CAZ implementation, highlighting the need to better explain that the positive impacts of a CAZ are not just felt within it.
- There was some concern among respondents regarding the possible impacts of a CAZ to the more vulnerable groups of society including: low income households, the elderly, and local tradesmen and businesses. A variety of methods were suggested to mitigate these impacts.

²³ B&NES, <http://www.bathnes.gov.uk/bath-breathes-2021>

- Potential difficulties initiating and maintaining long-term behaviour change was noted by some respondents to be a concern. This was mainly in relation to reducing air pollution and the effective operation of a CAZ. Respondents suggested incentive provision and inclusion of more “carrots” to support the necessary behaviour changes.
- Many respondents requested public transport improvements and the need to provide better and more attractive alternatives to car travel in Bath. This is supported by the quantitative feedback showing that the other measure to “*Implement public transport route improvements*” was supported by 75% of respondents. The feedback showed that respondents would like air quality improvements to happen alongside congestion reduction measures and traffic flow improvements.
- Parking charges were a common concern among respondents, with some concerned about the impact to local business of increased parking charges (which were revised in August 2018), alongside the implementation of a CAZ. There were requests for a more holistic approach to these policy areas.
- The feedback demonstrated that design details are an area of interest to many respondents, with several requests for further information about the charging system and financial processes of the CAP.
- The CAZ boundary was an area of concern for respondents, who suggested numerous changes/alterations. This was coupled with concerns over the diversionary impacts of the CAZ boundary and the potential associated air quality and congestion impacts for areas outside of the zone.
- Detailed and specific technical queries were received from some respondents, with some questioning the validity of the technical assessment of options and others seeking to better understand these processes.
- There were also many comments recommending improvements to existing infrastructure and highlighting areas where infrastructure improvements are required. These suggestions cannot be delivered within the Project timescales or extend beyond the scope of the project.
- Respondents were generally positive about the engagement process to date. Some suggested amendments to the engagement materials and event format to be considered in the upcoming engagement work.

2.9.2 Formal Consultation October and November 2018

Between 16 October and 26 November 2018 B&NES undertook formal consultation on a proposal to implement a Class D charging CAZ.

This consultation was undertaken in the context of a number of fixed constraints governing the actions of the Council, what is negotiable and the ability to act on feedback. The constraints included:

- 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 they do not put into place a package of measures to address air quality within this time frame.
- Technical work undertaken prior to the start of the consultation process showed that a charging CAZ is the only mechanism capable of reducing emissions to appropriate levels within the required timescale. Based on this evidence, a Class D CAZ was identified as the option most likely to achieve compliance.
- 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.
- Funding for a CAZ is dependent upon the Government’s JAQU approving the FBC. There are also strict rules on how the funding available can be spent.
- The final decision on the type of charging zone and the detail of this will be made by elected Cabinet members, taking account of feedback from JAQU.

In this context, the aim of the consultation process was to provide an opportunity for discussion between the Council and any persons concerned about the proposals or their impacts. It also provided a forum for the sharing

of information and ideas on how any issues could potentially be resolved. In particular, it focussed on seeking comments on how the proposed Scheme could be refined, in order to:

- Improve its effectiveness in tackling air quality issues;
- Help to mitigate any potential impacts either on specific groups or locations; and
- Better support the community and road users to adapt and adjust.

During the consultation period feedback was received from 8462 respondents and approximately 800 people attended a consultation event. The consultation attracted responses from a wide range of groups and organisations including Wiltshire Council, FoBRA, Town and Parish councils, Client Earth, Bath Preservation Trust, Bath Business Improvement District, Bath Chamber of Commerce and Age UK. Additionally, many businesses responded to the consultation including the RUH, Royal Mail, the RAC, the Freight Transport Association, Bath Spa University, transport operators, sole traders, independent retailers and a number of local schools and churches.

The feedback from the formal consultation is reported in the document FBC-25b 'OBC Report on Formal Consultation' in Appendix Q of this FBC. Feedback was varied and detailed. However, overall respondents showed an understanding of the need to address air quality in Bath. A wide range of comments were submitted by individuals, groups and businesses on many aspects of the proposed CAZ. In particular comments focused on the proposed boundary, who and what vehicles should be charged, potential economic impacts and the support that would be needed to drive behaviour change. Whilst some respondents did not support a charging zone many focused their feedback on identifying ways in which the proposed Class D CAZ proposal could be evolved to maximise its impact and reduce any unintended consequences. The main themes from the feedback are summarised as follows:

- Individuals, including residents and commuters wanted to see more support to help them comply with a Class D CAZ. Many suggestions were made including adjusting the operating hours of the CAZ, providing discounts or adjusting the charging structures through concessions and exemptions and altering the minimum emission standards.
- Businesses also highlighted a need for more support. This was particularly important for smaller businesses including sole traders and independent retailers, many of whom were concerned about the economic impacts to their business operations as a result of a CAZ. These concerns were extended to their customers, suppliers and employees.
- Opinions on the proposed zone boundary were mixed. Some respondents felt there should be no zone at all or wanted the zone to be smaller whilst others thought the zone should be larger. Requests ranged from a zone using the river as a boundary, to exclusion of through routes, specific streets and residential areas. Others felt the zone should be extended further to cover residential areas. There were also a number of specific inclusion requests covering areas from individual streets to neighbourhoods and even a city-wide boundary.
- Many respondents were concerned about the timescales of the proposed Scheme. Both individuals and businesses felt that a longer time was needed to minimise the economic impacts associated with changing vehicles and behaviour.
- Overall there was a call for public transport improvements to support behaviour change, ranging from reduced fares, extended bus services and operating hours and improved park and ride facilities across B&NES.
- There were concerns about the displacement impacts of a CAZ. These included concerns that traffic, congestion and rat running would increase in areas adjacent to the proposed zone boundary and that parking in residential areas would be used by those looking to avoid driving into the proposed Zone. Additionally, there were concerns that non-compliant vehicles would re-route and that this would worsen air quality and increase traffic and congestion in areas outside of the zone, both in neighbouring areas and in towns/locations further afield including Wiltshire.
- There were a number of suggestions for alternatives to the proposed Scheme, these included: a Class C CAZ, congestion charge, construction of a link road/bypass and charging of all diesel vehicles.

Following the analysis of consultation feedback additional technical work was undertaken to address the main comments raised. This included work to examine additional Class C CAZ options and further consideration of measures that could be delivered alongside a Class D CAZ to reinforce the effectiveness of the zone and support residents and businesses to adapt. This work is reported in FBC-25b 'OBC Consultation Response Report' in Appendix Q of this FBC.

2.9.3 Formal Consultation September and October 2019

A second formal consultation was held for four weeks between 23rd September and 20th October 2019. The aim of this 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 and meetings with key stakeholders 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. 65 letters and emails were also submitted direct to the Council.

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. 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, some 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 and 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.

- 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 businesses. 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.
- 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.
- 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 & 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 & ride sites.
- 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 & Ride to the east of the city.

For further details see FBC-25c 'FBC Consultation Report' in Appendix Q of this FBC.

2.9.4 Post FBC Engagement

The remaining phases of engagement are:

- **Implementation** – At this stage, engagement with stakeholders and the public will split into two workstreams:
 - Engagement associated with installing the charging infrastructure, led by the community liaison team.
 - Engagement on the supporting measures, led by the travel advice team.
- **Operation** – continued conversations with interested parties, led by the travel advice team.

During this stage of the process the opportunity for the public and stakeholders to influence the process will be more limited. The focus of the engagement will be on:

- Continuing to raise awareness of the CAZ option taken forward and inviting comment on any changes to the Scheme since the previous consultation at draft OBC stage;
- Continuing to raise awareness of the wider air quality issue and the need for action;
- Helping people to get compliant in cost-effective ways, find alternative ways to travel around Bath, change their transport and travel habits and understand the important role that everyone can play in tackling air pollution;
- Preparing and supporting people for the implementation of the zone; and
- Ensuring that the statutory processes related to the advertising of Orders (and the associated ability for people to comment on these) are adhered to.

For more detail on the engagement plans for the next phases of the project see FBC-07 'Stakeholder Management and Engagement Plan' in Appendix B of this FBC.

2.10 Logic Map

The logic map presented in Table 2-7 highlights the theory of change underpinning the CAP. It demonstrates how inputs (in the form of programme expenditure) generate outputs (in the form of activities and scheme elements delivered) which drive outcomes (in the form of behavioural, transport and economic changes) leading to impacts (long-term societal changes).

Table 2-7: Logic Map

| Inputs | Outputs | Outcomes | Impacts |
|---------------------|---|---|---|
| Implementation Fund | Class C CAZ established (geography and price structure by vehicle category) | Behavioural change leading to: Accelerated vehicle upgrading Switch in preference for vehicles by fuel type | Improved air quality |
| Clean Air Fund | Infrastructure to monitor and enforce the CAZ | Reduction in non-compliant vehicle fleet Increased mode share of public transport | |
| Other local funding | Additional measures to assist in achieving compliance with Limit Values and AQOs including retrofit and upgrade of local buses and implementation of traffic management | Increased mode share of active travel modes Diverted trips and trips avoiding zone Cancelled trips Businesses choosing to redeploy fleets Changed perception of low emission travel | Increased physical activity Improved human health |
| Local Plan | Additional measures to mitigate the impact of the CAZ on vulnerable groups, including travel advisors to provide guidance to non-compliant vehicle users | Implications of behavioural change: Cost of compliance Reduction in local NO ₂ concentrations Potential increase in CO ₂ concentrations | Loss of some economic activity Bath is a cleaner more attractive place to live, work and visit |
| Equality Duty | Community and business engagement | Changes to use of highway network across B&NES Changes to the location of economic activity 'Neutralised' negative impacts on Small and Medium-sized Enterprises (SMEs) / micro businesses and disadvantaged groups | |

3. Economic Case

3.1 Introduction

Building on the OBC, Section 3, the Economic Case for the FBC considers all of the relevant costs and benefits arising from the Bath CAP in light of the changes to the preferred option identified by the final OBC.

The changes are summarised as:

- An extended boundary shown in Section 3.2.1;
- A revised package of mitigation measures; and
- The scalable abatement measures proposed at OBC (i.e. those supporting measures which are not required for compliance but would improve the likelihood of compliance), which are no longer under consideration.

The following sections are re-visited in light of the changes:

- Economic assessment of the preferred option that is demonstrably aligned with the CSFs; and
- Distributional analysis of the preferred option to identify any differential impacts across socio-economic groups.

For completeness, much of the background to the options assessment process within the OBC has been retained in the following sections, with further details on how this is or is not affected by the changes to the preferred option for the FBC.

3.2 Assessment of Charging Measures

3.2.1 Clean Air Zone Boundary

The SOC established that a charging zone would be necessary to achieve compliance. During the development of the OBC a number of changes were made to the small CAZ boundary identified in

Figure 2, for the following reasons:

- To reduce the potential impact of rat-running;
- To provide opportunities for vehicles to turn-around before they enter the CAZ; and
- To rationalise the boundary in order to minimise the impact of additional street clutter (primarily signage and cameras).

Further changes were made following completion of the OBC, primarily for public and political acceptability of the scheme based on feedback from the public consultation.

Full details of these boundary changes are provided in FBC-04 'Technical Note on Boundary Changes' in Appendix A of this FBC. The revised boundary is shown in Figure 3-1.

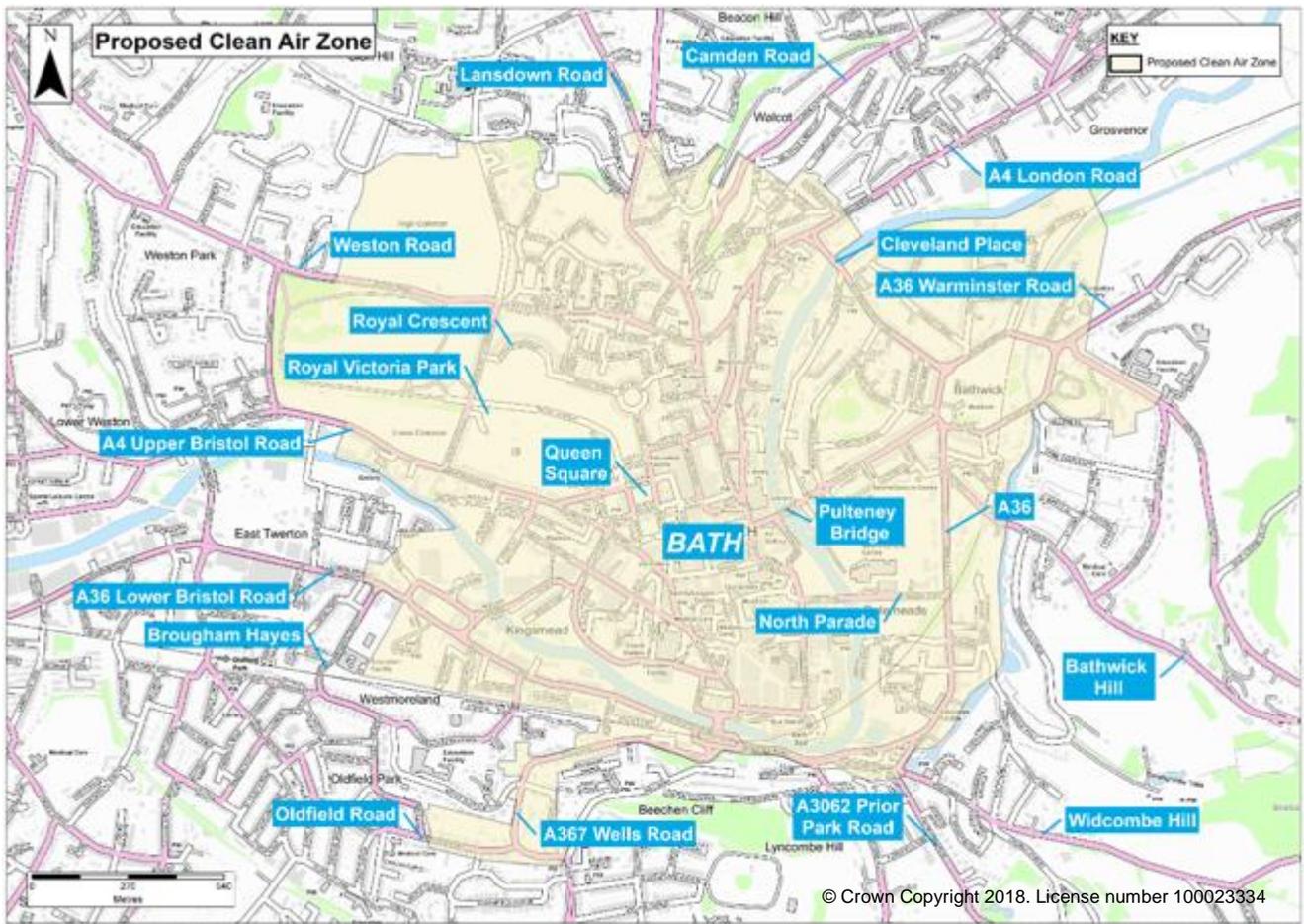


Figure 3-1: Revised Boundary in FBC

3.2.2 Transport Modelling Approach

Section 2.4.1 provided an overview of the transport modelling undertaken to estimate the composition of the vehicle fleet in the base year (2017) and baseline/compliance year (2021). The compliance year was initially calculated using the model runs of each of the options undertaken within the SOC, and an understanding of the time taken to deliver each proposed scheme. This assessment had suggested that the year of compliance could be as early as 2020. However, more detailed modelling undertaken for the OBC indicated the first year of compliance would not be until 2021. Hence the modelled compliance year is 2021. Traffic forecasts were also derived for the future year (2031), to assess the impact of the CAZ ten years after the baseline/compliance year.

The modelled compliance year remains as 2021 for this FBC.

3.2.2.1 Behavioural Responses

The future year traffic forecasts were primarily driven by the behavioural responses anticipated due to CAZ implementation, as inferred from the Stated Preference Survey, described in FBC-30 'Stated Preference Survey Report' in Appendix L of this FBC. The primary responses, listed below, were modelled using the G-BATH highway model using the following methodology, as described in Section 6 of FBC-13 'T3 Methodology Report' in Appendix E of this FBC:

- Pay charge;
- Avoid zone;
- Cancel journey / change mode; and

- Replace vehicle.

The behavioural responses remain the same for the purposes of this FBC.

3.2.2.2 Proposed Charge Rates

A key driver of the behavioural responses was the proposed charge rate for non-compliant vehicles adopted in the analysis. The methodology for determining the proposed charge rates for all vehicle types is discussed fully in FBC-13 'T3 Methodology Report' and Table 3-1 shows the final proposed charges. These are selected as the minimum charges required to address the air quality exceedances within Bath and are expected to bring about compliance with the annual mean Limit Value for NO₂ in the shortest time possible, or 2021, based on the traffic and air quality modelling.

Table 3-1: Bath CAZ proposed charges

| Charge Class | Charge |
|-----------------------------|---------|
| Taxis | £9.00 |
| Light Goods Vehicles (LGV)s | £9.00 |
| HGVs | £100.00 |
| Buses | £100.00 |
| Coaches | £100.00 |

Taking into account these charging rates and the subsequent impact on individuals' behavioural choices, the response rates outlined in Table 3-2 were adopted within the traffic forecast and modelling.

Table 3-2: Final primary behavioural response rates

| Response | Taxis | LGVs | HGVs | Buses | Coaches |
|------------------------------|-------|-------|-------|-------|---------|
| Pay Charge | 4.1% | 18.4% | 13.8% | 0.0% | 20.1% |
| Avoid Zone | 0.0% | 11.7% | 4.4% | 0.0% | 0.0% |
| Cancel Journey / Change Mode | 0.0% | 3.6% | 1.4% | 6.4% | 11.5% |
| Replace Vehicle | 95.9% | 66.3% | 80.4% | 93.6% | 68.4% |

It is highlighted that, in accordance with Table 3-2, all modelled options assumed a fully compliant bus fleet operating scheduled services.

The charges and response rates remain the same for the purposes of this FBC.

3.2.2.3 Links to the Air Quality Model

The link from the transport model to the air quality model is outlined FBC-13 'T3 Methodology Report', Chapter 9. Link-based traffic flows, by compliance from the highway model are fed through to the air quality model in a format compatible with the EFT, after undergoing post-processing of the model outputs. FBC-11 'AQ3 Modelling Report' in Appendix D of this FBC provides details of the air quality modelling.

The approach to air quality modelling remains as presented in the OBC.

3.2.3 Preferred Option in the OBC

The OBC identified that a Class D CAZ, or a Class C CAZ with traffic management at Queen Square, could achieve compliance in 2021. Where both options achieve the primary critical success factor of air quality

compliance in the shortest possible time, they were taken forward for economic assessment and social distributional assessment.

The economic assessment in the OBC determined that the scheme could generate an NPV of between -£83.2 million (CAZ C) and -£84.3 million (CAZ D). Under both intervention routes, the economic costs for the proposed schemes were found to outweigh the economic benefits by a considerable margin. This is primarily driven by the loss in consumer welfare associated with changing travel patterns and behaviours and the onerous capital and operational costs. The CAZ C achieved a marginally smaller negative NPV compared to CAZ D and was therefore the preferred option from a monetised cost-benefit perspective.

Further, the distributional and equalities impact assessment within the OBC demonstrated that both schemes would generate significant adverse distributional impacts for businesses within Bath. However, a Class C CAZ has a largely reduced impact on other socio-economic groups compared to a Class D CAZ.

When considering the other secondary critical success factors presented in Section 2.5, the Class C CAZ was found to be marginally more successful overall, particularly in relation to public and political acceptability as cars are excluded from the charging scheme. Refer to Section 2.7.3.3.

In light of these findings, the Class C CAZ (charging higher emissions buses, coaches, taxis, HGVs and LGVs) with additional traffic management was recommended as the preferred option.

3.2.4 Full Business Case

For the core scheme, the Class C CAZ with traffic management option will be assessed for the boundary changes by the following process:

- Revised traffic and air quality modelling to verify that the scheme achieves the primary CSF of air quality compliance in the shortest possible time;
- Undertake revised cost assessment of the scheme;
- Undertake revised economic analysis;
- Undertake revised social distributional impact assessment; and
- Confirm that the Class C CAZ with traffic management remains the preferred option in consideration of the secondary critical success factors.

There are no further changes proposed to the core scheme.

Following ongoing discussion with and feedback from JAQU, the shortlist of proposed supporting measures has also been revised to exclude options that are not sufficiently targeted towards those affected by the proposed Class C CAZ. This includes the scalable abatement options for car drivers originally included in recognition of the wider improvements to air quality (refer to Section 3.3).

The OBC considered a further option of a Class D CAZ with the proposed boundary changes. Since the change to the boundary would have applied to both the Class D and Class C CAZ options, the Class D CAZ has not been assessed again following the process summarised above. This is for the following reasons:

- Any differences to the Class C CAZ with traffic management option could be expected to apply proportionately to the Class D CAZ option. Section 3.5 demonstrates that the main reason economic impacts differ between the OBC and FBC versions of the Class C CAZ option is because the rate of HGV upgrades is slower in the baseline scenario relative to previous analysis. This means that the difference in non-compliant vehicles between the baseline and intervention scenario is greater. The updated baseline figures increase weighted upgrade costs because people upgrade earlier than they would have. This means that on average HGVs are upgraded sooner and depreciation has a smaller impact on narrowing the gap between new vehicles and replaced vehicles. Although no formal traffic modelling has been undertaken to establish the impact of the revised boundary on the Class D CAZ option, it is likely that there would be a proportionate impact as the slower rate of HGV upgrades in the baseline scenario would be constant for this option too. Further, because

the Class D CAZ option affects cars, a slower rate of vehicle upgrades could affect a larger number of vehicles overall, leading to even greater differences in economic impacts. For further detail on the variance in economic impacts between the OBC and FBC analysis and likely causes see Section 3.5.

- The boundary extension consists almost entirely of residential areas, thus a Class D CAZ option with the extended boundary could place further adverse impacts on socio-economic groups that are not currently affected by a Class C CAZ. The socio-economic groups and vehicles types already affected by a Class C CAZ with the boundary extension would be equally affected by a Class D CAZ with the same boundary.
- Due to the reduced or removed impact on some socio-economic groups, the Class C CAZ option remains the most politically and publicly acceptable option. Following political decision, the Class C CAZ with traffic management was taken forward as the preferred scheme at final OBC stage.

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3.3 Assessment of Mitigation Measures

In the OBC, the CAZ C and D options were both complemented by the same package of supporting measures, described in Section 2.7.3.4. Under this approach, measures to support cars were considered primarily as mitigation for a Class D CAZ and as abatement for a Class C CAZ, in recognition of the contribution the measures would have to the improvement of air quality and increasing the likelihood of achieving compliance.

The compliant Class C CAZ scheme taken forward as the preferred option was achieved by combining the core charging scheme with traffic management measures at Queen Square, and a compliant bus fleet. It was subsequently recognised for the purposes of the FBC and the final CAF bid that it would be challenging to accurately and reliably model the additional abatement measures for cars in order that the air quality improvement in relation to value for money could be fully demonstrated.

Further research, development and detailed consideration of the options has resulted in a more targeted package of mitigation measures based on the impacted socio-economic groups, comprising predominantly of businesses. A series of measures have been identified from a long list of options. The full assessment and bid for funding is presented in FBC-46 Clean Air Fund Report in Appendix Y of this FBC.

The shortlisted items are:

- Expanding the existing CBTF programme by providing additional funding for retrofitting registered, local Euro 3/4/5 buses
- Financial support for replacing pre-Euro 6 diesel and pre-Euro 4 petrol non-compliant vehicles with compliant ones. This combines:
 - Financial support (grants) for replacing pre-Euro 6 diesel and pre-Euro 4 petrol vehicles and taxis/PHVs with compliant ones.
 - Financial support (interest free loans) for replacing pre-Euro 6 diesel and pre-Euro 4 petrol vehicles and taxis/PHVs with compliant ones.
 - Complementary financial support for installing electric charging points on private land in order to encourage the uptake of electric vehicles.
 - Complementary financial support for retrofitting in order to allow cheaper, non-compliant vehicles to be made compliant.
- Provide support and facilities for alternative delivery and servicing options for businesses. This combines:
 - Delivery and servicing plans for businesses.
 - Increased utilisation of the car/van club in Bath, with an emphasis on increasing the number of LGVs/vans available to businesses.
 - Expanding the proposal (included in Go Ultra Low package) to introduce 'last mile' electric cargo bike hire to the city.
- Provide a sustainable travel and transport team to facilitate the use of the mitigation schemes by the impacted groups and ensure uptake.

3.4 Economic Modelling Approach

Section 3.2.3 and 3.2.4 establish that the preferred option for the charging component of Bath's CAP is a Class C CAZ with traffic management. Further, in light of the revised boundary proposed for the Class C CAZ, additional traffic, air quality, economic and distributional modelling has been undertaken to determine the revised socio-economic impacts of the preferred option. The analysis presented in Section 3.5 to 3.7 provides a summary of the economic and distributional assessments for the preferred option, i.e. Class C CAZ with traffic management and a revised boundary.

Note that in Section 3.5, the economic impacts under the revised boundary are provided alongside the economic impacts stated within the OBC based on the previous boundary configuration. Justification is provided for any differential in economic impacts under the two boundary configurations.

The analysis focuses on the economic impacts associated with the CAZ and CAF components of the Bath CAP. The scheme costs associated with both CAZ charging and CAF mitigation measures have been determined through discussion with preferred contractors. Potential impacts have also been fully assessed and feature in Section 3.5 (mainly CAZ charging-related impacts) and Section 3.7 (mainly CAF mitigation-related impacts). As such, only the CAZ charging measure impacts are fully monetised; the CAF mitigation measure impacts are mainly considered qualitatively.

3.5 Economic Impacts

3.5.1 Health and Environmental Impacts

3.5.1.1 Greenhouse Gas Emissions

By changing travel behaviours (including number of trips, trip mode and vehicle type), the CAP may influence the quantum of Greenhouse Gas (GHG) emissions generated by road transport. A change in GHG emissions, and CO₂ emissions in particular, could generate variable effects on climate change processes.

Based on air quality modelling outputs, the Bath CAP is forecast to initially reduce and then slow the growth of GHG emissions across the appraisal period. Relative to the baseline scenario, the intervention scenario will therefore reduce the quantum of CO₂ emissions released into the atmosphere. This impact is monetised through the application of Department for Business, Energy and Industrial Strategy (BEIS) carbon prices.

The monetised impact of a change in GHG emissions is presented in Table 3-3, which demonstrates that the revised boundary Class C CAZ scheme will generate a smaller benefit (£127,000 versus £165,000 over the ten-year appraisal period). This is likely to be because the revised scheme shows more traffic on the network in the baseline scenario relative to the previous Class C CAZ scheme. Further, there are a higher number of residual non-compliant and older vehicles by 2030 in the intervention case relative to the previous Class C CAZ scheme.

Table 3-3: GHG impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|--|----------------------|--------------------------|
| Cumulative Difference in CO ₂ Emissions, 2021-30 (tonnes) | 2,834 | 2,165 |
| BEIS Carbon Prices, 2021-2030 (£/tonne) | 69.3 - 79.4 | |
| Present Value (PV) of Impact (£'s 2018 Prices) | £164,936 | £127,047 |

3.5.1.2 Air Quality (PM/NO₂) Emissions

Based on air quality modelling outputs, the Bath CAP is forecast to reduce the level of PM and NO₂ emissions across the appraisal period, contributing to an improvement in air quality. Improvements in air quality can lead to a range of public health, natural and built environment benefits. These benefits can be monetised through the application of JAQU's Damage Cost estimates.

The monetised impact of a change in air quality is presented in Table 3-4, which demonstrates that the scheme will generate a lower aggregate benefit under the revised scheme (£0.80 million over the ten-year appraisal period) compared to the previous Class C CAZ (£0.82 million). This is likely to be because the revised scheme shows more traffic on the network in the baseline scenario relative to the previous Class C CAZ scheme. Further, there are a higher number of residual non-compliant and older vehicles by 2030 in the intervention case relative to the previous Class C CAZ scheme.

Table 3-4: Air quality impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|---|----------------------|--------------------------|
| Cumulative Difference in NO ₂ Emissions 2021-2030 (tonnes) | 197.2 | 193.9 |
| NO ₂ Damage Costs 2021-2030 (£/tonne) | 4,927 - 5,888 | |
| PV of NO₂ Change (£'s 2018 Prices) | £832,466 | £818,668 |
| Cumulative Difference in PM Emissions 2021-2030 (tonnes) | -0.23 | -0.30 |
| PM Damage Costs 2021-2030 (£/tonne) | 87,729 - 104,845 | |
| PV of PM Change (£'s 2018 Prices) | (£17,208) | (£22,323) |
| Aggregate PV (£'s 2018 Prices) | £815,257 | £796,345 |

3.5.2 Impacts on Transport Users

3.5.2.1 Fuel Switch Impacts

The transport analysis assumes that some car drivers will switch fuel type from diesel to petrol when upgrading their vehicle in response to the CAZ charge. The change in fuel switch costs is reflected in the change in vehicle operating costs to the user, captured as part of the DfT's Transport User Benefits Assessment (TUBA) presented in Section 3.5.2.5. No additional or separate analysis is provided here.

3.5.2.2 Transaction Costs

Based on the traffic forecasting analysis, the Bath CAP will accelerate the rate at which vehicle owners' purchase or upgrade to compliant vehicles. Each upgrading transaction incurs time costs for vehicle owners relating to identifying and buying a compliant vehicle. By applying JAQU's recommended transaction cost data (provided as part of the National Data Inputs for Local Economic Models) to the number of vehicles anticipated to upgrade, Table 3-5 suggests that the revised scheme will impose a marginally lower transaction cost (just over £40,000 over the ten-year appraisal period) relative to previous Class C CAZ scheme (nearly £40,500). This is attributable to a marginally lower number of vehicles upgrading overall under the revised boundary Class C CAZ.

Table 3-5: Transaction cost impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|---|----------------------|--------------------------|
| Number of Vehicles Upgrading | 5,950 | 5,920 |
| PV of Transaction Cost (£'s 2018 Prices) | (£40,454) | (£40,241) |

3.5.2.3 Consumer Welfare Impacts

The proposed scheme will affect consumer's²⁴ behaviour by inducing a change in travel behaviour for non-compliant vehicle trips (for example through upgrading vehicles, using alternative modes, cancelling journeys etc, as suggested by the stated preference survey and reflected in traffic model forecasts). However, because consumers would have preferred their original action in the baseline, this change in behaviour leads to a consumer welfare impact. Two elements of analysis were identified to estimate aggregate consumer welfare loss as a result of intervention:

- Welfare loss associated with vehicles upgrading earlier.

²⁴ NB: by consumers, the analysis captures impacts on all highway users affected by the intervention, including businesses, commuters, leisure users etc

- Welfare loss associated with changing travel patterns or behaviours (i.e. mode shift, cancelled journeys, diverted journeys).

The cost of upgrading was estimated by establishing the average cost differential for upgrading a vehicle in the intervention scenario, compared to the baseline scenario. The cost differential was driven by the change in depreciation rates over time and therefore, the change in residual vehicle value between replacement and replaced vehicles, at the time of upgrading in the intervention scenario, relative to the baseline scenario. As vehicles were expected to upgrade earlier in the intervention scenario, the cost of upgrading is expected to be higher as the difference in value between replacement and replaced vehicles is also expected to be higher.

By applying the average cost differential for upgrading to the number of vehicles upgrading (split by vehicle type (i.e. LGVs, buses etc) and upgrade type (i.e. to new or used vehicles)) the consumer welfare loss associated with upgrading earlier is estimated to cost more under the Class C CAZ with revised boundary (nearly £14.8 million) compared to the previous Class C CAZ (£11.1 million), as shown in Table 3-6. This is because assumptions around the number and timing of HGVs upgrading have changed in the interim period between OBC and FBC. This change in assumptions is associated with the extension to the CAZ boundary as part of the FBC. Hence, an accelerated level of upgrading is discernible in the intervention case relative to the baseline case for the revised scheme compared to the previous scheme. This significantly increases the weighted upgrade cost for upgrading HGVs in the revised scheme, as accelerated upgrading means more vehicles are replaced earlier than they otherwise would be the case, resulting in greater loss of consumer welfare for vehicle owners induced to upgrade. This is linked to higher rates of depreciation for newer vehicles, as explained in FBC-18 'Economic Assessment Methodology Report' in Appendix F of this FBC. Note that this figure reflects use of the 'rule of half' to estimate the average loss to each upgrader.

Table 3-6: Consumer welfare: cost of upgrading impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|--|----------------------|--------------------------|
| Number of Vehicles Upgrading | 5,950 | 5,920 |
| PV of Consumer Welfare Loss (£'s 2018 Prices) | (£11,100,303) | (£14,819,604) |

The cost of changing travel behaviour was estimated by establishing the number of vehicle trips in the baseline that would be fundamentally changed in the intervention scenario. The cost of each individual trip cancelled, changed or switched to a new mode was assumed to be equal to half the cost of the charge. This approach, in line with JAQU's Options Appraisal Guidance, was adopted to reflect that only those trips that were valued at less than the cost of the charge were cancelled; any trips valued more than the charge were assumed to pay the charge. However, as it is not possible to value every trip that induced a behavioural response, each cancelled, changed or mode shifted trip was assumed to be valued at half the price of the charge.

That said, the traffic modelling analysis of the revised boundary Class C CAZ demonstrated that only 28% of non-compliant vehicle trips into the CAZ each day were made by unique vehicles. The charge would only be incurred once per day, irrespective of the number of trips through the zone. Therefore, consumer welfare loss would only be associated with the first trip into the CAZ each day (i.e. the trip that incurs the charge), not all trips. Combining the number of vehicle trips changed with the adjusted charge to enter the zone and further adjustments to reflect the proportion of unique vehicle trips through the zone, Table 3-7 indicates that the consumer welfare loss associated with changing travel patterns or behaviours could cost more than £8.8 million over the ten-year appraisal period under the revised Class C CAZ scheme. This is reduced to £7.6m million under the previous Class C CAZ. This is attributed to a greater number of baseline vehicles trips that are induced to change travel pattern or behaviour under the revised scheme, attributed to a larger boundary that affects more vehicles more frequently.

Table 3-7: Consumer welfare: cost of changing travel pattern or behaviour impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|--|----------------------|--------------------------|
| Number of Vehicles Trips Changed | 2,355,797 | 2,573,468 |
| Proportion of Unique Vehicle Trips Changed | 30% | 28% |

| | | |
|---|--------------|--------------|
| PV of Consumer Welfare Loss (£'s 2018 Prices) | (£7,639,766) | (£8,848,688) |
|---|--------------|--------------|

3.5.2.4 Vehicle Scrappage Costs

In line with JAQU guidance, it is assumed that the overall size of the vehicle fleet remains fixed within the upgrading process. Therefore, for every new vehicle purchased (25% of all upgrades as per JAQU benchmarks), an older vehicle is scrapped. The differential in lost asset value associated with scrapping a vehicle earlier in the intervention case relative to the baseline case allows monetisation of this impact. By combining the number of vehicles expected to be scrapped in the intervention scenario by the average differential in lost asset value between the intervention and baseline scenarios, Table 3-8 demonstrates that vehicle scrappage costs will amount to more under the revised Class C CAZ scheme (around £363,000 across the ten-year appraisal period) than the previous Class C CAZ (£318,000). This is because assumptions around the rate of HGVs upgrade have changed in the interim period between OBC and FBC. Hence, an accelerated level of upgrading (and therefore scrappage) is discernible in the intervention case relative to the baseline case for the revised scheme compared to the previous scheme. As such, the weighted residual vehicle value for scrapped HGVs is significantly higher in the revised scheme, as accelerated scrappage in the intervention scenario compared to the baseline scenario means a greater loss of residual asset value. This is linked to higher rates of depreciation for newer vehicles, as explained in FBC-18 'Economic Assessment Methodology Report' in Appendix F of this FBC.

Table 3-8: Vehicle scrappage cost impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|---|----------------------|--------------------------|
| Number of Vehicles Scrapped | 253 | 252 |
| PV of Vehicle Scrappage Costs (£'s 2018 Prices) | (£318,353) | (£363,403) |

3.5.2.5 Journey Time/Vehicle Operating Costs

By influencing travel patterns and behaviours, the scheme could also have an impact on transport economic efficiency (TEE), measured in terms of changes to journey time savings and vehicle operating costs. By reducing vehicle flows, increasing vehicle speeds and reducing congestion, travel time could be reduced alongside reduced running costs. Using DfT's TUBA software, the change in vehicle movements induced by the revised Class C CAZ scheme could result in a negative impact on journey times and vehicle operating costs amounting to approximately £100,000, as shown in Table 3-9. Under the previous CAZ C scheme, the TEE impacts were forecast to be positive at £1.1 million. The adverse impact under the Class C CAZ is attributable to the following factors:

- (i) The change in demand from the baseline scenario is negligible in the long term, and so impacts are limited and generally indistinguishable from modelling noise; and
- (ii) The Queen Square traffic management scheme acts to create some extra delays / longer routes which will negate the benefits from reduced traffic levels due to the CAZ

Table 3-9: Journey time/vehicle operating cost impacts (2018 prices)

| TUBA Impact Category | Total |
|-------------------------------------|------------|
| PV of TEE: CAZ C – OBC Boundary | £1,112,661 |
| PV of TEE: CAZ C – Revised Boundary | (£100,469) |

3.5.2.6 Accident Impacts

By changing travel patterns and behaviours, thus affecting vehicle trip numbers and speeds, the scheme could influence the frequency and severity of accidents. Utilisation of DfT's CoBALT software suggests that the number of accidents and casualties is expected to reduce slightly, leading to an accident benefit of £0.85 million (PV) under the revised Class C CAZ boundary. This benefit is lower than the £1.18 million (PV) forecast under the

previous Class C CAZ. The reduced benefit is associated with a smaller differential between baseline and intervention scenario traffic flows under the revised Class C CAZ scheme compared to the previous Class C CAZ scheme.

3.5.2.7 Walking/Cycling Impacts

Based on the findings of the stated preference survey (using work/employee/business trips by car as a proxy), the traffic modelling assessment assumes a small proportion of taxi and LGV trips would be induced to change mode in response to the CAZ. By inducing mode shift, the proposed scheme will increase the number of individuals making walking and cycling trips. This has a positive economic impact, primarily by improving the general health of people, by walking and cycling more regularly, and by reducing absenteeism from work. Using the DfT's Active Mode Appraisal Toolkit, the forecast growth in the number of walking and cycling trips is expected to lead to a benefit of around £0.43 million under the revised Class C CAZ boundary scheme. This value reduces marginally to £0.40 million under the previous CAZ C scheme. This is attributable to a higher number of vehicle trips in the baseline scenario under the revised scheme. This means more people are induced to switch mode to walking and cycling relative to the previous scheme.

Table 3-10: Walking/cycling impacts

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|--|----------------------|--------------------------|
| Number of Trips Changing Mode | 289,679 | 314,049 |
| Number of New Cycling Trips | 14,855 | 16,105 |
| Number of New Walking Trips | 193,119 | 209,366 |
| PV Monetised Impact (£'s 2018 Prices) | £396,048 | £428,928 |

Note that not all trips changing mode are assumed to switch to active modes. Some will switch to bus journeys (estimated 15%), rail (5%) and others. The impact of switching to non-active modes has not been monetised within this assessment, beyond the consumer welfare loss induced by switching mode in response to the intervention.

3.5.3 Costs to Central and Local Government

3.5.3.1 Set-Up Costs

The optimism bias-adjusted capital costs associated with delivering the Bath CAP are estimated at £22 million (PV) for the revised boundary Class C CAZ scheme. This is lower than the £41 million (PV) of capital expenditure forecast for the previous Class C CAZ scheme. This variance is attributed a number of changes since OBC submission:

- Updated costs provided through discussion and agreement with contractors
- Removal of 'scalable' non-charging measures (with the reduction in cost associated with this removal partially offset by an increase in the number of cameras and related infrastructure resulting from a larger boundary).
- Reduction in Optimism Bias rates in line with project progression (see FBC-18 'Economic Assessment Methodology Report' for explicit detail in changes in Optimism Bias). The reduction reflects the application of HM Treasury's Green Book lower bound rates for capital expenditure in place of upper bound rates previously used at OBC stage. In the absence of specific rates for operational expenditure, the same rates have been applied for both capital and operational items.

More detail on the derivation of these costs can be found within FBC-21 'Project Costs' in Appendix I of this FBC, FBC-18 'Economic Assessment Methodology Report' in Appendix F of this FBC and FBC-33 'Financial Report' in Appendix W of this FBC. This includes explicit detail on the application of optimism bias across the various capital items.

Table 3-11: Set-up cost impacts (2018 prices and values)

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|---------------------|----------------------|--------------------------|
| PV of Capital Costs | (£41,378,626) | (£22,271,303) |

3.5.3.2 Running Costs

Including all scheme components (excluding those funded by private match funding), the operational costs associated with delivering the Bath CAP, including the revised boundary Class C CAZ scheme, are estimated at £12 million (PV). This figure is well below the £26 million of operational expenditure forecast for the previous Class C CAZ. The revised scheme cost estimate is related to the same factors highlighted in Section 3.5.3.1, specifically greater certainty on costs linked to discussions with contractors and reduced levels of Optimism Bias. Also, the financial assistance mitigation measure which comprised a sizeable component of the OBC running costs has now been included within the set-up costs reported in Section 3.5.3.1.

More detail on the derivation of these costs can be found within FBC-33 'Financial Report' in Appendix W and FBC-18 Economic Assessment Methodology Report in Appendix F of this FBC. This includes explicit detail on the application of optimism bias across the various cost items. Note that revenue associated with CAZ charges and Penalty Charge Notices (PCNs) are ignored from the analysis on the basis that this economic benefit to local/central Government is neutralised by the economic cost to individuals of paying the charge/fine.

Table 3-12: Operational cost impacts (2018 prices and values)

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|-------------------------|----------------------|--------------------------|
| PV of Operational Costs | (£26,361,684) | (£12,247,340) |

3.5.4 Summary

By combining the economic impacts discussed in the previous sections, the Bath CAP with revised boundary Class C CAZ scheme could generate an NPV of -£56.5 million. This negative economic impact is less than the -£83.2 million impact forecast for the previous Class C CAZ scheme. This reduced negative economic impact is attributed to significantly reduced capital and operational scheme costs. This is primarily the result of greater cost certainty (influenced through discussion and agreement with contractors) and reduced requirements for Optimism Bias (as a consequence of greater cost certainty).

That said, some individual impact areas have experienced an increased negative impact – for example, consumer welfare linked to replacing vehicles. This increase can be attributed to changes in the baseline scenario traffic in the revised scheme, which forecast a much slower rate of upgrade than previously anticipated. This results in an increased weighted upgrade cost and weighted residual vehicle value under the revised scheme, as relatively speaking, vehicle upgrades (and scrappages) occur earlier under the revised scheme compared to the previous scheme.

It should be noted that the economic costs for the revised Class C CAZ scheme outweighs the economic benefits by a considerable margin. This is primarily driven by the loss in consumer welfare associated with changing travel patterns and behaviours and the onerous capital and operational costs.

Table 3-13: Net economic impacts (2018 prices and values £)

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|----------------------------------|----------------------|--------------------------|
| Present Value of Benefits | | |
| Air Quality: Changes in NOx | £832,466 | £818,668 |
| Active Mode Appraisal Toolkit | £396,048 | £428,928 |

| Impact | CAZ C – OBC Boundary | CAZ C – Revised Boundary |
|---|----------------------|--------------------------|
| Accident Analysis | £1,184,040 | £852,341 |
| GHGs | £164,936 | £127,047 |
| Journey Time/Vehicle Operating Costs | £1,112,661 | n/a (see below) |
| Present Value of Benefits (PVB) | £3,690,151 | £2,226,983 |
| Present Value of Costs | | |
| Journey Time/Vehicle Operating Costs | n/a (see above) | -£100,469 |
| Air Quality: Particulate Matter | -£17,208 | -£22,323 |
| Consumer Welfare: Behavioural Response – Replace Vehicle | -£11,100,303 | -£14,819,604 |
| Consumer Welfare: Behavioural Response – Cancel Trip/Avoid Zone/Re-mode | -£7,639,766 | -£8,848,688 |
| Vehicle Scrappage | -£318,353 | -£363,403 |
| Transactions | -£40,454 | -£40,241 |
| Capital Expenditure: Set Up Costs | -£41,378,626 | -£22,271,303 |
| Operational Expenditure: Running Costs | -£26,361,684 | -£12,247,340 |
| Present Value of Costs (PVC) | -£86,856,394 | -£58,713,372 |
| Net Present Value (NPV) | -£83,166,244 | -£56,486,389 |

Although the NPV has improved from OBC to FBC stage (primarily related to reduction in scheme costs), the scale of economic benefits (PVB) has reduced overall from £3.7 million to £2.2 million. This is primarily attributable to the reduction in journey time savings and vehicle operating costs associated with the FBC option. The reduction is related to the introduction of Queen Square traffic management, which introduces extra delay and longer routes but is necessary for the achievement of compliance.

To provide context for the scale of this NPV it has been compared to the Gross Value Added (GVA), the measure of the value of goods and services produced in an area of an economy, in B&NES. Across the 10-year period assessed, the NPV of the scheme represents less than -0.11% of the NPV of GVA in B&NES. During the same period the GVA is forecast to grow by 22%.

3.5.5 Comparison of Revised Scheme Impacts Against Other Shortlisted Options at OBC

The forecast negative economic impact of £56.5 million as a result of the revised boundary Class C CAZ scheme is less adverse than both the previous CAZ C scheme (as per Table 3-14) and the CAZ D scheme presented at OBC stage. However, the revised boundary Class C CAZ scheme and the earlier CAZ D scheme are not comparable, as any CAZ D scheme proposed as part of the Bath CAP would need to incorporate the same enlarged boundary as the revised Class C CAZ scheme.

It is likely that the same factors generating a less adverse economic impact for the revised Class C CAZ scheme would have a similar effect for a revised Class D CAZ. For example, greater cost certainty and reduction in Optimism Bias would reduce Class D CAZ capital and operational costs at a similar rate as for the preferred option.

Moreover, some of the increasingly negative impacts reported for the revised Class C CAZ scheme and linked to the enlarged boundary (e.g. greater consumer welfare loss), could be even more pronounced under a Class D CAZ scheme. In particular, the slower rate of HGV upgrading in the baseline scenario under the revised boundary

for the Class C CAZ would also occur under a Class D CAZ. The slower rate of HGV upgrading in the baseline scenario acts to increase vehicle upgrade costs under the revised scheme as it widens the differential rate of upgrading between the baseline and intervention scenarios relative to previous scheme. This means that in effect, people are upgrading earlier than they otherwise would have based on the updated baseline figures. Weighted upgrade costs are therefore higher due to the variable impact of depreciation over time, with earlier upgrading allowing less time for depreciation to narrow the differential cost between new and replaced vehicles. The same situation would occur under a revised Class D CAZ. Further, as a Class D CAZ also charges cars, the impact on HGVs could be replicated for cars too, leading to a significant worsening of economic impact relative to the assessment at OBC stage.

Within this context, it is believed that the OBC results which stated the Class C CAZ scheme performed better from an economic impact perspective relative to the Class D CAZ scheme would be maintained with the revised boundary. Therefore, even though updated analysis demonstrates a significantly improvement economic performance for the revised Class C CAZ scheme, the improvement in performance would be less evident for a revised Class D CAZ scheme which also affects private cars.

DRAFT

3.6 Sensitivity Analysis

3.6.1 Traffic Modelling and Air Quality Sensitivity Testing

There are many components that contribute to the uncertainty of modelling predictions. The road traffic emissions dispersion model used in this assessment is dependent upon the traffic data that has been input, which will have inherent uncertainties associated with them. There are then additional uncertainties, as models, both traffic and air quality, are required to simplify real-world conditions into a series of algorithms.

However, these uncertainties are not specific to this project, and are inherent in any traffic and/or air quality modelling project. The development of the base and baseline models has followed Government guidance and best practice throughout in order to minimise the level of remaining uncertainty.

The base year modelling, both traffic and air quality, has been verified against recent and reliable observed/monitored data, providing reasonable confidence in the 2017 model. Predicting pollutant concentrations in a future year will always be subject to greater uncertainty. For obvious reasons, the model cannot be verified in the future, and it is necessary to rely on a series of projections provided by the DfT and Defra as to what will happen to traffic volumes, background pollutant concentrations and vehicle emissions.

To assess the uncertainty further, a series of sensitivity tests have been undertaken on both the baseline and preferred option models as set out in Table 3-14. Full details of this assessment are provided in FBC-31 'Sensitivity Test Report' in Appendix N of this FBC and a summary of the tests undertaken is provided in Table 3-14 below.

Table 3-14: Summary of sensitivity tests

| Traffic modelling | Air quality modelling | Impact of a simultaneous CAZ in Bristol |
|--|---|--|
| <ul style="list-style-type: none"> • Uncertainties in the Transport Model at the National Level • Fleet splits by fuel type: ANPR vs. WebTAG • Fleet splits by European emissions standards: EFT option 1 vs option 2 • Fleet splits by Euro Standards: high and low fleet renewal • Behavioural response to charging | <ul style="list-style-type: none"> • Differential bias • Euro 6 vehicles • LGV Emissions • Lower Uptake of Compliant LGVs • Inappropriate Emissions Groupings • Engine Size and Vehicle Weight • Average speed emissions factors • Emissions at low speeds • Background concentrations • Model verification • Receptor locations • Road widths and geometries • Gradients • Meteorological Data • Meteorological Parameters • Primary NO₂ Fraction • Regional Ozone • Non-Road Sources • Lower Uptake of Bus Retrofitting | <ul style="list-style-type: none"> • Analysis of Census Data • Analysis of SP Survey Data • Analysis of ANPR Data |

The sensitivity tests have been designed to assess the robustness of the modelling as well as the CAZ scheme. The tests show that with the changes to the assumptions in the modelling (i.e. an increase or decrease in flows, different composition of fleets, meteorological data, etc.) that the CAZ model outputs are still largely showing scheme compliance. The report also covers analysis into who may be affected by a simultaneous CAZ in Bristol

and Bath, which is shown to affect a small number of LGV and HGV vehicles. Out of twenty-seven issues considered in the sensitivity test report, only two tests indicate two or more locations not reaching compliance and five tests showed one location not reaching compliance in 2021. Ten tests indicated compliance would still be reached at all locations. For the other issues considered, there was either no reliable way to reflect the issue or no reason to change the core assumption. Hence, overall, the scheme assessment has been demonstrated to show very little variation in results under the range of reasonable alternative assumptions considered.

3.6.2 Economic Modelling Sensitivity Testing

A number of isolated sensitivity tests were assessed within the economic model. This involved changing some of the key input assumptions to the economic model as outlined below.

- Implementation costs
- Damage costs
- Carbon prices
- Vehicle non-compliance
- Upgrading rate
- Charge rate

Further detail on the specification of the economic model sensitivity tests is provided in FBC-18 'Economic Appraisal Methodology Report' in Appendix F of this FBC. The results of the sensitivity tests are outlined in Table 3-15, which demonstrates the NPV of the revised boundary Class C CAZ scheme could range between -£52m and -£62m, around a core assessment of -£56m.

Table 3-15: Sensitivity Analysis Summary NPV (2018 prices and values)

| Key Assumption Changed | Low/Pessimistic | Core | High/Optimistic |
|---------------------------------|------------------------------|-----------------------------|-----------------|
| Implementation Costs | (54,259,270) | (£56,486,389) | (58,713,529) |
| Damage Costs | (52,865,106) | (£56,486,389) | (56,497,564) |
| Carbon Prices | (56,549,912) | (£56,486,389) | (56,422,865) |
| Vehicle Non-Compliance Scenario | (57,371,258) | (£56,486,389) | (55,601,520) |
| Charge Rate | (52,062,045) | (£56,486,389) | (60,910,733) |
| Key Assumption Changed | All Entrants Upgrade Equally | Most Frequent Entrants Only | |
| Upgrading Rate | (61,755,731) | (£56,486,389) | |

3.7 Distributional and Equalities Impact Assessment

For the FBC, the distributional and equalities impact assessment undertaken for the OBC was reviewed for the revised boundary of the preferred option. Detail on the methodology and results of the assessment can be found in FBC-19 'Distributional and Equalities Impact Assessment' in Appendix G of this FBC. The key findings of the assessment in relation to the preferred option of a Class C CAZ with the revised boundary are replicated below:

3.7.1 Baseline – Pre-Intervention Condition

The baseline socio-economic conditions affecting key social and business groups can be described as follows:

- B&NES is home to approximately 189,000 residents; the proposed CAZ area contains the most densely populated communities in the local authority area

- B&NES is relatively affluent; however, there are pockets of income deprivation in the west of the city (as well as less pronounced deprivation within the immediate CAZ boundary).
- Most communities in the central area have a low concentration of children but a high proportion of elderly residents.
- The central areas of the city have a low concentration of female residents and very few people from ethnic minority backgrounds reside within the city.
- The B&NES economy consists of approximately 84,000 jobs across 8,200 businesses (mainly SMEs and micro businesses). Around 2,400 of these businesses and 29% of employment are located within the central area, predominantly in retail, tourism and high value sectors (e.g. finance and insurance and ICT).
- Economic output and productivity for employees is higher than average, with £55,000 of gross value generated per filled job.
- There are significant levels of vehicular non-compliance in B&NES, including 90% for LGVs.
- A range of key infrastructure, including the employment core, schools, community centres, care homes and general practices and green space, are all located within the proposed CAZ boundary.

3.7.2 Post-Intervention Impacts

Tables 3-16 and 3-17 present a summary of the key findings of the distributional and equalities impact assessment. The analysis conducted relates to the locations where the benefits/disbenefits accrue and it has been mapped to the populations that live in those areas. The analysis represents the relative distribution of impacts on socio-economic quintiles compared to that quintiles' population share across B&NES.

Table 3-16: Air Quality Impacts on Relevant Socio-Economic/Business Groups

| Socio-Economic/Business Group | Quintiles | | | | | Are Impacts Distributed Evenly? |
|--|-----------------------|--------|--------|--------|--------------------------|---------------------------------|
| | 0-20% (most deprived) | 20-40% | 40-60% | 60-80% | 80-100% (least deprived) | |
| Low-Income Households (Income Deprivation) | ✓✓ | ✓✓ | ✓ | ✓✓ | ✓✓ | Yes |
| Children | ✓✓✓ | ✓✓ | ✓ | ✓✓ | ✓ | No |
| Elderly Residents | ✓✓ | ✓✓✓ | ✓✓✓ | ✓ | ✓ | No |

Table 3-17: Affordability and User Benefit Impacts by Income Deprivation

| Measure | Quintiles | | | | | Are Impacts Distributed Evenly? |
|---|-----------------------|--------|--------|--------|--------------------------|---------------------------------|
| | 0-20% (most deprived) | 20-40% | 40-60% | 60-80% | 80-100% (least deprived) | |
| Affordability impacts due to vehicle operating cost changes | xx | ✓ | ✓✓✓ | ✓ | ✓✓ | No |
| User Benefits | xx | xxx | ✓✓✓ | ✓ | ✓✓✓ | No |

The key conclusions of the assessment are:

- Air quality benefits are felt across the majority of Bath, with a minor decrease in air quality reported in two LSOAs in low income areas. Beneficial impacts accrue across low-income groups, with greater proportions of low-income households (i.e. those in areas that are most income deprived) benefitting relative to this group's share of the overall population in B&NES.

- There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the CAZ area and impacts of the supporting abatement measures. These benefits are likely to be concentrated on existing bus users who are typically more likely to be from lower income groups, older people and households without a car than the background population.
- Whilst car drivers will not be subject to CAZ charges, there are negative affordability and user benefits for residents in B&NES due to the traffic management scheme, with those in the 0-20% and 20-40% income groups seeing the largest share of the disbenefits.
- It should be noted that the scale of vehicle operating cost and user benefit impacts are relatively small, particularly when distributed across the modelled area, and as such small changes in benefits/disbenefits could impact the overall assessment scores.
- The scheme is also likely to result in a mix of small scale positive and negative noise, accident, and severance impacts because of traffic flow changes. These impacts are concentrated within the CAZ charging zone with impacts on lower income areas, areas with few children and areas with a higher proportion of disabled people. There is an overall benefit for pedestrians, however, impacts for people cycling and motorcycling are more mixed.

3.7.3 Post-Intervention and Mitigation Impacts

In light of the adverse distributional and equalities impacts relating to affordability and accessibility, a range of mitigation measures are included in the economic appraisal as listed in Section 3.3.3. Funding will be sought from the CAF to deliver these mitigation measures, which are designed to provide greater choice, increase capacity for changing travel behaviours and minimise the cost burden of making such changes, especially for businesses. This will aim to alleviate the adverse affordability and accessibility impacts generated by the intervention. A series of concessions/exemptions are also proposed to provide further mitigation to vulnerable groups. Full details are provided in FBC-05 'Proposed System Design Features and Payment Exemptions' within Appendix A of this FBC.

Based on the range of adverse impacts, the following mitigation measures are proposed to support the transition towards the CAP for vulnerable and protected socio-economic groups:

- Expanding the existing CBTF programme by providing additional funding for retrofitting registered, local Euro 3/4/5 buses;
- Financial support for replacing pre-Euro 6 diesel and pre-Euro 4 petrol non-compliant vehicles with compliant ones;
- Provide support and facilities for alternative delivery and servicing options for businesses;
- Provide a sustainable travel and transport team to facilitate the use of the mitigation schemes by the impacted groups and ensure uptake.

More detail on the specification of each of these mitigation measures is provided in FBC-46 'Clean Air Fund Report in Appendix Y of this FBC.

Consideration of how each proposed measure will mitigate the potential distributional impacts of the intervention is outlined below:

- Providing additional funding for bus retrofitting will not only support the achievement of a compliant scheme, but also mitigate the adverse affordability impacts on bus operators of the charging zone.
- Financial support is proposed to support businesses and individuals suffering from adverse affordability impacts associated with the cost of upgrading to compliant vehicles. Support will be provided to businesses and individuals, with a focus on taxi/private hire firms and businesses with a reliance on HGVs and LGVs. Financial support is proposed to mitigate against the cost of replacing vehicles with compliant ones. Support will be also provided to allow for the installation of electric charging points on private land, for example in bus and coach depots. This will reduce the financial cost facing businesses who wish to purchase an electric vehicle, thereby making the option more affordable.

- Increasing the uptake of delivery and servicing plans, providing electric cargo bike hire and facilities and the option of electric van hire for businesses will help local businesses proactively respond to the CAZ charges and manage its impacts on servicing and deliveries.

In effect, the mitigation measures highlighted above are expected to alleviate many of the adverse accessibility and affordability impacts of the scheme. The uneven distribution of impacts is also expected to be reduced as a result of schemes specifically targeted at groups that are most affected by the scheme (e.g. introduction of financial support for replacing non-compliant vehicles; specifically targeted at businesses). Hence, the mitigation measures are considered appropriate for CAF support.

3.8 Economic Impact of the Clean Air Fund Measures

The economic impacts outlined in Section 3.5 predominantly relate to impacts associated with the CAZ component of Bath's CAP. Section 3.7 demonstrates that there is a clear case for implementing mitigation measures to minimise the potential negative effect of the CAZ on local businesses. Within this context, B&NES are requesting capital and operational grant funding from the CAF to support delivery of the mitigation measures identified above.

Alongside this request, an attempt has been made to monetise the impact of each of the mitigation measures specified in Section 3.7. The impact is outlined in Table 3-18 below. More detail on the approach to monetising the impacts is presented in FBC-46 'Clean Air Fund Report in Appendix Y of this FBC.

Table 3-16: Economic Impact of CAF Mitigation Measures (Undiscounted)

| CAF Mitigation Measure | Costs | Benefits | Difference |
|---|-------------------|-------------------|----------------|
| Additional retrofit funding for registered, local Euro 3/4/5 buses (2018 Prices) | 2,313,900 | 4,016,961 | 1,703,061 |
| Financial support for replacing pre-Euro 6 diesel and pre-Euro 4 petrol non-compliant commercial vehicles with compliant ones (2019 Prices) | 10,842,688 | 10,842,688 | 0 |
| Provide support and facilities for alternative delivery and servicing options for businesses (2019 Prices) | 1,096,000 | 1,836,432 | 740,432 |
| Provide a sustainable travel and transport team to facilitate the use of the mitigation schemes by the impacted groups (2019 Prices) | 1,183,059 | | -1,183,059 |
| General Staff Costs (2019 Prices) | 354,918 | | -354,918 |
| Total | 15,790,565 | 16,696,081 | 905,516 |

Note that the costs in the table above do not include optimism bias. Further, the analysis does not present all monetary values in discounted terms using a consistent price base. Nevertheless, the approach adopted above does suggest that the CAF mitigation measures could generate a marginally positive NPV. That said, traditional cost-benefit analysis perspectives do not reflect the full scale of impacts that will result from the mitigation measures. For example, non-quantifiable benefits are not captured as part of the monetised analysis. As such, a range of additional non-quantified benefits linked to delivery of the mitigation measures are outlined below.

- Reduced severance for some rural communities that may lose access to Bath City Centre. As bus companies would be expected to cancel some services in response to the CAZ (in the absence of bus retrofitting); and therefore the mitigation measure will ensure that services are retained.
- Given the rural nature of Bath and North East Somerset, the bus network is characterised by multiple operators including a number of small, locally focussed operators. The mitigation measure will ensure that the cost of upgrading to compliant vehicles does not fall on small operators, thus removing the challenge to their long-term viability.

- By ensuring bus services are retained, the mitigation measure will avoid any negative publicity associated with reducing key public services.
- By ensuring bus services are retained, the mitigation measure will support wider efforts to achieve mode shift from private vehicle use to public transport. Attempts to promote use of public transport could appear illogical if the bus network contracted in response to the CAZ.
- Prevent job losses amongst trades people in Bath, as the availability of financial support allows vehicular upgrade.
- Maintains Bath as a location that is attractive to local trades people, ensuring that consumers continue to have choice.
- Supports dependent businesses such as retail. The financial support measure safeguards the delivery of stock on a reliable basis. This will help prevent job losses and help maintain the vitality and viability of Bath City Centre.
- Supports the leisure and tourism industry in the city by providing opportunities for eligible coach companies to access financial support.
- Most businesses across all sectors are reliant to some extent on freight or delivery services. If non-compliant vehicles continued to enter the CAZ, any associated charge would likely be passed on to end consumers. Provision of financial support for eligible freight vehicles reduces the amount of non-compliant freight vehicles entering the CAZ and therefore helps to minimise pass-through of CAZ costs.
- Protects local freight businesses and traders by reducing the capital cost burden of upgrading to compliant vehicles. This is particularly important for SMEs and sole traders, who may be more vulnerable to a significant financial shock such as upgrading to a compliant vehicle.
- Provides a monetary stimulus for the local economy as new vehicles may be purchased from local dealerships.
- Prevents negative publicity. In the event that SMEs or trades people went out of business as a consequence of the CAZ, both B&NES and central government may be perceived as providing a lack support for vulnerable business groups.
- Promotes more active and healthier lifestyles through support for active mode alternatives via the electric cargo bike infrastructure.
- The option of electric van hire could have a positive impact on the emerging electric vehicle market. The measure could convince more people to switch to electric vehicles. Further, by encouraging the use of electric vehicles, the mitigation measure will increase awareness of a nascent market. Electric vehicles will also contribute to lower operating costs and noise pollution.
- Protects local businesses and traders by providing alternatives to non-compliant LGV use. This is particularly important for SMEs and sole traders, who may struggle to identify these opportunities alone.
- Will ensure the leisure and tourism industry is aware of opportunities to access support in dealing with the transition to the CAP.

Further, B&NES is committed to minimising the impact of the CAP on individuals and businesses whilst ensuring compliance with air quality standards (i.e. by avoiding further exemptions or concessions). Hence, B&NES consider the proposed set of measures to be the best approach to achieving this commitment.

3.9 Summary

The economic appraisal, pivoting from the transport and air quality modelling assessments, considers the economic costs and benefits of the preferred option that has been demonstrated to achieve air quality standards compliance in the shortest possible timeframe (i.e. 2021), a Class C charging option with associated non-charging measures and traffic management. For the FBC this has been undertaken with respect to the changes in the proposed boundary of the scheme following completion of the OBC.

The economic appraisal demonstrates that the scheme generates a significant negative NPV of -£56.5million. This is substantially lower than the value referred to in the OBC (c. -£83 million). This decrease is attributable to a greater cost certainty and less onerous Optimism Rates for capital and operational expenditure. That said, some economic impacts have worsened since OBC submission (e.g. consumer welfare, linked to the scale and timing of vehicle upgrades). This trend is attributed to a slower rate of upgrading for HGV vehicles in the baseline scenario for the revised boundary Class C CAZ, relative to the OBC analysis assessing the smaller CAZ boundary. In the absence of formal modelling of a revised boundary Class D CAZ, it is believed that the Class C CAZ scheme's status as preferential to the Class D CAZ scheme from the OBC would be maintained with the revised boundary. This is because the greater cost certainty and application of reduced Optimism Bias rates would affect both Class C and Class D CAZ schemes in a similar manner, resulting in no overall change in comparative performance. Further, the slower rate of upgrading for HGVs in the baseline scenario would apply equally to the assessment of both a Class C CAZ and a Class D CAZ. In fact, as a Class D CAZ affects cars as well as larger vehicles, the impact of slower upgrading in the baseline scenario could have an even greater effect for a Class D CAZ. Further, the distributional and equalities impact assessment demonstrates that the scheme will generate significant adverse distributional impacts for businesses and residents within Bath.

It should also be noted that the economic appraisal outputs above include the capital and operational costs associated with implementing the CAF mitigation measures but do not capture the potential economic impacts or benefits of these scheme components. Section 3.8 demonstrates that the CAF mitigation measures could generate £34.5 million in economic benefits associated with avoided costs for businesses. Due to the high-level estimation process undertaken to derive these potential benefits, they are not captured within the NPV calculation presented in Section 3.5. That said, the CAF-related capital and operational expenditures are included. As such, inclusion of these potential benefits could further improve the overall economic performance of the preferred CAP scheme.

4. Commercial Case

4.1 Introduction

The Commercial Case for the project takes into account the works and services required to deliver the CAP, the risks associated with the delivery and the procurement routes available to achieve the project in the most efficient way possible. This section describes the commercial strategy for delivering the Bath CAP.

FBC-20 'Procurement Strategy' in Appendix H of this FBC, includes the detailed Procurement Strategy and outlines in more detail the proposed procurement methodology in the following sections, which is required to ensure the timely delivery of an effective CAP in Bath.

For the purposes of the FBC, the commercial case has been updated to include developments since the OBC and the current status of the procurement of works and services to deliver the CAP.

4.2 Output Based Specification

A range of works and services need to be procured to deliver the preferred option.

When considering implementation and operation of the charging CAZ preferred option, the following activities require procurement:

- Roadside technology (ANPR cameras) and enforcement vehicle;
- Queen Square traffic signals and associated civil engineering works;
- On-road infrastructure (signs, cabinets, posts/lamp columns, ducting, cabling, power);
- Variable message signs (VMS);
- Traffic signal timings and operational system (SCOOT) survey;
- Communications networks (roadside to back office and back office system-to-system);
- Queen Square traffic signals and public realm enhancement scheme;
- Queen Square associated ITS works (CCTV/AQ MESH/UTMC interfaces/controller configuration changes);
- Back office payment and penalty system, including integration with the central payment service (software);
- Back office server and data processing facilities (hardware);
- Operations (staffing, provision of control room facilities);
- Pre-scheme surveys and permanent traffic count sites for ongoing surveys;
- ANPR cameras for Wiltshire CC;
- Health and wellbeing study;
- Residents parking zone (RPZ) review and potential extension;
- Communications and engagement;
- Design and specification;
- Traffic management; and
- Maintenance and support.

In addition, the mitigation measures associated with the preferred option will require procurement of the following works and services:

- Financial loan and grant schemes;

- Telematics devices (to inform the financial loan and grant scheme);
- Delivery and Servicing Plans for businesses;
- Car/van club expansion;
- Electric cargo bikes and storage facilities;
- Freight pilot study; and
- Travel advisors and staff to manage and operate the CAF measures.

4.3 Procurement Options

The OBC recommended that the CAZ for Bath is delivered through a range of existing procurement arrangements established by B&NES. They already have existing fit for purpose arrangements in place and identified the following advantages of making use of these existing contracts:

- It is the most likely compliant procurement route to meet the tight timescale requirements for implementation.
- It enables CAZ operations to be aligned with existing operations with minimal overheads and impact on existing functions.
- Quality standards are understood and tested through previous/existing use of these contracts.
- The market has been previously tested and value for money has already been established – further soft market testing has been undertaken to confirm that this is still the case.
- Allows for innovations and savings to be made through existing supply chain relationships.

This approach is now being used in order to procure the works.

Whilst it was anticipated that the works will mostly be delivered by existing contractual arrangements, it was recognised by the OBC that in some instances existing agreements may not be wholly suitable. For example, to provide the required ANPR cameras, a Voluntary Ex Ante Transparency (VEAT) notice was used where technical system continuity is absolutely essential, and competition would not be in B&NES's interest.

This assumption regarding 'technical continuity' was challenged internally within B&NES as to whether a new supplier could fulfil B&NES's requirements more effectively. Discussions were held and alternatives investigated and it was eventually agreed that the VEAT notice was the best course of action to deploy the most suitable system whilst additionally bringing the benefit of allowing integration with B&NES's existing enforcement infrastructure.

An existing contract does exist with the preferred contractor with many of the items required for the CAZ available on it. However, the existing contractual maximum spend limit (£410,000) would be breached with the larger volume of cameras required. This large CAZ requirement was not anticipated when this contract was originally awarded in November 2017. A VEAT notice was therefore advertised and did not undergo any form of challenge, and thus this aspect of the work is now progressing with the preferred supplier. Table 4-1 summarises the required procurement tasks and proposed procurement routes, for all items required by the preferred scheme option, along with the current progress status of these.

Table 4-1: Summary of required procurement tasks

| Procurement item | | Procurement Route | Status |
|--------------------------|--|---|---|
| CAZ System and Operation | Automatic Number Plate Recognition (ANPR) Cameras & Mobile Enforcement Vehicle (MEV) | Existing OJEU contract – ‘Provision of ANPR Cameras’ – new direct award following VEAT notice | Works awarded to contractor which has undertaken several site visits and established a ‘trial site’ |
| | Queen Square Traffic Signals only | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | BoQ prepared & programming discussions taken place. Anticipated timescales moved forward to align with other B&NES essential works |
| | Installation of scheme cabinets, posts (where lighting columns cannot be used), ducting, network switches and fibre cabling | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | Quotation provided by supplier to deliver scheme – mini order issued to install ‘trial site’. Full scheme works anticipated to commence shortly |
| | Variable Message Signs (VMS) | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | Quotation provided by nominated sub-contractor |
| | SCOOT Review (Bath) | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | Awaiting confirmation of cost from nominated sub-contractor |
| | Communications – Wireless | Existing ‘Wi-fi Solution for Bath’ contract – new award via RM3808 Network Services 2 framework Lot 1 | Quotation provided by supplier to supply wireless infrastructure – order issued for trial site only |
| | Communications – Network Switches | Existing ‘Wi-fi Solution for Bath’ contract – new award via RM3808 network Services framework Lot 1 | Quotation provided by supplier to supply network switches – order to be placed soon |
| | BT lines – communications (backhaul) | New direct award. CCS Network Services 2 Framework RM3808 Lot 1 or 2 | Awaiting completion of site surveys to determine exact cost – BT have provided unconfirmed estimate at this time |
| | Camera mounting – replacement Council street lighting columns & essential power supply works | Existing Street Lighting maintenance & installation contract (NEC3) | Works awarded to contractor |
| | Scheme signage (including posts) | Existing Highways term maintenance contract (NEC4) | BoQ prepared and discussions underway regarding programming |
| | Queen Square (civils works) | Existing Highways term maintenance contract (NEC4) in conjunction with larger civil engineering works | Discussions underway regarding programming. Anticipated timescales moved forward to align with other B&NES essential works |
| | Queen Square Public Realm Scheme | Existing Highways term maintenance contract (NEC4) in conjunction with larger civil engineering works | Feasibility design agreed but final scheme not yet agreed |

| Procurement item | Procurement Route | Status |
|--|---|--|
| Queen Square – CCTV monitoring | 3 quotations from approved suppliers list | Quote provided from 'common' supplier for nearby location (lasts 30 days only so not yet issued) |
| Queen Square – SCOOT validation/controller set up and commissioning | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | Quote provided by nominated sub-contractor. Ready to be progressed |
| Queen Square – UTMC interfaces for active control of signals using Air Quality data | Existing WoEITS Contract for Supply, Installation & Maintenance of Traffic Control & ITS Equipment | Quote provided by nominated sub-contractor. Ready to be progressed |
| Back office processing and payments system | Existing contract 'The Provision of a Parking Management Information System' (ESPO 509 Framework) | Quotation provided by supplier to supply system software – work anticipated to commence soon |
| Back office additional server for system operation/storage | Existing contract 'The Provision of a Parking Management Information System' (ESPO 509 Framework) | Quotation provided by supplier to supply servers (hardware) – work anticipated to commence soon |
| Control room | In house provision using B&NES existing Property Services contractual arrangements as required | Detailed design to be once location agreed |
| SRN Signage | B&NES pay Highways England directly to commission Ringway (current Area 2 works contractor) to implement required works | Sign locations accurately determined and shared with HE. Awaiting detailed costs. |
| Permanent Automatic Traffic Counters | New direct award. CCS TMT2 Framework RM1089 Lot 15 | Received accurate final costs from supplier following initial survey |
| Queen Square – Permanent Air Quality Monitor on Gay Street | B&NES Air Quality team - 3 quotations received from approved suppliers list | Quotation received by B&NES AQ team - item ready to be ordered |
| ANPR cameras – requested by Wiltshire Council | Anticipated use of contracts discussed herein | Detailed design not yet progressed – awaiting instruction |
| Pre-scheme baseline surveys | Existing South West Collaborative call-off Framework for Traffic Data Collection | Quotation received and order to be placed shortly |
| Residents Parking Zone (RPZ) review and updates | Existing Highways term maintenance contract (NEC4) | Review underway but detailed civil engineering requirements yet to be determined. Contract SoR will be used. |
| Community Liaison Events, Publicity & Advertising | B&NES Marketing and Communications Team - New & Existing arrangements (low cost) | Quotations received and ready to be progressed |
| Detailed Design of Core Scheme | B&NES Design and Projects, street lighting, highways, traffic signals, air quality, legal, procurement in house staff working with external consultants | Works ongoing |

| Procurement item | | Procurement Route | Status |
|---------------------|---|--|---|
| Design Works | Professional Services | Existing Bristol City Council Professional Services Framework & Crown Commercial Services Framework RM3741 | New works order issued to progress design work and project management |
| | Staff to Manage CAZ operations & CAF measures | Direct external appointment and / or redeployment from relevant service areas with vacancies backfilled | Some job descriptions approved by B&NES HR - others pending before being allowed into works structure |
| | Health and Wellbeing Study | Direct award and/or in-house provision using existing contract | Quotation received and ready to be progressed |
| Mitigation Measures | Bus Upgrades | No procurement required. Funds issued to bus companies once evidence provided (including match funding) | Detailed costs returned by all suppliers to inform funding application |
| | Financial Support Scheme | New direct award to specialist finance companies (to administer scheme) creating a new framework arrangement | Procurement documents drafted. ITT ready for issue once legal agreements finalized |
| | Telematics Devices | Yorkshire Purchasing Organisation (YPO) Dynamic Purchasing System (DPS-750) Vehicle Telematics Framework | Soft market testing undertaken with prospective suppliers. ITT to be produced shortly |
| | Delivery and Servicing plans (DSP) for business | New direct award. CCS TMT2 Framework RM1089 Lot 12 | Pilot scheme in progress with 5 businesses (with costs assumed for subsequent businesses) |
| | Expansion of Car Club network | Direct award and/or in-house provision using existing contract arrangements | Estimated cost produced using B&NES Schedule of Rates |
| | Last Mile Delivery | New Open Tender | Existing contract to be amended and advertised. Anticipated cost based upon existing contract |
| | City Freight pilot | Direct award and/or in-house provision using existing contract arrangements | Detailed design not yet progressed |
| | Scheme Decommissioning | Existing contracts (various) | Design work not yet undertaken or contractors engaged on this |

The proposed procurement route for each item listed in Table 4-1 **Error! Reference source not found.**, in relation to the available existing agreements, is described in more detail in FBC-20 'Procurement Strategy' in Appendix H of this FBC.

4.3.1 Payment Mechanisms, Pricing Framework and Charging Mechanisms

The financial arrangements with new suppliers providing works to implement the Bath CAZ are largely confirmed following a period of supplier engagement. There remain a small number of works packages which are not yet fully scoped ready for contract award but those works are awaiting confirmation of acceptance from central government and provision of the appropriate funding. Once agreement is confirmed these respective works

packages will be issued. Where existing procurement arrangements and contracts are to be utilised, pricing and payment for the works and services will be on the basis of those existing arrangements.

Unless otherwise agreed, payment terms will be in accordance with B&NES standard payments terms, nett 30 days from date of invoice and in arrears, following completion of the work.

4.3.2 Risk Allocation and Transfer

As with any agreement, there is always the risk of contract failure, or failure of the contractor to supply on time or to supply faulty goods and defective work. It is however possible to mitigate some risk by procuring via current B&NES framework agreements or contracts. B&NES has established working practices with existing contractors, and they have a working knowledge of B&NES specific requirements and existing assets. In addition, the reduction in timescales and resources required to procure services and materials, coupled with the certainty of having a supplier in place when required, are vital to achieving the delivery timescales of the project.

Whilst this procurement approach offers benefits in terms of risk mitigation, there remain some key risks which are required to be managed and accounted for. These are summarised in Table 4-2 below.

Table 4-2: Procurement Risks and Mitigation

| Risk | Likelihood | Impact | Mitigation |
|--------------------------------------|------------|--------|---|
| Design | Low | High | <ul style="list-style-type: none"> Ensure compliant processes are followed Ensure designers are suitably skilled/qualified |
| Legislative risks | Low | High | <ul style="list-style-type: none"> Ensure compliant processes are followed Adhere to regulations and standards Check all contract documents thoroughly |
| Construction risks | Medium | Medium | <ul style="list-style-type: none"> Notify HSE of project works via F10 form Undertake surveys Hold pre-commencement meetings with all engaged suppliers |
| Procurement is challenged | Medium | High | <ul style="list-style-type: none"> Ensure compliant processes Allow sufficient time to complete another procurement exercise |
| Failure to deliver on time | Low | High | <ul style="list-style-type: none"> Early engagement with suppliers Good contract management Appropriate contractual clauses – for example time is of the essence |
| Supplier poor workmanship | Low | Medium | <ul style="list-style-type: none"> Ensure design is robust and 'buildable' Site supervisor to be employed B&NES staff to be involved as taking on assets post delivery |
| Supplier staff shortages | Medium | High | <ul style="list-style-type: none"> Early engagement with suppliers Ensure program is realistic and has some 'float' Delay other schemes to prioritise CAZ with framework suppliers Client delivery staff to attend sites and build rapport with suppliers |
| Supply chain breaks down | Medium | High | <ul style="list-style-type: none"> Early engagement with suppliers BREXIT/currency risks identified – request fixed prices for longer Many CAZs in UK at same time – issue advanced orders to contractors |
| Supplier goes out of business | Low | High | <ul style="list-style-type: none"> Ensure appropriate financial checks are undertaken Consider alternative supply chains – for example Constructionline |
| Technology inadequate | Low | High | <ul style="list-style-type: none"> Consulted with industry experts during design process Establish 'trial site' to test wireless technology (in advance of launch) Liaise with suppliers for alternative options |

| | | | |
|---|-----|------|---|
| No suppliers bid for mitigation measures contracts | Low | High | <ul style="list-style-type: none"> • Early supplier engagement • 'Benchmark' contracts ensuring meet market requirements • Expand use of framework suppliers where appropriate |
|---|-----|------|---|

Risks are generally low with respect to dealing with incumbent contractors on framework contracts as non-delivery or failure to perform would be detrimental to other work and trigger non-performance or service level failure conditions which are well established.

There are also a small number of suppliers who have existing contracts being fulfilled with the council presently on similar projects to the CAZ. These suppliers are required to provide works or materials for the CAZ. These include: Chipside Ltd who provide back office server, system integration and PCN charging (ticket issuing and database) software for bus lane and parking enforcement, Videalert Ltd. who provide ANPR enforcement cameras and image processing and storage for bus lane enforcement and Pinacl Ltd. who provide a wireless communications network to the Council, which is currently undergoing expansion.

The new contract for Chipside Ltd and direct awards to Videalert Ltd and Pinacl Ltd also offer confidence to the Council as these companies offer proven technology and have been very effective providers. Chipside Ltd. and Videalert Ltd. have recently delivered systems which are connected to one another with similar if not identical technology to that required by the CAZ project, albeit on a smaller scale. This provides further reassurance that a quality, secure and effective system will be delivered to B&NES in a timely manner.

A full list of identified project risks can be found within FBC-23 'Quantified Risk Assessment' in Appendix M of this FBC. These risks are regularly reviewed whilst progress is monitored. The risks whilst reduced, remain applicable to either the Authority, the Contractor or alternatively would be shared between parties as highlighted in table 4-3 below.

Table 4-3: – Risk Allocation

| Risk | Authority | Contractor | Shared |
|-------------------------------|-------------------------------------|------------------|--------|
| Design | Achieving NO ₂ reduction | Achieving Output | ✓ |
| Legislative risks | | | ✓ |
| Construction risks | | | ✓ |
| Procurement is challenged | ✓ | | |
| Failure to deliver on time | | | ✓ |
| Supplier poor workmanship | | ✓ | |
| Contractor staff shortages | | ✓ | |
| Supply chain breaks down | | ✓ | |
| Supplier goes out of business | | ✓ | |
| Technology inadequate | ✓ | | |
| No supplier bids received | ✓ | | |

4.3.3 Contract Length

An indicative programme has been developed, as detailed in FBC-22 'Project Plan' in Appendix K of this FBC.

The implementation works begun in November 2019, with a 'trial site' being established to understand the delivery process and interaction between contractors. This helped the groundworks contractors to ascertain the likelihood of ground condition risks and allowed them to provide more detailed pricing for future works removing potential risk (and contingency cost). The establishment of the trial site went well, however the primary reason for embarking upon this exercise was to test the technology. Early indications suggest that the first site is working well and can be effectively scaled up for the remainder of the project. Preparatory works are now ongoing at a number of other sites, including Queen Square, and the scheme remains on schedule to become operational in late 2020.

4.3.4 Human Resource issues

The issue of TUPE has been considered during the development of scheme options but is not considered a significant risk due to the nature of contracts being awarded. Therefore, no relevant personnel/people management/trade union implications, including Transfer of Undertakings (Protection of Employment) Regulations 1981 (TUPE) have been identified for this project.

4.3.5 Social Value

The Social Value Act requires those who commission public services to consider how they can also secure wider social, economic and environmental benefits. Such Social Value benefits have been factored into the pre-procurement phase of project development, allowing the issues to be embedded into project design. Within the context of the current project, factors such as the potential social, environmental and economic impacts of the CAZ scheme have been appraised from the outset of business case development. Considerable consultation and engagement have also been undertaken throughout the process to ensure that opportunities for Social Value benefits from the project are maximised.

Due to the nature of the CAZ scheme, all three Social Value elements will benefit due to:

- Improving access for all across the main 'protected characteristic' equality groups;
- Health and environmental improvements from promoting active travel;
- Air pollution improvements from charging non-compliant LGVs and encouraging a reduction in engine idling via enforcement, amongst other measures. Low carbon alternatives are also promoted, such as public transport and electric vehicles.

4.3.6 Contract Management

Essential to the successful running of the contract are high-quality project management skills, complemented by specialist cost control expertise and sufficient support resources. These are required from the outset of tender development and evaluation, through project development and up to post-completion.

This team will be supplemented by a project governance structure more fully described in the Management Case, Section 6.

It is proposed that overall responsibility for managing CAP contracts in Bath would fall within B&NES Parking Services. The Head of Parking & Transport (working with the Project Manager) would take overall management responsibility for the CAP and establish appropriate contract management arrangements. Council officers responsible for B&NES's existing contracts used by the CAP, would assist in the delivery of relevant CAP measures.

The Councils Strategic Procurement team will also provide support to ensure the procurement processes are appropriate (i.e. provide value for money and are legally compliant).

As many of the contracts are already in place and the proposed suppliers are already working for B&NES, it puts B&NES in a strong position to successfully manage the implementation and ongoing operation of the CAP through existing contractual management arrangements.

5. Financial Case

5.1 Introduction

This section sets out the overall financial case for the Bath CAP's preferred option of a Class C CAZ with traffic management and has been updated for the FBC based on the revised boundary. It outlines the funding and expenditure requirements for the CAP, as well as outlining wider financial impacts and consequences of the proposed arrangement for B&NES and the Government. It outlines the revenue and capital needs (and associated profile) to deliver the project and is underpinned by a financial model which profiles the scale and sources of proposed funding alongside the timing of expenditure.

In summary, this section thus focuses on outlining:

- Capital and operational expenditure for the project;
- Funding sources for this expenditure and the funding that has been bid for to allow delivery and operations of the intervention and affordability of the scheme;
- Revenue generation estimates from the operation of a charging CAZ; and
- The net operational position of the project.

Further details of the project costs can be found in FBC-21 'Project Costs' in Appendix I of this FBC. Further details of the financial modelling can be found in FBC-33 'Financial Report' in Appendix W of this FBC

Note that all values listed below are in nominal terms.

5.2 Project Costs

5.2.1 Capital Expenditure (CAPEX) Summary

CAPEX costs are predominantly based on supplier quotations and actual prices, however the costs for some items remain estimates, as indicated in Table 4-1 in Section 4.3.

CAPEX will be incurred by B&NES across a range of activities as listed below:

- **Core Scheme – enforcement system and street works:**
 - Camera and communications network infrastructure (all required cabinets, mounting posts, new street lighting columns, ducting and cabling for camera installation as well as ducting, power supply, cabling and connection of the data communications network);
 - Road signing and minor realignment (kerbing alignments, traffic management required for installation, residents parking zones);
 - Queen Square traffic management scheme;
 - Supply, installation, configuration and testing of fixed ANPR cameras; a fully-equipped Mobile Enforcement Vehicle (MEV) and a back-office system;
 - Provision of a control room facility including fitting out of the premises, fixtures, fittings, furnishing and ancillary items;
 - Notice Processing System including server storage, including replacement after five years;
 - Complete system test and Site Acceptance Testing (SAT) integrating with existing systems;
 - Baseline and ongoing scheme monitoring, including traffic and air quality monitoring, active mode and economic indicator surveys and setting up of the local health study;
 - Installation of permanent Automatic Traffic Counters (ATCs) and a continuous air quality monitor at Queen Square; and
 - Provision of ANPR camera coverage in neighbouring authorities.

The CAPEX cost of the street works and enforcement system is a total of £6.38 million (nominal values).

- **Core scheme design and management:**

- Detailed design work of core scheme; and
- Delivery phase project management, infrastructure lead, community liaison lead and site coordinator role all at B&NES Grade 10.

The CAPEX cost for the core scheme design and management is a total of £0.897 million (nominal values).

- **Mitigation measures:**

- Bus upgrades (retrofits and repowering);
- Financial support schemes (including telematics devices);
- Delivery and Servicing Plans for Businesses;
- Car club expansion;
- Last mile delivery (cargo bike scheme); and
- City Freight pilot scheme.

The CAPEX cost for the mitigation measures is a total of £14.198 million (nominal values).

- **Quantified Risk Assessment (QRA)**

Risk has been calculated using Monte Carlo software with risks established for the implementation and delivery phases of the project. The QRA figure in line with WebTag guidance (P(Mean) is £2.798 million (nominal values) across both stages. Full details of the QRA are provided in FBC-23 'Quantified Risk Assessment' in Appendix M of this FBC.

A summary of the total capital costs incurred by the proposed scheme is provided in Table 5-1 below. The table demonstrates that capital costs amount to £24.3 million of capital funding, requested from JAQU via the Implementation Fund (£10.1 million) and the Clean Air Fund (£14.2 million). JAQU have already awarded £5.95 million of funding via the Implementation Fund to deliver components of the scheme related to implementing the Clean Air Zone and complementary traffic management measures at Queen Square. Additional Implementation Fund support is required to deliver additional camera (and supporting) infrastructure associated with a larger CAZ boundary and enhanced monitoring requirements. The residual Implementation Fund request is therefore £4.1 million and the total residual request to JAQU is £18.3 million for capital expenditure (including £14.4 million of CAF request).

A detailed breakdown of CAPEX costs is provided in FBC-21 'Project Costs' in Appendix I of this FBC. Table 5-1 provides a breakdown of the CAPEX by broad theme and sources of funding.

Table 5-1: CAPEX by broad theme and funding source (nominal values)

| CAPEX Item | Implementation Fund | Clean Air Fund | Total |
|--|---------------------|-------------------|-------------------|
| Core Scheme: Enforcement System and Street Works for CAZ | 6,377,783 | 0 | 6,377,783 |
| Core scheme design and management | 896,871 | 0 | 896,871 |
| Risk | 2,797,605 | 0 | 2,797,605 |
| Mitigation Measures | 0 | 14,198,428 | 14,198,428 |
| Total | 10,072,259 | 14,198,428 | 24,270,687 |
| Funding Already Secured from Implementation Fund | 5,950,000 | 0 | 5,950,000 |
| Residual Funding Required | 4,122,259 | 14,198,428 | 18,320,687 |

5.2.2 Operational Expenditure (OPEX) Summary

OPEX will be incurred by B&NES across a range of activities, throughout the operation life of the CAZ, these include:

- Operations and enforcement of the CAZ
- Maintenance of the CAZ and complementary infrastructure
- Data Communications
- Power
- CAZ project delivery and ongoing operational management
- Operation and maintenance of the Clean Air Fund mitigation measures
- Council overheads on staff costs
- Other costs (including additional PCN administration processes, ongoing monitoring and evaluation etc.)

The majority of these operational costs are accrued on a fixed, annual basis for the lifecycle of the project. However, cost items relating to PCN/Traffic Penalty Tribunal (TPT) activities are contingent on variations in vehicle non-compliance and contravention.

The core scheme OPEX costs, including all cost items, is £14.600 million across the appraisal period (nominal values) and the mitigation measures OPEX costs are an additional £2.461 million. A detailed breakdown of OPEX costs is provided in BoQ format in FBC-21 'Project Costs' in Appendix I of this FBC.

5.2.3 Funding Sources

There are five main funding sources for the set-up and operation of CAZ. These are:

- **An Early Measures Fund** - this is to support small, ambitious and good value early measures to improve air quality and start to reduce concentrations in the CAZ. A maximum of £3 million per local authority has been allocated for this funding which is part of the CAF;
- **A £255 million Implementation Fund** - this is designed to support local authorities in the planning and delivery of targeted action to improve air quality;
- **A £220 million CAF** - an opportunity for local authorities to implement additional measures tailored to their area which minimise the potential impact of local air quality plans - either by enabling the local authority to implement local plans that collectively impact on fewer people, or by providing direct support to those impacted; and
- **Revenue from CAZ charges** - funding will become available from the charges that are applied to each CAZ.

5.2.4 Funding Applications

B&NES is reliant on funding from all sources listed above to deliver this Clean Air Plan. These are described below:

- **Early Measures Fund (EMF)** – The grant funding requested from central Government through the EMF has been granted for £286,000. This has been used to provide a parking permit discount for residents and businesses who change their current vehicle for an Ultra-low Emission Vehicle (ULEV) vehicle.
- **Implementation Fund** – Based on current best estimates, the grant funding requested from central government through the Implementation Fund is £10.1 million for capital expenditure and £1.7 million for operational expenditure. This will cover operating costs associated with pre-implementation and the potential deficit associated with the running of CAZ related infrastructure in the first year of operation prior to revenue realisation. This is to safeguard against budgetary risk for B&NES in the event that the anticipated revenue stream from CAZ income does not materialise. This operational deficit is explicitly modelled within the financial analysis and therefore identified as a deficit that JAQU must underwrite through revenue cost grant funding.

Although the current financial modelling does not reveal any other operational deficits prior to 2027, B&NES assume that should any other operational deficits occur (e.g. for unforeseen reasons that could not be captured as part of the QRA), these will be fully underwritten by JAQU. By definition, the unforeseen impacts on CAZ operation cannot be quantified. As a result, no attempt has been made to formally incorporate or quantify this underwriting requirement as part of the financial analysis.

The sum of £5.95 million from the Implementation Fund has already been awarded to B&NES towards design and implementation of the charging zone.

- **Clean Air Fund** - The grant funding requested from central government through the Clean Air Fund is £14.4 million for capital expenditure and £2.0 million to cover operational costs. This provision will fund scheme components, which mitigate against any potential negative impacts of the Clean Air Plan on local residents and businesses.

5.3 Financial Model

5.3.1 Overview

Modelling of the finances for the Bath CAP has been undertaken to analyse the potential financial performance of the project. Full details of the financial model development and results are included in FBC-33 'Financial Report' in Appendix W of this FBC.

The Clean Air Zone Framework states that local authorities should not set the level of charge as a revenue raising measure and the Transport Act 2000 requires any excess revenue that may arise from charges above the costs of operation are to be re-invested to facilitate the achievement of local transport policies and these should aim to improve air quality and support the delivery ambitions of the zone.

The financial model is underpinned by key assumptions, as listed below:

- The preferred intervention option is a Class C CAZ with traffic management. This imposes CAZ charging on high emission buses, coaches, taxis, private hire vehicles, HGVs and LGVs. Private cars are unaffected;
- The operational phase begins in 2021 and is operational until the primary objectives of the Clean Air Plan are achieved (i.e. compliance with the air quality limit values and objectives). The model assumes that the Clean Air Plan remains in operation until 2030 to ensure steady-state rather than temporary compliance;
- The forecast number of non-compliant vehicles in 2021 is adopted from transport modelling outputs, with non-compliant vehicle forecasts for subsequent years based on interpolation also undertaken as part of transport modelling; and
- Administration costs associated with reviewing and processing foreign vehicles are included within the model. However, any revenue generation is excluded on the basis that it is difficult to charge, fine and/or pursue payment for foreign vehicles. It is assumed that all operational activities associated with foreign vehicle enforcement would be outsourced to third parties, who typically operate on a 'no-win no-fee' basis. Based on ANPR data, 1.55% of all vehicles in the CAZ area are foreign vehicles; any revenue relating to these vehicles is ignored within the model, even though processing charges are captured.

The overarching framework for revenue generation as a result of the CAZ is outlined in Figure 5-1.

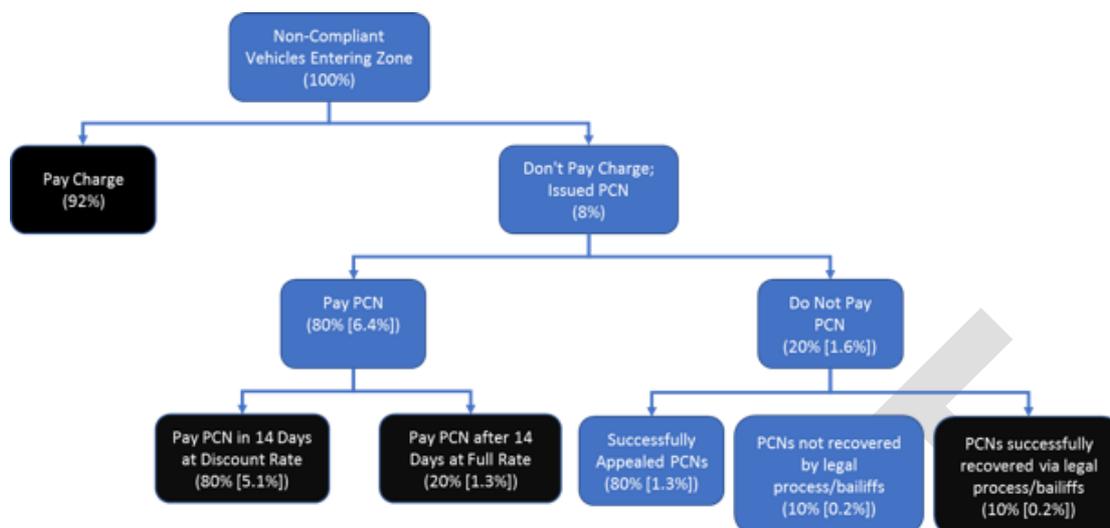


Figure 5-1: CAZ revenue generation framework

5.3.2 Revenue Generation

Table 5-2 summarises the anticipated income from the CAZ including direct CAZ income (from the charge) plus the indirect CAZ income (from the PCN process). Calculations suggest the CAZ could gross £5.2 million in Year 1, declining to £83,000 in 2030, an average of £2.4 million per annum.

It should be noted that the revenue generation is reliant on a number of key assumptions which are not certain. B&NES has made reasonable attempts to estimate these assumptions based on similar schemes delivered in the UK or experience of enforcement within the authority, but since a CAZ has not yet been implemented outside London the available evidence is limited and hence the forecasts are uncertain. In addition to the analysis above, a range of more detailed sensitivity tests have been undertaken to understand the impact of amending these assumptions on the forecast revenue generation and are presented later in this report in Section 5.3.4.

Table 5-2: CAZ revenue generation summary table

| Variable | Year of CAZ Operation | | | | | | | | | | Total | Annual Ave |
|------------------------------------|-----------------------|--------|--------|--------|--------|--------|--------|------|------|------|---------|------------|
| | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | | |
| No. Non-Compliant Trips (000s) | 213.2 | 193.6 | 173.9 | 139.9 | 109.6 | 75.1 | 49.0 | 26.9 | 13.2 | 4.9 | 999.2 | 99.9 |
| No. Paying CAZ Charge (000s) | 200.4 | 181.9 | 163.4 | 131.5 | 103.0 | 70.6 | 46.0 | 25.2 | 12.4 | 4.6 | 939.2 | 93.9 |
| No. Contravening CAZ Charge (000s) | 12.8 | 11.6 | 10.4 | 8.4 | 6.6 | 4.5 | 2.9 | 1.6 | 0.8 | 0.3 | 60.0 | 6.0 |
| A) CAZ Charge Income (£'000s) | £4,342 | £3,916 | £3,490 | £2,763 | £2,120 | £1,407 | £880 | £453 | £202 | £63 | £19,635 | £1,964 |
| No. Paying PCN (000s) | 10.2 | 9.3 | 8.4 | 6.7 | 5.3 | 3.6 | 2.4 | 1.3 | 0.6 | 0.2 | 48.0 | 4.8 |
| No. Paying After TPT (000's) | 0.3 | 0.2 | 0.2 | 0.2 | 0.1 | 0.1 | 0.1 | 0.0 | 0.0 | 0.0 | 1.2 | 0.1 |
| B) CAZ PCN Fine Income (£'000s) | £813 | £899 | £939 | £636 | £496 | £338 | £219 | £118 | £57 | £20 | £4,535 | £454 |
| A + B) Total CAZ Income (£'000s) | £5,155 | £4,815 | £4,429 | £3,399 | £2,616 | £1,744 | £1,099 | £571 | £259 | £83 | £24,170 | £2,417 |

5.3.3 Net Operational Position

Under the core scenario, the analysis indicates that cumulatively, revenue generation will be more than operational costs, resulting in a net operational surplus of £7.1 million across the appraisal period. Given that B&NES assume that £2.0 million of operating costs associated with the CAF mitigation measures will be funded by JAQU and paid upfront, the net operational surplus is effectively £9.1 million. However, the scheme will generate a net operational deficit in the pre-implementation phase (as no revenue is forecast to materialise prior to 2021), and in the later years of the appraisal period (as the number of non-compliant vehicles falls but scheme operations are maintained).

The analysis demonstrates that the CAZ revenue is sufficient to cover operational costs of the scheme. However, B&NES request that the following additional funding is provided to support the ongoing operation of the Clean Air Plan interventions:

- Revenue grant funding from the Implementation Fund to cover all operational costs preceding revenue generation that are essential to achieving compliance. There is an expectation that some operational costs will be incurred prior to revenue generation. As such, B&NES is requesting upfront financial support in the form of a grant from JAQU's Implementation Fund to cover all operating expenses prior to operation of the CAP (i.e. 2019 and 2020). Such support is required to fund recruitment, training and other overheads associated with CAZ enforcement, which will need to be in place prior to scheme opening (and therefore any revenue generation).

There is also a risk that the revenue generation does not materialise when the scheme is scheduled to commence due to legal challenge or other factors. This could lead to a scenario where an operational deficit could persist into 2021, as although the Clean Air Zone is up and running, no revenue is accruing. In line with the pessimistic set of revenue-generating conditions outlined above, current best estimates suggest that revenue generation could be delayed until July 2021. Under these circumstances, the CAP could incur significant operational costs with no form of revenue generated to offset this burden. As such, B&NES is requesting upfront financial support in the form of a grant from JAQU's Implementation Fund to cover the identified potential for operational deficit, which persists for the first six months of the operational period (i.e. up to July 2021). Based on current modelling, as soon as the CAZ returns an operational surplus (i.e. forecast for July 2021), no further Implementation Funding to cover operational funding will be requested²⁵.

This approach will soothe short-term cash flow issues prior to and immediately after scheme opening. It will also minimise the Council's financial burden and any risk associated with delays to receipt of revenue following implementation of the scheme.

- Further, and as noted above, a grant from the Clean Air Fund is anticipated to cover operating costs associated with measures proposed to mitigate the impact of the Clean Air Plan:
 - Last mile delivery cargo bike operation and maintenance
 - Various staff roles required to administer the CAF mitigation measures in 2020 and 2021, including:
 - Supporting measures team manager
 - Sustainable travel and transport team comprising:
 - Sustainable travel and transport team lead
 - Technical administration officers
 - Business engagement officers
 - Travel advisors
 - Bus retrofit lead

²⁵ That said, and in line with the position of B&NES' S151 Officer, other impacts that were not possible to incorporate into the financial analysis could occur which threaten the operational position of the CAP. In the event that these impacts are unforeseen and/or national scale risks that could not be accounted for within the QRA, but result in an operational deficit being incurred beyond June 2021, it is expected that any such deficit will be underwritten by JAQU and funded in the year that the impact is realised. Essentially, In the event that the Council incurs unidentified operating costs for the CAZ in excess of the income generated by the scheme, the Council is assuming that any resulting unidentified revenue deficit position will be underwritten by JAQU and funded in the year that the shortfall is realised

- Financial assistance scheme lead (whilst this post is retained until 2028, CAF grant support is only required to fund the first two years of the role)

In the absence of revenue grant funding to support the operational costs associated with these interventions, it will not be possible to ensure these interventions are retained over the entire period they are required. B&NES is unable to cover any shortfall due to the lack of certainty that the anticipated revenue will be realised. As such, these interventions will be removed from the Clean Air Plan in the absence of revenue grant funding (alongside initial capital grant funding to implement the interventions).

The resulting revenue grant funding request is estimated as follows:

- Implementation Fund: £1.7 million – to cover all operational expenditure pre-implementation (2019 and 2020) and the potential operational deficit recorded in the first six months of operation in 2021.
- Clean Air Fund: £2.0 million – to cover selected mitigation measures required to offset any potential adverse impacts of the scheme on local residents and businesses.

The above requests are based on current best estimates for the operational phase of the scheme. In the event that the Council incurs unidentified operating costs for the CAZ in excess of the income generated by the scheme in any given year, the Council is assuming that any resulting unidentified revenue deficit position will be underwritten by JAQU and funded in the year that the shortfall is realised. This does not affect the identified operational deficit forecast for 2027-30, which will be covered through the Sinking Fund (see below).

That said, based on current financial forecasts, where revenue grant funding is provided to cover the operational costs stated above, Table 5-3 demonstrates that the Clean Air Plan will be able to achieve a net operational surplus. This includes with the worst case scenario that assumes delay in revenue generation and other negative impacts on income (as per Section 5.3.4):

Table 5-3: Net Cash Flow Position (£'000s)

| Net Cash Flow Position (£'000s) | | | | | | | | | | | | | |
|---------------------------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|------|--------|--------|
| Operational Item | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | Total |
| Operational Income | 17 | 1,800 | 3,881 | 4,029 | 3,470 | 2,751 | 2,114 | 1,407 | 883 | 457 | 206 | 65 | 21,081 |
| Operating Revenue | 0 | 0 | 2,113 | 3,898 | 3,470 | 2,751 | 2,114 | 1,407 | 883 | 457 | 206 | 65 | 17,365 |
| CAF Revenue Grant | 0 | 930 | 928 | 131 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,989 |
| IF Revenue Grant | 17 | 870 | 840 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1,727 |
| OPEX | 17 | 1,800 | 2,711 | 2,002 | 1,683 | 1,651 | 1,418 | 1,036 | 1,034 | 1,036 | 974 | 1,370 | 16,733 |
| Net Operating Position | 0 | 0 | 1,170 | 2,027 | 1,787 | 1,100 | 696 | 370 | -151 | -579 | -769 | -1,305 | 4,348 |

With revenue grant funding in place, in line with the requirements outlined by the worst case scenario, the operational summary demonstrates that the Clean Air Plan is forecast to generate a positive cash flow over the appraisal period. Any cashflow surplus associated with the scheme will be ring-fenced for the following purposes, in order of priority:

- Creation of a Sinking Fund to safeguard ongoing and long-term operational expenditure, particularly in years 2027-2030 when the scheme is anticipated to face an operational deficit, as well as decommissioning cost. The Sinking Fund is designed to cover the operational deficit identified through the current financial modelling. In the event that additional operational deficits materialise or the forecast deficit between 2027-30 worsens

(e.g. due to unforeseen/unknown/national scale risks), the Council assumes that any resulting operational deficit position will be underwritten by JAQU. This would require funding in the year that the shortfall is realised. Effectively, the Sinking Fund is only intended to cover for identified and modelled operational deficit, not additional operational deficit that may occur;

- Creation of a Clean Air Revenue Re-Investment Reserve, in line with the Bath Clean Air Zone Charging Order 2019, where any residual revenue surplus will be used by B&NES to:
 - Support and extend the non-charging measures identified to supplement the Clean Air Plan;
 - Support programmes and policies both in Bath and the wider Council area that are aligned with the aspirations of the Clean Air Plan (i.e. wider air quality and transport priorities); and
 - Mitigate any negative impacts on the Councils budget that arises from the implementation of the CAZ.

Within this context, the residual cash position for the CAP in Bath is expected to be neutral throughout the appraisal period, as demonstrated in Table 5-4 below.

Table 5-4: Residual Cash Flow Position (£'000s)

| Operational Item | Net Cash Flow Position (£'000s) | | | | | | | | | | |
|---|---------------------------------|-------|-------|-------|------|------|------|------|------|--------|-------|
| | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | Total |
| Net Cashflow | 1,170 | 2,027 | 1,787 | 1,100 | 696 | 370 | -151 | -579 | -769 | -1,305 | 4,348 |
| Contribution to Sinking Fund to Cover Long-term Shortfall | 1,170 | 1,633 | 0 | 0 | 0 | 0 | -151 | -579 | -769 | -1,305 | 0 |
| Reinvestment Reserve (residual monies) | 0 | 394 | 1,787 | 1,100 | 696 | 370 | 0 | 0 | 0 | 0 | 4,348 |
| Residual Cash Position | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

5.3.4 Sensitivity Analysis

In line with JAQU guidance, a range of sensitivity analysis tests have been undertaken to determine the implications of variations to key assumptions, which underpin the CAPEX and OPEX summaries. The sensitivity tests that have been undertaken are outlined below.

The following key assumptions have been adjusted within the sensitivity analysis:

- Increase/decrease in CAPEX costs; and
- Changes to OPEX costs:
 - Alternative contravention rates
 - Delay in revenue generation, as a result of the operational phase of the project being delayed, either due to a legal challenge or other delaying issues
 - Outsourcing the administration and enforcement of the scheme
 - Alternative rates of successful PCN payments received
 - Alternative numbers of non-compliant vehicles travelling within the CAZ
 - A combination of impacts comprising alternative numbers of non-compliant vehicles travelling within the CAZ, alternative rates of successful PCN payments received and a delay in revenue generation. This represents the worst-case scenario for Bath CAP.

A switching values test was also undertaken to demonstrate the scale of cost or revenue change needed to reach a cost neutral position in the core scenario.

The sensitivity analysis demonstrated that the surplus revenue could fall within the range of £4 million and £12 million after creation of a Sinking Fund. Full details of the sensitivity test analysis are provided in FBC-33 'Financial Report' in Appendix W of this FBC.

5.4 Summary

The financial analysis for the preferred Clean Air Plan option, i.e. a Class C CAZ with traffic management, demonstrates that the capital cost of implementation will amount to more than £24.3 million. B&NES is requesting around £10.1 million from the Implementation Fund to support capital expenditure for the preferred option. They have already secured £5.95 million from this source, leaving a residual funding request of £4.1 million. B&NES is also requesting £14.2 million from the Clean Air Fund to support capital expenditure on mitigation measures. Hence, the total residual capital funding request to JAQU is £18.3 million.

From an operational perspective, the financial analysis demonstrates that CAZ revenue is sufficient to cover operational costs for the preferred Clean Air Plan option, under the core scenario. However, there will be a significant operational deficit in the years immediately before implementation and in the latter stages of the appraisal period. Further, there is an outstanding risk that the CAZ income revenue stream identified in the operational analysis may not materialise.

As a result, and because the CAZ revenue estimation is so uncertain (due to a lack of precedence and direct benchmarking for a similar scheme), B&NES is requesting that revenue grant funding is provided to cover operational costs for the pre-implementation phase. It would also be required to cover the potential operational deficit that could be incurred within the first six months post-implementation, based on the financial modelling. This is in addition to capital funding. The total revenue grant funding request is in the region of £1.7 million from the Implementation Fund to support the initial operational costs associated with scheme components that are essential to achieving compliance and to cover forecast operational deficit in 2021. Similarly, it is assumed that £2.0 million of funding will be forthcoming from the Clean Air Fund to support the ongoing operational costs. The funding would be used for essential scheme components, which mitigate against any potentially adverse impacts from the Clean Air Plan on local residents and businesses. The base operational funding request to JAQU is therefore £3.7 million.

Further, B&NES assume that any additional operational deficit that occurs (beyond that identified and mitigated against in the modelling [e.g. via the Sinking Fund covering 2027-30]) will be fully underwritten by JAQU. Effectively, in the event that operational deficit occurs over and above that identified, B&NES expect revenue funding support from JAQU. This position reflects the potential for unforeseen and national scale risk that could not be accurately included within the core financial modelling or risk analysis.

In summary, the total request to central government for the delivery and operation of B&NES' Clean Air Plan is around £22.0 million (exclusive of the £5.95 million has already been secured), split as follows:

- £18.3million in capital grant funding, of which:
 - £4.1 million from the Implementation Fund (exclusive of the £5.95 million funding already secured);
 - £14.2 million from the Clean Air Fund.
- £3.7 million in revenue grant funding, of which:
 - £1.7 million from the Implementation Fund, required to cover:
 - The initial operational costs (pre-implementation) for those scheme components required to achieve compliance; and,
 - The potential operational deficit that could materialise in the first six months of 2021 in the event that worst case scenario assumptions apply.
 - £2.0 million from the Clean Air Fund required to cover selected operational costs of scheme components required to mitigate against potential adverse impacts of the Clean Air Plan on local residents and businesses.

With revenue grant funding provided in line with the above conditions, the preferred option can achieve a net operational surplus of between circa £4m and circa £12m. It is assumed that any surplus can be used to support a Sinking Fund to mitigate against identified operational deficits, support complementary air quality and transport projects in B&NES, as well as mitigate against any unforeseen negative impacts on the Council's budget that may arise from implementation of the preferred option. That said, the surplus cannot be used to cover any unidentified revenue deficit associated with operation of the CAZ. B&NES assume that any such deficit will be fully underwritten by JAQU.

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6. Management Case

6.1 Introduction

The purpose of the management case is to provide JAQU with confidence that appropriate arrangements are in place to ensure successful delivery of the Bath CAP. In line with JAQU guidance, the management case builds on the OBC by making recommendations about the optimal solution to the following issues:

- The governance structure during the implementation and operational phases, including key management roles and responsibilities and a project organogram;
- Evaluation and monitoring processes and associated benefits realisation;
- Risk management and mitigation; and
- The provision of a realistic and achievable project plan.

6.2 Previous Experience and Lessons Learned

B&NES has a proven track record of delivering recent transport and environmental projects of a similar type and scale to the proposed CAP. This practical experience of delivering schemes of a similar size and nature means B&NES has a thorough understanding of the challenges, and associated solutions, that could materialise during the implementation and operation of the CAP. Examples include the Bath Transportation Package and Bus Lane and Parking Enforcement. A summary of some of the most pertinent projects follows, as well as some of the key lessons learned that could be applied to support delivery of the CAP.

6.2.1 Bath Transportation Package

The Bath Transportation Package²⁶ is a DfT-supported investment of £30 million, comprising a range of measures designed to meet the current and future transport infrastructure needs of Bath. The works include the implementation of a range of IT and intelligent transport systems, including VMS and a Real Time Information (RTI) system, along with associated street works and bus shelter improvements.

This ongoing work is being successfully implemented by B&NES officers who will be key members of the project team for the CAP.

6.2.2 Bus Lane Enforcement

In 2016, the Authority identified the strategic requirement to replace the existing and aging ANPR camera network, with modern and up to date technology, to maintain high-quality enforcement within the core historic centre of Bath and on priority arterial routes. Bath was one of the early adopters of the technology in 2009 and the installation has been successful in reducing the number of vehicles travelling in contravention of the restrictions, increasing public transport journeys and reducing cross city car journeys. The use of the technology results in approximately 30,000 PCNs being issued per annum.

The project replaced all of the existing cameras and relocated them, in accordance with the updated best practice guidelines issued by the TPT. The cross departmental working between third party suppliers and internal IT teams allowed improved data security and information governance in line with GDPR requirements.

Replacement of the cameras has improved the enforcement of the restrictions by upgrading the technology to high definition (HD) footage, with improved infra-red vehicle number plate capture and recording. The coverage of the capture areas on the highway by the new cameras is significantly improved compared to the previous equipment, increasing reliability and the ability to confirm and evidence the circumstances of the contravention, if raised as part of the statutory appeals processes laid out in legislation.

²⁶ http://www.bathnes.gov.uk/sites/default/files/btp_aims_and_objectives.pdf

Key lessons within the delivery of the project that apply to the implementation of the CAZ scheme include:

- The soft market testing and assessment of ANPR solutions;
- Assessment of appropriate ANPR locations to ensure best evidence capture;
- Implementation of IT solutions to ensure evidence flow from remote ANPR stations to enforcement software; and
- Management of a white list to exempt authorised vehicles.

6.2.3 Parking Enforcement and Management System Improvement Project

The introduction of new parking management software, including permits and pay by mobile solutions, provided an integrated enforcement, payment and permit management system that improved customer service and streamlined internal operations, allowing staff to efficiently use the additional functionality and capacity to increase performance.

This internally funded project involved working with internal departments and linking into the Council Tax database, LLPG dataset and related information. It also reduced the number of IT software applications and volume of storage space required by Parking Services, by combining the separate functions under one supplier to allow easier cross referencing of authorisations, permits, payments and enforcement actions.

This solution increased the level of direct customer self-service and provided additional benefits such as virtual parking permits, online evidence viewing and direct entry of appeals for PCN representations.

These applications, as well as delivering a financial saving in the region of £250,000 per annum when compared to the previous systems, have provided an accurate management information system that enables better decision making, with regard to staff deployment and process change.

In particular, the introduction of virtual parking permits has led to a new way for residents and businesses to purchase and process their permits and parking stays. This includes trade persons permits and a staff management scheme that records individual stays by department but does not charge the individual users.

Pay & Stay customers are also able to activate parking via their mobile phone. This has been recently enhanced in a UK first where residents are able to access a separate and reduced tariff set to visitors through the pay by mobile system, reducing the costs of parking for residents to enhance the Council's commitment to putting residents first.

6.3 Project Management

The project will continue to be managed in accordance with the PRINCE2 principles set out in the B&NES Corporate Project Management System, which have been tailored in the Project Handbook to suit the particular needs of this project environment.

A number of key roles have been identified for delivery of the project within the organogram in Appendix A and are set out below along with the responsibilities of each role.

Project Board – The Project Board meets monthly and is responsible for guiding and steering the direction of the project. The board consists of the relevant cabinet members and senior B&NES officers. The lead cabinet member chairs these meetings. The Project Board:

- Reviews and approves the Project Handbook;
- Reviews and approves the final issue Plans and associated resource allocation;
- Receives Highlight Reports from the Project Manager;

- Reviews and approves any issues, risks and additional requirements escalated by the Project Manager that have resulted, or may result, in major deviations from the agreed Plans;
- Communicates information about the project to other senior officers and members and liaise with the Project Manager regarding any feedback;
- Ensures that the objectives of the project are met;
- Ensures that the project is undertaken within the agreed scope; and
- On completion, reviews and approves the Project Close Out Report.

Senior Responsible Officer (SRO) – The SRO for the implementation and operational phases of the project is the Group Manager for Transport and Parking. The SRO has overall responsibility for ensuring the CAP meets its objective and delivers the projected benefits within the time and cost parameters set out in this FBC.

Internal Transport Steering Group – The Internal Transport Steering Group will meet quarterly and will oversee the utilisation of any net revenue held in the Revenue Reinvestment Reserve, as per the recommendations set out in the Financial Case, Section 5 and in accordance with the plans set out in the Charging Order, Annex 5. The board will consist of councillors, senior B&NES officers and members of business and other key interest groups and it will be responsible for reviewing and prioritising the proposed improvements and making recommendations to the Project or Transportation Programme Board (depending on the phase of the project) for approval.

Project Manager – The Project Manager is responsible for the day-to-day management of the project on behalf of the Project Board. The Project Manager:

- Maintains the Project Handbook;
- Obtains approval from the Project Board for the Project Handbook;
- Liaises with the Project Team regarding the draft issue Plans;
- Obtains approval for the final issue Plans from the Project Board;
- Chairs the Project Team meetings and attend sub-group meetings as and when required;
- Provides Highlight Reports to the Project Board summarising:
 - The work done and work planned against the agreed Plans; and
 - Any issues, risks or additional requirements that have resulted, or may result, in major deviations from the agreed Plans;
- Coordinates any feedback about the project received via the Project Team and Project Board from other senior officers, members and stakeholders;
- Ensures that the objectives of the project are met;
- Ensures that the project is undertaken within the agreed scope; and
- On completion, liaises with the Project Team and prepare the Project Close Out Report.

Project Team – The Project Team consists of B&NES officers from a range of services, including transport, public protection, highways, parking, economic development, planning and public health with support from technical consultants and officers in the Council's communications, procurement, accounts and legal teams as appropriate. The Project Team meets fortnightly and is responsible for liaising with contractors and delivering the work set out in this FBC. The Project Manager chairs these meetings. The Project Team:

- Reviews the draft issue Plans and assesses the impact on the Council's resources;
- Provides Progress Reports to the Project Manager summarising:
 - The work done and work planned against the agreed Project Plan;
 - Any issues, risks or additional requirements that have resulted, or may result, in deviations from the agreed Plans;

- Communicates information about the project to stakeholders as appropriate and liaise with the Project Manager regarding any feedback;
- Ensures that the objectives of the project are met;
- Ensures that the project is undertaken within the agreed scope; and
- On completion, inputs into the Project Close Out Report.

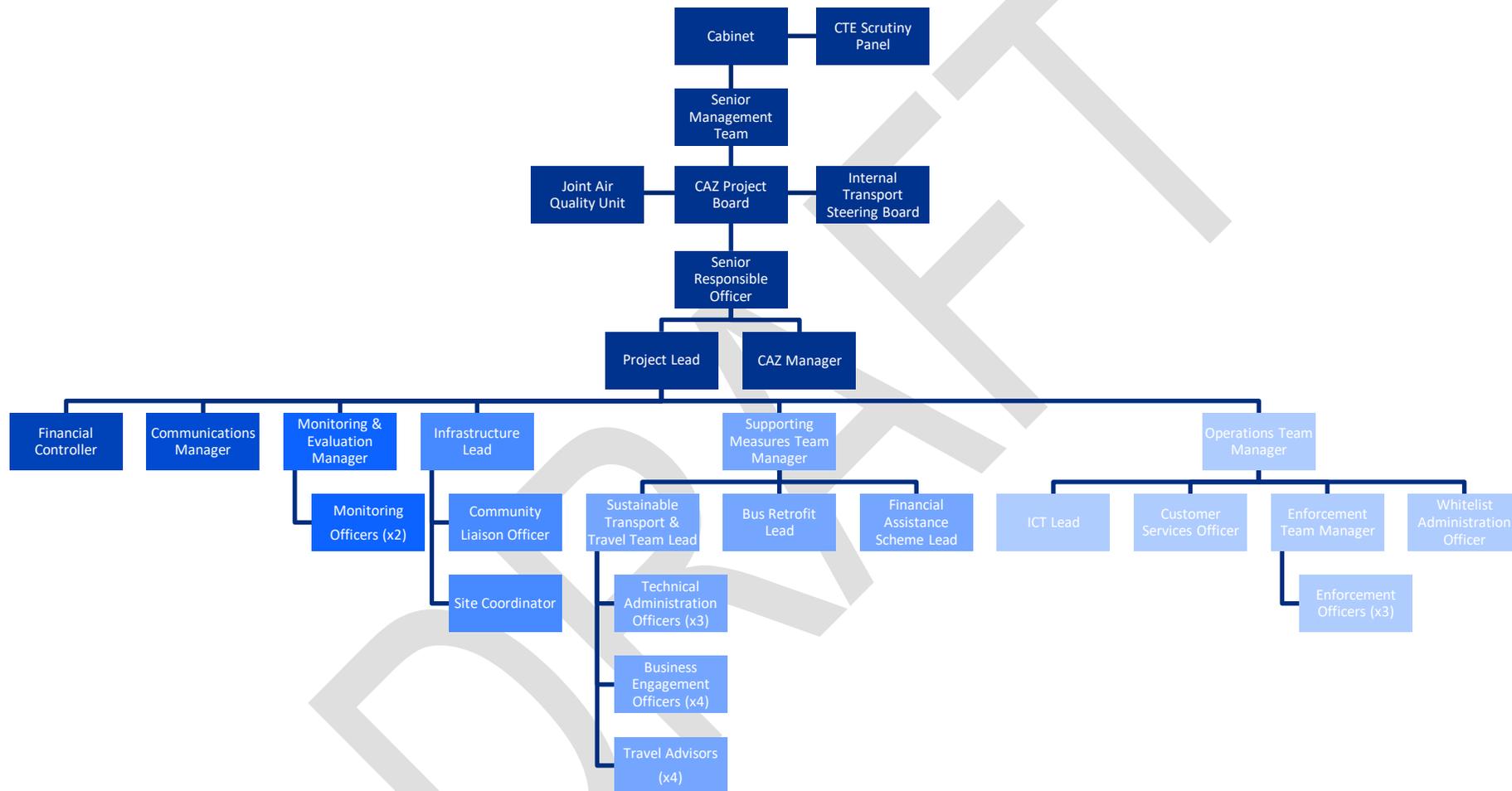
Specialist Advisors – Due to the large and complex nature of the project, specialist advisors have been and are being engaged where necessary to supplement the Project Team's capacity and skills. The scope of this is set out in the Task Orders and comprises:

- Marketing and communications specialists;
- Legal counsel
- Vehicle asset finance specialists; and
- Delivery and servicing planning specialists.

The Project Team is further organised into work package teams which meet on a weekly or daily basis as required. Sub-groups will also be formed as and when required to focus on particular areas, undertake specific tasks and/or address specific issues.

Oversight of the project is via regular reports to the Council's Transportation Programme Board, Senior Management Team, Cabinet and Climate Emergency and Sustainability Policy Development and Scrutiny Panel.

Figure 6-1 presents an organogram of the project team and governance structure.



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Figure 6-1: Project team and governance structure

As noted above, the project will be managed in accordance with the PRINCE2 principles set out in the B&NES Corporate Project Management System, which have been tailored in the Project Initiation Document to suit the particular needs of this project environment.

The Project Board will meet monthly. The Project Team will meet fortnightly and is responsible for delivering the work set out in the business case. The project reporting cycles will follow suit in order to inform these meetings.

In its meetings the Project Team will report on progress with the work identified in the Project Plan (both work done in the previous fortnight and work planned for the coming fortnight) and discuss any issues, risks or additional requirements that have resulted, or may result, in deviations from the agreed Plan. The Project Manager will chair this meeting.

As an output from the Project Team meetings the Project Manager will then produce a Highlight Report for the monthly Project Board meetings. The SRO will chair these meetings.

6.4 Financial Management

6.4.1 Financial Reporting

Regular financial reporting will be critical to ensure that the SRO, Project Board and Project Team are able to track progress against the timescales and budgets set out in the Project Plan and Financial Case. The Project Manager, in liaison with the Financial Controller, will be responsible for undertaking regular financial reporting to inform the Project Board of the project's progress and performance via monthly Highlight Reports.

Scrutiny and oversight of the project's financial management will continue to be provided by the Council's Accounts Team.

6.4.2 Change Control

6.4.2.1 Procedure to move funds or alter delivery timescales within a Work Package

Change is likely to occur during the implementation of the scheme and there may be a need to move funds between tasks in a Work Package or to amend the start or finish date of a particular task.

All requests to move funds and/or alter delivery timescales will be submitted to the Project Manager via a Change Request and reported to the Project Board via the Change Request Log.

A scheme of delegation will apply to requests for additional time or funds. The authorisation levels are set out below. Change requests exceeding the Project Manager's threshold will be accompanied by an Exception Report.

Table 6-2: Authority Levels to move funds or alter delivery timescales within a Work Package

| Authority Level | Threshold |
|----------------------------|--|
| Work Package Manager | Authorised to move a maximum of 10% between individual tasks within a work package up to an absolute value of £50,000 Authorised to change the start or finish date of any one individual task by up to two weeks |
| Project Manager | Authorised to move a maximum of 20% between individual tasks within a work package up to an absolute value of £75,000 Authorised to change the start or finish date of any one individual task by up to one month |
| Senior Responsible Officer | Authorised to move a maximum of 30% between individual tasks within a work package up to an absolute value of £100,000 Authorised to change the start or finish date of any one individual task by up to two months |
| Project Board | Authorised to move a maximum of 40% between individual tasks within a work package up to an absolute value of £250,000 Authorised to change the start or finish date of any one individual task by up to three months |

| Authority Level | Threshold |
|------------------------|--|
| Senior Management Team | Authorised to move a maximum of 50% between individual tasks within a work package up to an absolute value of £500,000 Authorised to change the start or finish date of any one individual task by up to six months |

Section 6.4.2.5 describes the process to be followed when the highest change control level is breached.

6.4.2.2 Procedure to move funds within the Change Budget

The Change Budget will comprise funds to underwrite:

- Implementation phase QRA risks
- Operational phase QRA risks

There will be no call on the operational phase risk allocation during the implementation phase. Any surplus risk allocation from the implementation phase will be carried forward to the operational phase. Any surplus risk allocation from the operational phase will be carried forward to the revenue reinvestment reserve.

All requests to move funds will be accompanied by a Change Request and Exception Report, recorded on the Change Request Log and submitted to the Project Board and then the Senior Management Team for authorisation.

The QRA only accounts for risks that can be reasonably foreseen and quantified at this stage in the project. The Council is assuming that any unforeseen and/or national scale risks arising that are not accounted for within the QRA and impact on the capital or operating cost of the scheme will be underwritten by JAQU and funded in the year that the impact is realised.

6.4.2.3 Procedure to move funds from the Change Budget to a Work Package

From time to time there may be a need to move funds from the Change Budget to a Work Package.

All requests to move funds will be submitted to the Project Manager via a Change Request and reported to the Project Board via the Change Request Log.

A scheme of delegation will apply. The authorisation levels are set out below. Change requests exceeding the Project Manager threshold will be accompanied by an Exception Report.

Table 6-2: Authority Levels to move funds from the Change Budget to a Work Package

| Authority Level | Threshold |
|----------------------------|---|
| Project Manager | Authorised to approve up to £75,000 in aggregate in each 12-month period |
| Senior Responsible Officer | Authorised to approve up to £100,000 in aggregate in each 12-month period |
| Project Board | Authorised to approve up to £250,000 in aggregate in each 12-month period |
| Senior Management Team | Authorised to approve up to £500,000 in aggregate in each 12-month period |

Section 6.4.2.5 describes the process to be followed when the highest change control level is breached.

6.4.2.4 Procedure to move funds between Work Packages

During the implementation of the scheme there may be a need to transfer funds between work packages. Any surplus funds held within a Work Package will first be transferred to the Change Budget prior to reallocation elsewhere. There will be no direct movement of funds between Work Packages.

All requests to move surplus funds will be accompanied by a Change Request, recorded on the Change Request Log and submitted to the Project Board for authorisation.

6.4.2.5 Procedure to change the scope of a Task Order

It is recognised that during the implementation of the project the scope of some Task Orders may change. This is particularly relevant to task orders which are still undergoing design development.

The overarching principle of the project is that the scope will not deviate significantly from that set out in the Task Orders. Any significant changes from those set out in the Task Orders are likely to have impacts on the business case and predicted outcomes.

Task Order scope changes will be classified as 'minor' and 'major'. The definition of a 'major' changes is set out below. Any other scope changes will be classed as minor.

Requests to make a minor scope change will be accompanied by a Change Request and Exception Report, recorded on the Change Request Log and submitted to the Project Board for authorisation.

The Project Board and Senior Management Team recognise the requirement to consult JAQU on any significant change to the scope of the project.

Requests to make a major scope change will be accompanied by a Change Request and Exception Report and recorded on the Change Request Log. If the change is likely to result in a significant change to the scope of the project the SRO will consult with JAQU with a view to obtaining their authorisation prior to submitting the change request to the Project Board and then the Senior Management Team for authorisation.

For the purpose of this project the definition of a major change is:

- A request to move funds or alter the delivery timescales within a Work Package that exceeds the Senior Management Team authorisation threshold;
- A request to move funds from the Change Budget to a Work Package that exceeds the Senior Management Team authorisation threshold; or
- A request to stop or remove a Task Order or add a new Task Order.

6.5 Project Plan

A Project Plan, included in FBC-22 'Project Plan' in Appendix K of this FBC, has been developed for delivery of the CAP, setting out the main project stages and their anticipated timescales.

A summary of the anticipated completion dates for each key activity is shown in Table 6-3.

Table 6-3: Key activity completion dates

| Activity | Completion Date |
|---|-----------------|
| Full business case completion | 13/12/2019 |
| Design and procurement | |
| ANPR camera design and procurement | 10/10/2019 |
| Communications network design and procurement | 09/10/2019 |
| Signage design and procurement | 06/01/2020 |
| Back-office system design and procurement | 14/11/2019 |
| Queen Square Traffic Management scheme design and procurement | 21/01/2020 |
| Scheme Implementation | |

| | |
|--|-------------------|
| ANPR camera implementation | 30/07/2020 |
| Communications network implementation | 15/06/2020 |
| Signage installation | 19/06/2020 |
| Back office system implementation | 23/07/2020 |
| Queen Square Traffic Management implementation | 24/04/2020 |
| System integration testing, monitoring and handover | 30/09/2020 |
| CAZ operation ready to commence | 02/11/2020 |
| Clean Air Fund mitigation measures | |
| Clean Air Fund application | 04/12/2019 |
| Bus retrofits completion | 01/10/2020 |
| Financial assistance schemes – ready to operate | 20/02/2020 |
| Travel advisors and supporting measures team – ready to operate | 16/01/2020 |
| Alternative delivery and servicing options for businesses – ready to operate | 22/05/2020 |

The implementation phase is expected to commence in November 2019 and continue until November 2020, when the Project Plan becomes fully operational.

The constraints around achieving the timescales set out have been considered, with appropriate action taken to ensure that they do not impinge upon the operational date. This is summarised as follows:

- The Project Plan considers confirmed network constraints, including Christmas embargos.
- Early and ongoing liaison with internal B&NES Council teams is in place to ensure that works are coordinated with other schemes planned around the city.
- Contractors are already engaged in the works planning process to ensure that they can meet the required timescales and the various workstreams are coordinated.
- Communications and liaison strategies are in place to ensure stakeholder and public liaison in relation to the works is comprehensive and timely.
- Involvement of other third parties, for example Highways England, is also currently being managed but not considered to be on a critical path.

6.6 Assurance Framework

In line with PRINCE2, quality assurance of both process and outcome will be undertaken throughout the programme.

Up to and including the FBC, the quality assurance process has been supported by the following JAQU review panels from JAQU:

- the Technical Independent Review Panel (T-IRP) responsible for technical assurance; and
- The Delivery Independent Review Panel (D-IRP) responsible for project delivery assurance.

JAQU have also now formed a Central Evaluation Team responsible for monitoring and evaluating the progress made towards meeting the air quality objectives set out in the CAP.

At the implementation and operational stage, it is envisaged that the Project and Transportation Programme Board (depending on the phase of the project) will delegate Quality Assurance to a nominated representative from the Board. A Peer Review Group will also be established to support Quality Assurance. All Project Board members will be given the opportunity to provide staff for this group.

The Peer Review Group will be convened at the discretion of the Project Board member with quality assurance responsibilities. The purpose of the group is to provide an internal 'challenge' role to support the Project Board. The group will not undertake any audits or reviews at this level but rather raise formal issues to the nominated Project Board member if concerns are identified. It is envisaged that the Peer Review Group will initially be convened immediately following procurement and then at appropriate points through the implementation and operational stage.

6.7 Communication and Stakeholder Management

6.7.1 Communication with Media

The Communications Office will be the primary point of contact for any contact with the media and will in the first instance consult with the Project Manager or SRO about how best to handle the enquiry.

6.7.2 Engagement

A robust engagement plan has been developed to achieve efficient and effective internal and external communications. The Stakeholder Management and Engagement Plan is provided in FBC-07 'Stakeholder Management and Engagement Plan' in Appendix B of this FBC.

6.7.3 Communications/Engagement Strategy Summary

B&NES recognises the value of engaging stakeholders and the public on the CAP. The Engagement Strategy to date has therefore been underpinned by two main objectives:

- To seek feedback at key stages to help shape the CAP; and
- To raise the profile of air quality issues and the CAP.

The communications and engagement strategy has been updated during every phase of engagement, SOC, OBC and FBC phase. The engagement phases remaining are:

- **Implementation** – at this stage, engagement with stakeholders and the public will split into two workstreams:
 - Engagement associated with installing the charging and traffic management infrastructure, led by the community liaison team.
 - Engagement on the supporting measures, led by the travel advice team.
- **Operation** – this phase will involve continued conversations with interested parties, led by the travel advice team.

The opportunity for the public and stakeholders to influence the process will be more limited through the next phase of the project. Implementation and Operation Phases will focus on:

- The timescale for implementation; and
- The practical measures people need to take to prepare for the introduction of the CAZ.

There will also be a need to raise awareness of CAZ infrastructure placement and construction start dates for those directly impacted, such as those people living or working adjacent to cameras and signs. A key theme that will continue to run through all remaining engagement will be health messages.

FBC-07 'Stakeholder Management and Engagement Plan' details some key groups, identified as particularly affected. These groups are key audiences for future communication and engagement due to their potential to be

impacted most by the CAP. However, the importance of communicating widely to ensure that everyone has awareness of the proposals is noted.

FBC-07 'Stakeholder Management and Engagement Plan' details the communication and engagement tools that have been employed throughout the SOC, OBC and FBC stages and those that will continue through to implementation and operation. The communication tools centre around a bespoke website, www.bathnes.gov.uk/bath-breathes-2021, with associated social media, newsletter and advertisement campaigns to draw in as wide a selection of the population as possible. These tools will be supplemented by face to face events as appropriate. FBC-07 'Stakeholder Management and Engagement Plan' further details the engagement and communications plan for the Implementation and operation phases.

6.8 Risk Management Strategy

A risk management strategy for the CAP is underpinned by the QRA, considered in detail in FBC-23 'Risk Management Strategy – Quantified Risk Assessment' in Appendix M of this FBC. The main purpose of the QRA is to support the costings as presented within the financial case, by predicting the level of risk contribution, with a defined level of confidence, to cover the implementation/operation of the scheme. QRA allows for uncertainty in unplanned additional cost items, including cost due to delay, that cannot be otherwise included in the project costs. The assessed risk value has been used in the financial case and incorporated in the economic appraisal.

The QRA process involves four steps:

- **Step 1** - identification of all of the risks affecting the project through risk workshops and risk reviews. This step results in a risk register.
- **Step 2** - analysis of the identified risks by defining their distributions in terms of probabilities, impacts and knock-on effects. This information is also gathered through risk workshops and other interactions including with stakeholders.
- **Step 3** - undertaking the risk modelling using Monte Carlo simulation (for this project @Risk® software was used).
- **Step 4** - analysing the results against required contingency needs for the project.

The QRA figure included in this FBC, in line with WebTAG guidance is the P(Mean), the mean percentile value. In addition, the 50th Percentile (P(50)) and 80th Percentile (P(80)) also provide further levels of confidence. The QRA results are shown below.

Table 6-4: QRA Results (November 2019)

| | P(50) | P(80) | P(Mean) |
|---|-----------------|-----------------|-----------------|
| Grand Total Risk (Financial + Delay) | £2,529 k | £3,471 k | £2,703 k |

The top 10 risks by Grand Total Risk (i.e. Financial + Delay) identified by the sensitivity testing are listed below.

Table 6-5: Top Ten Risks

| Rank | Risk Ref | Description |
|------|----------|--|
| 1 | Risk 016 | Successful challenges to the process for making the Order |
| 2 | Risk 025 | Scheme is not sufficient to achieve air quality compliance by 2021 as anticipated |
| 3 | Risk 008 | HE or other LA approvals for the signage on the SRN take longer than anticipated |
| 4 | Risk 020 | The signage installation takes longer than anticipated due to competing priorities for contractors |
| 5 | Risk 001 | Reliance on the industry's understanding/ability to deliver retrofit solutions for buses/coaches |
| 6 | Risk 019 | The ANPR camera installation takes longer, or costs more, than anticipated due to competing priorities for contractors |

| | | |
|----|----------|--|
| 7 | Risk 022 | Installation delayed due to clashes with other highway works, or requirement to integrate with other large works and major schemes |
| 8 | Risk 010 | Queen Square Traffic Management design takes longer, or costs more, than anticipated due to changing scheme requirements |
| 9 | Risk 018 | Delays in obtaining JAQU funding from the Clean Air Fund |
| 10 | Risk 004 | Delays in obtaining JAQU approvals for the FBC (for example due to a General Election) |

The QRA only accounts for risks that can be reasonably foreseen and quantified at this stage in the project. Section 6.4.2.2 describes how unforeseen and/or national scale risks will be dealt with.

6.9 Monitoring and Evaluation Plan and Benefits Realisation Strategy

It is recognised that Evaluation and Monitoring both during delivery of the CAP and post-completion will be vital to assess the benefits realisation of the programme. As such, and in line with PRINCE2 principles, the implementation and operational phases of the project will be subject to a Monitoring and Evaluation Plan and Benefits Realisation Strategy. FBC-26 'Evaluation, Monitoring and Benefits Realisation Plan' in Appendix R of this FBC sets out the detailed approach to these issues, covering the monitoring of impacts and the approach to determining the projected benefits, impacts and objectives.

In order to undertake the required monitoring, existing traffic and air quality monitoring infrastructure will be supplemented to provide a comprehensive network across the CAZ and beyond to monitor the impacts of the scheme. Further health, economic, walking and cycling and mitigation scheme impact monitoring is also proposed. Baseline surveys will be undertaken prior to scheme commencement. Corrective action planning has been considered along with the overall approach to scheme completion.

The evaluation element of the Plan covers quantitative and qualitative measures, thereby covering a range of outcomes and impacts. Furthermore, the evaluation strategy will help influence similar schemes. It will comprise both 'process evaluation' and 'impact evaluation', with the former focusing on the processes by which the scheme was undertaken and the latter focusing on whether the desired impacts of the scheme were realised.

Table 6-6 shows the mapping of the Desired Impact and Outcome Analysis of the plan.

Table 6-6: Monitoring outputs for assessing desired impacts (showing primary links only)

| Desired Impacts (D) by Monitoring Outputs (M) | M1: Air quality data | M2: Vehicular fleet information | M3: Traffic Flows | M4: Retail/business /office space vacancy figures | M5: Retail footfall surveys | M6: Park and Ride passengers data | M7: Walking and cycling counts | M8: Bus usage data | M9: Stakeholder Feedback from Council User Group Forums | M10: Taxi fares and unmet demand | M11: Early Measures Fund – ULEV Parking Permits | M12: Bus retrofit /compliance data | M13: Financial support scheme uptake | M14: Travel Advisor session uptake | M15: Anti-idling enforcement | M16: Weight restriction enforcement | M17: Delivery and servicing plans uptake |
|---|----------------------|---------------------------------|-------------------|---|-----------------------------|-----------------------------------|--------------------------------|--------------------|---|----------------------------------|---|------------------------------------|--------------------------------------|------------------------------------|------------------------------|-------------------------------------|--|
| Implementation Fund Scheme: | | | | | | | | | | | | | | | | | |
| D1: Deliver compliance with NO ₂ air quality Limit Values | | | | | | | | | | | | | | | | | |
| D2: Deliver compliance with NO ₂ air quality Air Quality Objectives | | | | | | | | | | | | | | | | | |
| D3: To minimise the impact to residents, particularly low income groups | | | | | | | | | | | | | | | | | |
| Clean Air Fund Scheme: | | | | | | | | | | | | | | | | | |
| D4: To minimise the impact to businesses | | | | | | | | | | | | | | | | | |
| D5: To minimise adverse traffic impacts | | | | | | | | | | | | | | | | | |
| D6: Contribute to the delivery of the 'Getting Around Bath' Transport Strategy. | | | | | | | | | | | | | | | | | |

Appendix A. Scheme Documents and Related Documentation to Systems Set Up

Appendix B. Stakeholder Management and Engagement Plan

Appendix C. Options Assessment Report

Appendix D. Air Quality Reports

Appendix E. Transport Modelling Reports

Appendix F. E1: Economics Appraisal Methodology Report

Appendix G. Distributional and Equalities Impact Analysis

Appendix H. Clean Air Plan Procurement Strategy

Appendix I. Explanatory Note on CAZ System Cost Estimates

Appendix J. Draft Charging Order

Appendix K. Bath CAP Infrastructure Work Programme

Appendix L. Stated Preference Survey Report

Appendix M. Quantified Risk Assessment

Appendix N. Sensitivity Testing Technical Note

Appendix O. Engagement Summary Report

Appendix P. Environmental Assessment

Appendix Q. Consultation Report

Appendix R. Evaluation, Monitoring and Benefits Realisation Plan

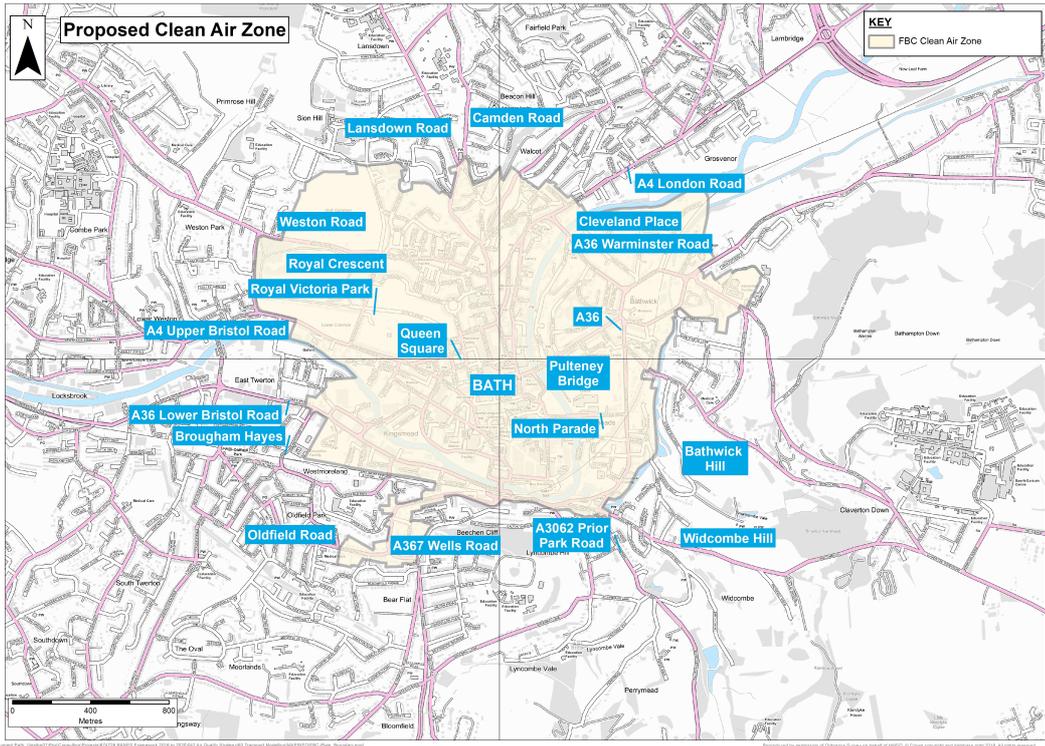
Appendix U. Letter from S151 Officer

Appendix V. Memorandum of Understanding for Emergency Service Vehicles

Appendix W. Financial Report

Appendix Y. Clean Air Fund Report

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Clean Air Zone

Communication Strategy

Implementation phase: Nov 2019 to Nov 2020

Summary

CAZ communications and marketing in the year before launch will focus on ensuring everyone affected by the CAZ knows the basics on Bath's Clean Air Zone and where to find support. If charges apply, drivers will be able to talk to an advisor about the support available, including financial assistance.

This will be achieved by a general awareness / 'countdown' campaign across print, press and digital and on supporting both our travel advisors and community liaison team with the publicity and collateral they require to talk to people directly.

As we near switch on, good news and key milestones will be highlighted, particularly around the number of vehicles upgraded as a result of financial support, and the improvements in air quality already made.

Increasingly, the CAZ will be promoted as one of the first steps towards more ambitious sustainable transport and travel policies that will contribute towards tackling the climate emergency and a better environment for everyone in B&NES.

Drop-in events and talking directly to residents and businesses has proved a very effective tool and will continue to be central to our strategy with a 'we're here to help' strapline promoted on video, radio and printed collateral.

Desired outcomes

- Residents, businesses and stakeholders understand the health impacts of NO₂, and why a CAZ is needed
- Residents and businesses in B&NES and neighbouring authorities know the zone's start date and whether they face charges
- All businesses in B&NES have been contacted by ourselves to gather detail on their fleets and be given information and help to access the support package
- Support packages have been vigorously promoted among local businesses and those in neighbouring authorities regularly travelling into Bath
- Residents and local businesses have easy access to information and support about street works
- Complaints and queries are well managed and monitored – improvements are made as a result
- Data on fleets is collected, stored and used to track vehicle upgrades and changes in travel behaviour as a result of the travel advisors' work
- Residents and local businesses are regularly informed of this progress and of good news stories and achievements – including improvements in air quality

- Residents and businesses have regular opportunities to meet and talk with the team
- Drivers of non-compliant vehicles and businesses know how and when to pay and where to find out about payment, enforcement and refund policies (2nd phase, 12 weeks prior to launch)
- We have gathered and are promoting statistics to show improvements in fleets across Bath as a result of our work
- Some wider work on engaging everyone on making conscious choices on sustainable travel and transport is started before the CAZ is launched
- Residents understand that the CAZ is one of a number of things that the council is doing to tackle the climate emergency.

How we'll achieve this

Building on the work done during the development of the business case, we've extended our engagement channels to include a community liaison team and sustainable travel and transport team offering face-to-face support to those affected by the CAZ, .

Publicity and press will be planned and created for:

- **A general campaign** – press and publicity to raise awareness to a wide audience, such as a 'countdown' campaign. This will include supporting the **national campaign**. Themes to be developed
- **The sustainable travel and transport advice team** – to support businesses and individuals affected by charges to access our support package from January 2020
- **The community liaison team** – to support residents affected by the CAZ e.g. street works prior to the launch from January 2020.
- **The project team** – to support engagement with registered taxis/PHVs, scheduled bus companies and local coach operators (already well underway) and other adhoc, general support

General campaign

Target: wide audience of residents, businesses and stakeholders in B&NES and neighbouring authorities

We'll continue to promote awareness of the CAZ and what it might mean for people with a planned 'countdown' campaign, working closely with communications teams in neighbouring authorities. There will be a particular focus on the 6 weeks prior to launch.

Focus/Key messages:

The messages are less specific than for our targeted business audience and will feature a 'countdown' theme where appropriate and possible.

- The CAZ means cleaner air for all across the whole of Bath

- Private cars will not be charged
- Zone boundary (maps)
- How to find out if your vehicle is compliant/access support
- What vehicles will be charged/reminders that private cars will not be charged
- Good news stories/milestones reached
- Infrastructure progress with a focus on minimising disruption and the work of our community liaison officer/localised information programme
- Promotion of the anti-idling and weight restriction enforcement programmes (we may treat these separately)
- The CAZ is just the start of a much wider programme to improve our environment and tackle the climate emergency. Links to be developed
- We're here to help – come and talk to us

Plus in phase 2 (12 weeks prior to launch):

- CAZ basics for switch on: how and when to pay and enforcement details
- Good news: summarise all that we've achieved and better air for Bath
- X weeks to go – Have you checked your vehicle?

Channels/collateral (to be confirmed):

Social media

- Social media campaign will be outsourced and developed for the 'countdown' campaign FB, Twitter and Insta advertisements and council posts. Themes and timing tbc.
- Share national posts (see below)

Video – for web and social

- Early Video 1: the basics outlining who pays, how it will work, where it is, when it starts and what support is available - for website and social media (Now)
- Video 2 – how to check your vehicle and pay the charge (Prior to launch)
- Video 3 – short success video with infographics on how air quality is already improved (on launch)

Print/Web/General Info

- An updated 'all you need to know' brochure (available via PDF online/some print for travel advisors)
- Direct mail: final postcard sent to all homes OR/AND targeted letter to non-compliant vehicle drivers after soft launch of cameras (but before launch) – arranged through DVLA
- Quarterly newsletter to subscribers – email (Mailchimp)
- Supporting photography and visuals for print, social and web
- Infographic with statistics to promote good news visually – for social and web

Press

- Regular press to main local papers featuring key milestones, decisions and good news stories – tailored for neighbouring local authorities where appropriate
- National press – see below.

Radio

- Radio advertising in bursts from 6 months, *to be confirmed once JAQU confirm their radio advertising focus for the south west*. Increasing in last 6 weeks: e.g. Local Breeze, Sam, Heart, Kiss, Jack FM
- National radio campaign (see below)

Outdoor

- Temporary covers on CAZ signage (12 weeks prior to launch)
- Regular drop-in events
- National billboard campaign (see below)

See month-by-month plan for more detail.

Supporting the national campaign

JAQU are developing a national campaign to promote awareness of charging CAZs.

This will include a national awareness campaign focused nationally but also tailored for local audiences (in Bath and also for the South West – Bristol, Bath, Swindon). Their plan covers radio, display, social and outdoor advertising.

Their messaging will drive people to the online vehicle checker and later to their central payment system, developed by JAQU to find out where and what they'll be charged in each CCAZ across England. It will not cater for local exemptions and concessions. Their site will feature a web link to Bath's pages.

What we'll do

- Contribute to the national campaign with information and ideas from November 2019
- Use the government's campaign 'top line' creatives and messaging and localise them to ensure a seamless 'brand' for CAZ. The following straplines are being used with short form and long-form messages that we can localise.
 - Cleaner air ahead (using CAZ sign)
 - Healthier air is on the horizon
 - Clean Air Zones are coming / A Clean Air Zone is coming
- Avoid duplicating effort where it might become confusing, such as radio, outdoor billboard and social. Careful planning is required with JAQU.
- Ensure a seamless web journey for a customer going to JAQU and then onto Bath's site.
- Share the final creatives with the project board when it's available

How we mould our campaign around JAQUs will be confirmed following confirmation of plans from central government after the election.

Target: wide, general audience in B&NES and neighbouring authorities

Supporting the travel and transport team (lead generation and content)

A travel advice team will be in place from January 2020. Telemarketers will aim to call around 6.5K businesses to gather some basic information on how a CAZ might affect them and, accordingly, offer tailored help and advice.

This includes promoting the financial assistance scheme (FAS) where applicable, the use of telematics devices on vehicles (to confirm eligibility for the FAS), advising on concessions/exemptions, and encouraging more sustainable transport and delivery plans.

Communications will provide the collateral required by the team to efficiently carry out their role, with a focus on generating leads.

Target audience:

Businesses, particularly SMEs and sole traders, organisations with larger fleets, public sector organisations, schools and charities in B&NES and those located in neighbouring authorities but regularly visiting Bath.

Taxis/PHVs, scheduled bus fleets, and local coach companies are already being contacted regularly about the CAZ by the project team and require less focus. See Project Team section.

Channels and collateral required:

There may be some overlap with the general countdown campaign tbc.

- Direct calls made by the sustainable travel and transport team
- A5, 4 page, colour leaflet outlining the support package with a call to register interest online
- Distribution of leaflets at local trade counters and merchants
- Radio advertising (from February/March 2020) focusing on generating leads for the financial assistance scheme.
- Dedicated web pages with 'expression of interest forms' for generating leads
- Press releases inviting businesses to register their interest/talk to an advisor
- Press releases calling for people to apply for concessions/exemptions
- Share press and collateral with neighbouring authorities communication teams
- Social media campaign focusing on generating leads for the financial assistance scheme (this could tie in with the early countdown campaign)
- Promotion of regular drop in events (as per general campaign)
- Advertising, promotions or articles in local niche business press e.g. Business Exchange, Bath Life etc.
- Summary of support packages (in detail) to support the team internally
- Sharing press and print with local business groups to share with members :
 - Bath Chamber of Commerce
 - Bath Bid
 - Invest in Bath
 - Federation of Master Builders
 - Registered taxi drivers

- Southgate
- Creative Bath
- Other tbc.
- 'Certified compliant with Bath's CAZ' bus sticker for bus companies (and others) to promote clean engines on older vehicles – reassuring residents.

See month-by-month plan for more detail.

Community Liaison Team

A community liaison team is in place working with the installation team to plan and deliver communications for residents and businesses likely to be affected by street work. This is a year-long programme of works which includes laying ducts under footways for electrical cables and installing cameras and signage.

Communication will be by letter accompanied by a press release and social media (via the highways account) only if the work is significant. Works signs will also be installed in advance. The aim is to build good relations with those affected, avoiding ill-feeling by being helpful, knowledgeable, available and transparent.

There is already a dedicated web page at www.bathnes.gov.uk/CAZupdate which will eventually list and describe all planned and completed work. Comms will support the work of the CLO where required, ensuring that all of the communications are joined-up between departments and that it's cost-effective and efficient.

Target audience:

Households, communities, schools, and businesses in the city that are affected by street works

Key activities for CLO with support from communications:

- Develop a plan of street work identifying the type of work, level of disruption (small, medium, large) and the streets likely to be affected so that a communication plan can be drawn up
- Ensure this plan is fed back to central communications for joint transport planning during 2020
- Maintain a digest of planned and completed street work on a dedicated webpage www.bathnes.gov.uk/CAZupdate so that residents, stakeholders and the press can stay informed of progress and how works might affect them.
- Promote regular drop-ins (as per general campaign) where the public can talk to a team member and voice any concerns.
- Liaise with project team on what work will also require a press release and social media – write press releases as required
- Communicate with residents and ward members at least one week in advance of work starting, outlining what's happening, how it might affect residents, and why a CAZ is necessary (health reminder).
- Work efficiently with hybrid mail and the GIS team at the council to distribute letters or make a decision to drop by hand and discuss with residents
- Work efficiently with highways communication team
- Provide updates to the Roadworks Bulletin (Highways) if work is significant

- Reassure people about camera privacy and how data will be stored/handled
- Promote the CAZ_info@bathnes.gov.uk widely so people know who to contact if they have a concern or question about planned street works.
- Provide information and updates to Council Connect on how to respond to calls
- Monitor and manage complaints promptly and sensitively and liaise with the relevant teams so that issues are addressed and not repeated.
- Make our complaints policy available online, including the process
- Regularly inform customer service and OSS of works and circulate the complaints policy

Support for the project team

Key audience: Registered taxi/PHV drivers/firms, local bus companies running scheduled services and local coach companies.

The project team will continue to work closely with local bus and coach companies to help them access the funds enabling them to retrofit or replace non-compliant vehicles. This will ensure that all scheduled buses and the majority of coaches in Bath are compliant by switch-on.

- We'll promote this 'good news' story to reassure residents, and include information on this work in printed and online collateral.

Taxi/PHV drivers are an important audience and already receive regular communications about the CAZ direct from the taxi licensing team via text. The objective is to help drivers access the financial assistance scheme (to help upgrade their taxis/PHVs), understand the market for lower emission vehicles, discourage idling and keep drivers informed of licensing and policy changes. Regular events will be held specifically for registered drivers.

The following collateral will help to support the team, generate leads for the FAS, and promote their events:

- Update the dedicated landing page for taxi drivers online and promote the short URL www.bathnes.gov.uk/CAZTaxi
 - Include information and a link to the Support page
 - Include events listings for taxis
 - Publish taxi-focused FAQs arising from meetings
 - Include links and content to help taxis understand lower emission options (as required)
 - Include information on anti-idling information
- Promote 'taxi driver' good news stories in the press to reassure residents e.g. X% of taxis upgraded before switch on / clean fleet etc.
- Print 1000 plus of the A5 Support/FAS lead-generation leaflet to distribute at events and/or send to taxi drivers – include FAQs common to taxi and business audience.

See detailed plan, timeline and estimated costs on a separate spreadsheet

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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

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Appendix A. – Consultation Questionnaire and Leaflet

Appendix B. - Questionnaire data on respondent type

Appendix C. – Summary of businesses and organisations

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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.

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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 minister, 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 Ditcheat | 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.

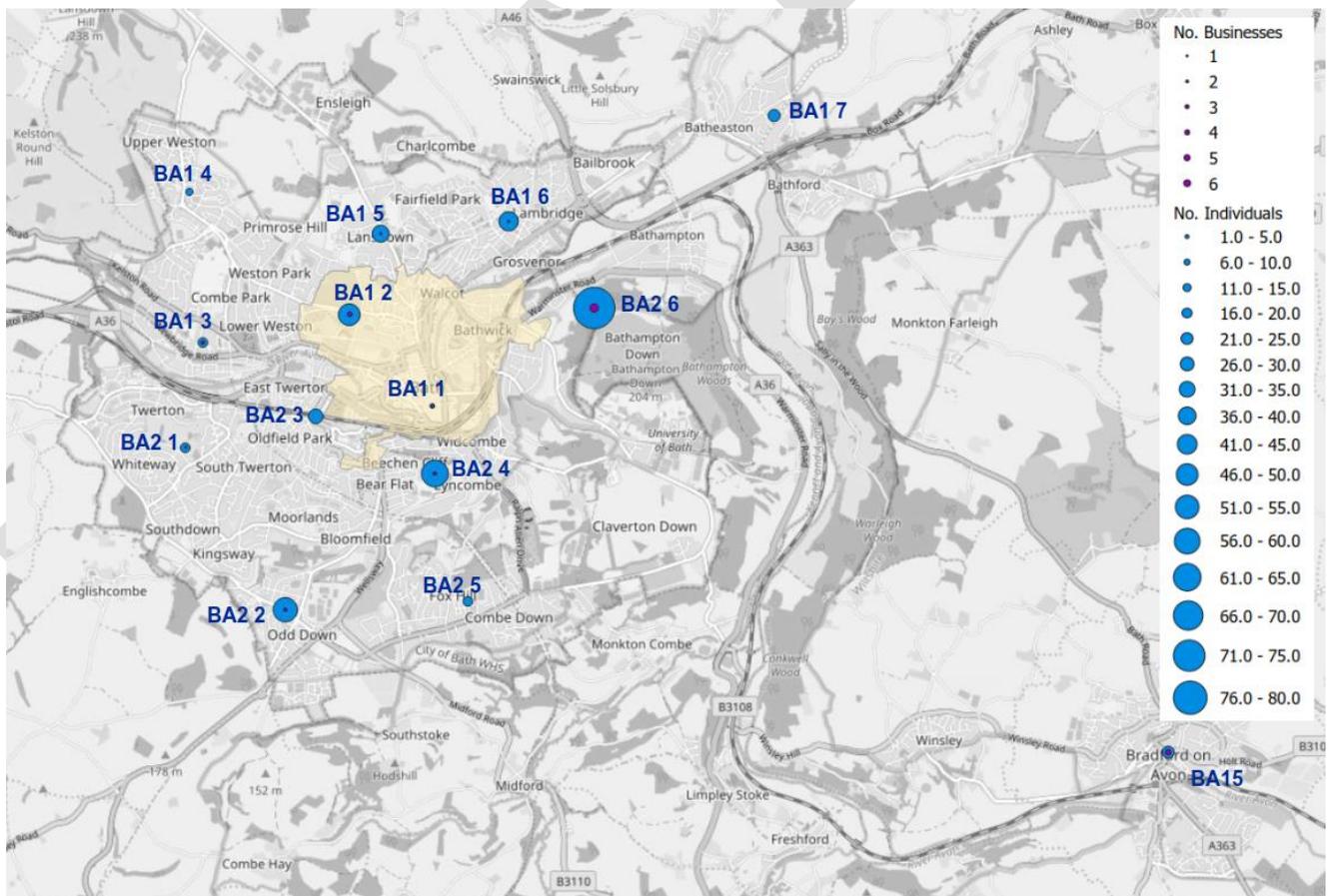


Figure 3-1: A visual representation of the postcode data received from the respondents

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 | |
| Respondents felt that additional steps should be taken in addition to the Class C CAZ, such as: <ul style="list-style-type: none"> • Additional measures to be implemented at peak traffic hours • Additional deterrents for all higher emission vehicles | 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. |

| 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> |
| Comments concerning the impact of a Class C CAZ on residents of the city and surrounding areas | |
| <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)

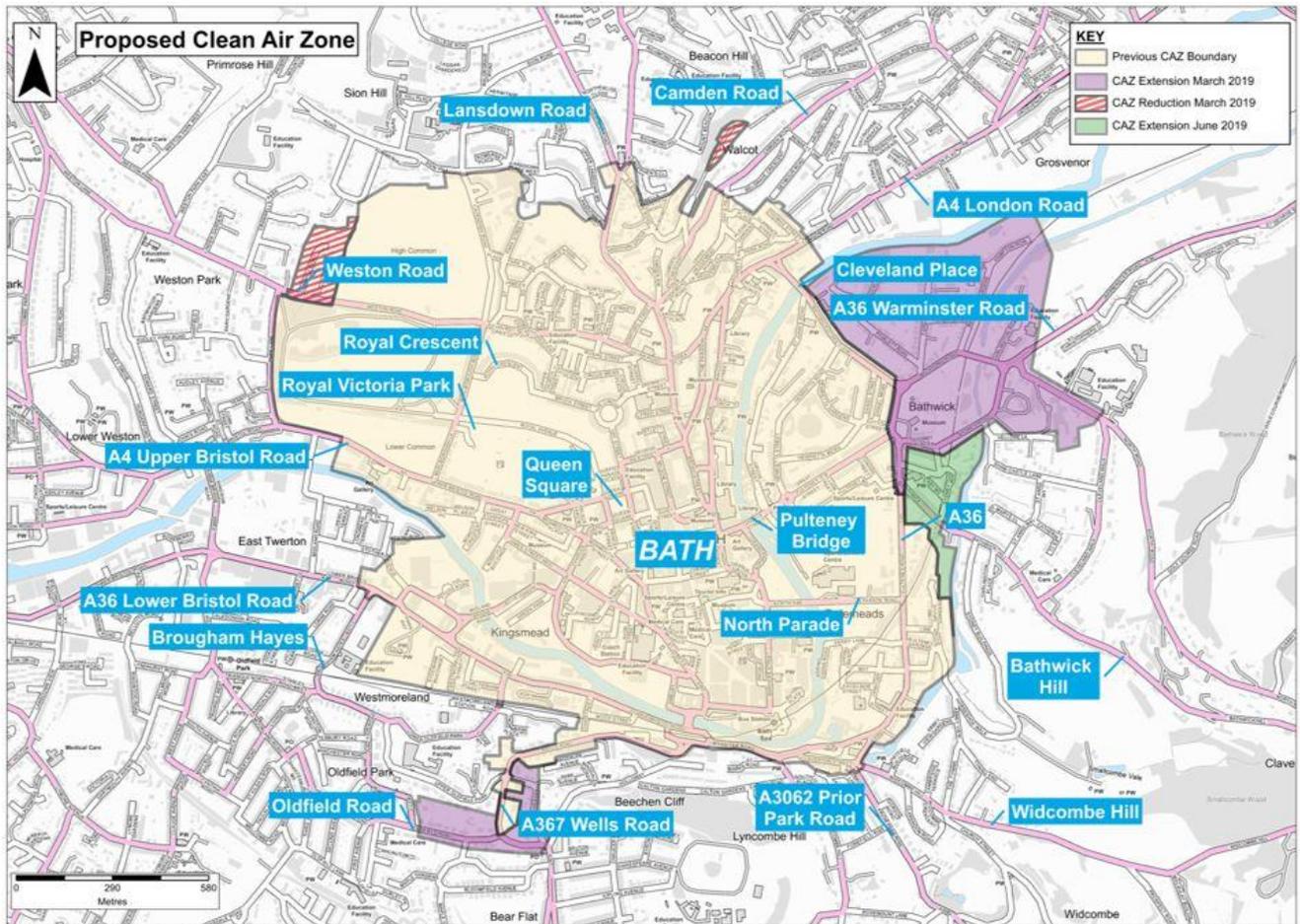


Figure 5-1: B&NES CAZ Boundary presented in the consultation questionnaire

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 | |
| <p>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.</p> <p>Respondents were concerned these vehicles would divert on the B1308 through Winsley which was inappropriate.</p> | <p>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/m³ of NO₂, 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.</p> |
| Inclusion of Oldfield Road/A367 junction area | |
| <p>Including Oldfield Road/A367 junction will add to issues in Moorfields and Moorlands with rat running past schools and family homes.</p> <p>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.</p> | <p>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.</p> <p>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.</p> |

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. | <p>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.</p> <p>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> |
| 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 | |
| <p>The zone should be expanded to cover the whole of Bath / all the residents of Bath / include all of the suburbs.</p> <p>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.</p> | <p>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.</p> <p>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> |
| 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 Wellsway, 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.

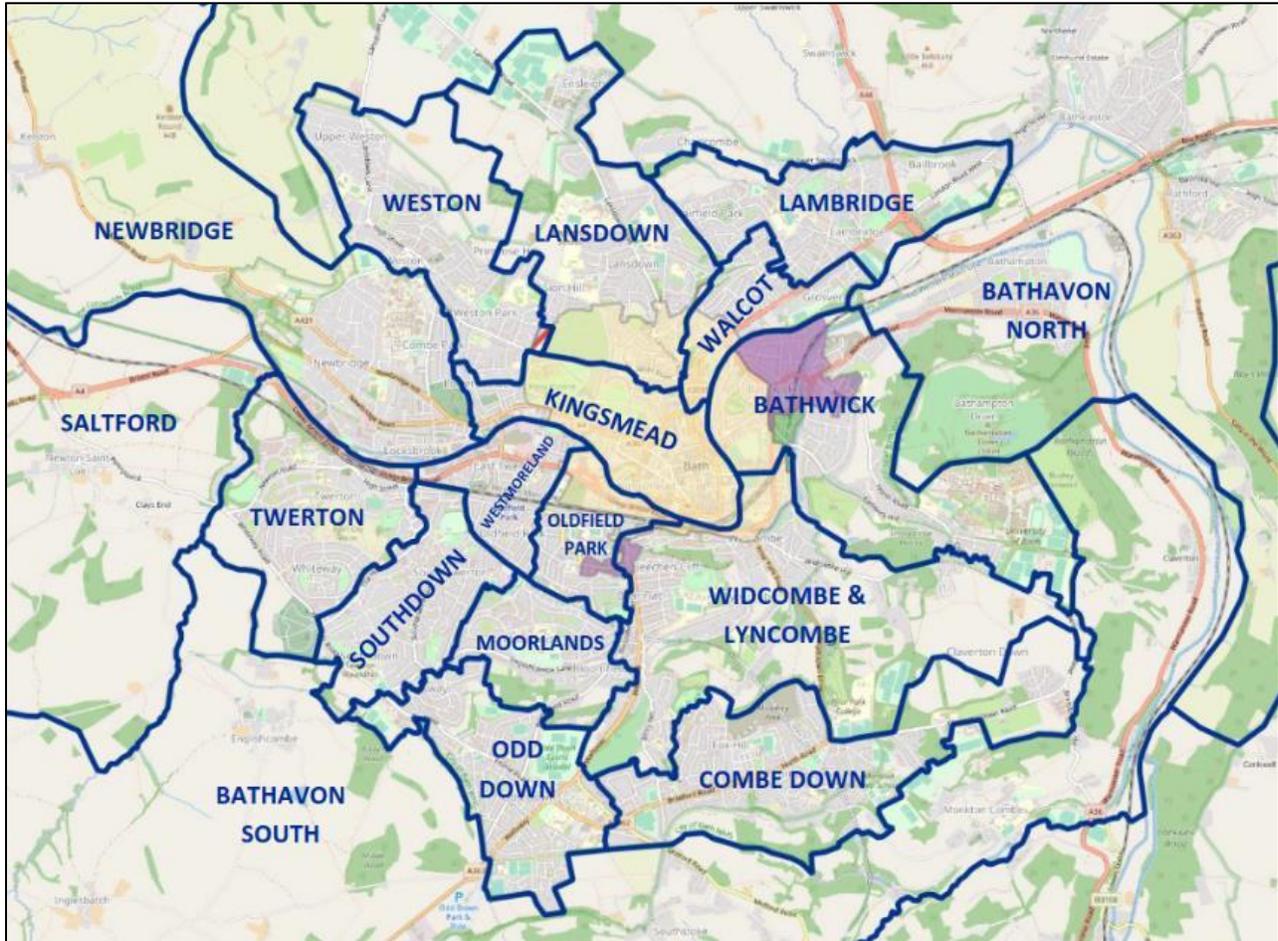


Figure 5-2: B&NES Electoral Wards

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 | 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. Similar issues were raised in response to the autumn 2018 consultation. The additional work undertaken at that time, to |

| 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> |
| <p>Bathwick</p> | |
| <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> | 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>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> |
| <p>Lansdown</p> | |
| <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> |
| <p>Moorlands</p> | |
| <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> |
| <p>Newbridge</p> | |
| <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> |
| <p>Odd Down</p> | |
| <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 |
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| | 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> |
| <p>Weston</p> | |
| <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> |
| <p>Widcombe & Lyncombe</p> | |
| <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 | |
| <p>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> | <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/m ³ 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 |
|---|--|
| <p>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.</p> | <p>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.</p> |
| <p>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.</p> | <p>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.</p> |
| <p>Walcot</p> | |
| <p>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.</p> | <p>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 NO₂, above the legal air quality limit.</p> |
| <p>Concern people would not be able to leave the city to travel to Chippenham from Ringswell Gardens due to the inclusion of London Road</p> | <p>Ringswell Gardens, and its junction with the London Road, is outside of the CAZ.</p> |
| <p>Other</p> | |
| <p>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.</p> | <p>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/m³ of NO₂, above the legal air quality limit.</p> |
| <p>A respondent expressed concern that the nearest petrol stations to them would only be available in Saltford and Odd Down.</p> | <p>The petrol station on London Road is also located outside of the zone.</p> |

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.

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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 |
|--|--|
| | <p>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.</p> |
| <p>The Queen Square proposal will negatively impact the health of pedestrians, cyclists and families and those at schools and hospitals on nearby routes.</p> | <p>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> |
| <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> |
| <p>Concerns about the impact of the Queen Square proposal on traffic conditions</p> | |
| <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>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>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>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. | <p>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.</p> <p>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.</p> <p>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.</p> |
| 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. | <p>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.</p> |
| 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. |

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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? <i>(Percentages are based on the 276 respondents to this question)</i> | | | | | |
|---|---|-----|----|-----|----------|-----|
| | 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 |
|---|--|
| <p>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.</p> <p>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.</p> | <p>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.</p> |
| <p>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.</p> | |
| <p>Bus companies should bear the cost of upgrading their vehicles.</p> | |
| <p>Can all buses be retrofitted? If older buses can't be, what will happen to these?</p> | <p>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.</p> |

| 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. |
| <p>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.</p> <p>Requests for greater clarity on the fleet replacement scheme.</p> <p>Consideration that coaches are low polluting per passenger and should be supported.</p> | <p>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.</p> <p>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.</p> |

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 <p>Consideration that weight restriction enforcement is critical for the success of the scheme.</p> | 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 |
|---|--|
| <p>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.</p> | <p>The Council continues to work to promote mode shift across the city in line with the Getting Around Bath Transport Strategy.</p> |
| <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: Scrap the tourist bus which circulate around Bath not at full capacity Prevent / ban tour buses from operating in the city and encourage visitors to use public transport</p> | <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.</p> |
| <p>Encourage and assist people to upgrade their vehicles to electric</p> | <p>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> |
| <p>The scheme should closely monitor increases / changes to traffic in the surrounding area. Suggestions include:</p> | <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,</p> |

| 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 | <p>Monitoring and Benefits Realisation Plan in Appendix R of the FBC.</p> |
| <p>Accompany the scheme with a reduction in car parking.</p> | <p>Parking is reviewed under the B&NES Parking Strategy and is outside the remit of this scheme.</p> |
| <p>Build a coach park to the east of Bath for coaches travelling from London and provide a shuttle service into the centre.</p> | <p>Coach parking is reviewed under the B&NES Coach Parking Strategy and is outside the remit of this scheme.</p> |
| <p>Support for a scrappage scheme for all polluting vehicles. Ask for money for a scrappage scheme for polluting private and other vehicles.</p> | <p>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.</p> |
| <p>Promoting non motor-vehicle use such as takeaway delivery bikes over motor vehicles.</p> | <p>The Council continues to work to promote mode shift across the city in line with the Getting Around Bath Transport Strategy.</p> |

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 |
|---|---|
| <p>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.</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> |
| <p>Walking improvements and incentives should include:</p> <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 <p>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</p> | <p>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.</p> <p>Improvements to walking infrastructure will be further considered as part of the wider transport strategy for Bath.</p> |
| <p>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.</p> | <p>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.</p> |
| <p>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.</p> | <p>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.</p> |

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 |
|---|---|
| <p>What is the meaning of school streets?</p> | <p>'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.</p> |

| 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 |
|--|---|
| <p>Buses should be the highest priority improvement.</p> <p>Buses should be upgraded to electric or greener buses.</p> | <p>The Council is working closely with bus operators and it is anticipated that buses servicing the city will be complaint 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.</p> <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> |

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 |
|---|--|
| <p>Additional park and ride capacity should include motorhome parking spaces</p> | <p>Noted.</p> |
| <p>A park and ride should be provided on each side of the city, so people do not need to cross the city to get a 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.</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>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.</p> | <p>Many of the other measures are focussed on improving other modes and encouraging walking and cycling.</p> |
| <p>Other improvements to park and rides should be considered, including:</p> <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. | <p>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.</p> |

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, followings 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 |
|---|--|
| <p>Support for the signage locations around Sydney Gardens / Sydney Road which take into account the built heritage.</p> <p>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.</p> | <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, with due consideration to turn-back options. This will be supported by a national communications campaign.</p> <p>The Council is liaising where necessary with Highways England and neighbouring authorities in relation to the provision of advanced signage.</p> <p>Existing signage is under review and will be rationalised as appropriate to minimise impact on the existing streetscape.</p> |
| <p>Ensure that signage is obvious, clear and can be read by drivers by:</p> <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. | |
| <p>Ensure that the heritage of the city is respected and maintained by avoiding excessive or inappropriate signage, particularly on Camden Road and Belgrave Crescent.</p> <p>Suggestions for this included:</p> <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. | |
| <p>Signs should also be placed within the CAZ to remind drivers that they are within it.</p> <p>Concern that many signs on the road will confuse drivers.</p> <p>Suggestion that signage which is currently unnecessary is removed.</p> <p>Instead of signs to mark the entry of the zone, consider green tarmac with message on.</p> <p>Display the charge on the signs to ensure affected drivers can divert their routes.</p> | |
| <p>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:</p> <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>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> |
| <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> | |
| 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>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>Vans with seats, that are classified as PLGs, and primarily used as cars should be exempt.</p> | |
| Local businesses | |
| <p>Concessions should support local businesses to upgrade their vehicles naturally over time without being forced into debt.</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> |
| <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> | |

| Comment / issue / question raised | Response/ how addressed |
|--|---|
| Those with disabilities | |
| <p>Various suggestions for additional concession and exemptions to support those with disabilities were included:</p> <ul style="list-style-type: none"> • Wheelchair Assisted Vehicles; and • Blue Badge holders. | <p>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.</p> |
| <p>For a carer to qualify for a concession, does the individual have to have a "higher mobility component of benefits" for exemption?</p> | <p>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.</p> <p>For further information on concessions refer to FBC-05 'Proposed System Design Features and Payment Exemptions'.</p> |
| Other exemptions | |
| <p>Taxis should be exempt because:</p> <ul style="list-style-type: none"> • They are routinely used by pensioners; and • Charging taxis will increase the price of fares. | <p>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.</p> |
| <p>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.</p> | <p>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.</p> |
| <p>Residents regardless of vehicle type should be exempt.</p> | <p>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.</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>Public transport, buses and coaches should not be charged or should have more time to adapt because:</p> <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. | <p>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.</p> <p>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.</p> |
| <p>Solo motorbikes should have an exemption</p> | <p>These vehicles are exempt in Bath's CAZ</p> |
| <p>Emergency vehicles should be exempt.</p> | |

| 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 | |
| Disagreement with the charge applying to: <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. | A Class C CAZ with traffic management enables compliance to be achieved in the shortest possible time. 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. Recovery vehicles have a concession. |
| 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. | <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> |
| Comments on Sustainable Modes of Travel | |
| Comments on Public Transport | |
| <p>Respondents suggested that key improvements are needed on public transport, including:</p> <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. |
| <p>Respondents provided suggestions for new railway stations in key locations such as:</p> <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 (night 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> |
| <p>Reference to Improvements to park and ride facilities within the city</p> | |
| <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 | |
| <p>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.</p> <p>Respondents also asked if the boundary could be amended if it is shown that emissions increase in other areas post scheme implementation.</p> | <p>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.</p> |
| <p>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.</p> | <p>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.</p> |
| <p>Concerns that the modelling undertaken hasn't taken into account any new developments within the city and should be remodelled to include these</p> | <p>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.</p> |
| <p>When will the legal requirement for air quality will be reached across the city?</p> | <p>The Council is working towards achieving compliance in the shortest possible time, as directed. This would be by 2021 at the latest.</p> |
| <p>What NO₂ data is held? And where can this information can be found?</p> | <p>Data on air quality in B&NES can be found in the Annual Status Reports which are published on the Council's webpages</p> |
| <p>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</p> | <p>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</p> |

| | |
|---|---|
| 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

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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 • Salford 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> |

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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

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Public consultation

Bath's Clean Air Zone

September/October 2019



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?

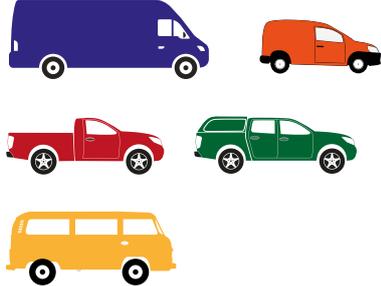
A euro standard (e.g. Euro 6/VI) represents the amount of pollution emitted by a vehicle's exhaust. A higher euro number indicates that the engine is newer and its emissions are cleaner. A lower euro number means the engine is older and more polluting. Diesels create more NO₂ than petrol vehicles.

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.

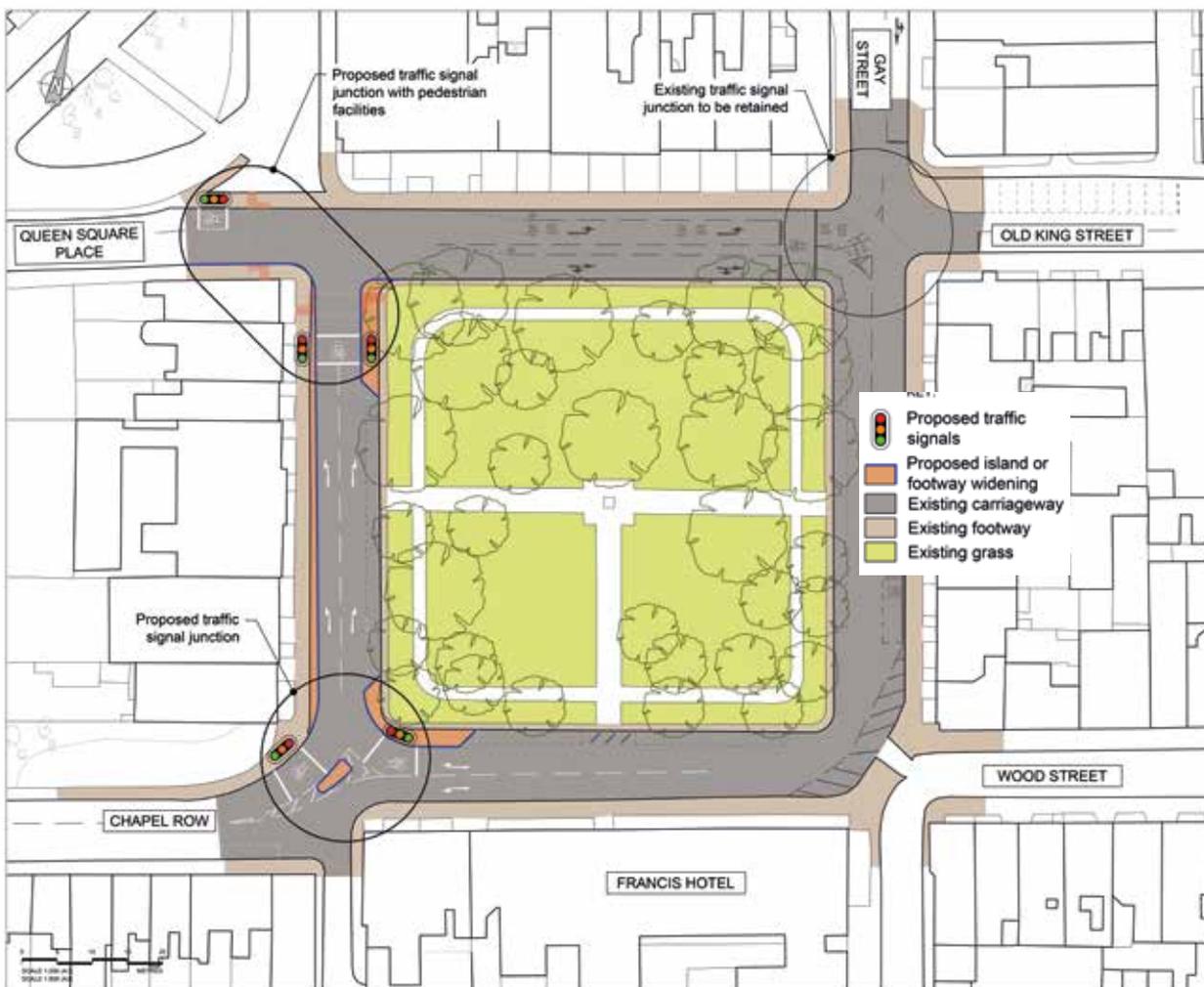
This is a temporary measure which will be removed once compliance is achieved.

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](https://www.facebook.com/bathnes)
 -  twitter.com/bathnes
- Use [#BathBreathes2021](https://twitter.com/hashtag/BathBreathes2021)



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:

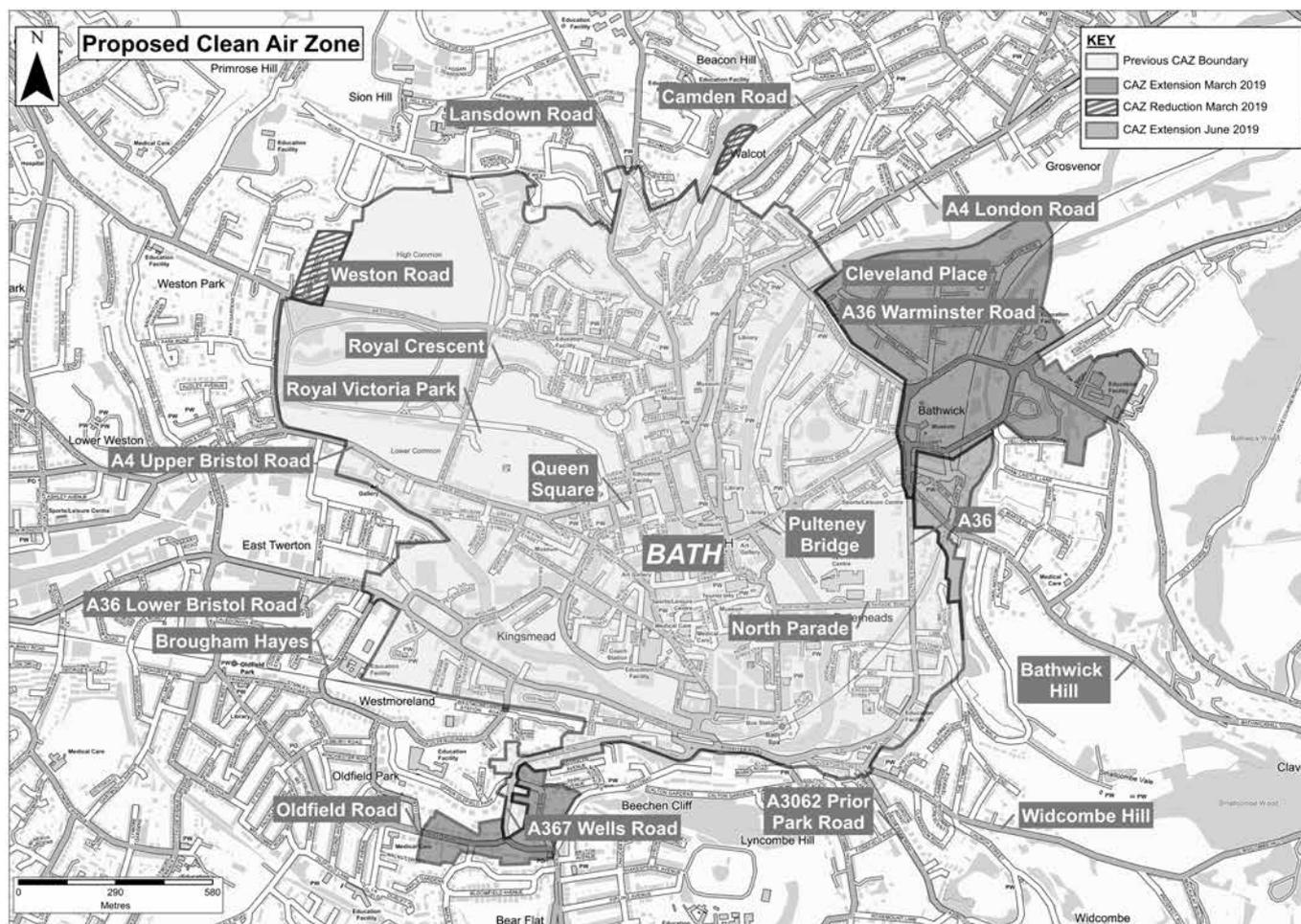
March 2019

- 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.



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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"/> |
| Enhancing the monitoring and evaluation of the scheme and implementing contingency plans if required | <input type="checkbox"/> |
| Maintaining and enhancing the existing walking and cycling network and creating low traffic neighbourhoods | <input type="checkbox"/> |
| Supporting walking, scooting and cycling to school initiatives and creating school streets | <input type="checkbox"/> |
| Supporting and enhancing the public transport network, including home to school transport | <input type="checkbox"/> |
| Providing additional park & ride capacity at existing park & ride sites and on existing bus routes | <input type="checkbox"/> |
| Providing schemes to reduce the impact of vehicles on the health and wellbeing of residents and visitors | <input type="checkbox"/> |
| Enhancing other sharing schemes such as the electric cycle hire scheme | <input type="checkbox"/> |
| Supporting the development of a mobility as a service (MaaS) platform – an app to encourage sustainable, multimodal travel | <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.

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

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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

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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> <ul style="list-style-type: none"> Provide a managed transition for businesses and individuals Ensure smart use of road space Ensure CAZ are a catalyst for behaviour change Promotion of leasing and renting Introduce funding for HGVs |

| Via | Overview of Comments |
|---------------|--|
| Letter | <p>Question 1: 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: 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: 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: Urge use of easy-to-understand signage at the height of HGVs sitting in their cabs.</p> <p>Question 9: Recommends intelligent phasing of charges applied. Concerns of charge amount for non-compliant HGVs 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. When do B&NES plan to stop charging HGVs? Support cleaner air, not at the cost of businesses closing, jobs being lost/price of good rising and HGV/LCV operators being priced out of supplying goods and services into clean air zones. Ready to work with B&NES on non-charging measures.</p> |
| Questionnaire | <p>Would prefer a two stage CAZ like Londons LEZ/ULEZ. Does not consider that targets can be met by excluding cars. 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 particularly 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 | <p>Consider the proposal will have a negative impact on air quality around St Andrews Church School.</p> |

Table C7: Feedback from other local organisations

| Via | Overview of Comments |
|----------------------|---|
| Organisations | |
| Questionnaire | <p>Concerned about the potential re-routeing of HGVs through Bradford on Avon.</p> |
| Questionnaire | <p>Consider that the work to date underestimates the likelihood of non-compliant vehicles routeing via Bradford on Avon.</p> |
| Questionnaire | <p>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.</p> |

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Equality Impact Assessment / Equality Analysis

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|---|--|
| Title of service or policy | Introduction of a Clean Air Zone (CAZ) in Bath and North East Somerset |
| Team | Development and Public Protection |
| Officer leading the completion of the EqIA | Cathryn Brown, Team Manager |
| Date of assessment | January 2020 |

The Public Sector Equality Duty (Section 149 of the Equality Act 2010) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people carrying out their activities.

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community and help the Council to better understand the potential impact of any proposals and consider mitigating actions. Equality Impact Assessments (EqIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

This document has been updated following the public consultation on the Charging Order in September-October 2019. It will remain an evolving document to ensure that all equality issues are properly considered during the life of the Clean Air Zone project.

Further information on the proposals can be found at <http://www.bathnes.gov.uk/bath-breathes-2021>.

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| 1. | The aims of the policy or service |
| 1.1 | <p data-bbox="271 903 465 932">Background</p> <ul data-bbox="271 943 2056 1361" style="list-style-type: none"> <li data-bbox="271 943 1939 1018">• Poor air quality is recognised as a major public health issue in Bath and North East Somerset and is identified as a corporate priority by the Council. <li data-bbox="271 1070 2056 1230">• In the report 'Every breath we take' published by the Royal College of Physicians and the Royal College of Paediatrics and Child Health in 2016, it states that some people will suffer more from air pollution because they live in deprived areas which often have higher levels of air pollution, they live, learn or work near busy roads or they may be more vulnerable because of pre-existing medical conditions. <li data-bbox="271 1283 2056 1361">• Nitrogen dioxide and particulate matter are the pollutants which are identified as presenting the highest risk and these are monitored throughout the authority. Exposure to high levels of NO₂ can make existing heart and lung conditions such as |

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| | <p>asthma worse; particulates are now known to contribute to heart disease and lung cancer (Air Quality - a briefing for Directors of Public Health, DEFRA, 2017).</p> <ul style="list-style-type: none"> • As a pollutant, nitrogen dioxide has been assigned a national air quality objective, requiring compliance by the Council to reduce levels below the objective limit. The main source of nitrogen dioxide is from vehicle emissions, with diesel vehicles being the major contributing source of pollution. • The Council is responsible for monitoring and achieving compliance under Part IV of the Environment Act 1995. In 2002 Bath city centre and the main roads leading into it, was declared as an Air Quality Management Area. An Air Quality Action Plan was developed and has been reviewed several times, the latest review being in 2017. The opportunity was taken to feed comments from this review into the consultation and engagement for the National Air Quality Plan. The updated Action Plan will be published following the completion of the project. |
| 1.2 | <i>Briefly describe purpose of the service/policy including: how the service/policy is delivered and by whom; if responsibility for its implementation is shared with other departments or organisations and intended outcomes</i> |
| 1.3 | <ul style="list-style-type: none"> • The implementation of this policy must be delivered through engagement with communities within B&NES. This will be completed by teams across the Council, with support from external organisations such as the Joint Air Quality Unit (JAQU), Highways England, neighbouring local authorities and transport operators. • The intended outcome of this policy is to achieve compliance with the Ministerial Directions served on the Council by DEFRA and DfT (known as the Joint Air Quality Unit) in 2017 and 2019. The Directions are served under the Environment Act 1995. |
| 1.4 | <i>Provide brief details of the scope of the policy or service being reviewed, for example: is it a new service/policy or review of an existing one? Is it a national requirement? How much room for review is there?</i> |
| 1.5 | <ul style="list-style-type: none"> • This is the introduction of a new policy which is required following the service of Ministerial Directions referred to in 1.2 above. • The Council is one of several local authorities served with such Directions, as part of the National Air Quality Plan, to deliver compliance with the national air quality objective for nitrogen dioxide in the shortest time possible and by 2021 at the latest. |

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| | <ul style="list-style-type: none"> • Technical assessment and modelling carried out to date, confirms that in order to achieve the required reduction in concentrations, a Clean Air Zone is required where drivers of certain higher emission vehicles will be charged for entering a defined geographical zone in the city. In addition to this charging measure, a suite of non-charging measures are being proposed to support the necessary behaviour change from the public and businesses. The Council is also considering possible exemptions and concessions to mitigate any negative impacts for groups through the introduction of a Clean Air Zone. • The Strategic Outline Business Case (SOBC) established that, only a charging Class D CAZ would achieve compliance by 2021. This scheme was subject to public consultation in 2018. Following further review, assessment showed that a charging Class C resulted in a single exceedance at Gay St caused by localised traffic issues. As such, traffic management measures at this location were investigated and a feasible scheme developed. When assessed, a second option comprising a charging Class C CAZ with a traffic management scheme in place at Queen Square, was found to achieve the required compliance by 2021. • The Ministerial Directions require the Council to identify a preferred option that will deliver the necessary compliance in the shortest time possible. The Council's Cabinet decided upon the preferred option of a Charging Class C CAZ with traffic management in March 2019. A public consultation on the Charging Order for the CAZ was carried out in September 2019 and the Full Business Case (FBC) is subject to a Cabinet decision in January 2020. |
| 1.6 | <i>Do the aims of this policy link to or conflict with any other policies of the Council?</i> |
| 1.7 | <p>This policy has links at both the sub-regional and local level:</p> <p>Sub-regional:</p> <ul style="list-style-type: none"> • The West of England LEP's Strategic Economic Plan (2015-30), which establishes the economic vision for the sub-region. • The West of England Joint Local Transport Plan (2011-26), which sets out the transport priorities for the sub-region. • Partnership arrangements to identify the economic development and growth projections for the sub-region. • The West of England Joint Transport Strategy (JTS), which provides a clear direction for the long-term development of the transport system in the West of England to 2036 and beyond. <p>Local:</p> |

- B&NES Placemaking Plan (PMP), which aims to guide development up until 2029 and ensure that any developments within this timeframe are high quality, sustainable, well located and supported by appropriate infrastructure.
- B&NES Getting Around Bath (GAB) Transport Strategy, which aims to ‘enhance Bath’s unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core. This will enable more economic activity and growth, while enhancing its special character and environment and improving the quality of life for local people’.
- The B&NES Parking Strategy, which sets out the need to reduce the intrusion of vehicles into urban centres, reflecting concerns surrounding the impact of high numbers of vehicle movements on air quality.
- The B&NES Public Realm and Movement Strategy for Bath City Centre ‘is designed to give pedestrians, cyclists and public transport vehicles priority over cars, and deliver a network of beautiful, refashioned streets and public spaces’.
- Our Customer Services Transformation programme could result in less face to face interaction with customers at our One Stop Shops as we encourage those who are able to access information and services online. It is proposed that all Penalty Charge Notice charges incurred as a result of the Clean Air Zone will be managed by an online system which can be accessed at the One Stop Shop locations.
- The Council declared a Climate Emergency in March 2019 which identifies as a priority the need for a major shift to mass transport, walking and cycling to reduce carbon emissions by 2030.

| 2. Consideration of available data, research and information | | |
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| Key questions | | Data, research and information that you can refer to |
| 2.1 | What is the equality profile of the team delivering the service/policy? | The size of the Environmental Monitoring Team is too small to provide any meaningful equality profile information. |
| 2.2 | What equality training have team members received? | Team members in Environmental Monitoring have received equalities training and are regularly updated on equalities issues. |
| 2.3 | What is the equality profile of | Information about the equalities profile of people in Bath and North East Somerset can be found at http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/census- |

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| | service users? | <u>and-population</u> |
| 2.4 | What other data do you have? | As part of the Final Business Case (FBC) for the Clean Air Zone, a Distribution and Equality Impact Analysis has been carried out. This provides more detailed information on the groups which could be impacted by the introduction of a charging Class C CAZ and is appended to the FBC. |
| 2.5 | What engagement or consultation has been undertaken? | The Council has been engaging with the public since April 2018 on the introduction of a Clean Air Zone in Bath and a summary of the outcomes of this work can be found in the Engagement and Consultation reports which are appended to the FBC and are available on the Council's webpages. |
| 2.6 | If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this? | <ul style="list-style-type: none"> • Formal periods of public consultation have taken place in October-November 2018 and September-October 2019. Through these consultations, contacts have been made with specific organisations to better understand both the positive and negative impacts of introducing a charging Clean Air Zone. Whilst there will be no further formal public consultations following the decision on the FBC, there will be ongoing engagement and communication with organisations prior to the Clean Air Zone becoming operational in late 2020. • Such organisations include taxi operators, community transport providers, healthcare providers and charities (this is not intended to be an exhaustive list). • All consultation documents have been made accessible via the Council's website, One Stop Shops and libraries. During the last consultation 25 paper surveys were completed and over 600 surveys were completed on line. • Communication regarding any decision and implementation process relating to the charging CAZ, will be designed to meet the communication needs of our diverse community (i.e. we will use a variety of methods to make sure that everyone is kept informed and make information available in different formats). |

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| 3 | <p>Assessment of impact:</p> <p><i>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy meets any particular needs of equalities groups or helps promote equality in some way. Could have a negative or adverse impact for any of the equalities groups</i></p> |
| 3.1 | <p>An initial screening process for each of the protected characteristics was carried out and has been updated. A separate equality impact assessment will be developed for the proposed traffic management measures in Queen Square.</p> |
| 3.2 | <p>Potential positive impacts:</p> |
| 3.3 | <p>Although air pollution can be harmful to everyone, some people are more affected than others because they are exposed to higher levels of air pollution in their day to day lives, live in a polluted area, or are more susceptible to health problems caused by air pollution. The most vulnerable people face all of these disadvantages. Overall, the introduction of a charging Class C CAZ, which brings about compliance with legal levels for nitrogen dioxide, will have positive health benefits for all and in particular for those people in the following protected characteristic groups:</p> <ul style="list-style-type: none"> • Age • Disability • Pregnancy and Maternity <p>There is a location in Whiteway, Bath where small increases in traffic flow, due to the additional traffic management measures in Queen Square, will result in a small net decrease in air quality for this area, where there is a higher concentration of children. However, irrespective of this, it is not anticipated that the national objective for nitrogen dioxide will be exceeded in this location. An extensive monitoring and evaluation programme has been developed to install additional air quality monitoring sites and automatic traffic counters to understand if the modelling outcomes are as expected.</p> <p>Other positive impacts are likely to include small scale public transport accessibility benefits due to a reduction in traffic volumes within the Clean Air Zone area and impacts of the supporting abatement measures. These benefits are likely to be concentrated on existing bus users who are typically more likely to be from lower income groups, older people, and households without a car than the background population.</p> |

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| 3.4 | Potential negative impacts: |
| 3.5 | For a charging Class C CAZ, the following groups could be negatively impacted for reasons of accessibility and affordability: <ul style="list-style-type: none"> • Age • Disability • Race • Residents living outside of the proposed CAZ • Businesses |

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| 4 | <i>Gender – identify the impact/potential impact of the policy on women and men.</i> |
| 4.1 | <i>Details of the impact</i> |
| 4.2 | No identified impact. |

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| 5 | <i>Pregnancy and maternity</i> |
| 5.1 | <i>Details of the impact</i> |
| 5.2 | <ul style="list-style-type: none"> Emerging evidence suggests that air pollution can affect the growth of the unborn baby and may be linked to premature birth (<i>Impact of London's road traffic air and noise pollution on birth weight: retrospective population-based cohort study, British Medical Journal 2017.</i>) (RCPCH and RCP Report Every Breath We Take). Therefore, the reduction in nitrogen dioxide levels brought about by compliance with the Ministerial Directions should have a positive impact on people within this protective characteristic group. Under a charging Class C CAZ, it is possible that some people may experience problems in accessing medical appointments, toddler groups or other support networks for parents, because of impacts on community transport and health care providers and voluntary groups. |
| 5.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 5.4 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022 <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a |

concession until 31 December 2022.

- Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December 2022.
- Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 December 2022.
- Euro 4&5 diesel vehicles used by registered healthcare and educational providers for work purposes, would be eligible for a concession until 31 December 2022.
- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

| 6 | Disability | | | | | | | | | | | | | | | |
|-----------------------|--|--------------------------------|---------------|--------------------------------|-----------------------|------|------|-------------|------|------|--------|-------|------|--------|------|------|
| 6.1 | <i>Details of the impact</i> | | | | | | | | | | | | | | | |
| 6.2 | <p>Some disabled people have chronic conditions which can be made worse by air pollution:</p> <table border="1"> <thead> <tr> <th>Disease</th> <th>No. of people</th> <th>Proportion of B&NES population</th> </tr> </thead> <tbody> <tr> <td>Chronic heart disease</td> <td>5737</td> <td>2.8%</td> </tr> <tr> <td>Stroke/TIA*</td> <td>3656</td> <td>1.8%</td> </tr> <tr> <td>Asthma</td> <td>12912</td> <td>6.2%</td> </tr> <tr> <td>COPD**</td> <td>2939</td> <td>1.4%</td> </tr> </tbody> </table> <p>Source: QOF indicators 2017/2018 available from: https://digital.nhs.uk/data-and-information/publications/statistical/quality-and-outcomes-framework-achievement-prevalence-and-exceptions-data/2017-18 *transient ischemic attack, ** Chronic Obstructive Pulmonary Disease</p> <p>Therefore, improvements in air quality will benefit this group.</p> <ul style="list-style-type: none"> • Disabled people are likely to have concerns over access to a range of key amenities (e.g. health facilities), so any change in accessibility could hinder their ability to reach such facilities. • The Distribution and Equality Impact Analysis also indicates that communities with a high disability ratio are located throughout the Clean Air Zone area and are particularly concentrated in central Bath and on the western periphery of the city. Therefore, the disabled population in central Bath may suffer from reduced accessibility with the implementation of the proposed Clean Air Zone scheme, due to more limited choices on modes of compliant transport. • For a charging Class C CAZ, larger increases in motor traffic flows will occur in areas with higher than average concentrations of disabled people, and the larger decreases in motor traffic will occur in areas with the highest average concentrations of disabled people. As such, disabled people will see the greatest share of both the benefits and disbenefits in terms of severance. | Disease | No. of people | Proportion of B&NES population | Chronic heart disease | 5737 | 2.8% | Stroke/TIA* | 3656 | 1.8% | Asthma | 12912 | 6.2% | COPD** | 2939 | 1.4% |
| Disease | No. of people | Proportion of B&NES population | | | | | | | | | | | | | | |
| Chronic heart disease | 5737 | 2.8% | | | | | | | | | | | | | | |
| Stroke/TIA* | 3656 | 1.8% | | | | | | | | | | | | | | |
| Asthma | 12912 | 6.2% | | | | | | | | | | | | | | |
| COPD** | 2939 | 1.4% | | | | | | | | | | | | | | |
| 6.3 | <i>What steps have been or could be taken to address the impacts?</i> | | | | | | | | | | | | | | | |
| 6.4 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> | | | | | | | | | | | | | | | |

Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.

Relevant automatic exemptions:

- Vehicles for disabled people which are exempt from vehicle road tax.

Relevant automatic concessions under consideration:

- Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022

Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).

- Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a concession until 31 December 2022.
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- Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 December 2022.
- Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022.
- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

| 7 | Age | | | | | | | | | | | | | | | | | | | | | | | | |
|----------|--|--------|--------|-----------|------------------|-----------|------------------|-----|--------|--------|--------|-------|-----|-----|-------|-------|-------|-------|-----|-----|-------|-------|-------|-----|-----|
| 7.1 | Details of the impact | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.2 | <p>Children and young people may be more vulnerable to the health impacts of air pollution (<i>World Health Organization (2013) Review of evidence on health aspects of air pollution</i>).</p> <p>There is good evidence for the association between the development of asthma in childhood and traffic-related air pollution https://www.sciencedirect.com/science/article/pii/S0160412016307838?via%3Dihub</p> <p>Further, there is evidence to suggest that the elderly are disproportionately affected by the public health impacts of air pollution (<i>Simoni et al., Adverse effects of outdoor pollution in the elderly, Journal of Thoracic Disease, January 2015</i>).</p> <p>The number and proportion of older people in B&NES is projected to increase over the coming years. Between 2016 and 2029 the number of over 75's in the population is projected to increase by 36% (approximately 6,000 people). Over the same time period the numbers of people over 90 are projected to increase by 25%. (<i>Source: B&NES JSNA</i>)</p> <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>2022</th> <th>2029</th> <th>2016-2029</th> <th>Change 2016-2029</th> </tr> </thead> <tbody> <tr> <td>75+</td> <td>16,600</td> <td>19,300</td> <td>22,600</td> <td>6,000</td> <td>36%</td> </tr> <tr> <td>85+</td> <td>5,300</td> <td>5,500</td> <td>6,700</td> <td>1,400</td> <td>26%</td> </tr> <tr> <td>90+</td> <td>2,000</td> <td>2,100</td> <td>2,500</td> <td>500</td> <td>25%</td> </tr> </tbody> </table> <p>Therefore, the reduction in nitrogen dioxide levels brought about by compliance with the Ministerial Direction should have an overall positive impact on people within this protective characteristic group.</p> <ul style="list-style-type: none"> • There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the Clean Air Zone area and impacts of the supporting abatement measures. These benefits are likely to be concentrated on existing bus users who are typically likely to include older people. • Children and elderly people require access to a range of key amenities (e.g. schools and health facilities), so any change in accessibility could hinder their ability to reach such facilities. This is likely to be an impact under a charging Class C CAZ because of impacts on community transport providers. | | 2016 | 2022 | 2029 | 2016-2029 | Change 2016-2029 | 75+ | 16,600 | 19,300 | 22,600 | 6,000 | 36% | 85+ | 5,300 | 5,500 | 6,700 | 1,400 | 26% | 90+ | 2,000 | 2,100 | 2,500 | 500 | 25% |
| | 2016 | 2022 | 2029 | 2016-2029 | Change 2016-2029 | | | | | | | | | | | | | | | | | | | | |
| 75+ | 16,600 | 19,300 | 22,600 | 6,000 | 36% | | | | | | | | | | | | | | | | | | | | |
| 85+ | 5,300 | 5,500 | 6,700 | 1,400 | 26% | | | | | | | | | | | | | | | | | | | | |
| 90+ | 2,000 | 2,100 | 2,500 | 500 | 25% | | | | | | | | | | | | | | | | | | | | |

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| | <ul style="list-style-type: none"> • The charging Class C CAZ results in both motor traffic flow increases and decreases in central Bath due to the Clean Air Zone charge and traffic management scheme on Queen Square. As there are areas with fewer children within the charging area, this is a group likely to experience the most benefits and disbenefits from noise, accident, and severance impacts as a result of the charging Class C CAZ. • Under the charging Class C CAZ scheme, small increases in traffic flow due to the additional traffic management measures in Queen Square will result in a small net decrease in air quality for the area of Whiteway Road/Rush Hill where there is a high concentration of children. However, irrespective of this, it is not anticipated that the national objective for nitrogen dioxide will be exceeded in this location. |
| 7.2 | <i>What steps have been or could be taken to address the impacts?</i> |
| 7.3 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022 <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> • Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a concession until 31 December 2022. |

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| | <ul style="list-style-type: none">• Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December 2022.• Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 December 2022.• Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022.• Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024. |
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| 8 | Race |
| 8.1 | <i>Details of the impact</i> |
| 8.2 | <p>The B&NES population contains fewer than the national average of black and minority ethnic people (5.4% as opposed to 14.03% nationally).</p> <p>The Joint Strategic Needs Assessment identifies that in the Bath area only Bathwick (14.70%) had a higher proportion of black and minority ethnic people in 2011 than the England & Wales average (14.03%). However, only two of the wards, Lyncombe (4.21%) and Lambridge (5.32%) had a lower proportion of black and minority ethnic people than the B&NES average (5.42%).</p> <p>It is possible that this group of people may be affected by any changes in accessibility in reaching facilities such as community and medical centres.</p> |
| 8.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 8.4 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022. <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> |

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| 9 | <i>Religion/belief</i> |
| 9.1 | <i>Details of the impact</i> |
| 9.2 | <p>A number of faith-based venues are located within the proposed boundary of the Clean Air Zone, e.g. Bath City Church, Elim Church and Bath Islamic Centre. Attendees to these venues maybe disadvantaged if they do not have alternative, compliant methods of transport.</p> <p>This is likely to be an impact under a charging Class C CAZ if community transport providers are impacted.</p> |
| 9.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 9.4 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022. <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> • Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a concession until 31 December 2022. • Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December |

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| | <p>2022.</p> <ul style="list-style-type: none"> • Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 December 2022. • Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022. • Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024. |
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| 10 | <i>Sexual orientation; marriage and civil partnership and transgender people</i> |
| 10.1 | <i>Details of the impact</i> |
| 10.2 | No identified impact. |

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| 11 | <i>Whilst not protected characteristics, the Council has chosen to include the following issues because of the distinctive context of B&NES.</i> |
| 11.1 | <i>Socio-economically disadvantaged</i> –factors like family background, educational attainment, neighbourhood, employment status can influence life chances |
| 11.2 | <i>Details of the impact</i> |
| 11.3 | <ul style="list-style-type: none"> • The Distribution and Equality Impact Analysis indicates that the most acute concentrations of low-income households are located in and around Twerton on the western outskirts of Bath. • Under a charging Class C CAZ, small increases in traffic flow on Whiteway Road, due to the additional traffic management measures in Queen Square, result in a small net increase in nitrogen dioxide concentrations in this location; all other locations will benefit from a decline in nitrogen dioxide concentrations. • There are also areas of income deprivation in central Bath too (albeit less severe than on the western periphery of the city). Under the scheme it is anticipated that there will be a more significant reduction in nitrogen dioxide concentrations in these communities, contributing to a notable beneficial air quality impact. • There are likely to be small scale public transport accessibility benefits due to a reduction in traffic volumes within the CAZ area and impacts of the supporting abatement measures. These benefits are likely to be concentrated on existing bus users who are typically more likely to include lower income groups. • It is possible that people within this group may find it difficult to access and afford alternative, compliant methods of transport, particularly if they are low paid and work antisocial or flexible shifts. • In addition, sole traders who own non-compliant LGV's could experience affordability impacts under the scheme. |
| 11.4 | <i>What steps have been or could be taken to address the impacts?</i> |
| 11.5 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues).</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> |

Relevant automatic exemptions:

- Vehicles for disabled people which are exempt from vehicle road tax.

Relevant automatic concessions under consideration:

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- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

Additional measures:

- Ongoing monitoring of air quality levels across the authority, including Whiteway, to monitor any increases in nitrogen dioxide levels under the scheme, so that corrective action can be taken.
- Ongoing monitoring of traffic flows and road traffic accident data across the authority to assess any unforeseen changes so that corrective action can be taken.

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| 12 | <i>Rural communities – identify the impact/ potential impact on people living in rural communities</i> |
| 12.1 | <i>Details of the impact</i> |
| 12.2 | <p>Those people living in rural communities may have less access to public transport options to get to their place of work or for accessing leisure and social activities.</p> <p>This is likely to be a significant impact under a charging Class C CAZ if community transport and taxis are impacted.</p> |
| 12.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 12.4 | <p>Ongoing dialogue with the relevant Area Forums.</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022. <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> • Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a concession until 31 December 2022. • Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December 2022. • Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 |

December 2022.

- Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022.
- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

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| 13 | Residents living in Bath |
| 13.1 | <i>Details of the impact</i> |
| 13.2 | <p>This group of people benefit from improvements to air quality from reductions in circulating traffic through modal shift and avoidance.</p> <p>Under a charging Class C CAZ there could be:</p> <ul style="list-style-type: none"> • Increased availability of on street parking spaces for permit holders from greater car park and park and ride usage. • Reduction in circulating traffic looking for a free space and decreased congestion from greater car park and park and ride usage. • Increased costs for entering the CAZ if either residents or contractors do not own a compliant vehicle. Contractors could pass these costs onto customers. |
| 13.3 | <p>Ongoing consultation with the Council's Independent Equality Advisory Group (this is the Council's forum for equality issues) and Residents Associations within the city.</p> <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022 <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> • Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a |

concession until 31 December 2022.

- Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December 2022.
- Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 December 2022.
- Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022.
- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

| | |
|-------------|---|
| 14 | Residents living outside of the proposed zone |
| 14.1 | <i>Details of the impact</i> |
| 14.2 | Increased potential for non-compliant vehicles to enter residential areas, looking for a diversion route or parking outside of the Clean Air Zone. |
| 14.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 14.4 | <p>Attendance at Residents Association and Area Forum meetings to explain the purpose of the Clean Air Zone and encourage feedback.</p> <p>Mitigations:</p> <ul style="list-style-type: none"> • Amendment of the CAZ boundary to include the Pulteney Estates Area, Bathwick, Sydney Place and Oldfield Park areas • Review and extension of Resident's Parking Zones. |

| | |
|-------------|---|
| 15 | Businesses |
| 15.1 | <i>Details of the impact</i> |
| 15.2 | <p>The introduction of a Clean Air Zone could bring positive impacts:</p> <ul style="list-style-type: none"> • Increased availability of on street parking spaces for customers with compliant vehicles looking for short term 'pop and shop' parking. • Reduction in circulating traffic looking for a free space and decreased congestion. • Improvements to air quality from reduction in circulating traffic resulting in longer dwell times. <p>There could also be negative impacts including:</p> <ul style="list-style-type: none"> • The perception that the Clean Air Zone could deter footfall in central Bath as consumers and tourists opt to visit alternative locations. • Increased charges for deliveries to/from businesses located in the central area, providing additional costs that would either need to be absorbed by the business (affecting profitability) or passed on to consumers (increasing prices and potentially deterring custom). • Impacts on a range of businesses located outside the Clean Air Zone that require routing of LGVs/HGVs through the Clean Air Zone as part of their day-to-day activities (e.g. for trades people or for suppliers/deliveries). Although these businesses are not directly affected by the Clean Air Zone based on their geographical location within the Clean Air Zone, their business practices may mean regular entry to the Clean Air Zone, potentially resulting in charges being imposed. • Impacts on businesses which rely on employment sourced from a wide geographic labour market; imposing a charge on non-compliant vehicles could cause a contraction of this market as labour located in the wider geographic area choose to work in other locations that are unaffected by a Clean Air Zone. |

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|------|--|
| | |
| 15.3 | <i>What steps have been or could be taken to address the impacts?</i> |
| 15.4 | <p>Engagement with:</p> <ul style="list-style-type: none"> • Various Council departments including the Heritage Services and Economic Regeneration teams, • Bath Business Improvement District, • Bus, coach and taxi operators • Major employers e.g. Royal Mail • Development of delivery and servicing pilots <p>Relevant mitigation measures funded from the Clean Air Fund:</p> <p>Financial assistance through an interest free loan and/or grant for transport providers to upgrade to a compliant vehicle.</p> <p>Relevant automatic exemptions:</p> <ul style="list-style-type: none"> • Vehicles for disabled people which are exempt from vehicle road tax. <p>Relevant automatic concessions under consideration:</p> <ul style="list-style-type: none"> • Euro 4&5 diesel wheelchair accessible taxis and PHVs would receive a concession until 31 December 2022. <p>Relevant registered local concessions under consideration: (for these concessions owner/drivers would need to pre-register their vehicle and register each day they enter the zone for fees to be waived).</p> <ul style="list-style-type: none"> • Euro 4&5 diesel vehicles with a valid community transport permit not otherwise exempt, would be eligible for a concession until 31 December 2022. • Euro 4&5 diesel vehicles used by registered blue badge holders, would be eligible for a concession until 31 December 2022. • Vehicles under the terms of the proposed financial assistance scheme, would be eligible for a concession until 31 |

December 2022.

- Euro 4&5 diesel vehicles used by registered healthcare providers for work purposes, would be eligible for a concession until 31 December 2022.
- Vehicles used by voluntary organisations in support of the emergency services, would be eligible for a concession until 31 December 2024.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

| Issues identified | Actions required | Progress milestones | Officer responsible | By when | Completion Date |
|--|---|--------------------------------------|---------------------|---------------|-----------------|
| <p>Ongoing collection of information about the potential impacts on people in the following protected characteristic groups:</p> <ul style="list-style-type: none"> • Disability • Age • Black and Ethnic Minority Groups • Rural Communities • Pregnancy and Maternity • Businesses | Ongoing engagement with impacted groups | At implementation stage in late 2020 | Cathryn Brown | December 2020 | |
| Are there possible mitigations which have been missed? | Development of ideas through feedback received during the public consultation on the Charging Order | At FBC stage in January 2020 | Cathryn Brown | January 2020 | January 2020 |
| | | | | | |

| | | | | | |
|---|--|--|-----------------|---------------------------|--|
| Disproportionate impact on disabled people who do not use a specific vehicle but are transported by others in their vehicle | Work with Central Government to ensure that a system is in place to allow a blue badge to be registered to any vehicle the holder is travelling in | To be developed and peer group tested | Chris Major | Ongoing | |
| Specific impact on those in the lowest socio-economic groups | Targeted financial assistance for those who need it most to be developed in consultation with groups affected | To be defined through the engagement and consultation processes and be in place in advance of the zone going live in late 2020 | Ashley Beighton | FBC stage in January 2020 | |
| Specific impact on businesses, particularly small businesses | Targeted financial assistance for those who need it most to be developed in consultation with groups affected | To be defined through the engagement and consultation processes and be in place in advance of the zone going live in late 2020 | Ashley Beighton | FBC stage in January 2020 | |

5. Signed

Signed off by: Chris Major (Senior Responsible Project Officer)

Date: January 2020

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TRANSPORT ACT 2000

Bath Clean Air Zone Charging Order 2019

Made []

Coming into force *In accordance with articles 1 and 2*

ARRANGEMENT OF INSTRUMENT

THE ORDER

1. Citation and commencement
2. The Scheme

SCHEDULE TO THE ORDER

BATH CLEAN AIR ZONE CHARGING SCHEME

1. Interpretation
2. Designation of roads in respect of which charges are imposed
3. Relevant vehicles
4. Compliant vehicles
5. Non-chargeable vehicles
6. Emissions standards required of compliant vehicles
7. Imposition of charges
8. Amount of charge payable by purchase of a licence
9. Payment of charges
10. Register of compliant and non-chargeable vehicles
11. Penalty charge for non-payment of charge
12. Immobilisation of vehicles
13. Removal, storage and disposal of vehicles
14. Duration of scheme
15. Transitional provisions – temporary non-chargeable vehicles
16. Ten and five year plans for net proceeds

ANNEXES TO THE SCHEME

1. Deposited plans
2. Non-chargeable vehicles
3. Emissions standards for compliant vehicles
4. Transitional provisions – temporary non-chargeable vehicles
5. Part 1 – the Council's general plan for applying its share of the proceeds of this Scheme during the opening ten year period

Part 2 – The Council’s detailed programme for applying its share of the proceeds of this Scheme during the opening five year period

Whereas—

- (1) It appears to Bath and North East Somerset Council desirable, for the purposes of facilitating the achievement of Bath and North East Somerset Council’s and the West of England Combined Authority’s local transport policies, that it should make the following Order:
- (2) Appropriate persons have been consulted in accordance with section 170 of the Transport Act 2000:

Now, therefore, Bath and North East Somerset Council, in exercise of the powers conferred on it by Part III and Schedule 12 of the Transport Act 2000, Parts 2 and 6 of The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013, and of all other powers enabling it in that behalf, hereby makes the following Order:—

Citation and commencement

1. This Order is made on the [] day of [] [2019/20] and comes into force on the same day and may be cited as the “Bath Clean Air Zone Charging Order [2019/20]”.

The Scheme

2.—(1) The Scheme in the Schedule to this Order (“the Scheme”) has effect in accordance with paragraphs (2) and (3).

(2) The Scheme, other than article 7 of the Scheme, comes into force on [].

(3) Article 7 of the Scheme comes into force on [].

THE COMMON SEAL of
BATH AND NORTH EAST SOMERSET COUNCIL
was hereunto affixed in
the presence of:

- (u) “designated road” means one of the designated roads specified in article 2(2);
- (v) “electric vehicle” means a vehicle—
 - (i) that is an exempt vehicle for the purposes of the 1994 Act in accordance with paragraph 20G (electrically propelled vehicles) of Schedule 2 to that Act; or
 - (ii) that the Council is satisfied operates wholly by means of an electrically powered propulsion system that draws its motive power from either a hydrogen fuel cell or from a battery that can be fully recharged from an external source of electricity, and has tailpipe CO₂ emissions of 0 grams per kilometre;
- (w) “Enforcement Regulations” means the Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013;
- (x) “ESC test” means a test as described in section 2.12 of Annex I to Council Directive 88/77/EEC and carried out using the procedure described in Appendix 1, Annex III of that Directive;
- (y) “ETC test” means a test as described in section 2.14 of Annex I to Council Directive 88/77/EEC carried out using the procedure described in Appendices 2 and 3, Annex III of that Directive or a test carried out by means of a chassis dynamometer using a test cycle that the Council is satisfied replicates so far as practicable the standard ETC test cycle;
- (z) “Euro 4” means the emissions limit values set out in the rows corresponding with Category B in the first of the tables at section 5.3.1.4 of Annex I to Council Directive 70/220/EEC;
- (aa) “Euro 5” means the emissions limit values set out in Table 1 of Annex I to Commission Regulation 715/2007 of 20 June 2007;
- (bb) “Euro 6” means the emissions limit values set out in Table 2 of Annex I to Commission Regulation 715/2007 of 20 June 2007;
- (cc) “Euro IV” means the emissions limit values set out in Row B1 of Table 1 and Table 2 of section 6.2.1 of Annex I to Council Directive 88/77/EEC;
- (dd) “Euro V” means the emissions limit values set out in Row B2 of Table 1 and Table 2 of section 6.2.1 of Annex I to Council Directive 88/77/EEC;
- (ee) “Euro VI” means the emissions limit values set out in the table in Annex I to Commission Regulation 595/2009 of 18 June 2009;
- (ff) “hybrid vehicle” means a vehicle that operates partly by means of an electrically powered propulsion system that draws motive power from a battery and partly by means of an internal combustion engine;
- (gg) “licence” means a licence purchased under article 9;
- (hh) “local road” means any road in respect of which the Council is the local traffic authority;
- (ii) “maximum mass” in relation to a vehicle means the technically permissible maximum laden mass as specified by the manufacturer;
- (jj) “Payment Body” means any body charged with receiving road user charges made pursuant to clean air zone charging schemes and administering the Payment Portal;
- (kk) “Payment Portal” means any standardised payment system through which payment of road user charges in clean air zones will be administered;
- (ll) “non-chargeable vehicle” is to be construed in accordance with articles 5 and 15 and Annexes 2 and 4;
- (mm) “NO_x” means oxides of nitrogen;
- (nn) “penalty charge” and “penalty charge notice” have the meaning given in Regulation 2(1) of the Enforcement Regulations;
- (oo) “positive ignition engine” means an internal combustion engine in which combustion is initiated by a localised high temperature in the combustion chamber produced by energy supplied from a source external to the engine;

- (pp) “positive ignition vehicle” means a vehicle powered wholly by a positive ignition engine;
 - (qq) “private hire vehicle” has the meaning given in section 80 of the Local Government (Miscellaneous Provisions) Act 1976;
 - (rr) “reference mass” in relation to a vehicle means the mass of the vehicle with bodywork and, in the case of a towing vehicle, with coupling device, if fitted by the manufacturer, in running order, or mass of the chassis or chassis with cab, without bodywork and/or coupling device if the manufacturer does not fit the bodywork and/or coupling device (including liquids and tools, and spare wheel if fitted, and with the fuel tank filled to 90% and the other liquid containing systems, except those for used water, to 100% of the capacity specified by the manufacturer), increased by a uniform mass of 100 kilograms;
 - (ss) “register” means the register or registers of compliant and non-chargeable vehicles to be maintained by the Council and the Payment Body under article 10;
 - (tt) “registered keeper” means—
 - (i) in relation to a vehicle registered in the United Kingdom, the person in whose name the vehicle is registered under the 1994 Act; or
 - (ii) in relation to any other vehicle, the person by whom the vehicle is kept;
 - (uu) “relevant vehicle” has the meaning given by article 3;
 - (vv) “retrofitted” means adapted so as to meet the emissions standards required of a compliant vehicle—
 - (i) in accordance with an approved retrofit scheme; or
 - (ii) in such other manner as the Council is satisfied is of equivalent efficacy to an accredited retrofit scheme;
 - (ww) “taxi” means a vehicle licensed as a hackney carriage under the Town Police Clauses Act 1847 as amended;
 - (xx) “Type I test” means a test as described in section 5.3 of Annex I to Council Directive 70/220/EEC (test for simulating/verifying the average tailpipe emissions after a cold start) and carried out using the procedure described in Annex III of that Directive;
 - (yy) “Vehicle Classes Regulations” means the Road User Charging and Workplace Parking Levy (Classes of Motor Vehicles) (England) Regulations 2001;
 - (zz) “WHSC” means the World Harmonised Steady state Driving Cycle as defined in Regulation No. 49 of the Economic Commission for Europe of the United Nations;
 - (aaa) “WHTC” means the World Transient Steady state Driving cycle as defined in Regulation No. 49 of the Economic Commission for Europe of the United Nations;
 - (bbb) “working day” means any day other than a Saturday or Sunday, Christmas Day, Good Friday or a bank holiday in England and Wales under the Banking and Financial Dealings Act 1971.
- (2) In this Scheme—
- (a) a reference in any provision to an instrument of the European Community is to that instrument—
 - (i) as amended at the commencement date, if the instrument concerned is in force at that date; or,
 - (ii) as amended at the date of its repeal, if that instrument has been repealed before the commencement date;
 - (b) a reference in any provision to an authorised person is to a person authorised by the Council for the purposes of that provision and different persons may be authorised for the purposes of different provisions; and
 - (c) where a person has been authorised to act on behalf of the Council in relation to any matter a reference to the Council is taken to include a reference to that person.

Designation of roads in respect of which charges are imposed

- 2.—(1) Charges are imposed by this Scheme in respect of the designated roads.
(2) The designated roads are all local roads within the Clean Air Zone.

Relevant vehicles

- 3.—(1) A relevant vehicle is a vehicle of a Class and type specified in paragraph (2) that is not—
(a) a compliant vehicle; or
(b) a non-chargeable vehicle.
(2) The vehicles specified for the purpose of paragraph (1) are—
(a) taxis and private hire vehicles of Class M₁; and
(b) all vehicles of Class M₂, Class M₃, Class N₁, Class N₂ and Class N₃.

Compliant vehicles

4. A vehicle is a compliant vehicle if—
(a) the vehicle meets the standards required of a compliant vehicle for the purposes of this Scheme; and
(b) particulars of the vehicle are for the time being entered in the register.

Non-chargeable vehicles

5. Annex 2 to this Scheme, which specifies categories of non-chargeable vehicles, has effect.

Emissions standards required of compliant vehicles

6. A vehicle meets the standards required of a compliant vehicle for the purposes of this Scheme if the Council is satisfied that the vehicle is—
(a) an electric vehicle;
(b) a hybrid vehicle;
(c) an alternative fuel vehicle;
(d) a positive ignition vehicle that meets the standards specified for that vehicle in Table 1 of Annex 3 (Euro 4/IV Standards For Positive Ignition Vehicles); or
(e) a compression ignition vehicle that meets the standards specified for that vehicle in Table 2 of Annex 3 (Euro 6/VI Standards For Compression Ignition Vehicles).

Imposition of charges

- 7.—(1) Subject to the following provisions of this Scheme, a charge of an amount specified in article 8(1) is imposed in respect of any relevant vehicle of Class M₃, Class N₂ or Class N₃, for each charging day on which it is at any time used on one or more designated roads.
(2) Subject to the following provisions of this Scheme, a charge of an amount specified in article 8(2) is imposed in respect of any relevant vehicle of Class M₁, Class M₂ or Class N₁ for each charging day on which it is at any time used on one or more designated roads.

Amount of charge payable by purchase of a licence

- 8.—(1) The amount of a charge imposed by article 7(1) is £100 per charging day.
(2) The amount of a charge imposed by article 7(2) is £9 per charging day.

Payment of charges

9.—(1) A charge imposed by article 7 must be paid by the purchase of a licence in accordance with the provisions of this article.

(2) A licence must be issued in respect of a particular vehicle and for a single charging day.

(3) A vehicle referred to in paragraph (2) must be identified by its registration mark, and—

- (a) the purchaser of a licence must specify the registration mark of the vehicle in respect of which that charge is paid;
- (b) a licence will not be valid in respect of any vehicle having a registration mark different from the mark so specified.

(4) A licence may only be purchased—

- (a) on the charging day concerned;
- (b) on the next working day following that charging day; or
- (c) on a day falling within such period of days immediately preceding that charging day as the Council may specify on its website.

(5) Charges imposed by this Scheme must be paid by such means as the Council may, in accordance with the requirements of the Payment Portal, specify on its website as being acceptable.

(6) Where a licence is purchased otherwise than in cash and payment is not received (whether because a cheque is dishonoured, a direct debit, credit card or debit card payment is declined, or otherwise) before the end of the next working day following the charging day to which the licence relates, the charge to which the licence relates will be treated as not paid and the licence will be void.

Register of compliant and non-chargeable vehicles

10.—(1) The Council and the Payment Body will maintain one or more registers which will together identify compliant vehicles and non-chargeable vehicles (“the register”) for the purposes of articles 4 and 5 and Annexes 2 and 4 which require particulars of such vehicles to be entered in the register.

(2) An application to enter particulars of a vehicle on the register—

- (a) must include all such information as the Council or the Payment Body may reasonably require; and
- (b) must be made by such means as the Council or the Payment Body may accept.

(3) If the Council or the Payment Body is satisfied that a vehicle—

- (a) complies with the standards required of a compliant vehicle; or
- (b) falls within a class of non-chargeable vehicle,

it will enter particulars of the vehicle in the register.

(4) If the Council or the Payment Body is satisfied that a vehicle, particulars of which are entered in the register, no longer—

- (a) complies with the standards required of a compliant vehicle; or
- (b) falls within a class of non-chargeable vehicle,

it may remove the particulars of the vehicle from the register.

(5) Where the registered keeper of such a vehicle is aware that the vehicle has ceased or will cease to—

- (a) comply with the standards required of a compliant vehicle; or
- (b) fall within a class of non-chargeable vehicle,

the registered keeper must notify the Council or the Payment Body of the fact and the Council or the Payment Body may remove the particulars of the vehicle from the register forthwith, or from

the date notified to the Council or the Payment Body as the date on which it will cease to be such a vehicle.

(6) Nothing in this article prevents the making of a new application under paragraph (2) for particulars of a vehicle to be entered in the register after they have been removed from it in accordance with any provision of this article.

Penalty charge for non-payment of charge

11.—(1) A penalty charge will be payable, in addition to the charge imposed under article 7, for each charging day on which—

- (a) a relevant vehicle has been used on a designated road in circumstances in which a charge is imposed by article 7;
- (b) that charge has not been paid in full in the manner in which and within the time by which it is required to be paid by article 9.

(2) A penalty charge payable by virtue of paragraph (1) must be paid within the period (“the payment period”) of 28 days beginning with the date on which a penalty charge notice is served under regulation 7 of the Enforcement Regulations and in a manner specified in the penalty charge notice.

(3) The amount of a penalty charge payable in accordance with paragraph (1) is £120 but, if the penalty charge is paid before the end of the fourteenth day of the payment period, the amount will be reduced by one half to £60.

(4) Where a charge certificate is issued in accordance with regulation 17(1) of the Enforcement Regulations, the amount of the penalty charge to which it relates will be increased by one half to £180.

Immobilisation of vehicles

12.—(1) Provided that—

- (a) none of the circumstances in paragraph (2) of Regulation 25 of the Enforcement Regulations apply; and
 - (b) the conditions in paragraph (3) of that Regulation apply,
- an authorised person may immobilise a vehicle in accordance with paragraphs (4) and (5) of that Regulation.

(2) A vehicle to which an immobilisation device has been fixed in accordance with the provisions of this Scheme—

- (a) may be released only by or under the direction of an authorised person; and
- (b) subject to paragraph (a), will be released—
 - (i) if all outstanding charges under article 7 are paid;
 - (ii) if all outstanding penalty charges are paid; and
 - (iii) if a penalty charge of £70 for the release of the vehicle from the immobilisation device is so paid.

Removal, storage and disposal of vehicles

13.—(1) Provided Regulation 27(1)(a) or (b) of the Enforcement Regulations is satisfied, an authorised person may remove a vehicle and deliver it to a custodian for storage.

(2) The custodian may dispose of the vehicle and its contents in the circumstances described in, and subject to the provisions of, Regulation 28 of the Enforcement Regulations.

(3) Where a vehicle has been removed and delivered into the custody of a custodian in accordance with paragraph (1) the Council or the custodian may (whether or not any claim is made under Regulation 30 or 31 of the Enforcement Regulations) recover from the person who was the keeper of the vehicle when the vehicle was removed—

- (a) all outstanding charges under article 7;
- (b) all penalty charges that are outstanding in relation to the vehicle;
- (c) a penalty charge of £200 for its removal;
- (d) a penalty charge of £40 for each complete day or part of a day on which it has been held by the Council or a custodian; and
- (e) if the vehicle has been disposed of, a penalty charge of £70 for its disposal.

Duration of scheme

14. This Scheme will remain in force indefinitely.

Transitional provisions – temporary non-chargeable vehicles

15. Annex 4 to this Scheme which contains transitional provisions specifying classes of temporary non-chargeable vehicles has effect.

Ten and five year plans for net proceeds

16.—(1) Part 1 of Annex 5 to this Scheme constitutes the general plan, under paragraph 10(1)(a) of Schedule 12 to the Transport Act 2000, for the application of the Council's share of the net proceeds of this Scheme during the opening ten year period.

(2) Part 2 of Annex 5 to this Scheme constitutes the detailed programme, under paragraph 10(1)(b) of Schedule 12 to the Transport Act 2000, for the application of the Council's share of the net proceeds of this Scheme during the opening five year period.

ANNEX 1 TO THE SCHEME
DEPOSITED PLANS

Article 1(1)

PART 1 – CLEAN AIR ZONE PLAN

| <i>(a)</i> <i>Title & Sheet No.</i> | <i>(b)</i> <i>Drawing Number</i> | <i>(c)</i> <i>Revision</i> |
|--|-------------------------------------|-------------------------------|
| Bath Clean Air Zone, Overview | 674726.BR.042.01-CH-DR-0050 | P01 |

PART 2 – CLEAN AIR ZONE BOUNDARY PLANS

| <i>(a)</i> <i>Title & Sheet No.</i> | <i>(b)</i> <i>Drawing Number</i> | <i>(c)</i> <i>Revision</i> |
|--|-------------------------------------|-------------------------------|
| Bath Clean Air Zone, Sheet 1 | 674726.BR.042.01-CH-DR-0051 | P01 |
| Bath Clean Air Zone, Sheet 2 | 674726.BR.042.01-CH-DR-0052 | P01 |
| Bath Clean Air Zone, Sheet 3 | 674726.BR.042.01-CH-DR-0053 | P01 |
| Bath Clean Air Zone, Sheet 4 | 674726.BR.042.01-CH-DR-0054 | P01 |
| Bath Clean Air Zone, Sheet 5 | 674726.BR.042.01-CH-DR-0055 | P01 |
| Bath Clean Air Zone, Sheet 6 | 674726.BR.042.01-CH-DR-0056 | P01 |
| Bath Clean Air Zone, Sheet 7 | 674726.BR.042.01-CH-DR-0057 | P01 |
| Bath Clean Air Zone, Sheet 8 | 674726.BR.042.01-CH-DR-0058 | P01 |
| Bath Clean Air Zone, Sheet 9 | 674726.BR.042.01-CH-DR-0059 | P01 |
| Bath Clean Air Zone, Sheet 10 | 674726.BR.042.01-CH-DR-0060 | P01 |
| Bath Clean Air Zone, Sheet 11 | 674726.BR.042.01-CH-DR-0061 | P01 |
| Bath Clean Air Zone, Sheet 12 | 674726.BR.042.01-CH-DR-0062 | P01 |
| Bath Clean Air Zone, Sheet 13 | 674726.BR.042.01-CH-DR-0063 | P01 |

NON-CHARGEABLE VEHICLES

Historic Vehicles

1. A vehicle is a non-chargeable vehicle if—
- (a) it is an exempt vehicle for the purposes of the 1994 Act in accordance with paragraph 1A(1) of Schedule 2 to that Act; or
 - (b) in respect of a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom, the Council is satisfied that, had it been registered under the 1994 Act, it would have been treated as an exempt vehicle in accordance with paragraph 1A(1) of Schedule 2 to the 1994 Act, and particulars of the vehicle are for the time being entered in the register.

Military vehicles

- 2.—(1) A vehicle is a non-chargeable vehicle if—
- (a) it belongs to any of Her Majesty's forces or is in use for the purposes of any of those forces; or
 - (b) the Council is satisfied the vehicle is used for naval, military or air force purposes and not registered under the 1994 Act, while it is being used on a road by a member of a visiting force or a member of a headquarters or organisation,
- and particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph “member of a visiting force” and “member of a headquarters or organisation” have the meaning given in paragraph 1(2) of Schedule 5 to the Road Vehicles (Registration and Licensing) Regulations 2002.

Agricultural and similar vehicles

3.—(1) A vehicle which is an exempt vehicle for the purposes of the 1994 Act by virtue of it falling within any of the following paragraphs of Schedule 2 to that Act is a non-chargeable vehicle—

- (a) paragraph 20A (vehicles used between different parts of land);
- (b) paragraphs 20B, 20C and 20D (tractors and certain agricultural vehicles);
- (c) paragraphs 20E (mowing machines);
- (d) paragraph 20F (steam powered vehicles);
- (e) paragraph 20H (snow ploughs); and
- (f) paragraph 20J (gritters).

(2) If the Council is satisfied that a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom had been registered under the 1994 Act, it would have fallen within sub-paragraph (1), that vehicle is a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

Disabled vehicles

4.—(1) A vehicle which is an exempt vehicle for the purposes of the 1994 Act by virtue of it falling within paragraphs 19 or 20 (vehicles for disabled people) of Schedule 2 to that Act is a non-chargeable vehicle.

(2) If the Council is satisfied that a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom had been registered under the 1994 Act, it

would have fallen within paragraph (1), that vehicle is a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

Health service vehicles

5.—(1) A vehicle which is an exempt vehicle for the purposes of the 1994 Act by virtue of it falling within paragraphs 7 or 8 (health service vehicles) of Schedule 2 to that Act is a non-chargeable vehicle.

(1) If the Council is satisfied that a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom had been registered under the 1994 Act, it would have fallen within paragraph (1), that vehicle is a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

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EMISSIONS STANDARDS FOR COMPLIANT VEHICLES

1.—(1) A vehicle meets the standards set out in Tables 1 and 2 if the Council is satisfied that—

- (a) the vehicle is certified by the appropriate national approval authority as having been manufactured to satisfy the EC emissions standard specified for that vehicle in column (e) of the Table;
- (b) the vehicle has been retrofitted so that the limit values for the emission of NO_x specified for the vehicle in column (f) would not be exceeded during the appropriate test or tests specified in column (g) of the Table; or
- (c) in respect of all other vehicles, the Council is satisfied that the limit values for the emission of NO_x specified for the vehicle in column (f) would not be exceeded during the appropriate test or tests specified in column (g) of the Table.

(2) The Council will be satisfied that the vehicle has been retrofitted to meet the limit values referred to in paragraph (1)(b) if that vehicle has been certified as having been retrofitted in accordance with an approved retrofit scheme.

Table 1 — EURO 4/IV STANDARDS FOR POSITIVE IGNITION VEHICLES

| (a) Row No. | (b) Vehicle Class | (c) Maximum mass of vehicle, where relevant (kg) | (d) Reference mass of vehicle, where relevant (kg) | (e) EC emissions standard | (f) Limit values for NO _x | (g) Appropriate test |
|-------------------|-------------------------|--|--|------------------------------------|--|----------------------------|
| (1) | M ₁ | not exceeding 2,500 | | Euro 4 | 0.08g/km | Type I |
| (2) | M ₁ | exceeding 2,500 | not exceeding 1,305 | Euro 4 | 0.08g/km | Type I |
| (3) | M ₁ | exceeding 2,500 | exceeding 1,305 and not exceeding 1,760 | Euro 4 | 0.10g/km | Type I |
| (4) | M ₁ | exceeding 2,500 | exceeding 1,760 | Euro 4 | 0.11g/km | Type I |
| (5) | M ₂ | not exceeding 2,500 | | Euro 4 | 0.08g/km | Type I |
| (6) | M ₂ | exceeding 2,500 and not exceeding 3,500 | exceeding 1,305 and not exceeding 1,760 | Euro 4 | 0.10g/km | Type I |
| (7) | M ₂ | exceeding 2,500 and not exceeding 3,500 | exceeding 1,760 | Euro 4 | 0.11g/km | Type I |
| (8a) | M ₂ | exceeding 3,500 | not exceeding 2,840 | Euro 4 | 0.11g/km | Type I |
| (8b) | M ₂ | exceeding 3,500 | not exceeding 2,840 | Euro IV | 3.5g/kWh | ETC |
| (9) | M ₂ | exceeding 3,500 | exceeding 2,840 | Euro IV | 3.5g/kWh | ETC |

| | | | | | | |
|-------|---------------------------------|--|---|---------|----------|--------|
| (10) | N ₁ sub-class (i) | | not exceeding 1,350 | Euro 4 | 0.08g/km | Type I |
| (11) | N ₁ sub-class (ii) | | exceeding 1,305 and not exceeding 1,760 | Euro 4 | 0.10g/km | Type I |
| (12) | N ₁ sub-class (iii) | | exceeding 1,760 | Euro 4 | 0.11g/km | Type 1 |
| (13a) | N ₂ | | not exceeding 2,840 | Euro 4 | 0.11g/km | Type I |
| (13b) | N ₂ | | not exceeding 2,840 | Euro IV | 3.5g/kWh | ETC |
| (14) | N ₂ | | exceeding 2,840 | Euro IV | 3.5g/kWh | ETC |
| (15) | M ₃ , N ₃ | | | Euro IV | 3.5g/kWh | ETC |

Table 2 — EURO 6/VI STANDARDS FOR COMPRESSION IGNITION VEHICLES

| (a) Row No. | (b) Vehicle Class | (c) Maximum mass of vehicle, where relevant(kg) | (d) Reference mass of vehicle, where relevant (kg) | (e) EC emissions standard | (f) Limit values for NO _x | (g) Appropriate tests |
|----------------|---------------------------------|--|---|------------------------------|---|--------------------------|
| (1) | M ₁ | | not exceeding 2610 | Euro 6 | 0.08g/km | Type I |
| (2) | M ₁ | | exceeding 2610 | Euro VI | 0.4 g/kWh (WHSC) and 0.46 g/kWh (WHTC) | WHSC and WHTC |
| (3) | M ₂ | | not exceeding 2610 | Euro 6 | 0.125g/km | Type I |
| (4) | M ₂ | | exceeding 2610 | Euro VI | 0.4 g/kWh (WHSC) and 0.46 g/kWh (WHTC) | WHSC and WHTC |
| (5) | M ₃ , N ₃ | | | Euro VI | 0.4 g/kWh (WHSC) and 0.46 g/kWh (WHTC) | WHSC and WHTC |
| (6) | N ₁ | | not exceeding 1,350 | Euro 6 | 0.08g/km | Type I |
| (7) | N ₁ sub-class (ii) | | exceeding 1,305 and not exceeding 1,760 | Euro 6 | 0.105g/km | Type I |
| (8) | N ₁ sub-class (iii) | | exceeding 1,760 | Euro 6 | 0.125g/km | Type 1 |
| (9) | N ₂ | | not exceeding 2610 | Euro 6 | 0.125g/km | Type I |
| (10) | N ₂ | | exceeding 2610 | Euro VI | 0.4 g/kWh (WHSC) and 0.46 g/kWh (WHTC) | WHSC and WHTC |

TRANSITIONAL PROVISIONS –
TEMPORARY NON-CHARGEABLE VEHICLES**Emergency service vehicles**

1.—(1) During the emergency service vehicles transitional period the Council will treat any qualifying emergency service vehicle as if it were a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

- (1) A vehicle is a qualifying emergency service vehicle if—
- (a) it is a non-chargeable vehicle for the purposes of the 1994 Act by virtue of it falling within any of the following paragraphs of Schedule 2 to that Act is a non-chargeable vehicle—
 - (i) paragraph 3A (police vehicles);
 - (ii) paragraphs 4 and 5 (fire engines etc.);
 - (iii) paragraphs 6 and 7 (ambulances and health service vehicles);
 - (iv) paragraph 10 (mine rescue vehicles);
 - (v) paragraph 11 (lifeboat vehicles); or
 - (b) in respect of a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom, the Council is satisfied that, had it been registered under the 1994 Act, it would have fallen within sub-paragraph (a).

(2) In this paragraph “emergency service vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

Vehicles supporting the emergency services

2.—(1) During the emergency service support vehicles transitional period the Council will treat any qualifying emergency service support vehicle as if it were a non-chargeable vehicle.

- (2) A vehicle is a qualifying emergency service support vehicle on any charging day if—
- (a) it is an emergency service support vehicle that has been specified by the Council pursuant to an application under sub-paragraph (3);
 - (b) the Council is satisfied that on the charging day concerned it was used in relation to an emergency incident; and
 - (c) particulars of the vehicle are entered in the register on the charging day concerned or the next working day following that charging day.

(3) An eligible person may apply to the Council to specify a vehicle as an emergency service support vehicle for any charging day or days and, subject to sub-paragraph (4), to specify a different vehicle in place of a specified vehicle.

(4) Unless a vehicle has been specified pursuant to an application under sub-paragraph (3) for a particular charging day or days, it remains specified for all charging days until a different vehicle has been specified in place of it.

(5) An application under sub-paragraph (3) shall be made by such means as the Council may accept and be accompanied by such information as the Council may reasonably require.

(6) An application to enter particulars of an emergency service support vehicle on the register pursuant to sub-paragraph (2)(c) shall—

- (a) be made by such means as the Council may specify on its website; and

- (b) be accompanied by such details of the emergency incident and the use of the emergency service support vehicle to which the application relates as the Council may reasonably require.
- (7) In this paragraph—
- (a) “eligible person” means any person who the Council is satisfied works for or acts on behalf of a voluntary organisation working to support a specified emergency service provider during emergency incidents;
 - (b) “emergency service support vehicle” means a vehicle used by an eligible person for the purpose of supporting a specified emergency service provider during emergency incidents;
 - (c) “emergency service support vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024;
 - (d) “specified emergency service provider” means—
 - (i) Avon Fire and Rescue Service;
 - (ii) Avon and Somerset Police; and
 - (iii) South Western Ambulance Service.

Blue badge holders

3.—(1) During the blue badge transitional period the Council will treat any qualifying blue badge vehicle as if it were a non-chargeable vehicle.

- (2) A vehicle is a qualifying blue badge vehicle on any charging day if—
- (a) it has been specified by the Council pursuant to an application under sub-paragraph (3) or (4);
 - (b) it is a compression ignition vehicle that the Council is satisfied meets the emissions standards for temporary non-chargeable vehicles set out in paragraph 13 of this Annex;
 - (c) it is being used for the transport of a disabled person and has a blue badge displayed in compliance with regulation 12 and regulation 13, 14, 15 or 16 of the Disabled Persons (Badges for Motor Vehicles)(England) Regulations 2000; and
 - (d) particulars of the vehicle are entered in the register on the charging day concerned or the next working day following that charging day.

(3) An eligible person may apply to the Council to specify a vehicle in relation to the blue badge held by that person for any charging day or days and, subject to sub-paragraph (5), to specify a different vehicle in place of a specified vehicle.

(4) An eligible organisation may apply to the Council to specify a vehicle in relation to any blue badge held by that organisation for any charging day or days and, subject to sub-paragraph (5), to specify a different vehicle in place of a specified vehicle.

(5) Unless a vehicle has been specified pursuant to an application under sub-paragraph (3) or (4) for a particular charging day or days, it remains specified for all charging days until a different vehicle has been specified in place of it.

(6) An application under sub-paragraphs (3) or (4) shall be made by such means as the Council may accept and be accompanied by such information as the Council may reasonably require.

- (7) In this paragraph—
- (a) “blue badge” means any badge issued to an individual or institution under section 21 of the Chronically Sick and Disabled Persons Act 1970 or under section 14 of the Chronically Sick and Disabled Persons (Northern Ireland) Act 1978;
 - (b) “blue badge transitional period” means the period beginning with the commencement date and ending on 31 December 2022;
 - (c) “eligible organisation” means any organisation issued with and holding a valid blue badge; and

- (d) “eligible person” means any person issued with and holding a valid blue badge.

Community transport vehicles

4.—(1) During the community transport vehicles transitional period the Council will treat any vehicle that is a qualifying community transport vehicle and that does not fall within paragraphs 1 to 5 of Annex 2 as if it were a non-chargeable vehicle.

(2) A vehicle is a qualifying community transport vehicle on any charging day if—

- (a) it has been specified by the Council pursuant to an application under sub-paragraph (3);
- (b) it is being used pursuant to a community transport permit;
- (c) it is a compression ignition vehicle that the Council is satisfied meets the emissions standards for temporary non-chargeable vehicles set out in paragraph 13 of this Annex; and
- (d) particulars of the vehicle are entered in the register on the charging day concerned or the next working day following that charging day.

(3) A holder of a community transport permit may apply to the Council to specify a vehicle in relation to that permit for any charging day or days and, subject to sub-paragraph (4), to specify a different vehicle in place of a specified vehicle.

(4) Unless a vehicle has been specified pursuant to an application under sub-paragraph (3) for a particular charging day or days, it remains specified for all charging days until a different vehicle has been specified in place of it.

(5) An application under sub-paragraph (3) shall be made by such means as the Council may accept and be accompanied by such information as the Council may reasonably require.

(6) In this paragraph—

- (a) “community transport permit” means a permit granted under section 19(3), 19(4), 19(5) or 22(2) of the Transport Act 1985; and
- (b) “community transport vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2022.

Vehicles used by registered healthcare providers

5.—(1) During the healthcare providers transitional period the Council will treat any qualifying healthcare provider’s vehicle as if it were a non-chargeable vehicle.

(2) A vehicle is a qualifying healthcare provider’s vehicle on any charging day if—

- (a) it has been specified by the Council pursuant to an application under sub-paragraph (3);
- (b) it is a compression ignition vehicle that the Council is satisfied meets the emissions standards for temporary non-chargeable vehicles set out in paragraph 13 of this Annex;
- (c) the Council is satisfied it is used on that charging day—
 - (i) for the purposes of undertaking a regulated healthcare activity; and
 - (ii) by or on behalf of a registered healthcare provider; and
- (d) particulars of the vehicle are entered in the register on the charging day concerned or the next working day following that charging day.

(3) A registered healthcare provider may apply to the Council to specify a vehicle as a healthcare provider’s vehicle for any charging day or days and, subject to sub-paragraph (4), to specify a different vehicle in place of a specified vehicle.

(4) Unless a vehicle has been specified pursuant to an application under sub-paragraph (3) for a particular charging day or days, it remains specified for all charging days until a different vehicle has been specified in place of it.

(5) In this paragraph—

- (a) “healthcare providers transitional period” means the period beginning with the commencement date and ending on 31 December 2022;
- (b) “registered healthcare provider” means a person registered as a service provider under part 1 of the Health and Social Care Act 2008;
- (c) “regulated healthcare activity” means any activity specified in Schedule 1 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

Wheelchair-accessible taxis and private hire vehicles

6.—(1) During the wheelchair-accessible vehicles transitional period the Council will treat any qualifying wheelchair-accessible taxi or private hire vehicle as if it were a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) A vehicle is a qualifying wheelchair-accessible taxi or private hire vehicle if—

- (a) it appears on a list of vehicles maintained under section 167(1) of the Equality Act 2010; and
- (b) it is a compression ignition vehicle that the Council is satisfied meets the emissions standards for temporary non-chargeable vehicles set out in paragraph 13 of this Annex.

(3) In this paragraph “wheelchair-accessible vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2022.

Commercial vehicles granted a temporary exemption under the Business Assistance Scheme

7.—(1) During the Business Assistance Scheme transitional period the Council will treat a qualifying commercial vehicle as if it were a non-chargeable vehicle.

(2) A vehicle is a qualifying commercial vehicle on any charging day if—

- (a) it has been specified by the Council under sub-paragraph (3) pursuant to an application under sub-paragraph (4);
- (b) it is a compression ignition vehicle that the Council is satisfied meets the emissions standards for temporary non-chargeable vehicles set out in paragraph 13 of this Annex; and
- (c) particulars of the vehicle are entered in the register on the charging day concerned or the next working day following that charging day.

(3) The Council shall specify a vehicle for the purpose of sub-paragraph (2)(a) if it is satisfied that—

- (i) the vehicle concerned has been the subject of an unsuccessful application to the Business Assistance Scheme for funding for the replacement of that vehicle with a compliant vehicle;
- (ii) pursuant to a successful application to the Business Assistance Scheme an order has been placed for the purchase of a compliant vehicle to replace the vehicle concerned but the replacement vehicle has not yet been made available for use; or
- (iii) pursuant to a successful application to the Business Assistance Scheme an order has been placed for the vehicle concerned to be retrofitted but the retrofitting has not yet been completed.

(4) An application to the Council to specify a vehicle must—

- (a) include such evidence—
 - (i) of the unsuccessful application to the Business Assistance Scheme for replacement of the vehicle concerned;
 - (ii) that a replacement compliant vehicle has been ordered;
 - (iii) that the an order has been placed for the vehicle to be retrofitted;
 - (iv) of the relevant replacement date;

as the Council may reasonably require; and

(b) be made by such means as the Council may accept.

(5) In this paragraph—

(a) “Business Assistance Scheme” means the “Pre-Euro 6 Business Assistance Scheme” as set out on the Council’s website and as may be amended from time to time;

(b) “Business Assistance Scheme transitional period” means the period beginning with the commencement date and ending on the earlier of—

(i) the replacement date; and

(ii) 31 December 2022;

(c) “replacement date” means the date specified in any application under sub-paragraph (4) as the date on which either—

(i) a replacement compliant vehicle is to be provided for use in replacement of the qualifying commercial vehicle; or

(ii) the retrofitting of the qualifying commercial vehicle is to be completed.

Recovery vehicles

8.—(1) During the recovery vehicles transitional period the Council will treat any qualifying recovery vehicle as if it were a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph—

(a) “qualifying recovery vehicle” means—

(i) a vehicle licensed as a recovery vehicle under paragraph 5 of Schedule 1 to the 1994 Act; or

(ii) a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom in respect of which the Council is satisfied that, had it been registered under the 1994 Act, it would have fallen to be licensed as a recovery vehicle under paragraph 5 of Schedule 1 to the 1994 Act;

(b) “qualifying recovery vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

Showman’s vehicles

9.—(1) During the showman’s vehicles transitional period the Council will treat any showman’s vehicle as a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph—

(a) “showman’s vehicle” means any vehicle that—

(i) is registered under the 1994 Act and is a “showman’s vehicle” or “showman’s goods vehicle” within the meaning of section 62 of the 1994 Act; or

(ii) is registered in a country other than the United Kingdom, in accordance with that country’s rules governing the registration of such vehicles, in the name of a person following the business of a travelling showman and used solely by that person for the purposes of his business and no other purpose;

(b) “showman’s vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

Special vehicles

10.—(1) During the special vehicles transitional period the Council will treat any special vehicle as a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph—

- (a) “special vehicle” means—
 - (i) a vehicle registered under the 1994 Act that falls to be treated as a “special vehicle” within the meaning of Part IV of Schedule 1 to the 1994 Act; or
 - (ii) a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom in respect of which the Council is satisfied that, had it been registered under the 1994 Act, it would have fallen to be treated as a “special vehicle” within the meaning of Part IV of Schedule 1 to the 1994 Act;
- (b) “special vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

Special type vehicles

11.—(1) During the special type vehicles transitional period the Council will treat any special type vehicle as a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph—

- (a) “special type vehicle” means a vehicle of a type specified in an Order under section 44 of the Road Traffic Act 1988; and
- (a) “special type vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

General haulage vehicles

12.—(1) During the general haulage vehicles transitional period the Council will treat any general haulage vehicle as a non-chargeable vehicle provided particulars of the vehicle are for the time being entered in the register.

(2) In this paragraph—

- (a) “general haulage vehicle” means—
 - (i) a vehicle registered under the 1994 Act that falls to be treated as a “haulage vehicle” within the meaning of paragraph 7 of Schedule 1 to the 1994 Act; or
 - (ii) a vehicle registered under legislation relating to the registration of vehicles in a country other than the United Kingdom in respect of which the Council is satisfied that, had it been registered under the 1994 Act, it would have fallen to be treated as a “haulage vehicle” within the meaning of paragraph 7 of Schedule 1 to the 1994 Act;
- (b) “general haulage vehicles transitional period” means the period beginning with the commencement date and ending on 31 December 2024.

Emissions standards for temporary non-chargeable vehicles

13.—(1) A vehicle meets the standards required of a temporary non chargeable vehicle if the Council is satisfied that—

- (a) the vehicle is certified by the appropriate national approval authority as having been manufactured to satisfy the Euro 4, Euro IV, Euro 5 or Euro V emissions standards;
- (b) the vehicle has been retrofitted so that the limit values for the emission of NO_x specified for the vehicle in column (e) would not be exceeded during the appropriate test or tests specified in column (f) of Table A; or

- (c) in respect of all other vehicles, the Council is satisfied that the limit values for the emission of NO_x specified for the vehicle in column (e) would not be exceeded during the appropriate test or tests specified in column (f) of Table A.

(2) The Council will be satisfied that the vehicle has been retrofitted to meet the limit values referred to in paragraph (1)(b) if that vehicle has been certified as having been retrofitted in accordance with an approved retrofit scheme.

Table A — EURO 4/IV LIMIT VALUES FOR COMPRESSION IGNITION VEHICLES

| (a) Row No. | (b) Vehicle Class | (c) Maximum mass of vehicle, where relevant (kg) | (d) Reference mass of vehicle, where relevant (kg) | (e) Limit values for NO _x | (f) Appropriate tests |
|----------------|---------------------------------|---|---|---|--------------------------|
| (1) | M ₁ | not exceeding 2,500 | | 0.25g/km | Type I |
| (2) | M ₁ | exceeding 2,500 | not exceeding 1,305 | 0.25g/km | Type I |
| (3) | M ₁ | exceeding 2,500 | exceeding 1,305 and not exceeding 1,760 | 0.33g/km | Type I |
| (4) | M ₁ | exceeding 2,500 | exceeding 1,760 | 0.39g/km | Type I |
| (5) | M ₂ | not exceeding 2,500 | | 0.25g/km | Type I |
| (6) | M ₂ | exceeding 2,500 and not exceeding 3,500 | exceeding 1,305 and not exceeding 1,760 | 0.33g/km | Type I |
| (7) | M ₂ | exceeding 2,500 and not exceeding 3,500 | exceeding 1,760 | 0.39g/km | Type I |
| (8a) | M ₂ | exceeding 3,500 | not exceeding 2,840 | 0.39g/km | Type I |
| (8b) | M ₂ | exceeding 3,500 | not exceeding 2,840 | 3.5g/kWh | ESC / ETC |
| (9) | M ₂ | exceeding 3,500 | exceeding 2,840 | 3.5g/kWh | ESC / ETC |
| (10) | M ₃ , N ₃ | | | 3.5g/kWh | ESC / ETC |
| (11) | N ₁ sub-class (i) | | not exceeding 1,350 | 0.25g/km | Type I |
| (12) | N ₁ sub-class (ii) | | exceeding 1,305 and not exceeding 1,760 | 0.33g/km | Type I |
| (13) | N ₁ sub-class (iii) | | exceeding 1,760 | 0.39g/km | Type I |
| (14a) | N ₂ | | not exceeding 2,840 | 0.39g/km | Type I |

| | | | | | |
|-------|----------------|--|---------------------|----------|-----------|
| (14b) | N ₂ | | not exceeding 2,840 | 3.5g/kWh | ESC & ETC |
| (15) | N ₂ | | exceeding 2,840 | 3.5g/kWh | ESC & ETC |

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PART 2 –
THE COUNCIL'S DETAILED PROGRAMME FOR APPLYING ITS SHARE OF THE
PROCEEDS OF THIS SCHEME DURING THE OPENING FIVE YEAR PERIOD

It is proposed that the Scheme would commence on []. This plan therefore covers the five-year period from [] to [].

As set out in Part 1 of this Annex, it is not anticipated that the proposed Scheme would generate substantial net revenues. The Council's detailed plan for applying any net proceeds during this period would therefore depend to a large extent on:

- the level of net proceeds generated;
- the progress made towards meeting the required limit values for NO₂;
- to what extent the Scheme has impacted on the affected groups identified in the Equalities Impact Assessment for the Scheme;
- to what extent the proposed improvements have already been implemented by other means.

Given these uncertainties the Council intends to form a Revenue Reinvestment Reserve Steering Group comprised of councillors, senior officers and representatives from relevant business and other key interest groups to review and prioritise the proposed improvements and make recommendations to the Project Board for approval.

These improvements could include:

- enhancing the non-charging measures already being funded by the Government's Implementation Fund and Clean Air Fund;
- enhancing the monitoring and evaluation of the Scheme (and implementing the 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;
- maintaining and enhancing the public electric vehicle charge point network;
- supporting and enhancing sharing schemes such as the electric cycle hire scheme and car and van club network;
- 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 the development of a mobility as a service (MaaS) platform; and
- related research and policy development.

| Bath & North East Somerset Council | | |
|---|---|-----------------------------------|
| DECISION MAKER: | Cabinet | |
| MEETING DATE: | 16th January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3177 |
| TITLE: | Review of the B&NES Local Development Scheme (LDS) | |
| WARD: | All | |
| AN OPEN PUBLIC ITEM | | |
| List of attachments to this report: | | |
| None | | |

1 THE ISSUE

1.1 This report seeks the agreement of Cabinet to delegate authority to officers to revise the Bath & North East Somerset Local Development Scheme (LDS) in order to establish the priorities for the preparation of Planning Policy documents for the period 2020-2023 and enable a review of the Council’s planning policies to respond to the Climate and Nature emergency.

2 RECOMMENDATION

2.1 Cabinet is asked to;

- a) Agree the key priorities for the preparation and review of Planning Policies in B&NES as summarised in para 3.2 of this report, and
- b) Delegate to the Director of Development and Public Protection (in consultation with the Cabinet Member for Housing, Planning, and Economic Development) the task of preparing a revised Local Development Scheme to reflect those priorities. The revised scheme would then be presented to Cabinet at a subsequent meeting for consideration with a view to bringing it into effect.

3 THE REPORT

3.1 The LDS sets out the programme for the preparation and review of the Council's planning policy framework over the next three years to 2023. The LDS was last updated in February 2019 but a change in circumstances warrants the current review. The key changes needed to the LDS are described below and delegation is sought to set these out in more detail in a revised LDS.

3.2 Key changes in the Local development scheme entail;

(1) Sub-Regional Planning and strategies

- a) The withdrawal of the JSP will require the preparation of a new sub-regional planning framework which will set the context for the review of B&NES planning policies. The arrangements will be set out in the updated LDS once clarified
- b) A review of the West of England (WoE) Joint Waste Core Strategy
- c) Finalisation of the West of England Green Infrastructure Strategy. This is not a statutory plan but it is a key document which helps the WoE Unitary Authorities UAs to meet statutory planning requirements (such as Biodiversity Net Gain) and other corporate objectives requirements. This will also assist in addressing requirements from the forthcoming Environment Bill
- d) Preparation of the West of England Placemaking Charter to establish a level of ambition for Placemaking in the West of England.

(2) Local Plans

- a) The programme and scope of the preparation/review of the B&NES Local Plan (which will replace the Core Strategy and Placemaking Plan) will be a critical plan for realising corporate objectives, particularly those relating to the Climate and Nature Emergency. Key issues to be addressed include;
 - Maximising the sustainability of the construction of new development
 - Reflecting the new more robust approach in national policy towards viability and provision of affordable housing
 - Reflecting the Green Infrastructure Strategy findings, including a review of the approach to the provision of open space
 - A revised approach to new Purpose Built Student Accommodation (PBSA)
 - Update the policy on Houses in Multiple Occupation (HMO)
 - Facilitate the need for new renewable energy generation
 - Requiring greater provision of walking and cycling including safe walking routes
 - A review of the car parking standards including provision of electric vehicle charging points
 - A review of the provision of Student Accommodation.
- b) A review of the approach to meeting the needs of the travelling community and boat dwellers

(3) Neighbourhood Plans

- a) There are 16 Neighbourhood Plans in B&NES either made, under preparation or being reviewed and B&NES has a duty to support local communities in this

work. The Council will liaise with local communities so that the LDS can set out the programme of work up to 2023.

(4) Supplementary Planning Documents (SPDs)

- a) The preparation and review of a number of Supplementary Planning Documents are critical to realising objectives in the emerging Corporate Strategy, particularly in relation to the Climate and Nature emergency. Particular SPDs work requires;
- a review of the Houses in Multiple Occupation (HMO) SPD in light of updated licensing data and the revised Local Plan
 - a review of the Sustainable Construction and Retrofitting SPD to enable and facilitate the environmental efficiency of existing homes
 - a B&NES Design Guide SPD to reflect the West of England Placemaking Charter
 - the publication of the Somer Valley Enterprise Park SPD to facilitate delivery
 - Strategic Development Location SPDs such as for North Keynsham
 - a review of the Planning Obligations SPD to align with the new Local Plan, the Climate Change and Nature Emergency objectives and to ensure that maintenance of infrastructure is addressed as well as the provision of new infrastructure.

(5) Other statutory documents and strategies

- a) an update to the statutory Statement of Community Involvement
- b) a review of the CIL charging Schedule and the CIL Spend Protocol to ensure that spending aligns with the Council's new priorities in the revised Local Plan including both the maintenance of existing infrastructure as well as the provision of necessary new infrastructure
- c) a review of the Infrastructure Delivery Plan to ensure that infrastructure supporting Climate and Nature Emergency objectives are properly reflected and to ensure that new development is properly aligned with new infrastructure
- d) Maintaining an up-to-date Policies Map to reflect the changing policy framework
- e) The preparation of a Tree and Woodland Plan
- f) Review of the B&NES Green Infrastructure Strategy
- g) The preparation of Biodiversity Net Gain guidance (SPD)
- h) The preparation of a Walking and Cycling SPD

3.3 Whilst SPDs play a very useful role in elaborating planning policies, the Town & Country Planning Regulations require that any policy change must be in a Development Plan Document (DPD ie a Local Plan). SPDs can only supplement Local Plans and they cannot make new policy. In addition, some issues will require a change to national legislation and therefore B&NES is working with partners, other UAs and community groups to lobby for these changes.

4 STATUTORY CONSIDERATIONS

4.1 The Planning and Compulsory Purchase Act 2004 (as amended), requires all local planning authorities to prepare and maintain a Local Development Scheme (LDS). The LDS sets out the programme, resources and arrangements for the

production and review of statutory planning documents that the Council is preparing, or intends to prepare. The LDS should be kept up-to-date.

- 4.2 The process for the preparation of policy documents is regulated by statute, governing matters such as the publication, consultation, scope and content of plans, public examinations and adoption. These requirements will be reflected in the revised LDS in the individual plan programmes.
- 4.3 In light of the plan-led nature of the planning system, it is essential that any corporate objectives relating to development and the use of land are developed through statutory planning documents and not as informal masterplans or other documents.
- 4.4 The Planning Acts require that planning decisions must be determined in accordance with Development Plan Documents or Neighbourhood Plans unless material considerations indicate otherwise.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The Council's planning framework is critical to the delivery of its Corporate Strategy. The formulation of planning policy will require extensive cross-service working to ensure a co-ordinated approach and an efficient use of resources.
- 5.2 The preparation of Planning Policies for the District is primarily funded by the Local Development Framework Budget, Government grants and funding from WECA. The scope and progress of preparation of planning policy documents will depend on the available resources. To fund the Tree and Woodland Plan, the review of the HMO and the Sustainable Construction Supplementary Planning Document, budget growth bids have been put forward in the Council's 2020/21 Budget Proposal and are subject to approval. If there are any funding gaps, the existing budget will need to be reviewed and re-prioritised or alternative funding identified.
- 5.3 Planning policies will also have a direct impact on the value of land and buildings, which in turn will affect income from the New Homes Bonus, Council Tax and Business Rates. However, impacts to Council Tax and Business Rates cannot be taken into consideration as part of the assessment and preparation of the Planning Policies.
- 5.4 The planning framework in B&NES has been particularly successful in bringing substantial income into the Council such as CIL, S.106 agreements, New Homes Bonus, and HIF relative to its size. The New Homes Bonus achieved equates with larger cities like Birmingham and Bristol, and far exceeds other districts which contain a historic city like Oxford and York.
- 5.5 An up to date LDS assists with the efficient operation of Development Management, by helping to ensure an up-to-date Development Plan, limiting the costs associated with speculative planning applications and resisting expensive planning appeals.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7 CLIMATE CHANGE

7.1 Since the adoption of the Core Strategy and the Placemaking Plan, and the supporting SPDs, the Council has declared a Climate and Nature Emergency. The Council's planning policies are critical to the realisation of these objectives, as evident in the Climate Emergency Update to Full Council on 10th October 2019, and therefore the Planning Policy framework needs revising as outlined in para 3.2 above.

8 OTHER OPTIONS CONSIDERED

8.1 Preparation and maintenance of a LDS is a statutory requirement. The LDS needs to be revised to take into account the issues outlined in para 3.2 above and to deliver the Council's priorities and statutory requirements.

9 CONSULTATION

9.1 The Council's Monitoring Officer and Section 151 Officer have had the opportunity to input to this report and have cleared it for publication.

9.2 There is no requirement to consult on the preparation of the LDS although the Plans within the LDS will undergo statutory public engagement in line with the Statements of Community Involvement.

| | |
|--|---|
| Contact person | Lisa Bartlett (Director, Development & Public Protection) 01225 477550 Simon de Beer (Head of Planning) 01225 477616 |
| Background papers | The Planning and Compulsory Purchase Act 2004 (as amended) National Planning Policy Framework 2019 National Planning Practice Guidance B&NES Local Development Scheme 2019 to 2021 B&NES Council Climate Emergency Progress Report 10 October 2019 B&NES Core Strategy 2014 B&NES Placemaking Plan 2017 |
| Please contact the report author if you need to access this report in an alternative format | |

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| Bath & North East Somerset Council | | |
|---|--|--------------------------------------|
| MEETING: | Cabinet | |
| MEETING/ DECISION DATE: | 16 January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3179 |
| TITLE: | Integrated Transport Authority (West of England Combined Authority) | |
| WARD: | All | |
| AN OPEN PUBLIC ITEM | | |
| List of attachments to this report: | | |
| N/A | | |

1 THE ISSUE

- 1.1 The West of England Combined Authority (WECA) Order 2017 transferred to the Combined Authority responsibility for certain public transport functions. This report provides an update on the work to transfer the specified functions from this organisation to WECA.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Approve the transfer to WECA of the staff (and associated costs) to enable the direct delivery by WECA of the four core public transport functions contained in the WECA Order 2017, on the basis that there is no additional cost to this authority or loss of income
- 2.2 Delegate to the Director of Environment authority to progress the transfer arrangements, in consultation with the Cabinet Members for Transport

3 THE REPORT

- 3.1 The WECA Order 2017 transferred to the Combined Authority responsibility for certain transport functions, primarily related to public transport operations including Concessionary Travel, Bus Service Information, Community Transport and Supported Bus Services (as a joint function), but also including responsibility to develop transport policies for its area and to carry out its functions to implement those policies.
- 3.2 For practical reasons the delivery of these functions has remained with the Unitary Authorities (UAs) since the establishment of WECA. However, the WECA Committee on 30th November 2018 agreed that delivery of the public transport functions be carried out

directly by WECA, and that the WECA Director of Infrastructure, in consultation with equivalent Directors from the constituent councils, develop and implement a transition plan.

- 3.3 The Integration Project has made good progress in clarifying how the delivery of these functions should be transferred, including the staff.
- 3.4 The creation of WECA as the Transport Authority for the region is expected to bring the following benefits:
 - Principle of “greater than the sum of the parts” – meaning we can achieve more by combining resources through WECA than as councils working individually
 - Providing a consistent transport offer across administrative boundaries
 - Improved resilience and operational efficiency
 - Stronger negotiating position with transport providers
 - Improved visibility/influence of the region at a national level
 - Greater opportunities to advance sustainability and climate change agendas
 - Access to more capital funding
 - Delivering a regionally prioritised transport investment programme
- 3.5 The Integration project is being led by WECA, with close involvement from the UAs at all levels to ensure the proposals are fit for purpose. It is steered by a Directors Board and guided by a Heads of Service Group. Officers from each UA have been seconded into the Integration project team within WECA to feed their knowledge and expertise into the projects and provide a link back to the technical teams within each UA.
- 3.6 Technical Working Groups have been established, including representatives from each of the UA Public Transport Teams, to provide input into the detail of the proposal, around existing and future working arrangements.
- 3.7 Working Groups with representatives from each UA have also been established for HR, Communications, ICT, Legal and Finance work streams.
- 3.8 The integrated team will be incorporated within the Infrastructure Directorate at WECA. The WECA Transport Board, comprising transport members from the UAs plus the WECA Mayor, will provide guidance to the WECA Committee on any transport related matters.
- 3.9 The WECA Committee will agree the allocation of the Transport Levy as part of approving the annual WECA budget. This decision is subject to a unanimous vote in accordance with the WECA Constitution.
- 3.10 An overarching operating agreement between WECA and the UAs will be established with the Directors Board, setting out how the integrated WECA team will work with and support teams remaining in the UAs, the senior managers and local Councillors. More detailed protocols will define the working arrangements at a technical level, clarifying responsibilities, lines of communication and prioritisation.

4 STATUTORY CONSIDERATIONS

- 4.1 The WECA Order 2017 states that the following are exercisable by the Combined Authority in relation to the area:
- a. The functions of the constituent councils specified in Part 4 (local passenger transport services) and Part 5 (financial provisions) of the Transport Act 1985: and
 - b. The functions of the constituent councils as local transport authorities specified in Part 2 (local transport) of the 2000 Act.
- 4.2 The first set of legislative functions grouped under (a) have been translated into the WECA constitution which specifically highlights the following functions: Concessionary Travel; Bus service information (including Real Time Information); Community Transport; and a joint responsibility, with the constituent councils, for Supported Bus provision. Joint responsibility means that individual Unitary Authorities must make a decision independently of the Combined Authority in line with their own constitutions.
- 4.3 A full list of contracts related to transferring functions has been established by the project team. WECA has employed legal advisors to assess the changes required to novate, or otherwise transfer, these contracts as part of the integration. Following this decision WECA will work with the UAs' legal representatives to make the necessary arrangements.
- 4.4 The transfer of the public transport functions to WECA is a 'Service Provision Change' and as such the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) applies. The staff assigned to the core functions, and/or related activities, would transfer to WECA under TUPE regulations, which aim to protect employees if the business they work for changes hands. An HR work stream has been established, comprising Senior HR Officers from WECA and the UAs. The requirements of the TUPE Regulations have been followed and implemented. There are 3.5 FTE posts in scope to transfer to the ITA. The council would retain a part time vacant post to deliver the retained functions.
- 4.5 The public sector equality duty created under the Equality Act 2010 means that public authorities must have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the Act
 - Advance equality of opportunity between people who share a protected characteristic and those who do not
 - Foster good relations between people who share a protected characteristic and those who do not
- 4.6 The Act explains that having due regard for advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics.
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

- 4.7 The general equality duty therefore requires organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected in the design of policies and the delivery of services, including policies, and for these issues to be kept under review.
- 4.8 Bath and North East Somerset Council proactively and routinely monitors the impact of changes to workforce numbers and organisational structures with regard to protected characteristic groups. Annual summary data is examined for wider and longer-term trends and to identify any potential mitigating action required at a strategic policy level. The Council publishes an annual report of equalities issues as well as a more detailed annual report on equalities in employment.
- 4.9 The Council's Organisational Change Procedure and, in particular, TUPE Procedure which have been equality impact assessed will be followed throughout the formal consultation and service implementation process to ensure no disproportionate impact for any 'protected characteristic' group. HR monitors equality related information in respect of staff.
- 4.10 Any TUPE exercise will not result in posts being deleted or fundamentally changed nor will it see there being any change to, in particular, contractual terms and conditions of employment of those staff affected, i.e. in accordance with the TUPE regulations

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 There are 3.5 posts in scope for transfer and the council is retaining one part time post.

A finance working group has been established including finance officers from each of the UAs and WECA. This group is working to establish the adjustments required to the Transport Levy to reflect the transfer of staff and resources. The approval of the adjustments to the transport levy for 2020/21 will form part of the annual budget setting process. The costs to be transferred to WECA as a result of the creation of the ITA that will be levied back to the Council are detailed below:

| Item | £ |
|---------------------------|----------------|
| Staff | 158,704 |
| Non-Staff | 39,968 |
| Contracts (supported bus) | 663,208 |
| Total | 861,880 |

- 5.2 The 2018 WECA Committee Report stated one of the reasons for transfer as "no additional costs will be incurred by the constituent councils as a result of any transfer and, where appropriate, efficiencies will be realised" (section 8, f.).
- 5.3 All existing supported bus service contracts will run their course. It is anticipated that, as is currently the case, there will be some yearly fluctuations in the actual costs of running the functions due to the unpredictability of Concessionary Fares take-up. The base budget for 2020/21 will be reviewed by the Director of Investment and Corporate Services (WECA) in consultation with the Unitary Authority Section 151 Officers.
- 5.4 Park and Ride services, including discussions on the division of roles and responsibilities (post April 2020), the nature of support through the ITA, form part of on-going discussions with WECA personnel.

6 RISK MANAGEMENT

6.1 The risk register relating to this project is held by WECA. The Director Project Governance Board reviews the risk register and mitigation measures on a regular basis. Our risk assessment indicates that the following represent the key risks:

- Ability to maintain continuity of service to the public as the functions are transferred
- Insufficient resources are transferred to maintain the existing level of service
- Systems and equipment do not work in a new location or with new operating systems; and
- Local knowledge and experience is lost following the transfer of functions.

6.2 To mitigate these risks the project has established a technical group to consider in detail how the delivery of functions will happen following the transition. The group includes representatives from each UA with experience of the day to day operation of the current functions. As referred to above, the overarching operating agreement between WECA and the UAs will help manage the relationships between WECA and the UAs whilst more detailed protocols will define the working arrangements at a technical level.

7 CLIMATE CHANGE

7.1 The integration of the public transport functions is expected to provide a stronger negotiating position with transport providers, advancing the agenda around environmental issues such as carbon emissions and local air quality. In addition, the delivery of public transport services by a single authority is expected to result in an improved service to the public (through cross-boundary consistency and increased negotiating powers), further encouraging the use of public transport.

8 OTHER OPTIONS CONSIDERED

8.1 Transfer of concessionary pass eligibility assessment and pass printing/issuing. These services are delivered by the UAs via a combination of customer services, administration/business support and revenues & benefits teams with a variety of application processes including online. WECA does not currently have an equivalent Customer Service facility and is unlikely to be able to provide this in the near future. Whilst online applications could be encouraged it is unlikely that the customer group can be entirely moved to online services in the short term. Regardless, the online application process requires standardisation for use at a regional level. It is therefore considered that this activity would best remain within the UAs, at present, whilst the integrated team considers the appropriateness and practicality of standardising processes.

9 CONSULTATION

9.1 Staff were given an initial briefing on the project in August 2019. An update has been provided to them in October/November 2019 setting out the progress of the project. The formal TUPE consultation process in January/February will confirm which staff will transfer to WECA and provide an opportunity to discuss personal issues. The implementation date being 1 April 2020. Further work will be undertaken, as part of Phase 2 of this project, to determine whether there is a business case to transfer additional functions in to the ITA. Statutory Officers and the Cabinet Members for Transport will be fully engaged in the scoping and development of any Phase 2 proposals.

9.2 Bus operators were given an overview of the project at the West of England Bus Operators Association (WEBOA) meeting on 11th September.

| | |
|--|--|
| Contact person | Mandy Bishop, Director of Environment Tel: 01225 394019 |
| Background papers | Background information on the development of the Integrated Transport Authority (ITA) can be found in the WECA Committee Paper – Transport Functions (30 November 2018), please see the link below: https://westofengland-ca.moderngov.co.uk/documents/s689/13%20-%20WECA%20ITA%20Functions%20paper%2030%20Nov%20final%2019%20Nov.pdf |
| Please contact the report author if you need to access this report in an alternative format | |

| Bath & North East Somerset Council | | |
|--|---------------------------|--------------------------------------|
| MEETING | Cabinet | |
| MEETING | 16 January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3180 |
| TITLE: | Mead Lane Moorings | |
| WARD: | Saltford | |
| AN OPEN PUBLIC ITEM | | |
| <p>List of attachments to this report:</p> <ul style="list-style-type: none"> • Consultation Report and Options Analysis, Mead Lane Moorings, Saltford (November 19) • Appendices – Consultation report and Options Analysis • Equality Impact Assessment | | |

1 THE ISSUE

1.1 As landowners, the Council is responsible for a stretch of riverbank adjacent to Mead Lane, Saltford. The Council introduced a 12 month mooring trial in November 2016 following discussions with the local community. The purpose of this report is to provide an update on the trial; consider the feedback received from communities and partners and agree the next steps.

2 RECOMMENDATION

The Cabinet is asked to;

2.1 Request officers undertake a structural survey of the river bank at Mead Lane and as part of the survey consider the suitability of this land for future moorings. This request is subject to approval of the revenue budget provision by Cabinet/Council in February 2020.

2.2 Request that officers report back to Cabinet once the results of the structural survey are known, to enable Cabinet to make an informed decision on the long term use of this land

- 2.3 In the interim period (whilst the survey is undertaken) Cabinet to decide whether to remove moorings at mead lane, or remove the 48 hour mooring facility (leaving the 14 day), or leave the existing arrangements in place.
- 2.4 Request that officers undertake further analysis of residential mooring arrangements along the river, to include arrangements for boaters and their families.

3. THE REPORT

- 3.1 The council undertook works to stabilise the river bank adjacent to Mead lane around 2004/5. It appears that the stabilisation works resulted in the site becoming more attractive for residential moorings. Over the subsequent years complaints from the local community about unregulated moorings increased and the council agreed to introduced a mooring trial (2016/17), with the aim of addressing these concerns. The trial resulted in the provision of a mixture of 14 day and 48 hour residential moorings (there are more 14 days moorings). Mooring posts and an information board were installed. Revenue resources were not identified to coordinate the monitoring of the moorings, including overstays. Where appropriate, complaints have been investigated on a case by case basis by individual services at the council. There is a strong feeling in the community that the council should have allocated resources to enhance monitoring/compliance checks and for any follow up action. The council did explore with the Canal & Rivers Trust if they could manage these moorings but at the time this wasn't supported due to lack of capacity and no commitment from the council to allocate resources.
- 3.2 Since 2017, community tensions have escalated between the local community and the boating community. This resulted in a 'Community Trigger' being called by the then ward councillor, under the provisions of the Police and Crime Act 2014 (September 18). The 'Trigger' is a mechanism by which victims of persistent anti-social-behaviour (ASB) can ask relevant bodies to review their response and action. A number of actions were agreed and implemented as a result of this process. The 'Trigger' was not seen to resolve all the issues by local residents.
- 3.3 There is a requirement for boaters to move on a regular basis to ensure compliance with their continuous cruising licences (issued by the Canal and Rivers Trust). The Live-aboard Boaters place a high value on the moorings, particularly the 14 day facilities. There are very limited opportunities to moor along the River Avon (Navigation) with The Canal and Rivers Trust (CRT) advising that the moorings at Mead Lane are the only 14 day moorings available on the river. There are limited 24/48hr moorings at Mead Lane, Bitton and Hanham.
- 3.4 In 2013 B&NES Housing & Major Projects Overview & Scrutiny Panel ran a Task & Finish review on Boat Dwellers & River Travellers and concluded that the current provisions for boaters was poor and we should seek to provide more moorings and better facilities.

- 3.5 In 2017 the council in partnership with the Environment Agency, Canal & Rivers Trust and Wessex Water produced the Waterspace study; this included a detailed boater survey. The results highlighted the need for more moorings, accessible/disabled moorings and better enforcement. The study also included possible interventions to improve Mead Lane moorings.
- 3.6 During February 2019, a senior officer was requested to coordinate and review the council's action and response to issues along Mead Lane. Informal discussions and site visits were held with all parties to better understand the background to the multitude of issues/concerns and with a view to finding a common way forward.
- 3.7 Following these initial meetings enhanced monitoring arrangements were put in place, these consisted of:
- Increased Police Officer/PCSO patrols
 - Use of 3GS to undertake proactive environmental patrols
 - Moorings compliance checks

Note: monitoring of overstays was not undertaken as part of these arrangements

- 3.8 16 compliance visits were undertaken by officers between 16 May and 13 November 2019. During these visits officers noted that there was no evidence of nuisance, littering or ASB. The one regular non-compliance noted related to boats mooring to trees, rather than using the mooring hooks. Visits were undertaken during the working week, at evenings and at weekends. During this same time period the community continued to provide regular reports of overstays and forward allegations of anti-social-behaviour/criminal activity.
- 3.9 Colleagues at Avon and Somerset Police advise that over the 12 month period (October 18-19), 12 calls were logged from the community about matters in and around the Mead Lane area. They advise that appropriate investigations were undertaken. All matters were dealt with on an informal basis.
- 3.10 In May 2019, following a discussion with the Cabinet Member for Community Services and the Ward Councillors for Saltford, it was agreed to undertake a community consultation on the future of the moorings. The trial arrangements had been informally reviewed; however, it was felt that a formal review was necessary. An independent organisation was engaged to undertake this consultation and engagement.
- 3.11 During the consultation period additional questions were raised about the suitability of this stretch of Mead Lane for residential moorings. Reference was made to a number of documents, including engineering reports that informed the stabilisation works in 2004/5. Questions have been raised by the community about the potential impact of the moorings and the suitability of the site for continued residential moorings. Advice was sought from one of the council's most senior civil engineers. He advises that the

age of the report and history since the consultants undertook the investigation means that it would not be advisable to base any recommendations on this information. The road is subject to periodic inspection by the Highway Inspector who would report any visual evidence of the road being affected by the moorings. At present, there is no visual evidence of deterioration. In summary, the only way the council could determine the current condition of the bank and its' suitability for future moorings is to commission a specialist survey. At present, we have no evidence either way of any direct impact of moorings on the condition of the riverbank. This would require the council to employ a specialist contractor.

3.12 The provision of open space, canoe launch points and places for fishing have been raised as part of the most recent consultation process. The Shallows, Saltford is council owned open space close to Mead Lane which has been identified in the Waterspace study (project 18) for improvement for biodiversity, canoe launch point and is also a place to fish. Along the River Avon there is over 6 miles of riverbank for free fishing and six local angling clubs with fishing rights.

4. STATUTORY CONSIDERATIONS

4.1 The consultation process. A robust and detailed consultation and engagement plan was implemented. The council has ensured that it is compliant with the following principles to ensure a fair consultation:

- consultation on proposals at a formative stage
- the consultation period should be of adequate time and
- The product of the consultation should be conscientiously taken in to account

4.2 Equality Act 2010 duties. The Council has a public sector equality duty to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people carrying out their activities. Live aboard boaters are not specifically covered under the protected characteristics identified under the Act (eg Gypsies and Irish Travellers); however, age, disability and pregnancy/maternity are protected characteristics under the legislation. In March 2019, CRT data indicated that there are 995 boats operating between Bath and Foxhangers, of which 403 of these are on continuous cruiser licences. 48 boats/boaters have licences with reasonable adjustments in place under the provisions of the Equalities Act 2010. Overstays are also approved by the CRT in cases of mechanical breakdown, medical emergencies and where boaters have caring responsibilities. In summary, there will always be a number of overstays on the Mead Lane site over any designated period, for legitimate reasons. Barriers faced by boaters include access to services, access to public transport and the affordability and availability of suitable residential moorings.

4.3 Equality Impact Assessment/Equality Analysis (EIA). (Appended). The River Avon at Mead Lane, Saltford is a popular location for leisure and recreation, and for informal mooring of boats. Until now it has been used as an unregulated mooring space utilised by live aboard and other boaters. The area was subject to a temporary mooring trial introducing 48 hour and 14 days' time limited moorings between December 2016 and October 2018.

Boat dwellers with a continuous cruising licence must move every 14 days (unless extenuating circumstances arise). The moorings at Mead Lane make up part of the local mooring network and some of those using the moorings will have a car to enable them to get to work/school/GP etc.

The Council is owner of this stretch of the river and does not have regulatory power to enforce mooring compliance. As the Council is the owner of this stretch, Canal and River Trust do not have the powers to monitor, inspect and report on overstaying, therefore during the mooring trial compliance with the 14 day or 48 hour stays was self-regulatory.

Bath and North East Somerset Council commissioned an independent survey of stakeholders on the options for the future of the Mead Lane moorings, and seeking views from all those who live, visit and work in the area.

In advance of the mooring trial white lines were installed along the lane to discourage vehicles parking opposite residential driveways (Nov 2016).

During the period of the mooring trial a Traffic Regulation Order prohibiting overnight parking between 1am-8am was consulted upon. A decision was made not to implement a parking restriction.

The intended outcome of the mooring consultation is to resolve current tensions and complaints from some house residents against boaters and vice versa.

In this case the service users are the general public, some of whom are boat dwellers and others using boats to travel along the River Avon. CRT figures show: March 2019 – 2,456 boaters on Kennet & Avon canal, 995 boats between Bath and Foxhangers (40% of boats on 22% of K&A), 403 of 995 are continuous cruisers, 80 holiday hire, 43 trade boats. The proposal will have an impact on boat dwellers (continuous cruisers on the waterways network) as well as residents and leisure users of the moorings at Mead Lane.

4.4 Housing considerations. The residential moorings at Mead Lane do not fall under the provisions of the Housing Act 2004. Residential moorings do not constitute a travellers' site or transit site and are not a site created by the council. Further, the Housing Health and Safety Rating System (Housing Act 2004) does not apply to boats; the standards are covered by the C&RT licensing process. Matters relating to disposal of waste, human or domestic from boats are dealt with by the C&RT. A live aboard boater, like any resident, can apply for social housing or, if

appropriate, present as Homeless under the Housing Act 1996. With regard to the Housing and Planning Act 2016, the Council is required to consider the needs of boaters when carrying out its periodic Gypsy and Traveller needs assessment. Currently a contractor working across the West of England area is undertaking this work. The results of this survey are to be made available January/February 2020.

4.5 Enforcement provisions. The council and police have powers under various pieces of legislation to remove caravans etc from unauthorised sites on land. However, this legislation applies only to wheeled vehicles. There is an expectation in the local community that the council will take trespass action for mooring overstays. Officers carefully balance duties and responsibilities, public interest, likelihood of success and cost before commencing any enforcement action. Trespass action could be considered for individual mooring overstays where there was evidence of a mooring over a prolonged period of time and where detrimental impacts of actions by an individual boat/boater could be evidenced. The cost of such proceedings can escalate quickly. The council is not currently resourced to gather this evidence and instigate legal proceedings of this nature. That said, officers continue to respond to resident requests/enquiries in accordance with our policies and procedures. It is recommended that if moorings are to continue at this locality, some revenue sum should be put aside to engage CRT to undertake enhanced monitoring and action to secure compliance with any contraventions of licences.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 The infrastructure installed to implement the trial in 2016 was funded from a small capital grant. No additional revenue sums were allocated at this time to enhance and coordinating monitoring arrangements. The residential moorings have taken up an increasing amount of officer time in recent years, as community complaints and enquiries have increased.

5.2 A growth bid has been submitted as part of the 20/21 revenue budget considerations, to undertake any one off small works and to provide a sum for on-going monitoring and enforcement (£35k for 20/21 and an on-going annual revenue provision of £25k from 21/22). The draw-down of these funds is subject to the Cabinet decision to continue with/or not to continue with residential moorings at Mead Lane. It is estimated that the costs of the structural survey would be in the region of £10,000. Should the growth bid be approved, the remaining funds would be utilised to enhance monitoring and enforcement arrangements and to undertake any further analysis of current residential moorings and boater needs.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

6.2 The key risks and mitigation measures are detailed below:

| Risk | Details | Mitigation |
|--------------|--|---|
| Legal | <ul style="list-style-type: none"> • The council has a range of statutory duties to fulfil • Risk of legal challenge on either side | <ul style="list-style-type: none"> • Relevant officers across the council engaged in the review and in response to enquiries |
| Financial | <ul style="list-style-type: none"> • Costs to implement any agreed Cabinet decision and to respond to consultation outcomes • Significant officer time is currently being spend responding to enquiries • Cost of any legal challenge | <ul style="list-style-type: none"> • Revenue growth bid submitted for consideration in accordance with council financial planning and governance processes |
| Safety | <ul style="list-style-type: none"> • Stability of the riverbank and impact of moorings | <ul style="list-style-type: none"> • Up to date survey to be commissioned, subject to Cabinet/Council approvals |
| Reputational | <ul style="list-style-type: none"> • In recent years there has been a deterioration in the relationship between the council and a small number of local residents and local partners | <ul style="list-style-type: none"> • Engagement of an independent third party to undertake the consultation and engagement • Decision making through Cabinet to enable all interested parties the opportunity to participate in the democratic process and ensure that a decision on the future of the moorings is open and transparent |

7 CLIMATE CHANGE

7.1 The impacts of climate change will result in more frequent/heavy downpours of rain, possible higher wind speeds.

7.2 Related considerations include how the council manages flood risks and takes forward opportunities to enhance the natural environment, water quality and air quality.

8 OTHER OPTIONS CONSIDERED

8.1 There are two options available to Cabinet at this time – to either make a decision without the benefit of an up to date survey or put in place an interim arrangement until the results of an up to date structural survey of the riverbank are known. As this is such a specialist area of work it may take several months before the survey is completed and the report received. River conditions need to be suitable for the undertaking of a survey. During this interim period Cabinet could make a decision to remove all mooring facilities, leave the existing mooring arrangements in place, or reduce the number of moorings – retaining the 14 day facility.

8.2 Consideration should be given to a number of matters including safety and suitability of the riverbank, the needs of boaters to access suitable moorings and the risks of legal challenge and associated costs.

8.3 There is no evidence that the residential moorings are having/not having an impact upon the structural stability of the bank at this time.

8.4 The Cabinet could decide to make a final decision on the future of the moorings/land at Mead Lane. However, this would be without benefit of an up to date structural survey. This information is considered necessary before any decision can be taken.

9 CONSULTATION

9.1 The consultation took place between 30 September and 31 October 2019. It consisted of an on-line questionnaire, three stakeholder events and one to one discussions with partners. The consultation was widely advertised and we received 1,251 responses, including over 3,500 long answers. 99% of survey responses were submitted through the on-line portal. Questions included:

- What people liked/disliked about Mead Lane
- Views on future mooring options (as per current arrangement, changes to 14 day/48 hour arrangements, fewer moorings, remove the option to moor, riverbank as open space)
- Views on enforcement and management of the moorings
- Potential charging
- And an open section for more broader feedback

9.2 Details of the consultation exercises and responses are appended to this report. All parties were advised that the validity of the results would not be considered on numbers alone. Whilst a small number of multiple entries were identified, this did not skew the overall results of the consultation exercise.

9.3 One of the most interesting outcomes from the consultation is the common ground between the local community and the boaters. Feedback indicates that value is placed on the natural beauty, wildlife and peace and quiet of Mead

Lane. Conversely, dislikes include unfriendliness, litter, waste, pollution and damage to biodiversity. Please refer to sections 3.2.7 – 3.2.8 of the appended report.

9.4 With regard to the future options, the following conclusions are contained in the report (section 3.2.9):

“When viewed by respondent type, those who identified themselves as Saltford residents were more likely to support the provision of open space and fewer or no moorings. Notwithstanding this general trend, the option offering the split of mooring types (14 day and 48 hour) to remain the same was either “strongly supported” or “supported” by 42 Saltford residents, and the idea of increasing the number of 48 hour moorings and offering fewer 14 day moorings was supported by 67 Saltford residents. 69 Saltford residents stated that they did not support the closure of all moorings at Mead Lane.”

“Those who identified as boat dwellers were more likely to support maintaining or improving mooring opportunities in this location. 66% of the boat residents who answered the question were supportive of an increase in 14-day moorings, and 62% supported the situation remaining as it is currently.

| | |
|--|--|
| Contact person | Mandy Bishop, Director of Environment Tel: 01225 394019 |
| Background papers | Mead Lane Mooring Trial 2016 – 17 (v3) – Report on One Year Trial (available upon request) |
| Please contact the report author if you need to access this report in an alternative format | |

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Consultation Report and Option Analysis

Mead Lane Moorings, Saltford

November 2019

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1 Background

Mead Lane in Saltford runs alongside the River Avon and has since 2014 has become an increasingly popular mooring point for the boat community travelling between Bristol and Bath. A short-term mooring trial was undertaken by Bath and North East Somerset Council (the owners of the land), with a mix of 14 day and 48-hour moorings. Lemon Gazelle was commissioned to support stakeholder engagement work on the Mead Lane moorings, to examine viable options for a way forward in respect of the moorings and to inform decision making using Lemon Gazelle's Decision Tool.

The area is significant to the village, and Mead Lane and The Shallows are a popular visitor attraction. The Strategic River Group was formed in 2014, and in 2017 the Waterspace Study was completed by a partnership comprised of Bath and North East Somerset Council, The Canal and Rivers Trust, Wessex Water and the Environment Agency.

There has been increasing controversy over recent years relating to the moorings in Mead Lane, and an amount of tension between the boating community and local residents. This has resulted in police action and interventions from various departments of Bath and North East Somerset Council.

2 Method

Stakeholder engagement was undertaken between 30th September and 31st October 2019 and comprised the following;

- Research into stakeholder groups and individuals to engage
- Presentation with Q&A from local people at Saltford Parish Council meeting (1st October 2019)
- Online and paper survey, promoted online and through posters and articles
- One-to-one conversations with partner organisations
- Three separate events targeting residents, Partner Stakeholders and boaters (22nd October 2019)

Following the close of the stakeholder engagement, analysis of the information collected was undertaken, and this then formed one element of the Options Appraisal. The Options Appraisal uses the Decision Tool to bring together the criteria by which all options will be evaluated, enabling the weighting and subsequent scoring of each option to provide an accountable and rational recommendation.

3 Engagement

3.1 Events

3.1.1 Residents' Event

A drop-in event was held on Tuesday 22nd October between 10am and 1pm at Saltford Hall for residents to drop in and have a conversation with Lemon Gazelle about the Mead Lane Moorings. The intention was to give the opportunity to add to submissions made to the online survey with any new or additional information. The event was attended by 25 residents who had individual conversations with Lemon Gazelle personnel and provided submissions to support their views. The information in these submissions and conversations has been included within the community engagement reporting.

3.1.2 Boaters Event

A drop-in event was held at Bath Cricket Club between 5pm and 8pm on Tuesday 22nd October for members of the boat community to come along and speak to Lemon Gazelle Directors in support of their submissions. 14 people attended this event and participated in one-to-one and group conversations about the Mead Lane Moorings. The content of these conversations has informed the community consultation and issues and ideas taken on board.

3.1.3 Partner Stakeholders Event

Partner organisations were invited to a workshop session at Bath Cricket Club on Tuesday 22nd October. Those organisations in attendance were Avon and Somerset Police, Bath and North East Somerset Council, Julian House and Avon Frome Partnership. Other partner organisations chose to submit their views in writing or through the survey rather than attending the workshop session.

3.2 Stakeholder Engagement Survey

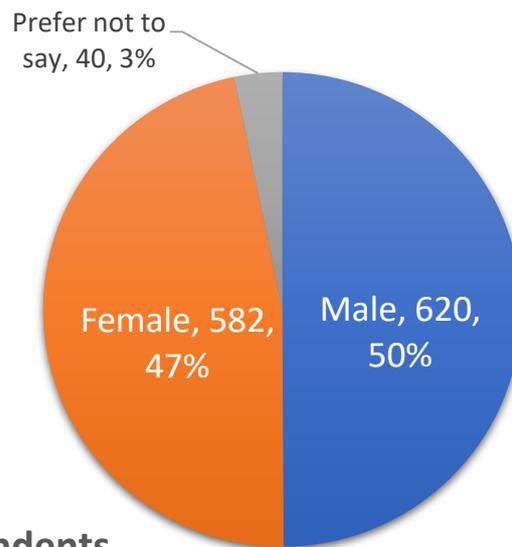
The following organisations submitted views as part of the engagement, either in writing or through the events or the survey;

- Saltford Parish Council
- Avon and Wilts Inland Waterways Association
- Bristol Avon Sailing Club
- Saltford Marina
- Kennet and Avon Boaters Action Group
- Kennet and Avon Trust
- Campaign to Protect Rural England
- Keynsham Angling Association
- Bristol and West of England Federation of Anglers
- Saltford Environment Group
- Saltford Community Association
- Bath Boys Brigade
- Saltford WI
- Saltford Primary School
- Avon and Somerset Police
- Wessex Water

A total of 1,251 responses were submitted to the survey which included over 3,500 long answer comments. Unfortunately, some respondents chose to enter multiple responses, which could have been an attempt to seek to give additional weight to their views; therefore, the majority of the qualitative data will be reported using a narrative rather than a statistical format.

The demographic and geographical breakdown of the respondents can be seen in the sections below.

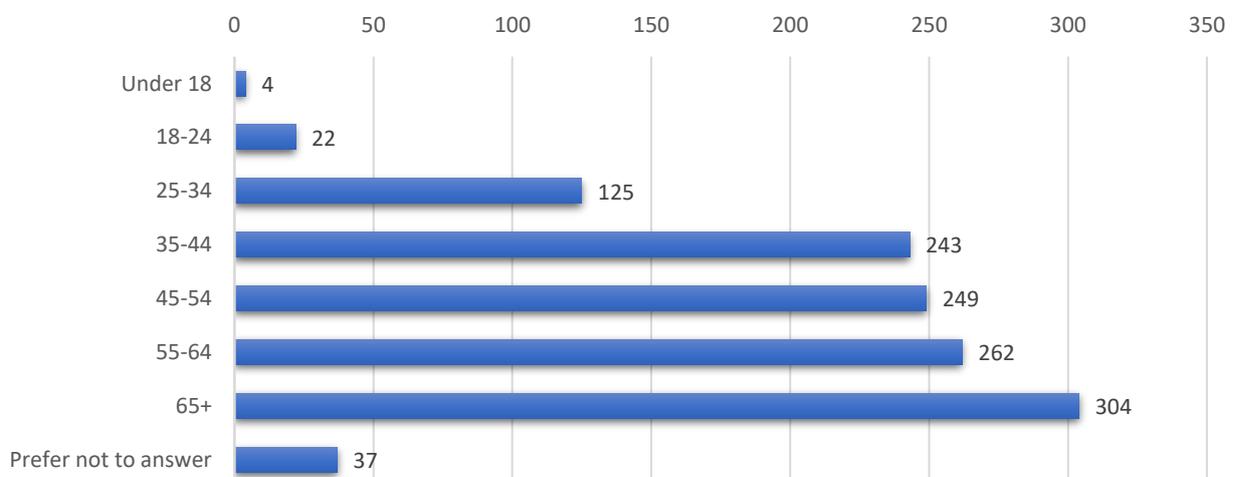
3.2.1 Gender



Gender profile of respondents
(1,242 answered question)

3.2.2 Age

Age profile of respondents
1,246 answered question



3.2.3 Geographic spread

Postcodes or a place where people were at present situated was collected to ensure that, for residents and locals there was an even spread across Saltford and that there was a reasonable opportunity for leisure users and boaters who, at the time of taking the survey, may not be in the vicinity of the area even if it is an area that they use.

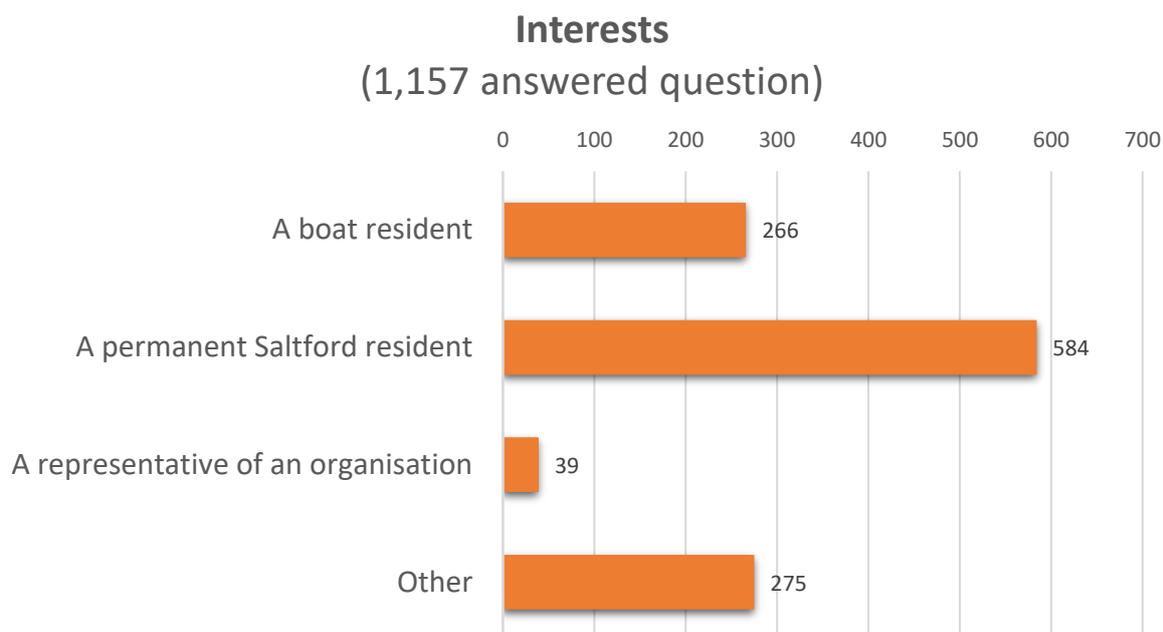
As expected for locals / residents those addresses that were closer to Mead Lane tended to have the higher response rate per road. An example of this is set out in the following table showing those declared postcodes from where there were more than 10 complete postcodes submitted.

| | Road associated with postcode (from Royal Mail) | Number of addresses under that postcode | Number of responses from postcode |
|----------|---|---|-----------------------------------|
| BS31 3EP | Mead Lane | 15 | 33 |
| BS31 3ER | Mead Lane | 14 | 16 |
| BS31 3EZ | Shallows | 6 | 24 |
| BS31 3EG | Homefield Road | 28 | 21 |
| BS31 3EJ | High Street | 40 | 20 |
| BS31 3AL | Claverton Road West | 24 | 18 |
| BS31 3ED | High Street | 26 | 18 |
| BS31 3AD | Haselbury Grove | 36 | 14 |
| BS31 3HL | Tynning Road | 39 | 14 |
| BS31 3DY | Anson Close | 31 | 12 |
| BS31 3BQ | Norman Road | 28 | 11 |
| BS31 3DW | Claverton Road | 21 | 10 |
| BS31 3HP | Rodney Road | 26 | 10 |
| BS31 3LB | Lawson Close | 13 | 10 |

As far as other users (boaters, leisure users, wider organisations, for example), there was a wide spread from where those respondents were, at present, located. The following gives some examples of the geographic range from those who gave narrative answers:

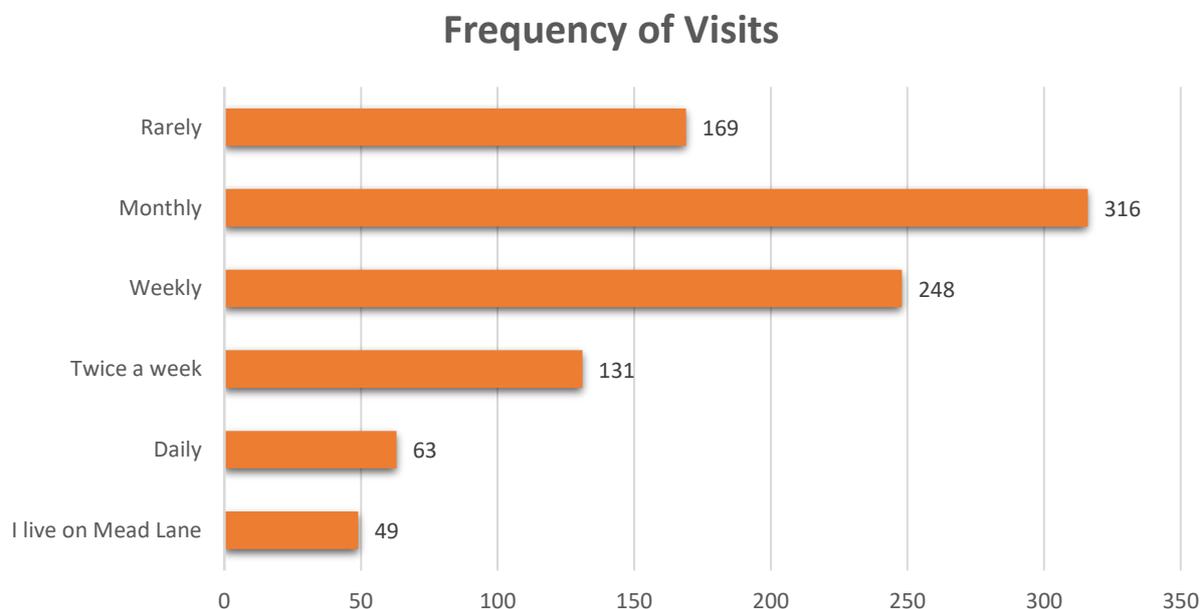
Bristol harbour, River Avon and Kennet and Avon Canal, currently with boat in transit, Bathampton, Darlington Warf, Bath, Swineford, Dundas aqueduct, London, Saul, Cheshire, Bradford on Avon, boater without a home mooring, Boat moored at Semington, Keynsham, Bradford, River lee, Brentford, Keynsham, kanda canal, Avoncliff, All Cannings Wiltshire, Sharpness, River Thames, Portavon marina, Dundas Aqueduct, Kelson, Pewsey, Newbury, Caen hill, Newbridge Bath, Sells green, Great Bedwyn, I am out travelling the country, Widcombe on the K&A, Banbury, Wilcot, Wiltshire, Seend Cleeve West bound, Frouds Bridge Marina, , Semington, Ely, Great Ouse, Oxford canal, Bradford on Avon, Braunston Marina, Gloucester, Nottingham, Continuous cruiser of UK canal system, Bishops cannings, Saltford Marina , Portavon, Lapworth, Braunston, Northants, Claverton, Hilperton, Cropredy, Coventry, Corston.

3.2.4 Interests

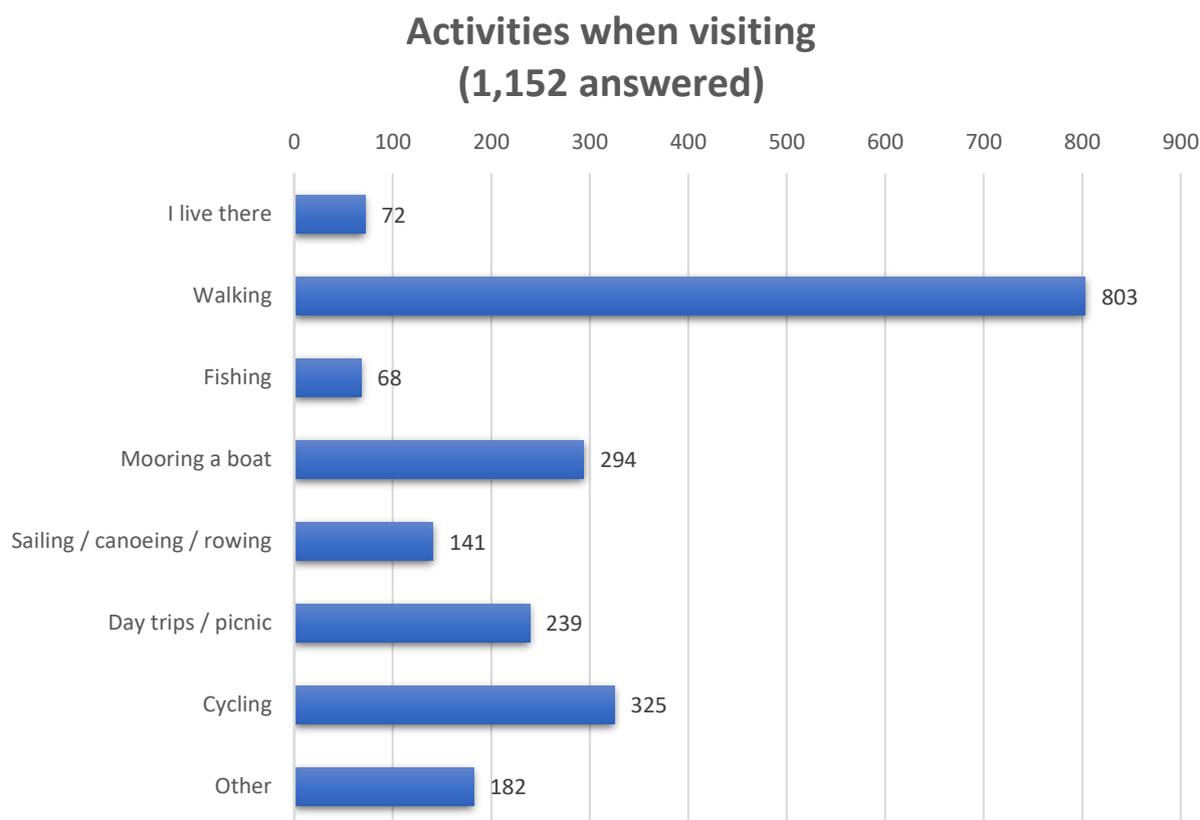


3.2.5 Frequency of visits and activities at Mead Lane

Respondents were asked how frequently they visit Mead Lane, with the greatest number of people visiting monthly. Those who moor at Mead Lane were asked to comment on how many times they moor each season. 177 people provided information, suggesting that mooring visits were usually between 2 and 10 times a season, and tended towards the summer.



3.2.6 Activities



The survey asked what people responding did when they were at Mead Lane. 1,152 people answered this question, with the most frequent answer being walking, as shown in the chart above. Other activities accounted for 182 responses, including the following;

- Using the pubs
- Swimming in the river
- Wildlife watching
- Visiting for work/running a business
- Running
- Visiting friends and family
- Boating
- Horse riding
- Litter picking

3.2.7 What do you like best about the Mead Lane location?

Survey respondents were asked to describe in their own words what they like best about Mead Lane. 1,033 people answered this question, and their answers, whatever their outlook and point of view on the mooring issue were similar.

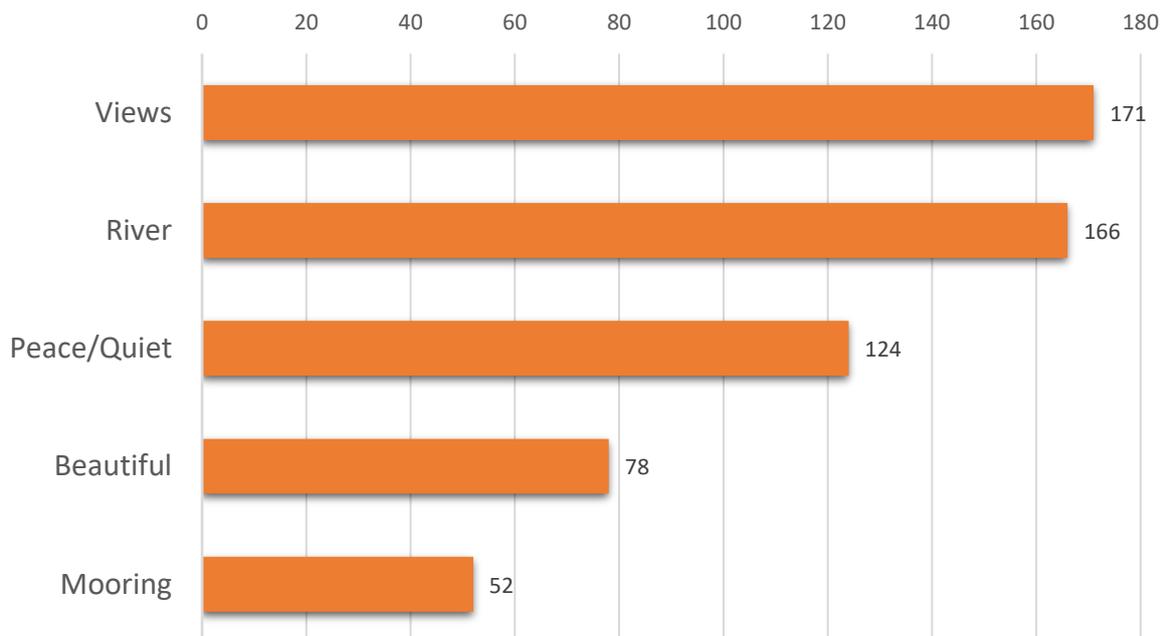
The most commonly raised attributes that people appreciated were the views of the river and the landscape in this area. Natural beauty, wildlife and peace and quiet were also raised by the majority

of individuals. Accessibility and parking were further commonly raised attributes of Mead Lane, and many people from the boat community commented they liked that it is a safe place for mooring.

Despite the controversy surrounding the moorings in this location, a number of residents and visitors remarked that they enjoyed the presence of the boats at Mead Lane.



Like best - top categories



3.2.8 What do you like least about the Mead Lane location?

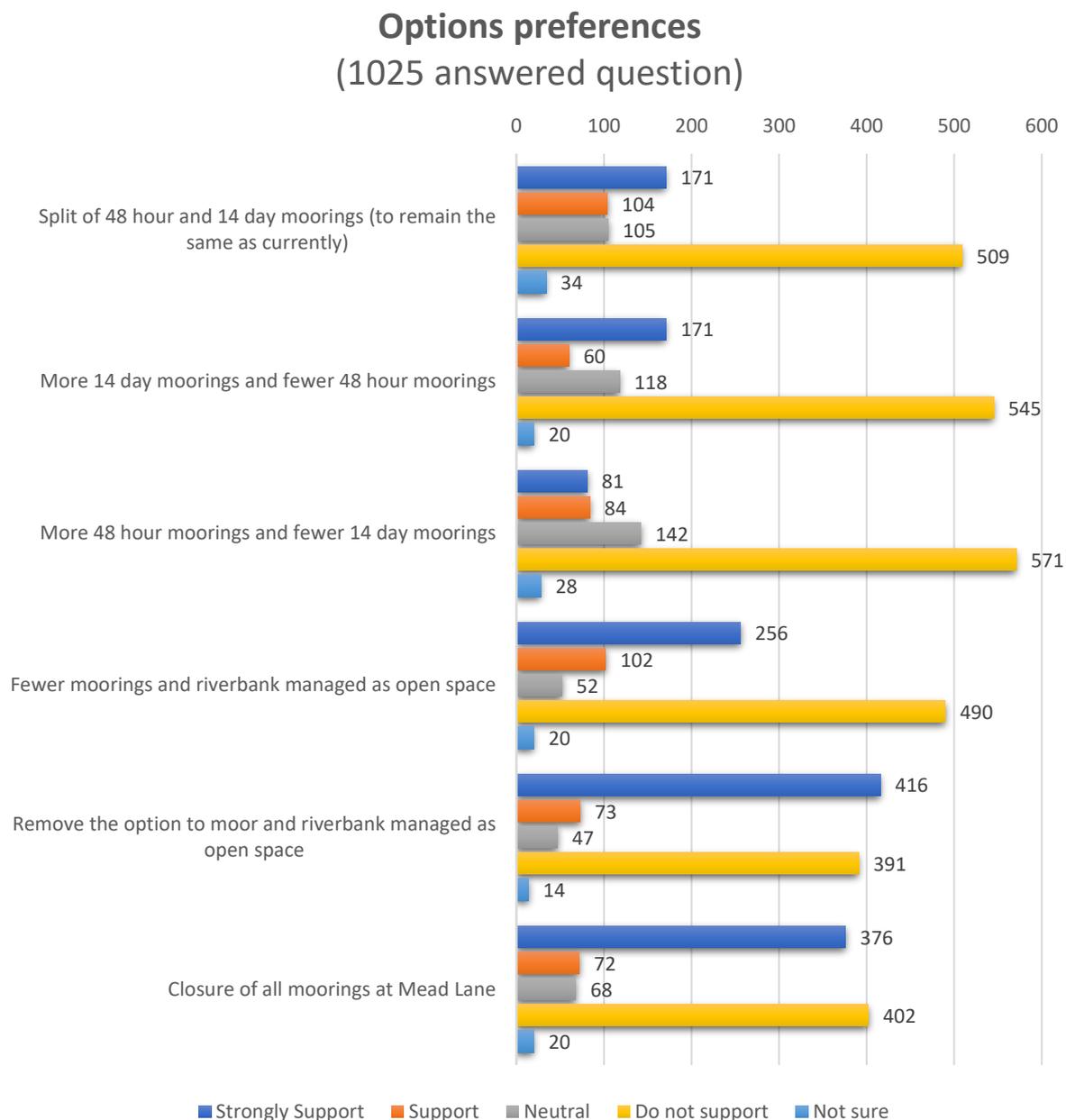
A wide variety of issues and concerns were raised by the 965 people who answered this question, with 64 of these remarking that there was nothing they disliked about the location. Concerns over the mooring of boats at Mead Lane were raised by many individuals. The other specific issues raised can be broadly grouped “dislikes” around environment, traffic, behaviour and facilities, and included;

- Litter and waste management
- Dog control and fouling
- Antisocial behaviour
- Aggressive and antagonistic behaviour from some boaters
- Aggression, excessive scrutiny and invasion of privacy by some residents
- Risk of damage to the riverbank and trees
- Lack of enforcement, control, investment and monitoring by the local authority
- Reduced access to the river for potential users such as anglers and owners of small boats
- Parking
- Volume of traffic
- Speeding and road safety concerns
- Lack of pavement and street lighting
- Residents’ concerns that their views are impeded
- Lack of facilities for mooring such as chemical waste disposal, litter bins and fresh water supply

As with the question on what people like best about Mead Lane, there were many answers the same, and it therefore appears that there is substantial common ground in what people like and don’t like about this location. The common issues that people, whichever user group they come from dislike are unfriendliness, aggression, rudeness, litter, waste, pollution and damage to biodiversity.

3.2.9 Preferences

The survey asked respondents to provide their views on the level of support they would give to the options for the future of the moorings at Mead Lane. The chart below shows their answers.



When viewed by respondent type, those who identified themselves as Saltford residents were more likely to support the provision of open space and fewer or no moorings. Notwithstanding this general trend, the option offering the split of mooring types (14 day and 48 hour) to remain the same was either “strongly supported” or “supported” by 42 Saltford residents, and the idea of increasing the number of 48 hour moorings and offering fewer 14 day moorings was supported by 67 Saltford residents. 69 Saltford residents stated that they did not support the closure of all moorings at Mead Lane.

Pursuing a “no change” option was identified as raising the following issues for the Partner Stakeholder organisations, as described in their workshop session;

- Constant and continued reporting of issues such as anti-social behaviour to the police and Council by both residents and boaters
- A lack of resolution and consequent continuation of aggression
- Reduced risk of homelessness, given the lack of alternatives for continuous cruiser mooring (by continuing with the opportunity to moor here)

Any alteration in mooring duration was not seen as likely to resolve many of the issues by the Partner Stakeholders who felt that complaints, issues with compliance and aggravation would not be reduced. Reducing or removing moorings was discussed by the Partner Stakeholders, and the following issues raised;

- An increase in the risk of homelessness
- Law enforcement issues on open space
- Potential for increased conflict, reporting and aggravation
- The need for additional enforcement since compliance with a reduction or ban is unlikely to be complied with due to boaters need to access jobs and services
- Increase in trespass
- Fewer moorings mean boats moving on more frequently and means life for boaters is more risky

Those who identified as boat dwellers were more likely to support maintaining or improving mooring opportunities in this location. 66% of the boat residents who answered the question were supportive of an increase in 14-day moorings, and 62% supported the situation remaining as it is currently. 416 individuals chose to make additional comments in support of their answers to this question, reiterating the remarks they made in the like/dislike questions above.

3.2.10 Management of Mead Lane Moorings in the event of moorings remaining

The survey asked people if they had views on enforcement and management in the event that the moorings remain at Mead Lane. In response to this question, which 677 individuals chose to answer, a variety of views were expressed as to suitable control and management measures. Whilst some individuals chose to reiterate their desire to remove the moorings, others provided constructive ideas, with the majority stating that effectively resourced monitoring and enforcement are essential going forwards, if this option were selected. The Partner Stakeholders workshop also discussed how the continuation of the moorings could be managed effectively, and proposed the following;

- Accountability, a joined-up approach and clear responsibility for the issue
- Consistent enforcement
- Possibility of commissioning C&RT to monitor and enforce mooring stays
- Provision of facilities such as water, waste and bins

3.2.11 Booking/Charging for mooring

Contrasting views were expressed with some wishing to see a system of booking and charging for moorings in order to adequately regulate it, and others wanting it to remain more informal and self-regulated. Some boaters commented that they would support increased regulation so that all those

who wish to have a fair opportunity to moor at Mead Lane. Charging was generally an unpopular option with boaters.

3.2.12 Enforcement to eliminate overstays

Monitoring and enforcement of boat stays was commented on by a large number of respondents, many of whom were supportive of increased regulation. Whilst enforcement was supported by many, it was noted that previous regulations had not been enforced and questions were raised over the resourcing and commitment of the local authority to implementing these measures in a way that ensures their effectiveness.

Some individuals proposed that the Canal and River Trust be commissioned to regulate boat stays, with penalties in place for overstays that occur without good reason. Whilst enforcement is broadly supported, a number of boaters pointed out in their responses that there may be times when it is not possible to move on in the allotted period, for example in the case of illness, emergency or boat breakdown, and that flexibility is needed in such circumstances. Individuals commented that it is preferable for an independent organisation to carry out monitoring and enforcement, rather than encouraging local people to carry out this role, which unnecessarily causes antagonism between boaters and residents.

3.2.13 Parking and Road Issues

As noted above, concerns were raised in the “dislike” section over parking, speeding, road safety, street lighting and lack of pavement. The possibility of managing some of these concerns by providing additional parking or controlling street parking on the road were raised by some individuals. A number of boat residents commented that one of the attractions of the Mead Lane moorings is the option to park a car nearby, thus enabling the delivery to boats of heavier items such as shopping or wood. A Traffic Regulation Order or parking restriction would require management and enforcement in order to make it effective.

3.2.14 Pollution, littering, flytipping and waste

Concerns were raised flytipping, littering, waste disposal and the pollution arising from generators and wood burning stoves. Large numbers of views were expressed on these issues, which call for the same monitoring, management, enforcement and penalties as in any other location, via the same agencies and authorities. As a preventative measure in this location, some individuals proposed the provision of waste bins, a chemical waste disposal point and a fresh water supply.

4 Evaluating Options

The consultation and engagement process has provided a wide range of data which can inform the future use of the moorings on Mead Lane. In addition to many positive and constructive comments that have been made, a large element has been reflective of past frustrations with the situation. All of these comments will assist in predicting consequences going forward and what actions can be put in place to ameliorate potential negatives.

The detail of the delivery of a recommended option is beyond the scope of this report and much of the thinking around future management can be taken on board if/when the potential for technical assessments have been investigated by the council. This element has been discussed as part of the actions going forward (Section 5.1).

The following methodology utilises a Multi-Criteria Decision Tool to assess future uses of the site in an open, accountable and easy to understand way. It is designed to assist discussion and assessment and provide a recommendation to decision-makers.

4.1 How has the engagement informed each option under consideration?

The engagement helps us find common ground and evaluate the support for the different options as well as ascertaining the potential requirements for a preferred one.

It is important to note that the consideration of options is focussed on the *future* of Mead Lane Moorings and not a judgement of prior behaviour, decisions or anecdotal evidence from the past. At the same time, collected information can help inform the likely behaviours which might result from future actions of chosen options.

In addition, in considering the options it is the use of the bank in the future and the emphasis of the options is around the responsibilities and duties of the owner of the bank; in this case, Bath and North East Somerset Council. Other parties have put forward strong views and submissions based on their own remits and responsibilities, as they were asked to do. For example, Saltford Parish Council have a responsibility to their own constituents / residents; and the Saltford Environment Group have a responsibility to their own purpose. The duties and responsibilities of Bath and North and North East Somerset as owners of the land in question are very different, although sometimes shared. This point is an important one in considering the following options. Bath and North East Somerset Council cannot consider one issue in isolation in detriment to another or that one is more important than another, where a single-issue group may be able to do so. A number of the stronger comments have been made as if it is in the power of Bath and North East Somerset Council to isolate one issue and not consider the impact of that on other issues it also has responsibilities for.

The following takes account of the complexity of this position whilst focussing the assessment on the fact that the bank is owned by Bath and North East Somerset Council and, therefore, they have the responsibility for providing uses which fit *their* responsibilities and liabilities. If other parties owned / were responsible for the site, the recommendations of the following assessment may well be different.

4.2 Assumptions

There are a number of unknowns which will need consideration prior to any option finally being put into place. However, in order to give a pragmatic and useful assessment of the options that were part of the engagement process, the following has been assumed. In order to be considered as an option, ultimately, each option must be,

- Legal
- Viable
- Deliverable
- Fit for purpose

Any option that fails these tests should not be evaluated through the options process. At this point it cannot be *definitively* stated that any of the proposed options fail these tests, however there are questions on *all* options around one or more of the above which will need remedial action before being finally decided upon. A short discussion around the meaning of the assumptions is below. The prior actions are discussed in the Recommendations section.

4.2.1 Legal

The legal requirements referred to here are mostly regarding the enforcement measures which will need to be put in place. It is assumed that whichever option is chosen, that the resource can be found, and adequate enforcement expedited. Many comments (from all user types) were made around how *adequate* enforcement measures were needed. For the boating fraternity, for example, this may be appropriate enforcement of stays; or if a non-mooring option is ultimately decided upon, then how trespass is avoided through illegal mooring, for example.

4.2.2 Viable

There have been a number of submissions which have set out that the stability of the bank is under question. Quoted engineering assessments have included that taking place in 2005. This assessment is now 14 years old and was undertaken for a different purpose (road stability) than those under consideration here. Given the speed of the river and the use of the bank since (not that considered in that assessment), it would be a practical and pragmatic step to undertake an independent engineering assessment of *all* of the uses under question here. The condition of a riverbank changes over time and Mead Lane is no different. Any safety considerations in this regard applies to *all* potential future uses and despite some public concern, it is an *independent* and professional view that would be appropriate in assessing the potential of the bank.

In addition, in considering a more public use, perhaps as a Local Natural Reserve, as has been suggested, there are particular issues which might create concern for those responsible for the liabilities of bank. In addition to the above engineering assessment, an independent risk assessment for such a use would be appropriate. Having a public road on one side and the river on the other, amongst other things, creates several risk factors which need to be seriously considered.

4.2.3 Deliverable

All options under consideration need to be deliverable if they are ultimately chosen. All contain an element of finance and/or resource to do so. Identification of this is necessary; if the finance/resource cannot be found for an option, then it cannot be recommended.

4.2.4 Fit for purpose

The evaluation concerns a particular piece of land. The place must be appropriate to uses being assessed. To some extent, these uses are assessed as being viable, as discussed under the previous section. However, the site being fit for purpose also applies to uses such as a local green space or a nature reserve. Elements such as the wider road network, safety or that there are other local nature reserves nearby may negate the cost-benefit of providing another similar use when public money may be better spent elsewhere which has more potential for that use. This assessment is beyond the scope of the brief but needs considering.

4.3 What are the criteria against which to measure the options?

In considering the criteria against which the options are measured, they were drawn from the common issues in the consultation process and those driven by the duties and responsibilities of Bath and North East Somerset Council.

These criteria were:

- Peaceful Enjoyment
- Biodiversity
- Access for All
- Finance
- The duties of Bath and North East Somerset Council

These criteria, where appropriate, were broken down further (below, Section 4.5)

4.4 Criteria weighting

Working with Bath and North East Somerset Council, in order to understand their priorities, each of these criteria was given a weighting under which the options could be assessed. The following sets these out:

- Peaceful Enjoyment – 50%
- Biodiversity – 25%
- Access for All – 30%
- Finance – 60%
- The duties of Bath and North East Somerset Council – 70%

4.5 Criteria Breakdown

To help refine, define and weight any attributes of the specific criteria, the evaluation broke down as follows

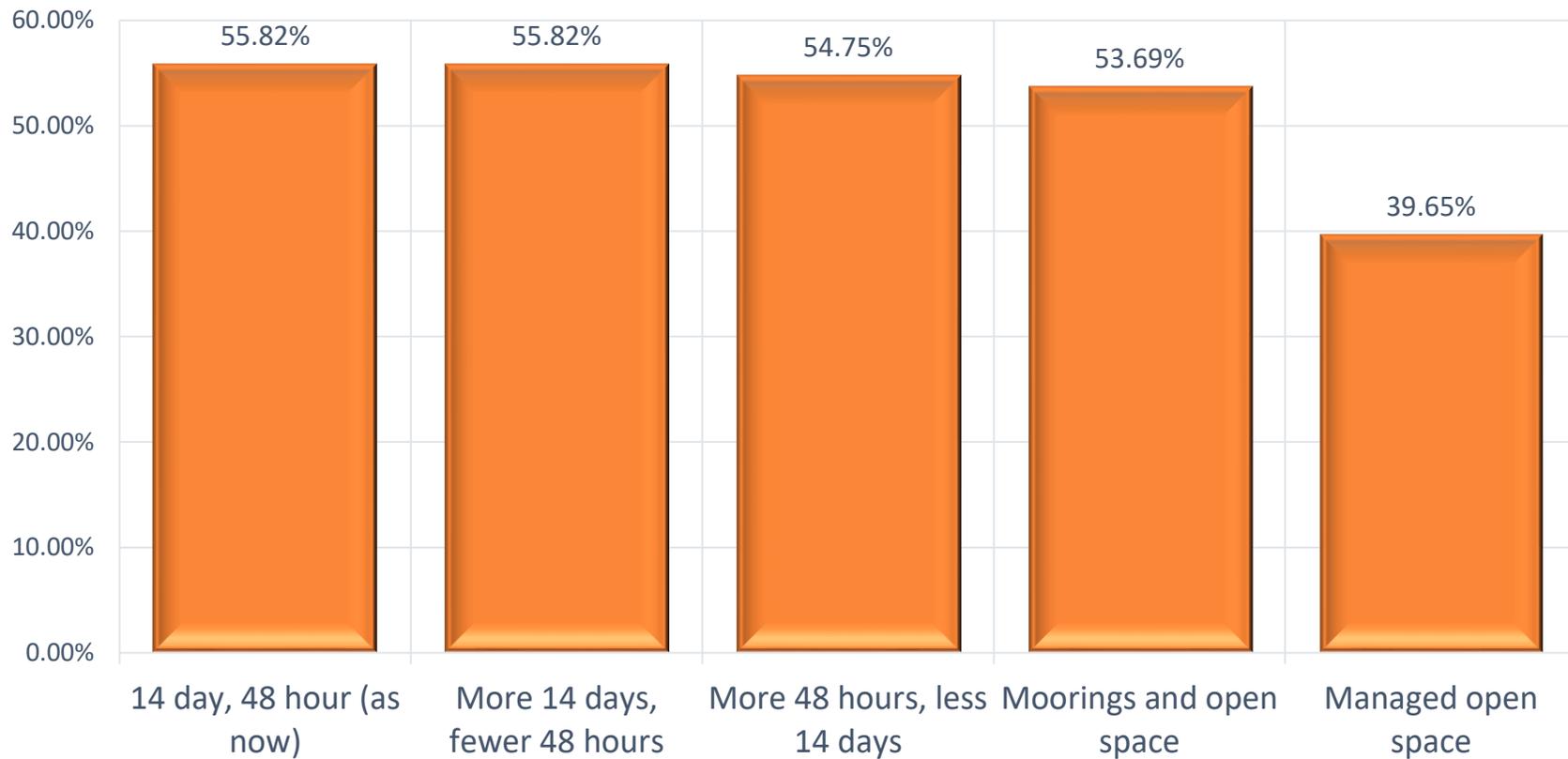
- Peaceful Enjoyment – informal use
- Biodiversity – Management of habitats
- Access for all – attribute weighting evenly split between water based and land based
- Finance – cost of enforcement (weighting of this attribute x2 compared to the other attributes under this criteria), capital cost to deliver, ongoing maintenance
- Owner's Duties – Legal risk (x3 weighting of attribute under this criteria), reputation, homelessness (x2 weighting of attribute under this criteria)

4.6 Scoring the Options against the Criteria

There were no further options under the engagement process that were outside of the Options already suggested.

Taking each option in turn, each were given a score as to how well each did against criteria / attributes. These scores were then calculated, taking account of the weightings of attributes within the criteria and the overall criteria weighting. Below is the summary of this Scoring (set against an idealised perfect score). It should be noted that the question “close all moorings on Mead Lane” is not an option of itself as it is a negative statement.

Overall preference against maximum possible score



5 Conclusions and Recommendations

5.1 Proviso

There were several assumptions set out at the beginning of the evaluation which could alter the options' consideration. These applied to all the options. The safety of the bank itself could be vital in the assessment of any of the potential uses as well as the ongoing use of the road. Therefore, an up-to-date, independent engineering assessment of the condition of the bank (above and below waterline) would be a practical step. This may result in a reassessment of options to incorporate the additional cost of repair (if applicable) or other works to expedite a particular option. Similarly, a risk assessment of options may also be required under the "fit for use" elements and may exclude or create an additional cost of amelioration, as appropriate.

It is suggested that these assessments will need to be put into place prior to action being undertaken on the recommendations of this report, or that a "subject to" decision be made.

5.2 Option Recommendation

The Options that scored equally were those of retaining the 14 day and 14 hour Mooring (as now) or having more 14 days / fewer 48 hour moorings. That said, the other two Moorings options were not dissimilar in scoring. Whilst these were the more favoured scoring options, it is important to note that all of these options had very large numbers of comments from all sectors answering the consultation about the need for effective independent enforcement and management. Many of the present issues stemmed from the issue of enforcement on a number of levels. It is beyond the scope of this report to detail how such measures should be made but many of the issues that would underlie those comments described under the following Sections of this report:

- Enforcement to eliminate overstays (3.2.12)
- Parking and Road Issues (3.2.13)
- Pollution, littering, flytipping and Waste (3.2.14)

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Appendices

Consultation Report and Option Analysis

Mead Lane Moorings, Saltford

November 2019

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APPENDIX 1 – Q1 - Age Groups

What is your age group?

| Answer Choices | Responses | |
|----------------------|-----------------|-------------|
| Under 18 | 0.32% | 4 |
| 18-24 | 1.77% | 22 |
| 25-34 | 10.03% | 125 |
| 35-44 | 19.50% | 243 |
| 45-54 | 19.98% | 249 |
| 55-64 | 21.03% | 262 |
| 65+ | 24.40% | 304 |
| Prefer not to answer | 2.97% | 37 |
| | Answered | 1246 |
| | Skipped | 5 |

APPENDIX 2 – Q2 - Gender

Are you:

| Answer Choices | Responses | |
|-------------------|-----------------|-------------|
| Male | 49.92% | 620 |
| Female | 46.86% | 582 |
| Prefer not to say | 3.22% | 40 |
| | Answered | 1242 |
| | Skipped | 9 |

APPENDIX 3 – Q3 - Postcodes

A3.1 Number of responses from each postcode

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| BS31 3ep | 33 |
| BS31 3ez | 24 |
| BS31 3eg | 21 |
| BS31 3ej | 20 |
| BS31 3al | 18 |
| BS31 3ed | 18 |
| BS31 3ER | 16 |
| BS31 3AD | 14 |
| BS31 3HL | 14 |
| BS31 3dy | 12 |
| BS31 3bq | 11 |
| BS31 3dw | 10 |
| BS31 3hp | 10 |
| BS31 3lb | 10 |
| BS31 3jp | 9 |
| BS31 3jq | 9 |
| Bs31 3ab | 8 |
| BS31 3be | 8 |
| Bs31 3bw | 8 |
| BS31 3dx | 8 |
| BS31 3ef | 8 |
| BS31 3HR | 8 |
| Bs31 3ag | 7 |
| BS31 3AP | 7 |
| BS31 3bu | 7 |
| BS31 3DT | 7 |
| Bs31 1st | 6 |
| Bs31 3ah | 6 |
| BS31 3aq | 6 |
| BS31 3AW | 6 |
| BS31 3bh | 6 |
| Bs31 3BP | 6 |
| BS31 3dp | 6 |
| BS31 3la | 6 |
| BS31 3ls | 6 |
| Ba1 3JT | 5 |
| BS31 1GB | 5 |
| Bs31 2aj | 5 |
| BS31 3AU | 5 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| Bs31 3bg | 5 |
| BS31 3DN | 5 |
| BS31 3jh | 5 |
| BS31 3jj | 5 |
| Bs31 3jn | 5 |
| BS31 3jw | 5 |
| BS31 3lg | 5 |
| BS31 3ln | 5 |
| Bs31 3lw | 5 |
| Ba2 0lt | 4 |
| BS30 6EA | 4 |
| Bs31 3bj | 4 |
| BS31 3dh | 4 |
| BS31 3JG | 4 |
| BS31 3LE | 4 |
| BA1 1SU | 3 |
| BS30 6SW | 3 |
| BS31 3AS | 3 |
| BS31 3AY | 3 |
| BS31 3ba | 3 |
| BS31 3BD | 3 |
| BS31 3BN | 3 |
| Bs31 3bs | 3 |
| BS31 3bx | 3 |
| BS31 3DF | 3 |
| BS31 3dg | 3 |
| BS31 3DL | 3 |
| BS31 3du | 3 |
| BS31 3eh | 3 |
| BS31 3en | 3 |
| BS31 3eu | 3 |
| BS31 3ew | 3 |
| BS31 3EX | 3 |
| BS31 3hn | 3 |
| Bs31 3hx | 3 |
| BS31 3LF | 3 |
| BS31 3lj | 3 |
| BS31 3lq | 3 |
| Bs31 3tq | 3 |
| BA1 2PZ | 2 |
| Ba1 3rp | 2 |
| Ba1 5hh | 2 |
| Ba1 6tp | 2 |
| BA12 6DZ | 2 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| BA14 5RS | 2 |
| Ba2 6qp | 2 |
| BA2 7BJ | 2 |
| Ba2 8hn | 2 |
| BS1 6SR | 2 |
| BS30 9AD | 2 |
| BS31 1JN | 2 |
| Bs31 1td | 2 |
| Bs31 1tg | 2 |
| BS31 1XD | 2 |
| BS31 2DH | 2 |
| BS31 3AA | 2 |
| Bs31 3af | 2 |
| BS31 3AT | 2 |
| Bs31 3az | 2 |
| Bs31 3bt | 2 |
| BS31 3by | 2 |
| BS31 3BZ | 2 |
| BS31 3DJ | 2 |
| BS31 3DS | 2 |
| BS31 3ES | 2 |
| BS31 3ET | 2 |
| BS31 3ey | 2 |
| Bs31 3ht | 2 |
| BS31 3hw | 2 |
| BS31 3JL | 2 |
| BS31 3jr | 2 |
| BS31 3LD | 2 |
| Bs36 1hq | 2 |
| BS39 5AG | 2 |
| BS4 4EP | 2 |
| Bs5 6ja | 2 |
| SN10 1ss | 2 |
| AI5 1lz | 1 |
| B78 3SE | 1 |
| ba1 2bn | 1 |
| Ba1 2ne | 1 |
| BA1 2QA | 1 |
| Ba1 3es | 1 |
| BA1 3JQ | 1 |
| Ba1 3lh | 1 |
| BA1 4DX | 1 |
| BA1 4ee | 1 |
| BA1 4LH | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| Ba1 5bw | 1 |
| Ba1 5hy | 1 |
| BA1 6BG | 1 |
| Ba1 6df | 1 |
| BA1 6DZ | 1 |
| BA1 7AW | 1 |
| BA1 7NJ | 1 |
| BA1 7QU | 1 |
| BA11 1NT | 1 |
| Ba11 5lf | 1 |
| BA12 9PU | 1 |
| BA14 6JT | 1 |
| Ba15 1EJ | 1 |
| BA15 1TY | 1 |
| Ba15 2ea | 1 |
| Ba2 0je | 1 |
| Ba2 0pr | 1 |
| BA2 1AZ | 1 |
| BA2 1SJ | 1 |
| Ba2 2bb | 1 |
| Ba2 2ee | 1 |
| Ba2 2hy | 1 |
| BA2 2PG | 1 |
| BA2 3DL | 1 |
| Ba2 3ge | 1 |
| BA2 3QZ | 1 |
| ba2 3ra | 1 |
| BA2 4SE | 1 |
| Ba2 5dw | 1 |
| Ba2 6sn | 1 |
| ba2 6sy | 1 |
| BA2 6TS | 1 |
| Ba2 6xd | 1 |
| BA2 7EE | 1 |
| BA2 7SU | 1 |
| BA2 7WW | 1 |
| BA2 8ST | 1 |
| ba2 9hp | 1 |
| BA3 2AX | 1 |
| Ba3 2tz | 1 |
| Ba3 2un | 1 |
| BA3 4JX | 1 |
| BA3 4NN | 1 |
| BA5 2FW | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| BD16 3HP | 1 |
| Bh20 4HY | 1 |
| bs1 1ea | 1 |
| bs1 4rb | 1 |
| BS1 5jr | 1 |
| BS1 5sr | 1 |
| Bs1 6gw | 1 |
| Bs1 6jn | 1 |
| Bs1 6ju | 1 |
| BS1 8NQ | 1 |
| Bs11 9xx | 1 |
| BS13 0QL | 1 |
| bs14 8jt | 1 |
| bs14 9lu | 1 |
| BS15 1LP | 1 |
| BS15 3NU | 1 |
| BS15 3SL | 1 |
| BS15 4NH | 1 |
| BS15 4UQ | 1 |
| Bs15 9ng | 1 |
| BS15 9UN | 1 |
| bs16 1ql | 1 |
| BS16 2AB | 1 |
| Bs16 3pw | 1 |
| Bs16 3sl | 1 |
| BS16 4EW | 1 |
| Bs16 5ae | 1 |
| Bs16 5ju | 1 |
| Bs16 6wd | 1 |
| BS16 6XG | 1 |
| BS16 7BF | 1 |
| BS16 7ER | 1 |
| BS16 9DT | 1 |
| Bs16 9sw | 1 |
| bs2 8dt | 1 |
| BS2 8QW | 1 |
| Bs2 8ud | 1 |
| BS2 8YA | 1 |
| BS2 9XL | 1 |
| bs2 9yg | 1 |
| BS2 9YT | 1 |
| BS20 7LQ | 1 |
| BS30 5WA | 1 |
| bs30 8bq | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| BS30 9DG | 1 |
| BS30 9QS | 1 |
| bs30 9ue | 1 |
| BS31 1AH | 1 |
| BS31 1bq | 1 |
| BS31 1DE | 1 |
| Bs31 1ez | 1 |
| BS31 1FQ | 1 |
| Bs31 1jd | 1 |
| BS31 1JJ | 1 |
| BS31 1JS | 1 |
| BS31 1LL | 1 |
| BS31 1NB | 1 |
| bs31 1nd | 1 |
| BS31 1PH | 1 |
| bs31 1pr | 1 |
| BS31 1PW | 1 |
| Bs31 1re | 1 |
| bs31 1rh | 1 |
| BS31 1SB | 1 |
| BS31 1SG | 1 |
| Bs31 1tp | 1 |
| BS31 1UJ | 1 |
| Bs31 1xg | 1 |
| BS31 2DD | 1 |
| Bs31 2dl | 1 |
| BS31 2EA | 1 |
| BS31 2EF | 1 |
| Bs31 2fh | 1 |
| BS31 2GG | 1 |
| Bs31 2lb | 1 |
| BS31 2RE | 1 |
| Bs31 2sb | 1 |
| Bs31 2ue | 1 |
| Bs31 2un | 1 |
| Bs31 2wb | 1 |
| BS31 3AE | 1 |
| BS31 3AJ | 1 |
| Bs31 3AM | 1 |
| Bs31 3an | 1 |
| BS31 3ar | 1 |
| BS31 3AX | 1 |
| BS31 3BF | 1 |
| BS31 3BL | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| Bs31 3dq | 1 |
| BS31 3DR | 1 |
| BS31 3dr | 1 |
| BS31 3EL | 1 |
| BS31 3EQ | 1 |
| BS31 3HG | 1 |
| BS31 3HQ | 1 |
| BS31 3HY | 1 |
| Bs31 3jf | 1 |
| BS31 3JS | 1 |
| BS31 3LH | 1 |
| bs31 3ll | 1 |
| BS31 3SX | 1 |
| BS31 3TJ | 1 |
| BS32 0DU | 1 |
| BS35 3LR | 1 |
| bs37 4fr | 1 |
| Bs37 6ng | 1 |
| Bs39 5bu | 1 |
| BS39 5QE | 1 |
| BS4 2DX | 1 |
| bs4 2et | 1 |
| BS4 2PH | 1 |
| Bs4 4an | 1 |
| Bs4 4nu | 1 |
| Bs4 4ph | 1 |
| Bs4 5ae | 1 |
| BS40 8XW | 1 |
| BS48 2UL | 1 |
| BS5 0ar | 1 |
| Bs5 0hn | 1 |
| BS5 0LB | 1 |
| Bs5 1ud | 1 |
| Bs5 6bn | 1 |
| Bs5 6bz | 1 |
| Bs5 6eu | 1 |
| BS5 6EZ | 1 |
| Bs5 6hz | 1 |
| BS5 6JB | 1 |
| BS5 6JS | 1 |
| Bs5 6jt | 1 |
| BS5 6LB | 1 |
| bs5 6sb | 1 |
| Bs5 6uf | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| Bs5 6xf | 1 |
| Bs5 7lz | 1 |
| BS5 7PA | 1 |
| bs5 7qx | 1 |
| BS5 8PW | 1 |
| BS5 9LQ | 1 |
| Bs5 9rn | 1 |
| BS6 8ED | 1 |
| Bs7 0tf | 1 |
| Bs7 8rd | 1 |
| Bs7 8uf | 1 |
| BS7 9AP | 1 |
| Bs7 9pb | 1 |
| Bs7 9qt | 1 |
| Bs7 9sy | 1 |
| Bs9 4dt | 1 |
| CF14 9JF | 1 |
| Cf35 5et | 1 |
| ct6 5pz | 1 |
| CW10 0NA | 1 |
| Cw9 6es | 1 |
| De65 6dw | 1 |
| Dn17 3ef | 1 |
| EH41 3QF | 1 |
| Gl12 8qe | 1 |
| Gl2 7la | 1 |
| Gl7 1ss | 1 |
| GL8 8TE | 1 |
| Gu51 1hl | 1 |
| HP1 2RX | 1 |
| le16 7rw | 1 |
| me17 1ex | 1 |
| NG25 0FX | 1 |
| NN4 0UH | 1 |
| NP11 5AL | 1 |
| np16 6qg | 1 |
| np25 4lu | 1 |
| OL15 9PS | 1 |
| Ox16 0bw | 1 |
| Po12 4jd | 1 |
| Rg14 5jh | 1 |
| RG14 7AW | 1 |
| RG6 7BP | 1 |
| sg14 2as | 1 |

| Postcode (whole postcodes listed) | Number of responses from postcode |
|--------------------------------------|--------------------------------------|
| SL6 8TW | 1 |
| SL6 9RQ | 1 |
| Sn10 1eb | 1 |
| sn10 1ey | 1 |
| SN10 2RH | 1 |
| Sn11 0ft | 1 |
| SN11 0RG | 1 |
| SN12 8LD | 1 |
| Sn12 8qp | 1 |
| SN13 9XW | 1 |
| SN14 8BS | 1 |
| Sn15 2na | 1 |
| SN6 6LU | 1 |
| SN8 2DT | 1 |
| SN9 5NT | 1 |
| SN9 6AJ | 1 |
| Sp11 7ns | 1 |
| SP2 0PJ | 1 |
| Sp2 9dg | 1 |
| SW9 6AU | 1 |
| SY18 6BA | 1 |
| Ta4 2qu | 1 |
| TA6 6DJ | 1 |
| TQ7 1AP | 1 |
| TR1 1AT | 1 |
| TR17 0DW | 1 |
| TW11 9QZ | 1 |
| Ub4 9ta | 1 |
| W4 3RL | 1 |
| Wd3 4ln | 1 |
| YO42 2TH | 1 |

A3.2 Postcode responses written as narrative

Narrative answers

Bristol harbour winter mooring in winter, River Avon on CRT River-only licence in summer
 Currently moored at Mead lane Saltford
 Prefer not to say where my boat is moored thank you
 River Avon/ K&A Canal
 River Avon and Kennet and Avon Canal
 saltford
 Bristol
 SaltfordMarina

Narrative answers

None - currently with boat in transit
Bathampton
Darlington Warf
Bath
Milk island Saltford
Swineford
Dundas
Dundas aqueduct
mead lane
Horsenden Hill Farm, Perivale,London
Saul
Near Dundas aqueduct
Dundas
Devizes
Caen Hill marina Devizes
Cheshire
Bradford on Avon - boater without a home mooring
Kennet and Avon Canal
Saltford marina
Continually cruising
Boat moored at Semington
Bradford on Avon
Keynsham
Bradford
London
Bath
Continuous Cruiser
Bath
Continuous cruiser. Current location Hanham Mills
Bradford on Avon
Bristol
River lee
Bradford on Avon
Continuous cruising
Brentford
Continuous cruiser
Keynsham
kanda canal
Bradford on Avon
Keynsham
Bath
Bathampton moorings
Avoncliff
Nr Saltford
Brass mill moorings Saltford

Narrative answers

All Cannings, Wiltshire
Keynsham Marina
Sharpness
Continuous cruiser, Jenner and Avon
Bath
Bath
River Thames
Saul
Portavon marina
BA2 Bathampton
All Cannings
Bradford on avon
Saltford
Keynsham
Dundas Aqueduct
Kelson
Claverton
Pewsey
Newbury
Bath
Caen hill
Bathampton
Caen hill Marina
Pewsey
On the Thames at the moment
Mooring at Newbridge Bath
Bath
Salford Mead Lane
Sells green
Continuous cruiser
Keynsham lockkeeper pub
Bathampton
Great Bedwyn
bath
Saltford
Bathampton
Caen hill marina
Bristol Marina
OL15 9PS but I am out travelling the country
Widcombe on the K&A
bath
Bathampton.
Saltford
Continuous cruiser,currently in Nuneaton
bathampton

Narrative answers

Banbury
Bathampton
Bath
Wilcot, Wiltshire
Bath
14 day mooring in Mead Lane.
Bristol
Seend Cleeve West bound
Devizes (continuous cruising boat)
Frouds Bridge Marina
Continuous Cruiser / postal postcode ba2 6uz
Saltford marina
Cropredy
Mead lane saltford (private mooring)
Newbury Marina
Devizes Marina.
Continuous cruiser on K&A - currently near Bradford on Avon
Semington
Continuous cruiser
Bath
Keynsham
Ely
Great Ouse
Oxford canal
Bristol harbor
Continuous cruiser
Stourport on Severn
Bradford on avon
Braunston Marina
Long term cruising (not long term mooring!)
Bristol harbour
Gloucester
Nottingham
constant cruiser
Bath
Mead Lane
Continuous cruiser of UK canal system
Mooring at the end of Broadmead Lane, Keynsham on the river Avon.
Bishops Cannings n
Saltford Marina
Mead Lane, Saltford
Bath
Portavon
Lapworth
Continuous cruiser.

Narrative answers

Braunston, Northants.
Saltford
Bradford-on-Avon
Cruising on Kennet and Avon
Semington
Bristol Harbour
Saltford Marina
BS31 2DD Portavon Marina
Bath
BS31 the Shallows
East of Saltford Marina
River Avon / Kennet & Avon Constant Cruiser
Claverton
Bathampton
Claverton pumping Station. Kennet and Avon canal
Bradford on Avon
Hilperton - continuous cruiser
k&A
Bathampton
Bristol
Semington
Keynsham
Cropredy
Bathampton
Coventry
Continual cruiser
CORSTON
Devizes
Bradford on Avon
Honeystreet
Bath
Pewsey
Great Bedwyn
Hanham Mills
Keynsham BS312AJ
Saltford Marina
Kennet and Avon canal
Portavon marina keynsham
Chandos lodge moorings
Bitton
Bath

APPENDIX 4 – Q4 - Interests

| Are you: | | |
|-------------------------------------|-----------------|-------------|
| Answer Choices | Responses | |
| A boat resident | 22.99% | 266 |
| A permanent Saltford resident | 50.48% | 584 |
| A representative of an organisation | 3.37% | 39 |
| Other | 23.77% | 275 |
| Other (please state) | | 270 |
| | Answered | 1157 |
| | Skipped | 94 |

Narrative Answers – Other (please state)

use to fish

Saltford Marina

A local visitor to the area

Ex boater

Resident of Bath and North East Somerset

SCA

Boat opener

Chair, Avon & Wilts Inland Waterways Association

Visitor

A walker

Commodore of Bristol Avon Sailing Club

Land owner

Saltford Marina

Local resident

Walk around the area

My family home is in Saltford

A local resident who is concerned about the detriment to our environment and the impact on its wildlife.

Kennet and Avon Boaters Action Group

Frequent visitor who previously was able to appreciate and enjoy this natural environment.

The Chequers Inn Hanham

A regular weekly walker in that area

Work in premises on Mead Lane

I own a boat at the Marina

Bristol leisure boat owner

K and A Trust

Cyclist and walker

Fisherman

Local resident

Fisherman

Angler Wildlife photographer

Narrative Answers – Other (please state)

Keynsham resident

Bristol U3A

former Saltford resident now living nearby

Business in Saltford

River User

B&NES employee

Concerned public

Local resident

Student Social Worker

Sailor at Bristol Avon sailing club

Kayaking from Salford shallows

regular visitor to the area

Fisherman

Angler

Fisherman

I lived in Saltford for 20 years and moved to Keynsham 2000

Sailing club member

Regulat visit

River User

Use sailing club

Used to live by river and still love and visit the area regularly

Have a mooring at mill island Saltford

Visitor from Keynsham

I like fishing and go to pub sometimes

Angler

I used to live in Saltford and visit this area a lot.

Campaign to Protect Rural England CPRE

I live nearby and often walk in the area. I visit the pub.

President of Keynsham Angling Association

resident of keynsham

Ex boater, now settled resident of Bath

Honorary Secretary keynsham Angling association(450members)

VISITOR TO THE AREA

local who uses the river for fishing

A visitor

VISITOR

Resident in Willsbridge South Gloucestershire

Bristol & West of England Federation of Anglers

a boat user

Visitors

Visitor

Narrative Answers – Other (please state)

Walker

casual boater

Stand up paddle board user

regular river user

Regular Visitor

Regular visitor to area

Visitor

A Bristolian who has always visited this area.

Local resident

Local

Bath Resident

fisherman

Narrowboat owner

Visitor.

Local person who appreciates the value of the boat community to the area.

Friend of somebody moored there

A cyclist who enjoys the area

I use the cycle path and enjoy visiting this area to relax

Bath resident

I have loved on board in the past and I currently live in a house in bristol

Ex boater

Frequent visitor to photograph wildlife

Previous boat owner, now resident of Keynsham

Professional inland waterways Skipper in Bristol & Bath area.

Bath resident

Visitor

Visitor to boating family

Local

Resident in Bristol but used to live on a boat near Bath

An ex boater

Visiting local

Ex live aboard, now recreational boater

Fellow boater

Person who enjoys visiting the area

Hiker

Friend

Friend

Stay 1 or 2 nights a week on boat

summer boater

Previous boat owner, live aboard.

Live close by and work close by

Live in Bath

A regular walker in the area

Boat owner

Narrative Answers – Other (please state)

A canal boat enthusiast

A friend of someone who lives on a boat

Bath resident

A regular river user

home owner who uses the river for walks

Saltford Marina

Friend of the residents

Boat owner

frequent visitor

Boat owner

Frequent Visitor

Professional

Angler

Saltford Resident

48 yrs in Saltford. Now just moved to Keynsham

Nature enthusiast

We stay at Mead Lane regularly

Saltford Environment Group

A Keynsham resident with an interest in local environmental issues

Resident in house

Recreational boat owner

former boat resident

High use leisure user 4 days per week average

Citizen

boat weekender

Walker

Occasional visitor

Live on a boat

Continuous cruisers

Fishing

Bristol Avon Sailing Club

Have been a boat resident

Bristol Avon Sailing Club

Member of Bristol Avon Sailing Club - I have been sailing on this stretch avon for 7 years+

Boat resident in Keynsham

Rambler

river leisure user

Dog walker

Not sure what boat resident means? I live on a boat

Keynsham resident

Boat owner

Walker swimmer and canoeist

BASC

Member of Bristol Avon Sailing Club

Narrative Answers – Other (please state)

Saltford Community Ass. Saltford Brassmill Project Saltford Wombles

Not relevant

house dweller next to the k&a canal

Friend

Regular visitor to boating families who moor at mead lane

Boat owner

Bath Boys' Brigade

Ex Saltford now Keynsham

Saltford WI

Visitor

Born in Saltford, I regularly visit my parents who live there

Saltford Primary School

Walker

Boys' Brigade

I am a course a angler who likes to fish at mead lane.

Boat owner

A walker

Frequent visitor to saltford

Boat owner who visits K&A canal occasionally

Keynsham resident

Part-time Saltford Resident

A regular river user at least twice weekly

Sailing Club member

SCA WI

boat owner (leisure)

Boater

Leisure Boat Owner

Leisure boater

Saltford business owner

Live locally and visit often

Canal boat user

Concerned boater upholding mooring facilities

Boat owner

Boat owner

A travelling boat owner

Narrowboat owner with permanent offline mooring

A permanent Saltford resident who lives on a boat

Boat owner and regular cruiser

Previously moored at Saltford Marina

frequent visitor to Mead Lane

Regular jogger and cyclist along the canal path

a Canal & River Trust boat licence holder

Boater

Holiday boater

Narrative Answers – Other (please state)

Visitor

A leisure boat owner

Leisure boater

Leisure boater

Saltford Parish Council

Dog walker and paddler with Bristol Empire Dragons

tourist

Keynsham resident

I am a leisure boater (ie: I don't live on the boat, but I do use it for several weeks each summer during which time I travel extensively - including visiting locations such as Saltford.

boat yard owner

Live locally

member of the narrowboat trust

Work close by.

Local business, Keynsham resident.

Avon and Somerset Police

Boat owner

Boat owner

Boat owner

Boat owner

Often walk along the river. Used to live in Saltford but now in Keynsham.

Recreational water user

Also we own the land in mead lane that is next to spion kop

Frequent visitor to the area (relatives in Saltford)

Constant cruiser on kennet and avon

Some

Resident of banes who uses the area

Leisure boater

Boat resident and also work in the area

Local resident

Local person who was born and grew up in Saltford

Regular visitor and ride leader who leads cycle rides in then area

Honourary Member of Bristol Avon Sailing Club

A local walker

Canal volunteer

Member of the sailing club

Live in Bath

walker

Regular visitor

Pleasure boat user

Bristol Avon sailing club

User of river for canoeing and walking

Visitor

Dog walker

Narrative Answers – Other (please state)

A local BANES council ward resident who regularly uses the riverbank as a local amenity

Regular visitor

Leisure boater

A regular sailor at Bristol Avon Sailing Club

A local business - iTeam Solutions Ltd

Visitor for recreation

I visit on a regular basis and was fromn the Bristol area

Member of Bristol Avon Sailing Club

Looking for a mooring

Visitor and member of BASC

Regular visitor

Recreational user

Member of Bristol Avon sailing club

Recreational boater

Committee member at Bristol Avon Sailing Club

Worker in Saltford

Saltford Community Association

friend of a boater

A regular visitor

Regular visitor

Bristol Avon Sailing Club

APPENDIX 5 – Q5 – How often do you Visit Mead Lane / The River Avon at Mead Lane, Saltford?

How often do you visit Mead Lane/the River Avon at Mead Lane, Saltford? (select the answer that most closely applies to you)

| Answer Choices | Responses | |
|--|-----------------|-------------|
| I live on Mead Lane | 4.25% | 49 |
| Daily | 5.46% | 63 |
| Twice a week | 11.36% | 131 |
| Weekly | 21.51% | 248 |
| Monthly | 27.41% | 316 |
| Rarely | 14.66% | 169 |
| If mooring please specify your approximate number of visits per season | 15.35% | 177 |
| | Answered | 1153 |
| | Skipped | 98 |

If mooring, please specify your approximate number of visits per season

6 to 8

2 visits per year

2

varies between 1 and 10

Hanham Weir - we are situated on it.

2

1 or 2

4

3

twice a year for two weeks at a time. In addition I will occasionally use the short stay mooring for an evening at one of the pubs

Once a year

1

X2 visits on way to and from Bristol winter mooring

4

1

it varies, between two and four times a year mostly in summer probably 2 year

Once or twice per year

2

One two week visit per season

One two week visit

1

6

5

If mooring, please specify your approximate number of visits per season

2

2 x 14 days

Two to four

Average once or twice a year

2

3

1

6

2

2

5-6

5

i live near mead lane

2

2

2

2

1

2

1-2

once or twice a year

2

2

1

7

4-8

4/5

2 visits each summer

One or two

2 visits per year

Twice per annum

Yearly

Once or twice a year

2 - 3

2 or 3 times a year for one or two nights

2 - 3 times a year

2-3

2

2

2-3

5

2

one visit a year (for up to 14 days)

4

If mooring, please specify your approximate number of visits per season

Approx once every two years

V

2

Twice a year

1

Once every two years for 2 weeks

8

3

2

4 weeks a year

2

3

1 or 2 times, but stay 2 weeks

2

1

2

2

We come on to the river for about 2 months in the summer and visit Mead lane a couple of times in that period

6

5

1

4

2

1

Never found space but might like to stop there for a night.

1

0.4

1

1

4

2 x 2 weeks

I have visited three times this summer, twice for two days and once for two weeks.

1

1

2

2

Once or twice a year

1

3-4

2

1-2

4

3

If mooring, please specify your approximate number of visits per season

Once or at most twice a year, for up to two weeks at a time

Every 3 to 4 months

1

2

Three times in 5 years

Occasional visitor by river - every few years I'll be in the area for 2-3 weeks

3-6 from May to November

3

2

twice a year

once or twice during the summer months

2

When ever I visit that part of the K&A

2

Two or three

1

1

2

1-2

3

1

Once per year

2 visits per year

Stayed once last year for 2 nights

Once or twice per year

1

1

2

1 maybe 2 per year

Mooring occasionally in summer, visit monthly for recreation

2

2

Twice a year

I moor regularly on Mead Lane

1

4

2

Once this year. Lovely.

3

We visit and Moor at mead lane for 2 weeks about 3 to 4 times a year in the summer months. It is one of a few SAFE 2 WEEK! moorings we can go to on the river Avon With a baby. Getting rid of these 2week mooring would be horrendous

2-3 times per year (max 2 week stay)

2 visits per year

If mooring, please specify your approximate number of visits per season

Once per year

2

3/4

1

1

2

2

Once per 12 months (for two weeks)

2

2

2

Once

3-4

once/year for two weeks

2

1

1

once/twice per year

6

1

3

2 visits per season. Usually for 24/48 hours

4

4

APPENDIX 6 – Q6 – What do you do at Mead Lane / the River Avon at Mead lane

What do you do at Mead Lane/ the River Avon at Mead Lane? (Tick all the boxes that apply)

| Answer Choices | Responses | |
|-----------------------------|-----------------|-------------|
| I live there | 6.25% | 72 |
| Walking | 69.70% | 803 |
| Fishing | 5.90% | 68 |
| Mooring a boat | 25.52% | 294 |
| Sailing / canoeing / rowing | 12.24% | 141 |
| Day trips / picnic | 20.75% | 239 |
| Cycling | 28.21% | 325 |
| Other | 15.80% | 182 |
| | Answered | 1152 |
| | Skipped | 99 |

Narrative Responses – Other (please specify)

Visiting the local pubs

Bird watching

Day trip sometimes in our boat

Dog walk and pass to walk to local pub

Dog walking

Visiting the pub for lunch

Running

Visiting pubs

ORNITHOLOGY

Swimming

Visit Jolly Sailor pub

I leave it undisturbed so as to have no detrimental impact.

painting and drawing

Visiting friends who live in Mead Lane.

Dog walks, general relaxation as there's not many quite calm places left around!

Work in office/workshop in Mead Lane

taking photographs / visits to local pub / walking the dog

Visit friends go to the pub

Visit friends/go to the pub

Enjoying a nice day out! Or with friends when they visit

Running

Going to JollySailor pub

Try to photograph otters. impossible for the last two years

Visit pub

Sewage treatment works at strategic waste infrastructure

Narrative Responses – Other (please specify)

Pub

to enjoy the countryside and the quiet

Riding

Paddle boarding

Somewhere to walk and visit

sitting in car to look at view

My customers use Mead Lane

Visiting the Jolly Sailor pub

photography

Driving my disabled husband and sitting and enjoying the peace and the view

Visit friends

Visit pub

Wildlife watching

I used to love to walk and sit quietly in this restful location but no longer can with the number of boats/vehicles and clutter which obstructs and spoils the location

visit the Jolly Sailor pub.

I visit friend who lives at Mead Lane. Visit Pub

Visit the Jolly Sailor pub

Bird watching and natural history in general

Bird watching and natural history in general

Drawing Painting Photography Bird watching Relaxing

running

visit pub

We work at a office

Visiting The Jolly Sailor Pub at the end of Mead Lane

Go to local IT business, sometimes to Jolly Sailor pub

Visit Jolly Sailor

Walking/driving to the Jolly

Watching activities with grandchild

Walk to the pub.

Work at Wessex Water lab also

allotment area at friend's house

visit a friend

visiting friends; wildlife; to and from pub

Visit friends on boats

Generally enjoying the area

Generally enjoying the area

SEEING FRIENDS

Dog Walking

Visiting a resident

Just sitting quietly

Just sitting quietly

Just sitting quietly

Just sitting quietly

Narrative Responses – Other (please specify)

Inspection of fishing places and collating information regarding illegally moored boats who do not have permission from the Duchy of Cornwall to moor.

would have liked to moor there

occasionally swimming

paddle boarding

Visiting

Visiting

Visit friends

Visit friends

Visit friends.

Visiting

Visiting friends

photography

Take visitors to enjoy the beauty of the area

Visit friends

Skippering passenger boats

Wildlife watching

Visiting my nephew and sister

Visit friends on the river

Boating between keynsham and bath

WORK

Line of work

Running. Visiting the jolly sailor

Watching the family sail

Nature sightings

We housesit and pet sit family house and pets

Photography & observing wildlife. Visiting Jolly Sailor PH.

SEG's 550+ members engage in most of the activities (& others) in the list.

belong to the sailing club, pay to keep my sailing boat there

Visit friend and pub

Enjoy life, talk to people

A vital stop to moor on journey to Bath. The distance from marina in Bristol would be too far if

Visiting

Visit the pub

Visit local pub

Business owner

Business owner

work

Visit friend

Canoe

Bird and wildlife watching. Plus bat detection at dusk

Watching birds and other wildlife

Wombling (litter picking)

Visit pub

Narrative Responses – Other (please specify)

Swimming

Visiting the Jolly Sailor pub

Running

Swimming

visit the local pub

Go past on a boat and would like to stop

Bird and wildlife watching. Plus bat detection at dusk

Running

Educational re fieldwork activities

Visiting public house

Running

Visiting resident, pub, and sailing club.

Relax in beautiful surroundings

I used to be able to enjoy the view!

Pass through on the river

Restaurant/dining

paddle board and wild swimming

continuous monitoring of wild flowers on a personal basis but willing to contribute to a formal study

Visiting friends

Visit Jolly Sailor pub

It's our cruising itinerary for next year.

Work there

Visit jolly sailor

Running

Running

Birdwatching and wildlife photography

Concerned boater upholding mooring facilities

Running

Wombling with local group and visiting the Jolly Sailor

Horse riding

I am not a regular visitor but i am aware of the scarcity of visitor moorings on the River Avon

work

work

support local shops etc

moor overnight

Pubs

Watching the river and the banks for wildlife and the flowers.

Visiting Jolly Sailor

police reassurance activity

Would like to moor up to visit places but never can as full

Local pub, Jolly Sailor

Boat stay. 1 week at a time

Running

Narrative Responses – Other (please specify)

Ride horse

Hack(horse)

Enjoying the view looking at boats

Photography

Swimming

Overnight stop

Visit jolly sailor

Visit Family

Visit my parents

Wildlife and Birds

Visit friends who are moored there

Playing with my son by the river

Farming

Running

Pub jolly sailor for drink/ food

Visit other boats

Work

We enjoy the pubs when we are moored there

Gas engineer working on boats

Work

Viewing wildlife and Walking with Grandchildren on an educational and pleasure basis

Own agricultural land

visiting friend

Running

I moor a boat only about once a year. I visit regularly at other times to walk/run/cycle, visit the pub.

Swimming

I go to the pub.

Manage the club and its grounds

APPENDIX 7 – Q7 – What do you like best about the Mead Lane location?

Narrative - Responses

The scenery

The River

The Wildlife

fishing

Views,

The Wildlife

It's picturesque & it's good to see it used by lots of different people.

I used to like the peaceful, tranquillity of the area, however this has now changed.

Quiet mooring spot with great view.

Neighbours, outlook, wildlife, peace and quiet

Neighbours, peaceful location, outlook, spotting wildlife,

The views and tranquility

Birdlife with riverine views and traditional rural landscape beyond.

A safe walking track, with access to circular walks. Possibilities of good bird-watching.

The riverside venue and the views across country. Busy some days but very peaceful on others when you can also enjoy the wildlife

Nature, peacefulness

Beautiful setting, birds, views, peace and quiet

The ambiance

To be a place of peace and tranquility

Good vibe

River / river views

The scenic views. Good area to walk

The views, the river, the wildlife, the peace - tranquility

Easy access to the riverside

Beautiful views. The dog loves to swim in the river

Tranquility and the view over the fields

Being so close to a lovely natural feature with wildlife

The beauty and seeing the water and wildlife

beautiful area and one of the best things about living in Saltford

The open environment and the river with its multitude of wild life

it is very pleasant to walk along the lane by the river, one of the advantages of living in Saltford

TRAQUIL LOCATION

Beautiful views and nature

Its beauty - the stunning vista of the river, fields and Kelston Round Hill

It is an attractive and tranquil area

Peace and quiet

Tranquility

Narrative - Responses

Beautiful scenery and the ability to see the local wildlife (flora and fauna)

Access to road / beautiful view

The riverside stretch of Mead Lane which I pass every day, always was a beautiful sight, with its views up to Kelston Round Tump, wildfowl and birds. On sunny days there would be crowds of young people and families, picnicking, day fishermen, canoeists and kayakers, even river swimmers. Often there would be a leisure boats too. This stretch of the river has thousands of visits, every year, not just from Saltford but from all over the region and some from abroad. I glimpsed some of this beauty this week (21/10) when the likelihood of flooding, suddenly left just one boat, and the Mallards returned, and a Swan, even the one of the Herons was back. On one day I counted 11 fishermen along the riverside. But no Kingfisher.

What was its beauty

The View, Tranquility and access to the water

Location and opportunity to enjoy riverside setting

one of the only safe places to moor on the river for 14 days

Nothing in particular

Beauty of river and wildlife

Peaceful

A stretch of easy access river bank to enjoy the wild life for locals and visitors

Access along the river

Its easy access from the road,, its quiet waters and pretty views from my boat. I like the fact you get a lot of swimmers there

Peaceful clean and beautiful scenery lots of wild life.

Peaceful surroundings love the nature

The views over to Kelston

Nature on view in a peaceful setting

The peaceful and beautiful scenery

The importance it has to our environment, flora and fauna.

Views of river

I used to like the closeness to the river, which under the current arrangements isn't possible

I love seeing the variety of boats along the river, as well as the view across the river

It is the only safe 14 day mooring on the River Avon; it enables me to travel far enough on the River Avon to avoid having my home seized by CART

Only decent 14 day mooring space on the Avon outside Bath; peaceful location apart from the house residents; safety - there are so few places you can physically moor on the Avon it is a very important safe haven, it would cause a serious safety issue if the moorings were closed, boaters would end up mooring in unsafe places with possible loss of life, they would not avoid the Avon as they are forced to navigate on it due to Canal & River Trust enforcement policies.

Hitherto unspoiled natural habitats for a variety of wildlife and beautiful rural scenery.

The fantastic location and setting

The unique setting, flora and fauna, peacefulness, seeing young and old enjoying everything it has to offer

Quiet scenic area with wildlife

The view and peacefulness

The views, the peace, the greenery and the wildlife. Is one of the only places we have left around to quickly go and detach from the general noise of the normal world.

Being near to nature and the unspoiled views of the countryside

Narrative - Responses

There is no charge

The river and seeing young people boating

The river

Rural river environment

Rural river environment

Pleasant rural river environment

quiet

open and natural views of the river and countryside beyond

the peace and tranquility also the views over the river

The flowing water and views across to Kelston

It is beautiful

Peaceful, access to waterway

River

The spectacular view

Beautiful riverside location

Tranquility and wildlife

Proximity to the river, feeling in touch with the river bank with a good view of the wildlife on the water and in the margins

Wildlife

Its location, enabling me to cover the required distance to satisfy the Canal and River Trust.

Essential stop between bath and Bristol.

Mead Lane a beautiful location, with abundance of wild life and plant life, a peaceful place to relax and watch the non destructive activity on the river such as sailing, swimming, fishing, rowing etc..

the views, peace and tranquility, river and bankside wildlife & flora and fauna

peace and quiet, river and nature

It's beauty. The wildlife. The peace.

Accessibility to countryside, views, walk

lovely views / countryside

The nature and views, it makes a lovely walk on a sunny day

The wild life and serenity and natural beauty

It is so picturesque, interesting and unspoilt

Friendly people, I like the boats / the river

Beautiful views of the river

Friendly people, I like the boats / the river

Pretty riverside location on the way to the pub

Views

Short term mooring

View

It's quiet rural scene and views beyond

Very pretty

The natural beauty and wildlife

The natural beauty and wildlife

The natural beauty and wildlife

Riparian view

Narrative - Responses

The chance to get away from the hustle and bustle, the views, and nature being allowed to live their normal way. When walking being able to stop with no obstruction to take in the wonderful views

The natural scenery and the environment. Away from it all.

its beauty

River walk, nature

Tranquility, scenery, and sailing boats on Sunday

Bird life

River Avon and its wildlife

Good for family walking birds and wildlife

The open country side and view towards Kelston.

Nature

Local and pleasant

Tranquility, and views across river to other bank

The scenic view

Usually Quiet

A very pleasant country walk by the river

It was quiet

Accessibility to lovely location which is perfect for dog walking

Beautiful countryside

The river and nice walks along there

Natural surroundings & Water.

The quiet countryside location with the attraction of many visitors to the area with families to also enjoy the relative peace. i often walk grandchildren in the lane and surrounding areas to enjoy the wildlife.

Tranquility

The river, the views and what there used to be water birds in a what used to be a very peaceful location

The river and views over to Kelston Round Hill. Feeding the ducks with the grandchildren

It's a beautiful spot that provides peace, tranquility and chance to see wildlife.

N/A

Open space

I like how is used to be before it became a transit camp, peaceful, feeding the ducks and watching the kingfishers, but that is sadly no longer possible.

It could provide a amenity for residents of Saltford and other residents to connect with nature, river, flora and fauna. We need these opportunities more and more given the disconnection with nature and the wild in our busy and stressful lives.

The view of the countryside towards Kelston Roundhill.

See wildfowl on the river and surrounding countryside

Views

usually peaceful, quiet and lovely views

the views across the river towards Kelston

Quiet and peaceful countryside

An opportunity to watch wildlife and photograph same, especially scarce insects

it's a calm and quiet place

Narrative - Responses

The river and views seeing people using the water

how close the river is to the road and the view up to Kelston round hill

Tranquil location and scenic views of the country side

It's beautiful, friendly boaters and community

Tranquility

The views

Calmness and the views of wildlife.

It is a beautiful and tranquil setting

peace and quiet

Countryside and riverside views

Peaceful ambience and splendid views

Beautiful scenery

Wildlife

Scenic riverside location

Rural setting and wildlife

You can enjoy a walk or canoe

The river and watching the herons

I love the view in spring,summer,autumn,winter in the sun in the rain it's always beautiful

Its peaceful & scenic

Open location with river side walks

The river

Quiet, the scenery,

Local and near to where I live

Natural landscape of fauna and bird habitat

The river and the peace

Quietness & wildlife

Peaceful and natural.

Beautiful view,peaceful. at one time ducks,swans gliding along the river

surrounding area

the local nature that one sees

It's peaceful naturalness

Being near the river

scenic area and quiet

opportunity in past for peace and beauty

I beautiful place to walk my dog

Amenity for all to enjoy

Beautiful View

Peace and tranquility couple with healthy exercise

Nothing at present

Scenery

The views and wildlife

It is peaceful and tranquil. It has beautiful views of Kelston

overall location and views along the Avon valley

peace and views

Narrative - Responses

The quiet, gentle natural surroundings.

The river and the views

The natural beauty of the fields, hills & river

its quiet scenery

peaceful location

Pleasant vista an unspoiled feeling of tranquility.

It's unspoiled beauty!

It's picturesque and quintessential views and countryside and it's natural habitat

Beautiful scenery and quite waterside tranquility

The beautiful view, mostly friendly neighborhood, nearby parking. In addition it is a key location for me to fulfill my responsibility to move every 14 days while at the same time getting to work

Lovely views, beautiful river, the opportunity to see wildlife.

Scenery

The view and quietness

the view is constantly changing as a result of different weather patterns. At it's best it is a calming refuge from the cares of the world.

Views of the river, wildlife ,landscape across the river

Nature

pleasant rural surroundings and views.

Scenery wildlife

Beautiful scenery

Peaceful, beautiful scenery, wildlife

The distance from local urbanisation. The amazing views and wildlife

Country and wildlife

Seeing the community of canal boats and people enjoying the river through all the different seasons.

I walk my dog along Mead Lane to the sailing club and sit on fine days to look at the wonderful views across to Kelston Round Top and the hills beyond. The view of the river from there is spectacular too in the arly morning and dusk with a variety of wild life to see including the otters that have recently come back to the Mead Lane bankside

It used be a tranquil beauty spot

Lovely views along and across the river

Picturesque by the river

peace and wildlife

It's beauty

Picturesque

A chance to sit in peace and quiet and enjoy the view

over the yrs. quiet outlook,swans&ducks, part of Saltford's riverside beauty, ! .

Tranquility

The River, Views and Wildlife

Quiet rural location

How close you are to the river, the wildlife you can view there.

River and quiet and space

Lovely view

The Nature

Narrative - Responses

beauty, tranquility

The pleasure of the river as a recreational medium, and the associated wildlife, currently under serious threat from the moorings

The water and bird life

Has pleasant views

Peaceful riverside setting

beautiful

Tranquility and wildlife

Access to riverside & wildlife as well as tranquility

nature, views,

Quiet and peaceful location for family walking

access to water and countryside wildlife for children

Picturesque location

Scenery, spotting otters and wildlife. It's a very pleasant walk

Pleasant riverside walk with interesting wildlife

RIVERSIDE , WILDLIFE

It provides a rural/river setting to enjoy a quiet walk

Riverbank and views of Kelston

The view across the river and meadows; opportunity to walk and sit

tranquility,rural setting'

tranquility / natural beauty

Natural beauty and peaceful surroundings

Location and views with the wild life

Views and wildlife

Good access to the river, parking, quiet river away fro the road

The tranquility and the various wildlife

The scenery

Peace and Quiet

its open to the public, for people to use for their given interests

the peace and tranquility of walking beside the river

The wildlife

Fantastic countryside views

tranquility

Wildlife, peaceful fishing

The fishing

The women

tranquility , views of the river and the hills, even saw a deer swim across the river once.

Fine view over the hills

The natural peaceful river loacation

Country side, views, nature

It is quiet and you can enjoy the country and river together

Scenery

area of beautiful countryside

Views of countryside

Narrative - Responses

Quiet and tranquil. Beautiful. The river and wildlife.

views

Beautiful views

Walking, views, natural wildlife

It is beautiful, stunning views, happy memories, as a child and with my children!

Peaceful surroundings

The wonderful view to Kelston Round Top and the peace of the river away from the village roads
open air

NATURAL PICTURESQUE LANDSCAPE

A pleasant walking and socialising area by the river

Peaceful, quiet, beautiful, great views, wildlife on and around river

The natural beauty and tranquility of the area

It is very picturesque

The beautiful river and kingfishers

Peaceful area

It was a beautiful relaxing place to walk through as well as being an important natural resource for
insects, birds and mammals

Beauty spot

It was a beautiful relaxing place to walk through as well as being an important natural resource for
insects, birds and mammals

Peaceful and next to the water

Beautiful area, relaxing for a nights stay

The silence and seeing the wildlife when I walk

River, lovely views

The views, changing river scenes, used to fish there as a lad

Peace, tranquility and nature

Beautiful scenery

Everything

The attractive location and fishing

Riverside location

The view

Nature

The wildlife and tranquility

Lovely views. Beautiful riverbank for walks

It has previously been a peaceful area of Outstanding Natural Beauty where we've spotted
Kingfishers and Herons

PEACEFUL WITH LOVELY VIEWS

Beautiful scenery, escape from the busy city

Restful, wonderful views, wildlife, can walk there from home

a local beauty spot and area for leisure

Views to the hills, water, wildlife

scenery and wildlife

It is a beautiful walk along the river

Peaceful location

Narrative - Responses

Beautiful stretch of river perfect for wildlife and people to enjoy

It used to be a quiet semi-rural lane

Proximity and views

The river and undisturbed views to the Cotswolds

Beautiful riverside location.

the riverbank

The wildlife, walking along and sitting by the riverbank

It's closeness to the River, it's wildlife eg Swans, cormorants, kingfishers, otter (once), ducks and the magnificent view up to Kelston Hill

The river and views opposite are beautiful. Wildlife on the river, I've always loved looking for kingfishers and otters.

The views

Formerly peaceful

The beauty of the river and being able to use it and get the most out of it. The nature and wildlife too is fantastic

Access to fields and river path beyond

Natural beauty

The ability to share a beautiful spot and use it for many different activities

It's a pleasant quiet walk along by the river to see wildlife

Seeing the boats and wildlife

Open feeling and view

It is a beautiful spot, ideal to break up the cruise to Bath

Scenery, wildlife and peace and quiet

Access, beauty, Local pubs, swimming

It's the only good mooring on the Avon

The views

Safe place to moor my boat-home

Peaceful River location.

It's close to public transport for me. For my partner is convenient because he can park the car close. Parking can be a nightmare in certain areas

Unspoiled beauty of the river and surrounding hills

its close to my house

The beauty and tranquility that it used to have

The views

It was a lovely spot for fishing and walking but has been ruined by sometimes 20 boats

Peaceful and fishing

The view across the valley

It's peaceful and picturesque

Picturesque outlook over the river to Kelston Round top, country walks and the wildlife.

Beautiful and unspoilt

It is the only place to moor on the river because inconsiderate boaters over stay constantly on the other moorings of which there are not enough anyway come on CRT and move on when you have been there a couple of weeks give everyone else a chance

The river

Beautiful views

Narrative - Responses

(previously) open river bank all year

Tranquility by the river - observing wildlife.

The views, the river and the character of the boats

It's the only 14 day spot on the river and with two young children this is really helpful

It's the only viable two week mooring cursing between bath and bristol

The beautiful views, the flora and fauna.

The view of the hill. I love looking at all the different boats and the life they represent.

Was once a peaceful place to enjoy fishing

It's alongside the river

A user friendly mooring spot for boaters who must use the river to satisfy their cruising requirements

The clear view of the river and fields to Kelston Round Hill

Nice area to have a picnic on the water bank, clean tidy location

The picturesque views and wildlife

The quiet natural environment

Attractive scenery

What was a quiet peaceful rural environment

The views and that is flat and easy for me to walk

The beautiful views over the AONB. Used to love seeing and hearing the wildlife

Fantastic view towards kelston

Its beauty and serenity

it is a beautiful river bank location

THE QUIETNESS AND THE FISHING

Peace and quiet being by water

Peace and quiet

Peace and quiet

Peace and quiet

It's a local calm beauty spot

The peace

Fishing the River

Wildlife and landscape.

The unspoilt view and the wildlife.

The view and tranquility

pleasant countryside, the pub

The views and tranquillity

It's rural setting and the view towards the Lansdown hills

The River views and views towards Kelston Roundhill

The natural location. This is one of the few areas I am able to fish without being a member of an angling club. This allows children to be introduced to fishing without having to join a club. This is a valuable facility provided by the council. I have fished this area for many years. This fishing can be outstanding. Whilst fishing or picnicking I often see many species of birds including beautiful kingfishers. I often see many species of dragonflies.

We used to like stopping there, as the children enjoyed sitting on the bank watching the boats.

The picturesque views of colourful boats on the river, rolling feilds & hills and the Jolly Sailor.

Narrative - Responses

Quiet and scenic

Nature

Looking at the canal boats and scenery

Peaceful spot by the river with the fields and hills in the background

a place to stop the boat

Pleasant

Beautiful

One of the very few safe moorings on the river.

Loved the area

It's one of the very few places on the River Avon where you can moor for 14 days and don't have to basically climb trees to get the boat tied up, not at all easy at my age

Eaze

Easy access to water

Its outstanding beauty & river accessibility

Tranquility and Scenic Views

Tranquility and scenic views

The wildlife

pRETTY

The countryside

I like to visit and sit and enjoy the peace and quiet. It was great as I have mobility issues and I could get near the river without walking far. It's beautiful there.

The view

It's natural beauty, cleanliness and peacefulness.

quiet and peaceful, easy access to river, parking

Don't like it

Pleasant views and nature.

Beautiful views, One of the only easy spots to moor with our children on this part of the river.

The scenery

That it is quiet.

Open space

quiet

safe ,good access for fishing

Beautiful and only mooring on the river

It's a beautiful stretch of river and I can see the hill where I scattered my mother's ashes.

Peacefulness

rural aspects, secure mooring

It was a great place to stop during a cycle ride.

It feels safe and quiet.

Peaceful

The natural scenery, the colourful boats moored along the river and the open fields.

The nature

Natural beauty

The relaxed and natural environment. the lovely boats on the river. the view of open fields

Natural beauty

Narrative - Responses

The (usual) tranquility and peacefulness of the river

It's green and a great place for all people to enjoy

Great pubs

Access to water.

Integration between moorers and holidaymakers/visitors/residents

QUIET RIVER AND COUNTYSIDE VIEWS

Friends

Great for swimming, fantastic views

It has beautiful views, it's one of the few places you can moor on the river, it's one of the few places you can get your car near your boat

Flora and fauna

The natural beauty of the landscape, wildlife and the friendly boaters

It should be unspoiled

Calm and beautiful spot

The countryside

It is a wonderful place to be able to Moor - it is beautiful and access is not too difficult.

Connection to nature

It's a secret area that has a history. Lovely place to hang out on a sunny day.

The boat community

it's just a mooring spot, nothing special.

Green open space. Pub nearby

The tranquility

That it is quiet.

Green and beautiful

Inhabited landscape blending into open countryside, opportunities for walks, wildlife

The tranquility and quiet. Picturesque and unspoiled

access. the view. safety

Nature diversity of people

It is a beautiful and convenient spot

The canal and seeing the boats in such a beautiful setting.

It's a beautiful spot and easy to access the river

Views

It's a beautiful spot to visit and just off the cycle path.

Countryside. Local facilities (Jolly Sailor)

Beautiful countryside interesting

Perfect short term mooring spot, only stopped for one night every time, used local pubs/shops, walked & cycled

Pleasant apart from a few troublemakers

Beautiful view safe mooring close access to road

Accessibility and Beauty

Friendly people, beautiful scenery, lovely boats

Its tranquility and beauty

Nice walk to pub alongside river, dog walks

The natural beauty

Narrative - Responses

The beauty of the surroundings

Beautiful scenery

Views of the river and the round hill, quiet beauty

Stunning views, quiet.

it's a spot between bath and bristol and it's pretty

Great views

Scenery, including the boats.

Location and space

Beautiful setting

Everything nature and the boats

Peace and quiet and wildlife

The safe river mooring

Peaceful, quiet mooring.

The views, the peace, the countryside, the animals, some of the lovely people and their boats that are moored legally.

the safe mooring, beautiful area, really lovely for children

It's a safe place to moor

the boating community feeling, is a very warm place

Riverside walk, seeing a living river, with boats wildlife, the river being used

Beautiful location, great pubs, canal boats

I love how many different people can access and enjoy the water and the surrounding natural beauty

Mead lane is a beautiful location, and a excellent swimming spot and it is easy to Moore and board my boat which is important as I have a baby.

Safe mooring

Scenic, open views. 2 good pubs, cycle track.

Beautiful locationO

Its a calm beautiful location, that should allow inclusivity to the residents of canal boats. Housing is a problem in the city of Bristol, and canal boats offer an alternative low impact way of living that should not be curtailed

The views and the peaceful location

Its really pretty, and there's often freindly people there

Central and very few moorings for us so this is imperative for us 😊

Being so close to the river

Watching the Boat's

a very convenient and much needed pit stop between Bristol and Bath

Love the scenery, swans one other wildlife and tranquility of the general area

Safe place to stop on the River

Nature, community, alternative life style and opportunity for quieter living

The tranquility and nature.

liked it before it became a travellers transit site but now location is spoilt!

Views and peaceful location

Beautiful location, good bus service to Bath

It's one of the rare places to moor on the river. There's hardly anywhere to Moore. Most of it seems to be rented out to Bathampton Angkesa Association

Narrative - Responses

Quieness, peace and the wild life

Feels like natural undeveloped location

The scenery. Safe mooring conditions. Road accessible mooring.

Countryside

Its a lovely location, enjoyed by many different river users

History of the working of the river

THE FACT IT WAS ONCE A NICE PLACE TO DRIVE / WALK / LIVE

Easy to meet my friends who live on boats

Easily accessible

Relaxing spot

the view opposite of kelston round hill. close to two good pubs and shops. usually moor there and walk across to the crown and then up the hill and visit the bath cheese place.

Close pubs, views and great moorings on the river

Beautiful spot, convenient location for mooring - without it there are very limited temporary moorings between Bath and Bristol

quiet, pleasant views,

It is within walking distance and offers public access to an AONB

Good bank. Lovely area. Nice views.

Beautiful location

Beautiful countryside, easily accessible by car, bike or boat!

Atmosphere, views, pub, the value of mooring as there is a lack of mooring in the area.

It's a beautiful location, I love seeing the busy river and enjoy meeting boaters & their traditional way of life- we often share a cup of tea and go onboard

Fantastic view and river

Wildlife

The safety of being able to get my child on and off the boat

The beauty of the river

Tranquility

The views, the peace and quiet of the river bank (when there are no boats as in winter) and the wild life on the water and banks. This is a rare spot in the Green Belt where there is easy access to the river bank Before the boats took over it was nice to see families picnic on the banks and it was also a popular fishing spot.

Great space for bats

It's outlook - river across to beautiful countryside and up to Lansdown and the roundhill

beauty of the river and countryside

The tranquility, the wildlife, and access to the river bank plus the formerly uninterrupted views across the river towards the Cotswolds AONB

It's closeness to the river so my grandchildren can feed ducks and enjoy the wildlife

Riverbank and lovely views across to Kelston Round Hill

Visual beauty of the area

It has been a beautiful walk along the river and there used to be all sorts of wildlife on display.

Views of kelston, access to countryside,

Views and relative tranquillity

Location, I have limited mobility and was able to enjoy a few hours fishing but since the boats have taken over all of that has gone. There should be no mooring at all.

Narrative - Responses

Quiet, Peaceful and allows good access for fishing.

Accessibility to community. A lot of the river moorings are remote and it's lovely to be able to be around people and park close to my boat for a couple of weeks.

Open to all

The nature and the boat people

Peaceful riverside

Quiet

Very pretty, nice mooring spot

The natural beauty, wildlife views and tranquility

How beautiful the location is and the wildlife that lives there.

The countryside

Natural tranquility and riverside views., watersports

Tranquil river location with really outstanding views of the Cotswold AONB and somewhere to view the River Avon's wildlife in its natural environment – but only in the winter months now. Great for landscape photography. An important part of Saltford's almost unique natural heritage and a major reason why many residents and visitors like and appreciate Saltford as a rural village close to Bath and Bristol.

It has always been an accessible and especially beautiful stretch of the river, featuring way back into the time when Avon publicity materials presented as one of the county's principle beauty spots.

A peaceful river's edge with stunning and iconic views of the Cotswold AONB countryside enjoyed by many generations of residents and visitors. Ideal for relaxation away from the hectic demands of everyday life that enables villagers, visitors from towns and cities and their families to appreciate nature and the North East Somerset countryside at its best. A jewel in Saltford's crown. Ducks and Mute Swans no longer nest on Mead Lane's riverbank (due to moored boats) which was previously something for young families to observe and enjoy along with the opportunity to observe otters, Kingfishers and many other species of wildlife.

Unspoiled beauty of the river and surrounding hills

It is a good location for older infirm anglers.

The views.

Views.

I like the nature and wildlife that live there. In the summer it's lovely for visitors to enjoy and picnic

It is a beautiful and peaceful area of the river bank and allows views across the local area which are unavailable elsewhere. It is a great asset to local people and the environment.

The view.

the fact there is safe access on/ off the boat for my children (unlike other river locations)

Peaceful and beautiful a convenient stop while cruising the Avon

A very pleasant mooring spot on a river with few places to stop

Peaceful natural space

Environment and beautiful views

The views when the driver is clear and watching the sailing boats.

The beauty of people and nature

It's the only 14 day mooring on the Avon that's near a road

River

Just the stunning location

Availability

Narrative - Responses

It isn't a relatively safe place to moor when the river is in flood.

It is one of only a limited amount of moorings on the journey to Bath and if not available would cause a real problem to move a boat between Bristol and Bath where so few moorings are available.

The view and the boats

Chance to moor there

Lovely part of the river Avon & we like to visit the local pubs.

The tranquility (see next comment).

n

seeing the views and wildlife

It's a beautiful aspect, it's peaceful and a rare mooring on the River Avon

As a continuous cruiser it gives me a safe mooring on the river while I am in the area.

Beautiful views and peaceful

This mooring is a special place that offers a beautiful recreational space for all - boaters and locals alike. It is a very important mooring location in the stretch of the River Avon between Bath & Bristol, which is already very sparse for moorings.

The environment

Pretty location, everyone seems friendly

You can moor there which for that stretch of river is rare

Good place to fish

It is a very nice restful area.

Tranquility

It used to be a great place to sail

The boats

The AONB opposite and the space on the river (that we used to experience for sailing)

Beautiful setting with easy access to cycle path

Nice country walk

Scenery

Beautiful location

Its so beautiful

Very peaceful

Pretty

It's a beautiful mooring and a very rare mooring on the River Avon.

Scenery, wildlife, being by the water

Otters

Views and river

Riverside walks and views

Beautiful views and landscape

Nature and wildlife

Outstanding nature and wildlife

Walking

The river

It's peaceful, beautiful and a lovely place to visit, plus easy access when I take my mum who has mobility problems

Narrative - Responses

Quiet peaceful unspoilt location with uninterrupted views of river and surrounding countryside. I worry that if perminate moorings are allowed that this unsoilt area will change for ever. I remember walking out along the canal in Bath to the pub at Bathampton years ago when the only disturbance to the peace was the occasional barge boat sailing past. Nowadays this towpath has moarings all along the waters edge with debris from the boats either side of the path.

Stunning location

View of Kelston, the river environment

Keep the status quo

Peace, wildlife

Views

It's beautiful! We can moor close to the bank.

Peaceful beautiful river

Riverside setting

View

Friendly boaters who will always help you out

Peaceful

Beauty

Wildlife

Tranquil [mostly] river setting; wildlife, and beautiful views. Also flora on Kelston side of river
outstanding beauty and nature

Delightful riverbank, splendid views of Kelston Hill

The wide view, the water and the riverbank.

Nothing it is a terrible ill thought out option for moorings with no supporting infrastructre

Lovely peaceful part of the river. One of the few available moorings when cruising

Its peacefulness and riverside sneery across to Kelston Hill

Its riverside location

The splendid views across the river

wonderful environment

wonderful environment

Good environment until the boats arrived

It is a beautiful part of our village.

The baots

It's a decent mooring

There aren't many other places to moor on the river. I like Saltford.

It's natural beauty

The river & wildlife

Beauty, convenience

The peace and beauty of the uninterrupted views and wildlife.

public use of the river

Countryside views, river, and being so close to home

Easy access to the river

The beautiful view

It was peaceful and scenic

The beautiful view

Narrative - Responses

Accessibility, peace, outstanding view

Peace and quiet and prettyness

Enjoying the hitherto 'unspoilt' natural beauty of the location, particularly against the backdrop of the Cotswold Hills.

Views and the tranquillity of the location

One of the few non marina moorings on the Avon

It's beautiful and it's great to see people using the river

Peace and quiet

It is a beautiful scenic location. Furthermore the bank is low risk for mooring (not rocky etc.)

it's a lovely open stretch of canal/countryside view

Very pretty

River Avon is a lovely River and Mead Lane is a good bit

Peace, nature, road access for dropping heavy items from car

Low numbers of vehicle, access to cycle path, great views

Wildlife

Tourism, walking, swimming

Access to cycle path. Ease for loading supplies to my boat in prep for winter

The river, peace & tranquillity

Environment

The river

The relaxing atmosphere

The green community space and the boat community

The rural outlook which hasn't changed until now

Outstanding beauty. Look out to countryside.

Views, safety

The open aspect across the river to the fields and beyond

Beautiful river bank location

The view is beautiful and the Bristol to Bath Railway Path is easily accessible. I have seen an otter this summer as well, which was a great moment.

The open countryside and being beside the river

The unspoilt countryside

peaceful location

the view of the river, its fauna and environment

Scenery, wildlife, access to river

Quite a good launch point for Kayaks

Peacefulness.

I is a good location for older infirm anglers.

I don't like it, but it's the only safe mooring on the Avon where you can moor for 14 days.

Potential access to nature and wildlife

The wonderful riverside views and wildlife

It's one of the few moorings close to bristol

Scenery, open spaces

The nature, beauty & tranquillity of the area

Being on the water and the beautiful views to Kelston, the peace and quiet.

Narrative - Responses

Nature and the residential narrow boats who are looking after the area

River, countryside views, wildlife, peace.

Nice river mooring

Being near the river, seeing the wildlife on the river, looking across the fields opposite

Views of the unspoilt countryside

Peacefulness

The outstanding beauty, peacefulness and wildlife.

Countryside, nature, community access and leisure opportunities

The view. The cleanliness of the river

Beautiful scenery & views

It's open beauty

Views & Peaceful nature of location

It's open, peaceful lots of wildlife available for river users to use.

The Nature

It is a beautiful spot and it is nice for swimming and canoeing. Some of the very friendly residents.

The view and the local walks

Lovely location to walk

Its quiet location and stunning scenery and views

view / countryside

Calm and pleasant riverside location for a wide range of leisure users and wildlife

The view from the river to the hills beyond

peaceful location, good pub, access to cycle path

It's beauty, easy/safe mooring for my family

natural beauty and wildlife

The beautiful location. The river, the wildlife

Views and river access

an area once known for its tranquillity and focus on a natural environment with a harmony between people and nature. A place to stroll in the evening and to start a wonderful walk along the river footpath and out into the Saltford country side using the foot pathshse

A pleasant place to stop for lunch or for the night, bearing in mind such places are few and far between on this river

Peace and quiet

rural

Quiet countryside

It's a peaceful calm place to take a walk and enjoy the beauty of the area with fab views across to the Cotswolds

It's beautiful

Good pub. Access to the cycle path.

Beautiful views across the water

The peace and quiet and tranquility, the views and unspoilt rural area

I had my baby there in 2015

The absolutely stunning landscape that the surrounding hills provide, and the river as both a natural haven of tranquility and the boating community of which I am a part of.

Scenery tranquility

Nature and open space

Narrative - Responses

Variety and colour

It is one of the few safe, non-isolated (for a lone woman) and accessible places to moor on the river

Its proximity to the cycle track for commuting

Quiet location, wildlife and sailing club

It's quiet and pretty, it's close to the cycle path to commute to work and there is a place to park the car.

Tranquility

It's a beautiful and convenient place to moor

It's a lovely place to be

Natural beauty

Access to countryside

Peaceful, wildlife

An opportunity to watch wildlife and photograph same, especially rare insects such as the Scarce Chaser dragonfly which breeds along the riverbank. Kingfishers and Sand Martins also breed in the area.

It's attractive

Seeing the boats

Ease of access, safe spot on the river to moor, close to local amenities including doctors

It's beauty

The river frontage, boats and other users of the river

Quiet location

A reasonable mooring facility.

It's beautiful

Being able to moor

Being able to moor up and enjoy the location

The river

The beauty of the river and countryside

Easy access to transport

The stunning scenery and quiet spot for dog walking

It is a stunning location

The views, wildlife, walking and all on our doorstep.

It's close to the village & main road but feel like you are in the countryside! Peaceful. Calm. Tranquil.

Close to road. Easy access to water

Local countryside

The boats and the wildlife

Attractive countryside

I don't like anything about the Mead Lane moorings

It was a short trip from the marina.

Quiet

Lovely views

Was lovely

I have to go down the river to comply with distance i need to travel to get my license. Mead lane is a safe temporary place to moor on the river with my young children if it is taken away i would be

Narrative - Responses

risking their safety by trying to find wild moorings. I don't think anyone wants to put children lives at risk in this blatant greenwash attempt

The tranquility and the wildlife

the view and the boats

It was the peace and quiet with the views where you could go to fish

It's beauty, it's community vibe, pretty boats that home friendly canal families, pub near by, idea it is a common space for lots of different people

Accessibility

its rural tranquility

it has easy access to cars, and is a beautiful location and \ great place to swim, both Pubs do lovely food and are very friendly ,

the quietness and nature

Community, views

The views and wildlife

This is a stupid question

It is one of the few places to stop overnight between Bath and Bristol on the river, it has great views and local facilities.

Walking in a natural beauty location

It is one of teh fw K&A mmoorings that allow a narrowboat to get alongsode without use of the plank.

Peace and tranquility

Nice place that adds to the number of available moorings

The overall character of village and boating communities

Views and wildlife

The water

A lovely peaceful local amenity

West end of K&A

open air

beautiful environment; nature in and on the river

Peaceful beautiful rare river mooring.

peaceful

Peaceful back to nature feel between two big citiea

Riverside location overlooking the Cotswold AONB and the opportunity to observe wildlife with a relatively unspoilt countryside setting. A beauty spot where individuals and families alike can enjoy a peaceful riverside experience in stunning surroundings.

the scenary

Its beautiful

Countryside and convenience - moorings are not plentiful in the area.

open views

Remoteness

Natural beauty

nice place to stop overnight

The scenery

Somewhere to legally moor. Nice views and easy access to road. Sewhere

The access it gives to an AONB and the opportunity to enjoy the river and riverbank.

Narrative - Responses

near saltford

Close proximity to the town

Wildlife, tranquility

The peace that is there, and the beauty of the river, fields and hill ridge.

Access

Wildlife.

It's beauty

It was a very tranquil part of Saltford,very enjoyable walk

Peaceful location

Access to the boat and admiring the views and the wild life

Scenically delightful

The view over the fields opposite

Tranquility

The country side, fresh air. The view.

Tranquillity, scenery

It's serenity

The countryside location, local wildlife etc.

Peaceful spot with plenty of wild life

Tranquility and views

Look at life on the water

Picturesque veivs

nice walking location

Wonderful views, herons, watersports etc. on the river

The wildlife and trees.

Close to the cycle path/ bus route. affordable mooring.

Beautiful scenery. Access to a lovely area

Views of Kelston Round Hill, the variety of boats moored along the riverbank

a good area for nature and wildlife to thrive

Nature, the river, the views.

The views

It's a beautiful location, and provides much needed moorings on the Avon

Waterside community in a tranquill setting

Lovely location or was

The peace and quiet, the beauty and the wildlife

Open aspect. Views.

access

Peace and quiet. The mooring. They are rare on this river

Outstanding natural beauty

Somewhere to moor for a couple of days.

Peaceful natural wildlife habitat and birws

The beauty of the river and the landscape

Quiet, beautiful and wild life

Quiet

It is beautiful countryside an attractive part of the village

Narrative - Responses

It's beauty

The beauty of the location

The view

Views and boats

View of Kelston.

The colourful variety of boats

View across river, quiet location (as was)

Unspoilt natural beauty

The view of kelston, and seeing the river being enjoyed

It was a beautiful place to live before the boaters turned up

accessibility

Easy parking for fishing

the views

The open view across to Kelston round hill

Lots of boats, beautiful river, safe as its populated, the view, the river

The beautiful views and wildlife.

It used to have plenty of wildlife, not now the boats are there.

Beautiful views and previously uncluttered river bank

Lovely scenery. Convenient for brief stop on the way to and from Bristol

Peaceful

Beautiful area

Picturesque

It's convenient on a long trip back to the canal

It is peaceful and there was plenty of wildlife

Peace and quiet and beautiful scenery

Beautiful views and feeding the water birds

Lovely location

It's beautiful and peaceful

Beautiful surroundings, quiet people

The beauty

It was peaceful and quiet along the river

Views

Views, peace and quiet

Quiet, views, wildlife

It's a nice mix of locals and boaters. Beautiful spot

The views

Peacefulness

Walking either side of the river

Scenery

The Wildlife and views to Kelston

Great walk

The peace and quiet that is no longer 😞

Beautiful location

Idyllic rural scenery

Narrative - Responses

Gorgeous views and peace and quiet

Nature, the characterful boats and range of activities people do there

The view

pretty area

The Tranquility and it's so picturesque

Pretty location, views and wildlife

Wildlife

Nature, peace and beauty of natural surroundings

It's peaceful, tidy and the views of the countryside

Used to be quiet and beautiful place to walk

It's beauty. Fishing. Watching wildlife

Beauty of the area.

It used to be quiet, peaceful and tranquil

It's a peaceful location with good access by road and the cycle path

There are always interesting boat community members passing through. Oh and the sunrise view.

It's beautiful

Beautiful views and calmness.

The view

It's a beautiful spot that lots of people enjoy

The countryside and beauty of the river and river wildlife

Convenience

The river, wildlife and views

Views and water

A nice setting

The views and the peace

Scenery peace

View

The scenery and openness of the fields opposite the river

It provides essential access to enable continuous cruisers to complete their minimum distance. It is the only 14 day mooring available on the river Avon and is essential to preserve the way of life

It's a pretty and aslo very relaxing location, it boosts my mental health

The beautiful scenery, river and Kelston

Access and rural environment

The Wildlife

The narrowboats ability to moor

The views and the wildlife

the river, swimming in the river, the peace, the views.

Safe, quiet location

Stunning views

The view from my duck hatch

Attractive and interesting place to walk

Easy acces to sitting on rivr bank, watching all activities on water

It's a beautiful place to moor there and as I Seidel earlier it's one of a few SAFE places to moor on the river with a baby on board.

Narrative - Responses

Quite area relaxing

The mix of things one can do there and the closeness to local pubs and public transport. Lovely place to moor our boat but also visit there even without boat.

Peaceful and picturesque

Location, access to Jolly Sailor

River and its wild life

Natural beauty and wildlife

Beautiful view handy for local facilities

The river wildlife

Scenery

The river

lovely spot

Picturesque setting. Friendly locals (both boaters and residents)

Stunning surroundings, close to cycle track

Its general environment

beautiful

Lovely location

Scenery and ease of getting to and from car

The views

Convenient sailing location.

Its peaceful

idyllic views

fishing

Halfway between Bath and Bristol. A vital mooring.

The boats, community, wildlife

One of the few mooring places on the river with vehicle access.

It's beautiful and the pubs are lovely

Ease of road access & river view

Beautiful

A rare mooring opportunity on the Avon

Very peaceful

Open countryside / river and the overall ambiance

Access to nature

It is very pretty and a safe harbour where there a very few moorings

Beautiful location, nice pubs and good access to our car when we are moored there

Pretty

River and views

bikable pace where you can sit by the river and relax

Picturesque location, the river, water sports and history of the area

It's a beautiful place in a good location

the natural beauty and views

Beautiful location.

Stunning scenery

The view and the tranquility of the lane and the wildlife

Narrative - Responses

Easy access

The mixed use of narrow boats cyclists wildlife always feels calm

Peace and high quality environment

Open Access to a small stretch of open water, used for fishing, sailing, canoeing and other sports

Peace and the views

Lovely rural location.nice man from bains collecting rubbish

quiet, pleasant views,

The views

Scenic

Beautiful views, lovely countryside, wildlife haven, community atmosphere

It is just a delightful spot

The view and it's safe

The natural beauty of the area including the nature and wildlife of the river and surrounding areas.

It's beautiful, it's on my cruising route, I can swim in the river there, the pub is nice, the fields are great to walk the dog in, it great for access as the car can be close and necessary things can be achieved like taking laundry/loading with wood to keep warm/carrying gas bottles to the boat to cook with.

Openness to the country side

Convenience and local facilities

so beautiful

The view

The view of Kelston round hill. The wildlife. The moored boats. The sailing boats.

Quiet

Beautiful views and quiet location

The beauty, the community

Beautiful views. One of the few places on the Avon to moor

It's location

its calm and pretty

Boats

Its a very beautiful spot,i enjoy mooring up for a weekend while on trips to bath.i also enjoy fishing from the safe and comfortable banks.

It's a beautiful spot. There's a couple of good pubs, and good road access. But mostly I moor there because it's the only place to moor between my permanent mooring and bath. It's too far to travel to bath in one day.

It's such a beautiful location. Handy pubs and always nice to see (and chat) with different boats and boaters there.

The view of the river with all it's wildlife

Until recently Mead lane provided a quiet road and stretch of river which was open to everyone to enjoy be it sailing, boarding, fishing, rowing or simply sitting.

River View. Wildlife sighting (diminished)

The beautiful riverside and views

Beautiful scenery and peaceful for walking my dog

The view is stunning

Views

Narrative - Responses

the view of the Cotswolds AONB is amazing, the access to the river and spots to sit and picnic with my family (before the mooring trial was initiated) and the wildlife...

The openness and views across to Kelston

open countryside

APPENDIX 8 – Q8 – What do you like least about the Mead Lane location

Narrative - Responses

The congestion and mess

Unable to see the River and Wildlife

The unsightly outlook of what was once a beautiful peaceful place, spoilt by some makeshift boats that appear to be unriver worthy! And the rubbish strewn upon the riverbank spoiling a beautiful place.

now not able to fish

The inconsiderate boaters and people living in vans!

Pollution

The tension between residents & boaters since the mooring trial began.

The boats which moor up along the riverbank are scruffy and unkempt. They ruin the appearance of the local area. Some of the occupants of the boats can be intimidating, sat out during the summer drinking and making comments as you walk past. This past summer there was an obvious pungent smell of 'weed'. It's no longer a pleasant environment to walk with your family and I certainly wouldn't feel comfortable doing so at night. The boats double moor and they have no regard for the wildlife as demonstrated by them mooring over the otter sign at the end of Mead Lane. In terms of hygiene, for those that were moored two weeks plus during the summer without moving, where was their waste going??

Occasional aggravation from some local residents when moored there.

The current situation with live aboard boaters and van dwellers have monopoly of river and road, ruining area for residents and others

Any litter or damage

Solid Moorings blocking riverine views

It can be busy with quite a bit of traffic on the lane although we always either walk down or use a bike. The recent appearance of sundry boats has not helped.

Increase in rubbish, noisy anti social behaviour from boaters

parking on the verge, nose to tail moorings

Dogs

When all the quiet activities enjoyed over the years are threatened in any way

Nothing

Pedestrian safety -lack of lighting and pavement

Too many boats mooring there. The destruction of the riverbank

No access to river these days along quite a stretch as boats seem to be permanently moored there. We used to feed the ducks and see swans, haven't seen any along there for some time

Rubbish adjacent to moored boats

The canal boats lining up along the edge , even 2side to side .r

vehicles, parked or speeding by

The cars driving too fast with small children around

debris and rubbish accumulated around boats

The permanent house boat moorings alongside the road and the obstruction these cause.

TRAFFIC

Lots of cars parked along by river makes it difficult and dangerous for children to pass safely

Narrative - Responses

It can look a bit messy, with cars parked along the river's edge

It has become messy (the banks) and at times very congested.

The thought of more boats

Parking of cars

The lack of access to the river caused by the moored boats. The boats are often moored bow to stern which prevents access to the river. There are often boats 'rafted' two or three deep on the moorings so the river can hardly be seen let alone accessed.

Animosity

This is one of the regions beauty spots, the two pictures on Banes website show how picturesque the Salford riverside is, without mooring boats Sadly in the last three years the riverbank has become at terrible mess, damage to the plant life along the banks, posts removed, trees used for mooring, parking on the banks. the road and riverbanks used as place of work, visitors encouraged to stay overnight in vans and campervans, dogs not on lead and wandering into the road and defecating on the river bank. Three times in one morning one dog was in the road, when asked the owner to put the dog on a lead for the dogs safety, was told to "f### off." I saw someone using arc welding without screens whilst pedestrians including children walking past just metres away. One boat owner thought it was fine to have his car on precariously propped up on bricks all day. There is no footpath along the Lane and when there is traffic, pedestrians are forced to walk along the river side of the road often adjacent to boats and associated Health and Safety issues or indiscreet behaviour and language. Living at the northern end of Mead Lane, I consider myself extremely fortunate that I do not live alongside the river, which has become a travellers camp marina, which Banes Council has created without any planning, facilities, monitoring, and without full consultation with residents, interested parties and organisations. The previous Banes Council undertook this "boating trial", to perhaps "pacify live aboard boaters, cleared from near Poultney Bridge and the site of the new Bath Quays". Now that the building works have been finished perhaps Banes might move them back to that area, if they feel they have a responsibility to them. I am certain that many of these people are responsible and not likely cause damage and anti-social behaviour. Sadly, from the evidence seen here, there seems to be an element who are unsuitable.

The damage that has been done by the very poor management and enforcement by BANES of the trial and the usage by boaters of this stretch of Mead Lane. This is damage to the nature, environment, riverbank, the local community and visitors to Mead Lane. Also highly important and again through the lack of management and enforcement by BANES are the many Health and Safety hazard created by some of the boaters. These are hazards to all the users of the Lane. I understand that the riverbank was repaired to prevent erosion of the river bank to protect from collapse the roadway of Mead Lane and I am therefore concerned that use of the river bank for mooring could increase damage to the river bank. I fully support both Salford Parish Council's and The Salford Environment Group's policy on the mooring trial and the future use of Mead Lane.

Moored boats blocking all the above

Unauthorised moorings and resulting litter and debris

attitude of local residents in the houses

Nothing in particular

Traffic and too many boats

The present situation

All the boats moored up

No bins service at all and no water point.. local residents can be very abusive and demeaning.

Cluttered, ropes all over bank, dogs off leads junk, noise and smoke from generators ruined river bank and verges.

Too many boats and mess

Narrative - Responses

Cars - parked cars

Traffic, long term visitor parking and the current mooring situation

Parking

The propensity for it to be damaged at a time when we're already fighting hard to preserve our environment.

Current situation with live aboard boats and overnight sleeping in vans outside our house

The parked cars making it almost impossible to walk safely along Avon Lane

Some of the ugly houses

If it was not for CART enforcement I would not navigate on the Avon at all because of the harassment of boaters by local residents in Mead Lane, taking photos, noting boat names and numbers, being abusive and trying to manufacture accusations that boaters leave rubbish etc when these are deliberately left by the residents to discredit the boaters

hostility of local house residents, parking difficulties

Mooring infringement, the eyesore caused by boats in inappropriate condition, antisocial behaviour of those whose boats they are and damage caused to the environment.

The lack of policing for 48 mooring

The loss of the serenity of the area, the amount of vehicles that are now parking along the river and further up the road making access even more difficult, the increased effluent into the water and on the banks especially as this is a health hazard for the young people who enjoy their watersports, the reduction of the fisherman along the river banks, the mess along the verges created by some of the boating community

Parked cars

How busy it can get with cars in the hot weather, but is good revenue for the locals.

The racing cars to and from the pub and the litter created by those staying along the river banks

Nothing

The traffic and riverbank being destroyed

How busy it is becoming

Rubbish left on bank site by boaters

Rubbish left by boaters on riverside

Rubbish left by boats

moored up and cluttered up boats and river banks etc

moored boats

the odd ignorant driver that comes along

Seeing all lived in boats moored up

Driving down the roads leading to it

Access difficult on occasions

Bust traffic at times

There's nothing not to like

Some scruffy public and private areas

Moored boats, often with generators/engines running, and generally untidy

The moorings, clutter & domestic paraphernalia which obscures the view and access to the water's edge and the bank

Houseboat mess

The uncertainty surrounding its current mooring status.

Too many moored boats, causing pollution, damage to public and private property, almost 44% now overstay stated mooring times, many boat owners use the lane as a workshop to repair their boat, or weld/repair their vehicles as the public walk by and without regard to safety of others,

Narrative - Responses

use the river bank as their toilet, abuse residents, some even drag smaller cruising boats out directly over the river bank without regard for the damage they cause the structure of the bank. the increase in boats tying up along the riverbank , including tying around trees as well as bikes .chairs and other items on the bankside and the trampling down of the area !

disapproving residents

Rubbish. Too much on road parking.

Occasionally feels unsafe when walk with the traffic

mooring of untidy boats

Traffic - too many of both cars and pedestrians

The old vans and old boats and extra rubbish

The rubbish and rickety old boats that have accumulated

only one bench if you want to sit and take in the view

Traffic / stuck residents in posh houses who think they own the river

Traffic

Excessive numbers of less than attractive boats

Can't ever get in as people outstay there time. No effective policing

Traffic and poor public house

Too many boats mooring and car parking on verge

Rubbish present from the moorings

Rubbish present from the moorings

the tattier boats

The possibility that what has been for as long as I have lived in "Saltford" 41 years, a peaceful place could change and become congested.

Currently too many moored boats, the traffic and difficulty with access to the area.

residents complaining unnecessarily

Scruffy boats, cars and vans parked carelessly on grass verge, and rubbish / debris/ pollution from above.

Boats mooring

Moored boats and barges

Boat moorings and poor road surface

The untidy boats mooring on the river bank. They are an eye sore.

Nothing

Rubbish

vans/cars parked up, occasionally rubbish strewn,

The obstruction of the river-bank with moorings

Boats mooring casually

Traffic

Boats

Eyesore of moorings

The narrow boats

nothing I do not like about it.

Shabby & decrepid boats moored along the roadside and debris dumped on the riverbank by the boat owners

The result of the over mooring of houseboats which are moored nose to tail during the spring and summer months some moving on regularly only to be replaced as they swap positions denying access for other river users such as family picknickers, fisher people, canoeists, artists and others.

Narrative - Responses

The associated parking of the boat dwellers vehicles and live aboard vehicles of various types in the lane causing congestion and forcing visitors including disabled to park elsewhere families with children and walkers to walk in the narrow roadway with its obvious dangers. Pollution caused by the overuse of the river/riverbank as a permanent boat dwellers location including; NOISE The regular running of boat engines and/or generators to recharge batteries for hours on end (its like the constant drone of having a large truck outside the house running its engine for hours on end). The use of electric tools to complete repairs and refits of boats and/or vehicles such as electric saws, drills, grinders and welders for excessive periods (THIS IS NOT A BOATYARD). Late night parties on boats with music together with early morning disturbances, (I have witnessed drunken brawling as early as 7am with drunks sleeping it off on the bank during the day!). WATER Leakage of fuel oil into the river and general discharge of "waste" water. AIR As a result of the long running engines as mentioned the air fills with diesel fumes which hang around the valley, so much so that you not only smell it but at times can taste it in the air. with tyge house windows open it gets into the house and lingers. We worry about air quality around roads but appear to take no account of the air/fumes coming from boats and affecting the dwellings and people using the river/riverbank. RIVERBANK Disturbance and damage to the plant and animal life along this stretch of water, the obvious signs include the reduction in the appearance of waterfowl (Ducks, swans, moorhens, herons who now rarely now nest or visit the area. I'm told that the affect on the invertebrates is catastrophic! Instances of Boat/VAN dwellers using the Riverbank (and domestic gardens) as toilet facilities. It is now winter and most of the boats have moved on as the river flooding season is here except we now have; One large boat moored while being refitted (THIS IS NOT A BOATYARD) One used regularly as a "Rental" boat moored/stored with no one in attendance. One which was towed here so I assume has no operational engine or power just "dumped and One narrow boat stored and unattended most tied to trees which is likely to cause additional damage particularly with the faster flowing water in the rainy season.

Unofficial boatyard

The overstaying visiting boats and the way they abuse the area and the overnight sleeper vans. The number of boats moored preventing us getting near the rivers edge to feed the ducks and look for wildlife in the water . Bicycles etc on the verge the amount of traffic and the speed they drive.

Disruption to the above caused by moorings

N/A

Lane is too narrow for large lorries and parked cars

Little, waste, noise, stray dogs, loud music

It has become run down, littered, and looks an eyesore. It discourages me and my family from using the area.

The poor condition of the river banks, litter and rubbish.

Seeing some boats illegally tied to trees etc

Untidy boats and unwelcoming residents

being used as a rubbish dump lately

litter left by visitors and the mess from some boat owners

Nothing

Boat traffic damaging the precious habitat

all the litter

Traffic

the boats mooring and disturbing the local wildlife .

Cars park on River bank causing traffic and danger. Boaters leaving their belongings and rubbish along the bank.

Narrative - Responses

Abuse received by residents, litter left by picnickers, noisy groups, Dogs fouling the area.

Traffic

The number of boats that are now moored there

the number of long term moorings there.

The old and dilapidated boats that are now moored there along with many cars and vans and the noise associated with them.

litter

traffic

Motor traffic and moored boats

Traffic

House boats spoiling the beauty and no doubt polluting the river

Busy road

all the boats

Moored boats and the impact they have on the river bank including litter

The unsightly mess that has recently appeared along the river in the form of shabby boats & vehicles parking on the white lines & just about everywhere, taking away ALL that is lovely along the river

Too many people in the summer!

Not as nice as it could be. Need to make more of this local asset

Traffic

The parking during summer periods

Nothing

River congestion and pollution. Air noise from low flying commercial planes.

The dirt there from the residents of the boats

Rubbish being dumped there

Cars driving and too many boats moored along the river bank

At the moment the disruption of a once peaceful and pleasant river walk

nothing

the untidy areas of the area

Litter, damage to the banks

untidyness

traffic, scruffiness, loss of peace

The mess from the boats left on the side of the riverbank

Abuse by a small group of people

Traffic congestion and undesirable moorers and their dogs and untidiness

Large vessel moored for short and long periods damaging the riverbank and polluting the environment

It is now a scruffy unpleasant area full of rubbish and you can no longer walk on the grass verges as they are too overgrown.

Untidy boats, mess on the river bank.

The rubbish

The difficulties with traffic coming along and not being able to drive through smoothly, because of vehicles parked on the side of the road

over development and access issues

NA

There is nothing I dislike about Mead Lane.

Narrative - Responses

Amount of traffic

The number of boats moored there & parked cars
cars on side of the road, boats taking up all the bank space
buildup of river traffic seemingly permanently on river bank

Traffic

Cars travelling too fast.

Traffic levels from waterworks and cars parked on the road alongside boats
Ruined by a shanty town of travellers in boats who pay nothing and over stay their

Occasional pockets of hostility/photographs taken without permission

It should be a nice spot to enjoy the views or scenery, but too often there are cars parks all the way along it spoiling the view and making it too busy and also unsafe to walk along with young children.

Litter

The cars parked on river bank.

I dislike the fact that nobody seems to look after the area. We regularly remove rubbish as we walk but some is too large and heavy to carry. The boats moored to the bank ignore restrictions, which are not enforced apparently. Some boats are in a state of disrepair and quite neglected. Ducks and swans which were quite a normal sight when we moved here 4 years ago are no longer in evidence and it has been a long time since we have seen a fishes jumping in the river. It is becoming neglected and depressing.

General feeling of neglect- derelict buildings and boats in a poor state of repair

Pollution

nothing

Mess

the residents

Nowhere to park by the river when there are cars alongside the boats, I've noticed a decline in the wildlife on the river since the moorings have been there, not so peaceful anymore

The smell of boat exhaust fumes and campervans parked along the river

Traffic

The narrow boats and various craft of indeterminate origin, some in poor condition. People manning these craft have been seen by me "skinny dipping" which is not acceptable behaviour in my view.

The effect on the environment of the recently moored barges/boats

Nothing in particular

Aquatic tramps (the behaviour of people moored on poorly maintained boats)

noisy residents and unsocial behaviour

Scruffy

Prone to flooding

over the last few yrs. moored upboats, under repair etc. noise, mess, litter on the bank. also, floats, some, scum, fuel. etc @ the waters edge, parked, vans, pickups, small trucks. all reducing the road to single track, which means the BANES. Water Board & pub lorries, mount & damage the grass verge. Children have been hurt when walking on the grass bank, from the hidden (grass) mooring staks & lines. It appears fewer holiday boats (one nighters) are able to moor ! .

The mess and unsightly 'scrap' boats left on the river there

Litter

The rubbish and unsociable behaviour that you see there occasionally

Narrative - Responses

Buildings and cars

Tyre marks on the grass verge

The Rubbish. Lack of suitable walk ways and the human impact

The riverbank is now ugly and unusable.

The mooring of the boats and barges there has led to problems with rubbish, occasional antisocial behaviour from certain parties, and a bespoiling of the river bank habitat. This should without doubt be an area prohibited for moorings and, instead, encouraged into a Natural wildlife reserve. Currently, the unsightly vessels moored there and the damage to the bank caused by vehicles.

Moorings

Rather untidy

traffic

Boat clutter and litter

Riverbank being spoilt by rubbish associated with boats

mess caused by boat berths

Not suitable for long term moorings

long stay parking of cars and canal boats

Can be busy with cars and barges particularly in the summer

Old wreck boats, using bank as builders yard

Traffic on narrow road.

RUBBISH

The mess from moored boats and spoiled views

The river bank crowded with boats, vehicles, clutter and sometimes rubbish.

litter

numerous boats 'claiming' bank as their garden

Nothing

The mess

Poor footpaths

Litter, would be good to add screens to allow changing

The area becoming like a trash yard

The rubbish and spoilt river banks

Long stay moorings / Heavy traffic

snobby residents, who want to keep it all for themselves,.. very selfish.

too busy in the summer and the fact that the riverbank is showing signs of deterioration

Any attempt to spoil the view as God created it.

Boats moored up making a mess

litter and too many houseboats

Lots of moored boats

Boats

The otters

cars, house boats parking, and using the verge for BBQs, and their possessions

Untidy boats and parked vehicles creating a hazard to invalid walkers such as myself

River gipsies mooring along the lamost entire length

cars, house boats

The mess and human waste left by moored boats

Busy traffic

Narrative - Responses

pollution and environmental risk to the river and bankside. location.

When it gets busy - boats and day trippers.

Intimidating boaters plus their boat moorings mean you can't walk along the bank

N/A

I rarely see the wildlife,inc the swans,that have always been present in the past

Too many cars parked.also boats moored for too long.

Heavy traffic at times through to the Pub at weekends and parking on the river bank also now moorings which look out of place.

litter

UNSIGHTLY RUBBISH

Next to the river - watching the boats

Cars

Nothing it's beautiful

The traffic occasionally

The rubbish that has appeared on the banks

Lots of boats

It has become tip, associated with the mooring of boats, the parking of the owners vehicals and their extended presence has undermined the viability of the area as an accessible window for all to enjoy into the natutal history of Salltford

Random boats and vans

The damage to and obstruction of the habitat caused by the mooring of boats and the constant presence of their human occupants and their pets ugh the (especially to the mature trees and the trampling ling down of plant life) caused by the mooring on the riverside with its attendant dangerous congestion alongside what is already a busy and narrow lane. There is also the impact of human pollution both on the bank and the in river itself.

Rubbish on the banks and visiteres sitting on the bank smoking pot openly with families around on warm sunny days.

Overstaying moored boats

seeing litter on the riverbank and bottles,car wheels, etc in the river

Pub traffic

Nothing

dangerous walking sometimes

Road

The untidy boats limiting access

Beautiful views of river, meadows Kelston and Lansdown

The boats with permanent cars parked next to them

Pollution and disturbance of wildlife by boats and associated vans and cars parked next to them

I'm concerned that the current moorings there are physically affecting the river bank itself as well as any wildlife that inhabits or feeds from the bank there. I'm not sure whether they were from temporary moorings but I've also seen really antisocial behaviour this summer - groups of loud young males, more than must live on a boat, drinking and smoking, standing on the bank and road - and have felt for the people living in Mead Lane. My 12-yr old nephew was also bitten by a barge dog as he walked past a few months ago.

CAN BE QUITE BUSY WITH WESSEX WATER AND OTHER VEHICLES

How cluttered it has become

narrow road, worst when vans are parked along there

is unsuitable and impracticable for moorings which require continual management

Narrative - Responses

Parked vehicles, traffic, crowded bank

invasion of boats, van and cars

At present the boats and rubbish at the edge of river, also the cars travel too fast

Long term car and van parking and mooring

Moored canal boats restricting use of river and polluting the area

It has become a threatening enclosed area

Current car parking / increase in rubbish / increase in mooring boats

Fast Traffic

At present the overbearing presence of boats and barges

The mooring of the boats

All the boats which have recently appeared, spoiling the riverbank, with their rubbish and unsightly boats. It is totally unacceptable that people have misused the area in recent months!!

Litter left after BBQs and noisy music from boats

Overused and busy road and waterway. I live and work down Mead Lane. The Wessex water traffic is inevitable, however sometimes the parking along the road and overstaying house boaters are an issue

The boats moored along the river bank and the heavy vehicles driving to and from Wessex Water

The mess and lack of consideration for others

The location gets extremely busy and sometimes over run with boats moored. I know they often overstay and are very loud. Sometimes nowhere to get in and out of the river when swimming or kayaking

parked vehicles

How busy the small road gets sometimes...and litter

People not respecting the place and leaving litter in the summer months and driving too fast under the bridge at the bird in hand

Nothing really, water works and pub makes traffic inevitable

The local teenagers who leave rubbish

The sailing club

The residents there is a tension, they do not engage or say morning/evening etc

The permanent moored boats and restricted access to the river bank

local residents antisocial behaviour, the feeling of being unwelcome

Nothing

Boats blocking said views & litter

Viciousness of abuse by local residents, it's really not called for, they are all rich and educated so they should know better to pick on people who are poorer than they are.

Traffic, unauthorised parking and residential mooring.

just the feeling that the neighbours don't want me there

additional boats and disruption from more people, general litter

the number of moored boats

The cars parked along the road and not being able to see the river due to all of the boats

Traffic and parking makes it unsafe to walk

They have damaged the banks, the trees and plants. We can't get there to fish after being fishing since I was six. Dog mess everywhere with rubbish and other stuff on the banks. If you complain they tell you f off.

To many cars

n/a

Nothing

Narrative - Responses

The unregulated parking, the traffic jams which we get during the summer months and the unrestricted parking on the river bank by transit/traveller vans and their associated boats which monopolise the river bank all year long.

Boats in the way of river access

Nothing it is great nice view, quiet road a pub and the people are friendly good walks for the dog and adjacent to the cycle path...oh and a post office up the way, and the book stall and the other pub

Litter

Congestion on the riverbank

(currently) boats moored eternally in summer along much of bank, obscuring view, degrading wildlife habitat, associated road vehicles cluttering up the road, etc.

Current despoilation of the river bank and surrounding area.

If cars drive too fast along the road

It seems locals would prefer boats not to moor there

Hard to say. It's a great mooring

Boats moored there are spoiling the views and causing considerable damage to the environment.

People from the boats are behaving in an antisocial manner and engaging in criminal activity.

Nothing, it is fine just as it is.

Full of river craft, parked cars, litter, noise no where to fish

cars going by

Pressure on space

The sight of some of the less well maintained boats

Boats mooring/ leaving a mess

Boats moored and litter

The area has been occupied by people living on boats moored along this length

Scenery ruined by ugly boats

The area has been occupied by people living on boats moored along this length

I used to go there every day but it has been taken over by boats. Some are pleasant but there are some very rude and abusive people who don't have their dogs on leads and let them foul the banks and go for dogs on leads. I only go at weekends when someone can take me.

Camper vans etc. associated with the boats. seeing the destruction of the river bank and wildlife.

Vehicles associated with boats clogging up the narrow road and posing a danger to others. Health

and safety and environmental issues though mainly!!

all the boats moored there in the summer months

Boats mooring without respect for the environment or the residents

being spoiled by refuse /pollution from boats

THE BOATS MOORED ALONG THE BANKS.

Racing along Mead Lane by some morons

The ugly unkept boats moored there for weeks on end.

Being confronted by residents that feel boaters are getting what they have cheaper, and think the mooring enforcement is under their authority.

Illegally moored vessels that are interfering with the fishing, the rights of which are leased to the Bathampton Angling Association by the Dutchy Of Cornwall

Moored boats

Narrative - Responses

Abundance of parked vehicles and moored boats.

The cars & traffic - my children are still young enough for this to be stressful.

Peoples lack of care for the area.

long term mooring

Not enough places to stop and enjoy the view

Destruction of the riverbank

The traffic to the pub

The moorings

In recent years the area has become occupied by many boats. Many seem to be more or less permanent. These boats seriously restrict areas available for fishing or picnicking. The area has become too used and 'scruffy' that conflicts with the natural environment. The area is no longer relaxed and a threatening feel pervades. In simple terms the presence of the boats has ruined this, what was a very valuable area.

The unsavoury types that seem to moor there lately.

The more jarring of the modern buildings, incongruous with the quaint landscape.

Too busy in summer

Boaters

Nothing. Great location for all in my opinion.

Too many boats now moored here

moorers that over stay

Intimidation

Harassment and abuse from residents when walking my dog.

Locals being aggressive

the attitude of some of the people who live in the houses, they are REALLY nasty towards boaters and do all sorts of things that they themselves would not tolerate for a minute if it was done to them, harassment.

Busy

Boats moored on access points

boat moorings blocking access

Rubbish from boats, foul language, dogs off leads recently

Rubbish from boats, foul language,dogs off lead recently

The pompous nature of the residents!

LACK OF PARKING

The overstaying by some boaters who hog the moorings

I can't get near the river anymore as all the banks are full of boats. Also the bank has been ruined by the over use , dumping of rubbish and boat owners belongings. I don't go often now due to the boats, but I used to go there a lot

Speeding cars, no pavement and large lorries going to the sewage works

At present boats with people living on them.

Far too congested due to too many boats. Many outstay their allotted time. Waste and human excrement.

Have not attended frequently enough to notice.

Some of the residents are very unfriendly which is a shame because this attitude is rare on the waterways.

The residents

That the residents have been hostile to us in the past.

Cars nearby

Narrative - Responses

nothing

unable to fish due to too many boats parked up

Residents. Harassment and intimidation

My brother who I visit on the mooring occasionally has told me there has been a longstanding snottiness from residents of Mead Lane as they don't want boats mooring and spoiling their view.

Interference by residents

distance to supermarket

The traveller type boat people that seem to frequent there.

There is an increasing feeling of harassment by some locals.

The access used to be easier

couldnt say

Parking

Lack of / availability of mooring spots due to overstayers

couldnt say

Nothing

Aggression from residents who verbally attack all boaters

Nothing it is a lovely spot to moor and to walk to and enjoy via foot

Pot holes

no public slipway not being able to put boats in after bath side lock boats in water

Traffic

TRAFFIC

Attitude

there are some ignorant, rude and aggressive residents, who look down their noses and judge all boaters, based on their choice of lifestyle.

The rude, prejudice, narrow minded residents who spy on us and harass us

Too many boats

The attitude & hostility of some of the residents

Traffic jams on a narrow road

Residents of near houses

I like all of it!

Hostile residents

People who dont pick up their dogs shit

The fact that the boatyard is falling into disuse.

The weather

The social cleansing intentions of the brick and mortar local residents.

The houses are a shame. It needs more boating facilities.

Hostility towards marginalised groups

That the residents are sometimes hostile to boaters for 'spoiling' their view

N/a

Overzealous mowing regime. Litter.

The residents who have harassed my sister and her newborn baby, taken photos of their boat and called them 'scum' and 'you people' - completely uncalled for and abusive restrictive parking.

Weather the petty mindedness I've witnessed on occasion

Attitude of local residents

Narrative - Responses

Knowing that there is a clear conflict of interests between residents and the people who live, work, or enjoy canal life.

The behaviour of some residents towards boaters

Traffic

There are some boaters who I am fearful of running in to now so I wouldn't visit. I experienced sexual and domestic violence during my time as a boater and the perpetrator is being protected by the people here trying to downplay the behaviour. Not all boaters are scum. But some people really are. I've experienced it first hand and I feel sorry for these residents being intimidated outside their homes. It's unfortunate this small but prominent group of disrespectful, alcoholic and crack smoking boaters cause so much damage it's made people feel intimidated. The problem is with certain people though. Not all boaters. Unfortunately these certain people never move as don't respect any rules.

Long term moored boats

I've never experienced any issues

The very few troublemakers

Negative attitude of some local residents

The conflict

It feels "edgy"

Heavy traffic in summer months

The bigoted attitude of the local residents

Nothing

Nothing

Boats moored with rubbish and old cars and Vans parked on the verges making even walking dangerous

Nothing

nothing

One or two very rude locals

Attitude from local residents.

Prejudice

The houses nearby

Overstaying boats, boaters rubbish, badly parked cars, noise from boats

Uncertainty about future mooring spaces.

The parking on the verge, the cars parking on the dangerous corners. The rubbish left on the river bank, the problem with accessing the river due to parked cars and too many moored boats. The muck thrown into the river. The verbal abuse from some of the people on the boats.

feeling spied on, lack of privacy and some levels of abuse by residents

I rarely moor there as I have a cat and worry about the proximity of the road

needs more moorings would love to be here a lot more

Nothing!

It was just small bungalows, now mostly repacked by luxury houses, the owners appear to want a theme river for themselves not a working river for all

The people that unfortunately drop litter and disrespect the natural area and blame this on the boat dwellers that (mostly) work hard to care for and protect the area they adore inhabiting

The abuse boaters suffer from residents

Prejudice from local housed residents

Hill back up to Saltford. A lot of boats moored with little amenities.

Nothing

Narrative - Responses

n/a

The bank is no longer accessible due to the number of boats moored right along the length of Mead Lane

The residents hounding us!!

Nothing it always seems lovely

When end to end boats it feels like a canal, not a river.

Boats and the wildlife

Some occasional rudeness from local residents

Scruffy boats and vehicles belonging to boat owners spoiling the views

Busy

Passers by leaving rubbish

The boats

The travellers transit site it has become.

Traffic

The antagonistic, entitled aggressive residents that harass as soon as you moor.

Nothing it's really nice.

Nervous when cars travelling along as there is o where to protect myself with my dog

Cars/Vans and too many moored boats

It can be busy. The anti-boater sentiment from some of the residents who live there.

The tension that has appeared between boaters and residents

Conservative approach to closing off the waterways

ALL THE BOATS THAT ARE THERE AND HAVE NO CONCERN

Rude arrogant boat hating residents

Nothing

nothing really , guess sometimes its hard to find a spot but thats all part of it.

The rude residents that think they own the river

I have come across some rude homeowners on Mead Lane (and some friendly) who disrespect boat dwellers. I have done a litter pick on Mead Lane left by some people picnicking (please note not boat dwellers), there must be a better solution to this than closing the mooring, I feel that boat dwellers are the scape goats (unfairly) for any public wrongdoing.

harassment from one or two local residents

Obstructive car parking and double/triple mooring of boats along the riverbank denying anyone else access

Biggoted residents. The abuse and hostility boaters receive from them.

Very little. I was once subject to some minor road rage due to parking.

The residents of the houses and the fishermen - I ahve been subject to verbal abuse from both - we never moor there for more than 48 hours as we have a nearby home mooring but we still get treated like we are second class citizens for no reason

House Residents' delusions of grandeur regarding the fact that because they may have spent ridiculous amounts of money on a house they therefore own the river too.

The drunken teenagers, and the aggressive cyclists on mountain bikes. I have witnessed aggressive behaviour towards boater from residents, even towards mums holding babies! Shocking

The current mess left by boaters

Nimbyism in residents we have to visir

The residents who verbally abuse us

The residents who seem to have nothing better to do with their lives than complain at every tiny opportunity

litter from uncaring mooring visitors.

After a quiet winter the boats start arriving in the spring. There is nose- to-tail mooring, overnight parking and sleeping in vans, dogs barking and often running loose, loud music, generators and machinery repairing boats. Because many of the boats tie up on the traffic bollards many have been pulled out. Because of the mooring ropes, the council can't maintain the banks and it is difficult to walk on the grass. There has been unsociable and aggressive behaviour. Fishermen have been moved on because boats wanted to moor. Boats are often moored double or triple. They are a law unto themselves. Mead Lane is a beautiful spot which has been turned into a slum during the summer.

It floods

The mess made by those mooring their boats and parking vehicles which make the road narrow in many places. You have tondodge in and out of these when walking.

boats moored and traffic

For much of the year, especially in summer, we are unable to access the river bank as it has become very crowded. There has been a lot of antisocial behaviour including verbal and physical abuse, pollution by boats and human waste, drug taking and selling, late night noise, littering and fly tipping. There has also been considerable damage to flora and fauna and to public and private property. Access to the river is limited because boats are often moored end to end and two abreast. Mead Lane is a narrow road which is used by heavy vehicles visiting Wessex Water's treatment plant at the far end of the lane. Parked vans, mooring ropes and gang planks are often positioned next to and across the riverbank. These obstructions force pedestrians to walk in the middle of the road. We have no pavements here, so this can be dangerous.

The continuous monopoly of the boat owners that has had a disastrous impact on wildlife and holiday boaters who cannot ever find a mooring to use for example the jolly sailor

The old vans/small trucks and general mess around run-down boats moored for long periods of time whose occupants appear to treat the area as a traveller site.

Scruffy canal boats

It has now become a parking place for all manner of boats, which bring with them their cars and their animals, thus driving away the wild life. In addition each mooring damages the river bank, quite apart from their associated detritus.

Access can be difficult as narrow road with various users (car, pedestrian, cyclist) these problems are exacerbated by vehicles parked along the roads, particularly on the verges

Pollution and litter

The boats, further up river there is a marina and more facilities for boats. Apart from fishing it is a lovely place to sit but now loads of rubbish and dogs barking at you.

Traffic and Noise to the Jolly Sailor

People are trying to stop the 2 week moorings

Rubbish left, thoughtless and uncivil users

The behaviour of residents

Bad road surfaces

Nothing

The boaters that clearly avoid genuine costs like genuine boaters

The fast erosion of the natural fauna & flora.

Congestion and litter

The number of barges blocking the bank.

It used to be a welcome and pleasant sight to see the occasional boat on the river here but since about 2013/4 onwards the gradual take-over of the riverbank and associated damage by moored boats, often incorrectly moored to trees and parking bollards, in the warmer months has taken away access for members of the general public and scared away much of the wildlife. The junk

Narrative - Responses

and large amount of litter left on the riverbank during moorings or when boats leave together with tree and plant damage. Use of the riverbank and lane as a boat and van or car repair yard. Watercourse pollution due to lack of suitable facilities for long term (over 48 hours) moorings. Those problems together with congestion caused by parked vehicles associated with the boats and vans used for overnight sleeping has increasingly ruined the character and peacefulness of this previously idyllic rural riverside lane. The lack of any monitoring, management or enforcement of moorings practices by B&NES Council or the Canal and River Trust. I am now much less likely to take visitors for a walk along the river here. The anti-social behaviour of a hard core minority of boaters has been shocking.

I has been reduced to an often forbidding and dirty place, where a few are exploiting and damaging the sensitive environment

The monopolisation of the riverbank by boats excluding others from access. Heavy littering by a minority of boat users who leave their rubbish behind on the riverbank when they leave but also spread their personal possessions over the grassed areas of the riverbank which is supposed to be a public space. Numerous and constant mooring infringements such as tying boats to trees, double or even triple mooring that places further strain and thus damage to the riverbank and trees, and damage to parking bollards by their incorrect use as mooring posts. Damage to flora and fauna generally as the riverbank is not designed for boat mooring due to its lack of the necessary infrastructure such as purpose built embankments and pontoons appropriate for constant mooring, but that would be inappropriate at this location anyway. Noise and diesel fumes associated with the use of generators, power tools etc. Use of the narrow lane as a maintenance and repair yard for boat and associated vehicle repairs (including arc welding in a public space). Nose to tail parking of vehicles associated with boats in peak season, overnight sleeping in vehicles. Residents who are also SEG's members have observed and reported to the police or B&NES Council numerous incidents of anti-social behaviour including threatening behaviour towards residents, dog fouling, use of the riverbank and lane as a toilet (including a member's front garden), and long extended mooring periods vastly exceeding the 48 hour and 14 day limits to the exclusion of other users. The restricted and sometimes complete loss of riverbank access for members of the general public has become a major cause of concern to our members. PLEASE NOTE. SEG wishes to stress that it does not wish to be seen to be stigmatising all boaters, the majority do of course operate and moor their boats within the law, but we have serious concerns about the abuse by a persistent minority before, during and since the mooring trial. SEG's response is about rescuing Salford's riverbank at Mead Lane and protecting the wildlife and this iconic location for the benefit of the vast majority of users.

additional boats and disruption from more people

The cars parked along the bank.

Vehicles parked 'off road'.

its become ,an eyesore now with people mooring all along that stretch. its such a shame ,as its so natural and a beautiful place to sit and reflect .

Access can occasionally be difficult because of other local traffic, but the area lends itself to considerable abuse if additional traffic, including river traffic and additional and/or permanent moorings are allowed.

Nothing.

Neighbours who can be hostile

lack of properly scheduled moorings

Nothing I can think of

Harrasment from house owners

The number of moored boats and resulting impact on the location

Narrative - Responses

Now spoilt with wall to wall boats and dodging between all the parked vehicles belonging to the boat people . This becomes dangerous on what is a busy lane with all the traffic going to the various businesses at the end.

Snotty behaviour

there is never much space to moor

Not sure

The beauty of the countryside

That local residents don't appear to want boaters there

There have been some upsetting incidents of antisocial behaviour towards boaters from local residents

Nothing it is perfect

The unfriendliness of some of the residents

Can be busy

The increased noise pollution from excess cars, trucks and boats.

n

that you can't see the river as there are so many boats

The occasional aggressive resident

Due to all the animosity from local residents, I am made to feel unwelcome

It's very busy and on sunny weekends the road is like a super highway

The way this has become politicised by two entrenched groups that are now bringing third parties under a pretence to enable them to tip the balance in the favour. Very sad state of affairs.

Conflict

Not much to complain about really.

Mooring is busy because there isn't many other mooring locations

Boats parking where they are not allowed blocking access

Untidy boats with lots of rubbish on them

Intolerance

The water quality due to sewage being discharged from boats

That it is cluttered with floating junkyards and live aboard boats in various states of disrepair that do not seem to respect the space or other river users

Nothing

Traffic

Nothing

Inconsiderate residents who make mooring difficult. If they don't like boats then why buy a house by a river?

The residents who show extreme prejudice against the boating community.

Boats overstaying the mooring restrictions and related vans

Houseboats

Cars parked on the road

increased traffic

The tatty boats moored on the river and associated parking

Moorings, swimming, weed smoking by young crowd

Moorings

Boats every where .river going through saltford being distorted from boaters.

increased amount of parked vehicles in many cases belonging to the moored boats.

Narrative - Responses

The amount of narrow boats stopping you from getting to the bank, the rubbish, the amount of seemingly permanent cars blocking the road and the smell sometimes which I can only assume is from the boats discharging their wastes into the river.

Cars driving by too fast

Can be quite intimidating with people's stuff all over the bank, slightly lairy boaters, BBQs and beer bottles were all over the bank and into the road one time

Massive houses. Speeding drivers that go to Jolly Sailor.

No problem foreseen apart from Traffic

Pollution rubbish

Cars parked on bank side and too many boats moored

The road is so busy, people drive too fast along, there are a lot of visitors and they leave rubbish and make noise. The residents are very unfriendly and very afraid of their house prices being affected by anti-social behaviour. It's a shame but boaters are being asked to do more mileage by CRT and so people are moving in to the river to get their distance in. I feel really unwelcome when we moor there but that's what the residents want.

Now spoiled with wall to wall boats

Boats moored without consideration, vehicles obstructing road and damaging the verge, litter from boat owners.

Sailing club members are very rude sometimes

Annoying snotty local Residents

Anti-social behaviour

Boats

Intrusive noise by some moored boat users and screaming and splashing of paddle-board users.

rubbish and belongings of boats on riverside

Boats moored alongside road, cars parked on verge spoil this beautiful area.

The traffic

Nothing it is a terrible ill thought out option for moorings with no supporting infrastructure

Some of the locals seem a little off about boaters but others are great

Intrusive noise, whether from moored boats, watersporters or others

Traffic, especially vans etc also badly lit at night

Litter

boats everywhere

boats blocking the river

The crowds of visitors who block the raids with their cars, noise and litter. People picnicking in the bank can be really antisocial too. I'm afraid that some of the riverboats really spoil the feeling down there too.

The limited number of abusive local residents. The local residents who moor boats at mead lane unlicensed

That I might not be able to moor

Unfriendly residents. Considering it's a village. The residents on mead lane don't even make eye contact with you. It feels like they think you are beneath them. Although the local pubs and shops people are really nice. It just seems to be the mead lane residents that are unfriendly.

The boats that are ruining the environment down there.

Too many boats that shouldn't be there permanently

Noise / ASB from minority of overstaying boaters

Messy boats and untidy stuff on the river banks.

Litter and damage

Narrative - Responses

It's very crowded in the summer

Very untidy with riverbank disfigured. Some very unsightly boats moored.

The mean residents

Boats and vans. Loose dogs

Traffic in the summer

The volume of traffic and difficulty of walking safely with dogs, when there are lots of parked vehicles.

cars parked along side the road on the river bank, the mess and litter produced by some of the irresponsible boat owners moored up.

Overstaying boats and antisocial behaviour by boaters

Difficulty negotiating the road on busy weekends

Rubbish

The awareness of being to some extent unwelcome

Nothing

Possible trouble with locals

No complaints

Rude and aggressive residents

Boaters vehicles and rubbish

Not enough places to moor

Not a lot to dislike

traffic in summer and too many boats and noise

Local NIMBIES

Tragic going to the water works driving to fast.

The cars speeding down it

Chaotic scene and litter

Increase in car parking. Boats disturbing view. We have a marina further up the river.

None

The way this has been ruined by boat moorings, including all the mess that some of these people make

Litter

The residents complaining about completely 'legal' behaviour.

The rubbish and how busy it has become

Unregulated moorings which sprawl along the verges

noisy residents and unsocial behaviour

the boats that ruin the environment

Boats moored up so you can't get to the water and cars / rubbish belonging to the boats all along the banks

Traffic and untidy boats.

moored boats it is almost impossible to fish there.

Harassment by the local residents of the houses in Mead Lane - that's why I don't like it. I'd moor somewhere else if I could but there's almost nowhere.

Rubbish left by picnickers and people fishing.

It has become full of moored boats lately. Few sign of the ducks and swans for a while

People overstay

Started to look messy as more boats moored up

Narrative - Responses

The damage of flora & fauna & the unmanaged moored boats overstaying & the anti social behaviour being the outcome of this.

Some negativity from a small minority of residents.

Canoeists parking everywhere and rubbish left by people visiting the area with no regards to the wildlife or others wishing to use the area.

Overcrowded with boats, their belongings incl. vehicles, and their noise. The boats prevent me from walking safely on the river bank. Damage to trees and riverbank by boat mooring ropes. I visit less often now because the area has been spoilt.

NIMBYs

The boats which spoil the above

The current boat moorings which significantly detract from the scene.

The mess and how busy it is getting.

The intimidating atmosphere created by some residents

Wildlife disappearing, crowded river banks, lots of congestion on the road which makes it difficult to take the kids down for a cycle along the river.

cars

Tension between boat owners and residents due to lack of clarity on stay times etc

The amount of moored boats restricting the size of the river causing obstructions and turning it into a floating shanty town

Nothing

The aggressive residents and prejudiced residents.

Too many boats moored

Being harassed, having residents coming out of their houses, peering in my van and boat

Wall to wall boats, parking of large vans (some now being parked in Avon Lane), rubbish left on banks. No space for people to sit or fish and enjoy the river

"permanent" moored boats and their associated cars, bikes, mess on the river bank.

Serious deterioration in ability to use the riverbank since primarily occupied by boat users vehicles etc. Deterioration in wildlife seen in this area

The permanent boats creating rubbish and pollution to the area

residents seem anti-boat and are quite rude

Residents antisocial behaviour to compliant boaters

overstaying boats and car parking

The congestion due to parking, the litter both on the road and in the river

Anti-social behaviour of some moored boat owners

The change of atmosphere - the damage to the environment - the lack of respect for the once interrupted view across the river

Nothing

Canoes everywhere blocking the path and being ignorant towards other users. Cars full of youths playing loud music. Not being able to get near the river for anglers

Once the boats arrived they made lots of mess and wrecked the river bank. Now there is nowhere to picnic or for fishing. Totally spoilt the once delightful amenity for Salford residents and visitors to our riverside pubs.

Too many boats moored and all the cars and vans parked on the river Bank just making everything look ugly and no. Clear access to the water. Several years ago I could watch otters in the water if I was going to the pub. Now I can barely see the water anymore

Mess on the river bank

Fast traffic, when there are parked cars on bank verges when I see litter and river pollution

The abuse I have had from residents

Narrative - Responses

What is there to dislike!

Nothing

The travellers moorings

Officious council types trying to stop people from living their lives

The abusive and prejudiced behaviour of the local house-dwelling residents and the failure of the council to address this properly

Other boaters have described experiencing "difficulties" with select residents

NA

Boat moorings

Banks fully parked and moored

The attitude of the residents

The grumpy residents and noisy cars partying in the road

Spray painted old boats and vehicles

Noisy / antisocial boat residence in the summer (drinking and smoking cannabis)

Mess left

Boat traffic damaging the precious habitat

The residents who are in the houses are abusive, spy on boaters, take photos and treat me like a homeless vagrant thief.

Roads are a bit narrow

Continuous cruisers and rubbish

Too many static boats

The fact that that the mooring rules are not enforced.

Proximity to the cycle path, the two pubs

Semi permanent moorers spoiling it for everyone

Residents complaining

Rubbish left by boats

The erosion of the riverbank by vehicles parking on the grass verge of the riverbank. Boats tying ropes round trees and the litter.

Inconsiderate boat owners

The traffic that has recently grown there often leading to uncomfortable situations.

The anti social behaviour of a small number of residents (who make boaters unwelcome) and a small number of other moorers (who overstay and/or do not respect other users and residents)

The wildlife that no longer as banks no longer usable. The swans used to nest on the bank. The pollution when Ch was never there.

Noise. Rubbish. Could be some benches?

Permanent boats. Not easy to park or get on water.

Nothing

Local residents with notebooks looking for reasons to complain

Nimbys

The fact that the moored boats pay no council tax, do not move at all except to swap place with another boat

It can be hard to find a mooring

Nothing

Nothing

Local

Narrative - Responses

The local residents are horrific, they have had my partner in tears with their vile behaviour towards boaters

The debris left by moored boats

the unwelcoming suspicious residents

Its now a mess. Scruffy boats and too many vehicles and is untidy

Dog mess

n/a

the moorings are not fully supported by the local authority

the attitude of local residence, very off putting when they are taking photos of you first thing in the morning and making sdude cometns about boaters not working when i work full time all year

the visiting boaters

Home owners

Rubbish, when it's too busy with boats and visitors!

Ditto

Often busy with boats that seem to be there a long time.

Too many boats along the river making it look a mess

Long term micky taking mooring

Constant music and drug smell from boats

The few people that abuse the area and upset the vast majority of caring boaters and residents who respect the environment of this amenity area

The friction from resident who think all boaters are gypsies, tramps and thieves.

the fact that it has changed to a litter ridden ugly area

Nothing

parking on narrow verge and endless boats moored

mess

The residents constantly trying to get boaters not to moor there.

continuous moorers

Rubbish left by kids

The heavy littering, noise, damage done to parking bollards, riverbank, trees, flora and fauna and the congestion of the lane exacerbated by moored boats and their attendant vehicles. Numerous incidents of anti-social behaviour by a minority of boaters as reported to B&NES and the police by local residents. Overnight sleeping in vehicles in the lane. Ill-advised winter moorings causing damage to the riverbank etc. and posing safety risks to others and the boat owners who seek to use this as a free winter-mooring despite its unsuitability due to seasonal rapid currents and flood risks. Loss of access for all. The health and safety risks for the general public associated with moorings ropes, boat and vehicle repairs on the riverbank and in the lane itself.

constant anti boating groups

Nothing

Too many boats stay for too long, making the moorings difficult or impossible for leisure boaters.

domestic housing

Too many residential boats

Interfering locals, yobs.

the moorers who abuse the mooring conditions

The Nimby's

Rude residents. Many louts. Lots of rubbish. People climbing on boats. Theft.

The mooring of boats all along the riverbank preventing others from accessing the riverbank and blocking the view. The double mooring of boats that restrict the passage of other craft on the

Narrative - Responses

river. Illegal car parking in Mead Lane that makes it dangerous for walkers who are forced into the road as they cannot walk along the grass verge due to mooring lines and boatowners' belongings.

The smell of the smoke from the chimneys of the moored boats and the vehicle exhausts.

Nothing

Lack of Wildlife, over crowding.

Rough people and my dog was attacked

It no longer feels safe, and is very dirty.

The number of boats who overstay the mooring restrictions, which should be tightly enforced

The tension created by the local residents in regard to the right of mooring boat for a period of 14 days

Boats moored and obstructing view and making mess

Nothing really but the stand-offish behaviour of the house owners is unpleasant.

No access to water

Fast traffic usually delivery vans, cars parked awkwardly, rubbish and some dogs on the boats are aggressive and not controlled.

Speed of traffic

Too many moorings

The rubbish created by boats etc.

Now resembles a boat park

Wessex water vans and rubbish/untidiness of moorings

Nothing

Unpleasant views brought by the "continuous cruisers "

sometimes littered

Litter, disrepair & emissions from some boats, traffic and parked vehicles

The rubbish and damage to trees by the boats.

Harassment from land dwellers

N/a

Speeding cars

Untidiness and disrespect of environment by some moorings.

Can't think of anything in particular.... Revellers from the pubs occasionally being a bit boisterous.

But I would say that as a teetotaler...

Not feeling at ease around people with moored boats

It's a shame there is animosity towards boaters from just one or two residents, it would be nice to heal any divides

Lorries going to sewage works

Not being able to use it unsavoury characters

The state of the boats and moorings

NIMBY residents (why live there if you don't like river boats?). They used to put up no mooring signs of their own at one time.

Residents whinging about boats.

Ugly modern houses that haven't even tried to blend in with their surroundings or style of local houses

The mess since the moorings have been there

Moorers that overstay.

You can't walk along the river bank or avoid cars

Moorings, rude adults, litter, noise

People

The residential boats are now causing issues

The mess and antisocial behaviour

The boats the dogs and all the rubbish

all the cars parked with all the boats

Parking

The rude people that are mooring and unruly dogs, somebody I know dog was attacked .

Occasional litter from walkers and residents not just boaters

Noise, mess from moored boats.

Attracts noisy visitors

The mess and litter from the boats

The ugly live aboard boats

angry homeowners

Wessex water traffic

the attitude and perceived entitlement of house residents

The attitude of the residents who appear to believe the road, riverbank, river and view belong solely to them

I dont like knowing the residential neighbours dont want me there. I dont like the run off into the river.

The residents who live in the houses and the harassment and their antisocial behaviour towards boaters.

The mess and traffic problems caused by the non tax/ rate paying boaters.

Nothing but the shabby boats and ripped out posts are a nuisance. Some vehicles parked in such a way that the road is less safe for walking with children and dogs.

Very limited mooring.

The mess

Moorings taking up to much space

Too many boats and some are very uncared for

The current mess

Lack of understanding by local residents

Rubbish

The current state of it after allowing moorings

Nothing much really. Some moany residents now and again

Nothing

Sometimes there can be several passing cars and there is no pavement

Nothing

All the boats

Traffic, litter

Nothing

Damage to riverbank

The antisocial behaviour around it

Looking very scruffy these days

Currently too many boats moored

To busy

The cars and boats parked along the river edge

All good without moorings

Narrative - Responses

The tatty boats & mess on the banks cars parked everywhere

Feels trashy now with all the boats

Traffic congestion especially in summer

All the boats

Picnics/bbqs leave rubbish

The rubbish from the boats moored in the banks

not enough mooring places

The latest arrival of shabby boats that people are clearly living on! The river bank now looks messy and uncared for! It looks like travellers have arrived ! Junk scattered around, cars parked on grass verges, churning it all up! Nothing pretty there to see anymore! They have spoilt a real little beauty spot! It's such a shame to see it like this!

Pub traffic

The canal boats leaving the area messy, traffic on the road from parked cars etc from the boats.

Impact of boats on nature

The boats all along the banks

Untidy boats

Pollution, litter and human feces

Nothing

I have witnessed some of the residents being unreasonable, even aggressive about other people on the lane, that was a while ago, I hope this has stopped by now.

I worry about tension from local people

Speed of cars and rubbish on the floor

It's getting busy

There should be more rubbish and toilet provision.

Weekend visitors who have no regard for the environment and crowding of the river bank by long term boaters.

Abuse from house residents

No apparent regulations on boats that are moored there.

Traffic

Difficult to get to my fields because to many cars parking along the road and blocking my entrance

Cars

All the narrow boats mooring there that obstruct the views and their associated cars that reduced the width of the road making it dangerous for pedestrians, cyclists and other cars

It is surrounded by residents who continue to harass boaters

To many boats and cars by river

Lack of kayak launching

The inconsiderate boaters and people living in vans!

Traffic

The boy racers on the water and the road!

car drivers who throw litter out of their cars, boaters who run generators

Litter and badly moored boats

Hard to park sometimes

Youths in speedboats. Cars racing up and down the lane

The houses are so expensive I can't afford to buy one

Dog poo, larger groups thst leave rubbish

Narrative - Responses

The unfriendly people that live in the houses and we get all the blame for the cars rubbish that accumulates over the summer from people that come to visit for the day.. I have had to clear up rubbish from loud youths that come and have party's on the side of the river . Plus the speed that people drive down the road to the pub.

The smell of weed being smoked

A bit busy on a hot summer day maybe.

The smell of sewage coming off the water

All moorings taken by liveaboards. No room for visitors.

Cars

Moorings old scrap heaps moored throughout summer, noise pollution, water pollution and rubbish since moorings began

Neighbours policing as per their rules

Rude boaters, they're crappy cars and cabs and all the associated rubbish and drug paraphernalia

Boats

The horrible boats and rude boaters and rubbish!

No complaints

Minority of antagonistic locals misrepresenting boating community as messy and inconsiderate

-

Cars accessing the end at speed

The congestion

Boats parked on the riverbank restricting the width.

One or two residents seem distinctly unfriendly to boaters passing through that moor up for a night or two.

poor first impression

the boats

Nothing. Everything about it is fantastic.

Angry and aggressive residents targeting boaters

Moaning residents.

The distance from the bus stop, but that can't be helped!

Been photographed by residence

Neighbours with attitude

Current bad feelings

People coming out of their houses and telling me that I can only more there for a few few days

Vandalism, fouling, and abuse (verbal / physical) from some of the canal boat community temporally moored along the riverbank. Cars and vans parked on the riverbank in the lane causing huge restrictions to the traffic visiting / going to and from businesses at the far end of the lane and restricting access to residents driveways.

Some unfriendly local residents and fast cars

Not enough spots to moor always

The tension

Barges on the side looking a state

The use by "travellers" and people living seemingly under the "radar / off grid", in scruffy, polluting old boats (GR and old narrow boats). They contribute nothing to the area in fact they are living for free and are intimidating.

Nothing

heavy traffic during summer months due to vehicles parked up on Mead Lane. Some of the boats are unsightly. Litter being left by moored boats

Narrative - Responses

Other river users who are rude & disrespectful. Drunk members of public. Naked swimmers. Being sworn at by some other river users. 'Boy Racers' driving too fast up & down Mead Lane. The litter
Excessive parking in summer months

The people that moor up and stay longer than needed. Some of them are rude and offensive when you ask them to move when parked in front of the houses on the white lines. When they park on the white lines outside the houses it makes it difficult to get in and out of the driveways.
Curtain twitchers

Nothing it's a wonderful mixed community.

Intrusive behaviour by visitors

The abuse of that Open Access, by those individuals who do not care about the impact their selfish actions have upon others

Paranoid locals video boats and cars, most don't like boats and are very unwelcoming

Noise from people on boats (e.g. playing music), also in the summer the congestion from cars parked all along the road

harassment from one or two local residents

The awful look of the boats!

The utter domination of the public riverbank by the boating/traveller community.

Nothing

The litter

Parking

The people who own the houses next to the river harass the boaters everyday. I have moored there for 2 weeks this season and not one day went by with someone complaining about something or other. Something we do not experience anywhere else on the river/canal between Bristol and Great Bedwyn. They seem to be policing the area, monitoring your movements by boat and car and sticking notices on the boats even though they have no idea of the situations or of any invisible disabilities. It becomes quite stressful getting home from work to be faced with someone complaining about your lifestyle. The residents have built their own moorings without planning permission and put rowing boats there that they do not use in order to reduce mooring spots for liveaboards. Making it very hard to use the river in the way that we are allowed and pay to do.

People living on boat and in vehicles

Moaning residents

houses over looking idyllic river scene

Nothing

The rudeness of a minority of residents. The belief that the area is only for a few people. Some parts of the summer has more antisocial visitors that play music, leave litter and drive fast along the lane.

Can get a little busy (pub traffic) at weekends.

None.

The busy road

Narrow lanes. Fear of aggressive residents

Nothing

Moany house dwellers

Dog mess left on the bank. speeding cars along the road with loud music and bunches of loud mouth teenagers going to the pub

Its often busy and can be hard to find a space to moor. The residents have put in their own moorings on the 48 hour moorings that can make it tricky and sometimes dangerous to moor.

It can get quite congested with cars

Too many vans parked along the road, mainly belonging to the boat owners

Narrative - Responses

since the riverbank was discovered by the live aboard community the road and river bank has become used for the storage of bikes, cars, vans, garden furniture. It has also been used repeatedly as a workshop for people working on their cars and boats. We are also seeing oil spills in the water which is contaminating the river banks and soiling the hulls of the boats on the water. Vehicles overnight parking. Parking on verges. Other peoples litter. Dog fouling and dogs not on leads. Seeing the damage done to river bank

The moored boats, untidiness, cars parked obstructing pedestrians and traffic

The boats moored everywhere I feel quite intimidated

The residents are very rude

Big lorries

the damage caused to the river bank and trees by poorly moored boats (sometimes moored three deep), the construction activities (arc welding and generators running for long periods) pollution (oil and human waste from boats) and recent lack of wildlife...

People driving too fast and vans parked along the bank.

the boats, some make it look messy

APPENDIX 9 – Q9 - Options

Bath and North East Somerset Council are reviewing the Mead Lane Moorings following a trial period. Please give your views on the following options:

| | Strongly Support | | Support | | Neutral | | Do not support | | Not sure | | Total | |
|---|------------------|-------|---------|-------|---------|-------|----------------|-------|----------|-------|-----------------|-------------|
| | % | Count | % | Count | % | Count | % | Count | % | Count | | |
| Split of 48 hour and 14 day moorings (to remain the same as currently) | 18.53% | 171 | 11.27% | 104 | 11.38% | 105 | 55.15% | 509 | 3.68% | 34 | 923 | |
| More 14 day moorings and fewer 48 hour moorings | 18.71% | 171 | 6.56% | 60 | 12.91% | 118 | 59.63% | 545 | 2.19% | 20 | 914 | |
| More 48 hour moorings and fewer 14 day moorings | 8.94% | 81 | 9.27% | 84 | 15.67% | 142 | 63.02% | 571 | 3.09% | 28 | 906 | |
| Fewer moorings and riverbank managed as open space | 27.83% | 256 | 11.09% | 102 | 5.65% | 52 | 53.26% | 490 | 2.17% | 20 | 920 | |
| Remove the option to moor and riverbank managed as open space | 44.21% | 416 | 7.76% | 73 | 4.99% | 47 | 41.55% | 391 | 1.49% | 14 | 941 | |
| Closure of all moorings at Mead Lane | 40.09% | 376 | 7.68% | 72 | 7.25% | 68 | 42.86% | 402 | 2.13% | 20 | 938 | |
| Are there any other options or issues you'd like to bring to our attention? | | | | | | | | | | | 416 | |
| | | | | | | | | | | | Answered | 1025 |
| | | | | | | | | | | | Skipped | 226 |

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

loss of wildlife, loss of views, stagnant water between the boats, rubbish

yes that over the past 2 years I've been unable to fish, I used to enjoy fishing at Mead Lane, it was relaxing but now boats are moored end to end. My family have been fishing there for over 50 years and it's sad that this area is now dominated by boats, which most of the time are boats that are not lived in or are undergoing improvements.

The dogs that wander freely! The drugs and abuse of residents.

Stabilisation of Mead Lane riverbank back in 2005. Women have gone topless on the boats whilst sunbathing and this is not fair for families that are walking by.

The riverbank is not strong enough to support permanent use of moorings and large vehicles belonging to the boat people. It was reinforced back in 2005 at great expense and is deteriorating due to constant moorings and vehicles parking on the entire riverbank.

If moorings are to remain it would be a good idea to install mooring bollards. The most sturdy thing to tie to are the trees which is not ideal.

I do not support any moorings for the reasons given previously, in addition to the fact the local council have not policed or enforced the mooring restrictions so far, so I have no faith in this happening moving forward.

I do not want moorings to switch to The Shallows or other local areas

Create a Local Nature Reserve in the area.

Conversion to nature reserve sounds like an excellent proposal

I would like to add my support to the wonderful proposal for a Local Nature Reserve at Mead lane, Salford.

As a local teacher I believe such a project would be of huge value to the education of the children of Salford or nearby villages. Due to the accessibility of Mead Lane for pedestrians it would be of exceptional benefit to Salford Primary School in particular, as well as to groups such as the Salford Brownies, Cubs and church youth groups who could easily walk there. I understand that there is the possibility of The Bristol Avon Sailing Club (BASC) in Mead Lane providing a classroom for school visits. This would directly overlook the riverbank from a raised position: what a fantastic opportunity for our children for real interactive, experiential learning!

For families from further afield, the proximity of cycle track would make it an interesting cycling destination for a day out, bringing extra custom to The Jolly Sailor and The Bird in Hand, where there are obviously toilet facilities for visitors. And what a wonderful opportunity it would be for disabled visitors. Vehicle access on Mead Lane could provide the disabled with a rare opportunity observe the plants, animals and bird species of this beautiful and somewhat unique environment due to the unusual factors of its location. For these visitors as well as school parties with vehicles, the carparks at the Jolly Sailor and the Bird in Hand could be used for parking if required. As someone with a disabled mother, I know how much she appreciates opportunities like these (Slimbridge is a case in point)I am delighted to learn that B&NES Council considers the River Avon a Site of Nature Conservation Interest.

Unfortunately, the implications of creating a Local Nature Reserve would be that, in order to protect the site, it would be necessary to ban any unauthorised mooring from this particular area. I understand, however, that out of 22 miles of the River Avon bank located within Bath and NE Somerset the area located at Mead Lane is unique: it is the only natural stretch where there are very few trees casting shade on one or both banks. Due to its south-easterly orientation, the shallow water is warmer than what is typical along the Avon increasing the range of local habitat and therefore diversity of animal and plant species it will sustain. Accordingly, the Mead Lane riverbank and adjoining river incorporate a combination of habitats recognised nationally as important for its ability to sustain specialist wildlife. For this reason, it would be an ideal location for a Local Nature Reserve and an area well worth protecting for the sake of the local environment, educational value and for the enjoyment of B&NES communities now and in the future.

Work done in 2005 is not compatible with mooring of boats

Seems counter productive to spend thousands on flood defences at Mead Lane to then agree to moorings which then undermine all that investment. Please stop wasting money. If you are serious about Climate emergency then ensuring that the flood defences are not undermined should be paramount.

The river bank and road are not designed for permanent house boat moorings and reportedly will fail over a short period of time.

The extent of the Moorings at the University Rowing Club. The public footpath/ towpath is now in the middle of the field whereas 30 yrs ago it ran along the riverbank. There were no static moorings and yet now they have hedges, chickens

In my opinion the moorings have not been managed during the 2018 trial or post trial in 2019 i.e. overstays, waste and litter from the moorings, traffic management and car parking on Mead Lane. As stated in my previous answers the mooring of boats bow to stern and 'rafted' two or three deep prevents access to the river for other users (canoeists, paddle boarders, swimmers, fishers

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

etc.) who then cannot physically access the river along the majority of Mead Lane, and if you are walking past you can hardly see the river. The bank cannot be accessed for sitting or having a picnic as it is blocked by mooring lines and parked vehicles for the moored boats. There have also been reports of antisocial behaviour by some individuals who have moored boats on Mead Lane.

There is also the issue of potential damage to the river bank from the moorings, which could lead to erosion and damage to the road. Mead Lane is the only access for the Residents, Bristol Avon Sailing Club, local businesses and the sewage treatment plant. The main sewer line for Saltford also runs along the road, if this is damaged this could cause serious pollution to the river and considerable inconvenience to the Saltford residents.

The area of Mead Lane would be very suitable as a nature reserve due to the access to the river for residents and visitors.

There are large number of moorings available in marinas along the river and local canal network, so there is no excuse shutting Mead Lane trial down immediately and allow the flora and fauna to recover this devastation reeked on it by the previous Banes administration. The previous administration allowed the mooring trial to take place, without due diligence, which included (conveniently?) ignoring the advice given by its own highways department, and expert reports during the major riverbank repairs which took place in 2005 at a substantial cost. These works were designed to protect the riverbank erosion which could during flood, result in serious damage, including the loss of the bank and the road. Mead Lane is a cul de sac, and is our only access, along with the hundreds of vehicles which every day travel to and from businesses, Wessex Water Treatment works and Laboratories at the Northern end of the lane. The removal of posts along the riverside to allow boat owners to park their vans and sometimes large trucks, which must have caused further damage to the banks.

Residents near river bank have been subjected to abuse and anti social behaviour from people on unauthorised moorings

We pay via our boat licence to moor for 14 days in any one place, or such longer period as is reasonable. It would need a change in the law to stop this. A river-only boat licence is mandatory if the boat meets the criteria, it is not a permit, it is a recognition of the Public Right to Navigate which includes the right to moor temporarily and in this case that means 14 days or longer. The Public Right to navigate has existed for many centuries and I expect it predates the houses being built along the lane or even the lane being built. You can't just remove that right, there would need to be a change in the law at Act of Parliament level.

The moving on of boats from Mead Lane has created an horrendous situation further down the river. The pontoon just past the cycle track is continuously full of wrecks and hills of boats lived on by river gypsies. It is a constant junkyard and people who pay for their license have no chance of staying on the pontoon. We negotiated with BWB for a pontoon for river users years ago and now it's purely used by those in junkyard vessels who contribute NOTHING.

Due to the amount of current moorings the area has become very untidy and I have notices a lot of the birds have disappeared .

The failings within BANES are detailed in our official complaint (presently on hold) together with additional information provided. The recent planning inquiry shows a compliant in 2016 before the trial started , but no other planning structure in place ,and no answers to our questions . This together with failings of the Water Space Study to identify the stabilisation works , and the dangers resulting from moored boats , just adds to the whole sorry story. On reviewing what has happened in Mead Lane it has been explained to me , if a panel of reasonable people viewed the evidence would they find it acceptable or fair .Uncontrolled , unplanned scheme to provide mooring in a green belt residential lane 8 meters from housing (FOI request shows 2016 housing act was taken into consideration) is bound to fail .

As with corporate organisations who make bad decisions , its not the decision but the cover up that catches them out, BANES has consistently suppressed any adverse news , we are still trying to find what happened to our 200 plus petition for example .

I tried going fishing there last month with my son. Having found the only available fishing swim due to boats within an hour of starting and baiting my swim a female with poor manners announced from her narrow boat sorry mate there's no where else for me to Moor and steamrollered her way in to Moor where we were trying to fish.

A local resident remonstrated with her and pointed out she was a frequent overstayer. He was met with a torrent of abuse.

Rather than have my son involved in this I simply packed up and left.

I found it very disappointing and the situation appears currently very poorly managed.

I think I fairness most boaters shouldn't be feathered with the same brush as those who choose not to use it In a socially acceptable way.there are fewer and fewer of nice safe places to moor, so please give us more bi services so those who leave their rubbish maybe inclined not to do so.

Parking nose to tail most of the year, and over night sleepers in vans usually that accompany a moored boat , this makes it very difficult for services ambulances fire engines ect to get down the lane . This is a problem in school holidays when teenagers swim in the river and get in to difficulties, had a few drown , the road needs to be clear for obvious reasons.

I am very concerned on hearing that any mooring at all has been allowed following the riverbank stabilisation scheme in 2005. The river level is often very high and any mooring would lead to scouring of the riverbank. pontoons to help avoid fishermen damaging the riverbank have been mistaken for mooring aids. The Waterside project is flawed in it's consideration of the river as opposed to the Canal stretch as potential mooring sites. The Technical, preservation of Natural Habitat concerns and Social impact of mooring in the Greenbelt aspects were obviously overlooked.

I think there are so few moorings for continuous cruisers along the River Avon, that these moorings are a vital pit-stop for liveaboard boaters, who bring income to the pubs and shops in the village.

I am concerned that bargee travellers are potentially being subjected to hate crimes by some of the villagers who live in Mead Lane, and if so, I think that that would be a matter for the police.

I am concerned that Mead Lane residents are using so-called environmental concerns as another reason to oppose the moorings. The recent appearance of 'no mooring' signs for both deer crossing and otter haul out are laughable, as the majority of deer in the area live in the fields behind the Mead Lane houses. As a keen otter watcher (and lifelong environmental campaigner), I can attest that they are easily able to access the river around boats - for example I regularly see otters further up the river where there are residential moorings and have even seen them scampering along the gunwales of moored boats! I think it is a shame that Saltford Environment Group and Mead Lane residents, are trying to imply that boating is anti-wildlife, when actually it seems they are trying to 'greenwash' NIMBY-ism.

It should also be noted that house residents have opposed boat moorings before they even existed, and have tried a number of tactics to have them removed.

Avon Lane has to be reinforced due to erosion, boat moorings increases erosion at the banks. Moorings therefore increases the annual maintenance burden for the council

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

We need many more safe places to moor for 14 days on the Avon. For example the new moorings at the old bus station site in Bath used to be 14 days and now they are only 1 or 2 days. These moorings MUST be re-instated to 14 days.

The prejudice from the local house residents towards boat dwellers is appalling and there is a need for education. Some of the conflict and prejudice is driven by poor vehicle parking arrangements, but boaters are a small proportion of the people who visit the river in vehicles and park at Mead Lane. Increased parking provision would help. There is a Public Right of Navigation (PRN) on all navigable rivers that dates back to Time Immemorial, this was first codified in the Magna Carta of 1215. The PRN includes the right to anchor or moor on river banks for a reasonable time without payment to the landowner. 'Reasonable' cannot be defined in advance but must be assessed according to the circumstances such as weather, water flow, fitness of crew, medical needs and needs of crew for rest and recuperation (see Moore v British Waterways [2013] EWCA Civ 73). In the context of the British Waterways Act 1995, a reasonable time is defined as 14 days or such longer period as is reasonable in the circumstances. Plenty of nature reserves have vehicle parking and boat mooring, for example both Poole Harbour and the Jurassic Coast (which is a World Heritage Site) have many places to park vehicles and boats are moored or anchored throughout these coastlines.

Why are 48 hour mooring on hanham weir not being controlled - the illegal boating community have been here for 2 months now and nothing has been done - NOTHING!!!

Moorings of boats in this location is not suitable due to additional erosion of the river banks and that it is not possible to leave the boats during periods of flood.

as an area of ONB and SSI it seems logical to turn the area into a nature reserve for the enjoyment of everybody instead

of a cluttered, littered up area for just a few

The fumes and smoke from these moored boats is polluting the air and can only be detrimental to the water life and other wildlife and humans.

The river should be available for ALL to see and enjoy. If somebody chooses to own a boat they should be responsible enough to have arranged a permanent mooring for it - preferably in a marina off the route of navigation. If they are cruising they should look ahead and arrange/book moorings in the way that people on touring holidays book in at hotels or B&B. If people choose to live on a boat then they should have first secured a permanent berth in a marina and pay rates like everyone else.

Introduce and develop the area as a local nature reserve to preserve the wild life, vegetation, invertebrates and river bank structure for generations to come to enjoy this unique location. Ensure BANES acts responsibly and fairly as a Council and follows its own procedures and guidelines which it has duty to do and avoided during the trial.

Please take account of the fact we (as boaters) have to cover a significant distance in the course of our cruising, to satisfy our license requirements. Ending the right to moor will make life considerably more difficult. Potentially rendering a number of boaters homeless, when their cruising license is revoked. :(

Why has this situation arisen, why were not local residents and the local community consulted before the " mooring changes " were introduced ?

A discreet waste/fresh water-point and chemical waste disposal.

There are not enough moorings on the River Avon for visiting boats, so more short stay visitor moorings are required.

A few are ruining the enjoyment of the many! And we pay!

I just find that all these surveys are well-meant but what do they lead to?

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

Spot Fines for people who litter, and damage no parking posts, verges, etc. Why is it always the law abiding council / tax payers that pick up the bill. Enforce what powers you have occasionally.

This area is free fishing - one of the few sites in the Bath area that you can drive to and fish without dragging your fishing tackle long distances before being able to fish. Years ago it was fairly easy to find a fishing spot but this is no longer the case because of all the boat moorings.

All boats should moor in a marina and not on the river. Due to a lack of parking availability the number of places available for anglers to fish the river has declined drastically so it is important that Mead Lane is kept accessible to anglers.

There are no proper facilities in place along that stretch of riverbank to ensure orderly mooring, The local parish council suggestion of a nature reserve would seem to offer the best way to ensure this space is kept safe for pedestrians and other (local and visitors) enjoying the riverside. There are plenty of more suitable places for mooring which have wider nearby roads. Greater freedom for boats to moor will also impact negatively on the sailing club, and potentially disrupt access to the businesses at the end of the lane. If mooring is made permanent the area will eventually be surrendered to boating, making local access along the river more hazardous and less pleasant. It would undoubtedly also take a heavy long term toll on local bird and animal life.

The mooring trial was the result of a FUNDAMENTALLY FLAWED process not because of the decision but because at that stage NO OTHER USE OF THE MEAD LANE RIVER-BANK WAS CONSIDERED AND EVALUATED. Relevant law was not considered nor any of the scrutiny that would have followed a planning application for change of use. Such a process would have brought to light the significance of the major engineering works in 2005 to stabilise the Mead Lane river-bank with its implications for moorings. This oversight was a major failure by B&NES Council at that time.

Some of the only "free" fishing in the Bath area.

n/a

Fully support Parish Council proposal to create Local Nature Reserve

Allow the Riverbank to recover and return to a safe have for the plant, animal life and the enjoyment of all residents and visitors.

When we first moved into the lane 22 years ago it was extremely quiet and peaceful during the week and very, very busy at weekends as the area was enjoyed by so many different people. They came to fish, to picnic, to cycle, to walk with their children on foot and in prams, some in wheelchairs and some just sat in their cars and watched the world go by, an oasis of calm.

As I came home from work, I would turn into the lane and whatever the day had held there was peace and I know I am extremely lucky to live where I did.

Now there is no calm oasis for anyone, during the height of the boating season, we are a boatyard, they fill the river with their boats and the lane and river-bank with their cars, frequently blocking the driveways of the houses.

The boaters see us as wealthy people with a NIMBY attitude. Nothing could be further from the truth; we are like any other section of the community and living with the constant abuse of the area has put a such strain on us and affected our well-being, the fumes from their diesel engines wafting into our gardens and worst still our homes. One neighbour living with early onset dementia should still be in her home, but an unprovoked verbal attack from a boater frightened her so much she was afraid to go into her home as she didn't want him to know where she lived. Sadly, the constant worry took its toll and she moved away only a few weeks ago.

I for one when returning home can feel myself getting anxious as I approach the lane, will I be able to get in my drive, what DIY will be going on my doorstep, will it be a nice boater or will it be

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

the one that called me an f....g c..t when I ask him if he would move his vehicle so I could get to my home, he was parked in the middle of the lane with no way past and there was no reason for him to be parked where he was.

I can best describe it as having someone parking their caravan on your doorstep and setting up camp on the pavement complete with washing line, BBQ, table and chairs, wheelbarrows, plants, firewood, boat engines, petrol cans and any rubbish they don't want on their boats, we are just 8 meters away from this.

I've seen boaters hack down the reeds so that they can access the bank, they've sawn branches of the trees where they want to moor, they tie up to the street furniture, and we are gradually losing more and more verge post which are there to warn motorists of the closeness of the verge and river beyond and not mooring posts.

Some boaters have absolutely no respect for the area, but I wouldn't put every boater in the same category. Unfortunately, the boaters that respect the area and stick to the mooring time limits and keep the river-bank uncluttered have become less and less and the overstayers have taken over, some boaters have commented that they will not be back.

We have become a dumping ground which sadly BANES has refused to control or monitor. At present we have four boats moored here, two are just parked with nobody on them, convenient and cheap mooring! One small cabin cruiser arrived on the 22nd, this boat was towed up the river and helped to moor against the river bank, he has no working engine. This river is now in flood and it is extremely foolhardy to moor here at all, but particularly with no power to keep yourself safe if needed, his boat could quite easily be washed onto the road, only last week the water was just 4cm away from bursting its banks.

The river is about everything that happens on it, only one thing happens here now and that's wall to wall boats, no ducks, no moorhens, no coots, no swans all of which nested and bred their young here for the public to enjoy.

A Local Nature Reserve will bring back the wildlife and the public that once enjoyed being here, it will preserve the structure of the river-bank and road. Continued mooring will undermine the river-bank lead to the erosion and collapse of the road. The discovery of the Environmental Study undertaken before the river-bank was reinforced in 2005/6 confirms that unless action is taken now there will be untold expense for both the Council and the businesses that operate here including Wessex Water (which handles all the sewage for Bath) and those businesses would have every right to sue B&NES as they have a duty of care to project the highway and they have failed.

Intimidation of Mead Lane residents from some boaters. Human effluent dropped in river, area totally unsuited as a boatyard

It has been suggested by Saltford Parish Council that this area be treated as a Local Nature Reserve. I wholeheartedly support this proposal.

Wessex Water are aware of, and share, concerns that the stabilisation works to the river bank along Mead Lane consisted of bio-engineering defences and they may not have been designed to accommodate mooring. Such use may have caused damage to both the rock armour, backfill and binding vegetation leading to a compromise in bank stability and an increased risk of failure. Mead Lane accommodates a strategic pumped 750mm sewer and is currently our principle access to the sewage treatment works serving Bath and Saltford. Wessex therefore urges BaNES to carefully review the bank stabilisation works undertaken in 2005 and their suitability for

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

continued mooring by river craft. We would support suggestions or other beneficial uses such as the proposals submitted by Saltford Environment Group.

The motoring trial has been a disaster with clearly documented degradation of wildlife and habitat. Opening moorings even as a trial requires management and controlling. It's like removing speed limits on a road and then asking locals to enforce them. It is in short, negligent and planning to fail.

Asking the local residents to have any involvement in the trial is ridiculous. It is of course the root cause of the now unavoidable conflicts - what were they thinking? One cannot introduce a new scene of this type and fail to invest in the management.

Management of the trial requires 24hour staffing which would mean three full time staff and the facilities to support them in eluding transport and accommodation. This needs to be funded. It is ridiculous and negligent to more that responsibility to residents.

Moorings require the facilities to safely and ethically dispose of waste both in terms of effluence and boat waste. It has been proved that this was not duly considered at the trial. This is again neglectful and therefore negligent. Boats have been recorded as overstaying their mooring limits by months. What happened to the human waste during this time? The boat hasn't moved. It is obvious that irresponsible boat owners have frequently discharged their human waste in to the River.

There was inadequate consultation with the local community regarding the trial. There has been no enforcement action take by BaNES. They started it and then walked away.

BaNES failed to do an environmental assessment of the impact of the trial.

BaNES failed their own Planning regulations in implementing the trial. Can you imagine building 14 houses in a place of natural beauty and not following any building regulations, planning and failing to plan for sewage and waste processing? That is what BaNES have done.

Importantly BaNES has demonstrated that they are incapable of managing the land that they own. They should immediately sell the land to a "Community Land Trust" to be set up by the community who will take responsibility for the wildlife and preservation of the land. If not BaNES needs to fund in excess of four hundred thousand pounds for the development of sustainable moorings for the boating community.

The study should note that BaNES has actively resisted and rejected provisions for Moorings closer to home. Specifically they rejected plans for a Marina close to Newbridge and they have restricted moorings elsewhere. They have simply moved the problem elsewhere and then systematically failed to actively management it.

This issue is of BaNES making and they must return this to the condition it was including remedial work to repair the damage done by the trial.

There is a VERY significant safety risk to be considered too. This part of the river takes a life on average once every other year. This has been documented. The river forms part of the Bath flood defences and floods most years sometimes to very dangerous levels. It's only a matter of time before lives are lost and I'd like to put this on record. I have evidence of this life lost going back 100 years. Please do not ignore this statement and warning. The river looks placid but is far from

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

it.

Lastly; the behaviour of a minority of boat owners has been a disgrace. The boating community has failed to be good neighbours and must accept and take responsibility for that. Parties, music, drug taking and trading in a quiet country location is bound to cause issues.

Our parish council has submitted a proposal that the Mead Lane riverbank becomes a nature reserve. I fully support their submission to the council. B&NES declared a Climate Emergency earlier this year and we know that re-wilding areas and supporting flora and fauna and nature to thrive has a role to play in tackling climate and ecosystem collapse. A nature reserve allows us to re-connect with nature. And when we reconnect we realise we have a part to play in preserving nature. It raises our awareness about the fragility of nature and our eco-systems. Nature reserves require volunteers to manage and support the amenity. There can be nature education and outreach opportunities. There can be monitoring of the flora and fauna which can involve the entire community and can introduce nature to our children and young people. Saltford School and other Saltford associations can support and link with the amenities of the reserve. Never has there been a more urgent time to re-wild and the in nature. We know the proven benefits for our physical, mental and spiritual wellbeing. In the next decades we will all be severely challenged by the impacts of climate change. Building resilience in communities will be key to our survival. A nature reserve in Saltford that embraces river, river bank can become a resource in building resilience.

Such a shame that moorings, residents and wildlife can't all share the space happily

No

Any future moorings will bring more damage and erosion to the riverbank which will inevitably reduce the number and possibly eradicate the many species of birds, mammals and insects which inhabit this very special location.

no

Yes if managed as natural open space for nature will the sailing club be stop and youths out on the powerboats in the summer?

I am definitely in favour of the proposal to create a Local Nature Reserve.

If there was a possible means of reducing road traffic that would be a positive move

There should be more areas available for entry or exit from the river for those wanted to use the river on a canoe

The vehicles illegally parked never get tickets on them

Over the last couple of years boats and litter have detracted from the appearance of the area. Whilst most boat owners are very responsible, unfortunately not all of them are. There are no facilities as far as I am aware to make this a suitable mooring location (waste disposal) leading to a cluttered appearance. Also I gather from the Saltford Environment Group that the riverside condition makes it unstable and unsuitable for mooring.

I'd prefer the moorings to be for a fewer number of craft transmitting along the river rather than more long term parking of many craft as it seems to be now.

Nice to have a balance between nature and managed space

No

Access only for residents. No barbecues, especially dry conditions.

We need to increase wildlife

Moorings are available a little further upstream. We must allow wildlife to have a space of its own.

There are no facilities for boats to moor for longer than 48 hours

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

Unless BaNES have the resources to provide policing of any restrictions of the moorings, then it is not practical to allow moorings in this area.

It is a health hazard when moorers empty their toilets into the river, clog up litter bins provided for day trippers and park on the verges.

Therefore, resources are needed for providing services for the boaters such as parking away from Mead Lane, water, waste/rubbish/Elsan disposable close to the mooring.

I frequently push a wheelchair along Mead Lane and feel in danger when negotiating the vehicles, rubbish, dogs and parked cars

A recently discovered letter regarding design and environmental reports for the 2005 stabilisation of the riverbank at Mead Lane. that stabilised the road, stated that the repaired road was not suitable for moorings and that subsequent damage may already be occurring.

Plans for a new bridge over the River Avon linking its sewage treatment plant at Saltford with the A431 on the edge of Swineford have been rejected on "environmental grounds", but a "Nature Reserve" does not warrant protection from encroachment by moored dwellings, dumped refuse and untreated sewage

I understand large Government Grants were obtained to stabilise the road and also to enhance its status as a nature reserve. If mooring is permitted then this will remove protecting a nature reserve as grounds for any Grant to be made to repair the road possibly caused by the continued mooring of large vessels. Leaving the full bill to be paid by the local authority.

This was, until recently a very pleasant and peaceful place to walk. I was shocked on my last visit to see how it had deteriorated. The verges had not been cut, there was rubbish everywhere and there were numerous scruffy narrow boats moored along the whole river. These were not the normal holiday boats that used to moor there occasionally. I have not visited since as the whole place felt very unwelcoming.

I have not witnessed any of the anti social behaviour incidents by some of the people who have moored their boats on the riverbank but have been told about them by those who have. This behaviour may be exhibited by a few people and leads to disruption in the village community. A fair solution needs to be found so that the frequency of incidents is reduced or they cease. I am very concerned that people mooring boats also own or rent additional vehicles which they are parking on Mead Lane. Additional vehicles parked on Mead Lane causes disruption to traffic flow.

It's clear that any options for mooring will be abused and therefore the only sensible option is to remove them entirely so any policing is straightforward.

shorter moorings are disruptive to family life

Yes .I am concerned as to how waste etc. is removed by boat dwellers as the suspicion is that this is simply dumped into the river thereby causing pollution and potential health problems.

Proposed bridge to provide alternative access to Jolly Sailor Pub and Wessex Water.

Consider alternative access to Jolly Sailor Pub and Wessex Water Depot.

With the popularity of wild swimming on the increase, the removal of boats from mead lane could leave the location open to a huge swathe of swimmers and revellers much like what has happened to warleigh weir. I believe this would be detrimental to wildlife, generate huge amounts of litter and the associated cost. Not to mention noise and the potential for antisocial behaviour from people with nothing to lose. Mead Lane is a very important spot to many boaters who for the most part are very respectful and really do look after the location.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

For people using the moorings it should be made clear that nothing should be stored/parked/dumped on the riverbank. This would keep the bank tidy and safe for wildlife and residents alike.

no

The Mead Lane floods when there's heavy rain and the river bursts its banks. Better drainage in the section would be appreciated. The area is a haven for wild life and the view should be protected for the benefit of the local residents like myself who visit the area through the whole year not just the summer months. It is an area of outstanding natural beauty and I hate to see this blighted by the craft mooring along the bank here. There is plenty of mooring space provided along the banks of the river prior to reaching the Mead Lane section.

The lack of affordable housing is an issue. Keeping opportunities for lower cost living is essential for all communities. Some permanent moorings should be made available.

Only, one or two night holiday moorings, as it appeared, used to be. years ago

The "New Age Travellers" who often wrecked our Green Lanes in the 1980s and 1990s have now largely moved onto our canal and river networks where enforcement of the relevant rules and regulations seems to be virtually non-existent.

Limit boat stays to say 4 boats at any one time between the Yacht Club and the Mead / Avon Lane junction.

The riverbank habitat is being bespoiled and will eventually be destroyed by the presence of the moorings, inevitably exacerbated by those users of the moorings who simply do not wish, or do not know how, to behave in an acceptable and non-intrusive and benign manner.

Designated parking

I truly believe that the river running through Saltford should be there for all to enjoy - 48hr moorings dotted along have never caused an issue but the river bank is becoming increasingly congested with boats & the people with 14 day moorings staying MUCH longer, who then are claiming the riverbank by their mooring as their own personal private garden, wanting to live on the water but not treating the river or the bank with respect.

People have a right to live wherever possible, however it's the mess that is created and left behind that's the issue

Would be good to have safe places to enter or exit the river... sometimes boats block these at Saltford shallows.

48 hour mooring only

Saltford Parish Council, trying to make it a nature reserve, which will greatly restrict activities in the area.

Restriction on speed of cars

Moorings for day trippers is fine if enforced

I am aware of the growing numbers of boats mooring and flouting regulations. Also there is an escalating risk of severe anti-social behaviour and someone or someone's property will be involved. Police, Courts, Insurers, Hospitals/Doctors, MP's the list is endless of knock-on effect of inadequate regulations.

Large number of day trippers in summer - lots of traffic, noise and rubbish.

I support Saltford Parish Council in their efforts to protect Saltford's wildlife and riverbank with their proposal for a local nature reserve

I would like the moorings to be more available to day trippers and 1/2 day stays, so more people can enjoy Saltford's facilities, activities and beauty.

These kind of what appears to be long-term residential moorings should be accommodated the other side of the Marina. The banks looked as if they were heavily trodden and there was no sign of the usual wild life, ducks and swans, we always look out for. A swan taking off in flight is a wonderful experience to witness.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

NO THANK YOU

This is a residential area not suitable for house boats

Boaters need to be monitored to keep to the 48hr/14day period to minimise overstayers. This allows more people to enjoy the area and reduce issues with local residents

Riverbank should be made into a Local Nature Reserve

Who is accountable for the original decision to recommend allowing 48 hour and 14 day moorings at this location and what were the plans to monitor the situation? The answer, I imagine, is that they wish to remain anonymous and didn't think of that.

The result is there for all to see.

I strongly support Saltford Parish Council in their efforts to protect Saltford's wildlife and riverbank with their proposal for a Local Nature Reserve

It would be good if narrow boat holiday makers were able to moor for a day or two while travelling. At the moment they are turning away as there is no space because of permanently moored boats.

If there is a decision to allow 14 day (or longer) moorings then toilets and other facilities need to be provided. Not sure who would pay for those. At the moment some rubbish and human waste appear to be being put directly into the river.

I understand that some of the current boaters moor there for a long time as they cannot afford to stay in the local marinas and would otherwise be homeless. Could there be some 'affordable' or 'social' moorings provided by council subsidy in local marinas? These would be available e.g. to boaters with families so that their children can attend school regularly.

Keep some short term moorings but don't allow parking of vehicles on the road.

The trial has clearly demonstrated that Mead Lane, as a hitherto unspoilt beauty spot in the green belt and in close proximity to residential housing, is unsuitable and impracticable for moorings which require continual management. In order to protect the riverbank for the majority of visitors, most of whom would not be aware or in a position to respond to this consultation, and residents who all value this important and iconic location, a mooring ban should be implemented without delay, commencing with an immediate winter mooring ban.

Fishermen who can no longer fish on mead lane because of the moorings have now been forced to fish in the shallows. This is causing conflict between them and other visitors. Picnics canoes, swimmers etc.

Our trips to the Jolly sailor have reduced dramatically since the walk there is no longer as enjoyable.

Since the mead lane moorings we have seen an increase in boats mooring in other non allocated spots. Under the bridge, shallows.

Traffic calming

Whatever is put in place must be enforceable and enforced.

Is it not possible to have a "no mooring between 10am and 2pm"? It would allow touring boaters to stop for the night, visit the village, have a meal etc and encourage those who use their boat as a floating home to find a more permanent mooring.

Parking and increase of rubbish are issues.

Traffic is liable to go too fast down the lane

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

Regarding option 4 above (fewer moorings and riverbank managed as open space), the answer can be misconstrued. My answer should not be taken as being that I support more moorings: I support no moorings, at all.

The number of moorings has grown and the river bank is being spoilt for the residents of Saltford and visitors who have enjoyed this pleasant view of the countryside for generations.

Anglers have been forced out of this location. Former bank access used and maintained by anglers has been completely overtaken

Having the area of natural beauty that is managed for wildlife would be great! Often rubbish left and busy moorings obviously hinder this and so less moorings and better management of the area would be great

If moorings are removed here there will be even more of a problem with illegal moorings in even more unsuitable locations, e.g. upstream of The Riverside pub where the river bank and path are destroyed, litter is left in the shrubbery, and the footpath is covered with clutter

There are some boaters who do not keep to the 14 day rule and this is frustrating for those who are genuinely navigating the river system by the continuously cruising code. There are problems there sometimes with rubbish being left and noise, in my experience this has been daytime people going there with inflatables and barbecues rather than those who live on the boats

Just allow a few 48 hour moorings for genuine boating holiday users

Much of the rubbish and traffic is caused by day trippers. When I have moored at this spot I have come back from a weekend away and collected beer bottles and rubbish to make sure it is disposed of properly. I have also confronted youth who have been treating the local area with disrespect and told them I would call the police. The boaters are mostly good, upstanding citizens and it feels as though we are being unfairly held responsible for the residence of Mead Lane not wanting any of the public to share this place of beauty with them.

It would be against the law to stop boats mooring anywhere on the river, we have a right of navigation which we pay for through boat licence and this includes mooring for 14 days in any one place or such longer period as is reasonable in circumstances. Also, it seems press coverage quotes local residents as saying that the problems at Mead Lane have arisen as the result of the mooring trial. This is categorically not true. The local residents were complaining about boaters overstaying, etc etc before the mooring trial started and were trying to get rid of us for many years before that date. If anything the mooring trial has improved matters and encouraged boaters not to overstay due to the area being signed as 14 days and word of enforcement and how careful we need to be to avoid upsetting the hair-trigger reactions of the residents. I believe overstaying at Mead Lane has greatly reduced since the trial started, with a small minority of boats overstaying with no good reason. Some of those that have overstayed have done because of good reasons such as flooding, river conditions, illness, injury, boat breakdown and other likewise emergencies. This is what boaters are able to do according to the 1995 waterways act.

Any rules re parking, mooring etc are being ignored. Who is responsible for enforcing these?

live and let live, not totally against the moorings its just the sheer number of them they take up the entire length, impossible to fish there recently

The general mess of extra vehicles, push bikes and other paraphernalia is an eyesore along the riverbank. The general disregard for the village and its way of life is also upsetting when in other areas of the village and this is always exacerbated in the summer months when moorings are worse. If they want to live in Saltford then respect our way of life and don't pick fights with us in local pubs and other amenities

Remove all parking (double yellow lines) and let families enjoy the space and open water as a shared space for limited fishing and paddleboarding. Some minor lighting might help make it safer or white line painted on the road so people can walk up and down without cars brushing past especially on a Sunday afternoon

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

If you can stop this damage to the banks it would help.

Enforce the existing rules. You manage to do it with cars. What is the point of putting up signs if you don't enforce them

Could wildflowers be planted along Mead Lane

I think that the boats should only stay for at the most a couple of days and be charged. Also only let the tidy boats be able to moor as there are many tatty ones there at the moment and it is just spoiling the views for everyone.

I don't understand the difference between the last two

Better provision for rubbish collection, water points and chemical toilet emptying points for the people on the boats.

something needs to be done to bridge the gap between boaters and residents...seems like there is misunderstanding from both sides.

This part of the river in Saltford is one of the few owned by B&NES, most are privately owned and visiting boats are charged to use the site. If we have to suffer this effect on our environment at least make them pay a high cost for what we have lost. The current situation makes it an attractive mooring site. Free and with road access.

The boats occupying this area have completely changed this area. The area is now ruined.

I believe that the area should be managed as a natural area to be enjoyed by all.

The rubbish and mess on the banks and no more duck swans and moorhen since all these boats moved in

I was born on Mead Lane and have lived here all my life. I've watched the slow destruction of the riverbank. I now feel less safe along the area. Lots of the boats are very very shabby with no licences to be seen!! Most are not the pretty canal barges for holidays we used to see and enjoy!!

NO

I often go to Mead Lane several times a week and have always found the live aboard people friendly and quiet. All the music I have heard is from both pubs when they have live bands. The broken billiards are due to rot! As for rubbish it is caused by people who come to picnic and leave their rubbish behind. Emergency have plenty of room as I have seen a fire engine pass without problems also the water companies lorry and the bin lorry. I was also a Paramedic for 26 years and it's parking in residential areas that cause problems to the emergency services. I strongly believe the so called issue with the boats is due to the few people who live in £1,000,000 homes and hate to think someone can have the same view as them for free! It's all down to snobbery and I believe if moorings were banned that this could be illegal as it is clearly aimed at a minority of law abiding people. This discrimination must be nipped in the bud

None

I have heard that this river front could become a nature reserve. Closure of moorings would mean simple supervision to ensure compliance.

Explain to the residents that mooring arrangements are made between the individual and CaRT, depending on circumstance, and they have no right to involve themselves.

All boats that are illegally moored should have their licence revoked. Better signage to inform users that mooring is not permitted on the left hand bank going downstream from Newbridge to Saltford.

Need space to sit down for picnic. Currently, we sit on the road grass bank (more on the road than on the bank),

Let's be quite certain about this the moorings are people that have no regard for the area I have noted that they frequently overstay which begs the question of sanitary disposal and ordinary household waste which I notice local bins overflowing with waste, there is ample mooring but they wouldn't be interested, these people are one way there way, and ruin others enjoyment, fishing, walking, and sailing.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

The only viable option is to remove the existing boats and remove the option to moor in this area. To allow restricted mooring would be impossible to monitor and would be extremely expensive for the Council to attempt to achieve. There are other mooring options available for boaters along the length of the river. The motivation to moor in this area is that it is free and cars can be parked on the verge. This is to the detriment to the area and the facilities it provides for the general public.

We don't visit the area so often because of the unsavoury types that seem to be there. My children and I noticed dogs roaming on the river bank, where we used to sit and I could smell the distinctive aroma of drugs.

A disabled mooring

My wife was threatened and abused by several residents while she unloaded shopping from our car which is then parked elsewhere. Contacting the police non emergency number we were told they were unable to attend.

The public right of navigation applicable on all navigable rivers includes the right to moor for a reasonable time, as we are on Canal and River Trust waters this is 14 days and longer if this is reasonable in the circumstances. This is a historic right that pre-dates most of Saltford including the houses at Mead Lane by hundreds of years. So there is NO WAY that mooring can be banned, at Mead Lane or anywhere else.

The river should be accessible to all users and this is not possible with long canal boats blocking access. I have also noticed a larger amount of debris and grease/oil floating whilst using the river. I have seen people damaging trees and river bank who belong to the long stay boats.

There could be more bins, including on the street recycling bins. The bins that exist need emptying more regularly, particularly on summer weekends.

Keeping a special beauty spot for everyone is essential for all our health and wellbeing.

If mooring is to continue, needs to be less turnover of boats and possibly some form of CCTV to monitor any potential anti social behaviour, littering and ensure general wellbeing of the environment as well as consideration for nearby residents.

These moorings are crucial to navigation of the river as there are very few places to moor. If these moorings were taken away it would leave boaters having to moor in dangerous places with little access to parking. If one purchases a property next to a waterway one should expect boats to be moored there. Harassment and aggression towards boaters from local house dwellers need to stop. When we moored there a lady came out of her house and shouted at us in front of our children, it was in relation to our car which was parked perfectly legally. We found the experience very upsetting.

My husband and I moor at Mead Lane occasionally, approximately once every three months throughout the summer aboard our boat and over winter not at all. The latest we have stayed in the year is one November around firework night for 14 days when the weather was bad and river was in flood on our way to Bristol.

It is an important stopping point when we travel as there are very few places to stop between Bath and Bristol for 14 days. When boats are homes on the move, places for longer stays are essential, to rest and recuperate. It is physically tiring to man a boat continuously and unavoidable that problems do occur from which one needs respite. This is especially true for those coming from farther afield. I'm deeply concerned that there are becoming fewer and fewer safe places to moor for more than 48 hours between Bristol and Bath generally and this is leading to dangerous and reckless behaviour I've witnessed by boaters on the water. Safe places to moor for more than a week in these areas have been greatly reduced in the past 10 years.

Some boaters make dangerous decisions out of desperation to stop moving and some do it because they feel forced to move on before they are ready.

Going by press photos I have seen, Mead lane would benefit from the following rules: No generators after 6pm and no project work to be carried out on boats *at all.* No belongings to be placed on the riverbank without exception at any time. This would keep the aesthetic of the area which is important.

When my husband and I have moored at mead lane in the past we observe these rules. We have however picked up on outright hostility from residents there. The last time we visited, we stayed for a week but the atmosphere was such that we felt so uncomfortable we didn't want to continue our stay. Residents parked their cars in an antisocial manner, unnecessarily close and parallel to our windows on the road. I think residents also parked in a way to attempt to stop boaters with vehicles bringing them into the lane which was unpleasant to witness. One resident made a point of making us aware they monitored our coming and going (on foot and bike) from our boat. This was not done verbally but by crossing arms and scowling at us when we walked the lane to the pub.

We acknowledged a resident in the lane by saying "hello!" while walking and they scowled, looked disgusted and tutted.

It became apparent one resident has a family member in the police force. While we stayed we got the distinct impression this person was coming around in a police car, with intent to intimidate boater owners using their presence as a deterrent. This family member would sit in the police car on the roadside visiting at intervals throughout the day and very rarely visiting the house of the family he was connected with.

I actually had a mind to report this to the police at the time when I witnessed it(!) as it was unmistakable what was happening and I considered it quite shockingly unprofessional.

In one day on more than three occasions when I was home I felt I was being watched along with other boaters by this policeman and family member from a police car. My husband and I were not targeted as individuals in anyway but I imagine considered lumped in as part of a wider problem seen as a whole, even though we had little to nothing to do with existing boaters who were also on mead lane at the time.

These incidents were two years ago.

My opinion is that occasional visitors like ourselves to the moorings are put off by resident behaviour and those that stay there harden to residents and so an anti social cycle exists at Mead lane. I do not think one party is to blame but it is a really very sad situation.

I also feel this is a relatively new development that has become a problem only within the last 10 years. Perhaps the residents on mead lane did not realise what buying a riverside property would mean or that a navigable waterway and public lane would be used by boats and walkers.

I would like to raise the question where is the support for the protection of moorings and an increase in pontoon moorings on the river so boaters can remain safe in the winter when the river rises and why are residents in houses allowed to feel that they own this stretch of river? The charity CRT holds in trust these valuable resources and needs to realise that continuous cruisers should be viewed with as much respect as the wildlife and the plants that the river supports. Some work needs to be done to bridge the gap between people who love this beautiful space in different ways. The ccers I know personally that moor at Mead Lane are extremely respectful and

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

decent people. If a neighbour plays music too loud or some other issue, you would just knock on the door or mention next time. If it is more antisocial then the usual avenues are taken. None of those have been reported, I am concerned the residents at Mead Lane do not justify real complaints in the normal way. What complaints do they have? Surely a meeting where their concerns were met with some education about being a ccer would go some way to alleviate their complaints. I would also be very interested in hearing from their own mouths what is troubling them. It is not fair to not consider the limited amount of mooring options especially in the winter when the river is high when considering this case. It is not good enough to just say 'move on'. These people have chosen to live on a boat and do not move because its cheaper, they move and live on a boat because they adore being as close to the river and nature and being a close community. This brings with it some inconveniences and they still prefer it. People who live at Mead Lane do not get to choose who can moor on the river and CRT should be doing everything they can to protect the boater's way of life. When we've all been pushed off the last mooring, the canals will be dead, blindsided with towering apartments and pedestrian spaces. And then they'll start selling space off for the river side apartments, you have no right.

Because the grassed area along Mead Lane is quite narrow, It's not suitable when people moor up and have bikes, chairs, bbq's etc... strewn across the grass bank, dogs pooping and wandering freely, under no supervision and their owners smoking illegal substances.

What was once a place of tranquility, where we used to stop, sit on the bank and enjoy a sandwich, is being spoilt by a small minority, who seem to think they can do as they please.

If the stopping time was no more than 4-6 hours, I think this would encourage those that would like to enjoy the area and a meal at the local pub, but not those that just think it's ok to make a nuisance of themselves. The residents must be heartbroken to see how their beautiful riverside vista is being spoiled.

difficulty in finding moorings anywhere locally - we've been on the waiting list for Saltford marina for years

The nature of British rivers is that they are working environments, and those who choose to purchase property near a river would have been made aware of this in their survey. The rivers was there and working for a long time before any of these people moved to the area.

Get the crt to manage overstayers so that everyone who pays their licence get a fair usage.

Dong shut it down because the crt are not doing their job and managing overstayers in tatty dwellings who are annoying the house dwelling residents which is really the foundation of this excercise .

Also local businesses will possibly cease .

Also I pay my river liscence for not a lot apart from that stretch of water way at most twice a year I kayak and it would be great if the ramp was put in at the Shallows as shown in the Waterspace study. Also Shallows more suited to a nature reserve than mead lane

More easy usage of locks eg electronic locks or access to the water after the bath side lock so that part of the river can be more easily used

If moorings were removed partially or fully, the bank would not be managed, but would become overgrown and clogged with litter either brought in on the river water or by the wind. Boaters help control the banks and generally depart with rubbish that is in the vicinity.

It is unfair and out of order for the very people who detest boaters to be recording information and monitor moorings. All informations put forward should be NULL and VOID. There has been

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

examples where residents have been abusive towards boaters, have over exaggerated claims as well as setting boaters up, (eg - placing their own rubbish outside boaters home and photographing it) by no means are some residents innocent in this situation, and have gone out of their way to intentionally exasperate things.

A major issue that has caused problems is that CRT, the environment agency or BANES do not monitor the moorings, this has left Mead lane open to abuse to a minority of boaters who think they are not on the radar anymore. (it should also be noted the CRT have contributed to this problem by constantly changing the rules and forcing people to move further or have their licences taken away) I am not saying there has been no issues, I agree that antisocial behaviour should be dealt with (same for residents antisocial behaviour)

This is deeply unfair to law abiding respectable boaters who operate within the rules (a vast majority) As a result of the lack of monitoring by an official party, a great deal of tension has built up between both parties.

The solution to this problem is to have an official authority to monitor the moorings like the canal is monitored.

Its important to remind anti boater home owners, that the river was here long before their homes were built. Perhaps they should move to a place that is more suited to their bigoted views. This includes not moving next to a pub if they do not like the noise from a pub and not near an airport if they do not like planes. Having an expensive home does not give people the right to dictate who does and does not lives near their homes.

Some Mead lane residents are people who have made a judgement on how boaters live their life. Stereotypes include boaters not having jobs, throwing human waste in the river and being thieves. The boating community include a diverse range of people from all backgrounds, rich and poor. Teachers, nurses, engineers, librarians, care workers, artists, craftspeople are just a few of the people who live on their boats.

Another issue that isnt taken into account, Saltford is commonly known as saltford beach and is a very popular spot for all, dog walkers, swimmers, kayakers and paddle boarders, fishermen, walkers, families, it is well known the summer is busy here. it always has been. People come from miles around to swim here, drink in the pubs, walk their dogs etc. Some of the issues encountered by locals are not boater related, but related to a whole selection of visitors, rubbish, cars, dog fouling etc

The solution to this is not to stop boaters mooring here. If legal mooring is stopped, law abiding boaters will not come and the problem will be made worse by the minority who dont give a damn and cause more problems.

It is noted that this survey sways in favour of residents, yet again another tactic to get rid of boaters.

If you remove moorings here, how will you police it and where will the increasing numbers of boaters go? We need more moorings, not less. The Canal and River Trust are forcing boaters to go further over the year, and rental properties are getting more expensive and competitive in Bath and Bristol.

Far more official visitor moorings need to be made available to boaters between Bristol and Bath.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

As boaters we face enough hurdles and persecution without having to be kicked off another mooring because people don't like us. Actually most boaters are just normal people trying to get on in life. We are a young couple who live on our boat both for life style and also financial reasons. We both run our own businesses and without financial support from others have not yet managed to make our way onto the property ladder. We are respectful of and love the waterways we live on. It feels a great shame to do away with these moorings purely based on the actions of such a small number of people - residents and boaters a like.

No

Removing moorings makes it increasingly more difficult for people to live a traditional and legitimate way of life that should be protected as a national heritage.

Please designate the banks as a Local Nature Reserve

The residents clearly need educating as to boaters way of life as I have witnessed the behaviour on more than one occasion. Abuse is abuse and a boating family with young children should not have to live in fear of being harassed and verbally abused.

How about pulling down the houses. Boats have been mooring there longer than they've been built

A rather abrupt nimbby attitude much like people who buy a house next to a pub then protest for it to be closed down.

As a live aboard boater there are pressures from multiple directions that make life harder, I have suffered verbal abuse, logistics are complicated, parking can be very difficult, the Canal and River trust can be troublesome to deal with and so on. I feel that the council should be actively supporting the boating community rather than being another organisation making our lives more difficult.

This is a canal and its heritage should be supported. It's the boats and boaters that ensure its continuity - not housing developments. Canals are for boating!!!!

The issue of anti social behaviour is a real one. The boaters in question have also been seen on the bitton pontoons for up to 6 months. Meaning I can't visit there either for fear of abuse. These beautiful spots are being turned into no go areas for me, and anyone else who speaks up. It's bullying behaviour and needs to be stopped, not downplayed. I'd like to feel safe to visit these areas

Around 6 specific short-term moorings (24 or 48 hour) for visitors that are monitored and enforced. The rest to best nature reserve. No long-term (14 days)

General friendliness if boats.

It would be a shame to remove the moorings, it's a good temporary spot, there is good interaction between boaters, the public, paddleboarders, kayacks & sailing boats. It brings a nice atmosphere & everyone I've encountered has been pleasant. It should be monitored, not removed.

The community on the water is part of what makes the area special and safe, they are friendly kind people mostly who just want a quiet life.

I think the moorings are fine just needs to be better managed by the council and with better facilities. The failure comes from council mismanagement yet residents are blaming and stigmatising the boaters

Boat owners have no facilities and I have witnessed them going to toilet in the river, holding parties on the bank and parking vehicles so badly that the Wessex water lorries can not get though.

more action by CRT

There are very few places to moor on the River Avon. 48 hour moorings are no good to liveaboard boaters who work or who have other daily commitments. The majority of continuous cruisers adhere to the timescales on the moorings and do not litter, they take their refuse with them and dispose at relevant sites. The bad parking and litter that I have personally witnessed along that stretch has been due to daytrippers, painting clubs, fishermen etc, not the boaters who

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

respect the environment that they live in.

The local residents have harassed and intimidated me personally and made me feel very uncomfortable whilst moored there. They have been seen placing rubbish by the boats and taking photographs that imply it is caused by the boaters. Someone recently had their car (which was legally parked in the the layby) sabotaged. It is getting out of hand, how can they choose to live by the river and despise boaters and boats so much?!

The boating community provide a draw to the canal.

If this was properly monitored with 48 hour moorings and enforced this would solve many problems.

If people moor for periods longer than 48 hours, there are no facilities for them, water, sewage etc. If they are not just passing by and mooring for 48 hours they are in fact living there including parking their vehicles on the river bank, making Mead Lane a dangerous place for walkers, cyclists and fishermen, they are destroying the bank, damaging the trees and frightening away the wildlife.

The people on the river give so much to the community, one even dived in and rescued my dog who got caught in brambles, I love the diverse life they bring and enjoy meeting them

The boats add to the area and I've always found the boaters friendly.

Mead lane is a beautiful location that should be shared by everyone. I think it is extremely unfair for boaters to not be allowed to Moore there. We as boaters are very respectful to our surroundings and have a great caring and understanding to nature. If mead lane really was to become a nature reserve then surely there must be a ban for motorised verchiles and change only access to foot and bicycle. The residents would have to be relocated and trees replace their houses. I believe that fishermen are Moore of a threat to nature than boaters, their line snag and are left in the river , they hurt the fish , birds , water volws and otters.

Is it just a case of enforcing the rules to make sure that boaters don't outstay their welcome? Similar to the picnic spot by Bitton railway which used to be a lovely spot on a weekend. And now has had the same boats moored there for month stopping others in the community from enjoying it. Now they've been left for so long that there will be uproar which ever way it goes.

The problem is that we have had to put up with serious threats of violence from boaters, which have been reported to the Police but told they have not been able to trace them. This is very worrying and upsetting! Since the boaters have been mooring here there has been virtually no compliance with the mooring rules and vans with people sleeping in them either known to boaters or because word has got around that no one will stop them. The vans have no toilet facilities so they openly use the riverbank as their toilet. It is not nice for families with young children that like to sit on the riverbank to sit near or on where they have been defacating. Also the boaters have dogs which they allow to freely roam up and down the road and enter mine and other residents property to foul. The other issue is safety as there are no street lights and the boaters leave their chairs, tables, bbq's, bikes etc on the riverbank and the many people that walk up from the pub in the dark are in danger of falling over these things causing harm to themselves. The wildlife has virtually gone since the boaters have been here.

Some local residents have been rather unpleasant. Perhaps some kind of signage or local letter distribution to remind residents that while considerate, tidy and respectful use of the mooring facilities is obviously essential, the river there is a wonderful shared resource, they don't own it and that being unpleasant to river users isn't appropriate.

No

You can only have 48 hour moorings if it's enforced by daily visits.

I support the creation of a Local Nature Reserve at Mead Lane

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

Boats moored further along river (stretch between the Globe and Saltford Marina) are causing bigger issue. Most stay months at a time and have dogs which are left unattended to roam the footpath. This has resulted in a dramatic rise in the amount of dog poo over the path. Now boats leaving it's already improving but we saw dogs from the boats pooing on path lots of times over the summer. Also we saw boat owners taking gate to Marina off it's hinges and leaving it so they could get their pram through, since left and not repaired gate. Also many boats have had fires on the riverbank leaving lots of burnt destroyed patches. I walk on the path every single day and can assure you it is the majority who do not respect others or the environment not the minority. One last thing there are two dumped boats moored here, one being there at least a year now, last week 3 drug addicts were using it to take Heroin on.

There is hardly any mooring on the river that is easily accessible and safe. Closing the main mooring spot is short sighted and will put boaters at risk.

Fly tipping by local residents

It would make Saltford and it's councillors a target for boaters and those living alternatively if you displace them from their homes, I would not recommend targetting boaters rather than the CRT who are chasing the boaters around in the first place.

SCRAP ALL MOORINGS FOR EVERYONE

My friend was verbally abused by a fisher man there for scaring the fish by mooring and called a c**t whilst she was with her youngchild

There are members of the public who visit Mead Lane and surrounding riverbanks to see the boats, however, this is rarely mentioned in comparison to complaints.

The trial has shown that the 48hr and 14 day mooring rules are mostly ignored. Those who do ignore them also create additional problems for Mead Lane users by parking vans and cars and reducing the usable width of the river.

I have seen used building materials, timber, etc, dumped by a resident

I am very concerned about the feeling of social cleansing going on here... what is wrong with the traditional narrow boats using the very waters they are meant for? I am shocked by what I have seen the residents do towards the boaters.

The issues caused on mead lane are generally not from residential boaters (i.e. rubbish and parking) but from day trippers. The boaters are blamed when not at fault.

Recently a fisherman used an incredibly strong swearword at me, unprovoked, in front of my 19 month old son, as he thought we had been there for 3 days, when we had been there for 16 hours, and politely told him as such. I was so shaken I considered calling the police.

Pretty sure boats have been coming here since before their were houses.

The Wealthy population is waging a campaign against the few users who cannot comply with normal rules and lifestyles

There are few safe spots to moor on the river and the Mead lane moorings are essential for safe navigation of the river. Taking away more mooring spots on the river will make it impossible to navigate safely.

It is the only 2 week space safe place to moor on the river with my child. Without it I wouldn't cover my Milage and Be of risk of loosing my home

no

I notice that the live aboard boating community can be much more respectful but there are boat owners who don't consider their impact on the bank and the trees. I also notice that boats moor for substantially longer periods and people do not get moved on. There seem to be more and more boats moored for seemingly long periods whilst the owners refurbish the boats. It restricts other river users gaining access to the river (canoes, dogs, swimmers, fishermen etc

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

The damaged river bank and its flora need time to recover. The quieter winter months are not long enough for this to happen. The otter "haul out" and wildfowl nesting areas should be kept clear of moored boats and parked motor vehicles too. Overnight parking and sleeping in vehicles should be better controlled. I'm fed up with my land (two acres next to Mead Lane) being used as a public toilet. Some boat dwellers' keep their dogs off the leash (unlike most walkers) for much of the time. Sometimes they get onto my land and trouble the livestock.

This section of the River is particularly beautiful and should be enjoyed by all, particularly walkers, cyclists, canoeists and passing boats. Allowing what seems like totally uncontrolled mooring by run-down near-derelict boats whose owners often appear oblivious to the needs of others, particularly local residents, significantly detracts from the beauty of the location and stops the majority enjoying the space. There are plenty of areas further along the river, near the Water Works for example, that could be used for such mooring experiments that could be offered if needed. BUT NO MATTER WHAT IS DECIDED THE SCHEME HAS TO BE PROPERLY SUPERVISED AND CONTROLLED.

No

In the field above Swineford weir which belongs to Wessex Water there is a boat pontoon there, restrict the moorings to that area 48hr max.

A minority of boats moored on Mead Lane, and the associated road vehicles are an eyesore and an obstruction, and are antisocial to other visitors

The river bank allows residents to enjoy the open space and should give them priority on its recreational use

This survey seems biased. I thought there would be more general questions. Why is there no balancing strongly do not support?

There is a huge lack of moorings and marina space in the southwest which means prices are unfairly very high to boaters.

Yes the current people

That arrive stay longer than required and use the pace to moor whilst going to work is purely selfish with plenty of marinas in the south west, they use trees to attach mooring lines and they must disturb wildlife such as otters which I don't ever see here anymore and less nesting ducks.

Both myself and my 5 year old use the river daily for swimming, canoeing, paddle boarding, etc.. and we are continually fishing rubbish from the river. The increment in rubbish recently is more than ever before! Additionally there are many live on boats who do not more at all, which begs the question as to where all the "toilet" tanks are being emptied into!? And what happens when my 5 year old and I swallow that same water!? Also I have noted that the local wildlife is often forced onto the road and into some residents gardens as there is no where for them to set down on the embankment due to so many boats moored end to end and in some cases 3 wide!

A Local Nature Reserve (with a mooring ban) as proposed by Saltford Environment Group and Saltford Parish Council at Mead Lane seems the best and most positive solution. Measures should also be taken to keep vehicles off the riverbank's grass verge (but those measures need not wait for the LNR designation) and to stop obstructive parking from blocking access for residents, emergency vehicles etc.

Saltford Environment Group has produced a paper making the case for a Local Nature Reserve at Mead Lane with professional advice on the ecological aspects from our wildlife adviser. This has been emailed to Lemon Gazelle. SEG would see this as a positive outcome to rectify the damage done by moorings in recent years. This would take advantage of the riverbank's ecological advantages described in our paper and has easy visitor access including for cyclists as two access points for the Bristol to Bath Railway Path are close by.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

SEG's members in Mead Lane have expressed a willingness to assist with habitat management, and we would expect others from our 550+ membership to readily participate. SEG asks B&NES Council to work towards the creation of a Local Nature Reserve as a matter of priority in partnership with SEG, Mead Lane residents and the Parish Council. Using SEG's case paper as a starting point for the LNR, this will return Mead Lane to being a location enjoyed by the many stakeholders who have been restricted or have felt excluded by the mooring trial that simply exacerbated the negative situation experienced by the general public during the boating season. Physical measures should also be taken to prevent vehicles from mounting the riverbank's grass verge.

what benefits does moorings bring to Saltford environment?

due to moored boats who stay for much longer than the time allowed anglers find it very hard to find a place to fish and most times we cannot fish at all and alot of boaters do not have licences for their boats whereas us anglers have to pay to fish.

Remove all car parking.

litter, and overspill of the boats that are mooring onto the bank its a real eyesore. In places i cant use the bank at all for sighting bireds and nature etc.

Only that the recent trial clearly demonstrated the problems that will arise, and probably increase, if such a policy is continued, not to mention the adverse effects on the local environment.

We are a family living on a boat. We need our children to attend school fully (in Bathampton) but also need to meet the distances as required for our licence as required by the Canal and River Trust. We therefore need to go on the river to do this and having moorings at Mead Lane is very important to us.

I cant beleive you are proposing to get rid of mooring here. By doing so you are killing a community. DONT DO IT.

give us a few more moorings between bath and Bristol we can stay for a week

I like the boats mooring. I like the residential boaters who respect the area, and would welcome action to tackle anti social behaviour by any boaters or homeowners.

Boaters are residents too. You the council are our councillors too. This river has been navigable for around 400 years. We often face prejudice from individual local residents who see their (comparatively) recent home as having sole right to be there. Most people aren't like this. But the ones that are allow their prejudice to disproportionately take up different councils time. Personally I would rather there were more boats and less houses. The landscape would be far more natural if this survey was angled in that direction. If this is truely about wildlife rather than bigotry perhaps it could be discussed. These boats are our homes as much as the houses that most people live in, and we impact the environment far far less. It's true that there are some antisocial people on boats. There are also antisocial people in houses. Please don't allow these people to control the agenda for the vast majority of us through another form of antisocial behaviour.

Parking! During peak mooring there's far too many vehicles on Mead Lane. The council isn't marking lines correctly therefore making me manage parking to gain access to our driveway.

I understand that mead lane is a legitimate mooring under the Public Right of

Navigation on rivers and the British Waterways Act 1995. To remove a safe mooring from the river can only put lives at risk

Embrace boaters & provide European standard mooring & infrastructure facilities.

If there were more mooring options on the river mead lane wouldn't be so congested and the local housing residents wouldn't be so aggrieved. This whole situation is purely down to lack of

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

moorings and therefore removing one of the only sites available isn't going to alleviate the situation it will make it worse.

Condition of the road surface which is used by heavy vehicles going to and from the sewage farm
Over night sleeping in vans and cars. Lots of cars parked by boats which would hinder emergency services.

We have experienced many stropky (live aboard) boat owners in the last few years along the stretch we sail. We have suffered illegal moorers who refuse to move, even when the signage is pointed out to them. We have experienced many double parked or even triple parked boats that narrow the river space to almost unusable for sailing. As a club we have been sailing this stretch for some 50+ years and never before have we had so much infringement/imposition on the space we use. We are finding it very difficult to keep sailing safe for our members in the face of increasingly unruly other use of the water. Live aboard boaters taking up more and more space, paddle boarders with no ability or understanding of water rights tottering around amongst the sailing boats, will swimmers who do not seem to appreciate that they are not easily visible to an oncoming dinghy or even a riverboat under power. Nobody seems to legislate any usage at all and yet we have to have a river licence to use the water but it counts for nothing when paddle board companies (making money out of this area) are not paying any licence fees at all.

Seems crazy to consider the removal of well used mooring spaces.

Tidy the unsightly mess within the boat yard.

Mooring between bath and Bristol is very difficult so please retain these moorings but move overstayers on

Swimming, weed smoking, parking on mead Lane strictly should be stopped

No

I think to have a complete ban of moorings on 50% of that bank would restore some balance to the area.

A mooring ban is not necessary. Can the canal and rivers trust do more? Can Avon and Somerset police do more to deter the behaviour of people racing up and down to the Jolly Sailor.

This area is an intrinsic part of the village and needs to be kept as such.

Residents own the houses on one side of the road but they do not own the riverbank. It is not a site of special scientific interest neither does it have wildlife that is not prevalent in lots of other locations. The residents of mead lane do not have the right to harass boaters for mooring legally. I have witnessed this on several occasions and it is very upsetting

There should be parking restriction along the verge of the river. How can we value the presence of otters here at the same time as allowing the unregulated mooring of boats along Mead Lane? The use of fires and BBQs for cooking on the river verges should be banned. The whole stretch of the river bank in Saltford [Mead Lane and The Shallows] should be regularly policed as much anti-social behaviour is disruptive to the residents and others who appreciate the wildlife and tranquility. The Shallows car park is often littered with evidence of drug usage.

I have seen a huge decline in the amount of kingfishers than I used to see.

The location at Mead lean is a terrible ill thought out option for moorings there is no supporting infrastructure, Boaters are regularly overstaying the time limits and these are not enforced by anyone, there is regularly anti social behaviour, littering and human waste being released directly into the river making it unsafe for sailing and other water sports. Residents and members of the sailing club who have used the area for many years are subject to abuse in some cases resulting in the police attending. The area was a haven for wildlife but this is increasingly being scared away.

I see no practical difference between mooring for 2 or 14 days. If the spaces are filled all or most of the time, the ongoing disturbance for wildlife and for people living there or visiting the area is the same.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

I think we should respect the right of people to live on boats, encourage diversity, and instead offer better facilities (that people who choose to moor would need to pay for)

As a local womble I am well aware of the litter problems in this area, including significant amounts of plastic and glass bottles.

A friend who has a property on Mead Lane reports the difficulty turning into her own driveway because of vehicles parked opposite. These are often long stay vehicles , and sometimes campervans. Boat mooring seems to encourage other long- stay visitors, or are vehicles belonging to boat owners and/ or friends of boat owners.

We shouldn't be penalised for a few over stayers.

I think if some other parts of the river were made more accessible for boats to moor on there would be less desirable as boaters would have more choice. I like that there are 48hour mooring on mead lane as it gives more boats the chance to stay and enjoy Saltford.

48 hour moorings for holiday makers is fine, we need tourism for the local businesses but this is currently abused by people staying weeks at a time on a 48hr mooring!!

Increased enforcement by BANES/Police/wardens? for overstaying and ASB would help visitors /residents enjoy the location more.

This area is not suitable for moorings at all – there are plenty of other areas that have the necessary facilities for moorings. There have been many issues with antisocial behaviour and damage to the riverbank and this is not acceptable in this small peaceful village location.

A much more limited provision for 48 hour mooring, so people using boats for leisure only can still moor and a an on parking alongside the river bank. The parking of vehicles by people that live on the boats is as more of an problem that the boats themselves.

When there were fewer moorings it was nice to see the occasional craft moored up (without the associated motor car and or van) . The crafts were generally pleasant and added a little character to the riverbank. Now there are craft all along this stretch taking away the character of the location.

Robust enforcement of mooring stay times and CRT boat license T &C relating to antisocial behaviour would solve the problems identified by local residents and others.

Living in Bathampton i appreciate the colour & diversity that the boaters bring - both liveaboards & tourists.

there are not many locations where disabled boaters have good road access to the riverbank and Mead Lane is one of those.

Closing moorings will not improve the site in any way. This is nimbyism and local residents should be ashamed of themselves

Would love to see a natural wildlife sanctuary

Not all the residents are off with boaters. Surely visiting boats are bringing custom to the local pubs and businesses which can only be good

No

A few boaters spoil this wonderful ammenity for the prople of Saltford and surrounding villagers

I cannot understand why the enjoyment of many has been allowed to be spoilt by allowing a few people to moor along the bank. Who now enjoys an uninterrupted view? Not the residents of Saltford or their visitors!

Mead Lane is an important stopover and meeting point for the boater society. We cherish this unique spot and especially for 'newbies' it is a great place to connect and enjoy this important space. Most of us boaters do stick to the rules and understand the issues and interests of the residents.

An alcohol ban

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

the moorings have led to excessive parking of cars on Mead Lane

Rubbish and cars on the verges belonging to the boats some of which even 'double park' . Intimidating to walk there . Not able to get to the water - saw an old man trying to fish and he had to pack up and leave .

Leave enough free bank area to safely launch Kayaks.

The drive to close the moorings seems to have been manipulated by residents of Saltford (Mead Lane probably) claiming that boaters have left rubbish and done damage and left human faeces. They claim that the mooring area needs protecting by making it into a local nature reserve with a mooring ban. Every minority group in history just about gets accused of insanitary, dirty behaviour. Please don't fall for this, BaNES Council. We really need these moorings and we really need the Council to support our minority community against the might of wealthy, well connected powerful residents of Mead Lane who are motivated by hate towards us. It cannot be right to let them get their way and ban mooring here.

I used to walk in this area with small children to see friendly ducks. It was a place of quiet respite and beauty and a place to see nature around and beyond. A Hospice nurse told me she used to come to the river often to sit on the Sailing Club seat as a place to recharge herself from her onerous duties. It should be again a place of peace and tranquility as I knew it where we can bring children to see nature. It is the Arcadia of Saltford. Now we have a stretch with parked cars and Barges. From Paradise to a Parking Lot.

More moorings between bath and bristol

I think there should be a number of residential moorings created.

A Local Nature Reserve as proposed by SPC and SEG would be ideal.

The moorings are a terrible idea. Why should an amenity, which has been enjoyed for generations by villagers and visitors, be spoiled so that a few people can park boats there and make a mess of the riverbank?

The bank along Mead Lane should be a great area for wildlife to enjoy.

Do not remove moorings for compliant boaters who are often taking the lead in improving their surroundings (environmental and social awareness, litter picking, campaigning for eco project etc), but rather enforce existing rules to stamp out detrimental behaviour by a minority.

A lot of the large moored boats have no training or knowledge of the rules of the river or river etiquette , this should be a condition of being in charge of a large boat as they are unsafe

I think that to remove the right to moor at Mead Lane would only temporarily address any issues there. I think that if the residents of the houses are given more power, they will not stop at merely preventing the mooring of boats. The behaviour I have seen from them has been abusive and this behaviour should not be condoned.

If the moorings were to be taken away, for me personally, I wouldn't really lose out. I move my boat a great deal and don't like to stay in one place for too long. However, it would greatly effect my child. Mead Lane is a nice, safe environment for him to learn about nature and to swim in the river. If that were taken away, I feel it would be completely unjust and a great shame.

The 48 and 14 hour mooring seemed like a good solution but the Moorers do not adhere to this and overstay, as they know noone is Policing the riverbank. They quite often have large vehicles which are left parked for weeks, again they know they can do this without problem. We live by a 48 hour zone and have very politely advised people mooring of this. Most say they will move when a space is available in the 14 day but more often than not Boaters ignore us and some can be abusive. In the last few weeks I have seen oil seeping out of a boat into the river and I wonder what happens to the toilet waste of all these boats.

I strongly support the Local Nature Reserve suggestion. We moved to Mead Lane primarily because of our love of spotting Otters, Kingfishers and Herons, Deer and we feel their habitat is being destroyed.

Boats often are undergoing maintenance create noise and other pollution. No room for day users such as paddle boarders, swimmers, kayakers, to access the water so they try and launch via the sailing club's private dock which causes damage and congestion.

There is a marina they can more at up the river at The Riverside.

The Parish Council and the Environment Group have made a fantastic proposal and I would totally support the establishment of a Local Nature Reserve. This would be entirely suitable for the location and the limitations of the area. The trial has been an increasingly difficult process and delays following the trial has meant I have experienced total lack of amenity this year, due to a minority of boats who have dominated the riverbank by overstaying.

The rubbish I removed when moored there was left by day visitors. We didn't even run our engine while moored there out of respect for the neighbors (even though it's very quite).

No

If the problem is overstaying and antisocial behaviour, the solution is better enforcement and to take action against the specific perpetrators. Please do not punish well behaved boaters who comply with the rules, because of a minority of badly behaved ones.

The riverbank has been badly treated and once the boats have been given notice to leave it should be given a clean up and repaired.

There are far too many boats moored along mead Lane and they and they're vehicles are an eyesore. There are unruly and aggressive dogs as well. The 14 day mooring don't work because all they seem to do is shuffle the boats around. They need to move from the area for a period before coming back again, just like a car park

Residents abusing boaters. Foul language. Racist comments. I've had abuse on more then 3 occasions for simply mooring up. Even been followed inna car by a resident

More 48 hour moorings means a higher turnover of boaters coming and going, which impacts the riverbank and local wildlife negatively. More 14 days means more opportunity to overstay but surely it is CRT's job to monitor this and, if boaters exploit the guidelines, can be advised to move on unless they have special requirements (health appointments in area, road access for mobility issues etc) which mean they can stay.

Private moorings acceptable

The local residents claim that the council encouraged residents to keep tabs on boaters and do the policing themselves - this must be unlawful and resulted in blatant harassment and invasion of boaters privacy. I personally have never been confrontational with residents on mead lane but yet i have been on the receiving end of harassment and abusive behaviour more than once. The police were informed on these occasions and the residents were warned to stop the behaviour in question. They have not stopped. I feel compelled to add my two pence for balance. It is very worrying that the antisocial behaviours of residents has been repeatedly glossed over by every organisation who claims to be addressing the issue. The fact that boaters behaviour is repeatedly cited and that of residents is not is a clear example of prejudice.

There are very few places to moor on the River already, it would be an incredible shame to prevent people mooring here.

Parking and busy banks forces pedestrians and cyclists onto road, can be busy traffic. Unsafe and unpleasant

Every time I have visited this area it has been clean, tidy and well kept by the boaters staying there.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

The boats have been around longer than the houses and locals. They are the reason the water ways are kept moving and maintained. The people who live on the boats need places to stop and stay when passing through.

I feel sorry for the residence of Mead Lane as the noise from the boats in the summer distracts me as a runner, let alone as a neighbour! It is also not very nice running along there alone when it stinks of pot, I feel a bit intimidated.

Be more proactive in policing the mooring durations. A breach of mooring times is a breach of the license.

CRT to actually take these continuous cruisers to task they should move on after 48 hours

There are relatively few spots to moor on the river between Bath and Hanham, preventing mooring will reduce options further and prevent holiday makers like our family from visiting Salford, fish and chips and the shops and the two pubs which we use when staying overnight. Like most other boat users we only ever stay for one night whilst on our journey to Bristol. CRT should enforce the restrictions in place. I hear see boaters see the river as a bit of unenforced stretch. Its totally unfair that the actions of a few boaters ruins it for everyone else.

It is my view that some of the people moored there and people picnicking do not care about damage to the riverbank and local wild life and are quite happy litter, including whole bags of rubbish I have seen during litter picks as a Salford Womble.

Nobody patrols or enforces the area

Dogs not maintained on leashes from the boats that have scared pedestrians.

I can see the need for a couple of 48 hour moorings. But do not see the need for longer - some people seem to be permanent?

Let's all be more mindful and tolerant of each other and preserve the natural beauty of this spot for everyone to enjoy

No one has the right to foul up the countryside. Whatever the circumstances of the boat owners they cannot use any river spot to ruin it with no consequences. There is no facilities or space for facilities to cater for them. I live alongside my next door neighbours and we all respect each and look after each other, but there is no respect for the home owners along Mead Lane

More boat launch spots. Allow more people to access the river in proper launch areas to reduce erosion of bank.

You may not have a legal right to close down the moorings. The right to navigate the rivers, and to moor for a reasonable length of time, is enshrined in Magna Carta, and has stood since that time, despite the efforts of various 'authorities' to over-ride it.

These areas thrive with boats there as it helps to manage the space and assists in keeping water moving.

Yes the permanently moored barges down by the rowing club and the Riverside restaurant.

The river and boats were here along time before the houses on that stretch, the new invented conservation angle is just a new tactic not backed up by any evidence to remove the majority of respectful, law abiding boaters the boaters who do not abide by the rules will do so even if you do ban them so you are effectively trying to tar all with the same brush. This is an act of prejudice towards all boaters.

I think this issue has been brought to a head by richer bullies who live near the canal and don't like sharing space with people who are different from them it's a disgrace.

The home owners need to be respectful of the boat owners. Some boat owners need to be respectful of mooring terms and conditions

What about the gardens they are making on the banks?

Can it be asked why people buy houses by a waterway and then do everything in their power to ensure that as few as possible other people are able to enjoy it? The river and the craft that float

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

upon it were there long before the houses and given the way climate change is going, boats will be our last refuge.

Ensure mooring is enforced to enable visiting leisure boat which are passing through to moor and enjoy the place

I would have a mix of 24, 48 and 7 day moorings, with a max of 8 days in any 28 day period.

The boats which moor in Mead Lane disrupt the riverbank's natural functioning....birds and animals cannot get in and out of the river as they cannot reach the bank. Where does all the waste from the boats go? Into the river?!

This is blatant bias against travelling people. The residents have no right over the river. Problem boaters should be dealt with individually instead of spoiling the mooring situation for everyone. It is simply unfair and should not happen.

The moorings bring life to the river, together with a feeling of security having people there.

SPC welcomes and supports the case made by Saltford Environment Group for the creation of a Local Nature Reserve at Mead Lane in SEG's paper of 5th September 2019 (to be submitted separately). As described by SEG, the riverbank's south-easterly aspect means that it can support rich water-edge herbaceous vegetation and the shallows warm more than typical along this river, increasing local habitat variety. It benefits from easy access. These features combine to make it unique and thus an ideal location for a Local Nature Reserve. SPC considers this to be a very positive way forward to maximise the value, use and enjoyment of this location by the majority of stakeholders.

SPC therefore asks B&NES Council as the riparian owner to urgently pursue the creation of a Local Nature Reserve at Mead Lane and that SPC, SEG and Mead Lane residents are consulted and kept informed of progress, including design, for this project.

The riverbank requires better protection from vehicle damage; the existing bollards should be replaced by a more effective system for keeping vehicles off the grass verge.

ban cars etc from the area of the nature reserve

strongly police the existing rules.

The locals are the problem, not the boaters.

The majority of live aboard boaters will keep the area tidy and be respectful of the place. If they were reduced I believe the mostly city based people that will take the place over will leave moor rubbish, fires and anti social behavior. There is already a picnic area nearby and a real shortage of legal moorings on the river. As it is river with historical history of use by boats it would be fool hardy to pamper to the wimp of snobby residents.

There is a pollution risk to having these moorings as boats empty their brown water directly into the river.

Worked near the River for years 15+.

Recently due to overcrowding of boats and stationary Dogs, the wildlife has moved on. Used to see nesting ducks, herons, Comerants and the occasional Otter. It's been a while since the river has shown its full potential. Even the wildflowers and reeds that used to offer a habitat for Dragonflies, mayflies and butterflys have all but disappeared from the road side.

Why can't people just get along!

Overstays are a major issue. Too many moorings in a residential area.

7 day options would allow visitors to Moor rather than same old people hogging the space in relay

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

There are no mooring facilities, so the boats are tying up on the old trees on the river bank, sometimes two/three at a time. If you want to preserve this area of natural beauty, stop any moorings (unless a resident).

B&NES should work with the canal and river trust to enforce mooring regulations that are already in place, rather than responding to complaints by jingoistic house dwellers who seem to have been given the power by the local authority to monitor the mooring situation there.

It'd be a mighty shame if such a beautiful spot was closed to boaters, the vast majority of which are wildlife loving, polite and considerate individuals

None

We noticed a few weeks ago whilst walking along Mead Lane a sign post warning of an Otter outlet and a long boat was moored directly in front of this outlet.

Greater availability of bins including for dog waste would be beneficial for boaters and others alike.

NIMBY residents of 10 houses shouldn't be dictating mooring policy

It needs to be properly controlled so all boaters can enjoy it needs tougher enforcement but such a shame for all and a bad reflection on the paying boaters that follow the rules

What about the sailing club? Surely no moorings bans them too?

What are the supposed 'health and safety' reasons for closing the moorings?

The impact on the river of boat residents acting without respect to the environment - throwing things into the river and their waste. It was right to do the trial, but it's too much cost to the many people who enjoy the area, and to the environment, and it doesn't actually benefit many boaters as there are so few moorings anyway.

The council and CRT already have the power to move overstaying boats. Better enforcement is required to deal with minority of troublesome boats. These troublesome boats will likely ignore a mooring ban anyway without the council gaining extra powers of enforcement, which they cannot. A blanket ban also prevents legitimate visiting boats benefiting local economy and providing attraction to visitors. CRT recently did a nationwide survey which found looking at moored boats the main reason for the public to visit waterways.

There should be a mooring ban and B&NES should create a Local Nature Reserve.

Historical residents moorings should be kept

The moorings there mean the area is safe at night, its a great way to use the area and brings diversity and different groups to the spot.

Just the fact that the we no longer feel comfortable moored in a spot where the bigotry is so overwhelming. The river bank should be enjoyed and shared by all not just a handful of people that live along there.

Remove the moorings at once.

And review you stupid decisions to slow this to happen in the first place. As these people do not contribute anything to the community or rates to BANES.

Bins and a water point please

Is just damaging the views and the environment because of this.

At present the mooring time limit is not enforced, resulting in long-term occupancy of moorings

Regular patrols to prevent overstaying and a code of conduct on the appearance of boats

Frequent drunk people wandering up the high street from the moorings - feels very unsafe

Their disposal of sewage concerns me! Is it straight into the river? I'm assuming it is!!!°

Horrendous on every level!

There has been a determination of nature and wildlife in the area. No longer a pleasant area to take my grandchildren who live in Saltford.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

Vehicles linked to the moorings cause disruption to traffic flow on the road due to being parked along side boats. It's been chaos on several occasions.

This is very clearly a completely inappropriate site for residential boat users. To make it appropriate BaNES need to spend over £300k in infrastructure to support Boating residence and a further £100k pa for the management of the facilities. It's stupid to just hope it sorts itself out.

Wildlife need to be protected. Boaters need facilities to drain their Bilge pumps rather than in to the River as they do now. They need connectivity to the public sewer system. At night they pump out their tanks so they don't lose their river position. Management would require authorised officers based at the site to report and control inappropriate behaviour.

I think boaters should be accommodated and welcomed along the Avon and have always felt that the boating community live alongside other residents respectfully in this area. The boats belong on the river and add a lot of character to the natural beauty.

I'm so sad that a noisy minority of localso and a noisy minority of boaters are going to ruin what is a happy situation for everyone. I'd been mooring there for 15 years without ever over staying or any complait's.

As there are so many boats on the river side, there is very little option to sit by the riverside and enjoy the river

I don't really understand where the thrust for this has come from. As far as I can tell actual relations are very harmonious in reality (although I have heard stories that some people in houses don't like the boaters being there). The boat's presence on the lane is long established, and taken as part of the provision along the Avon it is our home and dwelling.

The space should be managed for all stakeholders, excluding one group isnt the answer.

Great community, an asset to bath

The problem is that if we let mooring continue to be acceptable, this acceptance/ tolerance will be abused with few possibilities for control.

I like the boats they add character to the area

The problem with allowing moorings along the river is that people take up residency there and I have concerns about the dumping of sewage into the river along a stretch where people are fishing, canoeing, paddle boarding, sailing and swimming. I was appalled when sailing past to a moored narrow boat last summer a couple were lowering their young children into the water for a swim . Not only were they putting them into what I thought was literally a sewage bath, judging by the smell , we have had a number of drowning incidents .

This is ridiculous!!!! Getting rid of the moorings will affect so many boaters that respect it.. sadly you guys won't listen to us and I'm sure the moorings will go because of the residence there. Just because a small number of people abuse things then we all get tarnished with the same brush and it's not fair.

The council must consider all opinions of Bath residents with equal waiting. To do otherwise is undemocratic and contravenes council regulatory guidelines.

Ruining area, use to have dicks and swans along riverside, due to moorings this is no longer the case, ruining wildlife.

Every time I have been there I have always been respectful of neighbours and peace and quiet but seems to be a small

Minority who will not support this in anyway

At the moment the only place to legally moor on the river for 2 weeks is Mead Lane. If I'm coming from Bath I've just got to hope I can find space as there are no other options for someone who works full time.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

A couple of the residents are distinctly unfriendly to boaters and very vocal about it. I suspect that they don't want boats 'spoiling the view'. This feels unfair as boats have been mooring at this spot longer than these people have been residents!

The location is a rare one where people can access the river by car. I do not understand why there is a need for moorings on this section at all when there are marinas and miles & miles of other riverbank where boats could be moored that would not affect the view, traffic, residents etc.

There are hardly any moorings between Bath and Bristol and if this one is lost it would be a real tragedy for the boating community making it very difficult for continuous cruisers to comply with Canal & River Trust guidelines.

Getting rid of the moorings is in my mind unlawful and against culture of the river in this area. Boaters are part of your community.

C&RT to police the moorings on a frequent basis.

I feel the current situation seems fine although I know a lot of boaters say that moorings are limited and hard to come by there.

There is a lack of river moorings with road access & as I have a child to get to school this is important

The creation of other moorings in the general area could alleviate the pressure on Meade lane

Live and let live the river is for boats and wildlife, humans with issues need to put things in perspective

The use by "travellers" and people living seemingly under the "radar / off grid", in scruffy, polluting old boats (GR and old narrow boats). They contribute nothing to the area in fact they are living for free and are intimidating.

The rise of anti-social behaviour of other river users. Sometimes I don't feel safe for myself or for my children when sailing. Also there are times when I feel intimidated and worry about dinghy being left in the dinghy park at the sailing club

More communication

My choices above are based upon the responsible authority not enforcing their own rules.

If they did my views would be altered.

Residents unlicensed boats on the mooring and therefore uninsured

There are so many issues that we as residents have had to endure over the past 3 years, brought about by the Council's mooring trial and the subsequent abdication of any responsibility to act on the results by the council officials. The list of problems/issues would run to many pages and so we would welcome the chance to meet face to face to put our case and agree a solution. It has been an utter disgrace and we trust a solution will be found as a result of this investigation/survey.

The people who own the houses next to the river harass the boaters everyday. I have moored there for 2 weeks this season and not one day went by with someone complaining about something or other. Something we do not experience anywhere else on the river/canal between Bristol and Great Bedwyn. They seem to be policing the area, monitoring your movements by boat and car and sticking notices on the boats even though they have no idea of the situations or of any invisible disabilities. It becomes quite stressful getting home from work to be faced with someone complaining about your lifestyle. The residents have built their own moorings without planning permission and put rowing boats there that they do not use in order to reduce mooring spots for liveaboards. Making it very hard to use the river in the way that we are allowed and pay to do.

If the grass area was reduced slightly, the parking issue would dissolve away.

which came first - boats mooring here or the houses? I suspect it was the boats.

Narrative answers - Are there any other options or issues you'd like to bring to our attention?

This area is a resource use and by many more people than just boaters and residents. People come from Bath and Bristol to enjoy the area. Boats add to the charm that people come to see, and boaters are not the largest group of visitors by a long way

Would be amazing to see it turned into some residential moorings and visitor mornings. There's a great community down there and the river lacks residential spaces!

I'd like to see further moorings on the river to alleviate the pressure on Mead Lane.

Maybe make use of the bank from Mead Lane up to the shallows, past the private moorings. There's a lot of river bank that isn't used by anglers, it could be cut back to allow moorings. The car park and toilets should be made available too. Maybe mooring posts on the opposite bank, just to tie up to, no access to bank. Just if you need to moor up for a while. The River Avon needs a massive clean up, so many trees are hanging in the river, they need cutting back, for anglers and boaters to enjoy the river.

How is it that the most beautiful part of Saltford, which should be enjoyed by the many, has been taken over by the few!! Give the boating community a better and less intrusive site which is NOT in a residential area. A site that has proper amenities with pumping out/ water/power etc. Our riverbank is very precious to those of us who care. The abuse and degeneration of the bank is heartbreaking for those of us who have lived here for almost a lifetime. (46 years). Access is chaos whenever the sun shines. So it's only going to get worse with global warming. A sensible solution implemented now will save time and money in the future, no doubt.

There's permissive walking access on the opposite side to Mead Lane. So I'd rather see less cars parked but really like the view of boats from the fields opposite.

The above options are worthless unless the authority manages the site. At the moment boats are moored anywhere on this stretch of water with nobody taking any notice of the mooring restrictions.

There are no facilities for the disposal of human and other waste on this reach of water. Without such a facility, it is presumed the boats moored for long periods of time must be pumping their human waste overboard!

Let's try to not make it into a money-making scheme.

The River Avon had a public right of navigation. As part of this right of way, boats can stop and moor temporarily. It is not as simple as putting up no mooring signs.

This area is located on the edge of the Cotswolds AONB and should be afforded the same protection. The unique access to the River Avon needs to be protected, as does the recently impacted wildlife and associated habitat...

APPENDIX 10 – Q10- Future Management

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Mooring should not be allowed . Who would be available to monitor any abuse of the regulations ? The area which was once beautiful is now covered in mess with unkempt boats and the smell of fumes . Water pollution is a concern .

The road was so lovely with wildlife and wonderful views, everyone should enjoy it and putting traffic management and enforcement in will make the area less inviting.I think putting more lines on the road or signs up or more bins will have a detrimental effect on this once lovely tranquil lane

Moorings should not remain, it's dominated by the boating community, the public are unable to picnic on the verge, no one is fishing, people who are walking can't see the river due to the boats being in the way

I cannot see any enforceable action that would be abided by.

Pollution - the boats are lower down than our houses so the smoke from their woodburners comes into our houses. People continue to park so residents can't get out of their drives.

There is no enforceable management of the moorings that would work. The vehicles that belong to the boaters constantly obstruct the small road causing havoc for emergency services and Wessex water vehicles not able to get through causing them to have to abandon reaching Wessex water.

It would need to be managed better to tackle over staying and services provided ie rubbish disposal & water points.

Designated parking spots on Mead lane would be very useful. Being clear where you can and can't park. Not risking people damaging the grass verge. There is no other parking anywhere near by for river users (other than if you were to make an agreement with one of the pubs to use their car park.) I don't see that Mead Lane has any special status over other mooring spots on the river. I would expect the Canal and River Trust to deal with overstays the same as for other moorings. I think if anything might help deter boats overstaying it is to have more designated 14day moorings on the river as a whole between Bath & Bristol. I would imagine that people would be more likely to leave on time if they knew that another mooring spot was not too far away.

If the moorings do remain, the council have to take action to enforce the regulations. It's futile for residents to make suggestions if the council won't follow through with them.

The council haven't controlled Mead lane yet, so I don't believe they will in the future

I support the idea of designating the area as a nature reserve. Access and enjoyment of a natural river side is denied to residents and many visitors alike who enjoy sitting, picnicking, swimming, canoeists by the presence of these boats. by the

Restrictions on length of stay, and an annual maximum number of days / visits. Strong enforcement including penalties for breach of conditions

If any moorings remain they should be part of an overall plan for a Nature Reserve or similar with the moorings being limited with a maximum stay subject to charging and enforcement.

There would need to be a way of 'policing' this as previously this was not managed and the road was full of parked vans and vehicles, visiting those on the moorings. Some people were very noisy and disrespectful of the environment- littering etc. There was also damage caused to the bank. Long term erosion to the bank has implications for the road access to properties, Wessex Water

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

and the Jolly Sailor. A strict charging system may modify this, but as previously stated, would have to be 'policed'.

The boats being moored should look as if they are well maintained and lived in - some look as if they are dumped there and rarely used. Loose dogs can be an issue when they persist in following my dog (on lead). Boat owners dogs should not be allowed to be loose - there is a road, no pavement.

Enforcement of charging system and regulation of mooring stay and some method of policing

There should be less boats and it should be patrolled. Fees should be collected and mooring times monitored. There is no adequate sanitation there. I don't think B&NES and the powers that be have the resources to monitor the riverbank, hence it has been left unchecked for so long.

Enforcement must be actively pursued

Take more control and far less doubling up.. Noise control too and rubbish!

Would def need reservations and charging, clearly publically displayed and only at specific moorings so as not to undermine the flood defences

I'd prefer to see an absence of moorings and for the area to be enjoyed by residents and visitors for its outstanding beauty and recreation

If the moorings were to stay i wouldlike to see strong control of mooring stays, care of the riverbank good traffic management for the welfare of pedestrians

CHARGING SYSTEM

The whole area should be managed as a prized beauty spot - and available for ALL residents of BANES to enjoy. The wildlife and riverbank should be protected and not allowed to deteriorate . The current debate on climate change and other pressing environmental issues should be given full attention.

Parking should only be allowed for disabled. Double yellow lines.

Not sure how it can be resolved, but I think traffic (cars and other motor vehicles) is the issue. Specifically allocated parking areas?

Not up for discussion in my view they should not be there.

I have no faith that the moorings would be managed in the future as no resource has been allocated to the current moorings by BANES or the Canal Trust. No responsibilities appear to have been agreed for enforcement and management of the moorings. If the moorings are to remain the responsibilities and authorities for the management of the area must be clearly agreed, communicated, resourced and enforced. This is for both on the water e.g. overstays, and on the bank e.g. traffic management and car parking. If a reservations / charging system is introduced this must again be resourced, managed and enforced - if a reservations / charging system is to be used then the moorings should not be allowed until the system is put in place. Traffic management will be required for car parking to ensure that residents can access their properties, and that vehicles (cars, heavy goods and emergency services) can access the local businesses and sewage treatment plant.

The riverbank damage and an "unregulated, unmanaged and unofficial marina for live-aboard boat people", should be treated as two separate issues. If Banes feels it has a duty to provide mooring for the "boating community", it has to provide a managed and regulated marina with facilities for water, waste management and in an area where it is appropriate. The Mead Lane riverside is definitely not appropriate for this, its residential location, flora and fauna, the problems with the erosion of the banks and the likelihood of subsidence of the road, loss of amenity to thousands of visitors, fishermen, kayakers, picnickers, plus Health and Safety issues, re-inforce this. The shocking fact is how the previous Banes administration achieved so much

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chaos by "slight of hand". The present administration has the opportunity to put things right; stop all moorings immediately, support the Salford Environmental Groups work towards a Local Nature Reserve, prevent campervans or overnight sleeping in cars/vans and ensure all measures are put in place to prevent any further erosion of the riverbank and reduce the potential of risk to road subsidence.

Please see Note 8

No vehicles parking overnight, strict enforcement of any mooring by BANES

System to detect and prohibit unauthorised moorings and enforcement of penalties or removal for failure to comply. Complaints process to enforce acceptable behaviours by moorers

Keep the enforcement as it is by CRT, enforcement should be consistent across the entire waterways of CRT and not done piecemeal. What would be the audit trail of any other organisation's right to take enforcement action? What laws entitle them to enforce against boats? Most boats do not overstay except when they need to this includes flooding and there is a need to have a safe haven which Mead Lane is up to a point, otherwise boats will sink and boaters will be forced to moor or navigate in unsafe flood conditions leading to possible drownings. The council is very keen to stop people drowning in the Avon, why are they so keen to on the other hand put boaters at risk? Are our lives less worthy than drunk young men in the centre of town? I hope you will agree that they are not less worthy, otherwise I may just as well drown myself now.

The problem is more widespread than Mead Lane alone.

I am concerned about the condition of the river bank and the road being so close at parts. Access is obviously needed but either boats are causing too much congestion along some parts of the river bank.

Unsuitable in this location for infrastructure and environmental reasons

I'm sure if they were charged council tax they would soon move.

STRICT enforcement of the 14 day moorings..regular bin services like those of the local residents.. try to encourage a family friendly environment as many boaters are friendly and communal so its helping those have the access points to water services and water then perhaps you would have nicer kinds of boaters around

We've asked countless times for management, charges, and sleeping overnight but all feel in deaf ears and money issues. Conclusion has to go back to how it was as there's no facilities for all the extra people boats and cars van

It is unthinkable that they would remain in the Mead Lane river stabilisation area. Where are the Warning Signs?

Rules must be enforced by CRT

I think that CRT should be responsible for policing any overstaying, as there have been many reports of boaters being abused or threatened by some Mead Lane residents and it is not their job to police river craft. The complaints regarding over-staying sit with CRT, but actually this does not affect Mead Lane residents, as if boats moved on every 14 days, they would quickly be replaced by other boats. I recently spoke to a boater who was abused by a local resident for overstaying. The river was unsafe to navigate due to flood water and she had also suffered a bereavement. Often boaters are given permission to overstay with good reason and that has nothing to do with people who live near moorings. At a recent meeting I suggested that boaters could meet with local residents, to explain some of the misconceptions of boating life eg assumptions that boaters somehow don't pay their way, rules about continuous cruising etc but I was reliably informed by the Julian House boater liaison worker that several attempts had been made to meet with residents and all of these had been declined. I think this is a shame, as it could build bridges

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

between the communities. . I assume traffic is the domain of B&NES council. As boaters pay a license fee already, I do not think they should pay extra for these moorings

NO charges, we already pay through our boat licence to moor for 14 days in any one place or longer periods etc, this would discourage boaters from staying and would put our community in danger, what would you say to the coroner if a death occurred in flood conditions? BaNES Council is very seriously concerned about students who fall into the Avon late at night after drinking, why are the council so unconcerned about the lives of boater families, adults, children, men, women, disabled boaters, older boaters? Are our lives worth less than 18-year old students? NO they are not!!! BaNES Council show that you care as much about the boating community as you do about the student community!

Enforcement should continue to be carried out by Canal & River Trust in the same way as it enforces time limits on other 14 day mooring space. There should be no charges, Canal & River Trust does not charge for any other 14 day moorings and payment of the boat licence fee already entitles boaters to moor free of charge for 14 days or longer if reasonable in any one place. In any case who would enforce or collect charges? The discredited, unaccountable and dodgy District Enforcement, who have been sacked by the Environment Agency and whose business model relies on bullying and intimidation, who do everything on the cheap to the extent that they have had cases dismissed by County Courts for failing to adhere to court procedure and directions? If enforcement is carried out by another public authority, please provide details of the empowerment trail up to primary legislation that entitles a public authority to collect such fees. Charging fees would be discriminatory, especially against disabled and older single women boaters who are typically on lower incomes and less able to pay and would thus breach the Equality Act. Charging would also create safety issues if boaters feared charges if they needed to overstay in a flood but set off due to the threat of excessive charges, resulting in potential loss of life, property and homes.

Allowing mooring to continue affords no consideration to local residents or those wishing to enjoy the amenity. The antisocial behaviour, damage to the environment and discharge of effluent into the river, not to mention the river bank, are health and safety issues which should be firmly addressed and enforced. Local residents who pay Council Tax deserve no less.

Any enforcements have to be managed including fines, any reservations should be charged and should be time limited including return visits, this is a leisure facility not a residential mooring, effluent should be managed elsewhere not into the river or onto the banks

Put in place regulations that allow overstayers to be fined. Use the council's civil enforcement team to enforce if overstaying becomes a problem.

The boats in general are good and bring a nice touch to the river bank, I can see why some of the older generation who have a property down there arnt so happy. But I'm sure they can afford to move house.

If rules are to be created they must be unforced. These should include preventing repeat offenders from mooring in this location

The whole enforcement process and traffic situation needs to be monitored constantly

Over the trial period B&NES has shown itself unwilling or incapable of managing this site in line with the trial period conditions. I have no confidence that B&NES members and officers will effectively manage any new system if boaters are allowed to moor at this site.

B&NES has shown itself as to be unwilling or incapable of actively managing this site. Despite being notified of boats exceeding their mooring period and depositing rubbish and other antisocial behaviour B&NES Council refused to take any action. I have no confidence that B&NES

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officers and Councillors will do any better in future. As a significant number of boaters have disused the facility I feel that a total ban on moorings i

totally impractical to carry out the above as it would take 24/7 to monitor and enforce properly with prohibitive costs

poor management likely to remain

A 48 hour mooring for boats travelling through is acceptable

Should be enforcement, no point having rules if they aren't enforced.

I don't know enough about these issues to comment sensibly.

Of most concern is the stability of the river bank and hence the road itself

I cannot think of ANY justification for moorings to remain at Mead Lane. There is a marina just upstream at The Shallows, another one just downstream at Broadmead, another one at Newbridge and another one at Keynsham. There is surely a limit to the capacity for a river to accommodate more than a certain number of moorings before the setting is spoilt for the majority of locals who simply wish to enjoy it and the wildlife it supports as a natural feature - an important element in the framework of green infrastructure .

Moorings cannot remain at Mead Lane without major rebuilding of the river bank which is impractical. BANES should relocate the mooring elsewhere on the river away from housing and restrict daytime parking to clearly defined sections of sensible width to avoid causing obstruction and prevent parking on the river bank. Overnight parking of vehicles should be stopped as it encourages Camper Vans to live in Mead Lane. Problems of litter, defecating, noise, drug abuse and dealing all grow out of this as has been seen as well a regular sightings of people in various states of undress.

As a pensioner with low income, I am very much against charging for mooring.

I would not have any faith in an enforcement and management regime of the area , it would be just be a " lip service " !

Charged and reservable for mooring more than 48 hrs. For less than 48 hours, a mix of free moorings and a few charged+reservable.

48 hrs max. moorings. Designated parking away from the bank.

Traffic management

If the moorings were to remain then it would be a good idea to have a reservation and charging system

A pay and display system is used in some locations around the country, give it some consideration perhaps?

BW need to follow their values of peace and tranquility!

encourage cars off the road except for access. Upgrade the pub which could do with a deep clean and spruce up!

Reservation charging system and more policing of the area

Reservation charging system and more policing of the area

Reservation charging system and more policing of the area

I have been an ex-councillor and find that there are too many committees etc. and very little action. Yet another survey. Please, please listen to the residents of Saltford, and especially Mead lane residents, who after all suffer! We know the river does not belong to them, everybody's rights have to be protected, but this issue has dragged on far too long - can there be a sensible solution.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Not a leading question! A few holiday short term moorings would be appropriate. It is a beautiful area with pubs and businesses that need trade. Enforce damage, litter, overstays through cctv.

No moorings

. The road would need better marking, and the river bank would need increased signage all of which will damage the amenity now provided by the riverside.

A couple of mooring points could be at the Spion Kop end. These let to known liveaboard boaters who work in Saltford area.

Introduce Reservation and Charges

Enforcement overstays and have charging system to regulate mooring stays

Two boats only £50 per day mooring charge.

regulate moorings and charged to more there

I do not support any future mooring as it has proven unmanageable quite apart from the apart from the damage caused there is a strong risk to the stability of the bank following the re - engineering of the Riverbank and roadway support in 2005 the associated long term risk to the roadway and access.

I don't believe that mooring in Mead Lane is an option in view of the need to protect the road from subsidence as is evident from the survey undertaken prior to the enforcement of the river bank and we have always been told by B&NES that they do not have the funds to provide 7 days a week 365 days a year to control and monitor the area and they have also advised us that they do not have the powers to enforce any controls.

Has to be strictly monitored, current free for all is not an option

The area would need to be closely policed to control number of boats and length of stay. Health and safety issues of management of human and animal waste. Noise.

N/A

To invest in full boating infrastructure, pontoons, waste disposal, water. No longer than 24 hour mooring and must be managed

This would be a huge mistake. I have covered the reasons above.

I'm not very familiar with such matters but it does seem to me that if there are restrictions to moorings then those rules need to be enforced actively. And if moorings are approved then there need to be adequate and safe facilities for the boat users.

If moorings remain, does that mean provision of toilet and waste facilities and water? Who would pay for this and monitor it?

Like to see the area kept tidy and safe for wildlife and people.

this stretch of the river is not suitable for moorings , no facilities.

Of course overstay and mess should be controlled but this seems beyond the capabilities of those responsible

more enforcement of keeping area around the boat being kept clean and tidy

Regulation should be required

If we cannot stop all moorings, then a charging system seems the best way forward

?

charge for use and provide chargeable waste facility

If moorings were to remain a charge should be made. And the council tax band decreased for those living on the other side of the road. This would compensate partially for the eyesore that some of the craft present and the congestion due to parked vehicles.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Moorings on the river should not be prohibited. However it needs to be controlled to prevent overstays and bad behaviour.

It would need "policing" which costs money

They shouldn't be able to overstay, they should respect the area and the neighbours and make use of the facilities at the marina

this would require an efficient but low cost "policing" system

Regular inspections should take place to ensure that mooring is not abused. There should also be guidelines regarding noise and parking restrictions should be enforced.

Introduce a charging system to regulate longer mooring stays and offer less of them. No 48 hour moorings. No parking on Mead Lane during the Summer months or introduce one sided parking only as flow of traffic through the Summer months is diabolical.

The moorings must not be allowed to remain, as they are a blot on the landscape of Mead Lane.

Moorings should be limited to 24 hours max ie allowing a visit to the Jolly Sailor only.

Boat owners are not keeping to the 48 hour or 14 day moorings because this is not enforced

Just do not allow moorings. You do not have sufficient enforcement people to manage and ensure moorings are sensible and not damaging the bank

Enforcement of littering laws, stop the cutting of trees for fire wood, fines for sewage pumping directly into river, enforcement of boat safety certificates & licences.

Def enforcement of overstays & possibly a charging system

Charging is essential so that people respect and value the moorings and do not overstay. I recognise that the practicalities of this could be difficult, so needs to be simple to operate perhaps with permits purchased at Post Office or a local pub.

If moorings have been seen as a problem, then just as for parking in a city centre, there needs to be a charging system. This should be enforced as for parking elsewhere. In addition, facilities such as waste disposal need to be provided to encourage keeping the banks uncluttered.

Parking wardens

Broadly agree

I don't know if the residents of the boats pay a council charge. I think they should have to clear their dirt and pay have the area cleaned.

Charging and fines for overstay I support, as revenue would pay for rubbish to be removed that is left along the riverbank.

It would not be in Saltfords interest to have moorings remain, I think as time went by it could slip back to an eyesore

I strongly want to see the option to moor removed

Stronger enforcement of moorings with penalties

Management would be impossible.

Impossible to enforce - there will always be those who ignore laws. See comments above.

I am not in favour of charging to use short term moorings on the waterways. No long term moorings should be allowed as the facilities are non-existent to support moorings.

I do not support mooring of any vessels on Mead Lane. If BANES were to overrule the views of those opposed, then it should enforce its own decisions and needlessly actually spend yet more of its sparse funds on enforcement, rather than make a decision then walk away.

No parking on the roads, the verges should not be used to store bicycles and other equipment from the narrow boats. The grass verges should be well maintained

Stringent monitoring and fines for overstaying

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Management on a spot check or regular basis will have to be introduced and paid for somehow - human behaviour is such that if there are no checks the rules will not be followed. I have not studied what management measures are most effective and would hope that there are other successful implementations around the country that can be drawn upon for the best solution here.

I cannot see any practical way for BANES to manage this, it will be a very low priority and enforcement would be a joke

Limited stays of moorings with enforcement on over stays.

Enforcement should always be a last resort. The danger with charging is that you penalise the poor

no overnight moorings.

I sincerely hope the current level of moorings doesn't stay; it's spoiling a naturally beautiful location & causes problems such as anti-social behaviour. If some - limited - mooring has to stay, then it should be severely restricted, charged and overstays penalised financially

Were this to be the case then a system of permanent management officials would need to be employed to monitor stays. This could however be a system where local retired persons could be utilised on a rota basis.

Employment of Water Bailiff(s) to enforce any legislation in the area, this could include mooring, parking and behaviour.

Employment of Water Bailiff(s) to enforce any legislation.

short stay moorings for passing holiday boats are fine but no long stay and mooring regulations must be enforced

I would suggest better liaison between BANES and CRT to ensure regular CRT enforcement checks to reduce overstays

It is the traffic on the road that I have more of an issue with. There should be one or two spaces to park on the road, but elsewhere double yellow giving people the opportunity to enjoy the river side.

I would support enforcement of overstay and traffic management on Mead Lane. If the only sure way of reducing moorings is a charging system I would support that too. Whatever it takes to improve the river for the majority

See above. In addition some charging system should be put in place so that people do not moor boats carelessly.

Not allowing cars/vans that are associated with the moorings to park alongside the boats as this prevents casual users of the river to park there - could some arrangement be made with the pubs to allow them to park in their carparks

I am wholly opposed to the idea. I saw no enforcement notices during the trial period or any authority monitoring behaviour of the people mooring along the bank at any time. The river is used by the sailing club and other sports groups for sailing and canoeing. Reducing the width of the river would not be appreciated by them I'm sure. There would need to be a facility for users to dispose of rubbish. Another eye sore.

Car speeds are often dangerous for walkers, particularly at the choke point where there is a single lane. 20mph would be good for walkers and boat residents.

Burning of rubbish in fire with boats heating

Restrict mooring to a small area and set maximum of 48 hours with strong enforcement of overstays. Charging for mooring is probably too complicated to manage.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

I do not support this as it would increase the pressures on the council regarding collection fees etc.

Charge proper money for mooring to deter the wrong kind of people.

no long term moorings.----- It ruins the Habitat, the Beauty & Atmosphere of the village

Regulate the area

I can not think of any reason to allow any moorings here, it should be left free space for everyone to enjoy

Local residents to monitor boat stays and make dated photographic records of overstays

THE MOORINGS SHOULD NOT REMAIN, which would remove the associated problems and restore the riverbank and area to a natural beauty that may then be enjoyed by residents and non-impactful visitors.

If there were no moorings, the council officers could spend their time doing more important things like stopping flytippers

Because of the narrow river bank, any moorings, especially the boards ropes etc, disfigure the landscape, whether they are permanent or holiday moorings

Short stay moorings would need to be managed, in particular overflow from boats to riverside should be eliminated

policing of mooring overstays is obviously difficult. Perhaps reservation and charging is the least worst option cars obviously need access to Jolly Sailor. short stay of cars to watch the boating club is perhaps to permissible.

obviously need access to Jolly Sailor

Traffic management and enforcement of moorings is key. If that can not be promised then no moorings please

Regular checks on mooring times

Strict enforcement necessary, introduction of a charge would help.

I do not support the moorings continuing but in an unfortunate remain situation I would require strong enforcement of the rules.

Should be mainly 48 hour moorings with few 14 days and strong enforcement and provision of accessible waste disposal

Charging system

Overstays must be enforced with large fines

i don't think that that stretch of riverbank is suitable for moorings and that part of the river should be left for the yacht club to use. I would support the Parish Council's proposal for a local nature reserve to be created to include the riverbank

There should be NO moorings leave nature as it was intended. Nature will make all the changes naturally.

3 day maximum moorings allowed

More 48 hour moorings would be easier to manage , A reservation system, perhaps with a charge, could be possible

No river bank parking of vehicles because of the hazard to pedestrians. Installation of seating/benches along the bank particularly for pedestrians with mobility problems. Vehicles have difficulty passing each other in the lane which can be dangerous for pedestrians

Prevention of mooring occupants possessions littering the river bank. Tight control over all types of waste from mooring vessels. Grey, litter and excrement.

Stronger management of Mead lane is required

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Enforcement would cost us money and how would any fines be collected ? river police!

No moorings to be permitted. My son's were members of the Scouts in the 90's and regularly had river kayak/raft activities on this part of the River Avon. It would not be a safe place for these activities now due to pollution risk.

Would need to be limited mooring. Reduced traffic - only for residents and businesses.

They must be monitored. No overstaying, no double berthing, no ropes around trees, no litter etc

The rules should be followed and enforced!

Would like to see no cars or boats moored

The unspoiled views from Mead Lane to Kelston Round Top and the start of the Cotswold Way are one of the great sights of Saltford and a precious recourse it should be a special place of peace and tranquility and nature not despoiled by mooring at this open spot of the river. Generations have taken their children here to a picture book river environment walk and I hate what it has become, a Boat Parking Lot.

KEEP THE AREA AS NATURAL AS POSSIBLE BY LIMITING THE MOORINGS

I have nil confidence that the area will be managed. Other mooring areas are not and many are eyesores

I think there should be limited moorings and they should not be informal and therefore pay which would reduce the amount of people using Mead Lane, this would allow for more wildlife to move in. I think a nominal fee to enter could be a consideration but for residents it should be free entry.

A warden

If the mooring are allowed to continue there will soon be an accident involving walkers or cyclists due to the congestion on an already crowded lane

All the vans parked up

Mooring should be limited to 4 as no facilities and some sort of charge introduced and be

See above

No longer than 24hour stays + some facilities for mooring

No moorings preferred

If moorings are to continue, a sewage disposal point and fresh water point should be installed, as its possible that currently waste water is discharged straight into the river, which is not acceptable. I think parking on the verge should be controlled, possibly banned.

I will wait and see but I look forward to the project

Ban cars parking on mead lane or limit to 2 hours

Parking restrictions to stop vans and cars parking next to boats further damaging the riverbank.

Very Strict enforcement of overstays. Penalties for rubbish dumped on riverbank

They must not remain unless there is a wish for a normally peaceful residential location to become a battleground. Feelings are running high.

Reservations for narrow boat holiday makers. Parking restrictions along river side of road. Possibly have parking allowed at weekends. Unannounced checks on overstays. Joint Neighbourhood Watch type group involving e.g. boater organisations/residents/canal and waterways trust group if moorings of longer than 48 hours permitted.

Double yellow lines. Enforcement cameras

Mead Lane could very rapidly become a local nature reserve that provides the additional benefit of easy access for observing and learning about riverside wildlife habitat whilst remaining a local beauty spot and area for leisure. This is not about stigmatising boaters, the majority do of course operate and moor their boats within the law, but rescuing Saltford's riverbank at Mead Lane from

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

abuse by a minority and protecting the wildlife and this iconic location for the benefit of the majority, a mooring ban should be implemented without delay, commencing with an immediate winter mooring ban.

The current rules are being abused because they are not policed. Any new system would need to include monitoring, either a patrolman or cctv could work.

lack of management has caused current issues so no confidence that any future management would work

I think boats should not be allowed to overstay and this should be enforced. There are rules and restrictions on life everywhere, we give out parking fines for parking too long in one place, why should it be different along a beautiful stretch of river which many people should have access to.

Any mooring policy needs to be overseen - and enforced!!!

I don't support moorings on Mead Lane. It is too restrictive generally to support any increase in usage. Car parking has become a significant issue. I can't imagine effective management of the situation being practically implemented

Don't support any moorings, if implemented there should be control of parking, strict enforcement of overstays and a charging system. I question how these aspects will be enforced and suspect that staff will have to be hired which, in turn, will not be welcomed as it will increase the costs to the ratepayer.

I'd like to see speed humps introduced, and a toll system put into a place on the way OUT of mead lane towards Saltford - where residents have a pass, and jolly sailor patrons given a pass at the pub, other people using the road should pay on the way out.

Enforcement of overstays; no parking on the grass verges; no belongings left on the grass verges

I do not wish the moorings to remain, as they would be abused. I would like a local nature reserve to be established, instead.

There appears to be no current management to enforce mooring regulations and unsociable Behaviour.

I'm personally worried about damage to the ecosystems along the riverbank, boat moorings often clear areas of bank and fragment the riverbank. If they were to remain enforcement would have to be implemented, at the moment nothing is done and people decide not to abide by the signs as there is no repercussions. Traffic management, possibly no overnight parking would be worth looking at. Only had issues since the signs went up as an invitation to Moor, with a charging system that too has the same affect, and without enforcement the issue of overstayers and non payers will occur.

In my view the moorings should never have been allowed, and if they continue further problems will occur.

I am not against barge mooring. I am against slum development on mead lane.

Higher management of overstaying and litter, noise and parking which are the main issues

Sadly I don't know how enforcement of over stays and illegal mooring can be tackled unless there is a regular patrol system for the stretch of river, but who would control it and pay for it? Wish there was an answer as it is a huge problem.

There are very few places to moor on the river and reducing further would cause more issues. Maybe a better system could be implemented to reserve spots or monitor overstays but how it would be implemented fairly I don't know. I don't believe charging is the answer

knowing nothing about what system is already in place I would opt to leaving it as it already is as it appears to work.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

I am completely in favour of charging those who overstay with warning. But please do not take away these beautiful moorings.

Moorings periods must be enforced and charges made for 14day moorings

If charges were brought in, this would result in more boat sinkings as people who couldn't afford to pay would be forced to moor in more dangerous places, and those are often the people with the smaller boats with less powerful engines. Enforcement should be carried out by CaRT, according to the waterways acts as they do all over their waterways, no-one else should be taking enforcement action here.

Moorings and parking must be managed properly and on a daily basis. At present no one seems responsible for management and any rules there are are being blatantly ignored, including damage to the banks and posts put in to prevent this.

As a boater I would like to keep the moorings, I think if boaters are respectful the neighbours won't mind them to be there. Because of what happened before I would add some signs that says that is completely forbidden to leave any rubbish or items on the river bank and add a phone number to ring BANES if we see something inappropriate. I'm a boater but I don't approve other boaters behaviours, I'm a respectful person, with nature/environment and neighbours, and I don't think I have to loose the right to moore at mead lane because of other people previous behaviour... I think we should work all togheter to keep the boats there, we are part of the community and can't be just all refused because of some...

The overnight stays are not managed correctly and there is too much unsocial behaviour and litter spoiling the area

less moorings and double yellow lines for parking

Ensuring that people do not overstay their time on the river bank. A time limit for parking along mead lane would also assist

If the moorings are kept limit it 72 hours

You could give it to the Canals and River Trust and allow one space at the first bit (Bird In Hand) end. And make the rest a nature reserve except for a small number of fishing pegs.

Lots of people do manage to live aboard boats, without permanent Moorings's, without overstating on managed moorings. I don't see anything wrong in charging for overstays especially after bust owners have had some kind of warning.

If the moorings were to made permanent then the council would have to invest in the necessary infrastructure needed to ensure the Laneway is safe for pedestrians and residents. The council would have and to provide additional parking and the associated regulation, waste management sytems, water and sanitray considerations. The laneway may need to be widened to allow for the additional parking and to allow pedestrians safe access along the laneway.

Enforce the rules everyone happy except the selfish ones

More enforcement of over stays and charging system

A few moorings could be in this area with a reservation system

introduction of a reservation/charging system to regulate mooring stays. Only being allowed 2 nights at most

This needs to be looked at carefully as the residents should not be expected to manage the moorings

I don't ithnk it is viable to continue mooring. A 'softly softly' system has failed completely; there are not the resources for patrolling, enforcement and punishment sufficient to act as a deterrent to the breaking of mooring guidelines; thev presenence o so many boats (one user group) is completely at odds with the legitimite rights of most other user groups. Because of the raod this

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stretch of the river is (was) highly accessible to old, young, disabled etc. people. This is no longer so in the summer. If there is a need for mooring, then proper facilities should be constructed, away from Mead Lane, that do not impinge on other river-users' options

We hope that the opportunity will be taken to improve the current area as a Local Nature Reserve and think this is incompatible with moorings being provided.

There does need to be regular enforcement for those on the boats to move on after 14 days.

Traffic calming measures to ensure householders, people on the boats keep their speed down

A weekly check (like in the canals) might help with the overstaying...also if there were any other 14 day moorings on the river that would help too. Also some kind of mediation between boaters and residents if that's possible?

Mediation and education with regard to any conflict of interest over the moorings and the need for content cruising vessels to have an accessible place to moor in the rivet

Very strict enforcement of any rules needed, but the last couple of years has shown this is unlikely to happen.

a recycling bins collection area could be built to allow people to dispose of their waste ethically

less road traffic very much restricted mooring

No moorings

See above for charging. Employ a Mead Lane resident on a commission basis to collect rental charges, they could also report boats with out of date licences, of which there usually many. An on the spot fine for licenses and collection of mooring fees. This is my second report as a result of discussing the situation with others.

Wouldn't work system is already abused by boaters

I do not believe it would be possible to effectively manage this area fo boats to moor. Any mooring use would be abused and the Council would not be able to effectively control or move on boats overstaying. The boats are effectively people's homes. mooring use would be abused and it would not be possible for the Council to effectively enforce any rules

I do not believe it would be possible to effectively manage this area fo boats to moor. Any mooring use would be abused and it would not be possible for the Council to effectively enforce any rules

One or two boats for one day only and the council parking wardens checkinget every day and fines for overstaying

Dont want the moorings to remain. Unless there are a couple for leisure boats with say 24 hour restriction which is properly enforced.

you will not enforce as you will not have the money/staff, so best not to have moorings, then you will not have to worry about it.

Enforcement of overstate is ok but where do the live aboard go as everywhere they go they seem to be moved on! Something must be done to reduce excessive speed by some vehicles who I estimate as driving up to 40mph! As for charges, charges, for what? It is the fishermen who damage the banks by digging platforms to sit nearer the water plus some boaters who exceed the 4mph limit. If the banks are kept in good repair with grass cut regularly it will generally stay that way. As for the billiards replace with metal one spaced closer together

Supervision and enforcement would be expensive and is untenable.

It ain't broke so no fixing necessary, but almost all altercations i've witnessed here or anywhere in the country have been when local residents get to telling boaters what they feel they can and can't do

The moorings from Newbridge lock to Saltford are illegal so this question is irrelvant.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Live on boats regularly overstay the maximum permitted. Boat owners are not open to discussion about any issues concerning their length of stay and can be abusive if tackled.

Currently, traffic makes the lane dangerous for families with children and I'd really like to see the traffic carefully regulated or restricted.

Enforcement of overstays

should all be regulated visitor mooring to give more people the chance to see the local countryside

Ask Wessex water they had to wake them up to move cars and vans to get trucks in to Wessex water

Please see comments above. In addition currently there are no facilities such as water and sewage disposal points to serve the boats. There is little space for these facilities and it may prove difficult to provide such facilities.

If the moorings were to stay, there needs to be policing of the area and people that use them.

Drugs, dogs and mess isn't something visitors want to see. It's kept us away.

Moorings in this area will cause a negative affect to the quite, natural beauty that we all regularly enjoy.

Traffic management isn't a result of overstaying, reservation, charging just adds to the administrative burden and costs, the management is fine as is, the moorings should be managed with a soft touch, these are people's homes, the problem is people who feel entitled to influence land that isn't theirs, your house stops at your boundary!

It's a beautiful river with lots of boats to be intrigued by. Absolutely stunning place with the country side to walk and view at your finger tips.

The overstays must be strongly enforced, the car parks in B&NES are!

enforcement of overstays

Use the same system and management as applied to the rest of the UK network under CRT control

Install CCTV cameras to provide incontrovertible evidence,

The moorings should remain free of charge, consistently with the public right of navigation which includes stating that no payment is due to landowner. There's no need to revisit the biased proposals for vehicle parking restrictions which were proved to be contrary to the Equality Act. The management is fine at the moment, Canal and River Trust are the body that can lawfully enforce the British Waterways Act 1995 and no other body can do so; overstays are enforced the same as everywhere else on their waters. Charging for mooring would disadvantage an already disadvantaged group of people. This survey is biased towards increasing the 48 hour mooring section and reducing the 14 day, and similarly biased to removing mooring altogether with only 1 option to favour more 14 days space, 2 options to increase 48 hour space and 2 options to ban mooring. How will this be analysed? People have double the opportunities to favour reducing 14 days or banning mooring. This is highly questionable and some sort of weighting should be used to rectify this bias. Who designed this survey and who had input into it? The residents of Mead Lane? Saltford Parish Council? Saltford environment group? The local BANES councillor for Saltford? Its appalling. Please rectify this bias. Please record my answers twice to remedy this bias.

No long stays, allow spaces between boats to allow access to all from riverbank, stricter hygiene/litter/pollution policy

24 hour only on 1 or 2 spaces and area to be managed and enforced by the council

24 hours only for leisure and only 1 or 2 spaces at moorings to be properly managed and enforced

It's a CRT problem that overstayers need to be reported to them, also a rubbish area and chemical toilet block close by would help boaters not be so messy when a lot of them don't drive so need to put things on the bank whilst moored up!

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

crt TO BE MORE ACTIVE

I firmly believe that the mooring rules should be enforced.

I think that the current mooring arrangements are fine, but they need to be better enforced. Either by CRT or the council, or both. If enforcement is not possible, then changing the mooring restrictions will change nothing, and changing the restrictions might be unnecessary if the current restrictions are enforced and shown to work. A booking siren might work, but it would still require on the ground enforcement. There are very few visitor moorings on the river whereas there are plenty of other sections of river bank which could be improved for wildlife. The boats on Mead Lane are a unique attraction for many walkers and visitors who bring money into local businesses as well as adding to the character and diversity of the village.

Enforcement would need to be rigorous, it would be expensive and rarely works.

I support the proposal of the creation of a local nature reserve in this zone

Definitely in favour of some form of charging system and reducing turnover of boats (Greater 14 day mooring, potentially eliminate 48 hour mooring). Installation of CCTV as suggested previously may be an option.

Overstaying boats should be reprimanded so the moorings are fairly accessible to all boats. Residents should have some official restrictions in interfering with/ harassing the boaters and causing upset. It is extremely anti-social. Boaters already pay a license so should not have to pay to moor.

Enforce the following rules. Maximum stay 14 days. No generators after 6pm. Absolutely no project work to be carried out on boats at all. No personal belongings to be left on the riverbank. You could say no parking on the lane at all by either residents or boaters.

only short stay mooring allowed, areas for fishing to be free from moorings with parking allowed for limited times

We pay a licence fee to CRT, it is up to them to enforce the moorings in the usual way. Not down to residents to report. That is bullying. How about you install a charging system for the residents of Mead Lane for every time they want to look at the river? It amounts to the same thing. Both are using/living in the space.

I think an hours long system would be better, as I said previously, genuine boaters can have time to enjoy the area, have a walk, cycle or enjoy a meal in the local pub. It would deter those that didn't really have any interest in the area, but just use it because they think they can get away with overstaying their welcome.

charging won't help anything, regular checks & using CRT or local bye laws to enforce overstays would mitigate current problems

No experience of how moorings are managed but the access for traffic could be better. Perhaps a one way loop?

It is my belief that the area should be managed like any other public space. The needs of the people that use it should be taken into account with equal importance. It is essential that people that choose to live on the river should have no less importance than land owners. Littering and anti social behaviour should of course be discouraged and dealt with intelligently but under no circumstance should these unfortunate realities be used as an excuse to remove essential moorings that the river community depend on.

Perhaps the crt need to do some work. Also not many people mooring there are able to take their car as well so perhaps that a house residents issue.

I think it is well managed

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Once a week, the moorings should be walked by a mooring Officer (similar to CRT), who will note all of the boats registration numbers. If the boat is there on a third visit, it receives a fine unless it has registered a legitimate reason for staying. clear rules should be posted about items being stored on board, with exception being made for tables/ chairs etc

In my experience boaters are respectful of the time limitations and enjoy a shared spot for all to enjoy and I believe many feel it is a quaint and heartfelt sight to see the boats moored there also works well as it is!

The current system is fine - just the odd instance of friction between house dwellers and boaters. More consultations and meetings between the two parties would assist.

It is unfair and out of order for the very people who detest boaters to be recording information and monitor moorings. All informations put forward should be NULL and VOID. There has been examples where residents have been abusive towards boaters, have over exaggerated claims as well as setting boaters up, (eg - placing their own rubbish outside boaters home and photographing it) by no means are some residents innocent in this situation, and have gone out of their way to intentionally exasperate things. A major issue that has caused problems is that CRT, the environment agency or BANES do not monitor the moorings, this has left Mead lane open to abuse to a minority of boaters who think they are not on the radar anymore. (it should also be noted the CRT have contributed to this problem by constantly changing the rules and forcing people to move further or have their licences taken away) I am not saying there has been no issues, I agree that antisocial behaviour should be dealt with (same for residents antisocial behaviour) This is deeply unfair to law abiding respectable boaters who operate within the rules (a vast majority) As a result of the lack of monitoring by an official party, a great deal of tension has built up between both parties. The solution to this problem is to have an official authority to monitor the moorings like the canal is monitored. Its important to remind anti boater home owners, that the river was here long before their homes were built. Perhaps they should move to a place that is more suited to their bigoted views. This includes not moving next to a pub if they do not like the noise from a pub and not near an airport if they do not like planes. Having an expensive home does not give people the right to dictate who does and does not lives near their homes. Some Mead lane residents are people who have made a judgement on how boaters live their life. Stereotypes include boaters not having jobs, throwing human waste in the river and being thieves. The boating community include a diverse range of people from all backgrounds, rich and poor. Teachers, nurses, engineers, librarians, care workers, artists, craftspeople are just a few of the people who live on their boats. Another issue that isnt taken into account, Saltford is commonly known as saltford beach and is a very popular spot for all, dog walkers, swimmers, kayakers and paddle boarders, fishermen, walkers, families, it is well known the summer is busy here. it always has been. People come from miles around to swim here, drink in the pubs, walk their dogs etc. Some of the issues encountered by locals are not boater related, but related to a whole selection of visitors, rubbish, cars, dog fouling etc The solution to this is not to stop boaters mooring here. If legal mooring is stopped, law abiding boaters will not come and the problem will be made worse by the minority who dont give a damn and cause more problems. It is noted that this survey sways in favour of residents, yet again another tactic to get rid of boaters.

BANES COUNCIL MUST MONITOR THE MOORINGS , AND NOT AGRUE THEY HAVE NO MONEY , OR NO MOORINGS AT ALL

Everyone come to a mutual agreement

The council would have to look into their own funds and the law to see what it's possible to enforce. Allowances would have to be made for when boats are broken down, it's unsafe to travel, someone is unwell etc. The council could seek advice off CRT. The residents must not be

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involved in the monitoring or policing as they are I'll informed, rude and prejudice and do not understand the law around the subject. Boaters are only a fraction of the cars parked there, I've seen 6 cars and lorries outside one resident's home who was getting work done. If boaters need to overstay on the canal they have to ring crt to explain why.

Boaters already pay an annual licence to be on the waterways so I don't think charging should be introduced. Reservations - maybe?

The moorings should NOT remain

Immediate fines on overstays and a charging system

Bins for boater use, and maybe someone looking after that stretch of river- peace keeper between both sides and making sure everyone do what they mean to

Why is it such a big deal if someone stays somewhere a bit longer? Who is it hurting? I don't know why the residents are so worried about what's happening in someone else's back garden.

CRT have an enforcement system on the canal, why not the river as well?

More facilities like refuse disposal & elsan/water points

More facilities for boaters and a bit of understanding from both side. there is no need to create antagonisms. the press and the politicians are already doing enough to their advantage.

Have CRT or similar do a simple check once a week and enforce as they do across the rest of the country. No reservations, no charging.

Moorings should be free as boat dwellers already pay licence fees to be Inthe waterways and welfare facilities should be introduced. There is potential to develop the local economy through provisions shops and a visitor education center. The banks and local ecology should be maintained with a view for conservation, both ecological and cultural. People should not overstay on moorings and this should be subject to regular checks by CRT as is the case throughout the country.

I do not have any prejudice to boating community; they are peaceful and lovely to chat to on walks. I understand that moving them along too regularly makes it difficult for getting their children to school/ work. Happy to share space.

Please designate the area as a local nature reserve, reduce the number of moorings and place the limited moorings under the control of those managing the nature reserve. Moorings would be subject to conditions to conserve wildlife on the banks (e.g designated mooring points at more widely spaced intervals, not cutting bankside vegetation, restrictions on use of generators etc, movement to avoid erosion). Mooring charges would be appropriate but could go to funding management of the LNR. These conditions should be monitored by wardens attached to the LNR and would help encourage a culture of community responsibility among the boaters as non compliance could lead to eviction. There are plenty of examples where Local Nature Reserves and moorings have been successfully integrated, from Camley Street in London to Pinkhill Meadows in Oxfordshire. The success has been in having the tenure of the mooring conditional on ecologically sensitive behaviour. If the moorings are to remain it would be sensible to establish an emptying point for compost toilets (if not chemical ones) as well as marked parking bays

If you overstay on the canal, CRT immediately send an email to inform you, does their sighting system not cover the river?

My understanding is that crt manage this more than adequately. The policing of moorings is religiously applied.

Just get rid of the moorings to make the place safe.

Very strong enforcement

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Those who do not want to abuse the system will be happy with any enforcement. I believe it should be enforced, there are not the facilities for long term moorings. Installing facilities would not be fair to residents so it should only be enforced short term moorings for leisure use

License fee should be all canal boaters pay. The right to moor for 14 days is enshrined in law

Most boaters do not overstay buy we are unfortunately labelled with the minority that do on occasion. The residents are unreasonable about parking - I was recently moored there and a family with a baby moored in front of me were consistently harassed by local residents claiming they were blocking their driveway. They had adequate space to enter and exit their driveway but clearly thought they owned the road

Current mooring signage is clear and adequate. Possibly more information about local wildlife

Overstays should be allowed if there is good reason otherwise people should move on to allow others a chance to moor here. Traffic will always be an issue but perhaps a nominally increased parking charge would help fund any extra infrastructure needed.

It's simple. The council need to manage it, placing overstays, maintaining the riverbank and providing facilities that ensure the area is kept clean. The council mismanagement is responsible for this and the NIMBY residents should be ashamed of the way they have behaved.

I think boats mooring there should pay via meters or online for the duration of their stay a bit like car parks

No one is enforcing anything and I don't see this changing! When asked to move on boat owners claim that their engines are flooded and they cant move - most have absolutely no intention of obeying any rules and know nothing is ever done

Not sure

put bins and a water point

Over stays are managed by CRT not the council, as stated before most boater do not overstay, personal reasons or engine problems sometimes make this a necessity but communication with the boater and CRT occurs and it is nothing to do with anyone else, residents noting times and dates and wanting everyone to have big boat names displayed is nothing but prejudice and self-policing of an area that they view as their alone. Traffic management us the same as anywhere else and not up to the residents, swimmers in the summer and fishermen are the main culprits of parking along the riverbank, boaters know to use the laybys as we do everywhere else on the waterways. Reservations are a ridiculous idea as noone knows how long a cruising day will be or how far you can get due to weather, other boaters, broken locks etc. We choose to continously cruise to avoid mooring fees, why should we have to pay for and reserve a spot here?

Sensible, progressive solution to everyday issues.

No charging, please! We do not own a car, so not involved in Mead Lane traffic. Enough mooring spaces will mean people won't overstay.

Daily checks and extra enforcement, double yellow lines the length of the lane

CRT should enforce overstays, and take action, and residents if need be can help monitor this

If moorings were to remain, this could not include parking their vehicles as there is no parking facility. There are no facilities at all for long-term mooring. So the time would have to be restricted and enforced to 48 hours except for those that own land and have riparian rights to the riverbank. Parking should be banned except for day visitors like fishermen who could be given a parking permit, this would need to be enforced.

You could introduce a "check in" system for each move with gps maybe? the rules are already quite difficult for families and others who maintain employment. The river is an invaluable

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resource for alternative living and people need to be supported not penalised when guidelines on distances are changed with little notice.

Monitor length of stay, but allow extra long stays for special unforeseen problems, these are real people

I would suggest pontoons for the boats. Also make the Shallows a local nature reserve, its more suitable than Mead Lane

I strongly agree for the free unreserved moorings to remain. I believe there should be recycling facilities for boats. I believe there should be a fishing ban in the area.

The problems with rubbish can be resolved by providing improved disposal facilities. Developing community events with boaters and housed residents to care for the land can be a really good way of breaking down prejudices whilst ensuring management of the land.

Enforce. For everyone's sake.

Needs to be regulated so the mooring is available for more visitors to enjoy

Unfortunately enforcement means charging. Victoria Park car parking can be done by text, surly morning can?

Definitely needs more enforcement for those who abuse and overstay with running for the rest of us who play by the rules.

The boaters have not complied with the mooring rules in the past 3 years so therefore will not in the future and a boater had been heard to say this openly in the local pub.

In my experience, river users have always been very respectful and generally considerate of timings and not overstaying. I'd perhaps rather not see extra red tape or procedure, if it's necessary to reassure people of the moorings correct and respectful usage though that would be fine I suppose.

Have a word on

If sufficient services are provided for mooring then a small charge would be acceptable but ideally moorings should remain accessible to all regardless of financial status

I would want any vehicle access to be restricted (i.e. parking restrictions on river-side) e.g. no overnight parking.

If they stay then mooring should be charged at a rate to cover the cost of a team to visit site daily to check for dog fouling, litter dropping etc

I am nervous when walking past some of the boats as i feel a little exposed in this quiet location

I strongly disagree with mooring charges. We already pay a licence to use and moor on the river. Residents not taking it upon themselves to police the boaters. CRT or environment agency need to do that so perhaps they need to have more of a presence to ensure boaters don't over stay. Instead of doing away with the moorings all together, those that abuse them need to be dealt with by CRT. Traffic is fine. It's not just boaters who park along there.

Regular monitoring by canal river trust and enforcement as per canal

CRT should be entirely responsible for waste and services, alternatively you could install and charge for these. A 'pump out machine' can be run each time for £20 whilst costing a fraction of that

I THINK THE RESIDENTS WILL BE AT WAR WITH THE BOATERS

I feel the current system is working. I often walk the route in addition to our visits by boat and it seems present there is sometimes a little rubbish in the summer months so maybe some more bins or someone sent to litter pick I always collect what I can if its particularly bad. I doubt this has any thing to do with the boaters though as a trip along the canal to a part thats popular with boaters but not fishmen or summer revellers will show that were not littering scum.

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Send the crt down more often to make sure everything is okay. The crt should be representing the boaters and making sure the residents are happy

I would suggest that the moorings are checked daily to ensure overstays are not an issue. I have never experienced a problem with parking at Mead Lane, however a designated turning spot may need to be introduced. The mooring should remain free - people pay for their river license. Information regarding boat dwellers, their rights and their contribution to the upkeep of the river and environment should be made clear to non-boat owners (maybe a sign could be erected about the CRT and make clear that all boat dwellers contribute to this)

Additional resources would be needed to patrol the area on a daily basis and fines for overstays would need costly administration so this is a strong reason to remove the moorings altogether as the council would not have the money to fund these measures.

Parking is always an issue, as, sadly, is boat overstaying. I would support increased parking controls (boaters are happy to walk to reach their cars). Perhaps also a system of reporting boats arrival times, like the clock on dashboard system used in many foreign countries?

Have a rep from CRT come and check boats and regulate them in the normal way. The problem is not anything that is particularly happening there with boaters it feels, but with other residents and visitors and the impression they have

The residents over exaggerate the issues and this needs to stop. We are all just people trying to live our lives. Some compassion and empathy would be nice.

Send a crt member once a week. Not all boaters abuse the system, they are as much a thorn in our sides as those who live there.

Over night mooring limited to 8

Independent as parish council are bias against the people and there lifestyles

It is a natutal place that has already been distrurbed by houses built that are not environmentally friendly. It is not necessary to turn it into an unpleasant monitored urban area.

Don't ask residents to do it !!!!!!!

enforcement of overstays, reservations esential and limited to 24 hours

If the moorings were to remain, the situation would stay just as it is now, unacceptable. BNES Council has never enforced the mooring (lack of money) and the boats know it, so they overstay. The Canal & River Trust don't do anything either unless a boat has no licence. So discussing future enforcement issues or reservation / charging is a non-starter. The Council won't do it. It is better to have no mooring at all, re-wild the banks and have the Council maintain the banks for day trippers and fishermen. There should also be no overnight parking.

I don't think I know enough about the options to give an informed view. I think boat owners being respectful of the community and htherefore minimising their stay and their impact would be a good form of payment. I suspect if you lived in mead lane and were paying high levels of council tax you might feel differently.

needs to be managed daily

B&NES Council have never moniitored or enforced the current 14 day / 48 hours mooring scheme, presumably because of a lack of financial / personnel resources. It is therefore unlikely they will find the resources to make any future mooring scheme work. Traffic management might be improved by a judicious mix of white and yellow lines, maybe double lines in a few places. In a previous consultation about parking on Mead Lane it finally came down to a vote and residents were out-voted by non-resident boaters, so no parking scheme was introduced. If B&NES wanted to introduce a reservation or charging scheme, I feel that they would have to provide some basic

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facilities, toilets for example. Cash and staff would be required to build and support any such facilities, and there is very little space available here.

The fact is that resources are so tight that no enforcement would take place

1: Regulate and enforce regulations strictly. 2: Apply appropriate Charges 3: Deal with complaints swiftly 4: Ensure boats appropriately licenced

To ban moorings here altogether would save BANES considerably

They should not remain but if they do against the vast majority how likely is it they will be checked every day ? Yes I'm biased as an angler but when my disabled wife was alive we loved to sit there for for an hour or two as did many others just to pass the time of day, it is a beautiful area and with marinas at Keynsham, Saltford and Newbridge with facilities there is no need for boats to moor there and the proximity of 2 pubs is not a good situation.

In reality, given the lack of resources, we know there will be no effective management of this area. The only sustainable option is to ban all moorings AND divert the heavy traffic that uses Mead Lane. Currently the combination of river moorings and traffic is desecrating this stretch of the river.

Short term stays only (24hrs)

Possible option if it can be policed!

Why charge?

Réservation system

They shouldn't stay they should pay for a Mooring like other people do

Policing by a local body, maybe sailing club with link to the local police, introduction of more wooden posts to discourage parking on the grass verge and no more than 48 hours stay.

24 hour stay and regular enforcement

Active management and enforcement of mooring policy.

If moorings were to remain, against the wishes of the majority of residents in Saltford, moorings would require daily management, monitoring and enforcement of mooring practices but with a mooring duration limit of no longer than 24 hours (i.e. overnight for boats passing through) in a reduced length of the riverbank with proper yet inconspicuous embankments/pontoons installed to protect the riverbank's vegetation. Winter mooring should be banned (unsafe). After the first 24 hours is free, thereafter a high charge should be made for any further nights within the same week. Residents should not need or be asked again to monitor moorings as this has caused friction between boaters who object to residents protecting their local riverbank; this should be B&NES Council or a sub-contracted agency. However, Mead Lane is simply not suitable for the mooring of boats as the mooring trial has so clearly demonstrated.

I don't believe that it could/would be economically enforced. It might mitigate the long term damage to this sensitive habitat, but wouldn't protect or restore it.

Moorings on a riverbank alongside a narrow residential lane need to be properly planned through the planning process; there has been no formal planning application from B&NES Council to create moorings at such a sensitive location in the Green Belt as Mead Lane. The combined issue of availability and demand or need for free or chargeable moorings on the River Avon is a different issue to whether Mead Lane is suitable for moorings, which B&NES Council as the riparian owner has proved it is not and that it lacks the resources to properly manage and enforce any moorings there. As a result of the mooring trial, SEG reluctantly concludes that moorings should not be permitted in Mead Lane and should be stopped as soon as possible so that the environment of this rural lane can be returned to its more natural state of a healthy, unspoilt riverbank where wildlife can thrive and members of the general public can appreciate nature and enjoy again. For

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safety reasons a winter mooring ban should commence forthwith as the river here is dangerous at times from autumn through winter into spring due to the seasonal high level and strong river currents and also the associated flood risks that arise with increasing frequency. The mooring trial has been stressful for local residents and had a highly detrimental effect on the lane and the riverbank's flora and fauna whilst acting as a deterrent for members of the general public to visit the lane in the summer season. The absence of mooring enforcement and mooring management on a daily basis at such a sensitive location has resulted in an intolerable situation for our members, many of whom have reduced or stopped altogether their visits on foot or by bike to the lane in the spring and summer months. The mooring trial has proven that this residential lane at such an iconic and beautiful location that should be available for the general public to enjoy is not suitable for the mooring of boats; to suggest otherwise is to ignore the evidence collated by local residents and as witnessed by other lane and river users including many of SEG's membership. The white lining should be replaced and updated to protect and keep open access for residents, visitors, Wessex Water and emergency vehicles. Overnight sleeping in vehicles or caravans is not at all appropriate in this narrow residential public lane and should be banned. SEG therefore agrees and supports the policy response statement to this consultation agreed by Saltford Parish Council on 1 October 2019.

the area would need to be secured and policed as there's too much anti-social behaviour / litter
Strict enforcement of overstays is essential if the current moorings are to remain, but I do not believe this is necessary, given the number of marinas and other moorings in this area. I would much prefer to see it left as an area of natural beauty, allowing an increase in the local flora and fauna to be encouraged.

I would not be opposed to a reservation/charging system to regulate mooring stays if that it what it took to save this mooring spot.

The mornings should be managed by CRT and boat sightings logged by them, and enforcement procedures applied by them in line with the law. This is how they manage other areas of the canal. I strongly disagree with a charging system.

I would like to see expensive management kept to the minimum. Engaging more with boaters to encourage self regulation with increased moorings

I believe that Canal and River Trust are competent to manage mooring use.

Not necessary. This is already covered by EA and CRT rules. This is nonsense to placate wealthy house owners.

Vigorously against any move to reduce moorings and boat use on the waterway system. Also anything that reduces use such as charging. The character of the system is dependant on high boat use and mooring availability.

Put double yellow lines on road to prevent all parking and making it safer to walk along.

This all sounds very petty. Sounds like parking and mooring limitations are to make more money. Also by doing so you are excluding a minority

As above. Tackle anti social behaviour through existing legal framework and boat licence conditions.

Enforcement of over staying boats

I think my views above probably indicate my view so on enforcement of moorings. Making it impossible for people to park means that they can't work or take children to school and therefore, unless wealthy and retired can't live on a boat. The road here is not overcrowded and so I can't see any other reason to introduce traffic management. Overstays of moorings are dealt with by CRT already are they not? And should not therefore have two I

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To be honest although some boats have overstayed (some with good personal reason, some), this shouldn't matter to the residents who are campaigning so hard to get rid of the moorings, as there would be the same number of boats, just a higher turnover. There are few places for continuous cruisers to moor between Bath and Bristol and I fully support the continuation of these moorings. As a regular walker, I have not witnessed any traffic issues and residents driveways are protected by white lines & no parking signs. If there ever is a traffic issue, B&NES council should deal with it. Any issues of overstaying should be addressed by the Canal Rivers Trust. A reservation system would be unworkable as you cannot always plan your stay on the river eg River level fluctuations, mechanical breakdown, sickness can prevent boats moving as planned. Boats should not be charged, they all pay a license fee to CRT already.

If moorings are to remain, rubbish bins provided and clear parking laws - 3 people on a boat means 3 cars. Mead Lane cannot cope with this.

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I think it would be a shame for mooring to remain, I have been walking by this river for a very long time and it is really bad now, there is no access to the river as boats are moored, sometimes doubled with no gaps. there is music and boats engines going I presume to charge their batteries, each year i see less and less Swans and Ducks, I feel sorry for the residents, some times I've see on a Sunday boaters repairing their boats by cutting and sanding wood all over the verge and road, this area is being abused. I used to fish with my dad but there is no place now as too many boats and cars parked on the verge.

Treat people as individuals, if a boater is causing a problem, address that specific issue don't penalise everybody.

I can't see how the introduction of reservations/charging will have any true effect, throughout the country there are individuals with little interest in observing any form of management on there chosen mooring place, so I feel this will only lead to lengthy and expensive actions to regulate. As to traffic management, very difficult with walkers, dog walkers, fishermen, sailing club members, some boaters, visitors to local residents and also local tradesmen working on residential properties, all looking for parking, it's not just boaters. Putting some sort of parking management in place will be costly and will impact on the local community, possibly more than boaters, as not all boaters have a car.

Make parking for residents only on the road

Facilitate active participation in the upkeep by local residents, boaters, liveaboards.

If more moorings were introduced say a Bitton railway down stream of mead lane no additional measures would be required

Someone needs to stop them talking over the area they do not respect the space always overstay and mess up river bank

Enforcement of stays and checking of river licences

Checks on river licences, enforcement of length of stay. Charging to moor but only over night.

Should not be allowed to continue. If they do then proper management and enforcement should be introduced immediately - with powers to move on unsightly wrecks both on the water and on the road. Several times this last few years it would have bene impossible for a fire engine to get down Mead Lane due to all the vehicles parked badly at narrow stretches of the road.

Enforcement and or fines for overstaying is expected on all CRT waterways anyway. Boaters are already charged for use via their boat licences. If extra facilities were in place and boats could moor permanently then boaters would expect to be charged.

CRT need to enforce the process they have already for dealing with boaters that overstay.

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Charging might be an option like the Thames but the main priority must be to move overstayers on

Would need to introduce reservations/charging to regulate and money raised go towards maintaining the area.

encourage non-polluting boat living and checks to move on overstays

The area is not suitable for moorings.

I don't think the council has the capacity or finance to monitor the area so it will be unregulated as it is now. No one will be checking.

Speed restriction for vehicles and speed restriction humps on road.

Volunteer wardens? Charging system could work. Could they get a refund if they ate/drank in the Bird or Jolly?

Stop all parking on the road- it is narrow. A mooring ban is not necessary. Can the canal and rivers trust do more? Can Avon and Somerset police do more to deter the behaviour of people racing up and down to the Jolly Sailor.

Increased mooring would possibly become a problem to the environment along the river bank

Traffic management is key and reassurances and obvious management of the area, to ensure litter control etc.

Should they remain, they must be checked in order boat owners to not take up semi permanent residence.

Overstays should be managed by CRT in the same way as the rest of the canal. It should not be up to the residents to monitor overstays as they have no idea what the situation is or whether the boater has requested an agreed overstay

People should be charged a substantial fee for mooring in such a beautiful area - after all, they would have to pay a large sum to rent a property nearby.

Make it all 48hr moorings

Bring in wardens

I strongly feel the moorings should be removed, however if they are to stay proper facilities need to be provided especially to dispose of human waste boaters are not using the toilets available further upriver as it's inconvenient, and are tipping waste into the river instead. Overstays should be rigidly enforced and fines issued for overstaying, reservations and charging may help to alleviate this. Traffic and parking needs to be patrolled as many of the boaters are actually not visiting and are living at the side of the river.

The moorings should not remain. If they do, management should repair the damage to habitat for wildlife, protect the views, and manage the associated traffic that seems always to be clogging the small amount of parking available next to the bridge by the Bird in Hand. There would have to be strict parking and mooring checks and enforcement of penalties.

Moorings need to be effectively policed.

I am not a boat user, but strict enforcement is required. The noise and antisocial behaviour, even if only from the few and not the majority, is no doubt the most difficult aspect to deal with.

Overstays are a problem for us leisure boaters

Need better facilities and enforcement of overstay. I think it's the lack of enforcement that has caused the issues

Mead Lane is very narrow and parking along that stretch is hazardous, as there is frequent traffic accessing The Jolly Sailor and the water works. It is an area for walkers, cyclists and families to enjoy in safety and tranquility. Who would be responsible for enforcing and policing a charging system?

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charge £100 per 24 hours and closely supervise

charging £100 for each 24 hour mooring

Anybody displaying antisocial behaviour should be asked to move on. Only 24 hour mooring and somebody who can actually oversee this.

Why has this suddenly become a mooring survey?

Enforce existing mooring times, it's fair to all.

Maybe you could register to reserve a spit for two weeks? That way a boat would have to move because the likelihood would be it would be fully booked and and on a rotation. Keep the 48hour free though for emergencies and holiday boaters.

It will obliterate what is left of the wildlife with the mess that is left behind by boats.

See previous plus it is s beautiful area bring lost under rubbish.. less birds on the river in recent months

As is often the case, the minority are spoiling this for the majority with decent boaters and residents being negatively impacted by a few. With increased management/enforcement of the waterways perhaps by a liveaboard warden as used to be the case with similar issues in London together with more rigorous enforcement by BANES/Police

seems to work ok as it is. a little bit more cooperation is all that's needed

As we know any effective enforcement of overstays and traffic management is unlikely please ban moorings and restore this lovely stretch of river for use by responsible people.

Charging for moorings should not be put in place as river licences are paid for. Disrespectful boaters should be moved on immediately.

There is no point in a system if it is not regulated or enforced

Better enforcement is essential - at the other end of Saltford, east of the marina, boats moor even though it is Duchy land and mooring is prohibited; all the signs have been removed. The prohibition of parking on the river bank is essential to improve amenity and safety and to deter long term mooring.

Limited number of moorings. Mead lane is not a car par so there has to be enforcement of this. If there was a charging system this may help but on the flip side there are mooring further round and i have seen cars parked on footpaths hundreds of yards from any road where they have been driven across fields to park up near their boat.

Robust enforcement of mooring stay times and CRT boat license T&C's relating to antisocial behaviour would solve the problems identified by local residents and others. Mooring should be free of charge as there are no facilities here, in line with other CRT waterways. Concerned local residents could be trained by CRT to be Volunteer Mooring Rangers and use the BSA Lite App to record boat index numbers to assists CRT Boat License Support staff in the enforcement of stay times and any antisocial behaviour. The BSALite App can be used to record a variety of mooring issues besides boat index numbers.

The mooring are one of very few legitimate places to moor on the river and form a natural point to break the journey from bristol to bath which is challenging to complete in a day.

i understand that there are a few that have overstayed or caused problems - this needs policing game and should not spoil it for the many. Please find a solution to this - a bann is not the answer.

More enforcement would be good, but that does cost money

Overstays should be recorded and enforced by crt in the same way they are managed on the canals. There is no real problem with either mooring or car parking. This has been fabricated by local residents as a way to try and get rid of boaters from the area.

Fines for not moving on

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

I'm of the understanding visitor moorings are on a trust basis. CRT monitor and contact if there is an overstay, or speak directly with boat owners why would that need to change?

CRT management already in place to issue fines

No mooringd

Just don't let moorings happen there. There is a marina further up the river.

Ask the environment agency who may have some ideas

There should be no moorings

I think the spot should be checking as it is and should just be seen as another point on the river.

It seems the lack of management has lead to the current problems. So any form of management would be an improvement. If the moorings are to stay, some form of rubbish collection needs to be put in place.

The area needs to be monitored/regularly reviewed to ensure the river remains viable for the wildlife, swans, otters, fishing etc. Some moorings are a real eyesore and the occupants create a waste problem

would like to see some form of enforcement and regular 'policing'

Limit stays to a maximum of 24 hours with nominal charge of say £10 with addition of £100 per 24 hours for overstays. To be enforced by a commission based company as applies to many private car parks..m

If they stay someone had to move them on after an overnight stop and no returning to the area for a month - last few years 'engine broken down' signs on one boat and there all winter. No point having rules if there is no one to enforce them

It works fine the way it is. Canal & River Trust do enforce overstays, boaters get their licence renewals restricted or refused for overstaying (as well as for not moving "far enough"). There should not be a reservation or charges system, this would discriminate against poorer boaters (both leisure and liveaboard) and contribute to the excessive gentrification of the surrounding area. One way to reduce boat traffic on the river and reduce the number of boats mooring at Mead lane would be to persuade Canal & River Trust to drop the unlawful 20 mile travel range requirement. A lot of boaters only use the River Avon because of this, a lot don't want to be on the river at all.

Totally unsuitable as a Mooring.

Overstays should be regulated of course, presuming there are no reasons such as ill health, mechanical breakdown or dangerous navigation conditions. As there are no facilities, such as water points, elsan disposal or recycling, a charging system would be unfair.

There should be an annual residential moorings created, this would reduce enforcement costs, increase affordable housing and the residents should be responsible in keeping the area clean

I feel this would not be managed properly and it would soon revert to the problems that are there now.

The moorings must not remain.

Current enforcement by the authority is cost neutral

It won't get managed properly because resources are understandably tight.

Any overstaying issues should be dealt with through existing licensing/enforcement measures - ie. implement the rules which are already in place regarding 14 days/movement, and anti-social behaviour). Perhaps add a caretaker mooring (see example of the Noel Rd 7 day moorings in Islington, on which there is a caretaker boat - a volunteer from the boating community - who ensures compliance to mooring rules and moderates behaviour). Ecological and social concerns

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

are valid, but should not be used to punish an already marginal group, most of whom are both compliant with existing rules, and part of a low-carbon, eco-conscious lifestyle. For one thing, you will not deter existing rule breakers merely by adding more rules! First enforce the rules that are already in place, and involve rule-abiding boaters in the solution, rather than casting them as the problem.

I am in support of all of the above suggestions. Whatever it takes to keep the moorings available for lawful users

Enforce overstays properly

There needs to be enforcement of both mooring times and vehicles belong to boat owners. This should help reduce friction between boat owners and residents of Mead Lane

Please enforce overstays. Give it a blitz every now and then and hopefully word will get round. The speed limit for cars is already 20 miles an hour and most people abide by this, it is just the number of cars and I don't see how that can alter while Wessex Water, the pub and the sailing club are using the road. These are all legitimate uses, so I can't see a way to change things. No pavements please as that would spoil the rural nature of the area.

It should be mandatory to have river safety trading and pass a test.

I do think that more effort should be made to punish or fine overstayers. In life people will always push the boundaries and try their luck if allowed to. It is one of the loveliest spots on the river, possibly in the country. This is why I suppose people overstay there but in doing so, this greatly effects the local residents but it also effects other boaters. We went through there this summer and we could not moor due to there being no space. I was told that some boats had been there for 6 or 7 weeks. The people that overstay are not being kind to their fellow boaters, just as much as to the local residents.

More meetings with the community

Who would manage this? We have been left for 3 years with no Policing and the situation has got more and more stressful for residents. BANES has a duty of care for residents and river users alike which has not be upheld.

Limit the number of boats and for visitors only, or just a couple of 14 day moorings. Control use of riverbank as cards, bbs, equipment often cause obstructions. Traffic is an issue so some proper passing spaces required.

No parking of vehicles alongside the riverbank. Consider providing a parking area associated with the moorings e.g. at 'The Jolly Sailor'. Strict enforcement of overstays. If a few 48h moorings remain, reasonable for these to be free, but if any more need to be booked and chargeable to support associated regulation and infrastructure costs

It will permanently ruin the river bank and wildlife if moorings are allowed to continue. Action now to stop further damage to the natural area.

There has been no visible management or enforcement of the overstaying and its subsequent impact on traffic management. BANES appear to have no process or experience in managing the situation. Looking at the wider issues that the CRT face with managing the Kennet and Avon as a whole and having experienced the belligerent behaviour of the minority of the boaters who have become the 'majority' in Mead Lane, then if there were enforceable solutions why have residents been subjected to what can only be described as a 'miserable' situation by BANES. A LNR would avoid the domination of this short stretch of the river by the few and return it to the huge array of other users who have been largely excluded during this trial.

Don't keep blaming issues in boaters. A lot of the problems I saw when I was there (rubbish, noise and bad parking were from day visitors due to the great weather.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

As there are no facilities in Mead Lane, moorings if they have to remain should be for a 24 hour/emergency period only. These should be available only to boat hire companies where no vehicle parking is required.

Unfortunately there can be abuse if the moorings are unsupervised. Therefore enforcement may be required. If parking of boater's vehicles is an issue, the area could be made a residents only parking zone. Although it is always preferable to be able to moor freely, if ultimately necessary a reservations system and a modest charge would be acceptable.

Some mooring bollards so the surrounding trees are not damaged

The moorings shouldn't remain. This is just not a suitable place for boats to stay.

No more than 2 days per boat per 28 day cycle

Haven't thought about it

You simply can not have the residents regulating these moorings.' CRT need to step up their-game

I don't think there should be a reservation or charging system. I think that repeat offenders should be spoken to and unless they have good reason to overstay should be advised to move elsewhere. Communications between these boaters and local house-dwellers should be mediated and supervised. From what I can tell behaviour from residents of Mead Lane has been equally as toxic as the behaviour of a minority of boaters and it should be taken into consideration that the anti-social image of boaters may be overexaggerated and based on assumption. The overwhelming majority of boat dwellers choose this lifestyle because of their love and respect for the waterways and wildlife and treat it with care.

Charging should apply. Based on band d council tax. Needs to enforced or it will end up like new illegal caravan site opposit lower Bristol,road caravan site.

I do not believe we have a enough river personnel to police the moorings, there are always loop holes with boats moving and exchanging per agreed locations to make it look like that have moved

Just treat them like 14 day moorings elsewhere, why make it hard...

It would need daily policing of some kind.

Boaters are a marginalised community and more needs to be done to police the abusive, intrusive, slanderous and harassing behaviour of residents.

Complaints towards boaters by residents regard those individuals and not the boating community as a whole, as such restrictions which would adversely affect rule abiding boaters as a whole have no basis

Maybe a charge per day say £5

Clearer signage to show where people can and can't moor and how long they can stay would help. More mooring available at other locations nearby on the river would relieve any capacity problems in the summer holidays.

Individuals that abuse the system should be noted, reported and fined. It is the same across the waterways, the minority of people ruin it for the rest of us who want to play by the rules and enjoy the waterways and lifestyle that comes with it.

The moorings need to be monitored professionally and maintained. The issue is not just with the boats it is also with people coming out of the local towns and city's and creating mess and noise. The boats will stay either way so having a system in place mean it can be followed and also implemented

Enforcement of overstays and charging

If we cannot stop all moorings, then a charging system seems the best way forward

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

As above, take enforcement action against overstayers. It sounds like the selfish minority spoiling it for the majority

Enforcement of a 48 hour rule and penalties for uncivil behaviour ie threats rubbish etc to protect wildlife and reputation of responsible boaters

With proper enforcement of mooring times, the area could be a real benefit to visiting boaters - not those who want to stay for long periods of time particularly but those who just want to visit the area on a short stay basis. Proper enforcement works well in other areas - the best example that I can think of is Ely in Cambridgeshire.

I think there definitely needs to be enforcement of the existing rules about mooring but do not prevent boaters mooring or restrict the length of moorings. You will only get a stack of boats mooring up over shorter stretch

As I cannot see how there would be sufficient resources to enforce any new regulations, I would like the area to be a wildlife area.

CRT to monitor boats as they do today across all canals.

Suggest you look at the very successful,scheme in Ely.

Ask Canal and river trust to manage the moorings

These moorings need to be controlled by CRT and local council

I would like to see overstays being enforced or they are worthless as an idea.

No overnight parking on Mead Lane, pre book mooring via website in advance but do not introduce charging. Instead make it impossible to pre-book without a valid CRT license.

Traffic management. No boats. Restore the banks to encourage wildlife (the banks had to be disturbed to improve flood prevention) but they were growing back.

Provision of facilities to encourage good behaviour and charge a small fee

Manage parking. Say 2 hours. Change mooring fee.

Enforcement must be robust, particularly in the case of 48hr mooring.

Always a problem, but caused by a small minority of selfish people. Please don't penalise the rest of us.

Follow existing waterways regulations. They work as they understand waterways lifestyles and do not come from a place of prejudice.

Clamp down on noisy partying and parking along the banks. B&NES may be getting revenue from the barges but at the expense of the quiet enjoyment of their (council taxed) homes by local residents. Reduce council tax to local residents?

More patrols to police the use of the moorings

CRT should monitor and take action for overstays. I do not see that a reservation or charging system would be fair as boat licences should cover this

I am totally happy for mooring overstays and anti-social behaviour to be managed and policed for boaters and the residents alike

Needs some enforcement to be successful. People who are just passing through using 48 hours to visit are unlikely to bring vehicles with them, unlike those who want to stay two weeks, thus removing the problem of traffic management. Charging of overstays would be fine, as long as people genuinely wanting a <48hr stay aren't charged.

There are people in every walk of life who may live a bit differently to the way we do; who are we to judge? live and let live or move away if you cant hack it.

Cars to be parked else where. More police presence. Proper rubbish bins. Nothing to be let on the riverbank. Boats to be emptied in correct place (toilet/sink waste etc). Stricly no pollution.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Mead lane provides a space for attractive and interesting boats which home families bringing a diverse and community atmosphere is a public space, I use this path all the time and have done for years, I really live that I can share it with the people that Moore up here, I have always found them friendly and respectful. We need more housing and more flexibility to provide welcoming spaces for all kinds of families. I would very sad, if not angry if these you g families were not allowed to continue living here. It's a place of real beauty and the pretty boats and their residents add yo that. I would feel we would be looking part of our culture if they were not there any more. I live in a house but every time I see these boats if makes me happy that there are people out there living a different wilder life than I. I trust this will continue.

There are sufficient existing powers available to the Local Council to restrain anti-social mooring practices

i think that a lot of the problems with parking is people coming to swim and do water sports not boat dwellers mooring there, also a charging system would be unfair as people already pay for a licence

Charge them rates.

Reservations and paying to stay

I think as a general point overstaying is not enforced enough hence becoming a problem for the authrorities managing them and the boating community

There just needs to be a crt spotter there once or twice a week. Reservations won't work and boaters with a crt licence already pay to use the water.

Enforce overstayers. Am happy with having a booking system/small charge

Sadly, the current system clearly does not work, so think Mead Lane riverbank area should revert to a local beauty spot.

Overstaying without prior agreement (eg medical emergency) should have financial penalty

Maximum number of boats to moor. No return if you overstay. Pre-reserve to moor.

Proper enforcement of mooring times

Be better at nipping problems in the bud. Better patrols by CRT, more understanding from local residents with regards to boaters who are quiet and law abiding. Do not paint everyone with the same brush. More tolerance but fewer chances for things to escalate should there be issues with certain boaters. Swift action by police or authorities. Harmony between residents and boaters!! Live and let live attitude to those who respect the rules!

Saltford Parish Council refers to its 4 June 2019 resolution on Mead Lane* (to be submitted separately with policy statement response). SPC is concerned that the B&NES mooring trial has exacerbated the problems of non-compliance with mooring limits, anti-social behaviour and heavy littering from a minority of boaters as well as the disruption caused to residents, visitors and other river users and damage to the flora and fauna of the riverbank. Evidence submitted by local residents to B&NES Council shows that these issues have got considerably worse as the trial progressed from 2017 into 2018 and the situation has continued to worsen during 2019. The trial has clearly demonstrated that Mead Lane as a hitherto unspoilt beauty spot in the Green Belt and in close proximity to residential housing is unsuitable and impracticable for moorings which require continual management. It lacks the infrastructure (pontoons, purpose built embankments, water, waste and sewerage collection etc.) normally associated with moorings which are having a detrimental effect on the natural environment for one of Saltford's most important amenity locations for viewing and appreciating the local landscape, the Cotswold AONB. SPC concludes that, in order to protect the riverbank for the majority of visitors, most of whom would not be aware or in a position to respond to this consultation, and residents who all value this important

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and iconic location, a mooring ban should be implemented without delay commencing with, on health and safety grounds, an immediate winter mooring ban. An immediate mooring ban would allow a period of time for the riverbank habitat to recover. During and since the mooring trial B&NES Council has been unable to provide monitoring or enforcement of moorings at Mead Lane despite the many problems that have been encountered from a minority of boaters; the effect on the lane, residents and visitors has been considerable. Mead Lane should therefore be returned to its former more natural state of a healthy unspoilt riverbank where wildlife thrives through the designation of Mead Lane as a Local Nature Reserve where mooring is not permitted. The riverbank requires better protection from vehicle encroachment and damage whilst the white lining of the lane to protect access for residents, emergency vehicles, Wessex Water, etc. should be repaired or renewed as these are in a poor state.

Control the local kids using the footpaths !

a proactive CRT patrolman

Regulate the moorings. I like looking at the boats and dont want to see them go

A reservation or charging system would be good because it would deter those who flout the rules by staying too long. This area needs more leisure moorings for visiting boats - 48 hours or even 24 hours is ample.

anti-social overstaying boaters give us all a bad name. Enforce the rules and the problem will disappear.

CRT will have to control overstays better. Traffic is not a problem then.

Overstays are already penalized by CRT who are very strict on licence holders. Adding a reservation and charging system would ruin the place, besides boaters already have a hard enough life. Speed bumps would help slow the idiots who often drive down the road very fast. Moor moorings need to be made available along the river to reduce bottleneck mooring.

Enforcement of overstayers

I don't think having any type of mooring arrangement would work as any system would not be adhered to and BANES do not have any resources with which to enforce it.

It is not a suitable river bank for overnight stays as there are no water of waste facilities. On the River Thames these are well provided for at certain well advertised sites, so stops at these can be planned in advance..

Less of them and vet people

I disagree with charging, it would exclude access to a shared resource for people who can't afford it and would end up being a cynical money earner. CRT have been developing and implementing existing ways to enforce over-staying penalties.

Mooring restrictions should be strictly enforced to allow the maximum number of boaters to enjoy this beautiful location

Charge to deter moorings

If some moorings were allowed to remain these should be properly enforced to prevent overstays etc

Sufficient parkinh allocated , sufficient recycling and waste bins to support the residents,

Managed for overstays, litter, accessibility for other who want to use the space but feel intimidated or just can't find space between the moorings.

There isn't really room for traffic as well so I would prefer it as a cruiser mooring with 7 days so that genuine cruisers use it. I would be keen to enforce sn overstay past 24hr

Parking should be stopped on the road & more bins should be installed

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Mead Lane is not big enough to accommodate much traffic, so unless that area is going to be wholly demolished and a large road put there, it cannot sustain this level of moorings and we will lose valuable trees and wildlife.

B&NES should work with the canal and river trust to enforce mooring regulations that are already in place, rather than responding to complaints by jingoistic house dwellers who seem to have been given the power by the local authority to monitor the mooring situation there.

This simply requires more communication with the CRT & local neighbourhood policing team. It's a lovely area, I'm sure a representative would jump at the chance for passing patrols to ensure rules are being adhered to. If parking is truly an issues could there not just be residential only areas?

Canal and River Trust should be more involved in monitoring the moorings, making sure boats move once their 48h/14 day stay is over, unless they have a genuine excuse to overstay

Having a simple system in place to managing the moorings in a way that some boats don't overstay is a sensible idea

I think it would be a shame to ban all moorings because of the antisocial behaviours of a minority. Better enforcement of length of stay, noise controls with 'curfew' and enforcement, more bins including dog poo bins, designated mooring spots with space between. I quite like the boats and think they add to the aesthetic. Most boaters I have come across are friendly and courteous. As ever it's the minority spoiling things for the majority.

Just the normal crt enforcement should be sufficient & the process should already be in place

If you really need to manage it, why not use a pay-and-display ticket machine, same as in car parks? But does it ctually need managing?

No need for all this at all. Overstays can be moved on by a local warden. Charging is just silly. Traffic, well, thats nothing to do with the moorings, parking is controlled in the usual way and it is access shared by homes, businesses, sailing club and walkers. The bank of a river is a restricted place and its a shame its planned to deface it even more with signs, road markings etc etc.

Local council should manage the moorings to ensure no overstaying. Moorings are few and far between on this stretch of river.

Provide mooring rings and electricity bollards and charge visiing boats £10 per night for moorings.

Policing of moorings regarding sewage litter and wildlife survey ensuring they are not negatively impacted

Stop them blocking the path next to the road. Proper enforcement of rules, and also environmental respect.

Hard to regulate,

Needs to be heavily regulated to return to being a pleasant location

They park on Avon lane on the cycle track entrance and up further opposite our field

Charge overstayers

The council and CRT could look at charging for stays of more than 48hs and a fine type charge for overstays longer than 14 days. This is used on the River Thames with some success. But current enforcement powers are sufficient and need to be used. "Problem" boats will likely ignore a mooring ban anyway. Road traffic is likely just residents and dog walkers.

The river was made navigable by the building of locks and weirs specifically to enable boats to be able to use a long time ago. Mooring spaces along our waterways are becoming ever more difficult to find. The removal of mooring and car parking restrictions seriously detract from people's right to live very a different lifestyle, something which is surely the mark of a free society. By attempting to restrict parking or impose penalties, it also creates difficulties for the children of

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boat dwellers being able to attend school and difficulties accessing health care, which is contrary to B&NES policy on travelling boat dwellers. The majority of parking on mead lane comes from visitors to the residential houses, imposing parking restrictions on Mead Lane would disproportionately negatively effect boat dwellers. All boaters have to pay their annual boat licence, this pays for upkeep of the waterways and essential services like water, elsan disposal and litter and recycling points, it is in effect the boaters equivalent of council tax. I there fore believe that they have the right to expect the same freedoms as house dwellers, like on street parking, by denying this it is effectively making boat dwellers second class citizens and unfairly and in my opinion illegally discriminates against them. Under CRT rules, continuous cruisers must move at least every 14 day, therefore powers already exist to deal with overstaying.

Reduce it to 48 maximum stay and only have a maximum of 2 moorings on this part of the river so it can enjoyed by all

Enforcement is not practical. The boaters would not abide

enforcement of overstays should be addressed by CRT. charging moorers for a river mooring is simply immoral, prejudice and an attempt to gentrify.

If necessary a reservation system could be implemented, however the towpath would need some work and more bins would need to be provided. I cannot support you charging money for this space. It is a recourse for all and the lack of boaters community there would leave it empty of life, unsafe at night and fractured.

Work together with the CRT to prevent overstays. As the boating community find it very frustrating that a very small minority abuse this spot and we all lose out. Maybe introduce a fine for overstaying rather than a charge.

Remove the mooring at once

No reservations or charging.

It is a narrow road, so double yellows and arrangements to park in the pub would help

Charging parking ticket style using MiPermit perhaps to allow for cost to be used to employ someone to keep the area nice

Strict regulation of very short term moorings

Too much traffic and rubbish ruining our environment

The moorings work well within the terms they are now. The enforcement committed by the CRT is adequate

Overstays have not been enforced and antisocial behaviour has spread up towards the High Street. Please let us have our quiet unspoilt riverside back please

Would need official mooring areas with jetties to stop damage to riverbank. Litter needs to be managed. Somewhere for cars to park rather than all along the riverside. If nobody can be employed to enforce charges, manage overstays etc, mooring shouldn't be allowed.

There MUST be more regulation including on parking

The authorities need to do regular check to ensure boats do not overstay. As a boater, I know that only a few individuals do this, and give the rest of us a bad name. Regular checks and penalties for overstaying need to be enforced. Allocate parking somewhere for the boaters, so they do not need to park on residential streets (although everyone has a right to park on any residential street if they wish, as long as they pay road tax)

Please get rid

Needs regulating if moorings are to stay

There could be a short section of the river allocated for mooring providing it was carefully managed

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Traffic congestion is a problem, especially in the summer when the river attracts recreational visitors. It would be good to have a "park and walk" car park, perhaps at the Avon Lane end or on part of the Wessex Water sewage treatment plant, as parking on Mead Lane is already restricted by white lines opposite residents' gateways.

You have to monitor boats on a daily basis, enforce fines for overstaying and maybe reservations would be a great way to monitor things, some thing must be done before it is a place that no one wants to go.

Needs higher charges for shorter periods and to be enforced daily

With a the cuts in local government I am sure managing the mooring stays is not going to be a priority

Ask CRT

I dont want them to remain, they have so far shown no respect or regard to the place or residents that live here, it's a natural beauty spot not a travellers waterfront pitch!

Should not be moorings as it restricts use by all other people. Should be unenforced and no overnight

Keep the moorings and make them all two week stays

I do not believe enforcement is a sustainable option. The degradation of the river bank and wildlife habitat is happening on a daily basis. Action is needed to remove the moorings as soon as possible.

As above it would require full time shift employed staff to manage regardless of the quantity of boats and this management *needs* to be 24 hours, 365 days a year.

I don't see traffic management as an issue and have no specific comments on how CRT manage reservations.

Can CRT not police overstays? More 48 hour moorings would not create less traffic/parking issues, visitors would be less 'set-in'. Charging or pre-charging I am against, we all pay for waterway licenses (increasing dramatically), the need to pay at locations such as these does smack of gentrification. Anyway, 48 hour moorings likely to keep things manageable.

Crt should enforce overstays just like they do on the whole canal system.

I think maybe a time scale and a donor return within a certain amount of time would help

I don't think that any change from the current situation is necessary. There already is a CRT system for policing overstays, but it is a concern for the boating community, I don't really understand how it materially impacts upon other residents or visitors to the river.

There would need to be a significant change in the management of moorings to ensure compliance by all users.

It needs to be policed and I can't see this being able to happen 24hrs, 7 days a week, unless they are private moorings or owned by Bristol Boats.

CRT should be managing this anyway, does this situation need a special system to other waterways? As a regular cyclist visitor, it appears traffic is from other leisure users...swimming /visiting the pubs etc.

Moorings for holiday boats are fine, there's far too many residential boats that look a mess and cause traffic chaos blocking mead lane and my entrance and the sewage works.

More enforcement, less traffic

I believe the council has other more important ways on how to spend its money rather than on how to manage the mooring. A no mooring seems to be the best solution.

This is ludicrous! The 14 day moorings at Mead Lane are a lifeline to boaters without a home mooring and there should be no such thing as a charging system when there is nowhere else safe

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

on the river to moor. Charging boaters to stay is gentrification and will mean boaters with limited income will have zero option but to moor in unsafe areas and potentially risk their home and life.

I am concerned that a lot of the barges do not have sewage holding tanks and discharge straight to the river. A token system at the pump out would prove that they did visit the pump out as long as it's enforced.

Regulation of mooring stays

It would be nice if people didn't take the Mick with mooring or parking but they do, so perhaps either CaRT or BaNES could patrol?

strongly against charging.

Just regulate the stays to avoid permanent residency and encroachment onto the river bank

Works well as is

No charging system as this is prejudicial against continuous cruisers and risks turning the moorings into a tourist only spot. Possible introduction of winter moorings to allow people to stay in one place over winter.

I have enjoyed narrow boating myself and found that in most areas we could only stay overnight. At Mead Lane at the bridge by the Bird in Hand pub, we have for the past few years, had a cold narrow boats moored there as permanent. Since then we see more and more people thinking of Mead Lane as a permanent place to live.

Dish out over staying penalties and CRT should man it like they do the canal

The use of drugs on the boats and spreading out of junk on embankment from boats

A booking system for moorings would work for me plus it would make it easier to know if there is a spot available before setting out. For such a system to work enforcement would be difficult. Traffic is tricky. I personally don't mind parking a bit away sometimes but sometimes you also need to be closer. Maybe free parking in the evenings (e.g. 6-8) and permit only other times (this would also allow vulnerable boaters permits). Free on weekends..

Definitely need to enforce time limits and take action against overstays

Charging / reservation system would be unfair

You need a permanent enforcement officer on the bank who can call on support as I have felt threatened by the noise levels and some but not all of persons from the moorings

Daily checks and fines

I was under the impression C&RT had responsibility to enforce the area, and should up their checks to enforce overstaying.

Leave it as it is. Live and let live

If overstays are not for a genuine reason and the CRT have not been informed then measures should be taken to liaise with the boat concerned.

CCTV to be installed and managed by Banes

Remove them and enable sailors to use this very short section of river. There are miles of riverbank where no sailing takes place - let boats moor there instead!

Enforcement of overstays makes sense. If this was in place the other actions mentioned would be unnecessary.

If moorings remain there must be some formal way for the boaters to get water, use toilets and dispose of waste without either using our facilities or polluting the river. If this was done I would suggest that there are other/better locations than Mead Lane and this would be better managed as an open space to avoid the antisocial elements of boaters and generally spoiling a rare roadside river view.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

overstays not possible to manage . the boats just shuffle up and down the river to comply

It works well as it is and I experience no problems there.

Better relationships between the boaters and local residents would be achieved through community meetings, talks and social events

Please do not charge, we pay our licence fee for the privilege of mooring there and we would park elsewhere if we were forced into paying for parking along mead lane.

Should be the same as the canal from Bath to Devizes

No Parking along the river bank (with the exception of resident visitors) street Lighting along the lane, regular patrols to enforce traffic and river bank abuse

I think that the traffic could be slowed down with speed bumps or something else. The traffic going to and from the pub is increased in the summer and that has nothing to do with boaters. Some boaters could be more respectful with regard to noise so maybe make it a quiet zone to regulate this.it needs to be made clear that if a boater is unable to carry on with their journey that they not receive harassment from local resident but that there is a contact at the trust to handle this more sensitively as someone could be ill and not able to move.

I would be in favour of enforcement of the 48hr/14day behaps this could be done in partnership with crt? But not charging or booking

Boater and non boaters need to respect each other

I think there should be policing and enforcement of the area to ensure compliance with local bylaws, charging system to regulate mooring of more than 48 hours and the money put back in to the area.

Double yellow lines all along Mead Lane. Allotted parking for moored boats only. Traffic calming for Mead Lane.

If mooring remain then it needs to be policed by BANES. Overstays need to be moved on in a timely manner, neusence moorings need to be moved on in a timely manner. Parking situation needs addressing i.e Yellow lines outside residents driveways to keep access. More public bins to be placed along the bank

Closer dialogue with the local residents.

Vigorous enforcement of the rules

Options chosen at the last review are clearly not workable. Enforcement appears to be non-existent. Traffic Management - provision for river users to park during the day, but not overnight. Reservation/Charging - unfeasible and unworkable given the inability of the Authority to enforce existing arrangements

The Crt do a good job on policing the mooring

If the moorings were to remain, which we as residents would certainly not want, then the council are going to have to invest in the infrastructure on the lane. Water and sewerage facilities would need to be installed, there would need to be proper enforcement of any mooring restrictions, charging would need to be implemented to help pay for this public investment, proper parking facilities for the travellers and general public to use safely. We understand the sewerage treatment works at the end of Mead Lane is to greatly extended this will mean construction traffic for a number years, this will need clear access along the lane for the safety of pedestrians etc. This is just the start of the necessary council funding. But I will re iterate, the residents absolutely do not want the boaters to continue their take over of our lane!!!!

just enforce the existing regulations on both mooring and parking

Management of the moorings is needed to reduce overstayers.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

The moorings are not an issue and do not need to be managed, 14 days should be ok, people stay longer on the 48hr waiting to get into the 14 day moorings because there are not enough 14 day mooring spots. People who buy a house by the river need to be more psychologically flexible and accept that boats mooring is a part of the river's life. Boaters don't try and manage the lives of the peoples houses and their movements so why should they feel entitled to do so with boaters? If you buy a house by a road you do not expect the road to stop being used as people pay road tax to use it. It's the same with the river.

Manage by CRT

A matter for CRT

Enforcement can be conducted every three to five days, boaters normally respect limits. I'd imagine the pub could be good to arrange reserved parking with to prevent road blockages.

I think motor enforcement and education of boaters overstaying on the moorings is necessary. But also to acknowledge that facilities are required for all boaters not just those on short holidays. more mooring need to be made around the area so people have the ability to move on easily

They must not remain!! Or the site should only be limited to a few moorings (2 or 3) 24 hour limit stay for leisure boats only. . Properly monitored and enforced!!

There seems to be a few boaters who think they can out stay their mooring times,crt need to make them move its not fair on people who want to use the moorings.mooring spaces are few and far there needs to be moor visitor mooring along the river and be treated right.

CaRT should manage overstays as they do with the rest of the canal network. I strongly object to a charging system. We pay an expensive licence fee to use the network and no where else in the entire country charges. I can't see any valid reason why mead lane is different to any other mooring spot.

I'm not sure that the moored boats are the main parking/driving culprits. In my experience it's visitors with their canoes, picnics etc. There generally seems plenty of space for moorings so administrating reservations would be an unnecessary cost. And it definitely shouldn't be chargeable.

Need to provide proper sewage outlets for the boats to empty their tanks. Must monitor it so people don't overstay the 14 day limit. Should manage the bank to stop it deteriorating with all the mooring

Should mooring remain, a charging system must be introduced to pay for the cost of supervision of parking and mooring. In addition a "pump out" facility must be installed near the toilet facilities at The Shallows. In addition restrictions must be imposed on the types of vehicles allowed to park in Mead Lane. There have been a number of occasions this year when the gap left by badly parked vans and lorries has precluded the passage of fire engines, ambulances and other large vehicles.

It should be policed by wardens to enforce the requirements that are in place

Crt deals with overstays

To charge for moorings, mooring rings and infrastructure needs to be put in place. Again it not as simple as putting up a pay and display machine.

the access road is too small to accommodate the additional traffic movements and parking that the boaters bring, and they, in the main, have demonstrated a disregard to restrictions on parking (parking on white lines), activity (arc welding and other engineering activities), duration (over winter and beyond the limit set) and mooring (damage to the river bank and trees) since the trial was started.

Narrative Answers - If the moorings were to remain, please give your views on the future management of this area, including issues such as the enforcement of overstays, traffic management on Mead Lane or the introduction of a reservations/charging system to regulate mooring stays.

Would like to see more regulation on mooring system. Traffic management would be better if speed limit enforced. The only problem is that street furniture may impede the natural beauty of the area. Having walked down there yesterday there were too many boats moored.

Equality Impact Assessment / Equality Analysis

| | |
|--|---|
| Title of service or policy | Review of moorings on Mead Lane, Saltford (post consultation Autumn 19) |
| Directorate | Place |
| Name and role of officers completing the EqlA | Samantha Jones Inclusive Communities Manager Louise Murphy, Corporate Equalities Officer Mandy Bishop, Director, Environmental Services |
| Date of assessment | 23/12/2019 |

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analyzing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's website.

| 1. Identify the aims of the policy or service and how it is implemented. | | |
|--|--|---|
| | Key questions | Answers / Notes |
| 1.1 | <p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes | <p>The River Avon at Mead Lane, Saltford is a popular location for leisure and recreation, and for informal mooring of boats. Until now it has been used as an unregulated mooring space utilised by live aboard and other boaters. The area was subject to a temporary mooring trial introducing 48 hour and 14 days' time limited moorings between December 2016 and October 2018.</p> <p>Boat dwellers with a continuous cruising licence must move every 14 days (unless extenuating circumstances arise). The moorings at Mead Lane make up part of the local mooring network and some of those using the moorings will have a car to enable them to get to work/school/GP etc.</p> <p>The Council is owner of this stretch of the river and does not have regulatory power to enforce mooring compliance. As the Council is the owner of this stretch, Canal and River Trust do not have the powers to monitor, inspect and report on overstaying, therefore during the mooring trial compliance with the 48 hour or 48 hour stays was self-regulatory.</p> <p>Bath and North East Somerset Council commissioned an independent survey of stakeholders on the options for the future of the Mead Lane moorings, and seeking views from all those who live, visit and work in the area.</p> <p>In advance of the mooring trial white lines were installed along the lane to discourage vehicles parking opposite residential driveways (Nov 2016).</p> |

| | | |
|------------|---|--|
| | | <p>During the period of the mooring trial a Traffic Regulation Order prohibiting overnight parking between 1am-8am was consulted upon. A decision was made not to implement a parking restriction.</p> <p>The intended outcome of the mooring consultation is to resolve current tensions and complaints from some house residents against boaters and vice versa.</p> |
| 1.2 | <p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement? ● How much room for review is there? | <p>The current consultation seeks to find out the views of a wide range of stakeholders on their views on the mooring options at Mead Lane. At the moment mooring continues in a self-regulated manner.</p> |
| 1.3 | <p>Do the aims of this policy link to or conflict with any other policies of the Council?</p> | <p>This links to issues within the following portfolios:</p> <p>Planning riparian ownership Owning a watercourse</p> <p>Local housing needs assessment Review of housing needs for caravans and houseboats</p> <p>Equality & Diversity Policy Equality and Diversity</p> <p>Parking & Transport</p> |

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit report.

| | Key questions | Data, research and information that you can refer to |
|-----|---|--|
| 2.1 | What is the equalities profile of service users? | <p>In this case the service users are the general public, some of whom are boat dwellers and others using boats to travel along the River Avon.</p> <p>More demographic information is available at Travellers and Gypsy Travellers CRT figures show: March 2019 – 2,456 boaters on Kennet & Avon canal, 995 boats between Bath and Foxhangers (40% of boats on 22% of K&A), 403 of 995 are Continuous cruisers, 80 holiday hire, 43 trade boats.</p> |
| 2.2 | What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction surveys, consultation findings). Are there any gaps? | <p>Boater Survey consultation report 01.12.2016 Gypsy Traveller Accommodation (and Other Needs) Assessment 2006-2016 accommodation Bath and North East Somerset's Gypsy, Traveller, Boater, Showman and Roma Health Survey 2012-2013 health study</p> |

| | | | |
|--|--|--|---|
| 2.3 | What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results? | A community trigger was instigated which led to meetings at mead lane with boaters and residents, meetings with parish council and residents and meeting with boaters. Current consultation (see above). Extensive consultation was undertaken as part of the TRO proposal and those who took part included local residents, live aboard boaters, and leisure users: including anglers paddle boarders, dog walkers day trippers | |
| 3. Assessment of impact: 'Equality analysis' | | | |
| Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or helps promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups | | | |
| | | Examples of what the service has done to promote equality | Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this |
| 3.1 | All groups | The proposal relates to all users of Mead Lane including residents, live aboard boaters and leisure users, so is non-specific in terms of gender or other equalities groups. | The lack of lighting, hard standing and mooring rings on the river bank creates additional hazards for many people, especially pregnant women, people with babies and young children, Disabled people and older people. |
| 3.2 | Sex - identify the impact/potential impact of the policy on women and men. | N/A | N/A |
| 3.3 | Pregnancy and maternity - | N/A | No hard standing or mooring rings would create additional hazards for pregnant women or those with |

| | | | |
|------------|---|--|--|
| | | | babies and young children. |
| 3.4 | Transgender - identify the impact/potential impact of the policy on transgender people. | N/A | N/A |
| 3.5 | Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical and mental impairments). | The Canal & River Trust implement reasonable adjustments for disabled boaters. Their figures show that 48 boats/licences in this area issued licences with reasonable adjustments to take in to account Equality Act duties. Close proximity of parking and public transport may be particularly beneficial for some Disabled people, especially those who rely on public transport because they are not able to drive, or drivers who cannot walk very far to their vehicle. | See section 3.1 any moorings on a river may be more hazardous than canal moorings. |
| 3.6 | Age - identify the impact/potential impact of the policy on different age groups. | N/A | N/A |
| 3.7 | Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people. | N/A | N/A |
| 3.8 | Marriage and civil partnership - does the policy/strategy treat married and civil partnered people equally | N/A | N/A |
| 3.9 | Religion/belief - identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion. | N/A | N/A |

| | | | |
|-------------|---|---|-----|
| 3.10 | Socio-economically disadvantaged - identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances. | N/A | N/A |
| 3.11 | Rural communities - identify the impact / potential impact on people living in rural communities. | N/A | N/A |
| 3.12 | Boat dwellers - identify the impact/potential impact on boat dwellers | The proposal will have an impact on boat dwellers (continuous cruisers on the waterways network) as well as residents and leisure users of the moorings at Mead Lane. | |

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions / targets should be measurable, achievable, realistic and time framed.

| Issues identified | Actions required | Progress milestones | Officer responsible | By when |
|--|--|----------------------------|----------------------------|----------------|
| Communication: some feedback that the survey is not as easily accessible to people reliant on mobile signal to complete the questionnaire. | Meetings for stakeholders / residents and boaters have been arranged. Public libraries including community libraries where people can use computers are available. Please see consultation data and outcomes contained in the | - | - | - |

| | | | | |
|----------------------|--|---|---|---|
| | Mead Lane Consultation and Options Report and Appendices | | | |
| Accessing the survey | To ensure the questionnaire is accessible to all, offering alternative formats on request as is standard with Council consultations. | - | - | - |

5. Sign off and publishing

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council’s. Keep a copy for your own records.

Signed off by: Mandy Bishop Director of Environment Services

Date: 03/01/2020

| Bath & North East Somerset Council | | |
|--|---|-----------------------------------|
| MEETING | Cabinet | |
| MEETING | 16 January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3183 |
| TITLE: | Homelessness & Rough Sleeping Strategy (2019-2024) | |
| WARD: | All | |
| AN OPEN PUBLIC ITEM | | |
| List of attachments to this report: | | |
| Homelessness & Rough Sleeping Strategy 2019/2024 | | |
| Rough Sleeping Action Plan 2019 | | |

1 THE ISSUE

1.1 The Homelessness Act 2002 requires the Council to carry out a review of homelessness to inform the production of a homelessness strategy every 5 years. The Homelessness & Rough Sleeping Strategy 2019-24 meets this requirement.

2 RECOMMENDATION

The Cabinet is asked to;

2.1 Agree the Strategy.

THE REPORT

The Strategy came to November Cabinet for information. It has since been amended in light of comments and further information gathered during the consultation period and is now brought to Cabinet for a decision.

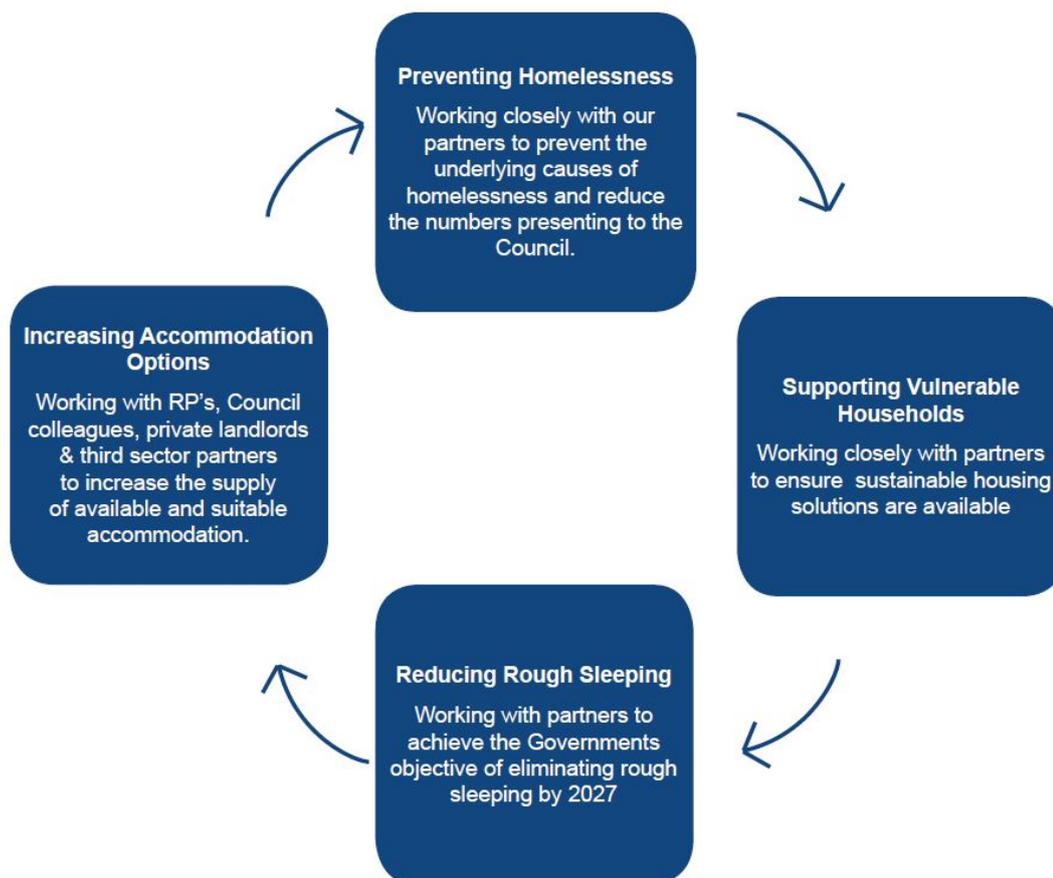
The Homelessness & Rough Sleeping Strategy 2019/24 is wide-ranging, covering all forms of homelessness. It is important to draw a distinction between the different ways homelessness is experienced. Rough sleeping is homelessness in its most visible and damaging form and is often most commonly recognised by the public. As an area regarded as having relatively high numbers of people sleeping rough¹, the Council is focusing on reduction of this number and the attached Rough Sleeping Action Plan addresses this. However, less visible forms of homelessness are of equal importance and this Strategy sets out the local picture and proposes approaches to reducing incidences of need here also.

It should be noted that whilst national and local homelessness levels have increased over recent years, the approach taken in the Bath & North East Somerset area has meant that the need to use temporary accommodation is dramatically lower than both our neighbouring local authority areas and across England. Bath & North East Somerset remains among the 30 lowest ranked local authorities for use of temporary accommodation in England.

By implementing the Homelessness Reduction Act, working with anyone in housing difficulty as early as possible and promoting the Duty to Refer across our partnerships, the Housing Options & Homelessness team have achieved successful outcomes for 48% of households coming forward for help in 2018. A successful outcome is defined as homelessness averted or ended.

The Homelessness & Rough Sleeping Strategy proposes the following framework for tackling homelessness:

¹ In 2018 B&NES was in the top quartile of English local authorities for both the quantum and rate of rough sleeping.
Printed on recycled paper



Working within the above framework, the following key priorities are proposed:

| | What we will do | Why we are doing it | What needs to happen |
|---|--|--|--|
| 1 | Increase access to private rented sector accommodation | Move-on from all supported housing and temporary accommodation has slowed down. Increase in rough sleeping levels and impact on Council budgets for temporary accommodation. | <ul style="list-style-type: none"> • Consult with landlords to find out what would persuade them to work with us. • Consider how existing resources (eg Home Turf Lettings, Turnkey) can be further developed, using social investment and capital grants, to increase the pool of property available to homeless people traditionally excluded from the private rented market. • Investigate and pilot an incentives scheme for estate/lettings agencies securing private rented sector accommodation. Use Payment by Results model. • Investigate purchase of properties for lease to Third Sector agencies. |
| 2 | Improve the temporary accommodation offer and reduce duration of all | Use of all temporary accommodation | <ul style="list-style-type: none"> • Act on recommendations of the Review of Temporary Accommodation 2019. |

| | What we will do | Why we are doing it | What needs to happen |
|---|--|--|--|
| | stays, particularly B&B. | and duration of stays is increasing. TA stays are known to have negative impacts on health, wellbeing and educational outcomes. | <ul style="list-style-type: none"> • Improve throughput – cut void times and move people on to long term housing more quickly. • Reduce use of out of area B&B placements. • Establish units of Dispersed temporary accommodation outside Bath. |
| 3 | Improve likelihood of successful tenancies | Even with support some tenancies fail. We need to reduce the incidence of evictions from all tenures. | <ul style="list-style-type: none"> • Ensure tenancy training is appropriate and current. Review with training providers. • Establish a pathway through training to long-term accommodation • Improve awareness of work & training opportunities – increase incomes. • Ensure that formerly-homeless or otherwise vulnerable people are able to integrate into the local community by improving links to community navigation services, via for example the Wellbeing College, Wellbeing Options or social prescribing. |
| 4 | Improve accommodation options for vulnerable women who sleep rough or are at risk of sleeping rough. | Whilst the numbers of women in Rough Sleeper Counts are consistently lower than men, the numbers are significant. The support needs and levels of complexity amongst women rough sleeping are known to be higher than men. | <ul style="list-style-type: none"> • Review current provision for suitability for vulnerable women, eg Housing First • Consider options for development of gender-specific provision. • Identify and earmark resources to deliver units of accommodation and support for women and couples. |
| 5 | Improve our understanding of the pathway into and through homelessness services. | There is little shared or common data on use of advice and support services around homelessness. | <ul style="list-style-type: none"> • Establish a Task & Finish group to agree a data set for all Homelessness Partnership members. • Develop a better understanding of the causes of homelessness in our rural areas. • Quarterly reports to Homelessness Partnership on trends and outcomes. • Drive service developments and improvements to housing pathways. • Improve the quality of funding bids through better data. |

| | What we will do | Why we are doing it | What needs to happen |
|---|--|--|---|
| 6 | Identify new funding sources to ensure new rough sleeper provision continues | Whilst our success rate of securing additional funding in B&NES is high, better data would enhance bids further. Pressures on LA budgets; RSI funding not guaranteed after March 2020. | <ul style="list-style-type: none"> • Source new funding streams • Work more closely with the CCG, Virgincare and Public Health to identify common outcomes and funding opportunities. • Improve readiness to submit bids for funding. |
| 7 | Improve use of supported housing. | We have high relatively rough sleeper numbers. We need to create capacity in accommodation based services to enable move-on from Manvers Street hostel. There have been vacancies at some supported housing due to not enough people deemed ready/suitable or being too high-risk. | <ul style="list-style-type: none"> • Providers to collaborate on moves between supported housing to create vacancies at Manvers St Hostel • Offer of additional support from floating support and outreach services to ensure stability. |
| 8 | Agree a partnership approach to working with rough sleepers unable to access public funds (known as No Recourse to Public Funds – NRPF) | NRPF a thread through all rough sleeper work. It is an issue for providers, who provide support via voluntary donations. It also impacts on Safesleep provision/rough sleeping levels. | <ul style="list-style-type: none"> • Work with regional/national/government bodies to identify best practice. This has already started and will be further developed. • Agree criteria for access to services that does not discriminate but that ensures best use of resources |
| 9 | Investigate the extent and nature of homelessness, poverty and the impact of Continuous Cruising requirements on local 'liveaboard' communities. | We have evidence of hardship, including rough sleeping, from outreach services working with people living on the waterways. We also know that the requirement to move on a regular basis negatively impacts on health, employment and educational | <ul style="list-style-type: none"> • Support providers, health commissioners and Housing Services to identify service gaps and blockages; collaborate on best practice in working with 'liveaboard' residents; |

| | What we will do | Why we are doing it | What needs to happen |
|----|---|---|---|
| | | outcomes; a combination of these factors can lead to homelessness. | |
| 10 | Continue to develop affordable housing that meets the needs of homeless people. | Increasing numbers of households on housing register/in supported housing/TA. | <ul style="list-style-type: none"> • Investigate purchase of empty properties for use as social housing. • Promote shared options across all tenures. |
| 11 | Work with service users and providers to identify creative prevention approaches | To reduce repeat homelessness rates. | <ul style="list-style-type: none"> • Improve early warning mechanisms that improve partnerships between accommodation and support providers – without compromising privacy • Support and accommodation providers to develop trauma-informed ways of working. • Look at options for specialist women’s services. • Work with criminal justice partners to deliver on national policy for offenders on release. |
| 12 | Improve the focus and impact of services | The service user voice tends only to be heard by individual agencies. A more strategic approach to hearing of lived-experiences is needed if we are to make any significant and effective change. | <ul style="list-style-type: none"> • Establish new service user feedback methods that enable real change in and across services and in our strategic approaches • Look at how the Homelessness Partnership can include the voice of service users in its routine work • Financial resources will be needed to underpin newly-developed approaches. Homelessness Partnership to consider how this might be secured. |
| 13 | Address the increase in mental health and substance misuse needs amongst homeless people. | Increases in the numbers of people living with both poor mental health and substance misuse issues. | <ul style="list-style-type: none"> • Work with Health and Public Health commissioners, service providers and users to identify gaps • Secure resources for a dual diagnosis outreach and in-reach service. |

3 STATUTORY CONSIDERATIONS

3.1 It is a requirement of the Homelessness Act 2002 to review homelessness every five years and produce a strategy to address its causes and impacts. This document fulfils this requirement.

4 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 4.1 Delivery of several actions under the Strategy, particularly around reducing rough sleeping, will be contingent on continued allocation of targeted funding from the Ministry of Housing, Communities & Local Government for this purpose. In 2019/20, this allocation was £360,160 and covers outreach provision, including mental health specialist support, a winter shelter, a rough sleeping prevention service working at the Emergency Department of the RUH, a rough sleeping co-ordinator and multi-agency support at the winter shelter.
- 4.2 Confirmation of allocation for 2020/21 is anticipated in January 2020. Indications given by the Ministry of Housing, Communities & Local Government are that the same or a slightly higher allocation can be expected, but this cannot be assumed. In the unlikely event that this is not confirmed, work will begin with contracted providers to plan for any necessary service reductions or terminations. All services are contracted directly by Housing Services and are subject to 3 months' notice

5 RISK MANAGEMENT

- 5.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

6 CLIMATE CHANGE

- 6.1 A small number of people approaching the Council because they are homeless are initially placed in B&B outside Bath & North East Somerset, principally in Bristol. By acting on the recommendations contained within the Review of Temporary Accommodation (referenced in the Strategy and priorities), this number will reduce. Provision within Bath & North East Somerset will reduce travel between the two cities. This will not only improve outcomes for those vulnerable individuals by making access to support easier, it will also contribute to the Council's targets around carbon neutrality and climate change.
- 6.2 Proposals within the same review to locate Dispersed Temporary accommodation units outside Bath would also contribute to carbon targets by reducing distances travelled to work and school for families accommodated in this type of accommodation.

7 OTHER OPTIONS CONSIDERED

- 7.1 None.

8 CONSULTATION

- 8.1 This report has been cleared by the s151 Officer and Monitoring Officer.
- 8.2 The Homelessness Partnership was involved in the identification of actions to be included in the Strategy and was consulted on the full document.

| | |
|-----------------------|--|
| Contact person | Ann Robins, Strategy & Performance Manager, Housing Services. 01225 396288 |
|-----------------------|--|

| | |
|--------------------------|-------------|
| Background papers | <i>None</i> |
|--------------------------|-------------|

| |
|--|
| Please contact the report author if you need to access this report in an alternative format |
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Bath & North East Somerset Council

Homelessness & Rough Sleeping Strategy 2019/24

Introduction

The Homelessness Act 2002 requires the Council to carry out a review of homelessness to inform the production of a homelessness strategy every 5 years. The review sets out the extent to which the population in our district is or is at risk of becoming homeless, assess the likely extent in the future, identify what is currently being done and identify what resources are available to prevent and tackle homelessness.

This Strategy sets out what homelessness looks like in Bath & North East Somerset and wider, how national trends and issues impact locally and how we intend to respond.

Bath & North East Somerset Council's recognises the impact homelessness has on individuals and families. Our Corporate Strategy Priorities reflect this, aims to put residents first and includes a focus on providing more homes.

Our Area

Bath & North East Somerset's borders extend from the outskirts of Bristol, south into the Mendips and east to the Southern Cotswolds and Wiltshire border, covering a geographical area of 135.2 square miles. The World Heritage City of Bath is the main urban area, acting as the commercial and recreational centre of the district. It is an international tourist destination and is one of the few cities in the world to be named a UNESCO World Heritage Site. The other main urban communities are Keynsham, a traditional market town that lies to the west of Bath and Midsomer Norton and Radstock, small historic market towns that have a strong heritage of mining and industry stemming from the North Somerset Coalfield. They form the centre of the area to the south, locally referred to as the Somer Valley. The rest of the district consists of 69 diverse rural communities of varying sizes and characteristics, 39 of which are in Conservation Areas, including a line of villages along the foothills of the Mendips, the Chew Valley in the west and Cotswold villages around Bath

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The resident population of Bath and North East Somerset is approximately 192,000, an increase of over 16,000 since 2011. The local population's age structure is similar to the UK's population as a whole. The local population's age structure is similar to the UK's population as a whole. However, there are a higher number of people aged between 20 and 24, highlighting the impact of having two universities within the district which increases the demand on the housing stock. Between 2001 and 2017, the growth in this age range accounted for nearly 50% of the area's population growth. Overall, the district's population is predicted to increase to 199,100 by 2037, an increase of 12% from 2012, with the most significant increases expected in older people.

Our Local Economy

Bath & North East Somerset continues to be one of the least deprived areas in the country, ranking at 269 out of 317 local authorities (1 is the most deprived). However, it is important to acknowledge that across the area there are growing gaps between the most and least prosperous. Deprivation levels are calculated by looking at 7 key indicators; income; employment; education; health; crime; barriers to housing & services and the living environment. Despite the overall picture of a prosperous and thriving area, there are pockets of deprivation that compare with some of the poorest in the country. As a whole, Bath and North East Somerset remains one of the least deprived local authorities in the country and continues to become relatively less deprived over time. However, within some areas, inequality is widening and deprivation remains significant. There are now two small areas within the most deprived 10% nationally, both in south-west Bath. (Source: Indices of Deprivation October 2019)

Unemployment remains low at 2.9%, lower than the national rate of 4.1% and marginally lower than the rest of the south-west (3.1%). (Source: Nomisweb.co.uk) In September 2019, there were 7,450 households in Bath & North East Somerset in receipt of 'out-of-work' benefits or Universal Credit.

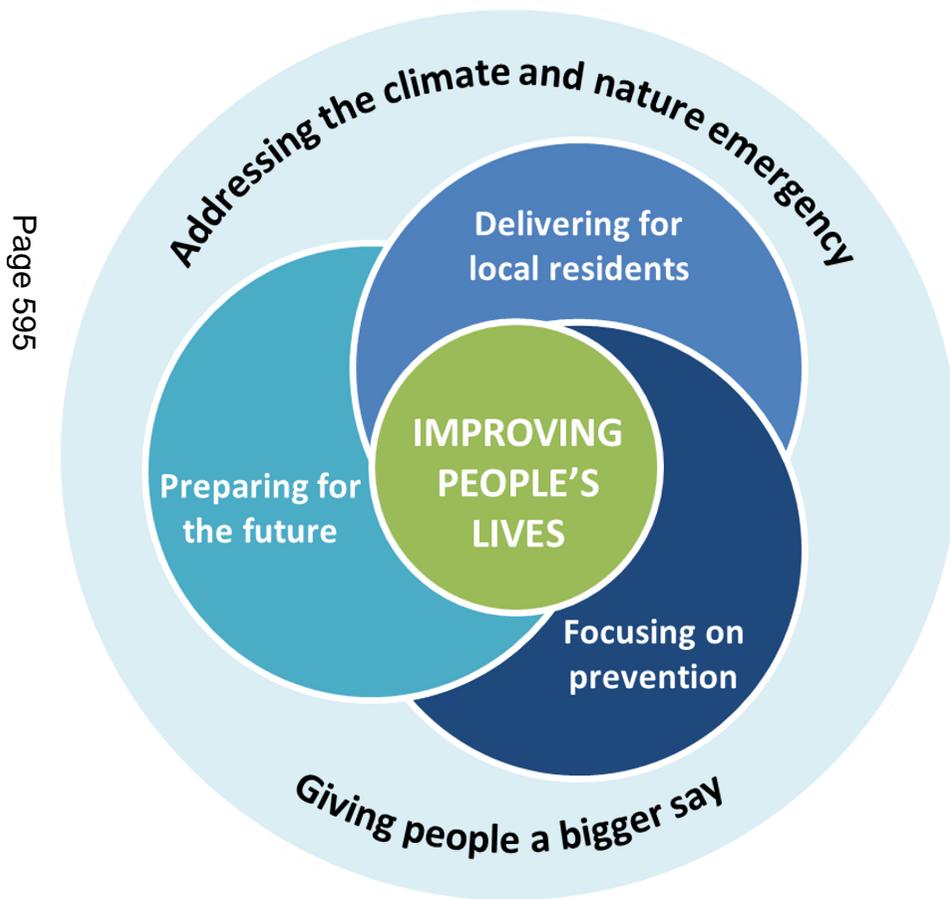
In September 2019, there were 7,450 households in Bath & North East Somerset in receipt of 'out-of-work' benefits or Universal Credit



Homelessness

A definition of homelessness is 'someone having no home; without a permanent place of residence'. It can also mean that a person or family has nowhere suitable for them to live, that they are not safe in their home or that they do not have a legal right to be there. The Council must assist people who are or may become homeless.

Corporate Strategy Priorities*



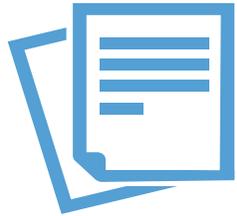
*Yet to be formally adopted

The Legal Context

The Homelessness Reduction Act 2017 came into force in April 2018. The Act reformed England's homelessness legislation and places a greater emphasis on the prevention of homelessness and on partnership working. Much of the work carried out by the Council's Housing Options & Homelessness team pre-empted the Act. For several years prior to the Act coming into force, the team worked on the basis that anyone facing housing difficulty could approach the team at any stage and receive advice and assistance that aimed to prevent or delay any housing crisis. This open approach to service delivery meant that there was little change to the approach taken, though processes and back-office structures were reviewed and changed to meet the new requirements. The biggest impact has been on the length of time each person presenting now requires from individual advisors, with in-depth solutions and Personal Housing Plans taking up a good deal of advisor time.

The Homelessness Reduction Act 2017 introduced the following:

The definition of being threatened with homelessness was extended from 28 days to 56 days. Although our Housing Options Team had for a number of years worked with people at the point they made contact about housing problems, the Act made this approach statutory.



For private rented tenants coming forward, we must accept a valid 'section 21' notice as evidence that the tenant is threatened with homelessness within 56 days.



A greater duty to give advice and information to a wider range of people at a much earlier stage than previously.



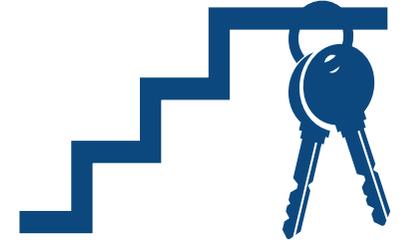
A new Duty to Refer, which commits public authorities to notify us of service users they think may be homeless or at risk of becoming homeless. This ranges from hospitals and prisons to colleges and the DWP.

Duty to assess all eligible applicants' cases and agree a plan (known as the 'personal housing plan').



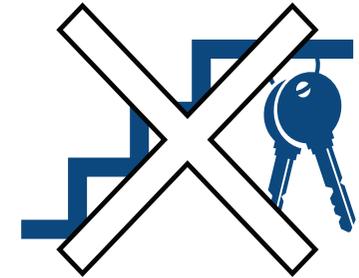
The creation of a stronger prevention duty for anyone threatened with homelessness and eligible for assistance. This can involve assisting them to stay in their current accommodation or helping them to find a new place to live.

A new relief duty which is available to all those who are homeless and are eligible regardless of whether they have a priority need. It requires us to take reasonable steps to help secure accommodation. This help could be the provision of a rent deposit or debt advice for example.



Incentives to people to engage in prevention and relief work by allowing councils to discharge their prevention and relief duties if an applicant unreasonably refuses to cooperate with the course of action set out in their Personal Housing Plan.

A right for us to discharge the prevention and relief duties if an applicant unreasonably refuses to cooperate with the course of action set out in their Personal Housing Plan.



A right to a review at the prevention and relief stages to ensure councils are held to account.

A requirement to collect data in order to monitor the overall effectiveness of the new legislation.

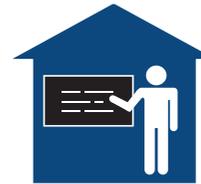


Review of last strategy

In 2019, a review of achievements from the last Homelessness Strategy was undertaken by the Homelessness Partnership Core Group. The full document is attached as Appendix 1. Under the strategic aims set out in the 2014/18 Strategy, the following changes have been made:



186 loans given to homeless people to help pay a deposit and rent in advance



'Tenancy-ready' training is in place for anyone in supported or temporary accommodation, as is Curo's Passport to Housing financial assessment and affordability tool.

20 shared housing spaces for young people created with the YMCA's 'Platform for Life'



Young people facing a housing emergency can be given a place to stay with a volunteer through a new project managed by the YMCA called 'Nightstop'.



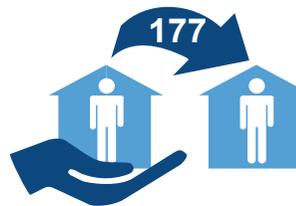
331 empty properties brought back into use through pro-active promotion and enforcement action.



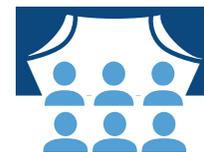
Advice and support around preventing homelessness is in all One Stop Shops in Bath and North East Somerset



177 people moved-on from supported housing to their own tenancy in social rented properties through AMOS, the scheme that gives more priority to people ready to live independently.



Licensing of houses in multiple-occupation in more areas of Bath; improving the standard of private rented housing in the authority.



11-13 year olds educated with the reality about homelessness through the Natural Theatre Company.

Increase access to affordable housing

Prevent homelessness

Ending rough sleeping



Seven 'Housing First' homes have been made available for rough sleepers with complex needs.



Advice and support is available in hospital to stop patients returning to living on the streets.

The Rough Sleeper Outreach Team is better placed to help people experiencing mental health trauma, substance misuse, and complex females because we have specialists working within team.



Safe Sleep, an additional night shelter, is established every year to ensure no-one sleeps rough during the winter months.



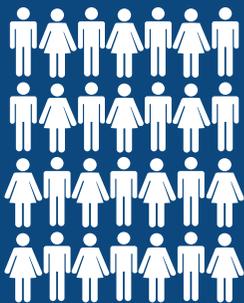
More than 200 people were helped to end their rough sleeping and return to live in their home local authority and access existing support networks.



85 rough sleepers helped to return to their existing tenancy either in, or outside of B&NES.



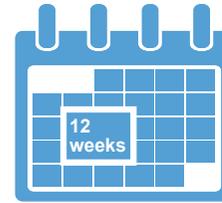
Average of 28 Streetlink referrals every month from members of the public alerting the Outreach Team to people rough sleeping.



Better specific accommodation and support for female rough sleepers provided by Julian House.



Support survivors of domestic abuse



Up to 75 survivors of domestic abuse every year take part in a 12-week 'Freedom Programme' to make positive changes and recover from domestic abuse.

A wider range of accommodation options available in B&NES, ensuring more choice.



Increase in refuge spaces with support to end the cycle of offending behaviour for women who have suffered trauma and homelessness.

Men can now access refuge in B&NES either as individuals or with their children



Provision of accommodation for people with complex needs fleeing domestic abuse, both as individuals and with their children.

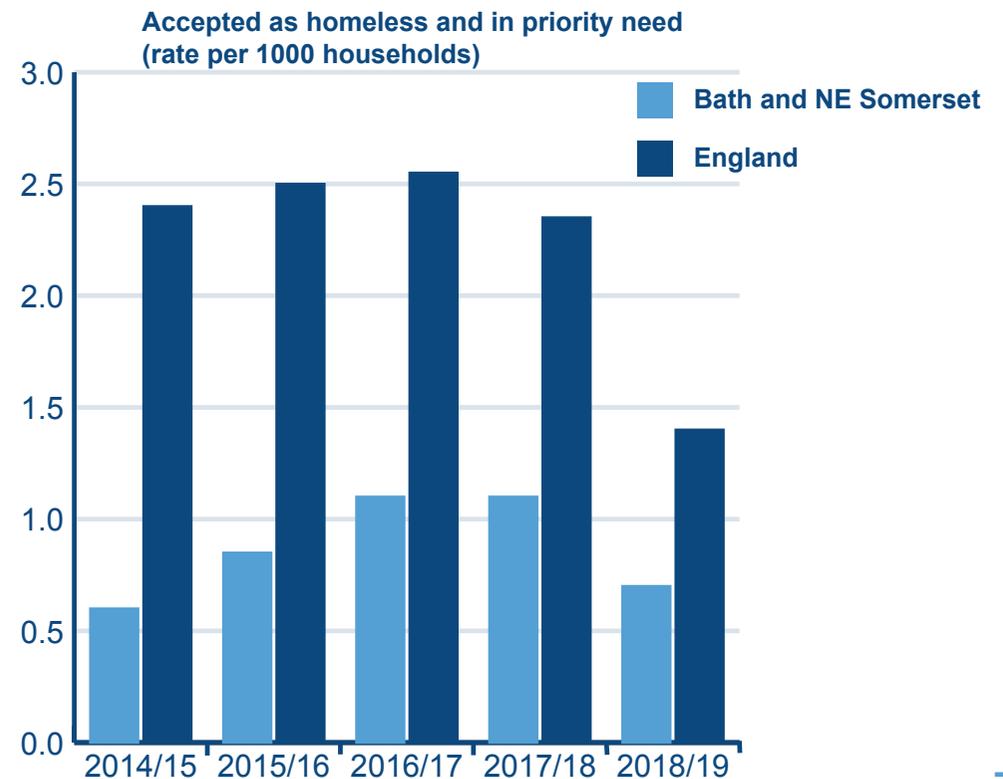
Homelessness & its causes

Homelessness has a wide range of causes and is commonly linked to financial insecurity or ongoing poverty, poor health and wellbeing, domestic abuse and family breakdown. In Bath & North East Somerset in 4 out of the last 5 years, the most common cause of homelessness has been loss of a private rented tenancy held on Assured Shorthold basis. Family no longer being willing to accommodate and non-violent relationship breakdown are the two next most common causes.

Bath & North East Somerset has a large private rented sector, estimated to be 27% of all stock in 2018, and in common with the national picture, security of tenure is not guaranteed. Assured Shorthold tenancies are easily ended and, with the correct procedures, there is no defence to a landlord's serving notice because the shorthold term has ended.

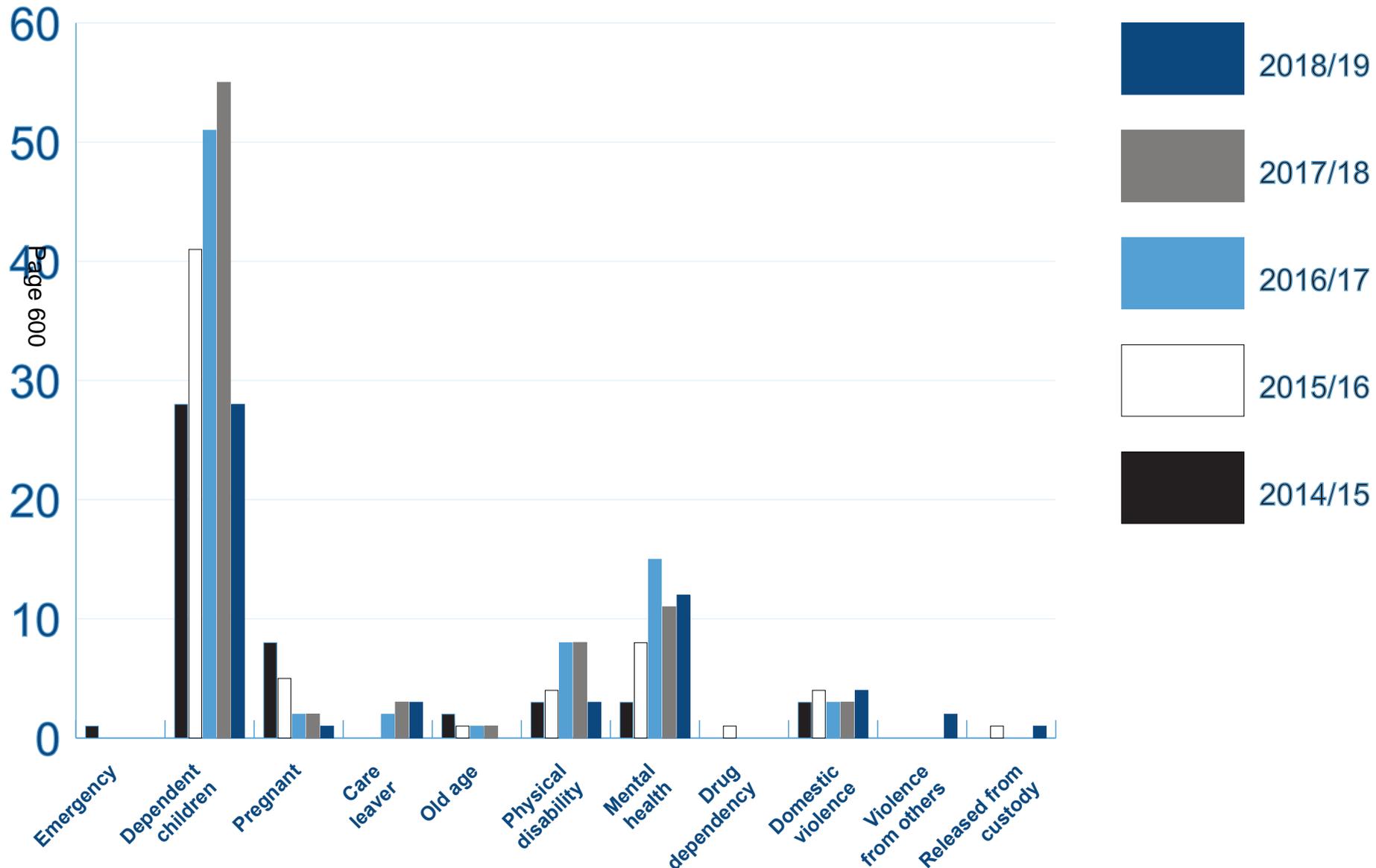
Homelessness in Numbers

The number of people coming to the Council to talk about housing and homelessness has risen steadily since 2014, with a small drop in 2018. The reasons for this are unclear, but could relate to uncertainty around the new legislation.



The main reasons for acceptances as being in priority need are also largely unchanged over the years, with the most common being having dependent children in the household. Whilst the numbers are low, mental health still represents the next most common reason. A lack of appropriate support continues to be a barrier to preventing loss of accommodation and in the provision and sustainment of temporary accommodation. Good working protocols with Leaving Care staff and providers of young people’s supported accommodation mean that young people and Care Leavers do not figure significantly in homelessness acceptance data.

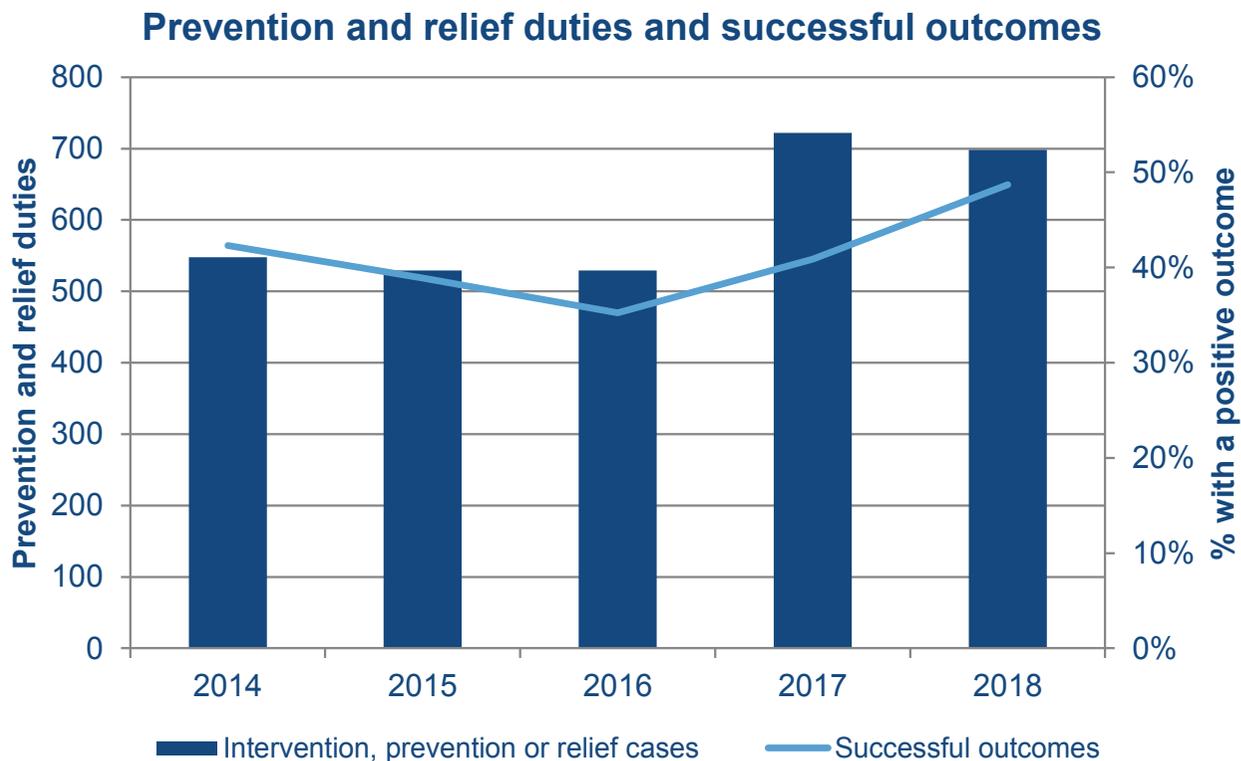
Households accepted by Reason for Priority Need



Preventing Homelessness & Providing Relief

Prevention of homelessness occurring in the first place is the main driver of the HRA and is central to the work of the Housing Options & Homelessness team. The level of successful outcomes has climbed since a relative low in 2015 and now represents over 48% of all presentations. Performance at a national (England) level for the same financial year was 50% of all presentations.

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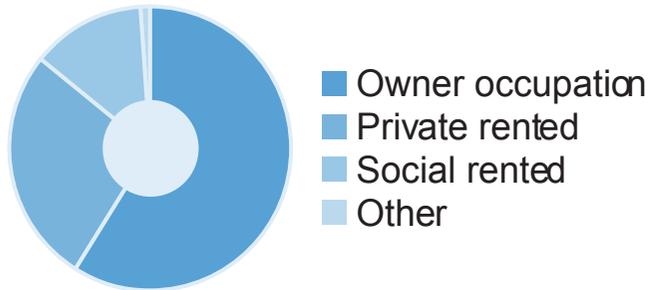


By working with anyone in housing difficulty as early as possible, the team are able to identify practical remedies and make best use of all possible resources.

We aim to improve on this by continuing to be accessible and open, working closely with partners and promoting the Duty to Refer.

Economy and Incomes - The Housing Market in Bath & North East Somerset

There are 83,019 dwellings in Bath and North East Somerset. 59% (49,335) are owner occupied, 27% (22,673) private rented and 13% (11,011) social rented.



The owner-occupied and private rented housing markets in Bath & North East Somerset continue to be very competitive. When comparing owner-occupation data across the region, based on sales and valuations between June and August 2019, the lower quartile house price in Bath & North East Somerset is currently £249,000, whilst the regional average for the same period is £191,300.

Within the owner-occupied market, in 2019, the average time a property stayed on the market was under 12 weeks, with an average of 96% achieving their asking price. Based on the average resale price in 2019 to date, the average price of a two-bedroom property in Bath & North East Somerset was £273,011.

Affordability in the private rented sector is acknowledged as a major barrier across the area and finding a new home to rent is expensive. Limits on how much rent can be covered by Universal Credit mean that the pool of affordable housing is further limited for households in receipt of welfare benefits. At September 2019, the typical weekly rents and Local Housing Allowance rates under Universal Credit by property are:

| Type of property | Typical weekly rent | Local Housing Allowance limit |
|-------------------------|---------------------|-------------------------------|
| Room in a shared house | £126.00 | £74.66 |
| 1-bedroom accommodation | £180.00 | £144.00 |
| 2-bedroom accommodation | £229.00 | £172.25 |
| 3-bedroom accommodation | £288.00 | £201.43 |
| 4-bedroom accommodation | £438.00 | £309.68 |

The figures below are based on data from Hometrack, the national housing market database. They are indicative rather than exact but give a broad picture of the levels of income needed for owner-occupied, private rented, affordable rented and social rented properties:

| | £ pw | Gross income needed* |
|---------------------|------|----------------------|
| Standard mortgage** | £274 | £40,709 |
| Private rent | £229 | £33,429 |
| Affordable rent | £136 | £20,206 |
| Social rent | £104 | £15,451 |

*based on 35% of gross income spent on housing

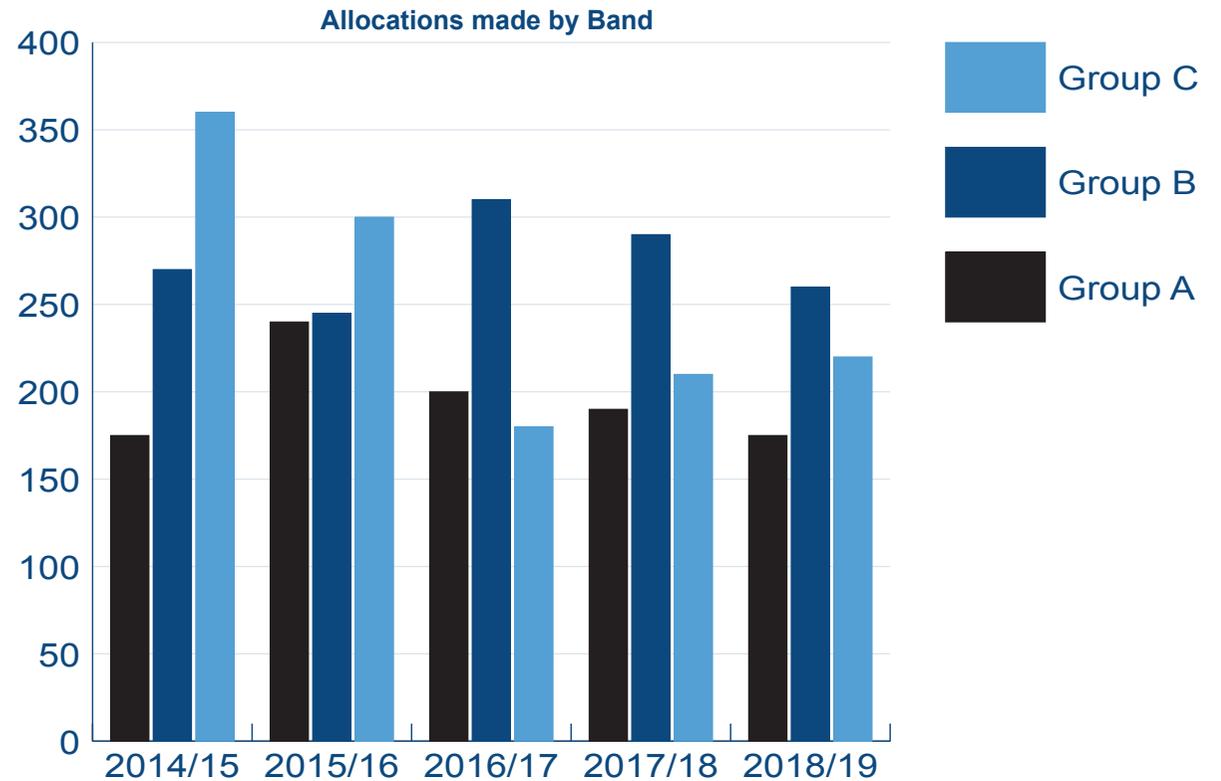
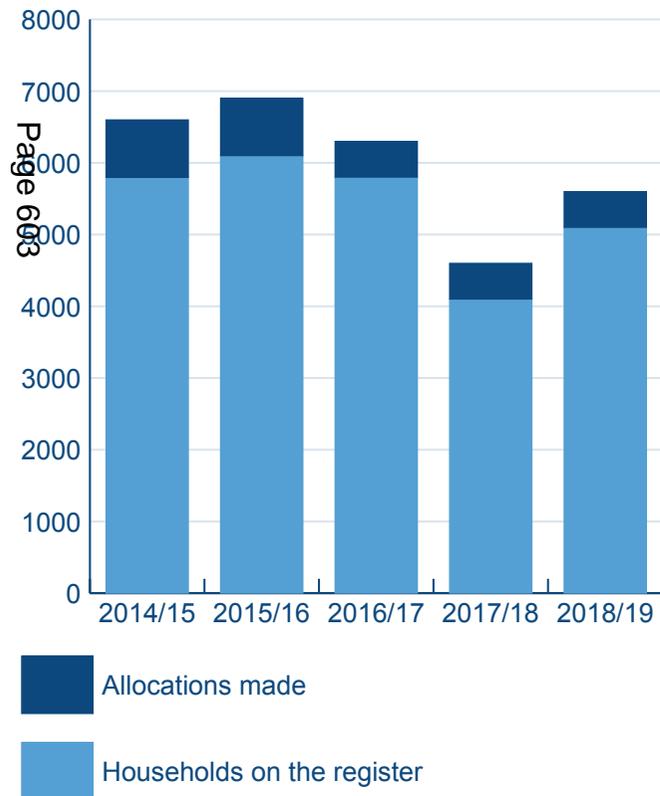
**based on average resale

The Bath & North East Somerset Council Core Strategy set a target of 3,400 new homes delivered across the area by 2026. The target for 2018/19-2020/21 is 600 new homes of all types and tenures. At September 2019, performance against this target was good, standing at 284 delivered in 2018/19 alone. 1,582 affordable homes of all tenure have been developed since 2011.

Since 2000/01, 1,072 Curo properties have been removed from the social rented stock as a result of Right to Buy (RTB). Coming from a high of 200 in 2002/03, RTB sales dropped to just 6 in 2018/19.

Homesearch, the Housing Register

Our local housing register, Homesearch, is a broad indicator of housing need for our area. Currently, there are 5,138 households on the register. As can be seen from the graph below, demand for affordable housing cannot be met by social rented provision. Prevention work is key to addressing growing need and the HRA is helping with this. Better access to the private rented sector also plays a large part in meeting need and though in the past this has been resisted by individuals and their advocates, it is now being recognised as the quickest and sometimes only route to rehousing.



Use of Temporary Accommodation

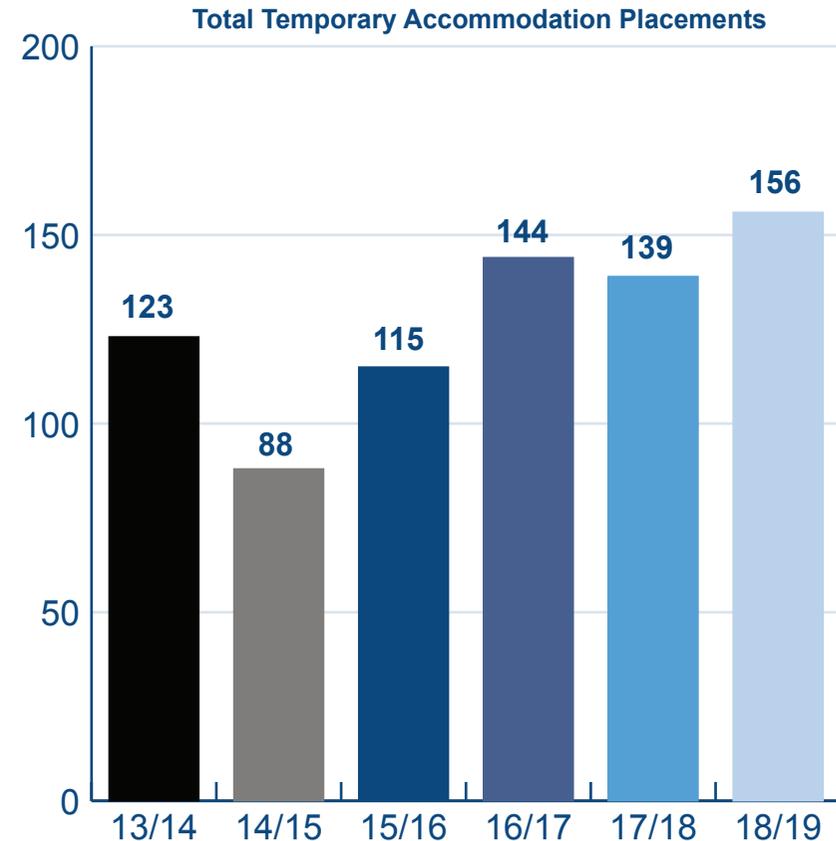
Bath and North East Somerset Council has a duty under Housing Act (1996) Part 7, to provide temporary accommodation for eligible homeless people and their families.

Temporary accommodation provided by the Council can include:

- Hostel accommodation occupied on a licence at Dartmouth Avenue, managed by Curo
- Dispersed flats occupied on an assured shorthold tenancy, owned and managed by Curo
- Bed & Breakfast accommodation, owned and managed by a range of private sector providers

It is Council policy to provide high quality temporary accommodation located in the district, or if that is not practical, as close as possible to the district and as close as possible to where the homeless household was previously living, so they can retain links with key services, such as schools and doctors. The aim of the Council's Temporary Accommodation Placement Policy is to try to avoid placing people in Bed and Breakfast and ensure that temporary accommodation is not in an isolated location away from public transport, shops and other facilities.

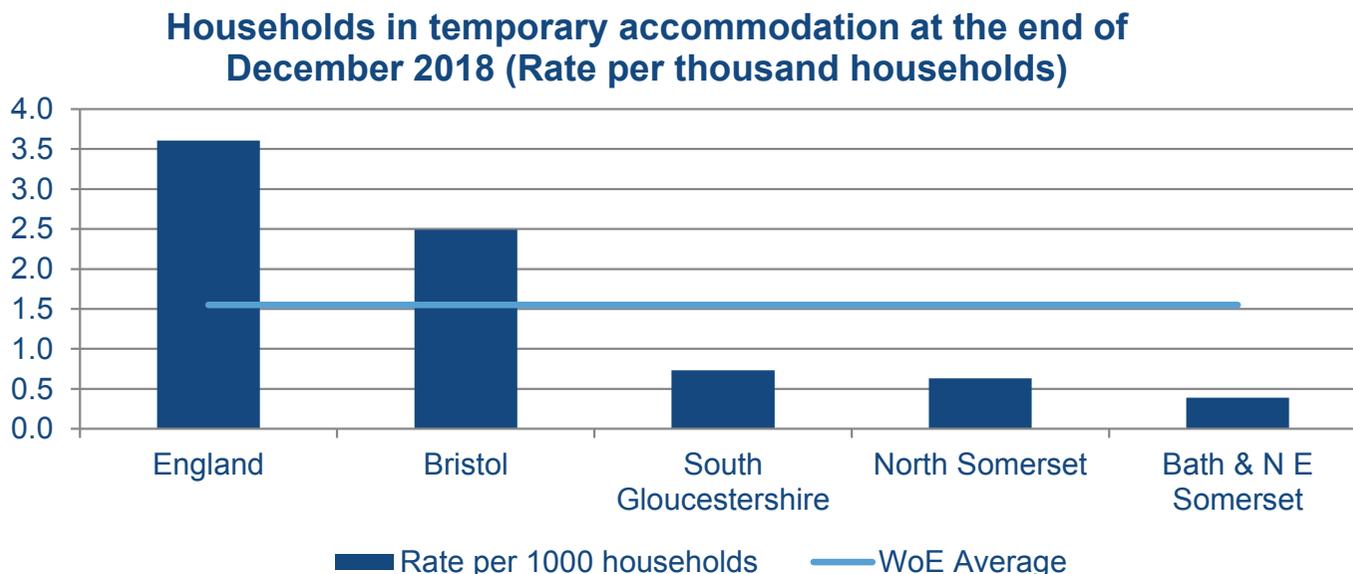
The following graph illustrates how the overall use of temporary accommodation has grown in recent years.



This table shows that performance around use of temporary accommodation is also good.

We are well below the West of England and all-England rates.

In 2019, a root and branch review of the use of temporary accommodation was completed by Housing Services. It can be read in full as Appendix 3.



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The following findings are the headlines:

- Use of temporary accommodation is continuing to increase, but Bath and North East Somerset Council remains among the 30 lowest ranked local authorities for use of temporary accommodation in England.
- Services are well managed and accommodation is generally of a good standard, but some processes could be reviewed to improve efficiency and value for money.
- The Council works well with providers of temporary accommodation but ongoing continuous improvement should be developed through regular discussion and review.
- Mixing families and vulnerable single people in the same hostel building does present challenges and needs to be addressed.
- Access issues at Dartmouth Avenue are being looked at to ensure facilities and allocation policies meet the needs of people with a disability.
- Move-on from the dispersed flats has slowed down significantly. This not only delays permanent rehousing but impacts on use of other forms of temporary accommodation.
- Dispersed flats need to be provided in areas other than Bath.
- The use of B&B is growing, especially for vulnerable single people. Most B&B provision is not within the district and this is problematic for this group of people, who often need to be near support networks and service providers within Bath & North East Somerset. The use of a property adjacent to Dartmouth Avenue is being looked at as an alternative to B&B for those individuals who present with greater life challenges.

Rough Sleeping in Bath & North East Somerset

Rough sleeping is the most visible form of homelessness and affects the most vulnerable people in catastrophic ways. The effects of rough sleeping are long-lasting and can mean the individual is caught in a downward spiral unless early and effective interventions are put in place. The government's national Strategy aims to end it by 2027, using an approach based around 'Prevent, Intervene and Recover'. Locally, we are aligned with this approach and have agreed an action plan for reducing rough sleeping, attached as Appendix 2, and will work with our partners to deliver on its aims.

Local Trends & Pressures

As stated above, rough sleeping numbers are high. This is covered by Appendix 2, the Rough Sleeping Action Plan.

Use of Temporary Accommodation is increasing, particularly by single people with complex needs.

In 2018/2019, 65% of people in temporary accommodation were living with a mental health related condition e.g. long-term depression, personality disorder, psychosis, schizophrenia, suicide risk, and 40% of customers were living with a diagnosis of two or more conditions. (for example; mental health, learning disabilities, drug/alcohol misuse, diabetes)

40% of people described themselves as disabled or having a disability which impacts on their life, and 70% of customers smoke and have another medical condition, such as a mental health issue or a physical health disease such as heart disease or cancer.

30% of people have been supported with domestic violence, and 25% have received support around offending behaviour. 25% of people to whom we have issued food bank vouchers were drug or alcohol users.

The higher support needs of this group, sometimes presenting as risky or disruptive behaviour, places pressure on the providers of TA and can cause distress, not least to other households in TA and the vulnerable person themselves. Mental ill-health and lack of appropriate support is an ongoing issue that affects individuals' ability to maintain the accommodation and of TA providers' ability to support them to succeed. Some work has already gone into improving cross-agency working between Curo and AWP to ensure a better understanding of the responsibilities and limits of both services and to jointly plan for individuals' support. This needs to be built on and strengthened if improvements in outcomes for people with complex needs and families are to be achieved.

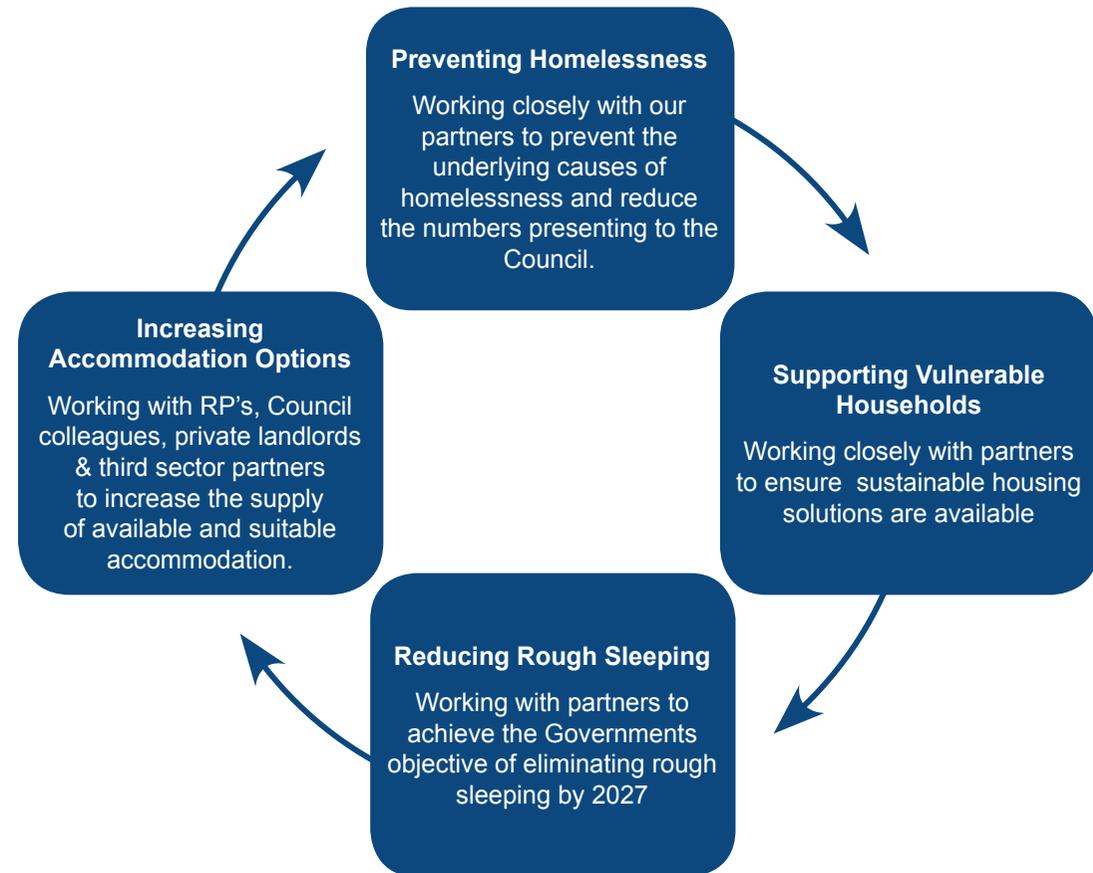
'No-fault' termination of Assured Shorthold tenancies continues as the top cause of homelessness in Bath & North East Somerset. With a buoyant private rented sector, the ability of low-income households to secure new tenancies is limited. We have a strong local offer in a dedicated officer sat within the Housing Options Team and a commissioned service providing zero-interest loans for deposits and rent in advance. Even with these resources in place, finding a landlord happy to accept families and vulnerable people who will rely on welfare benefits to meet the rent is a challenge, especially as the disparity between rents and Local Housing Allowance is so marked in Bath & North East Somerset. There is more work to do around engaging private landlords to understand what would change this. We are looking at how landlords might be incentivised to let to households coming through the Housing Options team and our partner-agencies. At a national level, government has said it will look at the impact of s21 notices and that it will consider legislative changes to address this.

Use of Housing-related Support needs to be better understood. We know that our local services are providing excellent services. What we cannot be assured of without further investigation is how services working with homeless people across Bath & North East Somerset might work together better. We need to understand the pathways people take and identify blockages and solutions in order to get better outcomes for more people and therefore best value out of the sector. The Homelessness Partnership has already started to bring together data that will enable a closer and more analytical approach to this.

Meeting the demand for affordable housing through our enabling role. It is clear that demand for affordable housing far outstrips supply. The challenge locally is high land prices and a very buoyant owner-occupation market. We need to find creative solutions that are attractive to developers and to people in need of housing.

Our strategy

The Homelessness Strategy for Bath & North East Somerset will be based around the following 4 principles:



Housing-related Support

Targeted help at the right time can prevent people from becoming homeless or help them re-establish a settled life and build up their resilience to change. HRS services can be provided to residents of specific properties or through 'floating support' schemes where the support is linked to the individual. Unlike many local authority areas, Bath & North East Somerset continues to commission housing related support services from a wide range of specialist and generic providers via the Community Services contract held with Virgincare. Services are commissioned via subcontract by Virgincare. Housing Services has strong links with contract managers in Virgincare and works closely to ensure that they are effective and appropriate. Extra to these contracts, due to funding from the government's Rough Sleeper Initiative, Housing Services directly contracts targeted services that work to reduce rough sleeping levels across Bath & North East Somerset. A full list of all services commissioned by the Council and via Virgincare can be found in the Rough Sleeping Action Plan at Appendix 2. In addition to the services commissioned via Virgincare to provide housing related support, voluntary and faith groups are also active in Bath & North East Somerset to support people in housing difficulty. The Housing Related Support Model is illustrated here:



Despite having diverse and effective provision of services providing housing related support, we are aware that there is a shortage of supported and specialist accommodation for people with complex needs. The section above covering Temporary Accommodation has more information on the impact of this issue and more work is planned to identify and reduce blockages.

Partnership Working

B&NES has a long history of partnership working. The list below represents just some of the groups working on homelessness and housing issues.

The *Homelessness Partnership* has worked for many years to co-ordinate responses to Homelessness, collect evidence of trends, develop joint funding bids and share good practice. With members from the housing and homelessness sector, advice & information, employment and training, criminal justice substance misuse, a Core Group of roughly 12 members carries out much of the work of the partnership.

Task & Targeting is a group of operational staff working mostly with entrenched rough sleepers for whom solutions are difficult to find. By sharing information on a confidential basis, the group aims to identify workable solutions for people whose needs are highly complex and who may have already tried most mainstream services, without any degree of success.

The *Complex Needs & Housing Group* meets bi-monthly. It is made up of people working in Housing Services, criminal justice, substance misuse, housing related support and supported accommodation. The aim is to ensure that barriers to housing solutions are minimised and that pathways away from substance misuse, offending behaviour and homelessness are as effective as possible.

The *Young People's Housing Group* includes Children & Young People Services (Social Services), Housing Services, supported accommodation and mediation service providers, advocacy groups, faith based groups. Similar to the Complex Needs & Housing Group, it aims to drive improvement through better understanding of the critical factors impacting young people that can cause or end their homelessness.

The B&NES Domestic Abuse & Violence Partnership (DAP) promotes education about healthy relationships, protection of victims, provision for survivors and disruption of perpetrators. It was formed in 2017 to establish stronger links across a wider range of partners including Public Health, Children and Families, Housing, survivors groups, offender management and criminal justice and the Police.

Nationally, government is looking at how local homelessness boards might address gaps in partnership working, improve practice and provision, join up sectors and reduce levels of all types of homelessness. This could introduce radical change to our partnerships, possibly adding weight and impetus, but possibly shifting the debate onto a higher strategic level. Should this develop, we will need to ensure all strategic partners and more importantly, those with lived experience, have a voice and are heard. Feedback has been given on how we would see this working at a local level and we await guidance from central government.

Strategic Links

Bath & North East Somerset Council Corporate Strategy 2016/20

https://www.bathnes.gov.uk/sites/default/files/bnes_corporate_strategy_2016-2020.pdf

National Rough Sleeping Strategy 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733421/Rough-Sleeping-Strategy_WEB.pdf

Bath & North East Somerset Joint Health & Wellbeing Strategy

<https://www.bathnes.gov.uk/services/neighbourhoods-and-community-safety/working-partnership/health-and-wellbeing-board>

Action Planning

In June 2019, Bath & North East Somerset Homelessness Partnership met to review the local position on homelessness. As part of the day, members were asked to give feedback on draft priorities and to identify gaps that needed to be closed in our strategic view. The following table sets out in no particular order the resulting priorities we intend to work on and why and how we will achieve this:

| No. | What we will do | Why we are doing it | What needs to happen |
|-----|--|--|--|
| 1 | Increase access to PRS | Move-on from all supported housing and TA has slowed down. Increase in rough sleeping levels and impact on Council budgets for TA. | <ul style="list-style-type: none"> • Consult with landlords to find out what would persuade them to work with us. • Consider how existing resources (eg Home Turf Lettings, Turnkey) can be further developed, using social investment and capital grants, to increase the pool of property available to homeless people traditionally excluded from the private rented market. • Investigate and pilot an incentives scheme for estate/lettings agencies securing PRS accommodation. Use Payment by Results model • Investigate purchase of properties for lease to Third Sector agencies |
| 2 | Improve the Temporary Accommodation offer and reduce duration of all stays, particularly B&B. | Use of all Temporary Accommodation and duration of stays is increasing. TA stays are known to have negative impacts on health, wellbeing and educational outcomes. | <ul style="list-style-type: none"> • Act on recommendations of the Review of Temporary Accommodation 2019. • Improve throughput –cut void times and move people on to long term housing more quickly. • Reduce use of out of area B&B placements. • Establish units of Dispersed accommodation outside Bath. |
| 3 | Improve likelihood of successful tenancies | Even with support some tenancies fail. We need to reduce the incidence of evictions from all tenures. | <ul style="list-style-type: none"> • Ensure tenancy training is appropriate and current. Review with training providers. • Establish a pathway through training to long-term accommodation • Improve awareness of work & training opportunities –increase incomes. • Ensure that formerly-homeless or otherwise vulnerable people are able to integrate into the local community by improving links to community navigation services, via for example the Wellbeing College, Wellbeing Options or social prescribing |
| 4 | Improve accommodation options for vulnerable women who sleep rough or are at risk of sleeping rough. | Whilst the numbers of women in Rough Sleeper Counts are consistently lower than men, the numbers are significant. The support needs and levels of complexity amongst women rough sleeping are known to be higher than men. | <ul style="list-style-type: none"> • Review current provision for suitability for vulnerable women, eg Housing First • Consider options for development of gender-specific provision. • Identify and earmark resources to deliver units of accommodation and support for women and couples. |

| No. | What we will do | Why we are doing it | What needs to happen |
|-----|--|---|--|
| 5. | Improve our understanding of the pathway into and through homelessness services. | There is little shared or common data on use of advice and support services around homelessness. | <ul style="list-style-type: none"> • Establish a Task & Finish group to agree a data set for all Homelessness Partnership members. • Develop a better understanding of the causes of homelessness in our rural areas. • Quarterly reports to Homelessness Partnership on trends and outcomes. • Drive service developments and improvements to housing pathways. • Improve the quality of funding bids through better data. |
| 6. | Identify new funding sources to ensure new rough sleeper provision continues | Whilst our success rate of securing additional funding in B&NES is high, better data would enhance bids further. Pressure on LA budgets; RSI funding not guaranteed after March 2020. | <ul style="list-style-type: none"> • Source new funding streams • Work more closely with the CCG, Virgincare and Public Health to identify common outcomes and funding opportunities. • Improve readiness to submit bids for funding. |
| 7. | Improve use of supported housing. | We have high rough sleeper numbers. We need to create capacity in accommodation based services to enable move-on from Manvers Street hostel. There have been vacancies at some supported housing due to not enough people deemed ready/suitable or being too high-risk. | <ul style="list-style-type: none"> • Providers to collaborate on moves between supported housing to create vacancies at Manvers St Hostel • Offer of additional support from floating support and outreach services to ensure stability. |
| 8. | Agree a partnership approach to working with rough sleepers unable to access public funds (known as No Recourse to Public Funds –NRPF) | NRPF a thread through all RS work. It's an issue for providers, who provide support via voluntary donations. It also impacts on Safesleep provision/rough sleeping levels. | <ul style="list-style-type: none"> • Work with regional/national/government bodies to identify best practice. This has already started and will be further developed. • Agree criteria for access to services that does not discriminate but that ensures best use of resources |

| No. | What we will do | Why we are doing it | What needs to happen |
|-----|---|--|--|
| 9. | Investigate the extent and nature of homelessness, poverty and the impact of Continuous Cruising requirements on local 'liveaboard' communities | We have evidence of hardship, including rough sleeping, from outreach services working with people living on the waterways. We also know that the requirement to move on a regular basis negatively impacts on health, employment and educational outcomes; a combination of these factors can lead to homelessness. | <ul style="list-style-type: none"> • Support providers, health commissioners and Housing Services to identify service gaps and blockages; collaborate on best practice in working with 'liveaboard' residents; |
| 10. | Continue to develop affordable housing that meets the needs of homeless people. | Increasing numbers of households on housing register/in supported housing/TA. | <ul style="list-style-type: none"> • Investigate purchase of empty properties for use as social housing. • Promote shared options across all tenures. |
| 11. | Work with service users and providers to identify creative prevention approaches | To reduce repeat homelessness rates. | <ul style="list-style-type: none"> • Improve early warning mechanisms that improve partnerships between accommodation and support providers –without compromising privacy • Support and accommodation providers to develop trauma-informed ways of working. • Look at options for specialist women's services. • Work with criminal justice partners to deliver on national policy for offenders on release. |
| 12. | Improve the focus and impact of services | <ul style="list-style-type: none"> • The service user voice tends only to be heard by individual agencies. • A more strategic approach to hearing of lived-experiences is needed if we are to make any significant and effective change. | <ul style="list-style-type: none"> • Establish new service user feedback methods that enable real change in and across services and in our strategic approaches • Look at how the Homelessness Partnership can include the voice of service users in its routine work • Financial resources will be needed to underpin newly-developed approaches. Homelessness Partnership to consider how this might be secured. |
| 13. | Address the increase in mental health and substance misuse needs amongst homeless people. | Increases in the numbers of people living with both poor mental health and substance misuse issues. | <ul style="list-style-type: none"> • Work with Health and Public Health commissioners, service providers and users to identify gaps • Secure resources for a dual diagnosis outreach and in-reach service. |

Bath & North East Somerset Rough Sleeping Action Plan 2019

1. Definition

Rough Sleeping is the most visible form of homelessness and has seen a significant increase nationally and at a local level over the last few years. This action plan sets out how the issue will be tackled within B&NES. Since 2010, the figures used for national statistics have used this definition of rough sleeping:

People sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or “bashes”).

The definition doesn't include; people in hostels or shelters, 'sofa surfers', people in campsites or other sites used for recreational purposes or organised protest, squatters or Travellers.

2. Numbers and profile of rough sleepers

In accordance with government requirements and using the definition above, B&NES Council conducts an annual survey of how many people are sleeping rough on a particular night. The figures for recent years were:

| | |
|------|----|
| 2014 | 27 |
| 2015 | 22 |
| 2016 | 25 |
| 2017 | 33 |
| 2018 | 20 |

In all but the rarest cases, all rough sleepers are known by name. In the last two Counts, only 1 person had not previously been offered services to end or alleviate their rough sleeping. All people sleeping rough included in the Counts have action plans in place to address their needs. The highlights of the demographic information from the 2017 and 2018 Counts are:

| Characteristic | 2017 | | 2018 | |
|------------------------------------|-----------|------------|-----------|------------|
| Gender | Male - 29 | Female - 5 | Male - 13 | Female - 7 |
| Under 25's | 1 | | 2 | |
| No Local Connection | 15 | | 12 | |
| Offered services previously | 33 | | 19 | |
| Known at the previous year's Count | 4 | | 2 | |
| Non-EU resident | 7 | | 0 | |
| Ex-services | 1 | | 0 | |
| Has accommodation but not using it | 1 | | 0 | |

Using this data and other, anecdotal intelligence we have identified the following trends:

- Bath and North East Somerset's rough sleeping levels have risen in common with most local authority areas. Bath city centre continues to see the largest concentration in terms of numbers,

but Midsomer Norton and suburban Bath have also seen a numerically small and intermittent but significant presence recently. Outreach has widened its service to take this into account.

- Whilst the majority of rough sleepers are men, over recent months, there are a growing number of women, most of whom have more complex needs than their male counterparts. There is very little women-only accommodation specifically for rough sleepers. The 4 female-allocated pods at Manvers Street are always fully used but their location and access to facilities is inadequate as they are shared with the male residents. Attempts have been made to create a women only house, however 5 beds is too high and most women were unable to sustain their accommodation due to male visitors and complex needs.
- Couples are increasingly complex, entrenched and challenging to house longer term. Control and coercion and domestic abuse can be factors in some relationships, made more difficult to tackle by rough sleeping.
- The introduction of the Homelessness Reduction Act and new approaches to prevention have strengthened partnership working with key providers. Improved outcomes are being achieved for people already or at risk of sleeping rough through co-location of outreach and Housing Services at the One Stop shop in Lewis House.
- The number of under-25's sleeping rough remains low, but more work is need to understand the pathway into and out of rough sleeping for younger people in Bath & North East Somerset. Parental evictions and County Lines activities need to be factored into plans for improvement.
- Services make contact with and support almost all rough sleepers. The very few people found in the annual Count two years running suggests a good rate of engagement. We are broadly satisfied that all services are appropriate and effective, if pressured at times in terms of delivery.
- Safesleep has been effective in reducing rough sleeping. Opportunities to capitalise on this by drawing individuals away from street based lives will be taken wherever possible. Action plans for each individual will ensure that accommodation and support options are found for anyone accessing Safesleep. Exit strategies for the service's seasonal end are put in place.
- An agreed approach is needed for those few rough sleepers who, because of their complex needs, cannot be accommodated even at times when the SWEP is in operation. Whilst very few in number (less than 5 is typical), the impact for individuals and the wider community can be significant.
- Case-working by outreach workers on local waterways is identifying people known to have slept rough now occupying sometime unsuitable and/or dangerous vessels. More work is needed on their pathway to homelessness and solutions that address their needs.
- Bedding and personal possessions left behind are an ongoing issue that has become more prominent with the increase in numbers. Discussions with the Council's Street Cleansing teams, Bath BID, Housing Services and Julian House have previously resulted in an agreed approach, but this needs to be included in our responses to rough sleeping. Options for storage and access to belongings need to be looked at again.

3. Current Provision – services

The strategic approach to reducing rough sleeping is threefold:

- Immediate, emergency pathways off the streets
- Longer term, sustainable accommodation options
- Support to sustain changes and rebuild lives

Bath & North East Somerset has a range of excellent services working with people sleeping rough, contracted either directly with providers using MHCLG grant, via subcontract with Virgincare as part of the Community Services contract or through other funding streams. In addition to a range of accommodation based longer term options (Appendix 1), the following specialist services are in place at April 2019:

| Service | Description | Provider |
|--|--|--|
| Manvers Street Hostel and Corn Street | Individual 'pods' for single homeless people, including 4 reserved for women. On-site support provided in addition to CCG-contracted GP practice. The aim is to stabilise lifestyles and enable moves into longer term accommodation. Corn Street provides move-on for people who have been able to stabilise at Manvers Street. It includes 1 room for a couple. | Julian House |
| Outreach | Daily street based engagement and support, including a MH clinician. | Julian House, DHI and Avon & Wilts MH team |
| Rapid Assessment & Reconnection Worker | Works with neighbouring local authorities and services, aiming to secure and maintain accommodation and support links and reduce people with no local connection coming into B&NES to sleep rough. | Julian House |
| Homelessness Prevention Worker | Works with complex need rough sleepers who have tenancies or those who are at risk of rough sleeping leading a street based lifestyle. B&NES is subject to County Lines investigations and so the post also works closely with the police to assist vulnerable people to regain control of their tenancy following cases of cuckooing which are on the increase locally. | Julian House |
| Women's Outreach Worker | Work with women currently or at risk of rough sleeping. | Julian House |
| Safesleep | 20 extra dormitory beds for rough sleepers including couples. Runs November – March only. This is a winter option aiming to reduce rough sleeping in the colder months and prevent deaths on the streets. | Julian House |
| Hospital Discharge Service | Based at the RUH and embedded within the ED ward, provides intervention at the point of discharge to avert rough sleeping, wherever possible. | DHI |
| Barnabas House | Supported housing for clients who have an entrenched history of homelessness and/or who have additional needs | Julian House |

| | | |
|-----------------------|---|---|
| Bespoke Housing First | Boat with intensive support for a particularly entrenched rough sleeper. Boat is owned by Julian House, who also provide daily support. | Julian House |
| Housing First | A home for life with wrap-around support to prevent loss of tenancy. Aimed at most entrenched and difficult to accommodate rough sleepers. | Partnership project – Curo/Julian House/DHI |
| SWEP | Severe Weather Emergency Protocol. In line with government requirements, provides emergency beds during severe weather. Aims to reduce winter deaths and take the opportunity to engage rough sleepers otherwise resistant to change. | Julian House |
| Flexible Support Pot | Enables a range of agencies to provide sessions at the point of access to Safesleep. The aim is to provide practical and potentially statutory interventions at the point of contact; mostly out of hours. | Housing services, CAB, DHI |
| Rent in Advance | Provides quick access to finances for rough sleepers offered social rented accommodation at short notice. | Housing Services |

In addition to the services above, Bath & North East Somerset Council, in partnership with the joint Julian House and DHI Outreach team, operates a Reconnection Policy. The full document can be read at: https://www.bathnes.gov.uk/sites/default/files/siteimages/reconnection_policy_2016_pdf.pdf, but the main principles align with the *No Second Night Out* approach and aim to ensure that valuable accommodation, support and personal networks are not lost when someone leaves the location they have connections to. A reconnection will only ever be made where it is safe for the person to return and where they have an established connection. In 2018/19, 46 people were assisted to return to locations where they had family, friends or other support and in many cases, suitable accommodation. Reconnection is not always accepted and in 2018/19, 13 people refused to take this offer. In this situation, a 'single service offer' of support and assistance is available, meaning that a plan is identified to assist in returning the person to their previous accommodation. No reconnections are forced and they are only ever arranged where available accommodation has been confirmed. This policy continues to provide a valuable access route for rough sleepers and service providers.

The Homeless Partnership is a group of senior leaders in statutory and voluntary organisations who ensure B&NES has a strategic approach to rough sleeping and can deliver one clear message to the public and clients alike. The local Task & Targeting Group feeds into the strategic group and is made up of key frontline services and service commissioners with ad hoc input from other agencies such as Police and Probation. The group meets regularly to unlock solutions for entrenched rough sleepers. Through problem-solving and under agreed confidentiality arrangements, options are identified for known individuals.

4. Future Plans and Resources

In broad terms and given the national increase in rough sleeping, the services currently in place are delivering what is needed. The challenge for the coming years is to make sure those services are able to stay in step with demand. Funding received from MHCLG enabled improvement and extension of services and the impact was seen immediately in 2018/19. Bath & North East Somerset Council action plan for 2019/20 is as follows:

| What | By Whom | By When |
|--|--|----------------|
| Repeat delivery of the Safesleep service from November 2019-March 2020. | Julian House | November 2019 |
| Extension of the Housing First provision (currently aiming for 5 by March 2019) to provide 8 further units in 2019/20. | Curo, Julian House and DHI | March 2020 |
| Identify gaps in current provision for women and couples at risk of rough sleeping. Agree an approach to address gaps. | Housing Services | September 2019 |
| Develop a 'lessons learned' good practice sharing approach for the MH aspects of outreach | Housing Services, AWP, Julian House, DHI | September 2019 |
| Continue to provide the Rapid Assessment & Reconnection Service. | Julian House | April 2019 |
| Embed the RUH Discharge service assessment and support processes within the clinical teams. | DHI | April 2019 |
| Agree an approach to working with rough sleepers who are categorised as having No Recourse to Public Funds. | Homelessness Partnership Core Group – Task & Finish Group | October 2019 |
| Agree an approach to high risk rough sleepers not accommodated under SWEP | Housing Services, Julian House and DHI | September 2019 |
| Agree a process for dealing with personal possessions and abandoned bedding at rough sleeping sites. | Housing Services, Cleansing & Parks, B&NES Council, Julian House | February 2019 |
| Work with local prisons to identify improvements to pathways that reduce rough sleeping | Housing Services, HMP Bristol, Eastwood Park and HMP Erlestoke | April 2019 |

5. Monitoring our progress

We need to understand what works, what is less effective and why. To this end, we will continue to submit monthly data and bi-monthly Rough Sleeper Counts to MHCLG and to liaise with Rough Sleeping Co-ordinators on progress. We have a calendar of meetings arranged with providers to analyse all relevant data for effectiveness, emerging trends and to agree any necessary modifications to service delivery.

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| Bath & North East Somerset Council | | |
|---|---|--------------------------------------|
| MEETING/ DECISION MAKER: | Cabinet | |
| MEETING/ DECISION DATE: | 16th January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3188 |
| TITLE: | Claverton Neighbourhood Development Plan | |
| WARD: | Claverton | |
| AN OPEN PUBLIC ITEM | | |
| List of attachments to this report: | | |
| Appendix 1: Draft Claverton Neighbourhood Plan – available at: https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/NPP/claverton_ndp_referendum_version.pdf | | |

1 THE ISSUE

- 1.1 Following the successful examination and referendum, this report seeks to make and bring into force the Claverton Neighbourhood Plan (Appendix 1), so that it will be used by the Local Planning Authority to help determine planning applications within the Neighbourhood Area.
- 1.2 Claverton Parish Council is the qualifying body authorised to act in relation to the Neighbourhood Plan.

2 RECOMMENDATION

Cabinet is asked to agree to:

- 2.1 Make and bring into force the Claverton Neighbourhood Development Plan, as set out in Appendix 1 (see link above), as part of the Development Plan for the Claverton Neighbourhood Area, in accordance with Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011 and the Housing and Planning Act 2016).

3 THE REPORT

- 3.1 Claverton Parish Council indicated that they would like to undertake a Neighbourhood Development Plan (NDP) and the Neighbourhood Area, the first formal stage in the process, was designated by the Council on 18th October 2017. The Plan was considered by an Independent Examiner in August 2019, who recommended that it should proceed, with modifications, to the final stage, the referendum.

Claverton NDP Referendum

3.2 The referendum took place on the 12th December 2019. In accordance with the regulations, the question posed in the referendum was:

'Do you want Bath & North East Somerset Council to use the neighbourhood plan for Claverton to help it decide planning applications in the neighbourhood area?'

3.3 There was a 74.5% turnout of the overall Neighbourhood Area electorate. A majority (93%) were in favour of using the Claverton NDP to help decide planning applications in the Neighbourhood Area.

Compatibility with EU Legal Obligations & Human Rights

3.4 The Council does not have to bring the Plan into force if it is considered that the making of the Plan would breach, or be incompatible, with any EU obligations or the European Convention on Human Rights (Section 38A(6) of the Planning & Compulsory Purchase Act 2004).

3.5 The Independent Examiner considered this issue and concluded that, subject to the recommended modifications (all of which have been incorporated into the final draft of the Plan), the Plan would not breach or be incompatible with any EU laws or the European Convention on Human Rights. The Council's Legal Services have reviewed the Plan and concur with the examiner's view. As such, it is considered that the legal duty under Section 38A(4) Planning and Compulsory Purchase Act 2004 applies in this case.

Making the Neighbourhood Plan and bringing it into force

3.6 In accordance with Section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended) the Council has a duty to make the Claverton Neighbourhood Plan part of the Development Plan. The Development Plan is the framework for determining planning applications in B&NES (and currently comprises the Core Strategy (2014); Placemaking Plan (2017); Saved Policy from the 2007 B&NES Local Plan; the Joint Waste Core Strategy; and already made Neighbourhood Plans). This will mean that the Claverton Neighbourhood Plan will have full statutory weight in decision making on planning applications.

3.7 It is recommended that the Council makes the Plan and brings it into force.

3.8 The Council must also publicise (on the web site or in any other manner to bring it to the attention of those who live, work or carry on business in the Neighbourhood Area) their decision on the Neighbourhood Plan and the reasons for that decision in a 'Decision Statement' (Section 38A(9) of The Planning & Compulsory Purchase Act 2004 & Regulation 19 of the Neighbourhood Planning (General) Regulations 2012). Under delegated authority the Divisional Director – Development & Public Protection will issue a Decision Statement. The Council must also publish where and when the Decision Statement can be inspected and send a copy to Claverton Parish Council. The Decision Statement will be published on the B&NES website and will be made available for inspection in the following locations:

- Bath One Stop Shop's Reception
- Bath Central Library
- St Mary's Parish Church, Claverton

Call In

3.9 The Council has a legal duty to make the Plan and bring it into force within 8 weeks once it has been approved at referendum. It is therefore considered that this decision falls within the exceptions to call in contained in rule 5 of the Call In Procedure Rules, namely, that the effect of call in would be to cause the Council to miss the statutory deadline.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 The Localism Act 2011 has reformed the planning system to give local people new rights to shape the development of the communities in which they live.
- 4.2 The Act provides for a new type of community-led initiative known as a Neighbourhood Development Plan which sets out the policies on the development and use of land in a parish or 'Neighbourhood Area'.
- 4.3 The Council has a duty to assist communities in the preparation of Neighbourhood Development Plans and orders and to take a Plan through a process of examination and referendum and to bring the Neighbourhood Plan into force. This duty includes making the plan as soon as is reasonably practicable but in any event within 8 weeks after the referendum approving the plan has taken place.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The main costs of producing the Claverton Neighbourhood Plan related to in-kind technical support provided, plus the costs of the external examination, referendum and associated printing costs. These costs will be funded through a £20,000 Government Neighbourhood Planning Grant, which will be received by the Council by the end of this financial year (Neighbourhood Planning Grants are paid quarterly).
- 5.2 All other minor costs associated with supporting the preparation of the Neighbourhood Development Plan have been covered within the existing LDF budget.
- 5.3 Significant community resources have been invested into the Claverton Neighbourhood Plan preparation, including substantial volunteer time.
- 5.4 Once the Neighbourhood Plan is made, Claverton Parish Council will receive 25% of CIL payments for development within their Neighbourhood Area, in line with the CIL Regulations (rather than the typical 15%).

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7 CLIMATE CHANGE

- 7.1 A key objective of the Neighbourhood Plan is to safeguard and enhance the biodiversity and natural habitat within the Parish and encourage measures to reduce its carbon footprint and increase resilience to climate change. This is implemented through policies proposed in the Plan; for example the Plan introduces policies relating to maximising energy efficiency and renewable energy generation on a scale which is sympathetic to visual character of the Parish.

8 OTHER OPTIONS CONSIDERED

- 8.1 No other options were considered given that the Council has a duty to make the Plan and bring it into force.

9 CONSULTATION

- 9.1 The Monitoring officer, Section 151 officer and Corporate Director have been given the opportunity to review this report and have cleared it for publication.
- 9.2 Considerable consultation has been undertaken alongside the preparation of the Plan:

- Representations were invited with regard to the designation of the neighbourhood area covering Claverton for a 6 week period and the area was designated on 18th October 2017.
- Representations were also invited with regard to the Draft Neighbourhood Plan for a six week period from 24th May 2019 to the 5th July 2019
- On 12th December 2019 the Neighbourhood Plan was subject of a community Referendum. Everyone who was registered to vote within the Parish was given the opportunity to vote on whether the Plan should be 'made' by the Council.

9.3 No additional consultation has taken place or is necessary with regard to the recommendation of this Report; at this stage the only publicity required is in line with paragraph 3.8 above.

| | |
|--|--|
| Contact person | <i>George Blanchard - 01225 477684 or Richard Daone 01225 477546</i> |
| Background papers | <p><i>My Neighbourhood: A Neighbourhood Planning Protocol for Bath & North East Somerset</i></p> <p>http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/NPP/npp_my_neighbourhood_adopted_2014.pdf</p> <p><i>Claverton Neighbourhood Plan Area:</i></p> <p><i>Neighbourhood Plan Evidence Base and other Background documents:</i></p> <p>https://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/neighbourhood-planning-protocol-my-neighbourh</p> |
| Please contact the report author if you need to access this report in an alternative format | |

| Bath & North East Somerset Council | | |
|---|--|-----------------------------------|
| DECISION MAKER: | Cabinet | |
| DECISION DATE: | 16 January 2020 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3149 |
| TITLE: | Decision to complete Transfer Agreement with Aequus Companies | |
| WARD: | All | |
| AN OPEN PUBLIC ITEM with EXEMPT APPENDIX | | |
| <p>List of attachments to this report:</p> <p>Exemption Certificate - Information Compliance Ref: LGA 1902/19</p> <p>EXEMPT APPENDIX - Transfer Agreement (Exempt by virtue of Para 3 SCHEDULE 12A Local Government Act 1972 - information relating to the financial or business affairs of any particular person)</p> | | |

1 THE ISSUE

1.1 To approve the agreement to transfer staff and resources to the Council's housing development companies and provide a pension guarantee.

2 RECOMMENDATION

The Cabinet is requested to;

2.1 Authorise the Council entering into the Transfer Agreement with the Council's housing companies.

2.2 Delegate to the Director of Finance in consultation with the Corporate Director, Director of Legal and Democratic Services, and the Cabinet Member for Resources authority to make minor amendments to the Transfer Agreement, if required, and do all acts necessary to effect the transfer of staff and resources

and complete the pensions guarantee in accordance with the terms of the Transfer Agreement.

3 THE REPORT

- 3.1 The proposal to set up a local authority wholly owned company to develop, deliver, own and manage property as well as new development on a case by case basis, was approved by the Cabinet on 2 December 2015
- 3.2 In approving the establishment of Aequus, the Cabinet agreed a number of objectives which are captured in the legal agreements for the company. These objectives recognise the potential financial, housing supply, affordable housing provision, sustainability and market differentiation of the company as follows-
 - 3.2.1 To generate revenue income and maximise revenues for the Council;
 - 3.2.2 To deliver approved property developments;
 - 3.2.3 To acquire and sell private market property;
 - 3.2.4 To hold, manage and operate high quality private lettings;
 - 3.2.5 To be fully policy compliant in terms of Affordable Housing;
 - 3.2.6 To support the Council's ambition to help create an ongoing supply of modern energy efficient and sustainable homes;
 - 3.2.7 To stimulate and accelerate property and development delivery for the Council;
 - 3.2.8 To improve supply, quality and quantity of private rented housing;
 - 3.2.9 To act as a responsible and equitable landlord;
 - 3.2.10 To deliver long term capital appreciation;
 - 3.2.11 To support the Council's strategic vision and objectives.
- 3.3 Following the decision, Aequus Developments Ltd was formed in March 2016 to focus on the management of the properties for the Private Rented Sector above the commercial estate
- 3.4 Aequus Construction Ltd was subsequently formed in June 2017 following the approval by both the Shareholder and the Company Board (the "double lock" approval process) to the business case for the development of the old Riverside Office Building in Keynsham.
- 3.5 The Council's Medium Term Financial Plans include significant (and sustained) revenue income from Aequus which, with the support of the Council, the companies will be able to achieve and potentially significantly exceed if the appropriate development pipeline is maintained.
- 3.6 The Council as Shareholder approved the 2019/20 to 2021/22 Business Plan for Aequus group of companies and the Remuneration policy for its directors and

employees on the 24 July 2019 which was based on a Transfer Agreement being in place from 1st September 2019.

- 3.7 Entering into the transfer Agreement with ADL and ACL (the Company) will enable staff to transfer from the council to ADL and will provide a mechanism for the transfer of properties to ADL and development sites to ACL in order to ensure that the staff transferred remain actively engaged in order to deliver on the significant and sustained revenue income targets set for them whilst also supporting the Council's strategic vision and objectives.
- 3.8 By entering into the Transfer Agreement the Council will transfer the 8 staff (schedule 11) to the Company to be directly employed by it on the same terms and conditions at present but with a remuneration policy that provides a limited bonus linked to the success of the business. The Service presently provided by the seconded staff will also transfer to ADL for a period of 10 years with a provision of 5 years rolling renewal.
- 3.9 The Council will ensure that the pension liabilities for the staff transferred are fully funded at the date of transfer. The Company will then be responsible for the payment of employer's pension contributions. The Council will also provide a guarantee to the Avon Pension Fund regarding any shortfall at the date of termination of the contract but will also benefit from any excess. This enables the Company to maximise the payment of dividends but also enables it to borrow from the market in the event this is required and approved by the Council as shareholder.
- 3.10 The Council intends to transfer on licence the Development Sites (Site) listed in Schedule 4 and the Residential Units (RU) listed in Schedule 5, as and when these are returned by the residential social landlords, to the Company for a period of 1 year (extendable by agreement) during which ADL will undertake site investigations and work up a business case to be approved by the Cabinet/Cabinet member. The business case will provide for the transfer of a site at market value but provision is made for disposal at less than market value in the event the disposal meets the requirements of the General Disposal consent i.e. up to £2 million less than market value where the Council is satisfied that Economic, Social or Environmental purposes are being met.
- 3.11 A business case is approved by the Council as shareholder but also by the Council as landowner and lender. The Transfer Agreement provides a mechanism, via a development agreement (DA), to enable the Council to specify the type of housing constructed and contractually ensures this is delivered. ADL/ACL is entitled to gross profits of up to 20% of the costs of development (the actual figure being negotiated on each individual site) and reflected in the DA with any overage being paid to the Council. Company net profits are also ultimately paid as dividends to the Shareholder to meet the revenue targets set by the Council.
- 3.12 The Agreement provides for Future development sites to be identified by the Council and offered to the Company and the transfer of such sites will follow the same process as for the existing Sites.
- 3.13 Any dispute between the parties is resolved through a dispute resolution process but ultimately the decision of the Council's Chief Executive is final.

4 STATUTORY CONSIDERATIONS

4.1 Under the transfer agreement staff currently seconded to ADL by the council (8 people) will transfer to ADL for a period of 10 years and their transfer will take effect by operation of law pursuant to the Transfer of Undertaking & Protection of Employment Act (TUPE). Their employment rights will be protected and a pension guarantee will be provided by the council.

4.2 In order for TUPE to take effect the Council must transfer an Undertaking. In this case that is the development pipeline to enable the staff transferred to be actively engaged during the contract period. The transfer includes a mechanism to enable the properties and development sites to be transferred to ADL and ACL respectively. The mechanism replicates the processes required to effect transfers at present. In particular, the parties must agree a business case together with the consideration to be paid for the property or site to be transferred and in respect of sites a site specific development agreement that specifies what is to be built on the site transferred.

4.3 This decision is exempt from call in by virtue of Part 4. D-1 Rule 5 of the Constitution. i.e. the effect of the call-in alone would be to cause the Council to miss, or fail to comply with or fulfil, a deadline or duty. The Council committed to the Board of ADL the transfer of assets and staff on the 1 February 2020 and also has a duty of care to its staff to meet the deadline.

5 RISK MANAGEMENT

5.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

6 CLIMATE CHANGE

6.1 The objectives for the company are set by the Shareholder. The Council is the sole shareholder in ADL and therefore its wholly owned subsidiary ACL. The Business Plan for the Aequus group of companies commits to reviewing the objectives of the company in line with the council's commitment to become carbon neutral. The site specific business case for the Sladebrook Road development has already been modified, with Council support, to provide an exemplar site for all developers by inclusion of 2 affordable homes which is beyond current Council Policy requirements for the site and the 9 homes constructed will be low energy homes. Business Cases for Future development sites will build in the lessons learned from the exemplar site.

7 OTHER OPTIONS CONSIDERED

7.1 None. The transfer of staff and assets will be the culmination of all the previous steps taken to create a Council owned housing company that generates significant revenue for the Council and adheres to the objectives set by the Council as sole shareholder.

8 CONSULTATION

8.1 The Chief Executive, s.151 Officer, Monitoring Officer, Staff to be transferred.

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|--|--|
| Contact person | Martin Shields, Corporate Director Place, tel (01225) 396888 |
| Background papers | None |
| Please contact the report author if you need to access this report in an alternative format | |

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Access to Information Arrangements

Exclusion of access by the public to Council meetings

Information Compliance Ref: LGA 1902/19

Meeting / Decision: Cabinet

Date: Thursday 16th January 2020

Author: Martin Shields

Report Title: Decision to complete Transfer Agreement with Aequus Companies

Exempt Appendix - Transfer Agreement as negotiated between the parties which are B&NES Council and its housing company ADL and its wholly owned subsidiary.

The Report contains exempt information, according to the categories set out in the Local Government Act 1972 (amended Schedule 12A). The relevant exemption is set out below.

Stating the exemption:

1. Information relating to any individual
2. Information which is likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information)

The public interest test has been applied, and it is concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. It is therefore recommended that the exempt appendix be withheld from publication on the Council website. The paragraphs below set out the relevant public interest issues in this case.

PUBLIC INTEREST TEST

If Cabinet wishes to consider a matter with press and public excluded, they must be satisfied on two matters.

Firstly, they must be satisfied that the information likely to be disclosed falls within one of the accepted categories of exempt information under the Local Government Act 1972.

The officer responsible for this item believes that this information falls within the following exemptions and this has been confirmed by the Council's Information Compliance Manager.

The following exemptions are engaged in respect to this report:

1. Information relating to any individual
2. Information which is likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Secondly, it is necessary to weigh up the arguments for and against disclosure on public interest grounds. It is considered that there is a public interest in information about property acquisition being disclosed into the public domain. Other factors in favour of disclosure include:

- furthering public understanding of the issues involved;
- furthering public participation in the public debate of issues, in that disclosure would allow a more informed debate;
- promoting accountability and transparency by the Council for the decisions it takes;

Weighed against this is the fact that the exempt appendix contains strategic and financial information which could prejudice the commercial interests of the parties if disclosed at this time. There is also a real risk that the first Principle of the DPA will be breached by this disclosure, and that any individual/s identified could bring a successful action against the Council if the disclosure occurred

It is considered that the public interest is best served in this matter by not releasing this information at this time and that a significant amount of information regarding the matter has been made available on these issues – by way of the main report. Therefore it is recommended that exemptions as 1,2 & 3 applies. The Council considers that the public interest is in favour of not holding this matter in open session at this time and that any reporting on the meeting is prevented in accordance with Section 100A(5A).

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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