
**Bath & North East
Somerset Council**

Annex 1 – Bath Air Quality Action Plan Consultation Report

March 2010

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1. Introduction

The Consultation Draft Air Quality Action Plan for Bath was issued to stakeholders and published online in November 2009.

The action plan has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part. Present and likely future quality of the air is compared to the National Air Quality Objectives in particular for nitrogen dioxide (NO₂). Where these objectives have been exceeded in areas of public exposure, an Air Quality Management Area (AQMA) must be declared and subsequently an Air Quality Action Plan must also be undertaken.

Local Air Quality Management Policy Guidance (PG09) states:

'Local authorities must consult on their preparation of an air quality Action Plan after developing options with relevant key players such as transport planners, the Environment Agency or the Highways Agency. This opportunity should come when the local authority consults on completion of the further assessment of air quality in the designated area, consulting at the same time on a draft Action Plan if possible. This would allow them to finalise the plan in the light of consultees' comments. Action Plans may operate over long timescales and authorities may only be able to specify broad proposals in the first draft. It is an important principle, therefore, that they carry out a further consultation if they revise their initial proposals while carrying out the plan.'

The guidance also dictates that *'no consultation exercise should last less than eight to twelve weeks.'*

2. The Consultation

As suggested by the guidance, a steering group was set up involving other departments within the council. Meetings were held every two months prior to the publication of the Consultation Draft Air Quality Action Plan. This is scheduled to continue beyond the publishing of the final action plan.

The Draft Consultation Air Quality Action Plan was issued to DEFRA and key stakeholders in November 2009. The full list of stakeholders to whom an action plan was issued is contained in appendix A. In this case the consultation period ran from November 16th 2009 to January 15th 2010.

An informal public meeting was held on the 25th November between 4.30pm and 8.30pm at the Guildhall in Bath. A display was provided, which summarised the contents of the action plan, including monitoring data and air pollution dispersion modelling results. All related consultation documentation was available and three Council officers were in attendance to answer questions.

In addition to the Consultation Draft Air Quality Action Plan, a leaflet was produced that summarised the proposed actions in the plan and requested a response using the questionnaire which was provided as an insert. The leaflet is contained in Appendix B. A sample of the questionnaire is provided below.

DRAFT BATH AIR QUALITY ACTION PLAN**Bath & North East
Somerset Council****FEEDBACK AND SUGGESTIONS***Please indicate your opinion about the actions by circling the corresponding number.*

1 strongly disagree 2 disagree 3 neither agree nor disagree 4 agree 5 strongly agree

1. Bath Transport Package (P&R expansion, Rapid Transit & City Centre restrictions)

☹ 1 2 3 4 5 ☺

2. Trials of low emission buses on Park & Ride routes.

☹ 1 2 3 4 5 ☺

3. Review emission reduction and fuel additive technologies.

☹ 1 2 3 4 5 ☺

4. Feasibility study for a Low Emission Zone.

☹ 1 2 3 4 5 ☺

5. A Freight Consolidation Centre demonstration.

☹ 1 2 3 4 5 ☺

6. Management of freight vehicles in the City Centre.

☹ 1 2 3 4 5 ☺

7. Trials of an innovative cycle hire system in the City.

☹ 1 2 3 4 5 ☺

8. Expanding the City Car Club.

☹ 1 2 3 4 5 ☺

9. Improve building emission assessments and incorporate into planning requirements.

☹ 1 2 3 4 5 ☺

10. Investigate options for installation of electric vehicle charging points.

☹ 1 2 3 4 5 ☺

11. Feasibility study for use of titanium dioxide paint to reduce nitrogen dioxide.

☹ 1 2 3 4 5 ☺

Please turn over...

12. Introduction of an ECOStars Vehicle Recognition Scheme.

☹ 1 2 3 4 5 ☺

13. Studies on wayfinding and information systems.

☹ 1 2 3 4 5 ☺

14. Investigation into options for Rossiter Road and Widcombe High Street road layout alterations.

☹ 1 2 3 4 5 ☺

Q. Which congestion 'hot-spot' is nearest to where you live / work?

- London Road / Bathwick Street*.....
- Queen Square / George Street / Paragon area*.....
- Widcombe High Street area*.....
- Wells Road*.....
- St James's Parade*.....
- Windsor Bridge / Lower Bristol Road*.....
- Windsor Bridge / Upper Bristol Road*.....
- Newbridge*.....

Please provide any further comments and suggestions you may have in the box below:

Name (optional):	
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email (optional):	
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<p style="text-align: right;">Your details are protected under the Data Protection Act 1998</p> <p>Please respond no later than 15th January 2010 to:</p>
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Bath & North East Somerset Council, Environmental Monitoring, Public Protection, FREEPOST (BA1458), Bath, BA1 1ZZ.

Tel: 01225 396622

Email: environmental_monitoring@bathnes.gov.uk

The population within the extended AQMA based on 2.26 people per household as an average in the wards in the AQMA (according to census 2001), and approximately 3,800 households (from GIS data), is approximately

8,500. 1 leaflet and questionnaire was distributed to each household in the AQMA.






Consultees were asked to indicate their opinion about the listed actions by circling the number that corresponded to their level of agreement i.e. 1 = strongly disagree; 2 = disagree; 3 = neither agree nor disagree; 4 = agree; 5 = strongly agree. Consultees were asked to tick which congestion hotspot area they live or work nearest to and were also encouraged to leave comments and suggestions in the available space on the sheet.

3. Assessment of response

There were 128 questionnaire responses, from an estimated 3,800 posted. This equates to a return of approximately 4%. The responses are assessed by each action.

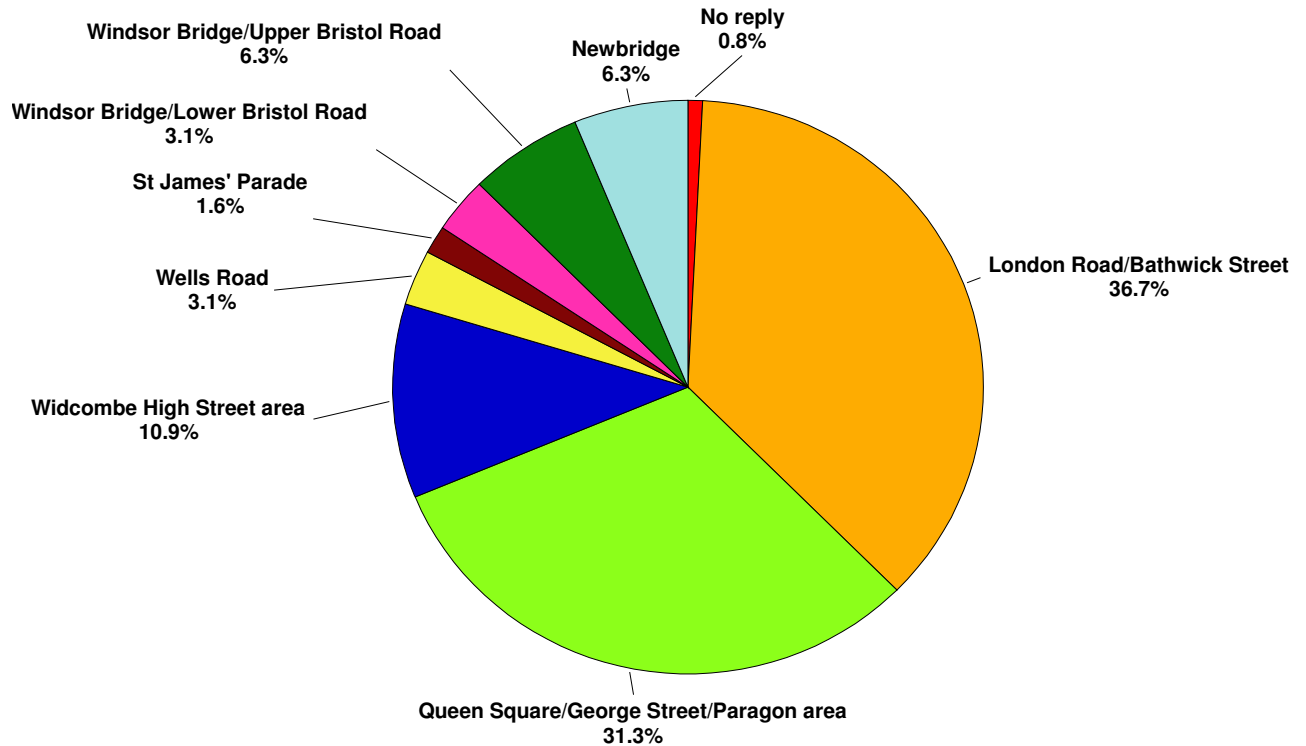
The action plan questionnaire responses were entered into 'Snap' survey software to enable a statistical analysis of the responses. This is done in the order that the proposed actions were entered on the questionnaire sheet.

The answers are represented by the following colours:

No reply	
Strongly disagree	
Disagree	
Neither agree nor disagree	
Agree	
Strongly agree	

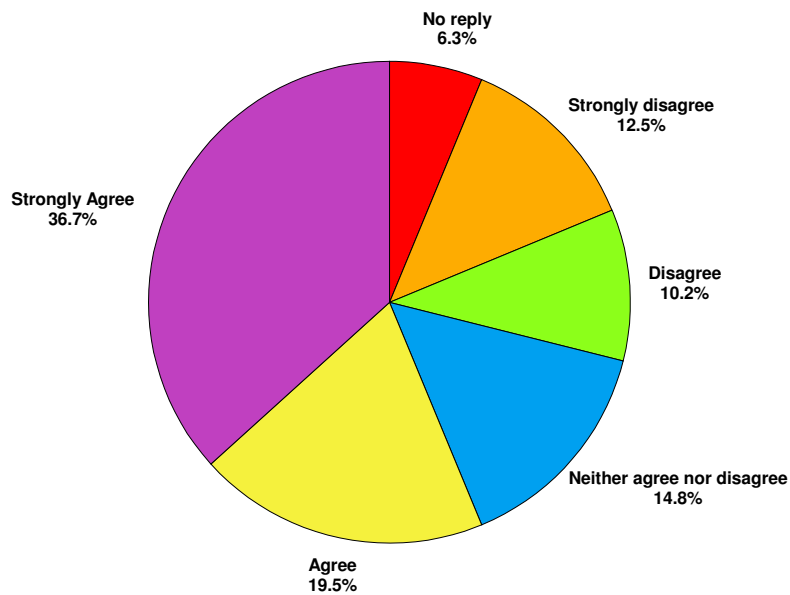
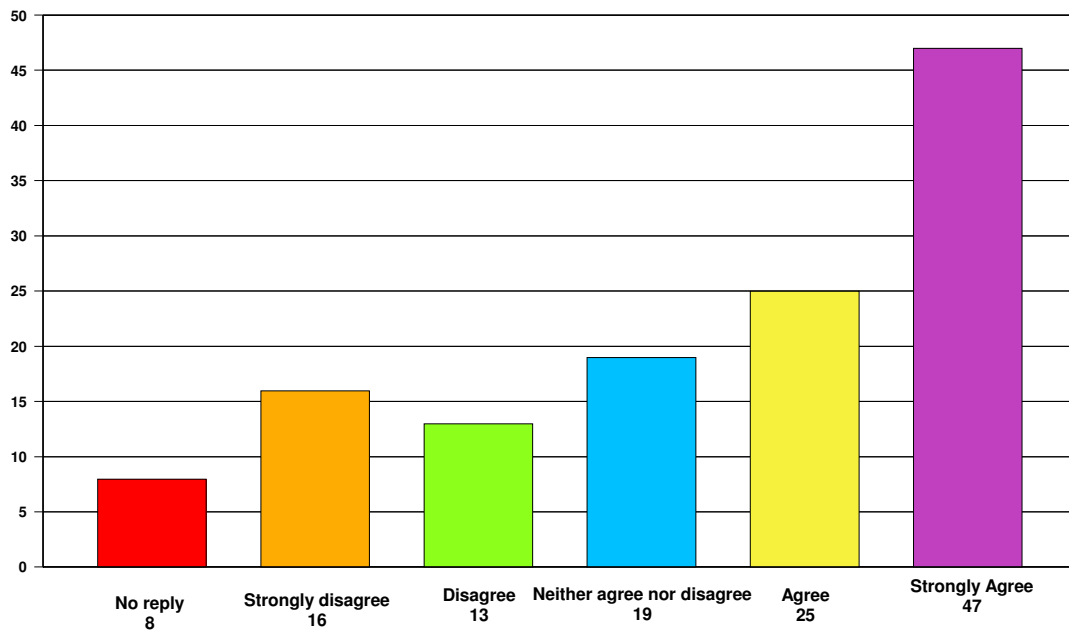
Demographic of respondents

The pie chart below shows the proportion of respondents in or near each of the areas listed as question 15 on the questionnaire as a 'congestion hot-spot'.



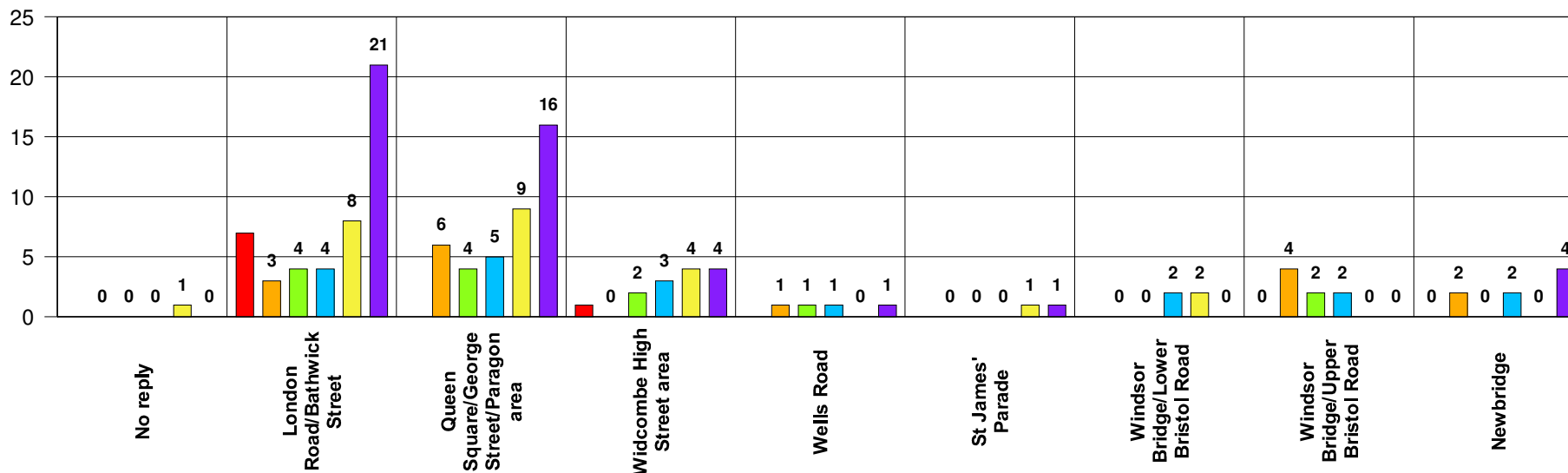
The above pie chart shows that the areas in the Air Quality Management Area with the greatest response to the questionnaire were the London Road/Bathwick Street area and the Queen Square / George Street / Paragon area with 36.7% and 31.3% respectively. The next greatest response was from Widcombe High Street (parade) area with 10.9%.

Q1 Bath Transport Package (P & R expansion, Rapid Transit & City Centre restrictions)



The above graphs show that 56.2% of respondents agree or strongly agree and 22.7% disagree or strongly disagree with the Bath Transport Package overall.

The following chart illustrates a break-down of respondent opinion based on where they live or work.



Area where respondents stated they lived or worked near.

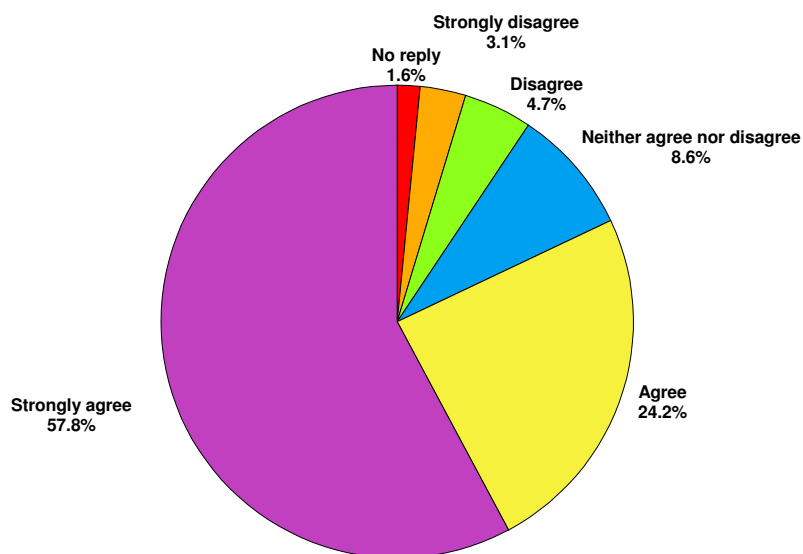
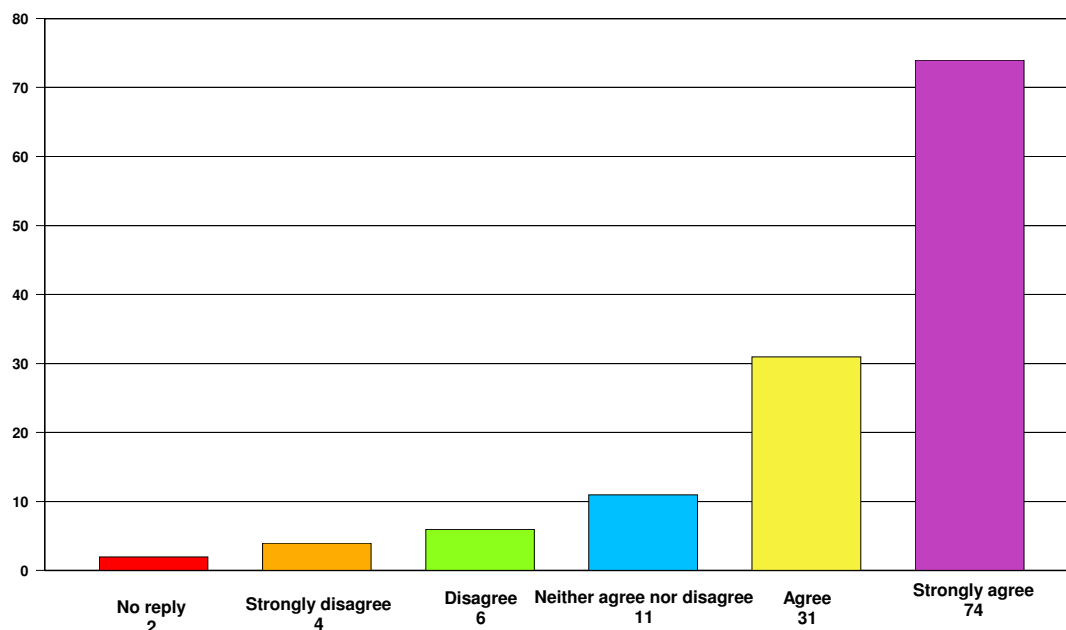
The bar chart above shows that the majority of people living or working nearest the London Road/Bathwick Street area are in favour of the Bath Transport Package generally, while in other areas the sample size in other areas .

Summary of responses to question 1

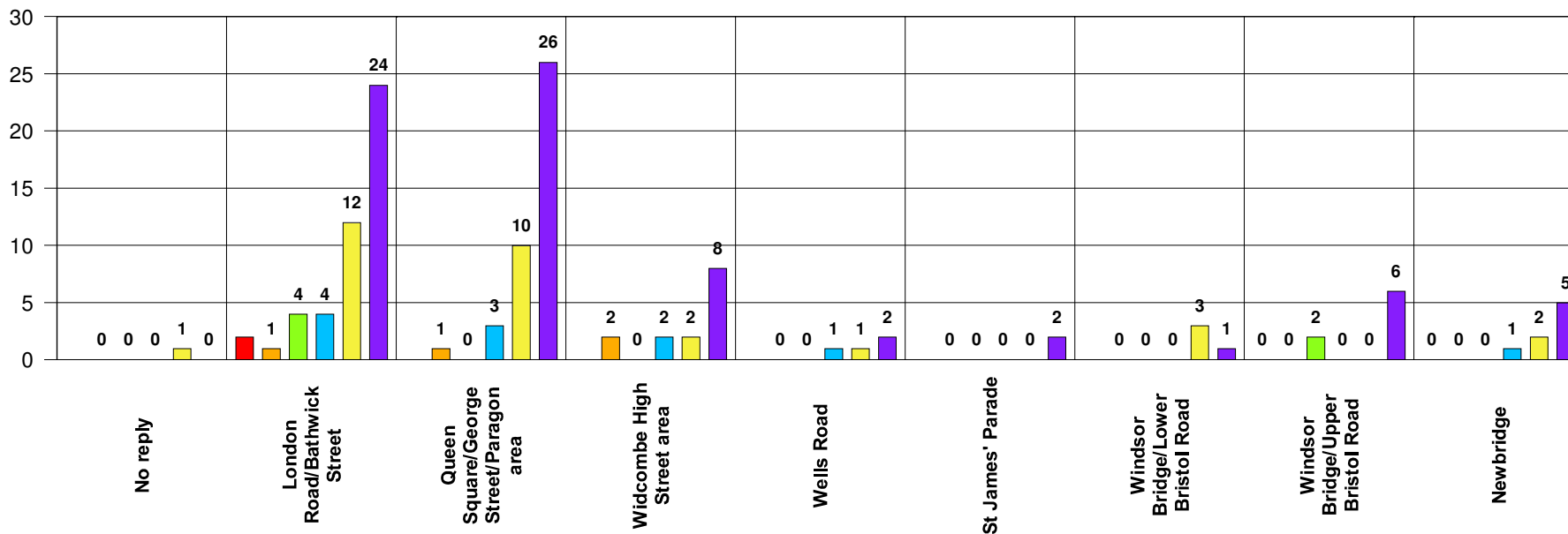
All of the comments made specifically relating to this action are quoted in section 4.

While a number of comments expressed support for the park and ride elements of the BTP, most expressed concern over the rapid transit element. Respondents highlighted the negligible modelled reduction in air quality and traffic volumes that would result from the measures and suggested that there was no evidence of a comprehensive strategy, while some respondents recognised the measures as an 'enabler' and 'vital first step' that should be complemented by other measures. There were routing suggestions including the use of Lower Bristol Road – negating the need for a river crossing. Concern was raised over the cost benefit analysis scoring system used to assess the BTP and that it rated higher than previous comments and modelling suggested. The cost benefit analysis method is being revised for the final action plan.

Q2 Trials of low emission buses on Park & Ride routes



The above graphs show that 82% of respondents agree or strongly agree and 7.8% disagree or strongly disagree with the trial of low emission buses on the park and ride services.



Area where respondents stated they lived or worked near.

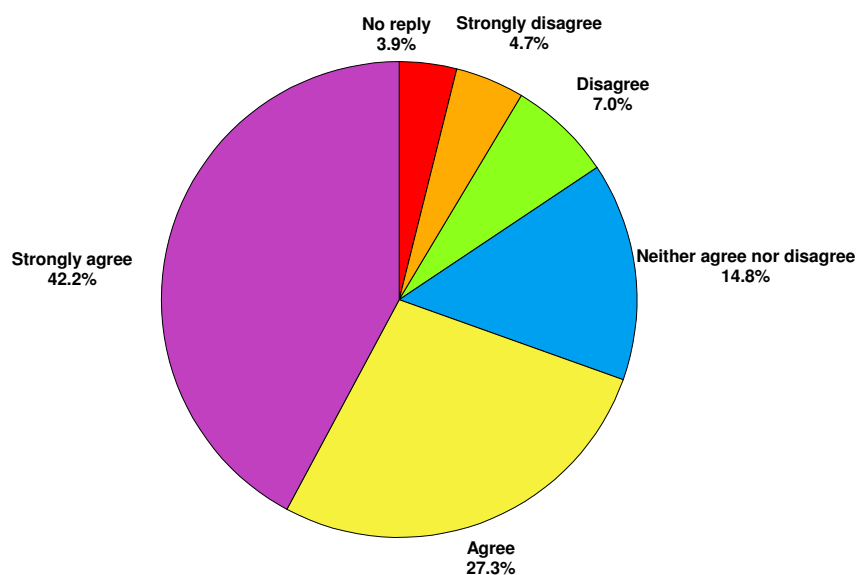
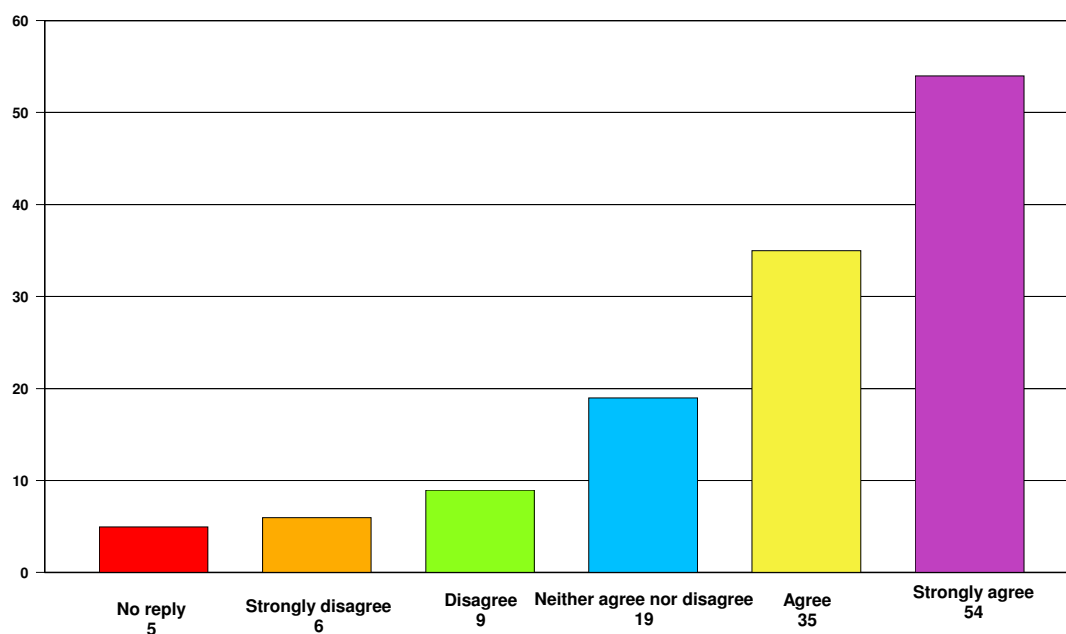
The bar chart above shows that the majority of respondents in the London Road/Bathwick Street and Queen Square/George St/Paragon area agree or strongly agree with trials of low emission buses on the park and ride services. The majority of respondents in other areas also agree with the action.

Summary of responses to question 2

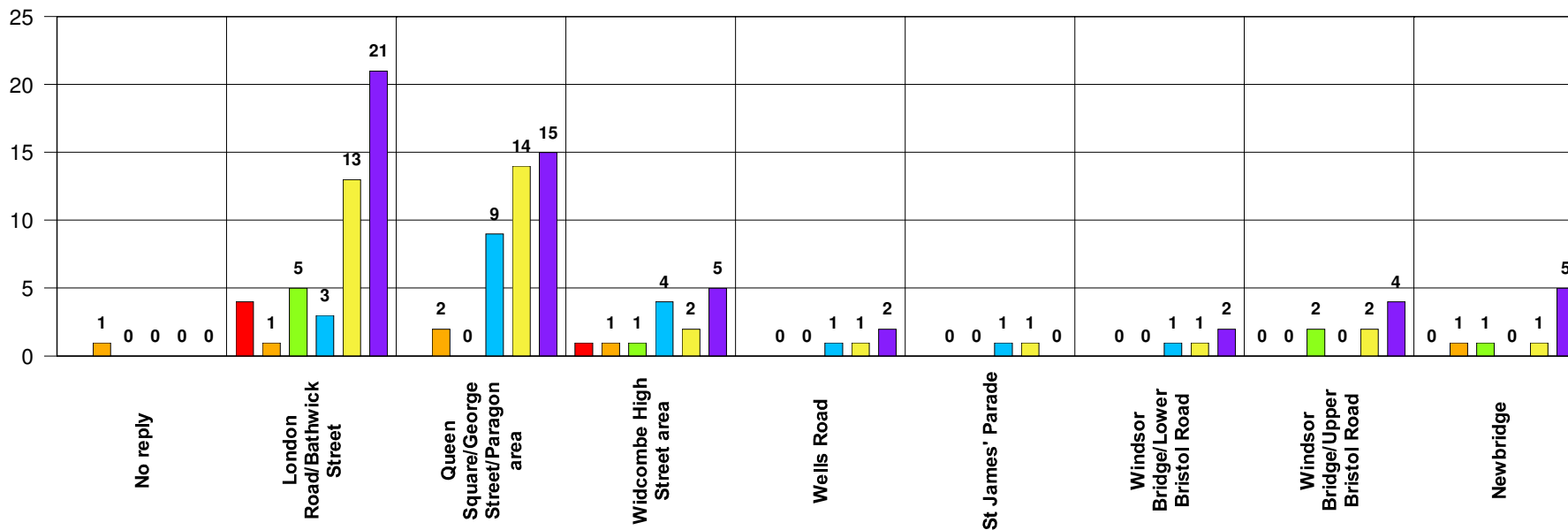
All of the comments made specifically relating to this action are quoted in section 4.

This was a popular action that inspired less comment due to no clear disbenefits coming from the use of low emission vehicles. Comments included suggesting that all new vehicles should be low emission and highlight that a combination of good service, comfort and affordability would also be effective in getting people out of their cars.

Q3 Review emission reduction and fuel additive technologies



The above graphs show that 69.5% of respondents agree or strongly agree and 11.7% disagree or strongly disagree with reviewing emission reduction and fuel additive technologies (and undertaking a feasibility study for introducing into vehicle fleets in Bath).



Area where respondents stated they lived or worked near.

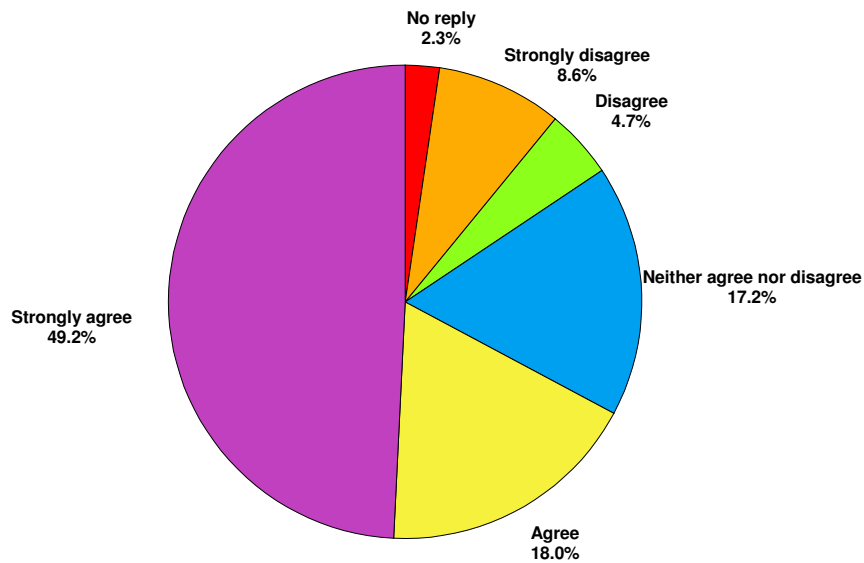
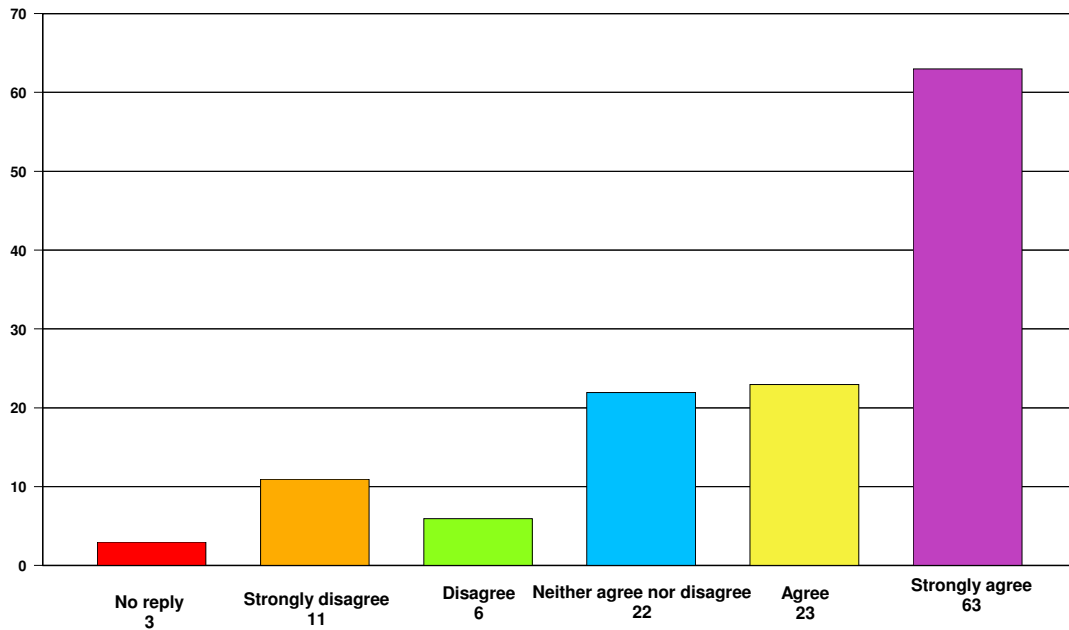
The bar chart above suggests that people living or working nearest the London Road/Bathwick Street and Queen Square/George St/Paragon area agree or strongly agree with reviewing emission reduction and fuel additive technologies (and undertaking a feasibility study for introducing into vehicle fleets in Bath). Also, 6 of the 8 respondents in the Newbridge area agree or strongly agree with this.

Summary of responses to question 3

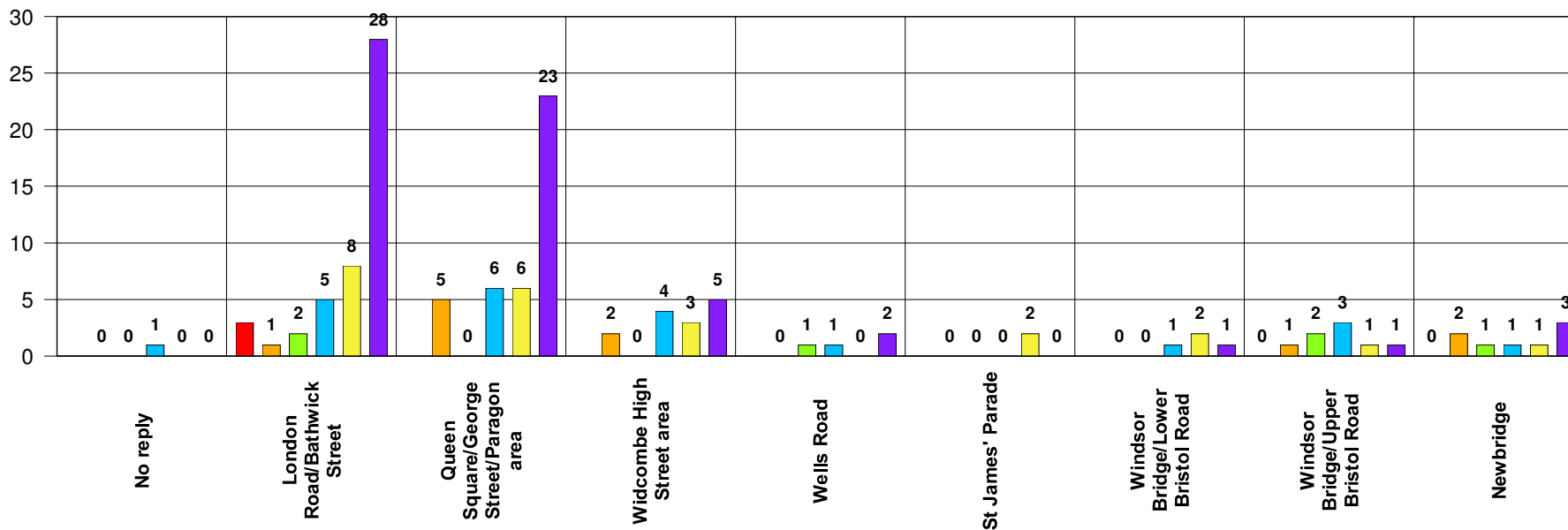
All of the comments made specifically relating to this action are quoted in section 4.

Whilst this action is broadly supported, the comments suggest that it is not clear how this differs from action 13 in the draft AQAP (relating to bus fleet emissions). Respondents also query the availability of resources for the feasibility studies listed. The question is also raised about what vehicles would be affected and how this could come into effect.

Q4 Feasibility study for a Low Emission Zone



The above graphs show that 67.2% of respondents agree or strongly agree and 13.3% disagree or strongly disagree with a feasibility study for a low emission zone.



Area where respondents stated they lived or worked near.

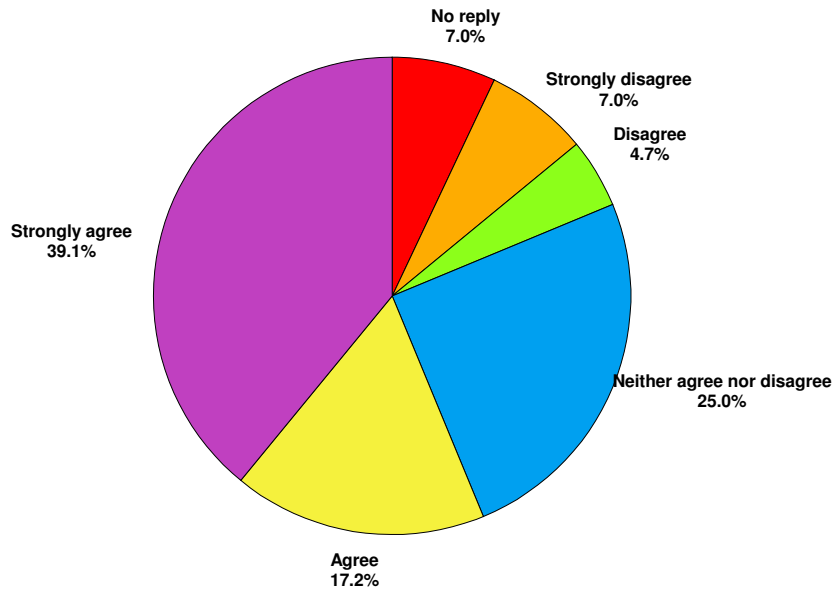
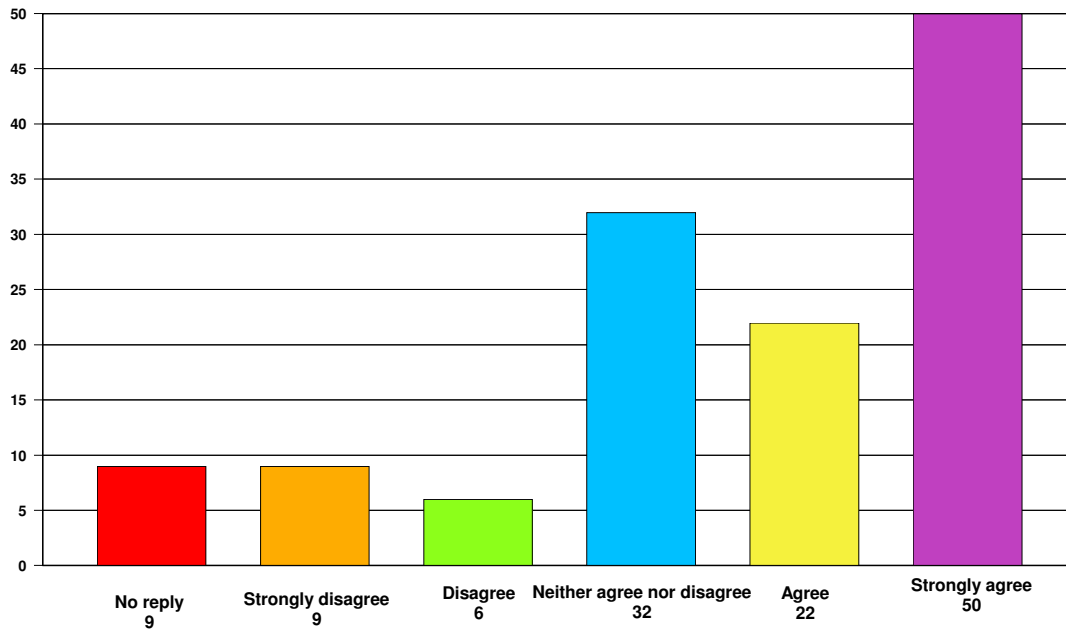
The above chart shows that respondents near the London Road/Bathwick Street and Queen Square/George Street/Paragon area overwhelmingly agree with undertaking a feasibility study for the introduction of a low emission zone. Elsewhere, with a small sample, the opinion is more evenly balanced.

Summary of responses to question 4

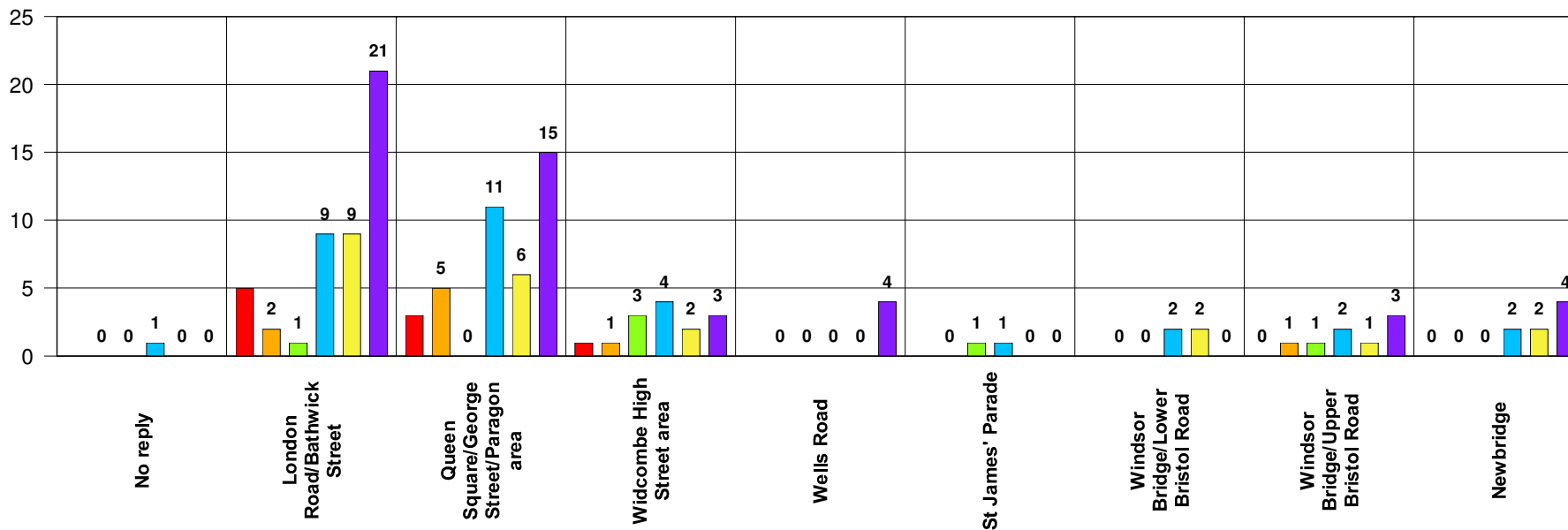
All of the comments made specifically relating to this action are quoted in section 4.

There is strong support for undertaking a feasibility study into a Low Emission Zone. The disproportionate contribution to nitrogen dioxide emissions that HDVs make is acknowledged. Suggestions include an engine 'switch-off zone'; making the engine emission required standard Euro V; further restrictions to coach access; and reviewing Council and emergency service vehicles.

Q5 A Freight Consolidation Centre demonstration



The above graphs show that 56.3% of respondents agree or strongly agree and 11.7% disagree or strongly disagree with a freight consolidation centre demonstration.



Area where respondents stated they lived or worked near.

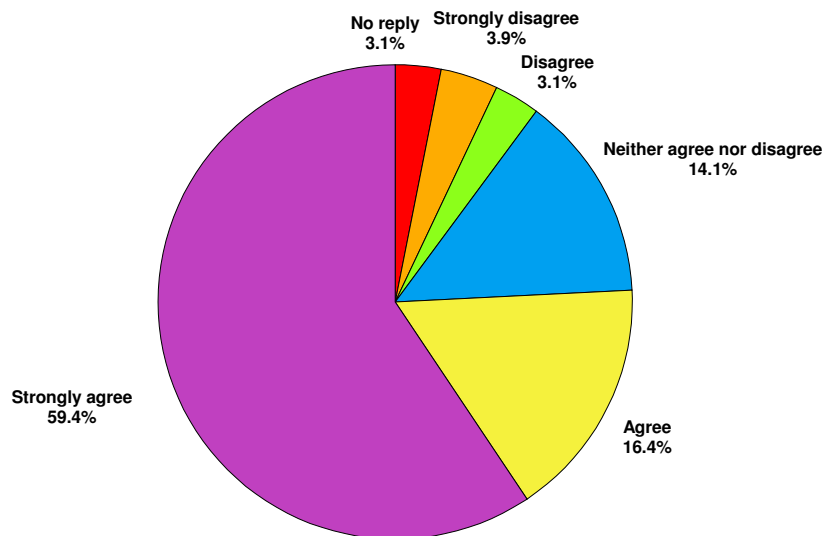
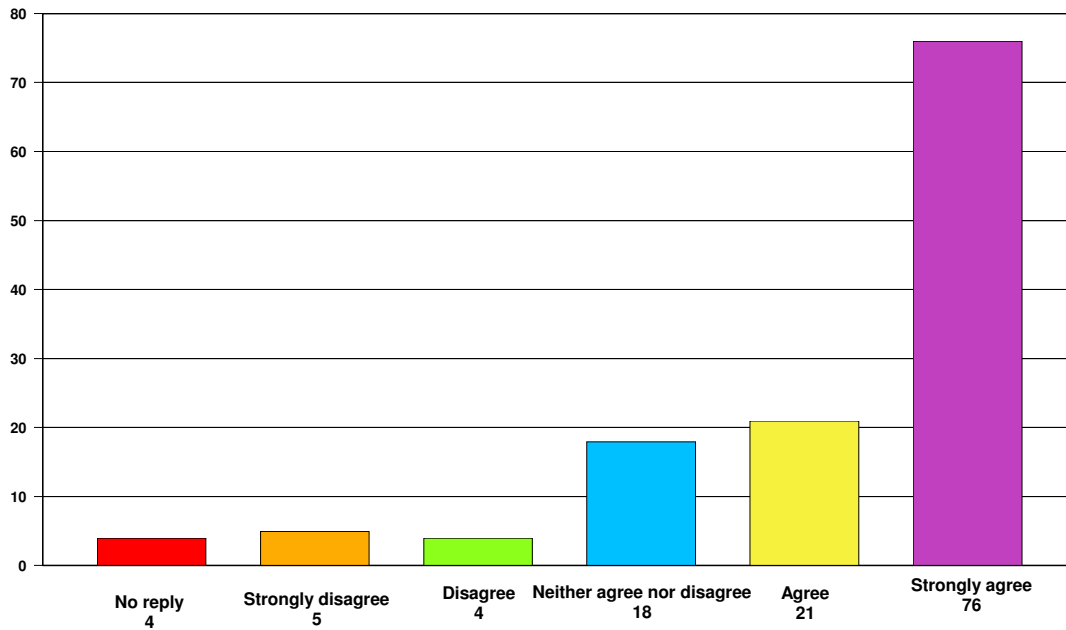
The above chart shows that the majority of respondents near the London Road/Bathwick Street and Queen Square/George Street/Paragon area agree with a freight consolidation centre demonstration.

Summary of responses to question 5

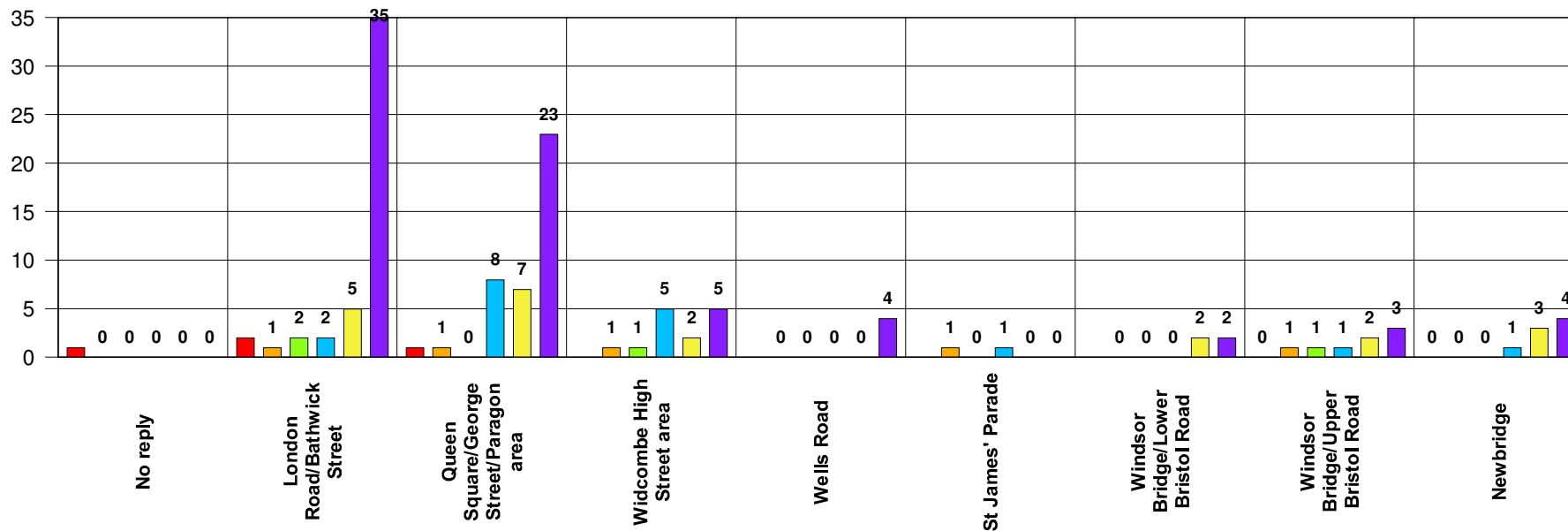
All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents support this measure. Comments include the questioning of why more trials need to be carried out when such a scheme is operational in other areas; concerns about cost-effectiveness for smaller businesses and the need for alternatives for them; it must be accompanied by effective measures to dissuade HGV through-traffic; and better enforcement of TROs.

Q6 Management of freight vehicles in the City Centre



The above graphs show that 75.8% of respondents agree or strongly agree and 7% disagree or strongly disagree with a management of freight vehicles in the city centre.



Area where respondents stated they lived or worked near.

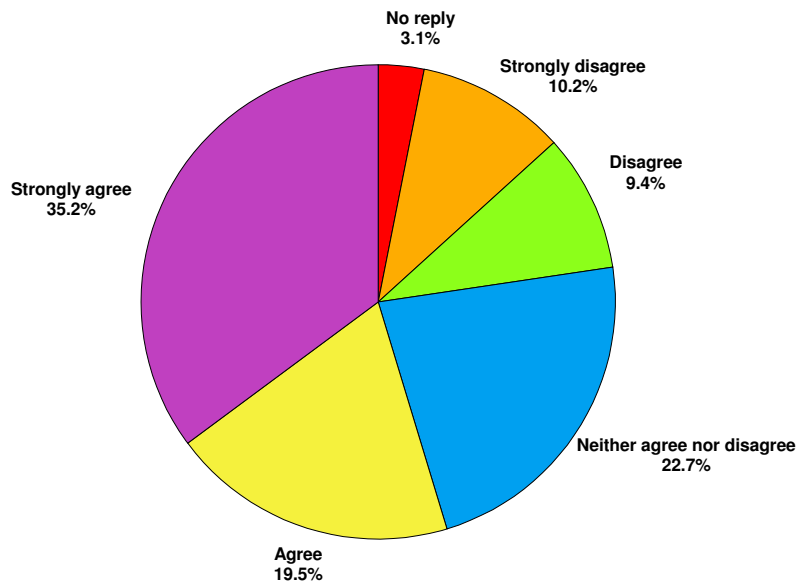
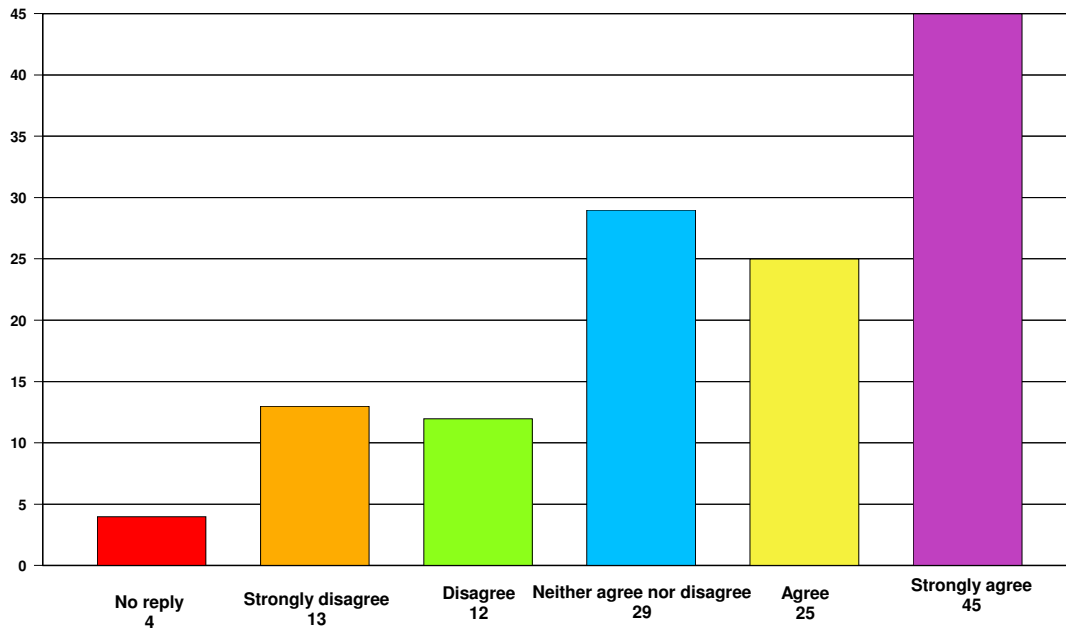
The above chart shows that an overwhelming majority of respondents near the London Road/Bathwick Street area strongly agree with the management of freight vehicles in the city centre. A smaller majority strongly agree in the Queen Square/George Street/Paragon area.

Summary of responses to question 6

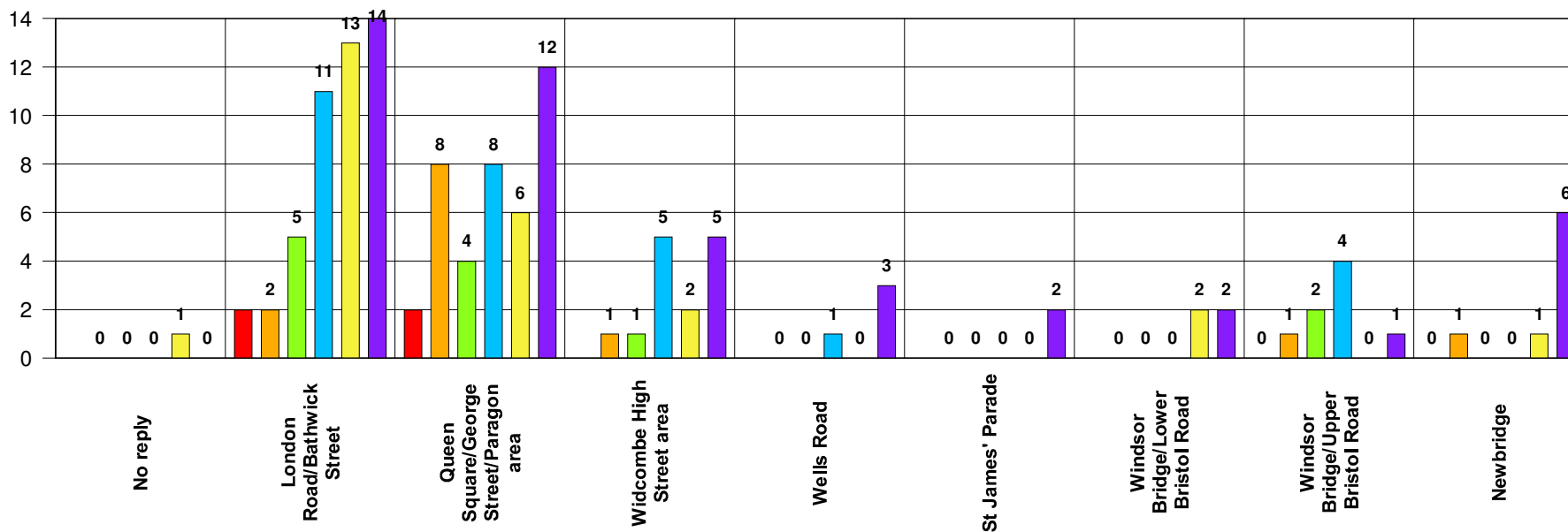
All of the comments made specifically relating to this action are quoted in section 4.

Suggestions included a total ban on HGVs in the centre; a ban on HGVs using London Road and Wells Road; building the A36/A46 link (FoBRA); (London Road Area Residents Association are against the building of a link); reduce HGV through traffic on Queen's Square; better enforcement of existing Traffic Regulation Orders; and congestion charging in the city centre.

Q7 Trials of an innovative cycle hire system in the city



The above graphs show that 54.7% of respondents agree or strongly agree and 19.6% disagree or strongly disagree with trials of an innovative cycle hire scheme.



Area where respondents stated they lived or worked near.

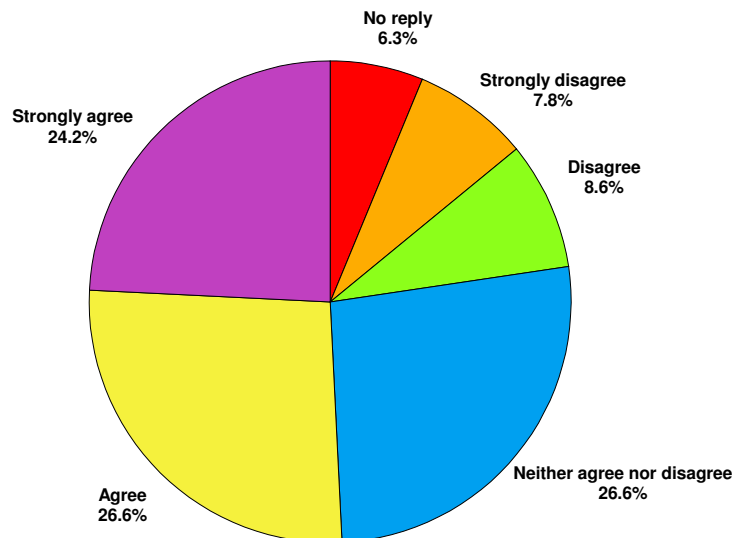
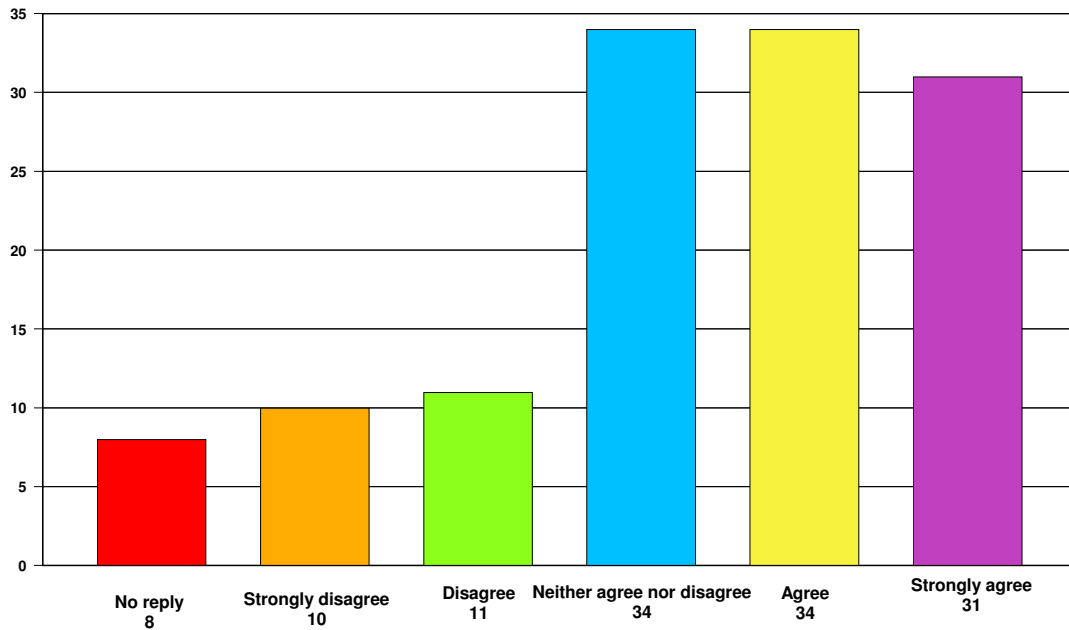
The above chart shows that a small majority of people in the London Road/Bathwick Street area either agree or strongly agree with trials of an innovative cycle hire scheme, with a significant number also neither agreeing nor disagreeing. In the Queen Square/George Street/Paragon area there is a more evenly distribution of opinion. Newbridge is one area where there is a clear strong agreement with the scheme.

Summary of responses to question 7

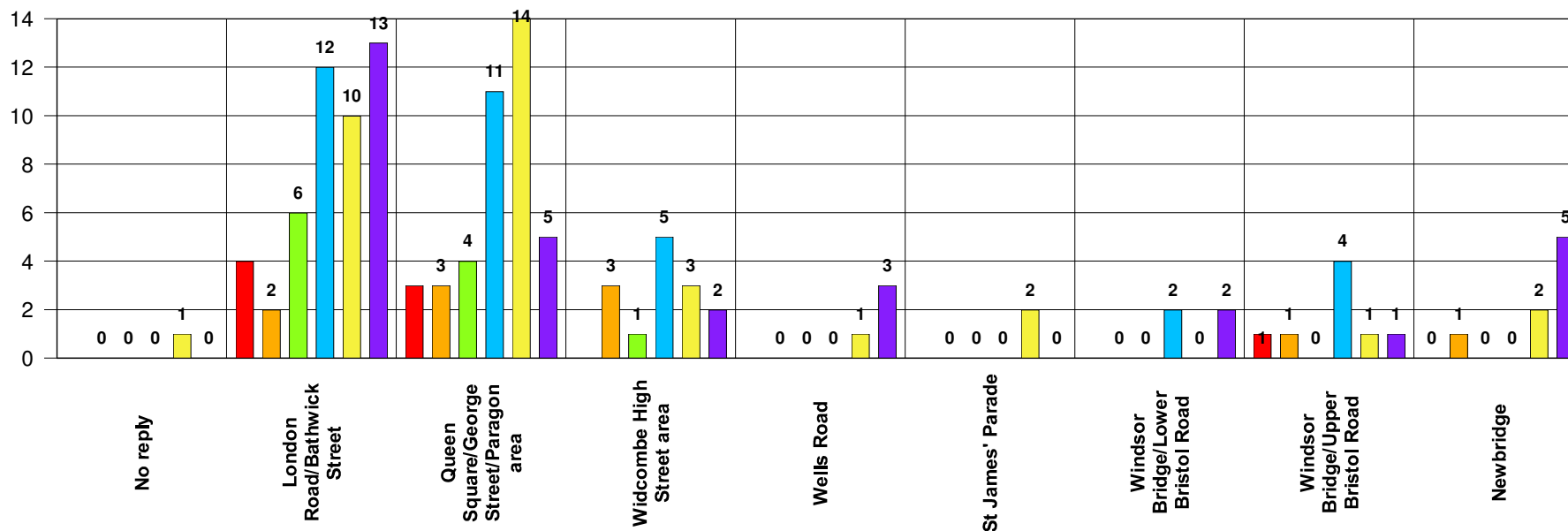
All of the comments made specifically relating to this action are quoted in section 4.

Opinion is in favour of this measure by a small margin, relative to other measures. Comments relating to question 7 include: putting a cycle-hire scheme on the 'back-burner' until significant quantifiable steps are undertaken; cycling is unsafe in the city centre; the Southgate development has removed some of the central cycling routes and not made any provision for cyclists; it is better to own a cycle than hire it; too hilly; more and better cycle lanes (London Road one is inadequate); ban cars from city centre; air quality will not be improved as a result; and place the racks sensitively.

Q8 Expanding the City Car Club



The above graphs show that 50.8% of respondents agree or strongly agree and 16.4% disagree or strongly disagree with expansion of the City Car Club.



Area where respondents stated they lived or worked near.

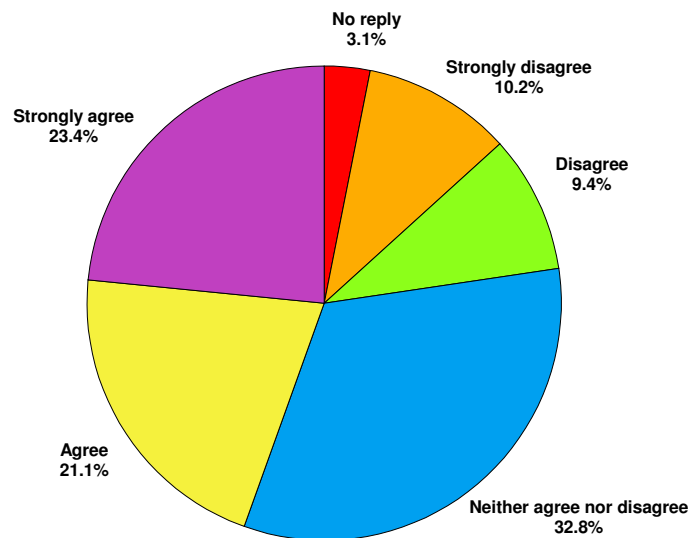
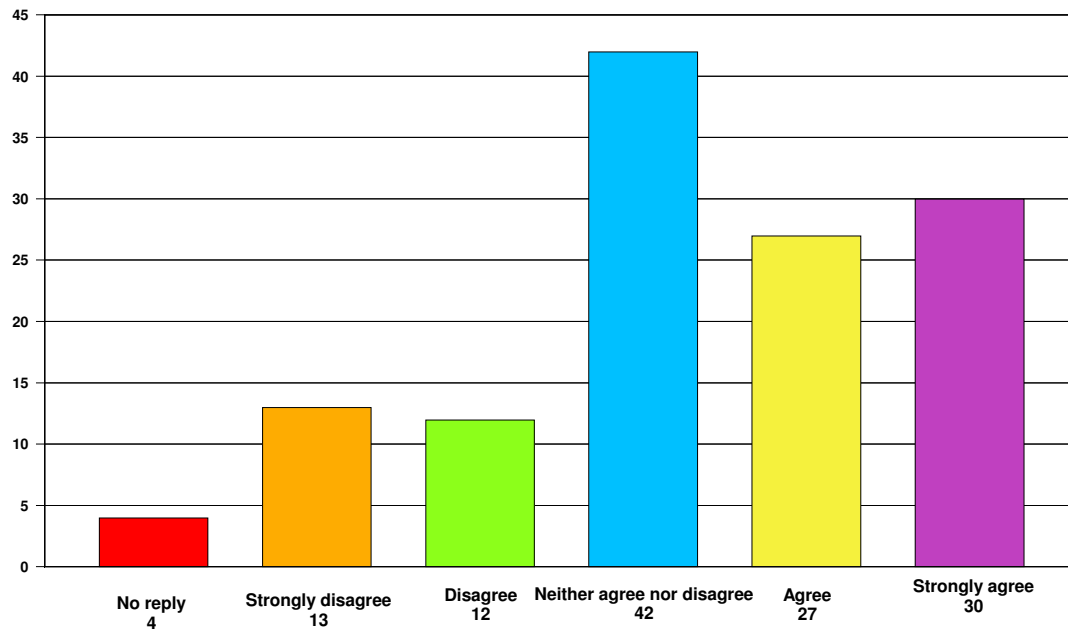
The above chart shows that a small majority of people in the London Road/Bathwick Street area either agree or strongly agree with the expansion of the City Car Club, with a significant number also neither agreeing nor disagreeing. In the Queen Square/George Street/Paragon area there is a more evenly distribution of opinion. Opinion of respondents in the Widcombe High Street area is balanced. Newbridge is one area where there is a clear strong agreement with the scheme.

Summary of responses to question 8

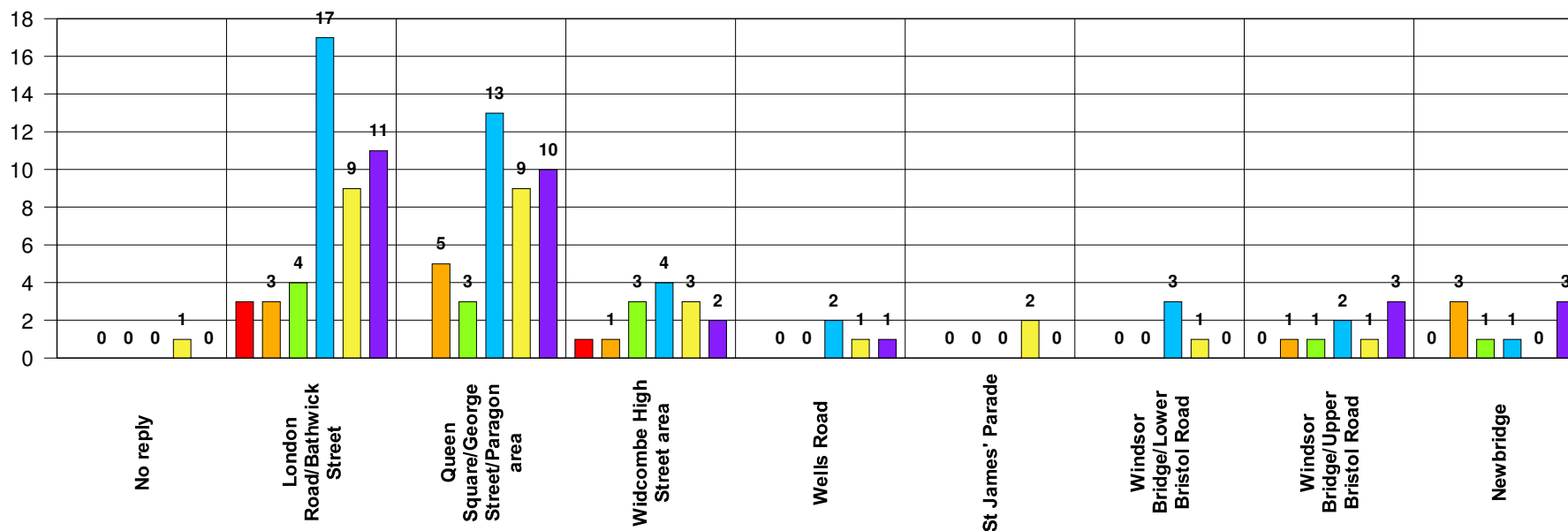
All of the comments made specifically relating to this action are quoted in section 4.

Opinion is in favour of this measure by a small margin, relative to other measures. Comments relating to question 8 include: new residential developments within the city should be required to provide Car Club spaces; any expansion should be accompanied by other measures; expansion with environmentally friendly vehicles; and air quality improvements will be very small.

Q9 Improve building emission assessments and incorporate into planning requirements



The above graphs show that 44.5% of respondents agree or strongly agree and 19.6% disagree or strongly disagree with improving building emission assessments.



Area where respondents stated they lived or worked near.

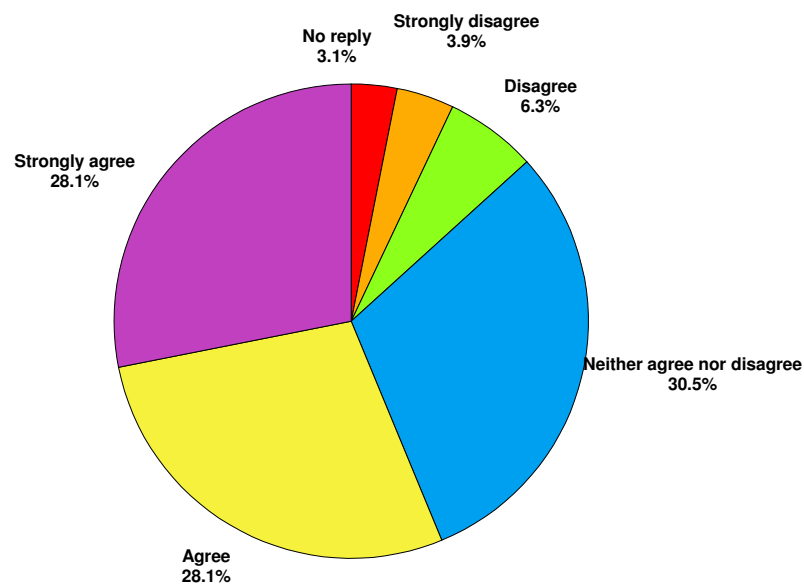
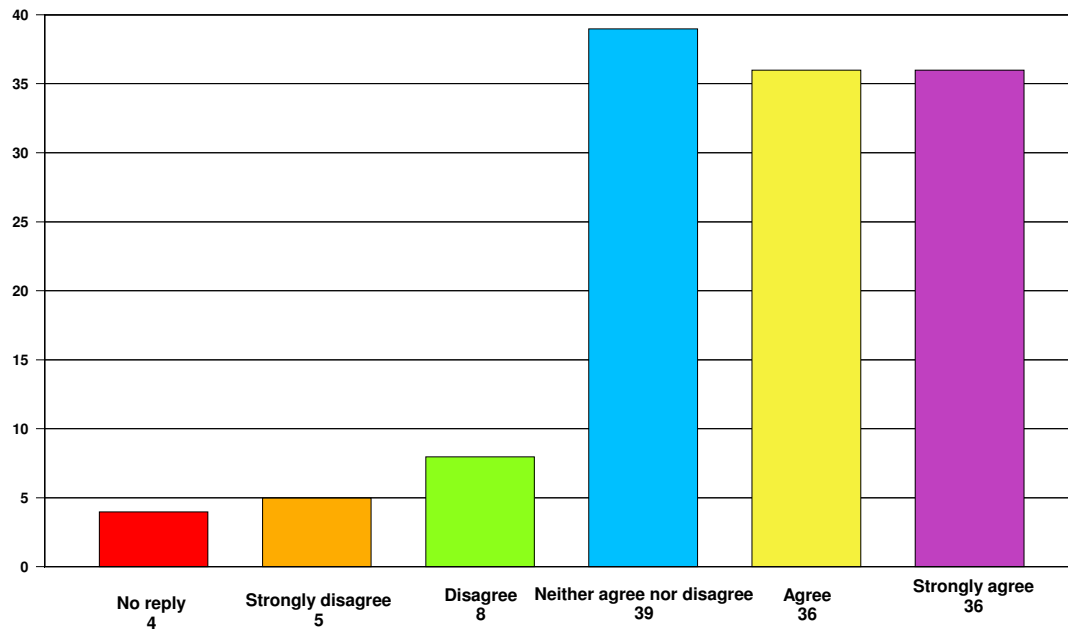
The above chart shows that almost as many respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas neither agree nor disagree as those that agree or strongly agree with improving building emission assessments. Opinion of respondents in the Widcombe High Street area is balanced. Newbridge is one area where there is a clear strong agreement with the scheme.

Summary of responses to question 9

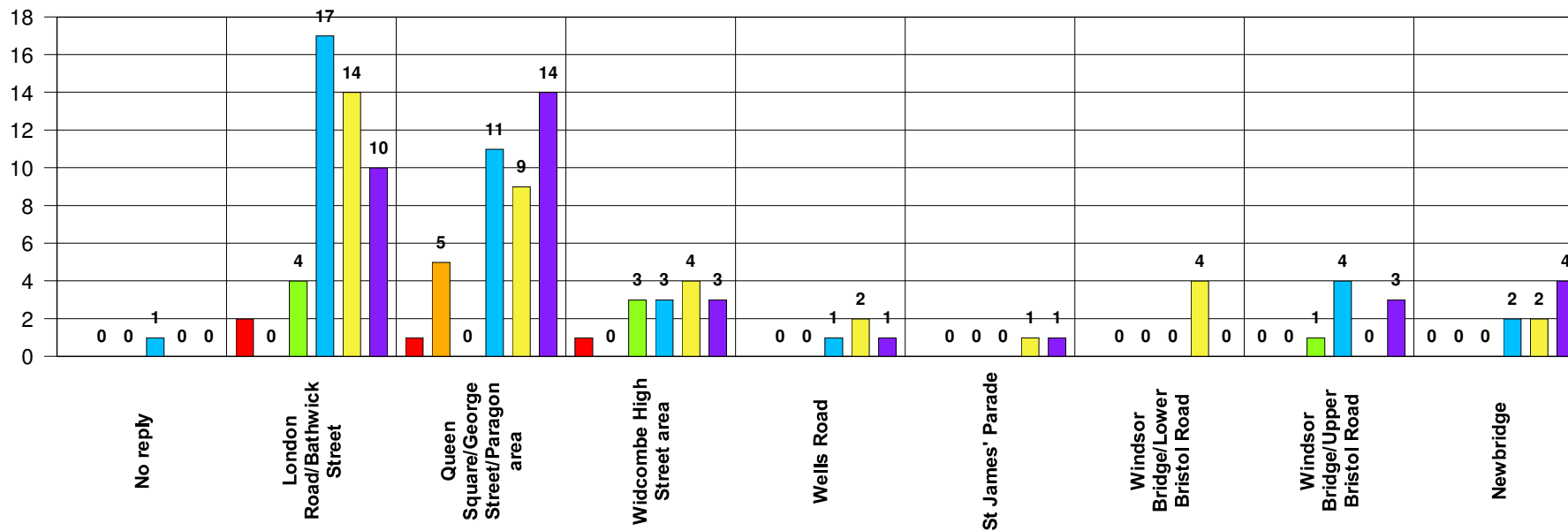
All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents neither agreed nor disagreed with this action. Comments relating to question 9 include: that the measure will require internal expertise and resources (planning enforcement team); insulation and double glazing should be encouraged in older properties.

Q10 Investigate options for installation of electric vehicle charging points



The above graphs show that 56.2% of respondents agree or strongly agree and 10.2% disagree or strongly disagree with improving building emission assessments.



Area where respondents stated they lived or worked near.

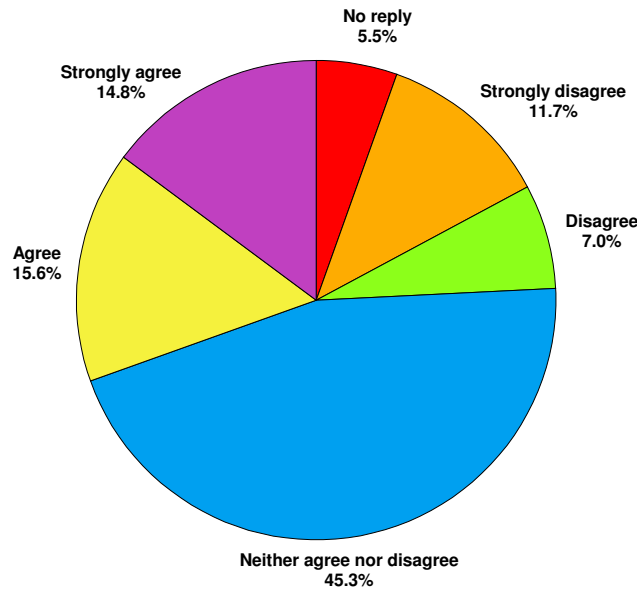
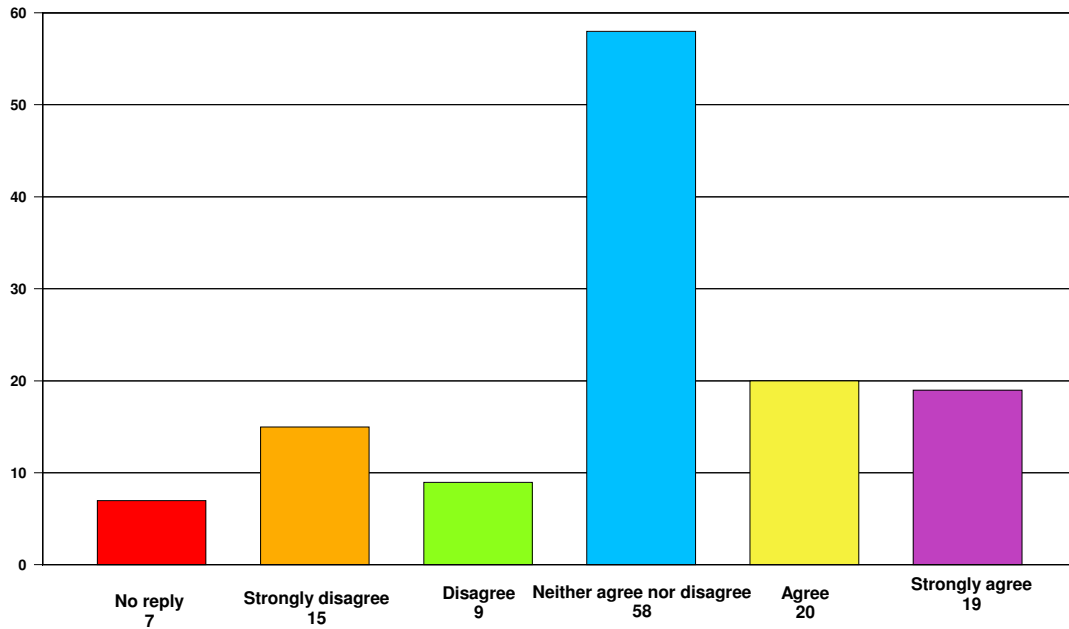
The above chart shows that whilst the majority of respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas agree or strongly agree with the installation of electric vehicle charging points, a significant number of respondents neither agree nor disagree. Elsewhere, the majority of respondents agree with the scheme.

Summary of responses to question 10

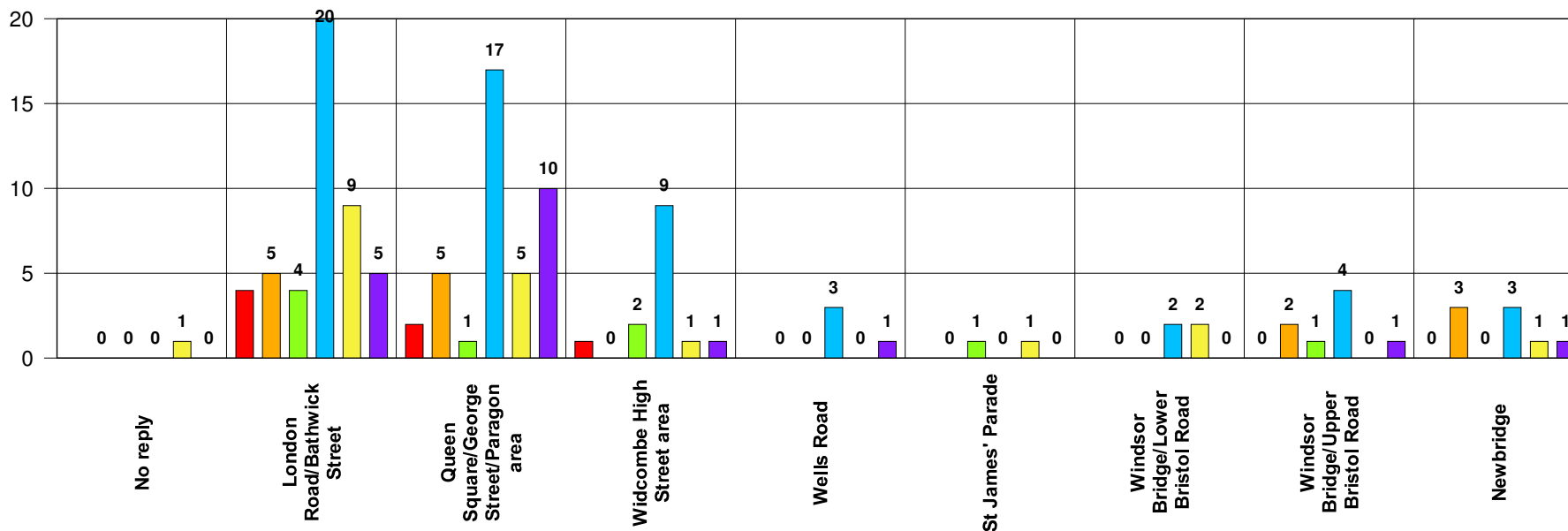
All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents agree or strongly agree with this action. Comments relating to question 10 include: charging points in existing car parks is preferred to roadside 'clutter'; error in report – wrongly saying that carbon dioxide emissions are not necessarily reduced – power stations are likely to get cleaner; B&NES should invest in their own electric vehicles; additional car club cars should be electric; the first new Council purchases have not followed recommendation of converting to low-emission electric vehicles; would deliver a strong message to public; the first charging points should be installed close to main taxi ranks and should offer incentives to taxi owners; only permit electric or low emission vehicles to use the bus lanes and certain streets like Milsom Street and the bus gate.

Q11 Feasibility study for use of titanium dioxide paint to reduce nitrogen dioxide



The above graphs show that 30.4% of respondents agree or strongly agree and 17.2% disagree or strongly disagree with improving building emission assessments.



Area where respondents stated they lived or worked near.

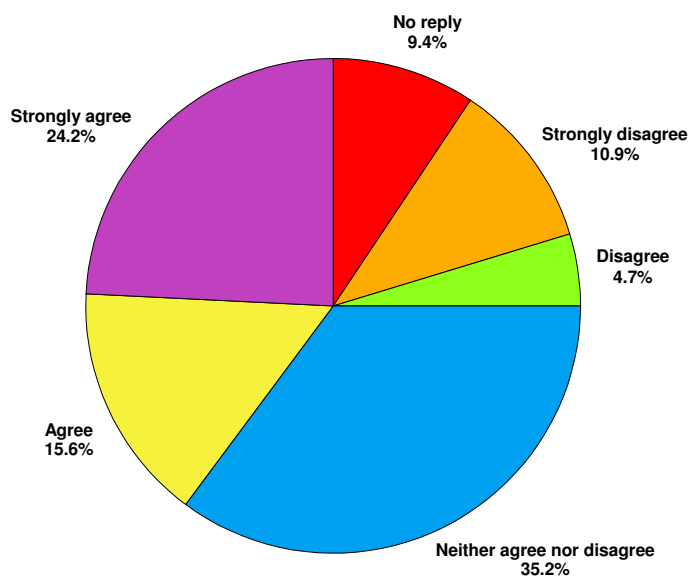
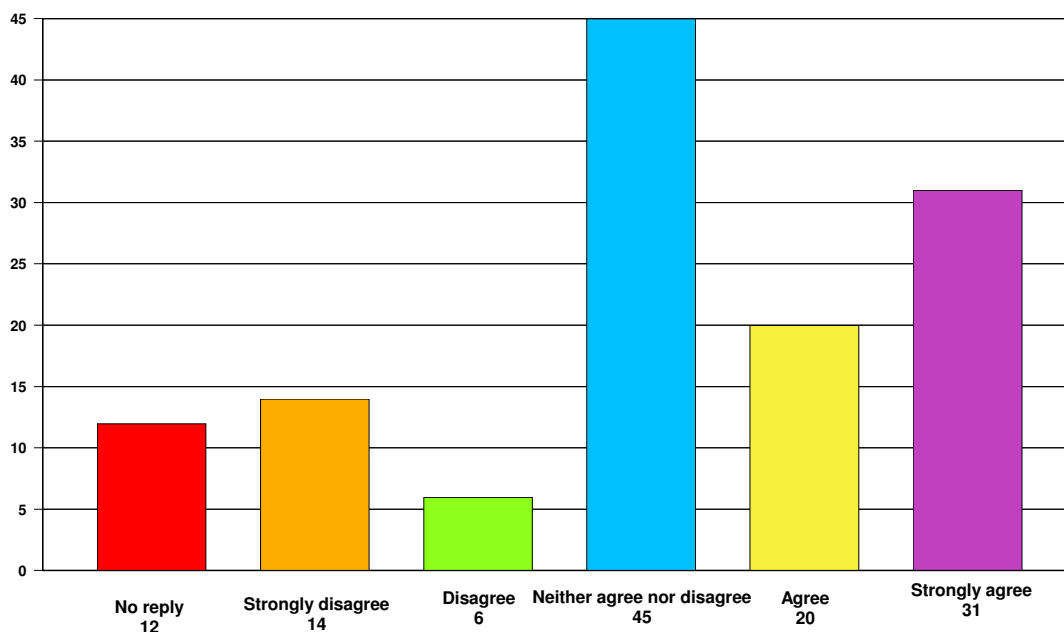
The above chart shows that the majority of respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas neither agree nor disagree with a feasibility study for use of titanium dioxide paint to reduce nitrogen dioxide. Almost as many respondents disagree or strongly disagree, as they do agree or strongly agree.

Summary of responses to question 11

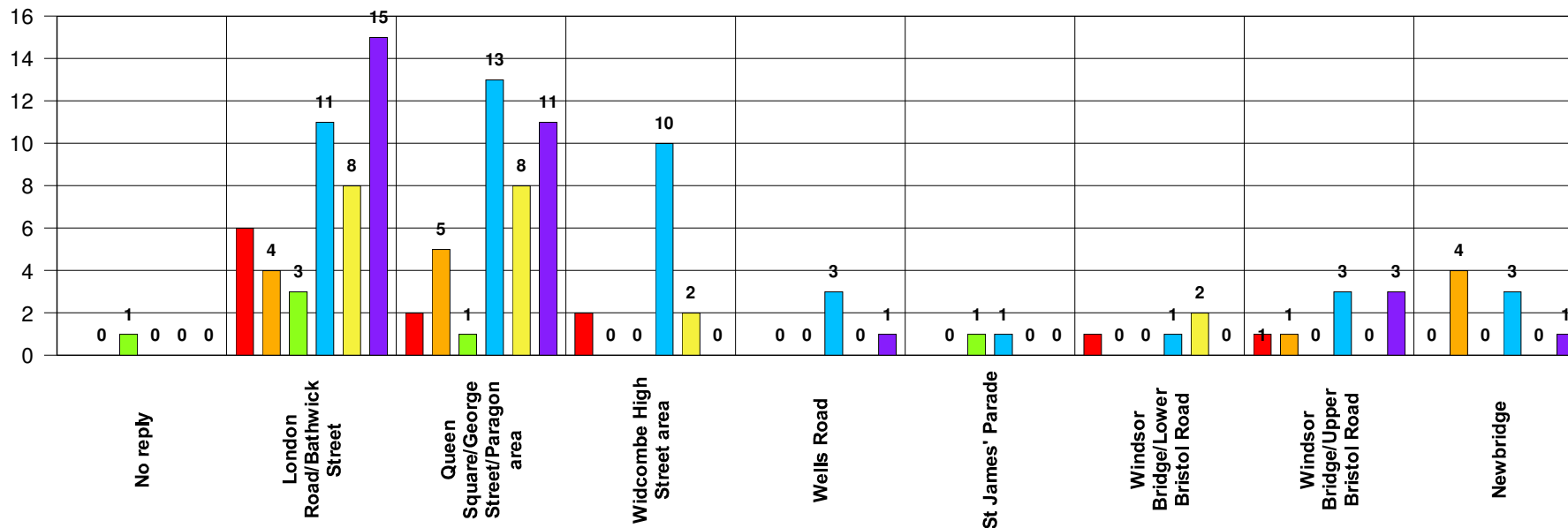
All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents neither agree nor disagree with this action. The only comment relating to question 11 is that this is a wider issue and feasibility study should be centrally funded.

Q12 Introduction of an ECOStars Vehicle Recognition Scheme



The above graphs show that 39.8% of respondents agree or strongly agree and 15.6% disagree or strongly disagree with the introduction of an ECOStars vehicle recognition scheme.



Area where respondents stated they lived or worked near.

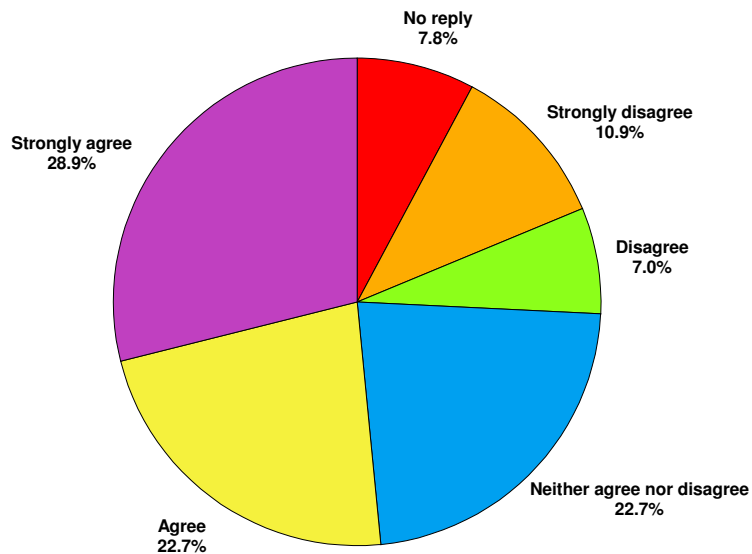
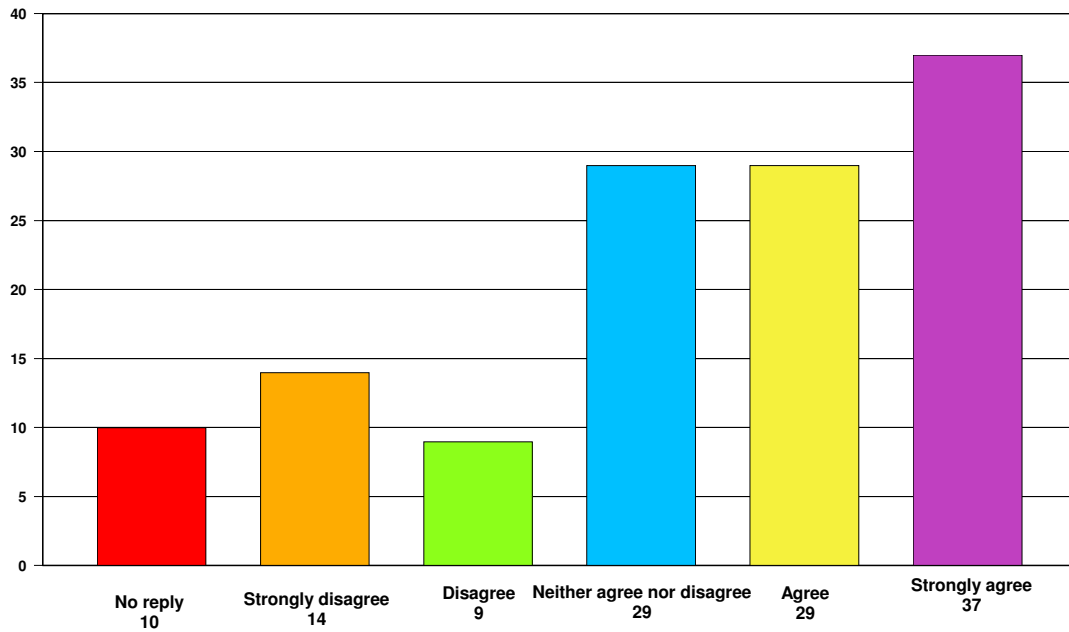
The above chart shows that the majority of respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas agree or strongly agree with the introduction of an ECOSTars vehicle recognition scheme. The second largest opinion group in the survey neither agree nor disagree. Elsewhere, the opinion is broadly balanced.

Summary of responses to question 12

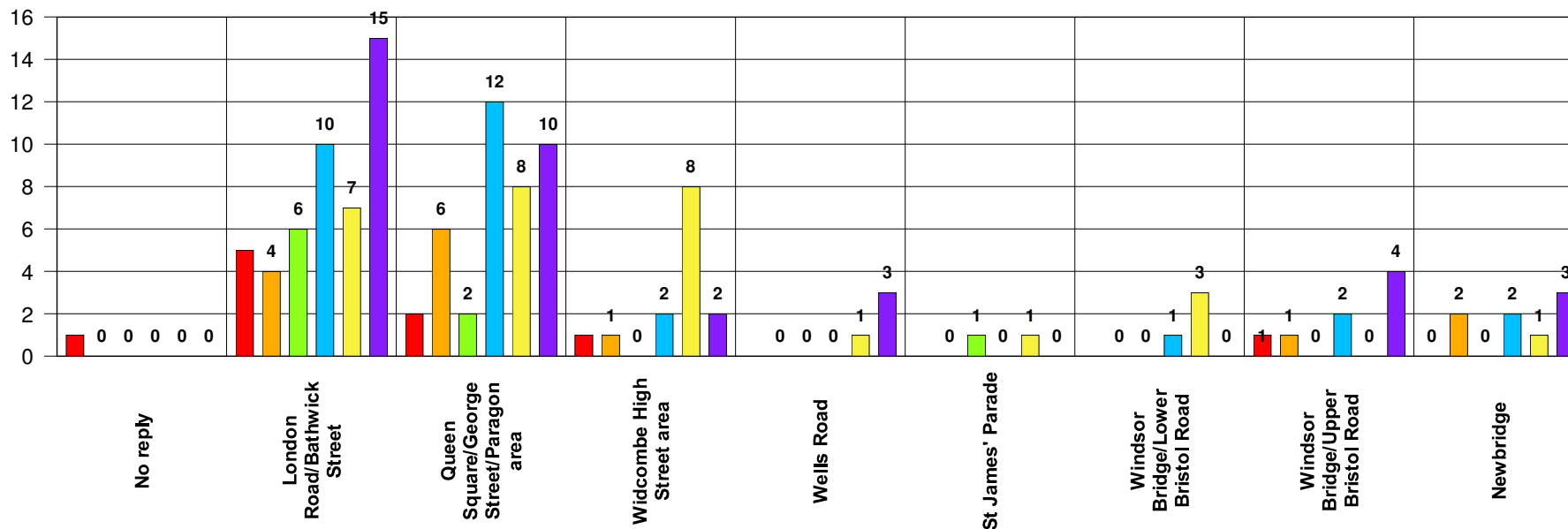
All of the comments made specifically relating to this action are quoted in section 4.

A small majority of respondents agree or strongly agree with this action. A comparable number also neither agree nor disagree with this action. Comments relating to question 12 include: doubts over the cost-benefits of the scheme; doubts over how it would be monitored; and that there will be no quick improvements to air quality.

Q13 Studies on wayfinding and information systems



The above graphs show that 51.6% of respondents agree or strongly agree and 17.9% disagree or strongly disagree with improving building emission assessments.



Area where respondents stated they lived or worked near.

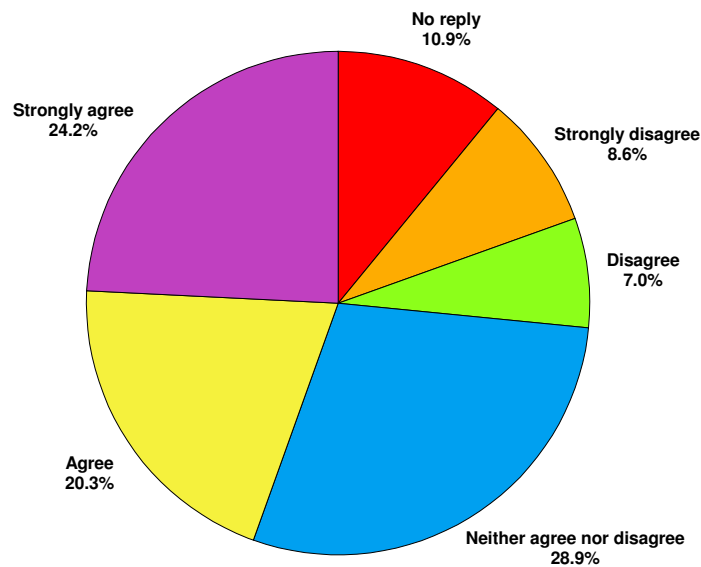
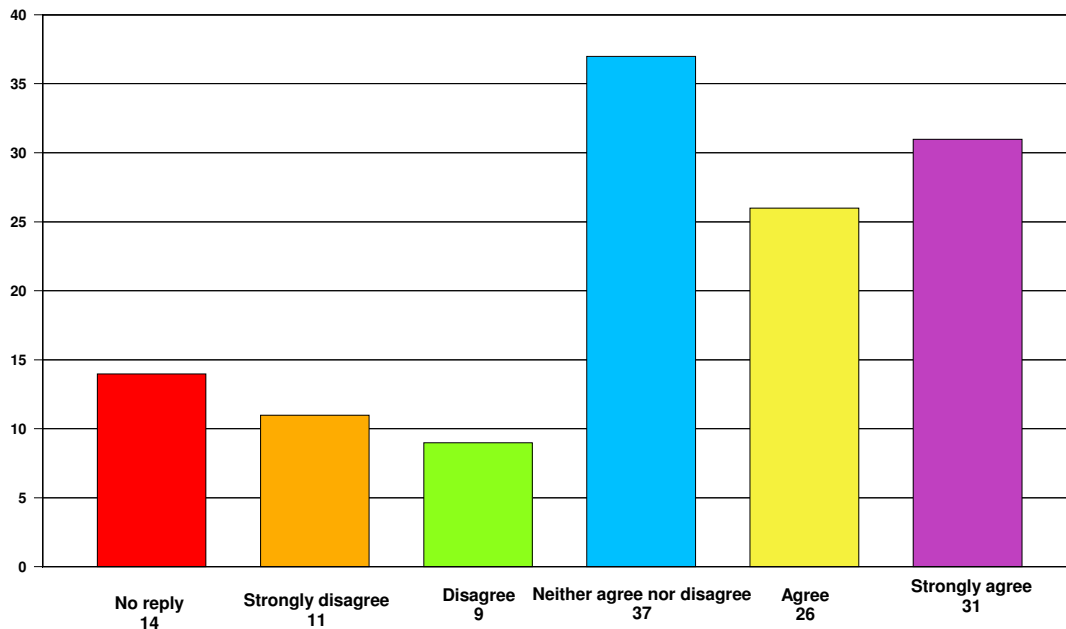
The above chart shows that the majority of respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas agree or strongly agree with undertaking studies on a wayfinding and information system. The second largest opinion group in the survey neither agree nor disagree. Elsewhere, the opinion is mostly agreement and strong agreement.

Summary of responses to question 13

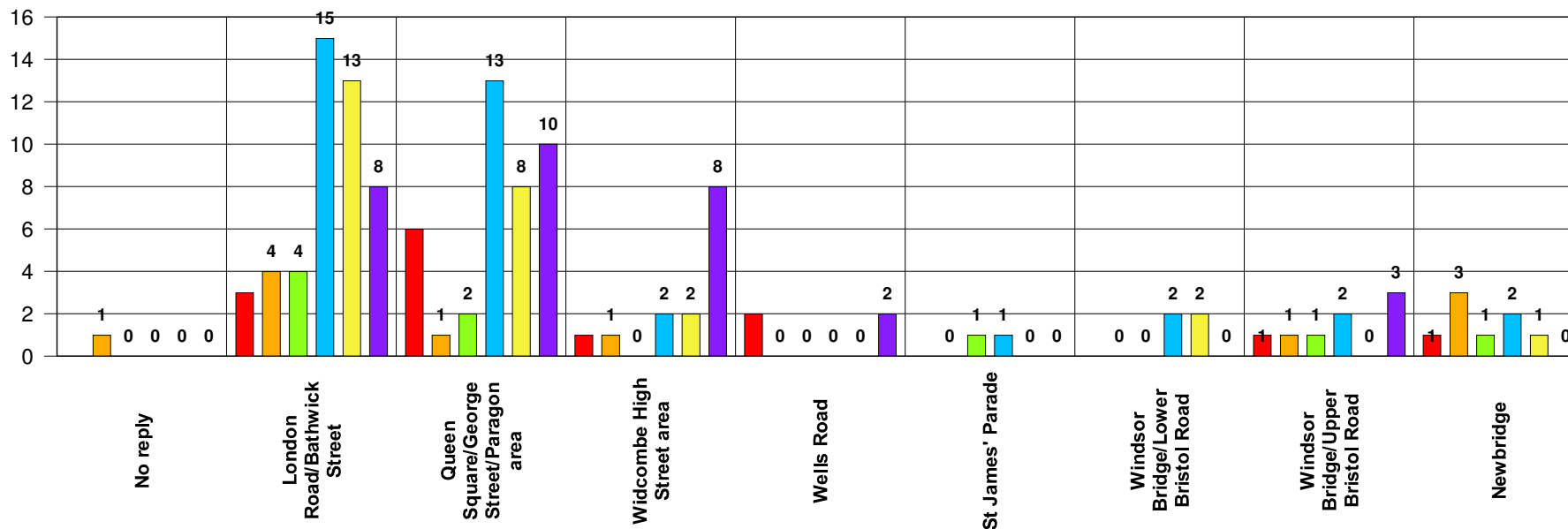
All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents agree or strongly agree with this action. Comments relating to question 13 include: would lead to a much better interpretation of the city; views of the landscape must be protected from infrastructure; designs must be firmly rooted in local traditional style and not the latest fad; it will not affect or improve air quality; and on board public transport information and real time is long overdue.

Q14 Investigation into options for Rossiter Road and Widcombe High Street road layout alterations



The above graphs show that 44.5% of respondents agree or strongly agree and 15.6% disagree or strongly disagree with investigation into options for Rossiter Road and Widcombe High Street road layout alterations.



Area where respondents stated they lived or worked near.

The above chart shows that the majority of respondents in the London Road/Bathwick Street and Queen Square/George Street/Paragon areas agree or strongly agree with investigation into options for Rossiter Road and Widcombe High Street road layout alterations. The second largest opinion group in the survey neither agree nor disagree. The majority of the 14 respondents from the Widcombe High Street area agree with the investigation. Elsewhere, the opinion is mixed.

Summary of responses to question 14

All of the comments made specifically relating to this action are quoted in section 4.

The majority of respondents agree or strongly agree with this action (44.5%). Comments relating to question 14 include: this has been on the drawing board for a long time; any scheme must not worsen pollution elsewhere (Widcombe School); St James's Parade congestion problems; will improve air quality and slow down traffic on Rossiter Road; should be tackled with the current plan and not left to a future modelling exercise; must consider the wider area; proposed city centre measures will lead to more traffic being pushed around the perimeter; 18% increase in traffic due to Southgate means that projections for nitrogen dioxide objectives being met by 2014 based on no growth are nullified. Comments made about the detail of the text report have been addressed and corrected – the actual results of the modelling were unknown at the time of writing.

4. Respondent comments and officer response table:

Questionnaire item number	SUGGESTIONS RECEIVED	RESPONSE
1. Bath Transport Package	<p><i>"Suggested route for Park and Ride bus from Newbridge: Newbridge across river from Brassmill Lane to Lower Bristol Road through trading estate; then cut through by Roseberry Road to get to Western Riverside. Alternatively, site park and ride car park in triangle of land between Newbridge Road, Lower Bristol Road and river, obviating need for bridge over river. Re Q1: No 'Rapid Transit' through Newbridge - use Lower Bristol Road instead."</i></p>	<p>Alternative routes to improve bus priority between Newbridge P&R and the City Centre have been assessed. This assessment has demonstrated that the use of existing roads would not deliver the same benefits.</p> <p>Expansion of the existing Park & Ride at Newbridge is considered to a better option than developing a Green Belt site. Ground investigations, ecological studies and topographic surveys were produced for the scheme.</p>
	<p><i>"I am against the hugely expensive and pointless Newbridge BRT scheme. During peak periods traffic congestion on Windsor Bridge has a knock-on effect on Newbridge Road / Newbridge Hill and on Upper and Lower Bristol Roads. The BRT, coming out onto Windsor Bridge (& in due course crossing it) will only exacerbate this."</i></p>	<p>The segregated route provides the opportunity for BRT services to bypass congestion on existing routes. Congestion is forecast to worsen as demand increases, but journey times on the segregated section will remain consistent into the future.</p> <p>Scheme element should not be seen in isolation. The BTP is a holistic package of measures which include: Creating a Bus Rapid Transit route, including a 1.4km section of "off-street" dedicated bus route; Creating a more pedestrian and cyclist-friendly City Centre; Improving nine bus routes to Showcase standard; Introducing active traffic management with real-time information.</p> <p>Junction assessments, including Windsor Bridge, were included in the Transport Assessment published in the planning application. This states that the BRT proposals "will have no adverse effects on the operation of the</p>

		junctions under consideration”.
	<i>“The Newbridge Road part of the BRT does not seem to provide value for money. A large cost to save 5 mins per journey does not seem cost effective.”</i>	The segregated route provides the opportunity for BRT services to bypass congestion on existing routes. Congestion is forecast to worsen as demand increases, but journey times on the segregated section will remain consistent into the future. The transportation improvements justify the scheme. DfT considers that the Business Case demonstrates value for money, and funding has been agreed in principle.
	<i>“5 for PnR expansion; 1 for Rapid transit; 5 for City Centre restrictions.”</i>	Noted.
	<i>“The BRT is a complete waste of money and the eastern P&R in the wrong place.”</i>	The transportation improvements justify the scheme. DfT considers that the Business Case demonstrates value for money, and funding has been agreed in principle. Extensive consideration of alternative sites was undertaken, with the A4 Eastern Bath Park and Ride site being the chosen option.
	<i>“More Park and Ride.”</i>	The BTP will more than double Park and Ride provision in the City of Bath.
	<i>“Promote more the people to travel by train and use anymore cars in Bath Centre. Promote more the people to use the bicycle to get to work. Make sure that everyone do the recycling properly, that will reduce the mass of refuses in the city and impede the seagull and other animals to open the refuses bags and expend them everywhere.”</i>	The four shared priorities for transport investment are: Tackling congestion; Improving accessibility; Improving Air Quality and Improving road safety. These are key aims of the policy in the Joint Local Transport Plan.
	<i>“Q1 should have been separated out into its constituent elements. They are the most controversial and we should be able to give opinions on all of them not just a 'take it or leave it' approach.”</i>	Full consultation in relation to the BTP has been undertaken by the Council. This is recorded in the Consultation Statements that were published as part of the planning applications.

	<p><i>"Re 1-6: how can anyone possibly disagree? I live on London Road. Someone told me they had heard that 27,000 vehicles go past my home every day."</i></p>	<p>Noted.</p>
	<p><i>"Too much under one item, so half & half eg against bus rapid transit route – what is meant by "public transport free to move on Baths' historic streets"? – contradiction to: "access restrictions – "priority for cyclist pedestrians"?"</i></p>	<p>The BTP proposals include the creation of a more pedestrian and cyclist-friendly City Centre, through the introduction of access changes on a number of streets, and the expansion of pedestrian areas on High Street, which can currently be over-crowded and hard to navigate at busy times.</p> <p>The BTP includes bus priority measures and improvements to nine routes to bring them up to Showcase standards.</p>
	<p><i>"The BTP will only increase pollution and congestion, especially to areas such as Newbridge. The proposals are ill thought through and unsustainable. Improving the existing bus services and subsidising fares plus the introduction of a school bus plan would be far more effective."</i></p>	<p>Bath Transportation Package will:</p> <ul style="list-style-type: none"> • Reduce the number of cars entering the City by more than 1.5 million per year - <i>MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - <i>MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Result in journeys by public transport increasing by 2.2m per year - <i>MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Save 1500 tonnes of CO² emission per year, with benefits evident where they are needed most with the AQMA - <i>Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10</i> <p>Park and Ride buses operate without the need for</p>

		<p>subsidy.</p> <p>The Council provides £638,990 in financial support for non-commercial bus services from its own budget and is also distributing £248,861 in Rural Bus Subsidy Grant from the Government in 2009/2010.</p>
	<i>"Publish the BRT route east of Windsor Bridge Road (Clearly)."</i>	The route is detailed on the Council's web site, in the Frequently Asked Questions page of the BTP section.
	<i>"I believe the proposed Rapid Transit Scheme would be counter-productive to the environment."</i>	<p>Bath Transportation Package will:</p> <ul style="list-style-type: none"> • Reduce the number of cars entering the City by more than 1.5 million per year - <i>MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - <i>MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Result in journeys by public transport increasing by 2.2m per year - <i>MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</i> • Save 1500 tonnes of CO² emission per year, with benefits evident where they are needed most with the AQMA - <i>Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10</i>
	<i>"The BRT scheme is a deeply flawed project that will do little if anything to improve congestion or air quality in Bath. The project to turn Rossiter Road into a two way street is a very good one as it will improve air quality on Widcombe High St and slow down the speeding traffic on Rossiter Road."</i>	<p>See above response.</p> <p>Modelling work continues on alternative road layout options for Rossiter Road and Widcombe Parade. A workable scheme design is anticipated to be available by</p>

		early summer 2010.
	<i>"I would agree with the transport package, were it not for the BUS RAPID TRANSIT ROUTE."</i>	The segregated route provides the opportunity for BRT services to bypass congestion on existing routes. Congestion is forecast to worsen as demand increases, but journey times on the segregated section will remain consistent into the future.
	<i>"Expand park and ride to more areas."</i>	The BTP will more than double Park and Ride provision in the City of Bath, by expanding the existing Park & Ride sites and creating a new Park & Ride site to the east of the City.
	<i>"The Council should be congratulated on pressing forward with the Bath Transportation Package but on its own this will only make a minor contribution to air quality improvement. Where are the plans to stop coaches, full of walk-shy passengers, being driven up and down the City's Streets?"</i>	Coach restrictions currently apply by way of Traffic Regulation Orders to: the Royal Crescent; the Circus; Milsom Street; the Bus Gate at New Bond Street; and Pulteney Bridge.
	(London Road Area Residents Association) <i>"a) The city centre proposals may improve conditions for pedestrians and cyclists but will probably disadvantage the elderly and disabled by reducing their ability to access shops, banks and other services easily by car. However, we suspect that there will be little improvement in pollution levels as buses, coaches and taxis continue to have to wait at the High Street bus gate. As these further restrictions are introduced, more vehicles will be queuing for city centre car parking spaces or driving around looking for on street short stay spaces and pollution levels will increase as mentioned earlier.</i> <ul style="list-style-type: none"> o <i>b) The enlarged Park and Rides and possible new one in the east will, by the council's own admission in the planning applications, have little impact on air pollution levels locally or city wide.</i> o <i>c) Bus Rapid Transit (BRT) is an ill thought scheme which will achieve no improvement in air quality as revealed in the planning applications. In fact, it will certainly not be rapid except on the very short off road section and will cause delays to (and be delayed by)</i> 	<p>Bath Transportation Package will:</p> <ul style="list-style-type: none"> • Reduce the number of cars entering the City by more than 1.5 million per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in journeys by public transport increasing by 2.2m per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Save 1500 tonnes of CO² emission per year, with

	<p><i>other traffic, including local buses, when it rejoins the road system.</i></p> <ul style="list-style-type: none"> ○ <i>d) Showcase Bus routes and Bus Priority Measures should be considered but will make a negligible difference to air quality.</i> ○ <i>e) Real Time Information at bus stops, while being useful, will not affect air pollution either.</i> ○ <i>f) Quality Partnership Schemes sound wonderful but are not going to have any short term impact on air quality and pollution levels.</i> ○ <i>g) Active traffic management with parking availability information is long overdue and might have a small impact in the short term enabling drivers to get to a car parking space more efficiently.</i> ○ <i>h) Improved city centre signage will be welcome but will make little impact on air quality.</i> ○ <i>Appendix F (of the draft action plan) Air quality impact rating of 8 seems incorrect considering your Department's contribution to the planning applications for the BTP which judged the impact to be of negligible significance. Why is column 10 Disbenefits left blank?"</i> 	<p>benefits evident where they are needed most with the AQMA - <i>Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10</i></p> <p>The segregated route provides the opportunity for BRT services to bypass congestion on existing routes. Congestion is forecast to worsen as demand increases, but journey times on the segregated section will remain consistent into the future.</p> <p>The Bath Transportation Package includes proposals to upgrade nine key bus routes to Showcase standard. This means a range of improvements, including: Raised pavements for easy access on and off buses; real time information at the busiest stops, providing details of approaching buses; new bus shelters at sites where space allows; better timetable information. In addition, there will be new bus lanes and bus priority measures on some routes.</p> <p>The BTP proposals include introducing active traffic management with real-time information to direct drivers to locations where parking spaces are available.</p> <p>Scheme element should not be seen in isolation. The BTP is a holistic package of measures which include: Creating a Bus Rapid Transit route, including a 1.4km section of "off-street" dedicated bus route; Creating a more pedestrian and cyclist-friendly City Centre; Improving nine bus routes to Showcase standard; Introducing active traffic management with real-time information.</p>
	<p><i>(Vineyards Residents Association)</i> <i>"Our Association has supported the Bath Transportation Package (BTP), which we see as vital 'enabler' for tackling the problems of traffic and pollution in Bath. However, by</i></p>	<p>Bath Transportation Package will:</p> <ul style="list-style-type: none"> • Reduce the number of cars entering the City by more

	<p><i>itself the BTP will have little effect on traffic volumes. It is essential that BANES complements the BTP with other measures to reduce traffic coming into the city, to cut down on through traffic and to restrain visitor parking. We note that existing transport initiatives such as the BTP, the CIVITAS programme measures and increased car parking charges are expected to contribute to reducing pollution in Bath. We welcome the explicit recognition of the connection between parking policy and traffic and air pollution, but we consider that BANES should act on this logic by reducing the number of non-permit-holder parking spaces in the city centre. We have the following specific comments on the draft AQAP.”</i></p>	<p>than 1.5 million per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario)</p> <ul style="list-style-type: none"> • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011vs Do minimum scenario) • Result in journeys by public transport increasing by 2.2m per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Save 1500 tonnes of CO² emission per year, with benefits evident where they are needed most with the AQMA - Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10 <p>The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to test parking cost and capacity changes.</p>
	<p>(Bath Preservation Trust) <i>“The Trust welcomes the Council’s intention to deliver a comprehensive package of measures to tackle congestion and alleviate the pressure of traffic in and around the city of Bath. As we said in our response to the Public Realm and Movement Strategy, we support the intention to re-balance movement in the city centre, putting pedestrians, cyclists and public transport above the private car. We agree that this re-balancing will require a range of measures to improve public transport, enhance provision for pedestrians and cyclists, and restrict HGV movements.</i></p>	<p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p>
	<p><i>While many of the necessary elements are contained within the Bath Transport Package, we believe that there are some important omissions. In particular, we would like to see greater priority attached to reducing the number of HGVs travelling through the city (see below).</i></p>	<p>Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p>

	<p><i>The benefits of congestion charging. Concerted action to reduce the congestion caused by school runs is also urgently needed. And the Council's Vision for Integrated Transport makes no mention of a parking strategy for the city as a whole.</i></p>	<p>The Council is actively engaged in reducing car travel for journeys to school through school travel plans.</p> <p>The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to test parking cost and capacity changes.</p>
	<p><i>Park and Ride Expansion: The Trust has consistently argued that the first priority for transport policy must be to make it easier for people to complete the whole of their journey by public transport. Improvements to local bus and train services should therefore be a higher priority than developing new P&R facilities.</i></p>	<p>The Bath Transportation Package includes proposals to upgrade nine key bus routes to Showcase standard. This means a range of improvements, including: Raised pavements for easy access on and off buses; real time information at the busiest stops, providing details of approaching buses; new bus shelters at sites where space allows; better timetable information. In addition, there will be new bus lanes and bus priority measures on some routes.</p>
	<p><i>Expansion of Park and Ride provision around the edge of the city must be informed by a detailed understanding of the requirements for parking in the city to meet the needs of residents, commuters, shoppers and visitors. Bath needs a fully worked-out strategy for meeting those requirements, covering the city as a whole and addressing availability of spaces, pricing and operating hours within the city boundaries and at the P&R sites around the perimeter. We have seen no evidence that a comprehensive strategy on these lines exists or is in preparation.</i></p>	<p>The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to test parking cost and capacity changes.</p>
	<p><i>Park and Ride should operate 7 days a week and into the evenings to cater for weekend visitors and shoppers, and for evening leisure activities (cinema, theatres, restaurants etc). City centre retailers should be encouraged to collaborate to set up arrangements for delivering shoppers' purchases to the Park and Ride sites for collection later in the day.</i></p>	<p>Extension of operating time would require planning approval. This will be reviewed following the introduction of the Bath Transport Package related park and ride measures.</p>
	<p><i>A major part of the traffic congestion suffered by the City is caused by Home to School car trips. There is an opportunity to use the Park and</i></p>	<p>Noted. There are already a number of council supported</p>

	<p><i>Ride system to provide hubs for a comprehensive scheme of school transport (covering both the local authority schools and the independent sector). The Council needs to work with all the schools in Bath to devise a workable and affordable system which parents and children will be willing to use. Any expansion of P&R should be conditional on the introduction of integrated and affordable school bus services with pick-up/drop-off facilities at each P&R site to remove the need for parents from outside the city to drive into or across the city.</i></p>	<p>bus services for school children.</p>
	<p><i>The opportunity should also be taken to reduce the number of car journeys to the two Universities. In particular, the Eastern Park and Ride as well as Odd Down offer an opportunity to provide a shuttle service to the University of Bath campus at Claverton Down.</i></p>	<p>Both Universities have travel plans, Bath University's plan brings year on decrease in parking supply. Bus services to University's are commercial and well used.</p> <p>Use of Park & Rides for school buses raises issues of access to the sites due to concentration of movement at peak AM commuter time.</p>
	<p><i>City Centre Restrictions: BPT welcome proposals to restrict access to the city centre during the day (10am-6pm) and increase pedestrian priority.</i></p>	<p>Noted.</p>
	<p><i>While we support the general intention to improve the opportunities for gaining access to the city centre by means other than the private car, we believe that improvements in public transport and cycling provision will need to be complemented by a greater readiness on the part of the Council to introduce disincentives for private cars and goods vehicles. These disincentives might take the form of more extensive restrictions on vehicle access to the historic core of the city; limiting availability of city-centre car parking for commuters, shoppers and visitors coupled with extending residents' parking zones in the streets surrounding the city centre; and/or congestion charging. Congestion charging may be more effective in terms of improving air quality as well as easier to sell to the public if the level of charge is linked to the size of vehicle and/or emission levels.</i></p>	<p>Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to test parking cost and capacity changes.</p>
	<p><i>We recognise that there is a balance to be struck between the commercial needs of businesses at a time of economic recession and the need to reverse the dominance of the car which is currently damaging the character and quality of Bath's public realm. We believe that the apparent intention to follow a sequential approach – delivering the 'carrots' of better public transport etc ahead of any new 'sticks' to</i></p>	<p>The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to</p>

	<i>discourage private car usage – jeopardises the benefits which might be obtainable from the Bath Transport Package, since suppressed demand is likely to soak up any road space freed up by new P&R facilities and congestion and air pollution levels will fail to improve.</i>	test parking cost and capacity changes.
	<i>There is a need for a Traffic Management Plan for the whole city centre that fits with the objectives of the World Heritage Site Management Plan. Recently we have been invited to comment separately on proposals for the High Street, Pulteney Bridge, and Cheap Street, Westgate Street and a number of other city centre streets. We are also aware of discussions about altering traffic flows in Broad Street. Consideration needs to be given to the connections between all these streets and how they interconnect, as well as the consequential impact of changes in the centre on traffic flows in the wider city. It is no use looking at the problems piecemeal. A clear vision for the long term is essential for the benefit for the wider city. The area should be considered as a whole before any decisions are taken, although implementation will need to be phased in line with the availability of funding.”</i>	Noted.
	(FOBRA) <i>“FOBRA has pointed out previously that while the Bath Transportation Package (BTP) is important in its own right and represents a vital first step towards tackling the problems of traffic and pollution in Bath, it is essential that BANES complements the BTP with other measures to reduce traffic coming into the city, to cut down on through traffic and to restrain visitor parking.”</i>	Eight CIVITAS measures are being delivered in the City of Bath, by a broad range of partner organisations including Bath & North East Somerset Council. The CIVITAS RENNAISSANCE measures for Bath are: Alternative Fuels; Collective Transport; Freight Vehicle Demand Management; Mobility Management, Marketing Information and Education; Safe and Secure Infrastructure; Less Car Dependent, More Efficient Vehicles; Urban Freight; Innovative Telematic Systems. The Council are currently preparing a review of the parking strategy, following extensive surveys undertaken last year. The Council are also about to commission a parking cost model to add to GBATH. This will allow us to test parking cost and capacity changes.
	(Claverton Parish Council) <i>“The AQ Impact rating of 8 (Appendix F) is overstated and should be downgraded. The air quality assessment</i>	Bath Transportation Package will:

	<p><i>provided in the BTP P&R planning applications demonstrates that the Bath Transportation Package would have little or no beneficial impact on PM10 and NO2 levels across the whole of Bath, in particular along London Road, Bathwick Street and Beckford Road.</i></p>	<ul style="list-style-type: none"> • Reduce the number of cars entering the City by more than 1.5 million per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in journeys by public transport increasing by 2.2m per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Save 1500 tonnes of CO² emission per year, with benefits evident where they are needed most with the AQMA - Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10 <p>The cost benefit analysis (appendix F) is being revised for the final draft of the Action Plan.</p>
	<p><i>The air quality modelling incorporated in the P&R planning applications predicts that receptors predominantly exhibit NO2 changes only in the order of 1% and levels would remain well above the objective level at locations along the London Road section of the AQMA.</i></p>	<p>As above.</p>
	<p><i>The predicted changes in PM10 concentrations are, equally, of negligible significance and levels in Bath would continue to meet objective levels. Action 1, The BTP, would have little or no beneficial impact on transport related air pollution levels across Bath.</i></p>	<p>As above.</p>
	<p><i>We are concerned that the air quality impact assessment scoring (1-10) in Appendix F is not defined and recommend that this be clarified in the final AQAP.</i></p>	<p>Noted.</p>
	<p>(LoRARA) <i>“It is noted that there are other “inter-related initiatives” being prepared including the Bath Transport Package (BTP). The widening of vehicle access restrictions in the city centre between 10am</i></p>	<p>Bath Transportation Package will:</p>

	<p>– 6pm and the possible closure of Pulteney Bridge will probably improve the air quality in the centre. However it will lead to even more vehicle miles being driven by motorists around the perimeter roads such as Bathwick Street, Widcombe High Street, Queen Square and The Paragon with the additional pollutants belching out in the queues as happens already at times.”</p>	<ul style="list-style-type: none"> • Reduce the number of cars entering the City by more than 1.5 million per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in an annual reduction of some 5 million kilometres in car travel undertaken within the city - MSBC Vol. 1 Appendix 2C table 2C.25 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Result in journeys by public transport increasing by 2.2m per year - MSBC Vol. 1 Appendix 2C tables 2C.18-2C.20 (based on 5 day week for combined AM, PM and interpeak demand, 2011 vs Do minimum scenario) • Save 1500 tonnes of CO² emission per year, with benefits evident where they are needed most with the AQMA - Newbridge P&R and BRT Planning Application, Environmental Statement, TABLE 6.10 <p>The BTP proposals include the creation of a more pedestrian and cyclist-friendly City Centre, through the introduction of access changes on a number of streets, and the expansion of pedestrian areas on High Street, which can currently be over-crowded and hard to navigate at busy times.</p> <p>Proposals for the closure Pulteney Bridge to traffic are independent of the BTP.</p>
<p>2. Trials of low emission buses on Park and Ride</p>	<p>(Bath Preservation Trust) “The Trust considers that all new means of transport (such as the BRT) should be low emission. We welcome the intention to run a trial of low emission vehicles on some of the existing P&R routes.”</p> <p>(FOBRA) “A low emission bus might be attractive to passengers, but what is more likely to get them out of their private cars is a combination of good service, comfort and affordable fares.”</p>	<p>The trial will be undertaken by the Council’s partner bus operator as part of the CIVITAS project.</p> <p>The BTP provides a step change in transport provision in Bath. It includes proposals to upgrade nine key bus routes</p>

		to Showcase standard. This means a range of improvements, including: Raised pavements for easy access on and off buses; real time information at the busiest stops, providing details of approaching buses; new bus shelters at sites where space allows; better timetable information. In addition, there will be new bus lanes and bus priority measures on some routes.
3. Review emission reduction and fuel additive technologies	(Bath Preservation Trust) <i>"The Trust would encourage a feasibility studies and encourage measures for emission reduction. We would support a low emission zone covering the whole of the World Heritage Site."</i>	Noted.
	<i>"Action 15: alternative exhaust emissions abatement. The text on page 41 does not make clear which vehicle fleets would be considered for retrofit or other emissions control technologies. If the action applied to buses, then it is actually already covered by Action 13: monitoring of bus fleet quality, and hence is superfluous."</i>	Noted. Action 15 is intended to cover HGV fleets, council fleet and bus fleets. Action 13 and 15 possibly merged in final draft.
	(London Road Area Residents' Association) <i>"It is encouraging that technologies are becoming available which can help to reduce some pollutants. However are there going to be enough resources to undertake all these Feasibility studies and introduce the technologies into Bath's vehicle fleets?" "We do not believe that it is First's new buses that have led to greater use of public transport. It is more likely that the free travel offered by the Diamond card scheme and the reduced fares offered by some other operators are the reason. It is disappointing to read that Euro III engines will reduce particulates but may add higher emissions of NO2."</i>	It is intended that the AQAP is adopted as part of the JLTP3, thus resources will be found to undertake necessary studies providing the measure is also seen as viable in traffic and transport terms. Newer buses help to increase attractiveness of public transport. Further investigation is needed into emission characteristics of engines. In some cases, lower particulates mean higher NO2.
4. Feasibility Study for a Low Emission Zone	<i>"What use, what cost!"</i>	The purpose of a Low Emission Zone is reduce harmful emissions. Funding options will be explored prior to feasibility study undertaking.
	<i>"It is my understanding that over 60% of the NO₂ pollution within the city comes from buses and HGVs and yet nowhere in the paper are these identified as the primary source of the problem."</i>	It is stated in Chapter 5 (Nitrogen Dioxide Source Apportionment): <i>"The source apportionment shows road traffic contributes up to 90% of the total NOx</i>

		concentration, with HDVs contributing between 29 and 53%.”
	(London Road Area Residents Association) “A Feasibility study to explore the setting up of a LEZ sounds like a sensible option that could improve air quality in the medium term. Engine switch off zones should be implemented as soon as possible as new laws allow.”	Noted.
	(Vineyards Residents’ Association) “While we welcome proposals such as the feasibility study into a Low Emission Zone for Bath, the measures set out in the draft AQAP are not in our view sufficient.” “We strongly support the proposal for a feasibility study into a Low Emission Zone for Bath, especially given the disproportionate effect of HDVs on air pollution levels.”	Noted.
	(FOBRA) “We strongly support the proposal for a feasibility study into a Low Emission Zone for Bath, especially given the disproportionate effect of HDVs on air pollution levels. Since the study would not be completed before early 2011 and would take time to implement, we believe that there is a case for making a start with a Euro V standard. Whilst operators should have a reasonable time to acquire new vehicles or convert existing ones, the polluter pays principle should apply. We see little justification for a grant scheme to help vehicle owners. We strongly support restrictions on access to the city by coaches and an engine switch-off zone. Consideration should also be given to the use of the Park-and Rides for coaches and as school bus collection points.”	A recent assessment, based on an analysis of the 2009 Bathwick Street HGV survey and emission factors, suggests that a 21.3% reduction in HGV NOx emissions would be achieved with Euro IV as minimum requirement. A feasibility study would investigate financial obligations and lead-in time.
	(Dr David Martin) “This would provide an excellent means of controlling vehicle emissions in the city. In another of the CIVITAS Plus projects, the city of Aalborg has introduced an environmental zone in the city that from 2010 will require HGVs (in their case vehicles >3.5 tonnes) to comply with Euro IV or to have a particulate filter. (ARCHIMEDES project) Vehicles not complying with this standard are excluded. So there is no need for a charging system for non-compliant vehicles, but clearly enforcement of the standard would be important.” “A low emission zone would be the way forward to implement enforcement of better emissions controls for HGVs. The action should certainly be linked to Action 12: review Council and emergency service vehicle fleet, in order to identify new or retrofit vehicle technologies for purchase by B&NES and other public services.”	A feasibility study will investigate the potential of particulate trap requirements and consider the council and emergency vehicle fleet.

	(Bath Preservation Trust) <i>"The Trust would encourage a feasibility studies and encourage measures for emission reduction. We would support a low emission zone covering the whole of the World Heritage Site."</i>	Noted.
5. A Freight Consolidation Centre Demonstration	<i>"The proposed Transhipment Depot will be most welcome but by when can we expect to see building contracts let? We look forward to action and not trials and more discussions. Such depots have been an established part of the infrastructure of other historic cities across Europe for many years. Why are we lagging so far behind?"</i>	The Freight Transhipment Depot is one measure of the Civitas Renaissance project in Bath. The Council is working jointly with Bristol to procure this service, which should be operational later in 2010. There is no plan for the Council to build a Freight Consolidation Centre. This will be part of the procurement process, with the operator responsible for providing the facility. The continuation of the trial will be dependent on it becoming financially self-supporting.
	<i>"Don't you need a venue first?"</i>	This will be part of the procurement process, with the operator responsible for providing the facility.
	(London Road Area Resident's Assoc) <i>"Anything which reduces the need for HGVs to enter the city centre should be encouraged and it is hoped that enough businesses will support it."</i>	Noted.
	<i>"The example of Bristol is a good one to follow, and there are similarities between their Broadmead centre and our Southgate in terms of the types of retailers and their delivery requirements. However, for the many smaller independent shops in Bath, participating in a transhipment scheme may not be cost-effective, and other solutions may be needed for these retailers."</i>	The Freight Transhipment Depot one measure of the Civitas Renaissance project in Bath. The Council is working jointly with Bristol to procure this service, which should be operational later in 2010. The service will aim to meet the needs of retailers.
	(Bath Preservation Trust) <i>"A significant reduction in HGVs would deliver real benefits in terms of reducing congestion, improving air quality and minimising damage to the historic built environment. In principle, the proposed depot for consolidating deliveries to city centre businesses sounds a positive move and a demonstration of freight consolidation and the use of low emission vehicles to deliver goods to the City Centre is encouraged. But it must be accompanied by effective and enforceable measures to dissuade through traffic by HGVs. The management of freight in the city centre would need to be supported by</i>	The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.

	<i>the enforcement of Traffic Regulation Orders.”</i>	
6. Management of freight vehicles in city centre	<i>“Total ban on heavy goods vehicles in the city centre.”</i>	<p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The proposed Freight Consolidation Centre will help reduce the volume of delivery vehicles within the city centre.</p> <p>A total ban is unlikely to be feasible, as businesses need access and the FCC will not handle food deliveries.</p> <p>The BTP proposals include the introduction of access restrictions on a number of City Centre streets between 8am and 6pm.</p> <p>The A4 London Road and A36 through Bath are designated as National Primary Routes by the Department for Transport. As such, this limits the ability of the Council to impose environmental weight restrictions.</p>
	<i>“Stop lorries entering the city. Build ring road to Warminster Road.”</i>	<p>As above.</p> <p>A survey of HGVs on Bathwick Street in October 2009 showed that 60% of HGVs were through traffic. A significant proportion of those subsequently travelled south of Bath via Wellsway. There is currently no policy on an A36/A46 link. Investigative work on how impacts of traffic can be mitigated continues.</p>
	<i>“Each day a large number of HGVs ignore the 7.5t weight limit and take the Roman Road-Queens Square-Upper Bristol Road route through the city. Why have the Council and the police been so ineffective in their attempts to enforce this restriction? 44t lorries can be seen on this route at all times of the day and night, some from as far afield as Eastern Europe. It is also popular with skip-lorries en route to the Council's amenity site, with car transporters making deliveries to, or</i>	<p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p>

	<i>returning from the garages on the Upper Bristol road, plus all manner of other HGV, the drivers of which are clearly seeking whatever route they can find to avoid the congestion on the approaches to Cleveland Bridge. I would suggest that less than 1% of the HGVs passing through Queens Square are making deliveries to George Street or Milsom Street."</i>	
	<i>"Ban on HGV vehicles on London Road."</i>	The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.
	<i>"Eliminate all passing through HGVs."</i>	The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.
	<i>"Find some way to stop / limit through traffic - limit vehicle size or weight - along London Road and over Cleveland Bridge."</i>	The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.
	<i>"Build the link road between A36/A46 at Bathampton this would remove a lot of the through traffic. All the studies and investigations are a waste of money unless you deal with the main problems one of which is that you have too much through traffic."</i>	A survey of HGVs on Bathwick Street in October 2009 showed that 60% of HGVs were through traffic. A significant proportion of those subsequently travelled south of Bath via Wellsway. There is currently no policy on an A36/A46 link. Investigative work on how impacts of traffic can be mitigated continues.
	<i>"Less cars, except essential vehicles for health i.e. doctors and nurses, less HGVs even less taxis and buses in centre (make em walk!)."</i>	<p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The proposed Freight Consolidation Centre will help reduce the volume of delivery vehicles with city centre.</p> <p>The BTP proposals include the introduction of access restrictions on a number of City Centre streets between 8am and 6pm.</p>
	<i>"North / South route (A46/A36) should be limited for HGVs and thereby ease congestion and pollution on London Rd Bathwick St. Is the A350</i>	The Civitas Renaissance project is currently looking at

	<i>(Chippenham - Warminster) not a better route for North / South through traffic."</i>	<p>options for HGV Demand Management in Bath.</p> <p>The proposed Freight Consolidation Centre will help reduce the volume of delivery vehicles with city centre.</p> <p>A survey of HGVs on Bathwick Street in October 2009 showed that 60% of HGVs were through traffic. A significant proportion of those subsequently travelled south of Bath via Wellsway. There is currently no policy on an A36/A46 link. Investigative work on how impacts of traffic can be mitigated continues.</p> <p>Wiltshire County Council have been against banning through traffic in Bath, due to the knock-on effects particularly in Westbury.</p> <p>Any ban on HGV through traffic would need to consider mitigate against detrimental impact on the South of B&NES ie Norton Radstock routes for business.</p>
	<i>"The traffic on London Road, Bathwick Street, Sydney Place, Pulteney Rd is disgusting what a waste of money doing Batheaston bypass its done nothing for the City at all to get the HGVs off the City roads."</i>	As above.
	<i>"Get rid of tour buses and police HGVs coming through the city on illegal routes, particularly Lansdown Rd."</i>	<p>Tour buses have been reduced from 20 to 10 following introduction of a Traffic Regulation Condition for minimum Euro 3 engine standard.</p> <p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p>
	<i>"Enforce the weight limit for lorries on the Upper Bristol Road."</i>	The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.
	<i>"Lorries could be restricted and not permitted into the town centre</i>	A weight restriction is in place to prevent lorries passing

	<p><i>during the day 08:00-18:00, whether passing through or delivering.”</i></p>	<p>through.</p> <p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p> <p>The BTP proposals include the introduction of access restrictions on a number of City Centre streets between 8am and 6pm.</p>
	<p><i>“Too many lorries on Wells Road - restrict by size and weight lorry. More effort should be made to keep heavy lorries and railway container lorries from passing through Bath. They must be directed to use the motorways. This would help congestion hold-ups. Deliveries should be made before 10AM to shops in town to allow more pedestrian access during day.”</i></p>	<p>A weight restriction is in place to prevent lorries passing through.</p> <p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p> <p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The Freight Transhipment Depot is part of Civitas project. We are working jointly with Bristol to procure this service, which should be operational later in 2010.</p> <p>The BTP proposals include the introduction of access restrictions on a number of City Centre streets between 8am and 6pm.</p>
	<p><i>(Bath Preservation Trust)</i> <i>“A significant reduction in HGVs would deliver real benefits in terms of reducing congestion, improving air quality and minimising damage to the historic built environment. In principle, the proposed depot for consolidating deliveries to city centre businesses sounds a positive move and a demonstration of freight consolidation and the use of low emission vehicles to deliver goods to the City Centre is encouraged. But it must be accompanied by effective and enforceable measures to dissuade through traffic by HGVs. The management of freight in the city centre would need to be supported by</i></p>	<p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p> <p>Low Emission Zone could address HGV impact.</p>

	<p><i>the enforcement of Traffic Regulation Orders.”</i></p> <p>(London Road Area Resident’s Assoc) <i>“Anything which reduces the need for HGV’s to enter the city centre should be encouraged and it is hoped that enough businesses will support it.” “We would support HGV restrictions on Cleveland Bridge and effective signage from Bristol, the south coast ports and the M4 to divert HGVs whose business is not in Bath.” “LoRARA have always opposed the A46/A36 link and continue to do so as more recent studies have suggested that the majority of vehicles using the London Road have business in the B&NES area for study, work or leisure. Improvements to public transport vehicles, frequency and ticket pricing would have more impact on London Road’s air quality. There is no justification for causing further damage to the World Heritage landscape setting of Bath when recent studies – UNESCO Report (June 2009), DCLG Circular (July 2009) and the B&NES WHS Setting study (October 2009) all urge more protection from inappropriate developments in Bath’s surrounding countryside not less.” “We recognise that the Council’s hands are tied and that it is virtually impossible to do anything to improve air quality levels in the short term. The only strategies which might be effective would be a city wide Heavy Duty Vehicle (HDV) ban, a Draconian rise in parking charges allied to the removal of significant numbers of parking spaces and possibly congestion charging. All these will be unpopular with one group of motorists or another and would undoubtedly deter tourists and damage businesses.”</i></p> <p>(FOBRA) <i>“We believe that BANES should act now to reduce traffic in the city by measures such as an early HGV ban on Cleveland Bridge, reducing city centre parking provision, and traffic management measures which could include congestion charging. BANES should also actively pursue the creation of a north-south link to the east of Bath to avoid the need for through traffic to come into the city.” “We suspect that the high levels of NOx pollution from HDVs reflects the fact that they are often stationary or moving slowly in heavy traffic. Table 5.2 shows that around 80% of vehicles are cars and taxis. If effective measures were taken to reduce the number of private cars, less pollution might result from the HDVs. The Council should investigate this.” “Now that the Westbury by-pass has been stopped, BANES should press ahead with restrictions on HGV on Cleveland Bridge, notwithstanding opposition from Wiltshire Council. Bath should</i></p>	<p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>The proposed Freight Consolidation Centre will help reduce the volume of delivery vehicles with city centre.</p> <p>The BTP proposals include the introduction of access restrictions on a number of City Centre streets between 8am and 6pm.</p> <p>An HGV restriction on Cleveland Bridge is under consideration.</p>
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	<p><i>not pay the price of the local opposition campaign which led to the rejection of the by-pass application. We also consider that BANES should initiate work now to secure an A46/A36 link and pursue the option of congestion charging in Bath.”</i></p>	<p>A survey of HGVs on Bathwick Street in October 2009 showed that 60% of HGVs were through traffic. A significant proportion of those subsequently travelled south of Bath via Wellsway. There is currently no policy on an A36/A46 link. Investigative work on how impacts of traffic can be mitigated continues.</p> <p>Wiltshire County Council have been against banning through traffic in Bath, due to the knock-on effects particularly in Westbury.</p> <p>Any ban on HGV through traffic would need to consider mitigate against detrimental impact on the South of B&NES ie Norton Radstock routes for business.</p>
	<p><i>“Queens Square: Surely an Action Plan to reduce the amount of through traffic using Bath’s Queens Square is long overdue. A number of years ago, Bristol City Council took a bold but controversial decision to close the road that cut across their Queens Square. This has proved to be a major factor in transforming Bristol City centre for the better. Imagine the reaction now if there was a proposal to re-open it to through traffic, arguing that it would enable HGVs passing through the city to avoid other point of congestion. As part of the air quality action plan, our Council should be seeking to exclude from Queens Square all HGVs, except emergency vehicles and those making deliveries to premises in George Street.”</i></p>	<p>The partial closure of Queens’ Square has been identified as a potential measure in the Public Realm and Movement Strategy. There is a 7.5 tonne weight limit Traffic Regulation Order on Upper Bristol Rd (Windsor Br – Queen Sq); George Street; Chapel Row; London Road (between Walcot and Bathwick St); and Lansdown Road (3.5tonne) among others. However, there is an enforcement issue.</p> <p>The issue of enforcement was highlighted at a recent Civitas Stakeholder event. This has been raised with the Chief Constable.</p> <p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p>
	<p><i>“Cleveland Bridge: Because such a large proportion of the traffic in Bath is through traffic, the introduction of Congestion Charging would undoubtedly have an immediate positive impact on pollution levels in the city. However such schemes are not cheap, nor can they be implemented quickly. As an alternative, would it be legally and</i></p>	<p>The Civitas Renaissance project is currently looking at options for HGV Demand Management in Bath.</p> <p>A survey of HGVs on Bathwick Street in October 2009</p>

	<i>logistically feasible to levy a toll on all HGVs crossing Cleveland Bridge? All funds collected that were not required for the maintenance of the bridge would be held in an A46/A36 link road fund."</i>	showed that 60% of HGVs were through traffic. A significant proportion of those subsequently travelled south of Bath via Wellsway. There is currently no policy on an A36/A46 link. Investigative work on how impacts of traffic can be mitigated continues.
7. Trials of an innovative cycle hire system in the city	<i>"The Council should put measures such as cycle hire or car sharer schemes on the 'back burner' until it has taken significant, quantifiable steps to tackle the primary causes of the pollution."</i>	6 new spaces for the City Car Club have been created as result of the Civitas project. The project also includes the trial of hybrid Car Club vehicles.
	<i>"Cycling is not safe in City Centre."</i>	The BTP proposals include the creation of a more pedestrian and cyclist-friendly City Centre, through the introduction of access changes on a number of streets, and the expansion of pedestrian areas on High Street, which can currently be over-crowded and hard to navigate at busy times.
	<i>"Visitors walk about the city believing they are in pedestrian areas. Vehicles are a surprise to them. I observe this continually as a keen cyclist. To walk / cycle is beneficial to health so more free access for non polluting transport must be beneficial."</i>	The BTP proposals include the creation of a more pedestrian and cyclist-friendly City Centre, through the introduction of access changes on a number of streets, and the expansion of pedestrian areas on High Street, which can currently be over-crowded and hard to navigate at busy times.
	<i>"What happened to the cycle hire system - it was proposed last year?"</i>	The Civitas project includes the trial of a cycle hire scheme, including the choice of electric powered bicycles. The trials are scheduled for later in 2010.
	<i>"As long as cyclists behave courteously with awareness of pedestrians and consider that the pavement is not a cycle path."</i>	Noted.
	<i>"There is a massive new development in town, which has destroyed ancient back alleys - which were wonderful for cycling through town. Without a single cycle lane - i find it inexcusable. Now low emission, environmentally, green cyclists are forced onto the road (with no lane) alongside cars, for most of the bottom of town."</i>	Noted.

	<i>"Better to own a cycle."</i>	The Civitas project includes the trial of a cycle hire scheme, including the choice of electric powered bicycles. The trials are scheduled for later in 2010.
	<i>"This will only be of any use if somehow you make cycling safer in Bath."</i>	Noted.
	<i>"Bath is very hilly for cyclists so this will deter most people."</i>	The Civitas project includes the trial of a cycle hire scheme, including the choice of electric powered bicycles. The trials are scheduled for later in 2010. The 1.4km segregated section of the BRT route includes a shared footpath and cycleway.
	<i>"More and better cycle ways are needed in the city eg the one on London Road is a bit of a joke, cars always parked across it. More promotion of cycling and walking - ban cars from the central city - please!"</i>	The 1.4km segregated section of the BRT route includes a shared footpath and cycleway.
	<i>"The Trust is supportive in principle of measures to encourage cycling as a priority over the use of other vehicles in the City centre. The racks of bikes for hire should be located in sensitive positions so that they do not detract from the setting of important listed buildings and interfere with key vistas in the 18th century city, as they were planned."</i>	Noted.
	(LoRARA) <i>"We support these ideas but do not believe that realistically air quality will be improved as a result."</i>	It is recognised that other significant measures are required to improve air quality, however it is also important to investigate ways encouraging alternative modes of transport to the private car.
8. Expanding the City Car Club	(Bath Preservation Trust) <i>"The Trust is supportive in principle of measures to decrease dependency on private car ownership. The Car Club seems to offer a real alternative to car ownership for some people. Its expansion should be facilitated if there is demand. In particular, significant new residential developments within the city should be required to provide Car Club spaces in order to reduce the need for individual parking spaces."</i>	6 new spaces for the City Car Club have been created as result of the Civitas project. The project also includes the trial of hybrid Car Club vehicles.
	(FoBRA) <i>"Availability of the cars in the City Car Club is currently very good. Any expansion of the fleet should be accompanied by other measures to encourage use, eg wide publicity and a subsidy on the</i>	6 new spaces for the City Car Club have been created as result of the Civitas project. The project also included the trial of hybrid vehicles. Membership fees are not in Council

	cost.”	control.
	<i>(LoRARA) “It may be worth exploring the expansion of the City Car Club with environmentally friendly vehicles if funds are available. However air quality improvements will be very small.”</i>	6 new spaces for the City Car Club have been created as result of the Civitas project. The project also included the trial of hybrid vehicles.
9. Improve building emission assessments and incorporate into planning requirements	<i>(Bath Preservation Trust) “The incorporation of Building Emission Assessments into planning requirements will require the Council to have the necessary internal expertise to judge their adequacy. The planning enforcement team will also require the resources to monitor implementation and compliance.”</i>	Noted.
	<i>(LoRARA) “Obviously it would be useful for the council to be able to advise on how to reduce emissions but surely there is already Government literature freely available.”</i>	This option relates to prescribing extra measures specific to the AQMA in addition to central government legislation (building regulations).
	<i>“Georgian buildings should have heritage status rules revised for improvements of their insulation. While for example double glazing and other types of insulation out of the onlooker's sight seem unauthorised for authenticity, satellite dishes cover the facade walls of those properties.”</i>	A new type of double-glazing has re-opened the debate for period homes, thus increasing possibility of better insulation.
10. Investigate options for installation of electric charging points	<i>“The provision of charging points within existing car parks is preferred. The introduction of points to the roadside/pavements may result in further clutter to the street that would harm the setting of listed building, and the integrity and character of the Conservation Areas and World Heritage Site.”</i>	Noted.
	<i>“On page 32 of the consultation document, there is the mistaken claim that overall carbon emissions are not necessarily reduced by electric vehicles in comparison with diesel or petrol vehicles. In fact, electric vehicles have the potential to offer significant CO2 and greenhouse gas emissions reductions. I attach an extract from a recent government report for BERR and DfT which shows the CO2 emission factors on a well-to-wheel basis for electric vehicles compared with internal combustion engine vehicles. Emissions of gases from power stations which give rise to air acidification and photochemical oxidant formation are currently either higher or comparable from petrol or diesel vehicles; however by 2020, these emissions are likely to be lower due to the emissions controls being introduced on fossil-fuel power stations, and the long-term switch to renewable energy or</i>	The draft action plan text was intended to emphasise that electric vehicles are not ‘pollution-free’. There are ever-cleaner vehicles regularly coming onto the market e.g. the latest hybrid includes a small diesel engine just for charging the electric motor. Charge points for electric powered bicycles and hybrid Car Club vehicles will be looked at as part of the CIVITAS project.

	<i>nuclear energy power plant. There is therefore, a strong case for electric vehicles on CO2 emissions and air quality grounds, and B&NES should encourage the use of electric vehicles in the city centre as much as possible. A good route would be to take advantage of the government's offer of seed money for infrastructure development. In addition, B&NES could invest in their own electric or plug-in hybrid vehicles, such as light delivery vans or cars, and promote their use by other businesses in the city centre. This could certainly be combined with Action 8: city car club expansion by using electric vehicles for the additional cars used in the club."</i>	
	(FoBRA) <i>"The cleanliness Task & Finish Group strongly recommended that the Council should convert their cleaning fleet to low-emission electric vehicles. The first new purchases have not followed this advice. Most of the existing vehicles are elderly and polluting. Environmental Services should be encouraged to look at low-emission replacements."</i>	Charge points for electric powered bicycles and hybrid Car Club vehicles will be looked at as part of the CIVITAS project.
	<i>"Interesting ideas which are worth exploring if funding becomes available."</i>	Charge points for electric powered bicycles and hybrid Car Club vehicles will be looked at as part of the CIVITAS project.
	<i>"The installation of electric vehicle charging points would be a good investment, not so much because of the short term gain in terms of improved air quality but because it would deliver a strong message to the public that the Council is determined to remove polluting motor vehicle from the city centre. The first charging points to be installed should be close to the main taxi ranks. Once these have been installed the Council should offer incentives to taxi owners to encourage them to make an early switch over to electric or hybrid vehicles. The next step would be to permit only electric and low emission vehicles to use the bus lanes or enter certain streets within the city, such as Milsom Street and the Bus Gate."</i>	Charge points for electric powered bicycles and hybrid Car Club vehicles will be looked at as part of the CIVITAS project.
11. Feasibility study for use of Titanium Dioxide paint	(Bath Preservation Trust) <i>"This is an issue which is much wider than just the B&NES area. The Trust therefore recommends that any feasibility study should be funded by national government rather than by the local residents or local business community."</i>	Noted.

to reduce nitrogen dioxide		
12. Introduction of an ECOStars vehicle recognition scheme	<i>(Bath Preservation Trust) "The Trust is not convinced by the cost-benefits of the scheme, which would presumably require working with national and international operators if it is to be effective."</i>	Noted.
	<i>(LoRARA) "Yet another Feasibility Study proposed! How would this scheme be monitored? Will there be prizes for the 5star achievers and fines for the failures? There will be no quick improvements to air quality."</i>	5 star achievers will receive rewarded with good publicity, improving it's environmentally credentials. The PR gain is the incentive. It is recognised that this is a fringe or 'soft' measure and provides only marginal gains.
13. Studies on Wayfinding and Information Systems	<i>(Bath Preservation Trust) "The Trust supports proposals for a bespoke single multi-modal information and wayfinding system, and supports the intention to provide much better interpretation of the city. All physical development of the public realm must respect in spirit, and enhance in fact, the Outstanding Universal Values of the World Heritage City. Views of the picturesque landscape must also be protected, e.g. from potentially (visually) intrusive new installations such as totems. Designs for new installations in historic areas must be firmly rooted in the local traditional style, rather than too closely related to the 'fashions' of 2009."</i>	Noted.
	<i>"It is not clear from the consultation document whether this will be implemented across the city or only in the city centre and only at the Southgate area."</i>	Across the city.
	<i>"While a good idea to improve sign posting, maps and information, it is not going to affect or improve air quality. On board public transport information is long overdue and should have been installed on First's new bus fleet. It has been available on routes in other parts of the country along with real time information at some bus stops for many years."</i>	The BTP proposals include introducing active traffic management with real-time information to direct drivers to locations where parking spaces are available. The Civitas Renaissance project also includes a real time information initiative for which hardware field trials have commenced.














14. Investigation into options for Rossiter Road and Widcombe High Street road layout alterations	<p><i>"How long does it take to create a workable scheme for Rossiter Rd/Widcombe Parade? This has been on the drawing board since I worked for Avon County Council! I thought B&NES had finalised plans. If not then get on with it!!!"</i></p>	<p>Modelling work continues on alternative road layout options for Rossiter Road and Widcombe Parade. A workable scheme design is anticipated to be available by early summer 2010.</p>
	<p><i>"I live very near Widcombe High St (Pulteney Road) and we experience similar volume of traffic and need to be assured any scheme does not make our pollution worse. E.G. the bus gate hugely inc. traffic and pollution."</i></p>	<p>Prior to the introduction of the bus gate, traffic growth of 1.2% per annum in the central area. Within the inner cordon there has been an 11% decline in the central area. The roads that feed directly into Northgate Street have experienced significant drops in traffic levels of up to 70%. Milsom Street has experienced a drop of 40%, Walcot Street 18%, Manvers Street 7-18% and Queen's Square Place 6-9%. Public Transport use has increased substantially on services using the bus gate as it has achieved greater reliability.</p>
	<p><i>"I am concerned about the apparent failure to foresee congestion and routing problems approaching the new bus station down St James's Parade - the succession of traffic lights involved, and confusion over lanes, especially the left hand lane for traffic intending to cross the river when buses are using that lane for access returning to the bus station. After so many years of consideration surely a suitable solution can be found for cloistering Claverton St through Widcombe Village."</i></p>	<p>Modelling work continues on alternative road layout options for Rossiter Road and Widcombe Parade. A workable scheme design is anticipated to be available by early summer 2010.</p>
	<p><i>"The project to turn Rossiter Road into a two way street is a very good one as it will improve air quality on Widcombe High St and slow down the speeding traffic on Rossiter Road."</i></p>	<p>Modelling work continues on alternative road layout options for Rossiter Road and Widcombe Parade. A workable scheme design is anticipated to be available by early summer 2010.</p>
	<p>(Bath Preservation Trust) <i>"Any investigation, and recommendation for options will need to be supported by investigations into traffic management measures for the wider area."</i></p>	<p>Noted and that is the case with the modelling so far.</p>
	<p><i>"The Rossiter Road area of Widcombe is a congestion and air quality black spot and should be tackled within the current plan and not left to a future modelling exercise."</i></p>	<p>Noted.</p>
	<p><i>"We believe that Rossiter Road scheme would significantly reduce the high NO2 levels in Widcombe High Street and have a great positive</i></p>	<p>Noted.</p>







	<p><i>impact on Widcombe. We urge that the scheme should go ahead.”</i></p>	
	<p><i>“Why has the Rossiter Road /Widcombe High Street plan not been proceeded with as promised? Why is the modelling for this taking so long? Air Quality could be improved in the High Street at a stroke improving life for residents, businesses and shoppers.”</i></p>	<p>As above.</p>
	<p>(The Widcombe Association) <i>“Air Quality is a major problem in Widcombe High Street; we were therefore very concerned at the omission of the High Street from the list of “Pollution hotspots” on page 16 of the report. The data given elsewhere in the report shows that Widcombe High Street should be included in the second most polluted category with a concentration of nitrogen dioxide in excess of 50 micrograms per cubic metre. It is essential that the report is corrected as all concerned with highway planning should be left in no doubt of the seriousness of current pollution from road traffic.”</i></p>	<p>An error that has now been corrected.</p>
	<p><i>“The leaflet refers to “Investigation into options for Rossiter Road and Widcombe High Street road layout”. However, the only references in the report is in the Executive Summary, penultimate paragraph, where it is stated that “traffic management measures at Widcombe High Street and Churchill Bridge” are “not likely to be proceeded with in the lifespan of this Action Plan”, and on p.44 where it is stated “modelling exercises have shown that there are not sufficient benefits from the measures such as Rossiter Road revised layout and Churchill Bridge signalisation to pursue these options”. This begs the following questions/observations:</i></p> <ul style="list-style-type: none"> <i>○ What is the lifespan of the Action Plan? I can find no reference in the report</i> <i>○ Why does the leaflet indicate that the Rossiter Road scheme is being actively pursued when the Report states that it is not?</i> <i>○ We have not received the results of the current modelling, although we understand that it has been completed and that the results are unsatisfactory. We shall be challenging the findings and must make it clear that we do not accept that this closes the matter; furthermore, NO recent modelling has been undertaken of the air quality benefits from the scheme so the statement on p.44 is plainly wrong.</i> <i>○ If, a satisfactory scheme can be devised, the budget has been allocated for work in 2010/11; how can this</i> 	<p>Resulting from a miscommunication between Highways and ourselves.</p> <p>The lifespan of the plan depends upon future air pollution levels (monitoring data).</p> <p>Air pollution dispersion modelling is being undertaken with relation to the scheme.</p>

	<i>be outside the lifespan of the current plan?"</i>	
	<p><i>"In Table 7.2 on page 22, it is predicted that, if no further action is taken, air quality targets will be met in Widcombe by 2014 through the impact of replacing older polluting vehicles by modern less polluting ones. The underlying assumption is that there will be no increase in traffic volumes.</i></p> <ul style="list-style-type: none"> <i>o How can air quality be modelled on the basis of no increase in traffic volumes when the Rossiter Road Scheme is being tested on the assumption of an 18% increase due to Southgate?"</i> 	Noted.
	<p><i>"On p. 48 it is stated "There remains some work outstanding on the verification process with reference to the Lambridge, Widcombe and Pulteney Road areas that will be completed and reported in the final draft of this Action Plan."</i></p> <ul style="list-style-type: none"> <i>o Precisely what is outstanding for Widcombe?"</i> 	The modelling verification process was not completed at the time of writing. There was a particular inaccuracy in the Widcombe Parade area, which revised modelling has sorted out.

Appendices

Appendix A – Stakeholder list

Contact	Organisation	Address	CD?	Hard copy
Steve Crawshaw	Bristol City Council	Environmental Quality Unit, The CREATE Centre, Smeaton Road, Bristol BS1 6XN		
Peter Gendle	North Somerset Council	Scientific Officer, North Somerset Council, Town Hall, Walliscote Grove Road, Weston-super-Mare BS23 1UJ		
	Somerset County Council	County Hall, Taunton, Somerset TA1 4DY		
Jeffrey Downing	Mendip District Council	Mendip District Council, Council Offices, Cannards Grave Road, Shepton Mallet, Somerset BA4 5BT		
Pollution Control	Wiltshire County Council	Wiltshire County Council, Bythesea Road, Trowbridge, Wiltshire BA14 8JN		
Gerard Madden	South Gloucestershire Council	Castle Street, Thornbury, South Gloucestershire BS35 1HF		
Dr Kieran Morgan	B&NES Primary Care Trust	Director of Public Health, Trust Headquarters, St Martin's Hospital, Midford Road, Bath BA2 5RP		
	RUH	Royal United Hospital Bath NHS Trust, Combe Park, Bath BA1 3NG		
Ian Knight	South West Regional Development Agency	South West of England Regional Development Agency, 100 Temple Street, Bristol BS1 6AE		
Kate Allport	envolve	Green Park Station, Bath BA1 1JB		
	Government Office for the South West	2 Rivergate, Temple Quay, Bristol BS1 6EH		
Terry Wagstaff	West of England Partnership	Floor 1, Wilder House, Wilder Street, Bristol, BS2 8PH		
David Sledge	Highways Agency	Temple Quay House, 2 The Square, Bristol BS1 6HA		

Contact	Organisation	Address	CD?	Action Plan? (hard copy)
Rae Harris	Living Streets (formerly Pedestrians' Association)	1 Old Orchard Cottage, Walcot Street, Bath BA1 5BE		
Karl Jaeger	Bath Environment Campaign	7 Lansdown Crescent, Bath BA1 5EX		
Alex Schlesinger	Federation of Small Businesses - Bath	Montaque Antiques, 16 Walcot Buildings, Bath BA1 6AD		
Alun Morgan	Federation of Bath Residents' Associations	(see below - ONLY NEEDS ONE COPY!!)		
Alun Morgan	Bathwick Residents' Association	17 Forester Lane, Bath BA2 6QX		
Dr David Dunlop	London Road Residents' Association	Acacia Lodge, Kensington Place, London Road, Bath BA1 6AP		

Emails

johndixon@tabretts.co.uk

David Martin [davidmartin@btinternet.com]

Patrick Rotheram [vineyards@btinternet.com]

(see Mail folder)

Linda Thomas [Linda.Thomas@aeat.co.uk]

clavertonparishclerk@live.co.uk

ANN DUNLOP <bath.dunlops@btopenworld.com>

details

DEFRA assessor

<p>Bath Chamber of Commerce 01275 333128 / 01225 460655</p> <p>Neil Harper neil@harpersofbath.co.uk</p> <p>Sandy Bell TINTINNA@AOL.COM</p> <p>Ian Bell info@bathchamber.co.uk</p>
<p>Angela Ladd Federation of Small Businesses AngelaRLadd@aol.com 01761 432 254</p>
<p>Royal National Hospital for Rheumatic Diseases (The Min.) 01225 473440 Kirsty Matthews (P.A. Sheena Stewart) Sheena.Stewart@rnhrd.nhs.uk</p>
<p>Cathy Baker West of England Centre for Inclusive Living Cathy.Baker@wecil.co.uk</p>
<p>Gordon Popplewell Bath Association for Disabled People 01225 425887 Gordon.Popplewell@googlemail.com</p>
<p>Colleen Cleevely British Red Cross Society (Operations Director, Wiltshire Avon & Gloucestershire) Bradbury House Caxton Business Park 83 Tower Road North Warmley South Gloucestershire BS30 8XP Tel: 0117 301 2600 Fax: 0117 301 2615 CCleevely@redcross.org.uk</p>
<p>West of England Coalition of Disabled People (WECODP) Somerville Road, Bristol BS7 9AA</p>
<p>Sandra Niven Vision Bath 01225 446555 info@bwsbps.org.uk</p>
<p>Royal National Institute for Deaf People (RNID) RNID South West, Berkeley House, The Square. Lower Bristol Road, Bath BA2 3BH 01225 485778 information.southwest@rnid.org.uk</p>
<p>Colin Skellett Business Initiative for Bath & NE Somerset (also Chairman & Chief Exec of Wessex Water) Colin.Skellett@wessexwater.co.uk PA: Lisa.Hobbs@wessexwater.co.uk</p>
<p>Sue Dawson Age Concern Bath & NES admin@acbanes.co.uk</p>
<p>Nick Abercrombie Bath Citizens Advice Bureau Nick.Abercrombie@btinternet.com</p>

Anthony Dewberry (Deputy Vice Chancellor and Clerk to the Board of Governors) Bath Spa University College t.dewberry@bathspa.ac.uk
Martyn Whalley Director of Estates Bath University M.Whalley@Bath.ac.uk or VC-PA@Bath.ac.uk
Jessica Vallentine Business Link Bath & Wansdyke (Chief Exec) enquiry@businesslinksw.co.uk
Henry Brown Federation of Bath Residents Associations (FoBRA) Henry.Brown@BeThere.co.uk
Andrew Cooper City Centre Manager Future Bath Plus Andrew_Cooper@BathNES.gov.uk
James Scott Royal United Hospital (Chief Exec) ..or.. James.Scott@ruh.nhs.uk PA: Avril.Webb@ruh.nhs.uk
Joanna Robinson Bath Preservation Trust architecture@bptrust.org.uk 01225 338727
Rhona MacDonald Bath & NES Primary Care Trust rhona.macdonald@banes-pct.nhs.uk
Chief Superintendent Gary Davies Avon & Somerset Police (Bath & NES District Commander) gary.davies@avonandsomerset.police.uk richard.corrigan@avonandsomerset.police.uk steven.mildren@avonandsomerset.police.uk 0845 4567000
Dave Salmon Avon Fire & Rescue Service (Director, Risk Reduction) Helen.Howells@avonfire.gov.uk
Gary Weeks Gary.Weeks@AvonFire.gov.uk 0117 926 2061 (x8123)
Matt Atkinson City of Bath College atkinsonm@citybathcoll.ac.uk
Laura McMurtrie (Chief Executive) Avon & Wiltshire Mental Health Partnership Trust Caro.Steward@awp.nhs.uk
Jess Whiting (Sustainability Manager) Jessica.Whiting@AWP.NHS.uk 0117 378 4595 07825 112006
Peter Holloway Ian Miller SW of England Regional Development Agency (SWERDA) Peter.Holloway@southwestrda.org.uk Ian.Miller@southwestrda.org.uk PH – 0117 933 0233 (ext. 2233)
Alison Sherwin Bath Cycling Forum

Alison_Sherwin@BathNES.gov.uk 01225 394049
Sarah Flitter Luke Byron-Davies B&NES Local Strategic Partnership Sarah_Flitter@BathNES.gov.uk 01225 395050
Ken Taylor (Secretary) Bath Taxis Drivers Association taxis@blueyonder.co.uk 07711 145858
Mrs J E M Saunders Bath Club for the Blind 8 Greenacres, Weston, Bath BA1 4NP 01225 424468
Wendy Linham Traffic Liaison Officer Avon & Somerset Police
Jon Munce Multi jmunce@multi-development.com
Eric Stowe Senior Access Consultant (Leeds office) RNIB 10 Stillhouse Lane Bristol, BS3 4EB Eric.Stowe@RNIB.org.uk 0117 953 7750
Meri Rizk Bath People First meri@bathpeoplefirst.org.uk 01761 419659 David Melling Equality B&NES equalitybanes@hotmail.co.uk
Jim Warren Patrick Hutton Julia Bailhache Bath Heritage Watchdog
Ray Hardy First Somerset & Avon Ray.Hardy@FirstGroup.com
Fergus Hobbs Chairman Land Owners Forum L&R Developers 41 Milsom Place Bath 01225 789000 07970 793204 FHobbs@LRGroup.co.uk
Dr Kieran Morgan, Joint Director of Public Health NHS Bath and North East Somerset and Council St Martin's Hospital, Clara Cross Lane, Bath BA2 5RP t 01225 831839; f 01225 840407; e kieran.morgan@banes-pct.nhs.uk
Mr Worstall worstall@btopenworld.com 01225 311401

Appendix B – Leaflet

**Bath & North East
Somerset Council**

**A consultation on Bath's
Draft Air Quality Action Plan**

Have your say...



**How can we improve
air quality in Bath?**

Bath and North East Somerset Council is required by law to review and assess the air quality throughout the district. The Council has a comprehensive monitoring network that provides data on air pollution.

Levels of nitrogen dioxide are compared to the National Air Quality Objectives. If these levels exceed the objectives, an Air Quality Management Area (AQMA) must be declared and then an Action Plan must be undertaken.

The original Air Quality Management Area was declared in 2002 and covered an area including the London Road and Cleveland Bridge. Monitoring data has since indicated a need to expand the Air Quality Management Area, which now covers most of the principal road network in central Bath (see map overleaf for AQMA declared in 2008).

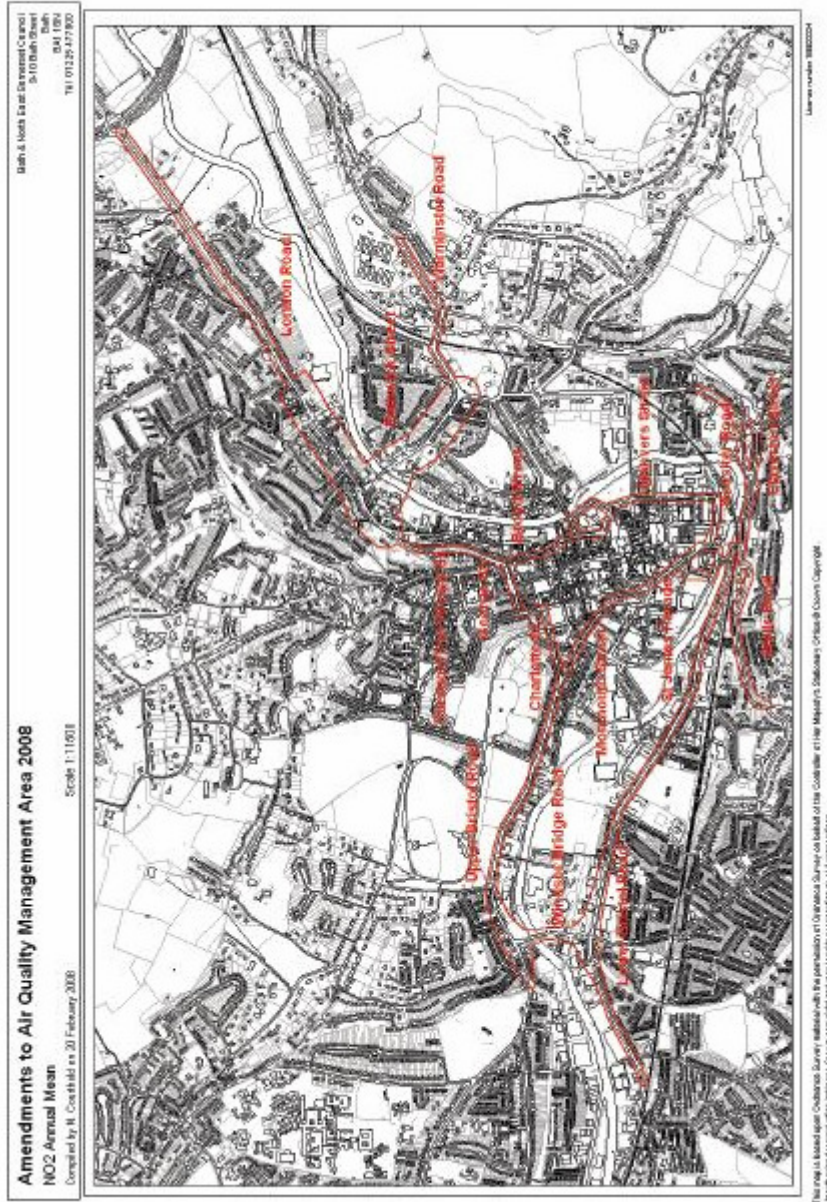
Monitoring data for 2008 shows that the annual average levels of nitrogen dioxide exceeded the objectives across the AQMA in the city centre. The highest concentrations of nitrogen dioxide were recorded at Lambridge, followed by Broad Street, Walcot Terrace, Wells Road (northern section), Victoria Terrace, Bathwick Street, The Paragon, Somerset Street and St James's Parade. Some areas were just above the air quality objectives including High Street, Lower Bristol Road and George Street.

AIR QUALITY ACTION PLAN MEASURES TO IMPROVE AIR QUALITY IN BATH

The Consultation Draft Air Quality Action Plan identifies a number of potential measures - including those already in progress - that will improve air quality. These include:

- **Bath Transport Package** which comprises a range of measures including: expansion of existing Park & Ride sites; a new Park & Ride to the east of the City; a Bus Rapid Transit route; Real Time Information for buses and new bus priority measures. As part of the Package, the Council recently consulted on proposals to introduce vehicle access restrictions on a number of City Streets, to create an environment where pedestrians and cyclists have priority and where public transport is free to move on Bath's historic streets.
- **Trials of low emission buses on two Park & Ride routes in the City.**
- **Review emission reduction and fuel additive technologies** and undertake a feasibility study for introducing into vehicle fleets using Bath. This could include monitoring of bus fleet quality to establish emission characteristics and maintain the high standard of vehicles;
- **A feasibility study for a Low Emission Zone** which would require heavy goods vehicles to meet a high standard of engine emissions or not be permitted to pass through. This could be introduced for a broad area or at pollution hotspots. It could be introduced in connection with a freight transhipment scheme where goods are transferred onto low emission vehicles at a site on the edge of the city for deliveries into the centre;
- **A Freight Consolidation Centre** demonstration for the City of Bath, using a low emission vehicle to deliver goods to City Centre businesses.
- **Management of freight vehicles in the City Centre**, which could be introduced in connection with the Freight Consolidation Centre.
- **Trials of an innovative cycle hire system in the City**, which will include provision of electric-powered cycles in addition to conventional bicycles.
- **Expanding the City Car Club**, with the provision of additional vehicles and parking spaces.

please turn over...



...continued

- **Improve building emission assessments** and incorporate into planning requirements. Buildings themselves are a significant source of nitrogen dioxide and it could become a requirement to undertake an assessment and identification of measures to reduce emissions.
- **Investigate options for installation of electric vehicle charging points.** This may also include a battery exchange scheme. The charging points could be installed in public car parks and at roadside spaces.
- **Feasibility study for use of titanium dioxide paint to reduce nitrogen dioxide.** Trials in other areas show that painting the road and pavement with a transparent paint at pollution hotspots have helped reduced nitrogen dioxide levels through a photosynthetic process. The possible negative effects need to be further researched.
- **Introduction of an ECOstars Vehicle Recognition Scheme,** which awards cleaner HGV operators. This scheme involves working with fleet operators to establish the specification of vehicles and publicising the award of a 5-star rating for operators when their vehicles have reached the required emission standards.
- **Studies on wayfinding and information systems** to make travel around the City easier for pedestrians and cyclists.
- **Investigation into options for Rossiter Road and Widcombe High Street road layout alterations.**

WE WANT TO KNOW WHAT YOU THINK

The Council welcomes your comments and suggestions on improving air quality in Bath. An informal public display will take place on **Wednesday 25th November** from 1630 to 2000 in the **Guildhall**. You can get a copy of the Consultation Draft Air Quality Action Plan and air quality monitoring and modelling data from the address below. The consultation period ends in early January.

Please complete the enclosed questionnaire or send an email or letter to the following address by **Friday 15th January 2010**:

Bath & North East Somerset Council
 Environmental Monitoring
 Public Protection
 FREEPOST (BA1458)
 Bath
 BA1 1ZZ
 Tel: 01225 398622
 Email: environmental_monitoring@bathnes.gov.uk

This document can be made available in a range of languages, large print, braille, on tape, electronic and accessible formats from 01225 477495.

DP 4857 11/09 JM

Appendix C – Consultation Press Release



For immediate release.

17.11.09

Have your say on Air Quality in Bath

Local residents and businesses located around the major road network in Bath are being given the chance to give comments and suggestions about improving air quality as part of an engagement exercise carried by Bath & North East Somerset Council.

The Council must get people's views on air quality in places designated as an Air Quality Management Area and submit the findings to the Government.

Councillor Charles Gerrish (Conservative, Keynsham North), Cabinet Member for Customer Services, said: "This is an opportunity for Bath & North East Somerset Council to update people in the air quality management area about the measures the Council is proposing to improve quality and for people to have their say. Some of the measures are well known, such as a freight transhipment depot to reduce HGV traffic. But others like considering the use of electric charging points for vehicles will be new to local people. This is a chance for people to give their view."

The document distributed to households and businesses informs people that the annual average pollution level was exceeded across the city centre in 2008 and that high concentrations were found at Lambridge and in Broad Street, Walcot Terrace, Wells Road (northern section), Victoria Terrace, Bathwick Street, The Paragon, Somerset Street and St James's Parade. Some areas were marginally in excess of the air quality objectives including High Street, Lower Bristol Road and George Street.

Premises within the air quality management area will receive a letter and leaflet with questionnaire over the next week. An informal public display will take place at the Guildhall on Wednesday 25th November from 4.30pm to 8pm. The consultation period ends January 15th 2010. Find out more by going to www.bathnes.gov.uk/airquality

ENDS