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Bath and North East Somerset CAZ proposal – a response from the The Pulteney Estate Residents' Association

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We fully support the initiative of the Clean Air Zone (CAZ) for Bath, and BANES' aim to create a clean air city that will benefit the whole population of Bath. We also thank BANES' Officers who have worked so hard to advance the project to this point. However, in the current proposal there is a large section of eastern Bath that is by default destined to be the Dirty Air Zone – thus polluting BANES' plan.

We are deeply concerned that the asymmetry of the proposed CAZ boundary results in an illogical and inconsistent exclusion of the area in and around The Pulteney Estate and, for the reasons outlined below, we urge that this omitted area is included in the CAZ as a matter of priority. See Appendix 1 for a map outlining our CAZ extension proposal.

1. Excluding the Pulteney Estates area undermines the objectives of the Clean Air Zone by:

1.1. Excluding the A36

BANES' main aim is to urgently reduce air pollution to improve health. However, the current proposal excludes the A36, the only principal road that is excluded from CAZ, and as the data suggests below, one of the most heavily used and congested roads in Bath. See Appendix 2 of an image taken on 11.09.2018 as an example of polluting traffic on Sydney Place. The polluting effect of the A36 is itself acknowledged in BANES' 2016 Air Quality Annual Status Report (ASR)¹ and again in the report's reference to the benefits of the redesign of Widcombe, away from the A36.

In fact, the decision to exclude the A36 appears to have been made based on inaccurate or absent data. For example, the measurement of 28µg/m³ of nitrogen dioxide shown on the A36 near Widcombe School is wrong and has been confused with data taken from Widcombe Parade. Measurements on the A36, outside the school and during term time exceed 40 ug/m³ of nitrogen dioxide.²

Equally the 2016 report describes Sydney Place on the A36 as a local priority and challenge, and includes an image (see Appendix 3) of Sydney Place complete with sensor. The value reported by BANES exceeded 50 ug/m³ but for some reason was considered irrelevant to the proposed plan.³ This reading should have signalled an urgent need to be addressed.

¹ BANES' 2016 Air Quality Annual Status Report (ASR): "In Bath through-traffic, particularly on the

² 2017 BANES Air Quality Report, page 48 Table A.3; and page 64 in Table B.1. Widcombe Parade is incorrectly identified as "Widcombe High Street" – see Sensor DT18, compared with Sensor DT17 on the A36.

³ 2017 BANES Air Quality Report, page 32, Table D.3 on page 82

There is no further specific mention of measures to be taken to tackle the challenges of the A36 in either of BANES 2017 and 2018 Air Quality Reports.

1.2. Excluding key heritage attractions

Our community is in the Heritage Centre of Bath with its significant Georgian architecture and tourist attractions, including, for example, (Old) Sydney Place (Jane Austin), New Sydney Place (King William 1V and Queen Charlotte), the world famous avenue - Great Pulteney St, and the Holburne Museum with the only remaining eighteenth century Pleasure Gardens in the United Kingdom.

These locations attract significant volumes of visitors throughout the year who will now be even more at risk of poor air quality.

2. Adversely Impacts on the area, including vulnerable people

Excluding The Pulteney Estate and the A36 from the CAZ will inevitably create increased traffic along the city section of the A36, as high emission vehicles will attempt to avoid the CAZ charges. This will also create a rat run along and around the A36, putting at risk children and young people attending the local schools and others who move around the area. The adverse impact of high emission HGVs, coaches, buses and cars, commuting to or through the city, or carrying and depositing tourists - scouting the area for somewhere to park or hover - will put at risk the local residents, which includes a high proportion of older people, children and young people. This contradicts BANES own aim to target the pollutants (only 25% of traffic is from residents of Bath)⁴ and not those at risk. There appears to have been no consideration of the impact on these groups of people.

There is clear evidence of the disastrous impact of toxic emissions on, for example, asthma and bronchitis sufferers⁵ as well as on levels of intelligence and the onset of dementia⁶ that supports your aim. Your current proposal will uniquely threaten the health and well-being of our community, who are left out of your plan. We need and want to be in the **Clean Air Zone**.

⁴ 2017 BANES Air Quality Report

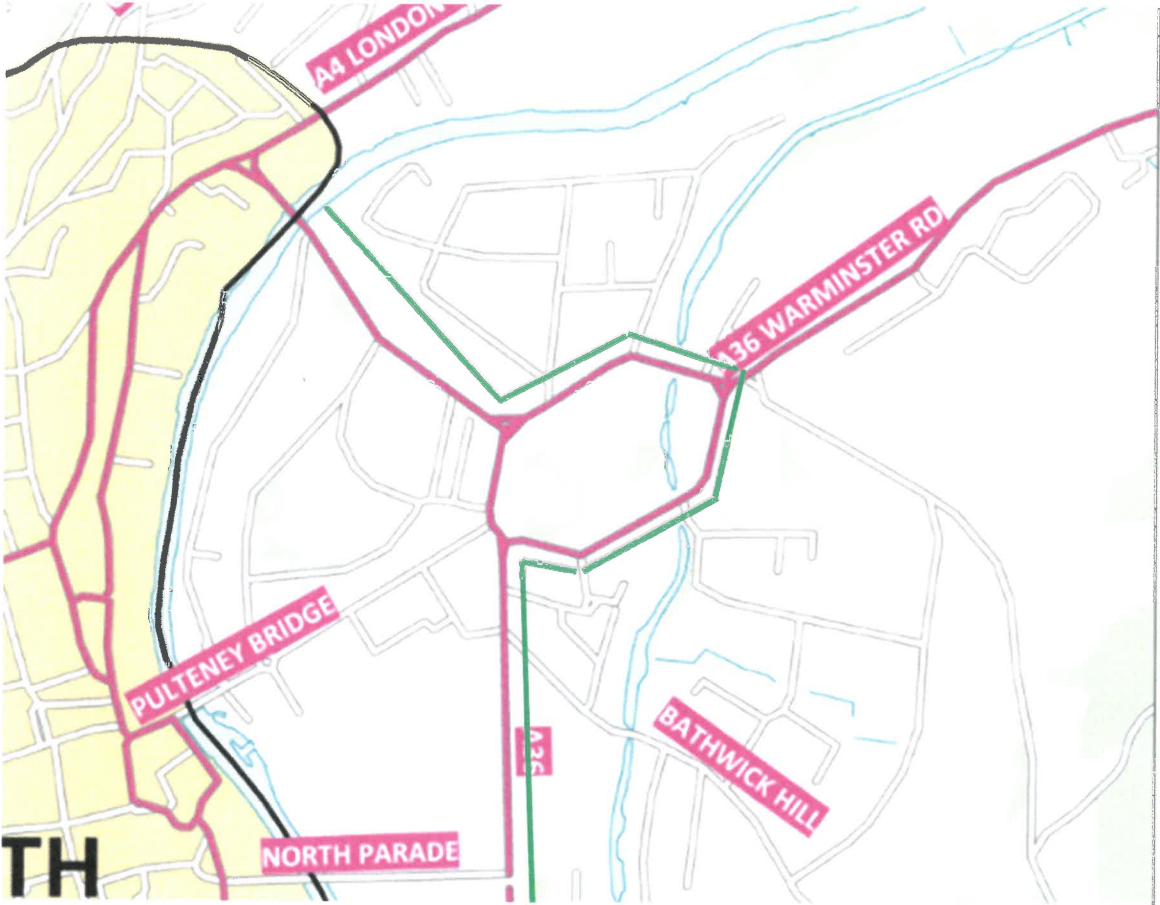
⁵ World Health Organization, 'Review of evidence on health aspects of air pollution – REVIHAAP Project', 2013 www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final

⁶ Air Pollution Has a Massive Impact on Early Brain Development
<https://futurism.com/air-pollution-massive-impact-early-brain-development/>

This is your brain on air pollution –
<https://arstechnica.com/science/2018/08/this-is-your-brain-on-air-pollution/>

Appendix 1

Proposal (green line) for eastern extension to Clean Air Zone to include heritage area from Pulteney Bridge to Sydney Gardens



Appendix 2
A36 Sydney Place, including Jane Austen's House (4 Sydney Place)
11 September 2018 - afternoon



Appendix 3

Extract from BANES 2017 Air Quality report, page v of Executive Summary

Bath & North East Somerset Council

Local Priorities and Challenges

The priority for the coming year is to renew the Air Quality Action Plan for Bath ⁽⁶⁾. The Council is consulting on generating options for the plan in the winter of 2016, with a view to adopting the plan in 2017. In preparation for this, the Council has enhanced its monitoring capabilities with the purchase of two new lamppost mounted monitors that send live air quality data to the Council. These are being deployed across the district to respond to air quality concerns.



AQMesh Automatic air pollution monitor - Sydney Place, Bath

The challenges for Bath are made greater by its attractiveness and status as a UNESCO World Heritage Site which means that it has a significant amount of tourist traffic, its environmentally sensitive setting and the existence of the Primary Route network on the city streets of the A46 and A36.

