

B&NES Communities, Transport and Environment Policy
Development & Scrutiny Panel Meeting – 29th October 2018

Agenda Item 9: Proposals for a Clean Air Zone in Bath

Statement by Chris Beezley

B&NES has to respond to a Government directive to explain how it plans to restrict NO₂ emissions to no more than 40µg/m³ in the shortest possible time.

It is claimed that the only viable solution for Bath is to impose an extensive Class D CAZ, hugely expensive to the local economy and forcing drivers of diesel cars bought new in good faith barely 3 years ago, and of older petrol cars, to either scrap their vehicle or be charged £9 per day for the privilege of crossing the city or shopping at Sainsburys Green Park, for example. B&NES further claims that “not charging higher emission cars (a Class C zone)...would not sufficiently reduce NO₂ in the time available.”

Only now that the Business Case has been made public is it possible to challenge these far-reaching claims. The associated Air Quality Modelling Report lists 110 locations across Bath where NO₂ concentrations currently exceed 40µg. 65 of these are predicted to become compliant naturally by 2021 due to improvements in engine technology, driving habits, etc.

The Modelling Report also shows that all but two of the remaining 45 problem locations would become compliant by 2021 if a Class C zone were introduced, instead of the Class D zone proposed. This would remove cars from the equation. Under this scenario, for example, London Road would fall below 36µg and Dorchester Street 32µg.

It is important to note that the modelled difference between imposing a Class C or D zone is typically only 1µg/m³ at any location. If confidence in this unexpected result is an issue, modelling should be improved. I submit that imposing a Class D zone would therefore be akin to ‘using a sledgehammer to crack a walnut’ and arguably a Congestion Charge by another name.

Turning now to the two remaining problem locations, the Modelling Report predicts that particularly high NO₂ levels at either end of a half mile stretch of the A4 - at Gay Street and near Cleveland Place – would reduce to 40 or 41µg whether the CAZ is Class C or D. Not only is that surprising, it is so close to the Government target that it is surely far fairer to impose the far less Draconian Class C zone, supplemented by specific local traffic management measures on this short stretch of the A4 to ensure that the target is fully met. I understand that traffic restrictions are already planned for Gay Street and The Circus - others may be necessary, such as re-phasing traffic signals. To achieve even lower NO₂ levels here, why not introduce a small Class D Ultra Low Emission Zone (much like London’s, to include cars) on this short problem stretch of the A4?

By 2021 it is predicted that only 20% of cars would be affected, so relatively little east-west traffic would opt to divert north via Camden or Julian Roads or south via Widcombe, where NO₂ levels would be well below target.

Finally, The Government states that a plan will only be considered for funding support, if the effects and impacts on local residents and businesses have been assessed and there are no unintended consequences. Is it B&NES' intention to unnecessarily punish residents, beleaguered car drivers and businesses across such a wide area of the city when the real problem area is so localised?

I therefore suggest that a credible alternative solution does indeed exist, and I call on this meeting to commission urgent modelling of the solution described to avoid compromising Government funding due to the 'sledgehammer' approach.

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