

Richard Luetchford Cabinet on 5th March 2019

The two options being considered today are both based on the concept of a vehicle-charging CAZ.

There is however a growing body of evidence emerging from elsewhere in the UK that suggests these are not the right solutions for Bath.

Nearly every other one of the 27 cities directed by DEFRA to take action experiences much higher airborne NO₂ pollution levels than Bath.

Bath is a smaller and comparatively less polluted city than most, and right near the bottom of DEFRA's list of priorities.

Even here, DEFRA only directed the Council to take action on air pollution levels along a single half mile stretch of the A4.

In recent months, 3 of the 6 cities with the highest levels of NO₂ air pollution in the country, Nottingham, Southampton and Derby, have all elected to implement non-CAZ solutions.

Their approach is entirely consistent with DEFRA guidelines and Nottingham's has already been approved by DEFRA.

If these three much higher priority cities can achieve compliance with NO₂ limits using exclusively non-CAZ measures, it is very hard to see why similar measures can't do the same for Bath.

Compared with a charging CAZ, they would certainly be far less costly, they would cause less economic damage to this area, and less personal hardship to those directly affected by CAZ charges.

According to the Council's own figures, a vehicle-charging CAZ for Bath needs up to £43M of government funds to implement and operate.

Leeds is a much bigger city than Bath and one of the top 6 with the highest levels of NO₂ air pollution in the UK.

It has requested £40M of government funds for a CAZ B scheme.

However DEFRA wants at least a £9M shaved off Leeds' request.

It also requires evidence as how the city council will support the most vulnerable businesses and drivers affected.

This even though Leeds' proposed CAZ charges are half Bath's.

Given what's happening there, it is not clear how this Council will be able to secure all the funds it needs for a charging CAZ, or what would happen if there is a serious shortfall.

Assurance from DEFRA that the funding requirements can be met would help to allay these concerns

But in any case, a CAZ installation for charging vehicles in this city is unlikely to be needed for more than 2-3 years, as I understand it.

By the end of that time, NO2 levels will have fallen to below the legally-permitted limit.

That's because they are predicted to decline naturally, by about 10% per annum.

The hugely expensive CAZ installation will then have to be switched off and dismantled, in accordance with DEFRA guidelines.

It will thus provide Bath with no lasting benefits.