



Bath Clean Air Plan

Bath and North East Somerset Council

Stakeholder Management and Engagement Plan

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1. Introduction

Poor air quality is the largest known environmental risk to public health in the UK¹. Investing in cleaner air and doing more to tackle air pollution are priorities for the EU and UK governments, as well as for Bath and North East Somerset Council (B&NES). B&NES has monitored and endeavoured to address air quality in Bath, and wider B&NES, since 2002. Despite this, Bath has ongoing exceedances of the legal limits for Nitrogen Dioxide (NO₂) and these are predicted to continue until 2025 without intervention.

In 2017 the government published a UK Air Quality Plan for Nitrogen Dioxide² setting out how compliance with the EU Limit Value for annual mean NO₂ will be reached across the UK in the shortest possible time. Due to forecast air quality exceedances, B&NES, along with 27 other Local Authorities, was directed by Minister Therese Coffey (Defra) and Minister Jesse Norman (DfT) in 2017 to produce a Clean Air Plan (CAP). The Plan must set out how B&NES will achieve sufficient air quality improvements in the shortest possible time. In line with Government guidance B&NES is considering implementation of a Clean Air Zone (CAZ), including both charging and non-charging measures, in order to achieve sufficient improvement in air quality and public health.

Jacobs has been commissioned by B&NES to produce an Outline Business Case (OBC) and Full Business Case (FBC) for the delivery of the CAP; a package of measures which will bring about compliance with the Limit Value for annual mean NO₂ in the shortest time possible in Bath. The OBC assessed the shortlist of options set out in the Strategic Outline Case³, and proposed a preferred option including details of delivery. The FBC develops the preferred option set out in the Outline Business Case, detailing the commercial, financial and management requirements to implement and operate the scheme. The OBC and FBC form a bid to central government for funding to implement the CAP.

This document is written to support the OBC and FBC and describes the way in which the public and stakeholders have been, and will continue to be engaged in the development of the CAP. It was originally prepared to support the draft OBC which formed the basis of a formal consultation during October and November 2018, it was updated in February 2019 to support the final OBC. It is intended to be a live document, updated as the project progresses. This version was prepared in May 2019 and updated in August and November 2019 to support the FBC. It provides an overview of engagement undertaken to date and an outline of intended future engagement with stakeholders and the public during the next stage of preparation of Bath's Clean Air Plan and the implementation phase of the scheme.

1.1 Charging Clean Air Zone

NO₂ pollution is primarily caused by vehicle emissions. To tackle this, the Council is assessing options to reduce these emissions as quickly as possible in line with the requirements of the Directive. The development of the Clean Air Plan includes the consideration of the implementation of a Charging Clean Air Zone (CAZ).

A CAZ is defined as a specific geographical area where targeted action is taken to improve air quality through charging a daily fee to vehicle owners to enter, or move within, the zone if they are driving a vehicle that does not meet the particular emission standard for their vehicle type in that zone.

A CAZ is different to a congestion charge. A CAZ aims to improve air quality through discouragement of high emission vehicles. A congestion charge targets high traffic flow. The Government is providing funding for Local Authorities to implement charging CAZs within their area.

¹ Public Health England (2014) Estimating local mortality burdens associated with particular air pollution.
<https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution>

² <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

³ Bath and North East Somerset Council Clean Air Plan: Strategic Outline Case, March 2018
http://www.bathnes.gov.uk/sites/default/files/siteimages/Environment/Pollution/strategic_outline_case_bath_28.03.2018_with_annexes.pdf

A CAZ would be supported by non-charging measures, which would prompt and help enable behaviour change and transport modal shift. Funding for non-charging measures is available through two methods: The Clean Air Fund, which B&NES will bid for from central government, or from available additional Scheme revenue.

1.2 Stages in the development of the Clean Air Plan

The development of the Clean Air Plan for Bath is following a 3-stage Business Case process. This reflects the process set out by the Joint Air Quality Unit (JAQU), and within the HM Treasury Green Book, and is required to secure the funds for implementation.

In brief, the three stages are:

- Strategic Outline Case (SOC) – this phase is complete. It explored a long list of possible options and concluded that the introduction of a Clean Air Zone (CAZ), with charges for non-compliant vehicles within the CAZ, was the only mechanism capable of delivering compliance with legal limits by 2021. It identified three packages of measures for further consideration.
- Outline Business Case (OBC) – this phase is complete. The draft OBC assessed the three short listed options in the SOC and identified a Class D CAZ as the preferred option most likely to deliver compliance by 2021. The draft OBC then formed the basis of a formal consultation on the Scheme during October and November 2018. Further technical assessment and feedback on the preferred Scheme from the consultation was considered and is reported in a revised OBC. This identified two options with potential to achieve compliance in the shortest possible time: a revised Class D CAZ (incorporating changes in response to feedback) and a Class C CAZ option (the preferred option), with traffic management and signal timing changes. In March 2019 B&NES elected Cabinet Members made the final decision to take forward the Class C option to the Full Business case stage.
- Full Business Case (FBC) – this is the current phase of the project. This stage develops the preferred option further providing further detail on scheme specifics, so that the CAP can be implemented.

A Charging Order is required for the Scheme to become operational and as part of this process there is a need to promote the Charging Order. This will happen alongside the development of the FBC.

Following completion of the business case, there are two further stages in the development of the Clean Air Plan. At this point, the communications with stakeholders and the public will become more focused on publicity and advice, rather than discussion of the proposed solution:

- Scheme implementation – this stage will put in place the infrastructure required to enable the Scheme to become operational. This includes cameras, signage, the back-office systems and the processes needed to facilitate the supporting measures; and
- Scheme operation – this stage is when the Scheme becomes live, including both the supporting measures and the charging of non-compliant vehicles.

1.3 Purpose of this Engagement Plan

Engagement with the public and stakeholders is an important part of developing the Clean Air Plan (CAP) for Bath. The Council has made a commitment to communicate with both the public and stakeholders throughout the development of the Plan and implementation of the measures required to reduce emissions. This process began in February 2018 and is ongoing.

The development of a CAP for Bath and the implementation of a CAZ, will directly or indirectly affect a wide range of people, groups and organisations. In this context, the vision of this Engagement Plan is that all interested parties will:

- Understand the air quality problem in Bath, the effects of the problem on health, the proposed measures to improve air quality and the implications for travel choices; and

- Engage with the process of identifying measures to address the problem.

A wide range of engagement activities, as well as a formal public consultation have already been carried out. This Stakeholder Management and Engagement Plan provides an overview of this work and builds on this to provide an outline of intended engagement with stakeholders and the public during the next stage of preparation of Bath's Clean Air Plan, specifically to support the FBC stage of the process and activities to support the implementation of the scheme.

This Plan forms an appendix to the main FBC document but remains a 'live' document that will be utilised and updated by the project team on a regular basis.

1.4 Structure of this document

Having a Stakeholder Management and Engagement Plan in place is an essential component for good project management. This document:

- Sets out the aims and objectives that underpin all the engagement and communications work on this project – Section 2;
- Identifies the key stakeholders with an interest in the CAZ – Section 3;
- Summarises the work undertaken to date to engage with key groups and members of the public – Section 4 and 5; and
- Explains how the project team intends to further engage with stakeholders and the public as the CAZ moves forward towards implementation – Sections 6.

2. Engagement aims and objectives

2.1 Overarching aims and objectives

B&NES recognise the value of engaging stakeholders and the public on the Clean Air Plan. This Engagement Strategy is therefore underpinned by two main objectives:

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

In this context, this Strategy incorporates a range of activities, which aim to: -

- Understand the concerns of audiences in relation to air quality and transport;
- Generate an understanding of the requirement for a Clean Air Plan and the benefits that this could bring;
- Educate key audiences about air quality and the health challenge;
- Counter any misleading or incorrect ideas about the problem;
- Describe the study process B&NES is undertaking;
- Explain what Clean Air Plan measures are available and effective;
- Understand the equality impacts for different groups of society from the proposed measures;
- Reach out to parts of society disproportionately affected and those who may not typically engage in the air quality and transport debate;
- Positively engage with people to demonstrate the value of their input and make clear what decisions can and cannot be influenced within the context of this project;
- Generate support or acceptance for the proposed Clean Air Plan measures;
- Improve the scheme by identifying mitigation measures or refining proposed implementation measures where possible; and
- Explain clearly the final package of measures and how this addresses concerns.

As the project moves through the various stages, the emphasis of the engagement activities will shift. Hence the following sections set out the specific aims of each future phase of engagement.

2.2 Risks

It is acknowledged there are significant risks associated with not engaging sufficiently and effectively with key stakeholders and the public:

- Insufficient engagement could result in poor understanding of the scheme, leading to opposition. This applies to members of the public and politicians, who influence each other. It is likely that some opposition to the scheme will exist regardless of the engagement process, but by undertaking a comprehensive engagement plan, there is the potential to alleviate the concerns of some opposition and generate a body of support.
- Should the Council's legal obligations not be met, there is a risk of judicial review, challenge from third parties, the possibility that a solution may be dictated to the Council and/or the possibility of financial penalties to be levied against the Council.
- There is a risk that more vocal stakeholders and residents are given disproportionate attention in comparison to others who provide inputs.

- There are also risks associated with undertaking engagement over an extended period, which could generate engagement fatigue, creating frustration among audiences who are not presented with any new information.

3. Stakeholder Analysis

At an early stage in the project an analysis of stakeholders was undertaken to help frame proposals for engagement. This section provides details of the key stakeholders identified to date and the role that they will likely play in the development of the Clean Air Plan.

3.1 Stakeholder identification

A stakeholder mapping workshop was held in February 2018 to identify stakeholders, their likely role and the methods and tools that could be used to engage with them. This process was used to enable effective division of resources and assist with the development of timescales required for effective engagement. As the project has progressed stakeholders have been added to this list and it continues to be a 'live' document.

Appendix A details the key identified stakeholders, their roles and interest in the project. The stakeholders are grouped into eight categories, as shown in Table 3.1:

Table 3.1. Identified stakeholder categories

Campaign groups	Other organisations / groups
Key businesses / business groups	Politicians and local government
Key demographics	Transport operators / projects
Key service providers	Transport user groups

3.2 Types of stakeholders

These stakeholder groups were then further segmented as follows, reflecting their overall likely role within the process:

- Decision makers – people or organisations charged with making the final decisions around the Clean Air Plan;
- Delivery partners – groups that will play a role in delivering the changes required by the Clean Air Plan (mainly transport operators);
- Engagement partners – groups that can help prepare and disseminate information and engage with residents and other groups; and
- Influencers – groups that will be engaged with either directly, or through engagement partners. Whether they support or oppose the proposals, they will have an influence on the decision makers.

These classifications have been used to help determine the appropriate nature and frequency of contact and the most suited engagement method for each stakeholder.

3.3 Key audiences

As the development of the Clean Air Plan has progressed, together with and supported by the evolving equalities impact assessment, the following groups have been identified as particularly affected and therefore these groups become key audiences for future communication and engagement about the proposals:

- Socio-economically disadvantaged groups
- Rural communities

- The elderly and the young
- Those people with disabilities;
- Different races;
- Different genders;
- Pregnant women and those on maternity;
- Religious/faith premises within the proposed CAZ;
- Residents living within the proposed CAZ;
- Residents living outside of the proposed CAZ;
- Small local businesses and traders;
- Other businesses;
- LGV drivers;
- Taxi drivers and operators;
- Bus operators; and
- HGV drivers.

In addition, the importance of communicating widely to ensure that everyone has an awareness of the proposals is acknowledged.

3.4 Tools and methods

A range of potential communication and engagement tools were identified at an early stage of the project. Many of these have been used through the SOC and OBC stages of engagement and will continue to be utilised to support the development of proposals, through to implementation.

3.4.1 Communications tools

The following tools were identified to support wide communications about the proposals and the air quality issues:

- Website – a bespoke website, www.bathnes.gov.uk/breathe, has been set up and is proving an effective mechanism for sharing information.
- Social media - social media platforms, including Facebook and Twitter;
- FAQs and subscription newsletters – as a means of publishing key facts about the Plan, including educational material on health and society impacts;
- Public relations and media briefings – regular communication updates and briefings by B&NES Press Office;
- Videos–visual material to explain the Plan, common questions and incorporate feedback from engagement exercises; and
- Advertisements – articles local newspapers; Facebook advertisements; notices on buses and at bus stops; and billboard displays.

3.4.2 Engagement tools

The following mechanisms were identified as potential tools to promote engagement, discussion and debate around the Clean Air Plan.

- Meetings – meetings held with key decision makers and stakeholders. Different formats used, including group and 1-to-1 meetings depending on audience;
- Briefing events – structured invitation-only events held with engagement and delivery partners, with a focus on a common theme;
- Drop in sessions – facilities for people to come in, obtain information and ask questions. Locations include supermarkets, retail centres, social clubs etc. – typically locations with high levels of footfall from a large cross section of society;
- Surgeries – bookable slots available for groups of up to three, to enable focussed discussion with members of the project team where requested. Run alongside drop in sessions where possible;
- Workshops – held with appropriate stakeholders to raise awareness, discuss problems, impacts and concerns, identify mitigation measures and discuss options;
- On-line questionnaires – use of on-line platforms for questionnaires and surveys, paper versions also made available;
- Links with existing projects – ensure opportunities taken to link the Plan with other projects being delivered or developed; and
- Pop up events – considered use of a range of public events and stunts to raise awareness, including ‘sofa on the street’ and competitions. Information stands at larger, relevant events including festivals.

4. Overview of engagement already undertaken – SOC stage

4.1 Strategic Outline Case

The SOC was published in March 2018. It considered a range of possible options for tackling air quality in Bath and concluded that the introduction of a Clean Air Zone (CAZ), with charges for non-compliant vehicles within the CAZ, was the only mechanism capable of delivering compliance with legal limits by 2021. A range of geographical scales were considered, and a small-scale CAZ was preferred.

The SOC set out three packages of measures for further consideration. The core element of each option was one of three types of CAZ charging schemes which were each combined with a series of non-charging measures:

- Class B: Charges for higher emission buses, coaches, private hire, taxis and heavy goods vehicles (HGVs);
- Class C: Charges as per Class B, plus higher-emission light goods vehicles (LGVs); and
- Class D: Charges as per Class C, plus higher-emission cars.

The CAZ types considered are in line with the Government's Clean Air Zone Framework.

4.1.1 Engagement format

During the development of the SOC, and in particular in the period following its publication, the Council facilitated a range of engagement events and activities to explain the process to the public and stakeholders to enable discussion on the short-listed options:

- Between February 2018 and the end of March 2018, early engagement focussed on building understanding of the current situation and the requirement to develop a Clean Air Plan.
- Following the publication of the SOC in April 2018, engagement focussed on continuing a conversation on air quality, and seeking feedback on the short-listed packages of measures identified.

This stage generated a wealth of feedback and this is reported in full in 674726.BR.42.FBC-24 SOC Engagement Report in Appendix O of the FBC. This section provides a brief overview of the key findings, for context.

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

4.2 Key messages

It is important to note that during this stage of engagement activity the parallel technical work was considering three shortlisted options and no preferred option had been identified. The key messages during this stage were:

- A Clean Air Charging Zone is coming to central Bath in the form of one of the three options;
- From 2020, charges will apply to high-emission vehicles driving in central Bath;
- Cleaner air will benefit everyone, it is advised people with diesel or older petrol vehicles find out more about how Bath's CAZ might affect them. Go to www.bathnes.gov.uk/breathe

- Air pollution from exhausts is linked to increases in asthma, allergies, heart and lung disease and cancer, with vulnerable people most likely to be affected
- Bath breaches the legal limits for NO₂ caused by vehicle emissions, so it's time to take action
- Play your part and help Bath BreATHe www.bathnes.gov.uk/cleanair4bathnes

4.3 Engagement undertaken

Full details of the engagement work undertaken in the SOC phase can be found in 674726.BR.42.FBC-24 SOC Engagement Report in Appendix O of the FBC.

The project team held 37 engagement events in total. 11 public engagement events at a variety of locations across Bath and North East Somerset and 26 events were held specifically for organisations within Bath and the wider area. Feedback was also recorded via a questionnaire (online and paper versions were provided), email correspondence and telephone conversations and comments made on the Council's social media.

4.4 Overview of feedback

After consideration of all the feedback received, the project team collated the following concluding messages from engagement work undertaken during the SOC phase. These are intended to provide an overview of the nature of the feedback received and highlight information which was felt to be relevant to the Council in taking forward proposals for the CAZ:

- There was a general and widespread recognition of the need to improve air quality in Bath. The quantitative analysis of the feedback form responses showed: 89% of respondents were aware that air pollution is a problem in Bath; 83% of respondents were concerned about air pollution in Bath; and 70% of respondents supported a charging zone in principle. The qualitative feedback also suggested that many respondents supported the principle of a CAZ and could identify a wide range of likely benefits.
- The qualitative analysis showed that relatively few respondents indicated a preference for a particular CAZ option, instead their comments focused on raising questions and identifying potential areas of concern. This reflects the early stage of engagement, and the fact that no specific scheme was put forward for comment. Some respondents did not feel a CAZ was necessary whereas others felt a CAZ did not go far enough.
- The feedback suggested some misunderstanding of where air quality improvements would be seen after CAZ implementation and highlighted the need to better explain that the positive impacts of a CAZ are not just felt within the zone.
- There was some concern among respondents regarding the possible impacts of a CAZ to the more vulnerable groups of society, including low income households, the elderly, and local tradesmen and businesses. A variety of methods were suggested to mitigate these impacts.
- Potential difficulties initiating and maintaining long-term behaviour change was noted by some respondents to be a concern. This was mainly in relation to reducing air pollution and the effective operation of a CAZ. Respondents suggested incentive provision and inclusion of more "carrots" to support the necessary behaviour changes.
- Many respondents requested public transport improvements and the need to provide better and more attractive alternatives to car travel in Bath. This is supported by the quantitative feedback showing that the other measure to "*Implement public transport route improvements*" was supported by 75% of respondents. The feedback shows that respondents would like air quality improvements to happen alongside measures to reduce congestion and improve flow, which is outside the scope of the project.
- Parking charges were a concern for some respondents who commented on the impact to local business of increased parking charges alongside the implementation of a CAZ. There were requests for a more holistic approach to these policy areas.

- The feedback demonstrates that design details are an area of interest to many respondents, with several requests for further information about the charging system and financial processes of the Clean Air Plan.
- The CAZ boundary was an area of concern for respondents, who suggested numerous changes/alterations. This was coupled with concerns over the diversionary impacts of the CAZ boundary and the potential associated air quality and congestion impacts for areas outside of the zone.
- Detailed and specific technical queries were received from some respondents, with some questioning the validity of the technical assessment of options and others seeking to better understand these processes.
- There were also many comments recommending improvements to existing infrastructure and highlighting areas where infrastructure improvements are required. These suggestions cannot be delivered within the Project timescales or extend beyond the scope of the project.
- Respondents were generally positive about the engagement process to date. Some suggested amendments to the engagement materials and event format to be considered in the upcoming engagement work.

4.5 Lessons learnt

This engagement period has highlighted areas in the engagement efforts that require attention moving forwards to make it more effective.

- It is noted that during this next phase of engagement further attention will be directed to recording the profile of respondents to improve our understanding of diversity and broaden the reach of the engagement.
- It is recognised that there is a need to expand engagement efforts to generate additional feedback from some of the key stakeholders identified in section 3.3, including LGV and HGV drivers/operators, low income households and local retailers and other small businesses.

5. Overview of engagement already undertaken – OBC stage

The draft OBC, developed between April and October 2018, focused on assessing the three options shortlisted in the SOC to identify the option most likely to achieve compliance by 2021. It identified a Class D CAZ as the preferred option and set out a wide range of technical information which included consideration of the need for the intervention, financial and management issues and how the CAZ would be delivered.

Preferred option published in draft OBC in October 2018 and used as a basis for formal consultation:

- Introduction of a Class D Charging CAZ (including a charge for higher emission cars);
- A charge of £9 per day (once every 24-hr period) for higher emission cars, light good vehicles, private hire vehicles and taxis;
- A charge of £100 per day (once every 24-hr period) for buses, coaches and HGVs;
- Euro 4 petrol vehicles (from approximately 2006), Euro 6 diesel vehicles (from approximately 2015), electric and hydrogen fuel cell vehicles would not be charged;
- Government exemptions including vehicles within the disabled passenger vehicle tax class and historic vehicles; and
- Local concessions and mitigations to help vulnerable groups and businesses.

The draft OBC, setting out proposals for a Class D CAZ, formed the basis of a formal, six-week consultation with the general public and stakeholders. This ran from 16th October to 26th November 2018. This process was used to help understand how the Class D preferred option may affect different groups and will guide the Council in formulating their next steps.

5.1 Engagement aims and objectives

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

- B&NES is mandated by central Government to take action on air quality and to bring concentrations of NO₂ to below 40 µg/m³ as an annual mean in the shortest possible time and by 2021 at the latest.
- The Council may face potential fines or legal action if they do not put into place a package of measures to address air quality within this time frame.
- Technical work undertaken prior to the start of the consultation process showed that a charging CAZ is the only mechanism capable of reducing emissions to appropriate levels within the required timescale. Based on this evidence, a Class D CAZ was identified as the option most likely to achieve compliance.
- A CAZ would need to be implemented in line with the principles set out in the Government's 'Clean Air Zone Framework'. This document, published in 2017, explains the approach that Local Authorities should take when introducing a zone.
- Funding for a CAZ is dependent upon the Government's Joint Air Quality Unit (JAQU) approving a Full Business (FBC) Case. There are also strict rules on how the funding available can be spent.
- The final decision on the type of charging zone and the detail of this will be made by elected Cabinet Members, taking account of feedback from JAQU.

Notwithstanding these issues the OBC phase consultation provided an opportunity for people to express support or raise their concerns, and for these issues to be considered by the Council. A key objective was to highlight any significant concerns that could, if not resolved at this stage of the process, trigger the need for a public inquiry at a later stage. Ultimately this stage was an opportunity for discussion between the Council and

any persons concerned about the proposals or their impacts, and an opportunity for sharing of information and ideas about how these issues could potentially be resolved.

In this context, the specific objectives for communication and engagement during the OBC stage were to:

- Communicate the preferred Class D option to the public and key stakeholders;
- Encourage engagement on the preferred option and support all drivers in Bath with understanding the scheme and answering any questions;
- Build on the success of initial phase of engagement and to widen awareness of plans for a CAZ;
- To build support for a decision on a CAZ, ensure that the need for it and legal requirements imposed on the Council are understood;
- Ensure continued engagement with vulnerable, hard to reach groups and gather feedback to inform future communications;
- Encourage people who already support the scheme to help spread the word;
- Support Cabinet Members to explain the benefits and the need for a CAZ to other stakeholders and political groups;
- Continue to engage with, and find ways to support, the key stakeholders identified in section 3.3, including LGV and HGV drivers/operators, low income households and local retailers and other small businesses; and
- Ensure that everyone is aware of the next steps and timeline i.e. when a final decision will be made, when it will be implemented etc.

5.2 Key messages

The key messages during the draft OBC phase and in the context of the preferred Class D option were:

- In late 2020 the Council proposes to introduce a Clean Air Zone in Bath city centre in which higher-emission vehicles will be charged daily to drive in the city centre. It will cost £9 for smaller vehicles and £100 for larger vehicles;
- If you already have a compliant vehicle or plan to change to one before the proposed Clean Air Zone is introduced it would not cost you any more to drive in and around Bath;
- The Council recognises that certain groups may need some support. The proposals include automatic exemptions, local concessions for vulnerable groups, financial assistance to help some people upgrade vehicles, and grace periods, as well as a package of measures to help people get around;
- All higher-emission vehicles would be included because our technical modelling suggests this is the only option capable of will reducing harmful levels of NO₂ within the Government's 2021 target;
- Emissions must be reduced by 2021 to meet Government targets and to protect people's health in Bath;
- A high level of NO₂ makes heart and lung conditions worse. 12,000 people in Bath and North East Somerset suffer from asthma, and exposure to NO₂ can trigger attacks. Over the longer term it contributes to reduced lung development in children and is linked to increased possibility of heart attacks and dementia.
- While only some people would be charged, everyone would benefit from cleaner air;
- Proposed zone charges are not being introduced to raise revenue – they have been set at a level to discourage highly-polluting vehicles from driving into Bath;
- The proposed zone is restricted to the centre of Bath, but cleaner air will be felt across the city and B&NES;
- Face-to-face support and advice is being offered to residents through drop-ins/public surgeries dates/times can be found on the website;

- The Council is working closely with bus operators, taxis operators and drivers, business groups; and
- A final decision will be made by elected Cabinet Members, taking on board feedback from the public.

5.3 Engagement approach

During the OBC stage, two parallel streams of engagement and communications work were:

- 1) A formal consultation period on the proposed Class D CAZ, during which the OBC (and non-technical summaries of key information) were published and there was a 6-week period for comments.
- 2) A process of ongoing publicity for the Clean Air Plan and, in particular, awareness raising around the overall impacts of poor air quality in the City, in particular on health.

5.3.1 Formal consultation

Following publication of the draft OBC the Council facilitated a formal consultation. Information was shared via various means, and comments on the preferred option were invited for a period of six weeks. Full details of the formal consultation process are set out in OBC 25 – Report on Formal Consultation.

The following were made available to explain the preferred option:

- The draft OBC documentation was made publicly available, in full, on the project website;
- A non-technical summary of the OBC was made available on the project website and also in One Stop Shops and libraries;
- Information was added to the website, including a series of FAQs; and
- Short video clips were produced to explain the preferred option to use on digital and social media platforms.

Opportunities for members of the public and stakeholders to find out more and speak to the project team were provided via:

- A series of drop in events, open to all;
- A series of ‘surgery’ events, offering pre-booked appointments for one-to-one discussions; and
- Presentations to and discussions with stakeholder groups.

Table 5.1 provides further details.

Table 5.1 – Engagement with key groups during formal consultation period

Group	Mechanisms for engagement
Residents	Postcards sent to each household in B&NES. The consultation was promoted via media (television, newspapers etc) Posters in libraries and One Stop Shops Drop in sessions and bookable surgery slots.
Small businesses and traders	Postcards sent to each business in B&NES. Communications with group forums with targeted information included in subscription newsletters where possible. Surgery sessions and meetings (where required).
LGV drivers	Drop in sessions and bookable surgery slots.

Group	Mechanisms for engagement
	Communications with group forums with targeted information included in newsletters for example in the National Couriers and Dispatch Association.
HGV drivers	Drop in sessions and bookable surgery slots and meetings. Communications with Road Haulage Association.
Taxi operators	Ongoing discussions to continue through Taxi Forum.
Groups supporting the interests of the elderly, the young, those with disabilities, those who are socio-economically disadvantaged, black and ethnic minority groups, pregnancy and maternity groups, rural communities and religious groups	Met with Independent Equalities Advisory Group to gather feedback and advice on how best to inform and support disadvantaged/hard to reach groups. Used members of this Group to have more focussed conversations with target groups e.g. Black and Ethnic Minority Senior Citizen Association, Bath Christian Partnership, Action on Hearing Loss

The consultation was advertised widely to all via:

- Postcards with key info for distribution to all households or to pick up in key places/take away from events;
- Emails to stakeholders who have previously provided their contact details to the project team;
- Social media
- Press releases – resulting in newspaper, radio and television promotion;
- Newsletters;
- Posters in libraries and one stop shops

Comments were collated via:

- Questionnaires. Two versions were provided, one for individuals/groups and another for businesses. These were mainly completed online (although paper versions were also available);
- Letters; and
- Emails.

5.3.2 Wider publicity

To raise the profile of the Clean Air Plan development, and of the engagement process on the preferred option, the following publicity mechanisms were also used:

- Prior to the consultation, a health campaign focusing on the impact of air pollution ran for 6 weeks. This included posters, a social media campaign, and campaign posters on buses and at bus stops around the city.
- Concise information sheets (health facts, FAQs etc) for Cabinet Members and key influencers.
- Further meetings with key influencers.
- Further meetings with the Independent Equalities Group to gather feedback and advice on how best to inform and support disadvantaged/hard to reach groups e.g. elderly, young people, people with physical and mental health difficulties, poorer communities and rural communities. This has informed the impact assessment and future communications work.
- Meetings with the leader, Cabinet Members and senior management team to inform them of developments and mitigate any potential issues.
- Continued work with other services to prepare/share/better communicate how CAZ impacts can be mitigated.

5.4 Overview of feedback received

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

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

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

Following the analysis of consultation feedback additional technical work was undertaken to address the main comments raised. This included work to examine an additional Class C CAZ option and further consideration of measures that could be delivered alongside a Class D CAZ to reinforce the effectiveness of the zone and

support residents and businesses to adapt. This work is reported in FBC 25a – OBC Consultation Response Report.

5.5 Next steps

The outcome of the formal consultation, results from ongoing technical work, and additional work undertaken in response to feedback (such as adjusting boundaries) were considered by elected Cabinet Members and informed the Cabinet's decision to implement the Class C option in March 2019 with the addition of traffic management measures at Queen Square to help meet the government's strict air quality targets in the timeframe available.

6. Overview of engagement already undertaken – FBC stage

The FBC is the current phase of the project. It is not anticipated that significant alterations will be made to the scheme that was approved by the Cabinet in March 2019 during this stage but its details will continue to evolve based on ongoing technical work and continued feedback from stakeholders. This stage of work will:

- Take forward the final scheme, as decided by B&NES Cabinet Members;
- Finalise the proposals and set out detailed issues around the implementation and operation of the Scheme;
- Focus on the procurement of the scheme to finalise scheme costs and programme; and
- Importantly, during the FBC stage the ‘Order’ required to legally designate the charging zone will be promoted, sealed and ‘made’.

The main method of engagement during this stage was:

- **Consultation on the detail of the Final Scheme and Charging Order** – to explain how the Scheme has changed since the previous consultation on the draft OBC and to promote and invite feedback on the Charging Order. The consultation will provide an opportunity for stakeholders to comment on the detail of the final scheme, including amends to the boundary, the details of the Class C Charging CAZ, the proposals for traffic management at Queen Square and the package of supporting measures/revenue reinvestment fund. Comments were invited for a period of four weeks from 23rd September 2019 until 20th October 2019.

6.1 Consultation aims and key messages

The focus of the consultation was on:

- Continuing to raise awareness and feedback on the approved Scheme and the draft Charging Order. This included inviting comment on cabinet’s decision to approve a Class C CAZ rather than a Class D, the proposals for Queen Square, and the details of the approved Scheme including boundary amends, mitigations, concessions and exemptions.
- Continuing to raise awareness of the wider air quality issue and the need for action;
- Helping people to get compliant in cost-effective ways, find alternative ways to travel around Bath, change their travel habits and understand the important role that everyone can play in tackling air pollution;
- Preparing and supporting people and businesses for the implementation of the zone; and
- Ensuring that the statutory processes related to the promotion of the Order (and the associated ability for people to comment on this) are adhered to.

6.2 Engagement approach, tools and methods

The following was made available to support the consultation:

- A non-technical summary of the Legal Charging Order and detail of the final scheme. This highlights where the scheme has changed since the formal consultation at OBC stage. Documentation was made publicly available on the project website; printed copies were available at consultation events and in One Stop Shops and libraries and dropped at units in trading estates etc.;
- Information added to the website, including a series of FAQs.

Opportunities for members of the public and stakeholders to find out more and speak to the project team were provided via:

- A series of drop in events, open to all interested stakeholders, in different locations around Bath to reach residents and businesses located within and near to the edge of the boundary, and specifically those in areas where the boundary has been adjusted. The locations of the drop ins are in the following wards:
 - Bathampton;
 - Larkhall;
 - Twerton;
 - Bathwick;
 - Weston; and
 - The City Centre.
- A series of meetings and events with bus and coach operators, community transport providers, HGV/LGV owners and drivers and taxi/PHV owners and drivers.

The consultation was advertised via:

- Postcards to every home and business in B&NES and in surrounding authorities
- Press releases resulting in newspaper articles, radio and television coverage;
- Social media posts and
- Subscription newsletters.

Comments were collated via:

- A questionnaire. Both electronic and paper versions were available during the four-week consultation period.
- Letters; and
- Emails.

6.3 Overview of feedback received

Overall, respondents showed an understanding of the need to address air quality in Bath, with frequent reference to the government declared climate emergency.

Respondents commented on many aspects of the proposed scheme details. The main themes from the feedback were:

- Opinions on the **Change from a Class D CAZ to a Class C CAZ** were mixed. Respondents understood the justification for the change and agreed with it, in particular recognising that a Class C CAZ would have less detrimental impact on low income groups. However, some were keen to see bolder action and felt that a Class C CAZ would not have the desired effect of sufficiently improving the air quality within Bath.
- Respondents gave opinions on the **boundary**. **Overall, the amendments made to the boundary following the autumn 2018 consultation were welcomed. However, some respondents felt that further changes were required** with key suggestions highlighting the need for a wider CAZ in order to incorporate and safeguard residential areas. The perceived need to include Sydney Buildings was frequently mentioned.
- Opinions on the **Queen Square traffic management proposals** were mixed. Some respondents suggested that this was a step in the right direction and some felt that the measures could go further, for example that the Square should be pedestrianised completely or the measures should be a permanent feature. Others expressed concern that the proposed measures would increase congestion within the area and result in more traffic using neighbouring residential streets and therefore increase emissions in these areas.

- Respondents highlighted that improving **alternative modes of transport**, including public transport, walking and cycling should be a key focus both in conjunction to the CAZ and as an alternative method of reducing emissions. There was particular concern that the Class C CAZ charges would mean that bus companies would pass costs to the customer which could deter them from use.
- Concern for the **city of Bath** including its residents and business. Concerns were raised over the movement of pollution into residential areas as vehicles try to avoid the CAZ, with specific mention of 'rat runs'. Concerns for business were also raised due to the impact that the Class C CAZ would have on the cost of deliveries (especially for the smaller traders) and for trades people / the self-employed whose livelihoods depend on the use of certain (often heavy) tools or equipment.
- Respondents made suggestions on **boundary infrastructure** including comments or suggestions on the placement of street signage and cameras. Queries were raised on the implementation and practicality of associated infrastructure.
- Opinions on the **support packages and reinvestment of revenue** were mixed. Respondents expressed support for those incentives or reinvestments that included requests for improvements to the public transport, walking or cycling experience (including tackling the school run), park & ride sites and increased provision of electric charging points. Respondents showed less support for initiatives associated with deliveries, particularly incentives for van drivers to use the park & ride sites.
- There was a general consensus in support of any scheme that tackles air quality, but some feeling that **more should be done** to combat emissions in Bath.
- There were a number of **suggestions for alternatives to the proposed scheme**, these included: building a ring road, improvements to traffic management and traffic calming measures within the city and a Park & Ride to the east of the city.

7. Engagement plan – Implementation and Operation

Engagement phases remaining are:

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

7.1 Engagement aims and objectives

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

- Continuing to raise awareness of the Scheme taken forward, especially among those affected by charges (commercial vehicle and van owners) who may need support to upgrade vehicles.
- Keeping residents abreast of work to install cameras and signs that may impact on their street, with support for queries/concerns.
- Ensure that everyone knows that private cars and motorbikes will not be charged.
- Continuing to raise awareness of the wider air quality issue and the need for action.
- Encouraging all drivers – including car drivers who are not being charged - to consider getting compliant or to change their travel habits and promote the fact that everyone has an important role to play in tackling air pollution.
- Preparing and supporting people and businesses for the implementation of the zone.
- Ensuring the statutory processes related to the promotion of the Order (and the associated ability for people to comment on this) are adhered to.
- Facilitating research that into the most effective ways to influence behaviour change through engagement and apply these throughout the engagement process.
- Collecting and sharing of data to promote the engagement work and demonstrate progress and air quality improvements as a result of the work being done.

7.2 Key messages and engagement themes

Implementation and Operation Phases will focus on:

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

There will also be a need to raise awareness of CAZ infrastructure placement and construction start dates for those directly impacted, such as those people living or working adjacent to cameras, signs etc.

A key theme that will continue to run through all remaining engagement will be health messages.

7.3 Engagement approach, tools and methods

Publicity and communications around the health messages will continue during all future engagement, to include business to business telemarketing, e-newsletters, information leaflets hosted at trade counters, radio

advertising, a social media campaign and further direct mail (e.g. postcard or targeted letters to non-compliant vehicle owners using data gathered from cameras during the soft launch. Messaging will also include raising awareness of implementation dates and the available channels of support and information from the Council. Our local work will be supported by national CAZ campaign covering Bristol, Bath, Swindon area.

The community liaison team will provide a central point of contact to local communities. They will be responsible for notifying residents about proposed works and engaging with them to address any concerns during the implementation phase of the CAP.

Travel Advisors will ensure businesses and individuals are aware of the Scheme implementation, promote and facilitate uptake and usage of the mitigation measures and use the mechanisms listed below to provide advice on issues such as:

- Checking whether or not a specific vehicle would be eligible for a charge;
- Vehicle purchase; and
- Alternative modes.

In addition, Travel Advisors will also actively seek to engage with residents/community groups to positively promote the CAZ and mitigation measures or other services, to support transport modal shift towards more sustainable modes of transport and travel. The Travel Advisors will actively seek to promote local businesses and groups that make changes through their e-newsletters.

During the implementation phase of the project the engagement activities will be targeted towards groups who need support in the transition and focus on more detailed aspects of the proposed Scheme including the positioning of cameras and signage and the traffic management system at Queen Square. As such, it is anticipated that the **key mechanisms** will be:

- Business to business telemarketing
- Face to face meetings, as appropriate, with key stakeholders;
- Drop in sessions and/or surgery sessions to provide opportunities for members of the public and other interested parties to discuss queries and concerns;
- Regular updates to the Bath BreATHes website to include a regular bulletin listing upcoming road works across Bath;
- An email address for members of the public and businesses to contact the Council about works taking place;
- A public helpline, Council Connect, will receive queries and return them to the relevant teams for action and
- Liaison with other Council departments to promote sustainable transport and travel initiatives
- Regular e-newsletters to support health messaging, air quality data, a countdown to switch on and local case studies of some of the changes being made.

7.4 Key audiences

As the development of the Clean Air Plan has progressed, together with and supported by the evolving equalities impact assessment, the following groups have been identified as particularly affected and therefore these groups become key audiences for future communication and engagement about the proposals:

- Socio-economically disadvantaged groups;
- Rural communities;
- The elderly and the young;
- Those people with disabilities;
- Different races;
- Different genders;
- Pregnant women and those on maternity;

- Religious/faith premises within the proposed CAZ;
- Residents living within the proposed CAZ;
- Residents living outside of the proposed CAZ;
- Small local businesses and traders;
- Other businesses;
- LGV drivers;
- Taxi drivers and operators;
- Bus operators; and
- HGV drivers.
- Charities based/operating in the CAZ

It will be important to maintain the relationships and communication channels established with key stakeholders throughout the engagement on the Scheme to date. This will enable continued effective communication with these important groups and help to resolve potential issues as needed. In addition, the importance of communicating widely to ensure that everyone is aware of the proposals is acknowledged.

However, some stakeholders will be more greatly impacted by the implementation of the proposed Scheme and will therefore require more targeted engagement. The table below shows the groups identified as target audiences for communication and engagement during the next phases of the Clean Air Plan.

Table 7-1 Engagement methods for target audiences

Target Audience	Method of Engagement
Bus and Coach operators	<ul style="list-style-type: none"> • Ongoing face to face meetings as appropriate.
Taxi and Private Hire Vehicle drivers	<ul style="list-style-type: none"> • Targeted events as required. • Ongoing engagement as appropriate.
Community Transport providers and charities using minibuses	<ul style="list-style-type: none"> • Ongoing engagement as appropriate.
Local businesses/schools etc. using non-compliant LGV and HGVs – including self-employed tradespeople and smaller businesses	<ul style="list-style-type: none"> • Ongoing engagement as appropriate. • Travel advisors will raise awareness of CAZ implementation, facilitate the use and uptake of mitigation schemes and provide advice as needed.
LGVs and HGVs using Bath as a through route, working in Bath or delivering within Bath	<ul style="list-style-type: none"> • Ongoing engagement as appropriate. • Travel advisors will raise awareness of CAZ implementation, facilitate the use and uptake of mitigation schemes and provide advice as needed.
Residents adjacent and close to the proposed camera and signage locations	<ul style="list-style-type: none"> • Ongoing engagement as appropriate. • Community liaison officers to ensure residents are notified and have opportunity to discuss concerns.

See Appendix B and Appendix C for further details on the proposed future engagement and communications for the implementation phase of the CAP.

Appendix A. Stakeholder List

Stakeholder	Category	Role
Access Forum	Transport user groups	Influencer
Age UK etc	Other organisations/groups	Influencer
B&NES households	Key Demographics	Influencer
B&NES Cabinet	Politicians/local govt	Decision Maker
B&NES councillors	Politicians/local govt	Influencer
B&NES fleet	Transport operators/projects	Delivery partner
Bath Alliance for Transport and Public Realm	Campaign groups	Influencer
Bath Bridge	Campaign groups	Engagement Partners
Bath Bus Users Group	Transport user groups	Influencer
Bath Business Improvement District	Key businesses/ business groups	Engagement Partners
Bath Chamber of Commerce	Key businesses/ business groups	Influencer
Bath Chronicle	Other organisations/groups	Influencer
Bath City Centre Action Group	Campaign groups	Engagement Partners
Bath City FC	Other organisations/groups	Influencer
Bath City Forum	Politicians/local govt	Influencer
Bath Cricket Club	Other organisations/groups	Influencer
Bath Deserves Better	Campaign groups	Influencer
Bath Hacked	Other organisations/groups	Engagement Partners
Bath Living Streets	Transport user groups	Influencer
Bath Meadows Alliance	Campaign groups	Influencer
Bath Preservation Trust	Campaign groups	Influencer
Bath Rugby	Other organisations/groups	Influencer
Bath Taxi Association	Transport operators/projects	Influencer
Bath Tourism Plus	Key businesses/ business groups	Influencer
Bath Trams	Campaign groups	Influencer
Bristol City Council	Politicians/local govt	Influencer
Bike Bath	Transport operators/projects	Delivery partner
Car driver	Key Demographics	Influencer
Churches	Other organisations/groups	Influencer
Client Earth	Campaign groups	Decision Maker
Clinical Commissioners Group	Key service providers	Influencer
Community Transport Association	Transport operators/projects	Influencer

Stakeholder	Category	Role
Confederation of Passenger Transport	Transport operators/projects	Influencer
CT&E policy development and scrutiny panel	Politicians/local govt	Influencer
Cycle Bath	Transport user groups	Influencer
Defra/DfT/SoS	Politicians/local govt	Decision Maker
Disability / access groups	Key Demographics	Influencer
Disabled Motoring UK	Transport user groups	Influencer
Environmental Sustainability Partnership	Politicians/local govt	Influencer
Faresaver	Transport operators/projects	Delivery partner
Federation of Bath Residents Associations	Campaign groups	Engagement Partners
Federation of Small Builders	Key businesses/ business groups	Influencer
Federation of master builders	Key businesses/ business groups	Influencer
First Bristol, Bath & West Bus Group	Transport operators/projects	Delivery partner
Freight Transport Association	Key businesses/ business groups	Engagement Partners
Friends of the Earth	Campaign groups	Engagement Partners
GPs	Key service providers	Engagement Partners
Great Western Railway	Transport operators/projects	Delivery partner
Greenpeace	Campaign groups	Engagement Partners
Health and fitness clubs	Key businesses/ business groups	Engagement Partners
Highways England	Transport operators/projects	Influencer
Hospital patients	Key Demographics	Influencer
Independent Shops of Bath	Key businesses/ business groups	Influencer
LGV drivers	Key Demographics	Delivery partner
LGV/Delivery/Courier Firms	Key businesses/ business groups	Influencer
London Road and Snow Hill Partnership	Campaign groups	Engagement Partners
Low income households	Key Demographics	Influencer
Marlborough Lane and Buildings Residents Association	Campaign groups	Engagement Partners
Media	Other organisations/groups	Influencer
Member of Parliament	Politicians/local govt	Influencer
National Association of Wedding Car Professionals	Other organisations/groups	Influencer
Somerset Council	Politicians/local govt	Influencer
Network Rail	Transport operators/projects	Influencer

Stakeholder	Category	Role
NUS	Other organisations/groups	Influencer
Other bus operators	Transport operators/projects	Delivery partner
Parents	Key Demographics	Influencer
Parish councils	Politicians/local govt	Influencer
Public Health England	Key service providers	Engagement Partners
Regular commuters	Key Demographics	Influencer
Residents	Key Demographics	Influencer
Residents Associations	Campaign groups	Engagement Partners
Road Haulage Association	Key businesses/ business groups	Engagement Partners
Royal Mail	Key businesses/ business groups	Engagement Partners
Royal United Hospitals Bath	Key service providers	Influencer
Schools, Universities and Colleges	Key service providers	Engagement Partners
Self-employed taxi drivers	Key Demographics	Delivery partner
SMEs	Key Demographics	Influencer
South Gloucestershire Council	Politicians/local govt	Influencer
Southgate Bath	Other organisations/groups	Influencer
Students and young people	Key Demographics	Influencer
Sustrans	Transport user groups	Engagement Partners
Taxi Drivers Forum	Transport operators/projects	Influencer
Taxi operators	Transport operators/projects	Delivery partner
Tourists/visitors	Key Demographics	Influencer
Transition Bath	Campaign groups	Engagement Partners
Transition Larkhall	Campaign groups	Engagement Partners
Uber	Transport operators/projects	Delivery partner
Unemployed	Key Demographics	Influencer
WECA	Politicians/local govt	Decision Maker
Wessex	Transport operators/projects	Delivery partner
Widcombe Residents Association	Campaign groups	Engagement Partners
Wiltshire Council	Politicians/local govt	Influencer
World Heritage Site Steering Group	Other organisations/groups	Engagement Partners

Appendix B. Community Liaison Communication And Engagement Approach

Communications and Engagement Strategy & Action Plan

Bath Clean Air Zone Implementation - November 2019 to November 2020

I. Project Overview

On 5 March 2019, the council's cabinet approved a final outline business case for a Clean Air Plan for Bath including a class C clean air zone that will charge all higher emission vehicles (excluding cars) to drive in the city centre from the end of 2020. For the scheme to comply, it also requires traffic management at Queen Square.

In addition, the cabinet approved a wide range of supporting measures designed to lessen the impact of the zone on the community and encourage a shift to sustainable transport.

For full background information on the strategic and outline business cases, and why we need a zone, go to www.bathnes.gov.uk/breathe. The full business case will also be available from January 2020.

II. Communications overview

From September 2019, the role of community liaison was introduced, developing and delivering communications and engagement activity to support the operational work of implementing the CAZ. This operational work includes the placement of signs and cameras on the boundary and the traffic management interventions outlined in the final outline business case.

The community liaison approach will be aligned with the overarching communications for the programme and will involve working closely with the B&NES highways team to ensure all opportunities are used to raise awareness with impacted residents, local businesses and road users.

The role of the community liaison team will also involve receiving and managing the responses to queries and concerns received as a result of the works taking place.

A clear programme of works will be published on the Bath Breathes website, along with contact details for the community liaison team as it becomes available.

From January 2020 works will begin to install signage and automatic number plate recognition (ANPR) cameras around the boundary of the zone for the launch date in late 2020. This will involve updating cables and networks and will include installing traffic management systems within Bath to manage the air quality in congested areas such as Queen Square.

This document aims to outline the communications and engagement approach that will support these works to ensure those affected are informed and aware of how the work will impact them, as well as providing the opportunity for people who live and work in Bath to feedback and contact us.

III. Key communications objectives for community liaison

Communication Objective	How it will be achieved
To make information easy to find	<p>Ensure resources such as the Bath Breathes webpages are fully updated.</p> <p>Notify affected residents, local businesses and visitors to Bath of installation works taking place and their impact on access to the area including what is happening, when and how.</p>
Maintain an honest and open approach to all communication	<p>Building on the engagement work done during the development of the business case, provide and promote mechanisms for members of the public to submit their concerns and questions directly to the project team, via the community liaison officers.</p> <p>Officers will respond promptly with every effort to answer any questions asked in an honest and open way.</p>
Deliver inclusive communication	<p>Deliver proactive communications to affected residents, local businesses and visitors to Bath in advance of works commencing as aligned with the works schedule. Distributing all communications through multiple channels to ensure communication is inclusive.</p>

	Provide multiple mechanisms for members of the public to contact us with questions and concerns they may have.
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IV. Key messages

The UK has legislation in place to ensure certain standards of air quality are met. In 2017, the government directed the Council to reduce levels of nitrogen dioxide in the city in the shortest possible time. Introducing a Clean Air Zone in late 2020 will enable Bath to achieve these objectives.

From January 2020, works will take place across Bath to install and update equipment to enable the Clean Air Zone to operate.

In most cases, this work will take place around the boundary of the zone, however there will be some work in the city centre, including the installation of additional traffic signals at Queen Square.

We will aim to keep disruption to a minimum.

We will let you know when we will be working in your area.

We will make ourselves available so you can talk to us.

We will consider access for pedestrians, including wheelchair and pushchair needs, and cyclists as well as utilities such as refuse collections, delivery services and emergency vehicles.

V. Target audiences

Residents

- a. Residents inside the zone and on the periphery of the zone – re: the impact of the zone boundary, camera placement, infrastructure work, potential rat-running and parking issues
- b. Residents inside and outside the zone running small businesses
- c. Residents groups

Local Business

- d. Local businesses based in areas where work is taking place
- e. Businesses across Bath who may be impacted by any construction work taking place

Visitors/Tourists

- f. Tourist board
- g. Transport companies including bus companies

Internal

- h. Internal stakeholders
- i. Travel advisor team
- j. Council Connect
- k. Communications and press teams
- l. Project team
- m. Cabinet members and administration

- n. Contractors delivering the works

VI. Collateral and channels

Having identified the impacted groups to communicate information to about the planned works, the following table identifies available and appropriate channels to ensure communication is inclusive, accessible and effective. In addition, it identifies the collateral most appropriate to deliver community communications for the CAZ construction works:

Channel/Collateral	Description	Date for distribution	Owner/responsible
Press releases	Information for local media to inform the local public and businesses	In line with significant works and events, as required	JF/JW
Letter to residents	A letter informing residents of the planned work in their street/area	To be distributed two weeks ahead of planned works	Community liaison/JR
Camera view images	Provide images on the website from the cameras to reassure residents their privacy will not be invaded	Jan 2020	SC/CC
Images and Graphics	Provided by the overall communications to explain the CAZ – will be used as reference for the community liaison officers	Ongoing	JF

Map	Queen Square map and traffic flow with dates of work to help residents and road users view the work	Ongoing	Jacobs/CC
Social Media	Provide updates for the highways and communication team twitter feeds	Updates provided every two weeks	JF/CC/JR
Feedback form	A form which captures the query or concern of an individual who calls the Council Connect number, or the travel advisor team	Passed to community liaison team when queries are received	CC
CAZ_info@bathnes.gov.uk	Email address for members of the public and businesses to contact us about works taking place	To be checked regularly and responses sent to emails within two days	CC
Website (Breathe)	Regularly updated public facing website with all information and news on the CAZ	Regularly updated and reviewed as programme moves forward. Updates on upcoming works to be published at least two weeks before work begins where possible	JF
Roadworks bulletin	Regular bulletin listing upcoming road works across Bath – managed and issued by the B&NES Highways team	Two-weekly	JR

Council Connect	Public helpline – will receive queries and pass them to the CAZ construction team via the community liaison and communications teams	Ongoing	Council connect
Face to face events	Regular opportunities for members of the public to speak to someone in person will be arranged. This might include regular drop in sessions, or scheduled sessions at a one-stop shop for CAZ	Regular drop in sessions	JF/CC

VII. Communication approach

Messages will be aligned with the messaging of the wider Bath CAZ programme ensuring all internal stakeholders, including Council Connect, the project team, communications and press team and travel advisor team are informed about activity delivered by the community liaison team.

Communication will be tailored to reflect the expected level of disruption to road users and pedestrian expected from that work.

To support the proactive information-giving communication required to support the construction work, three packages of communications are listed below. An assessment of each planned works will identify which package of communication will be allocated to it and the planning will be calculated accordingly. The judgment will be made by considering the impact to road users, pedestrians and local businesses and residents:

<p>Small</p>	<p>Non-disruptive work which does not involve any obstruction to the footway, highway or the use of large machinery.</p>	<ul style="list-style-type: none"> • A notice in the local area to inform people of what is happening, when and where to go for more information • An update on the highways team Twitter feed • Update on the Bath Breathes website
<p>Medium</p>	<p>Disruption is minimal, but might include narrowing of the footway, or bringing in small cranes and lifts etc.</p>	<ul style="list-style-type: none"> • A notice in the local area to inform people of what is happening, when and where to go for more information • An update on the highways team Twitter feed • Update on the Bath Breathes website • Letter drop to those houses in the immediate vicinity of the works (within a 15 metre radius)
<p>Large</p>	<p>Disruption will impact access to the road/street. This might mean the footway is diverted on to the road, there might be temporary traffic lights, or the need for large and/or noisy machinery.</p>	<p>A notice in the local area to inform people of what is happening, when and where to go for more information</p> <p>An update on the highways team Twitter feed</p> <p>Update on the Bath Breathes website</p> <p>Letter drop to all residents in the street or road where the work is due to take place along with any link roads</p> <p>Notify local schools, community venues and businesses of the works taking place</p>

		Press releases will be issued where there is wider impact from the works planned e.g. such as the works planned for Queen Square
Reactive	When members of the public/residents/road users etc. contact the email address or Council Connect with a query or concern regarding the works	Email – this will be monitored by the community liaison team Council Connect – will receive the information, recording the details of the call in a prepared form, and forward it on to the email address monitored by the community liaison team. Feedback will be recorded and FAQs will be developed for any new issues not yet answered and incorporated into the overall Bath CAZ FAQs.

VIII. Sign off and Governance

The table below presents the sign off and governance protocol to follow in the preparation of external facing communication material used by the community liaison team to achieve the objective set out in this plan. Internal briefing notes will be designed based on this content and will be shared for information as required.

Type of content for sign off	Level One (Initial draft)	Level Two (development)	Level Three (design approval)	Level Three (final sign off)	Level Four (For information)

Collateral (business cards, posters, banners etc) Letters to businesses and residents Plans and strategies etc Media releases	Subject matter expert Communications team	Project team Community Liaison	Project team (including SRO) Communications team	Project manager Project SRO Cabinet member(s)	Cabinet members and councillors Council Connect
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IX. Action plan

This section will show a timeline of activity required to deliver this communication approach.

X. Risks and issues

This section outlines risks and issues related to not delivering the right communication at the right time.

XI. Risks

Likelihood of it happening (rated 1 (very unlikely) -5 (extremely likely))

Impact on communication and engagement (rated 1 (no impact) -5 (high impact))

Severity of the risk/issue on the communication outcomes (combined from likelihood and impact) (rated 1 (not severe) - 25 (extremely severe))

	Likelihood	Impact	Severity	Reason for assessment	Mitigating action	Update
Work completion times are delayed	2	4	8	Any delays might be caused by technical issues, or factors out of the control of those delivering the works. This would result in the communication not being accurate where specific information is provided	Ensure indication of time expected on works suggests an approximate timeframe and caveats external factors may give reason for works to take longer than originally anticipated	
Works are extended/expanded from originally planned	2	4	8	Unexpected observations during delivery of works may require additional work to be carried out	Provide a caveat in the communication that assessment of existing infrastructure will be carried out as part of the delivery of work to ensure the new installation operates effectively. Should any replacement or repairs	

					be required, this may extend the timings of the works planned	
Adverse weather conditions delay/impede effective communications	1	2	6	Work is starting in the middle of winter and may be impacted by adverse conditions. In most cases this will not affect how communication received, however in some case communication may be impeded such as storms where electrical facilities are affected and snow where post cannot be delivered	Prior to sending out information, weather checks will be considered and may mean earlier dispatch of letters etc. In extreme weather, it is also likely works would be delayed and communications would be sent as soon as possible.	

XII.Issues

	Likelihood	Impact	Severity	Reason for assessment	Mitigating action	Update
Minimal time available to provide notice for	2	4	12	Provided the letters are sent before Christmas, after the General Election, the letters	Send letters using hybrid mail by 13 December 2019	Draft letters are being reviewed

first round of works commencing in Jan 2020				should arrive at all addresses by the end of 2019, providing at least 6 days' notice of planned works		
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Reference matrix for severity score (combined from likelihood and impact)						
No risk to comms and engagement						
Minimal risk to comms and engagement						
Acceptable risk to comms and engagement						
High risk to comms and engagement						
Extremely high risk to comms and engagement						
	Likelihood					
		1	2	3	4	5
Impact	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	20
	5	5	10	15	20	25

XIII. Knowledge gaps

The table below raises questions for consideration to be able to deliver the communication and engagement for the community liaison. The answers will be recorded here as a record for future reference.

Who and how do we send mailings out (database, GDPR, mailing house, resource for manual delivery)	The B&NES GIS team will provide the data and this will be shared with the B&NES Hybrid mail team who will distribute the letter on a pre-agree template, in black and white. Inserts are not possible, these are usually transferred to an additional sheet (insert) if they are required.
What the times and scales of each work planned is (delivery programme)	The schedule has been developed and the Highways team are working with the community liaison to identify the medium and high impact works.
Access to website for non BANES staff – to be arranged	This is in process. Access is granted and equipment (fobs) are being provided to the community liaison team.
Process and protocol for the receipt and response to concerns and queries	A draft process has been created and will be aligned with the B&NES complaints procedure.

Appendix C. Communications Strategy Implementation Phase

Clean Air Zone Communication Strategy

Implementation phase: Nov 2019 to Nov 2020

Summary

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

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

As we near switch on, good news and key milestones will be highlighted, particularly around the number of vehicles upgraded as a result of financial support, and the improvements in air quality already made.

Increasingly, the CAZ will be promoted as one of the first steps towards more ambitious sustainable transport and travel policies that will contribute towards tackling the climate emergency and a better environment for everyone in B&NES.

Drop-in events and talking directly to residents and businesses has proved a very effective tool and will continue to be central to our strategy with a 'we're here to help' strapline promoted on video, radio and printed collateral.

Desired outcomes

- Residents, businesses and stakeholders understand the health impacts of NO₂, and why a CAZ is needed
- Residents and businesses in B&NES and neighbouring authorities know the zone's start date and whether they face charges
- All businesses in B&NES have been contacted by ourselves to gather detail on their fleets and be given information and help to access the support package
- Support packages have been vigorously promoted among local businesses and those in neighbouring authorities regularly travelling into Bath
- Residents and local businesses have easy access to information and support about street works
- Complaints and queries are well managed and monitored – improvements are made as a result
- Data on fleets is collected, stored and used to track vehicle upgrades and changes in travel behaviour as a result of the travel advisors' work

- Residents and local businesses are regularly informed of this progress and of good news stories and achievements – including improvements in air quality
- Residents and businesses have regular opportunities to meet and talk with the team
- Drivers of non-compliant vehicles and businesses know how and when to pay and where to find out about payment, enforcement and refund policies (2nd phase, 12 weeks prior to launch)
- We have gathered and are promoting statistics to show improvements in fleets across Bath as a result of our work
- Some wider work on engaging everyone on making conscious choices on sustainable travel and transport is started before the CAZ is launched
- Residents understand that the CAZ is one of a number of things that the council is doing to tackle the climate emergency.

How we'll achieve this

Building on the work done during the development of the business case, we've extended our engagement channels to include a community liaison team and sustainable travel and transport team offering face-to-face support to those affected by the CAZ, .

Publicity and press will be planned and created for:

- **A general campaign** – press and publicity to raise awareness to a wide audience, such as a 'countdown' campaign. This will include supporting the **national campaign**. Themes to be developed
- **The sustainable travel and transport advice team** – to support businesses and individuals affected by charges to access our support package from January 2020
- **The community liaison team** – to support residents affected by the CAZ e.g. street works prior to the launch from January 2020.
- **The project team** – to support engagement with registered taxis/PHVs, scheduled bus companies and local coach operators (already well underway) and other adhoc, general support

General campaign

Target: wide audience of residents, businesses and stakeholders in B&NES and neighbouring authorities

We'll continue to promote awareness of the CAZ and what it might mean for people with a planned 'countdown' campaign, working closely with communications teams in neighbouring authorities. There will be a particular focus on the 6 weeks prior to launch.

Focus/Key messages:

The messages are less specific than for our targeted business audience and will feature a 'countdown' theme where appropriate and possible.

- The CAZ means cleaner air for all across the whole of Bath
- Private cars will not be charged
- Zone boundary (maps)
- How to find out if your vehicle is compliant/access support
- What vehicles will be charged/reminders that private cars will not be charged
- Good news stories/milestones reached
- Infrastructure progress with a focus on minimising disruption and the work of our community liaison officer/localised information programme
- Promotion of the anti-idling and weight restriction enforcement programmes (we may treat these separately)
- The CAZ is just the start of a much wider programme to improve our environment and tackle the climate emergency. Links to be developed
- We're here to help – come and talk to us

Plus in phase 2 (12 weeks prior to launch):

- CAZ basics for switch on: how and when to pay and enforcement details
- Good news: summarise all that we've achieved and better air for Bath
- X weeks to go – Have you checked your vehicle?

Channels/collateral (to be confirmed):

Social media

- Social media campaign will be outsourced and developed for the 'countdown' campaign FB, Twitter and Insta advertisements and council posts. Themes and timing tbc.
- Share national posts (see below)

Video – for web and social

- Early Video 1: the basics outlining who pays, how it will work, where it is, when it starts and what support is available - for website and social media (Now)
- Video 2 – how to check your vehicle and pay the charge (Prior to launch)
- Video 3 – short success video with infographics on how air quality is already improved (on launch)

Print/Web/General Info

- An updated 'all you need to know' brochure (available via PDF online/some print for travel advisors)
- Direct mail: final postcard sent to all homes OR/AND targeted letter to non-compliant vehicle drivers after soft launch of cameras (but before launch) – arranged through DVLA
- Quarterly newsletter to subscribers – email (Mailchimp)
- Supporting photography and visuals for print, social and web
- Infographic with statistics to promote good news visually – for social and web

Press

- Regular press to main local papers featuring key milestones, decisions and good news stories – tailored for neighbouring local authorities where appropriate
- National press – see below.

Radio

- Radio advertising in bursts from 6 months, *to be confirmed once JAQU confirm their radio advertising focus for the south west*. Increasing in last 6 weeks: e.g. Local Breeze, Sam, Heart, Kiss, Jack FM
- National radio campaign (see below)

Outdoor

- Temporary covers on CAZ signage (12 weeks prior to launch)
- Regular drop-in events
- National billboard campaign (see below)

See month-by-month plan for more detail.

Supporting the national campaign

JAQU are developing a national campaign to promote awareness of charging CAZs.

This will include a national awareness campaign focused nationally but also tailored for local audiences (in Bath and also for the South West – Bristol, Bath, Swindon). Their plan covers radio, display, social and outdoor advertising.

Their messaging will drive people to the online vehicle checker and later to their central payment system, developed by JAQU to find out where and what they'll be charged in each CCAZ across England. It will not cater for local exemptions and concessions. Their site will feature a web link to Bath's pages.

What we'll do

- Contribute to the national campaign with information and ideas from November 2019
- Use the government's campaign 'top line' creatives and messaging and localise them to ensure a seamless 'brand' for CAZ. The following straplines are being used with short form and long-form messages that we can localise.
 - Cleaner air ahead (using CAZ sign)
 - Healthier air is on the horizon
 - Clean Air Zones are coming / A Clean Air Zone is coming
- Avoid duplicating effort where it might become confusing, such as radio, outdoor billboard and social. Careful planning is required with JAQU.
- Ensure a seamless web journey for a customer going to JAQU and then onto Bath's site.
- Share the final creatives with the project board when it's available

How we mould our campaign around JAQUs will be confirmed following confirmation of plans from central government after the election.

Target: wide, general audience in B&NES and neighbouring authorities

Supporting the travel and transport team (lead generation and content)

A travel advice team will be in place from January 2020. Telemarketers will aim to call around 6.5K businesses to gather some basic information on how a CAZ might affect them and, accordingly, offer tailored help and advice.

This includes promoting the financial assistance scheme (FAS) where applicable, the use of telematics devices on vehicles (to confirm eligibility for the FAS), advising on concessions/exemptions, and encouraging more sustainable transport and delivery plans.

Communications will provide the collateral required by the team to efficiently carry out their role, with a focus on generating leads.

Target audience:

Businesses, particularly SMEs and sole traders, organisations with larger fleets, public sector organisations, schools and charities in B&NES and those located in neighbouring authorities but regularly visiting Bath.

Taxis/PHVs, scheduled bus fleets, and local coach companies are already being contacted regularly about the CAZ by the project team and require less focus. See Project Team section.

Channels and collateral required:

There may be some overlap with the general countdown campaign tbc.

- Direct calls made by the sustainable travel and transport team
- A5, 4 page, colour leaflet outlining the support package with a call to register interest online
- Distribution of leaflets at local trade counters and merchants
- Radio advertising (from February/March 2020) focusing on generating leads for the financial assistance scheme.
- Dedicated web pages with 'expression of interest forms' for generating leads
- Press releases inviting businesses to register their interest/talk to an advisor
- Press releases calling for people to apply for concessions/exemptions
- Share press and collateral with neighbouring authorities communication teams
- Social media campaign focusing on generating leads for the financial assistance scheme (this could tie in with the early countdown campaign)
- Promotion of regular drop in events (as per general campaign)
- Advertising, promotions or articles in local niche business press e.g. Business Exchange, Bath Life etc.
- Summary of support packages (in detail) to support the team internally
- Sharing press and print with local business groups to share with members :
 - Bath Chamber of Commerce
 - Bath Bid
 - Invest in Bath
 - Federation of Master Builders
 - Registered taxi drivers

- Southgate
- Creative Bath
- Other tbc.
- 'Certified compliant with Bath's CAZ' bus sticker for bus companies (and others) to promote clean engines on older vehicles – reassuring residents.

See month-by-month plan for more detail.

Community Liaison Team

A community liaison team is in place working with the installation team to plan and deliver communications for residents and businesses likely to be affected by street work. This is a year-long programme of works which includes laying ducts under footways for electrical cables and installing cameras and signage.

Communication will be by letter accompanied by a press release and social media (via the highways account) only if the work is significant. Works signs will also be installed in advance. The aim is to build good relations with those affected, avoiding ill-feeling by being helpful, knowledgeable, available and transparent.

There is already a dedicated web page at www.bathnes.gov.uk/CAZupdate which will eventually list and describe all planned and completed work. Comms will support the work of the CLO where required, ensuring that all of the communications are joined-up between departments and that it's cost-effective and efficient.

Target audience:

Households, communities, schools, and businesses in the city that are affected by street works

Key activities for CLO with support from communications:

- Develop a plan of street work identifying the type of work, level of disruption (small, medium, large) and the streets likely to be affected so that a communication plan can be drawn up
- Ensure this plan is fed back to central communications for joint transport planning during 2020
- Maintain a digest of planned and completed street work on a dedicated webpage www.bathnes.gov.uk/CAZupdate so that residents, stakeholders and the press can stay informed of progress and how works might affect them.
- Promote regular drop-ins (as per general campaign) where the public can talk to a team member and voice any concerns.
- Liaise with project team on what work will also require a press release and social media – write press releases as required
- Communicate with residents and ward members at least one week in advance of work starting, outlining what's happening, how it might affect residents, and why a CAZ is necessary (health reminder).
- Work efficiently with hybrid mail and the GIS team at the council to distribute letters or make a decision to drop by hand and discuss with residents

- Work efficiently with highways communication team
- Provide updates to the Roadworks Bulletin (Highways) if work is significant
- Reassure people about camera privacy and how data will be stored/handled
- Promote the CAZ_info@bathnes.gov.uk widely so people know who to contact if they have a concern or question about planned street works.
- Provide information and updates to Council Connect on how to respond to calls
- Monitor and manage complaints promptly and sensitively and liaise with the relevant teams so that issues are addressed and not repeated.
- Make our complaints policy available online, including the process
- Regularly inform customer service and OSS of works and circulate the complaints policy

Support for the project team

Key audience: Registered taxi/PHV drivers/firms, local bus companies running scheduled services and local coach companies.

The project team will continue to work closely with local bus and coach companies to help them access the funds enabling them to retrofit or replace non-compliant vehicles. This will ensure that all scheduled buses and the majority of coaches in Bath are compliant by switch-on.

- We'll promote this 'good news' story to reassure residents, and include information on this work in printed and online collateral.

Taxi/PHV drivers are an important audience and already receive regular communications about the CAZ direct from the taxi licensing team via text. The objective is to help drivers access the financial assistance scheme (to help upgrade their taxis/PHVs), understand the market for lower emission vehicles, discourage idling and keep drivers informed of licensing and policy changes. Regular events will be held specifically for registered drivers.

The following collateral will help to support the team, generate leads for the FAS, and promote their events:

- Update the dedicated landing page for taxi drivers online and promote the short URL www.bathnes.gov.uk/CAZTaxis
 - Include information and a link to the Support page
 - Include events listings for taxis
 - Publish taxi-focused FAQs arising from meetings
 - Include links and content to help taxis understand lower emission options (as required)
 - Include information on anti-idling information
- Promote 'taxi driver' good news stories in the press to reassure residents e.g. X% of taxis upgraded before switch on / clean fleet etc.
- Print 1000 plus of the A5 Support/FAS lead-generation leaflet to distribute at events and/or send to taxi drivers – include FAQs common to taxi and business audience.

See detailed plan, timeline and estimated costs on a separate spreadsheet