



Bath Clean Air Plan

Bath and North East Somerset Council

SOC Engagement Summary Report

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Bath Clean Air Plan

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Appendix A. Organisations Engaged With

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Acronyms and Abbreviations

ANPR	Automatic Number Plate Recognition
B&NES	Bath and North East Somerset Council
BCC	Bristol City Council
CAZ	Clean Air Zone
DfT	Department for Transport
DEFRA	Department of Food and Rural Affairs
EV	Electric Vehicle
FBC	Full Business Case
FOBRA	Federation of Bath Residents Associations
HGV	Heavy Goods Vehicle
JAQU	Joint Air Quality Unit
JLTP	Joint Local Transport Plan
JTS	Joint Transport Study
JSP	Joint Spatial Plan
KRN	Key Route Network
LGV	Light Goods Vehicle
NOx	Nitrogen Oxides
NO ₂	Nitrogen Dioxide
NSC	North Somerset Council
OBC	Outline Business Case
PHE	Public Health England
PM	Particulate Matter
RPZ	Residents' Parking Zone
RUH	Royal United Hospital Bath
SOC	Strategic Outline Case
SGC	South Gloucestershire Council
TARA	The Abbey Residents Association
ULEV	Ultra-Low Emission Vehicle
UWE	University of the West of England
WC	Wiltshire Council
WECA	West of England Combined Authority
WPL	Workplace Parking Levy

Note to Reader

This report was prepared in the context of the draft OBC in Autumn 2018. It summarises and responds to the comments made during the engagement period of February and July 2018.

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 OBC, 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 was written to support the OBC and summarises the comments received in relation to the options proposed at that time and shows how these have been incorporated in the OBC.

1.1 Charging Clean Air Zone (CAZ)

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 a specific geographical area where targeted action is taken to improve air quality with charging and non-charging measures. Minimum vehicle emissions standards apply in a CAZ, and vehicles which don't meet those standards (i.e. higher emission vehicles) are charged a daily fee to enter or drive within it. It's designed to encourage the use of lower-emission vehicles or cleaner, alternative modes of transport.

A CAZ is not a congestion charge. A CAZ aims to improve air quality by discouraging the use of high emission vehicles. A congestion charge targets high traffic flow. The Government is providing funding for Local Authorities that breach pollution limits to implement CAZs in line with the Government's draft Clean Air Zone Framework.

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 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)

Government regulations dictate that local authorities cannot make additional revenue or profit from a CAZ. Any revenue from the zone would be spent on scheme operation or be reinvested in measures to encourage cleaner travel and transport in Bath.

1.2 Stages in the Development of the Clean Air Plan

1.2.1 Strategic Outline Case (SOC)

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 JAQU, and within the HM Treasury Green Book, and is required to secure the necessary funds for implementation.

A Strategic Outline Case (SOC) is the first phase of the process. This was developed during early 2018 and published in March 2018. It considered a range of possible options for tackling air quality in Bath and concluded that the introduction of a 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 (rather than medium or large zone) was preferred because it offers the greatest benefit in terms of reducing air polluting across the whole city, with the least impact on residents.

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.

1.2.2 Engagement on the SOC

The Council recognises the need for ongoing public engagement due to the restrictive timescales of the project. 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 and 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.

This early phase of engagement was not a formal consultation, rather, the aim was to engage as many people as possible on local air quality issues. Various information was published (but with no specific proposal upon which feedback was sought), a range of events and activities were held, and comments were continually invited (with no specific deadline stated).

Whilst some of the engagement activities focused on specific audiences or issues, other activities were designed to raise the profile of the air quality problem and the Council's work to address it.

This report provides an overview of the comments recorded during this period of engagement and shows how these have been used to influence the development of the OBC.

1.2.3 Outline Business Case (OBC)

This report was published alongside the draft OBC which provides the detailed study options, the technical work undertaken, the funding bid, the draft charging order and engagement work. This reflects the stage of the process in August 2018.

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 single preferred option and sets out a wide range of technical information which included consideration of the need for the intervention, financial, economic and management issues and how the CAZ would be delivered.

The preferred option is explained in detail in the draft OBC. In summary it includes the following key elements.

Preferred option:

- Introduction of a Class D Charging CAZ (including a charge for higher emission cars);
- Charge of £9 per day (once in every 24-hr period) for higher emission cars, light good vehicles, private hire vehicles and taxis;
- Charge of £100 per day (once in 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 include vehicles within the disabled passenger vehicle tax class and historic cars; and
- Locally agreed concessions and mitigations will also apply to help vulnerable groups and businesses.

The draft OBC setting out the preferred option will be publicised and publicly shared through a formal six-week process of engagement with the general public and stakeholders. This process will be used to help understand how the proposals may affect different groups and will guide the Council in formulating the next steps in the project. Where appropriate and possible, comments will be taken into account in a revised OBC will be published for a decision by B&NES Cabinet. The West of England Combined Authority (WECA) will also be kept informed of the decision-making process.

1.2.4 Full business case (FBC)

This will be the next main phase of the project and is anticipated to be progressed during 2019. This will finalise the design and delivery of the preferred scheme.

1.2.5 Engagement process and objectives

The Council is committed to engaging the public and stakeholders at every stage of the project, including development of the Plan and implementation of the Clean Air Zone. This process began in February 2018 and is ongoing.

The aim is to ensure everyone in the area has an opportunity to express their views and share opinions. The two main objectives of the engagement activity are to:

- Have ongoing dialogue with stakeholders, residents and the wider community to raise the profile of the air quality problem in Bath, generate an understanding of the associated health

impacts, the proposed measures to improve air quality, and the possible implications for travel choices

- Seek feedback at key stages of the Clean Air Plan and, where possible, utilise this in the technical assessment of the shortlisted CAZ options⁴.

1.3 Purpose and context of this report

This report provides a summary of the feedback generated from engagement work undertaken between February and July 2018. During this period, and therefore at the time these comments were received and collated, it is important to note that no firm decisions had been made about the type of CAZ that would be required for Bath. Indeed, during this time a number of technical assessments were being progressed, looking at all three options that were initially identified in the SOC.

This report summarises the engagement activities undertaken and presents the frequently identified issues, views and comments received with the exception of commercially sensitive information. Comments have been paraphrased and grouped in order to provide a manageable summary.

Responses to the comments have been provided, highlighting how the feedback has been used to influence the development of the Clean Air Plan and CAZ and why it's not been possible to take some comments into account.

The comments have been considered in a range of contexts:

- Initially to inform the assessment of the shortlisted options and development of the OBC; and
- Then re-visited to ensure that key issues were addressed in the context of the preferred option for a Class D CAZ.

The responses documented in this report, compiled in Autumn 2018, are therefore written within the context of the preferred option, a Class D CAZ, identified in the draft OBC.

Comments received regarding specific actions or areas outside the remit of Bath's Clean Air Plan are not reported. The Council is working on other initiatives which cover these issues and these comments have where possible, been passed on to the appropriate team.

This document forms an Appendix to the OBC and sits alongside a range of other Appendices that explain the preferred option in more detail. Many of these Appendices also deal in more detail with issues raised during engagement. This report therefore makes various cross references to these documents, in particular to those appendices dealing with:

- **The development of the CAZ boundary** – OBC-4 'Clean Air Zone Boundary Updates' within Appendix A of this OBC.
- **The development of specific exemptions and scheme enforcement** – OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC.
- **The development of supporting measures** – OBC-08 'Option Assessment Report', Appendix C of this OBC.
- **Signage and camera plans** – OBC-01 'Signage, Boundary and Camera Plans' within Appendix A of this OBC.
- **The monitoring and evaluation plan** – OBC-26 'Evaluation, Monitoring and Benefits Realisation Plan', Appendix R of this OBC.
- **Stakeholder management and engagement plan** – OBC-07 'Stakeholder Management and Engagement Plan', Appendix B of this OBC

⁴ <http://www.bathnes.gov.uk/bath-breathes-2021>

- **The draft charging order** – OBC-29 'Draft Charging Order', Appendix J of this OBC

1.4 Structure of this Report

The structure of this report is as follows:

- Chapter 2 – Overview of Engagement Work;
- Chapter 3 – Quantitative Feedback;
- Chapter 4 – Qualitative Feedback; and
- Chapter 5 – Summary.

2. Overview of Engagement

This chapter outlines the engagement events held for the general public and organisations during the period February to June 2018 and the other engagement methods used. During this period a total of 37 engagement events were held.

At the start of the process professional judgement and local knowledge was used to compile a list of groups across B&NES to engage with, and this list evolved throughout the engagement period. Multiple methods were employed to ensure we reached as wide an audience as practically possible (see Section 2.3). Work was undertaken to ensure that the following key demographics were included in the engagement process:

- B&NES residents;
- Black and ethnic minority households;
- Car drivers;
- Commuters;
- Disabled/access groups;
- HGV drivers;
- Hospital patients;
- LGV drivers;
- Low income households;
- Parents;
- Retired residents;
- Students;
- Taxi drivers and operators;
- Tourists;
- Unemployed residents; and
- Young people.

This list continues to be added to as engagement progresses.

2.1 Public Engagement Events

The project team held 11 public engagement events, covering Bath and the wider area. These events, which were open to all, included drop-in sessions (8) and public surgeries (3). The drop-in sessions were in public locations where people were encouraged to speak informally with members of the team. The surgery sessions were based on a more structured format and anyone with detailed or technical questions, or concerns regarding the SOC, had the opportunity to book a one-to-one, thirty-minute, meeting with members of the project team. These events were advertised on the project webpages⁵, in newsletters and via social media posts. Some organisations and groups were also invited to attend via email. An overview of the public engagement events held is shown in Table 1 below.

⁵ <http://www.bathnes.gov.uk/bath-breathes-2021>

Table 1: Overview of the 11 public engagement events held

Event and Location	Date and Start Time	Feedback / responses	Attendees / People Reached
Drop-in Session 1 Widcombe Social Club, Widcombe Hill, Bath.	Date: 21/02/2018	24 feedback forms received 51 logged comments	51
Drop-in Session 2 Milson Street, Bath.	Date: 09/04/2018 Start Time: 16:00	5 feedback forms received 4 online responses 31 logged comments	100
Public Surgery 1 Dome Room, Guildhall, Bath.	Date: 18/04/2018 Start Time: 15:00	19 logged comments	6 surgery sessions
Public Surgery 2 Room 2.3, Guildhall, Bath.	Date: 30/04/2018 Start Time: 15:00	36 logged comments	8 surgery sessions
Drop-in Session 3 Morrisons, Bath.	Date: 09/05/2018 Start Time: 15:00	14 logged comments	40
Drop-in Session 4 Council Chamber, Guildhall, Bath.	Date: 15/05/2018 Start Time: 16:30	6 logged comments	15
Drop-in Session 5 Sainsbury's, Bath.	Date: 29/05/2018 Start Time: 15:00	33 logged comments	32
Drop-in Session 6 Royal United Hospitals (RUH) Atrium, Bath.	Date: 05/06/2018 Start Time: 10:00	32 logged comments	40
Public Surgery 3 Dome Room, Guildhall, Bath.	Date: 06/06/2018 Start Time: 15:00	15 logged comments	3 surgery sessions
Drop-in Session 7 Tesco, Midsomer Norton,	Date: 12/06/2018 Start Time: 16:00	10 logged comments	10
Drop-in Session 8 Clean Air Day, City Centre, Bath.	Date: 21/06/2018 Start Time: 10:00	Awareness raising event, therefore no comments were logged.	Event well attended

2.2 Engagement Events with Organisations

In total 209 organisations were contacted for engagement, 160 of these directly / indirectly engaged with the project team via email, online surveys, newsletters, paper feedback forms. 54 organisations attended engagement events. 26 engagement events were held specifically for organisations within Bath and the wider area. Groups engaged with through events include:

- **Government Bodies;**
- These included Public Health England (PHE), and Highways England.
- **Local Authorities / Government;**
- These groups included B&NES cabinet members, councillors and political groups, Bath City Forum members, South Gloucestershire Council (SGC), Bristol City Council (BCC), West of England Combined Authority (WECA), and Wiltshire Council (WC).
- **Businesses;**
- This included engagement with The Federation of Small Businesses and attendance at the Business Initiative Lunch.
- **Residents' Associations (RAs);**
- Including Federation of Bath Residents Associations (FOBRA), Bear Flat Association, Camden RA, Catherine Place RA, Greenway RA, Lower Oldfield Park RA, The Abbey Residents Association (TARA) Upper Oldfield Park RA, and Vineyards RA.
- **Transport Operators;**
- These included Arleen Coaches, Bath Taxi Association, Buglers Coaches, Centurion Coaches, The Community Transport Association, Cycle Bath, Faresaver Buses, First Group, and Roadrunner Mini Buses.
- **Key Service Providers;**
- These included University West of England (UWE), Bath Spa University, University of Bath, Royal United Hospital Bath (RUH) and Emergency Services.
- **Media Outlets; and**
- Including Bath Chronicle, Bath Live, BBC Points West, BBC Radio Bristol, ITV West Country, The Breeze FM.
- **Campaign Groups**
- These included Bath Deserves Better, Safer Routes to School, and Transition Larkhall.

A full list of organisations engaged with can be found in Appendix A of this document.

A range of engagement methods were used with these groups. This included briefings, workshops and face-to-face meetings. The council also attended existing group meetings including the Bath City Forum and The Initiative's Business Lunch.

Organisations were invited to events via emails. The outreach emails, as well as acting as invitations to events, also included information on the CAZ proposals, upcoming public events and links to further information and the online survey.

A specific 'Bath Breathes' newsletter was published at regular intervals and each edition advertised the events. Information on the Clean Air Plan and CAZ proposals were also included in newsletters published by other Council departments or by partner organisations and these were circulated among interested parties, for example the Public Health newsletter.

An overview of engagement events held with organisations is shown in Table 2 below. Some of the events focused on increasing awareness and involved a presentation in an existing meeting or involved commercially sensitive conversations and therefore some have no comments logged.

The meetings detailed in Table 2 are formal meetings included in the event log. In addition to these, a range of other informal discussions have naturally taken place between Councillors and officers involved in the Plan.

Table 2: Engagement events aimed at organisations

Event and Location	Date and Start Time	Feedback / responses	Attendees
An all Councillor Briefing Guildhall, Bath.	Date: 03/04/2018 Start time: 14:00	Presentation was given for information; informal feedback was received	Various Councillors
Press Briefing Lewis House, B&NES, Bath.	Date: 03/04/2018 Start Time: 14:00	Presentation was given for information; no feedback was received	Bath Chronicle Bath Live BBC Points West BBC Radio Bristol ITV West Country The Breeze FM
Lib Dem Group Briefing Guildhall, Bath.	Date: 09/04/2018 Start Time: 18:30	3 logged comments	13 attendees
Residents Association Briefing Event Bath Royal Literary and Scientific Institution (BRLSI), Bath	Date: 19/04/2018 Start Time: 19:00	3 feedback forms 20 logged comments	11 representatives from: Camden RA Catherine Place RA FOBRA Lower Oldfield Park RA The Vineyards
Wiltshire Council Briefing	Date: 19/04/2018	Presentation was given for information; informal feedback was received	Wiltshire Council officers
Labour Group Briefing Guildhall, Bath.	Date: 23/04/2018 Start Time 17:15	Presentation was given for information; informal feedback was received	4 attendees
Briefing Event: LA's and HE Guildhall, Bath.	Date: 24/04/2018 Start Time: 10:00	9 logged comments	8 representatives from: WECA SGC WC BCC Highways England

Event and Location	Date and Start Time	Feedback / responses	Attendees
Engagement Partner Briefing Event BRLSI, Bath.	Date: 24/04/2018 Start Time: 15:00	Presentation was given for information	9 representatives from: B&NES Bath Spa University PHE RUH University of Bath UWE
Taxi Forum Odd Down Sports Centre, Bath.	Date: 25/04/2018 Start Time: 10:30	17 logged comments 13 actions/responses	1 councillor, council officers and members of the trade
First Group Meeting Civic Centre, Keynsham.	Date: 25/04/2018 Start Time: 13:30	4 logged comments	5 attendees
Meeting Cllr. Samuel Guildhall, Bath.	Date: 30/04/2018 Start Time: 15:00	20 logged comments 9 actions/responses	1 attendee
Independents Group Briefing Independent room, Guildhall.	Date: 01/05/2018 Start Time: 13:00	Presentation was given for information; informal feedback was received	2 attendees
Local Bus Operators Meeting	Date: 02/05/2018	Discussion involving commercially sensitive information. Not reported.	Various local bus operators
Bath City Forum Guildhall, Bath.	Date: 15/05/2018 Start Time: 18:00	14 logged comments	Various Councillors and members of the public
CT&E Scrutiny Panel Guildhall, Bath	Date: 22/05/2018	8 logged comments	Various Councillors. For further detail please refer to minutes on B&NES website ⁶
Greenway Residents Association AGM St Luke's Church, Bath	Date: 04/06/2018 Start Time: 19:30	22 logged comments	40 attendees
Attendance at South West Air Quality Conference Somerset County Cricket Club, Taunton	Date: 12/06/2018;	Presentation was given for information; no feedback was received	85 attendees from various organisations including: Councils from the South West PHE Universities
The Initiative Business Lunch Shrubbery Restaurant, Bath College	Date: 14/06/2018 Start Time: 13:00	7 logged comments	n/a
Local Bus Operators Meeting	Date: 14/06/2018	Discussion involving commercially sensitive information. Not reported.	Various local bus operators

⁶ <https://democracy.bathnes.gov.uk/mgMeetingAttendance.aspx?ID=4544>

Event and Location	Date and Start Time	Feedback / responses	Attendees
Coach Operator Meeting	Date: 15/06/2018	45 logged comments	4 attendees representing: Arleen Buglers Roadrunner
Bath Preservation Trust Meeting Bath Preservation Trust offices	Date: 26/06/2018	8 logged comments	Bath Preservation Trust
Surgery Session 4 Guildhall, Bath	Date: 27/06/2018 Start Time 15:00	15 logged comments	5 attendees (local interest groups / businesses)
Residents Association Briefing Guildhall, Bath.	Date: 28/06/2018 Start Time: 18:30	44 logged comments	Attendees: resident's associations and council officers
Meeting with representative from Bath Alliance for Transport and Public Realm	Date: 29/06/2018 Start Time: 14:00	9 logged comments	1 attendee
Conservative Group Briefing Guildhall, Bath	Date: 09/07/2018 Start Time: 18:15	10 logged comments	22 attendees

2.3 Additional Engagement Methods

All feedback and comments at the engagement events were recorded to the best of the project teams' ability. In addition to events, a number of engagement methods were used to ensure that the engagement work reached as widely as possible. Feedback was sought and recorded from the following means:

- **The online questionnaire;** This was available from the project webpages from the 6th April for 13 weeks. The questionnaire consisted of open and closed questions about the CAZ and the non-charging measures. It was edited on the 16th April to include additional questions. Both versions of this form are available in Appendix C of this document.
- **The paper questionnaire;** This was available at engagement events. The questionnaire consisted of open and closed questions about the CAZ and the non-charging measures. It was edited after the first drop-in session to reflect feedback and lessons learnt. Both versions of this form are available in Appendix B of this document.
- **Email correspondence;** A specific council email address was provided on engagement materials and on the council website. Any detailed comments or concerns were directed here. All emails were responded to and all comments were logged.
- **Telephone conversations;** A council telephone number was provided on engagement materials and on the council website. Telephone conversations were logged where possible. and
- **Social media;** All comments received on Facebook and Twitter, included those responding to council posts, were logged and are included within this report.

2.4 Engagement Materials

During the engagement period, the following information was made available on the Bath Breathes webpages:

- The Strategic Outline Case (SOC);
- A summary of the SOC;
- Frequently asked questions (FAQs);
- Video infographics;
- Links to social media channels for regular updates; and
- Regular newsletters, also distributed via email.

Additionally, paper copies of the SOC summary and newsletters were provided at engagement events.

2.5 Media and Social Media Coverage

To raise awareness of the SOC publication and commencement of the engagement work, the Council issued a press release on 4th April 2018. From April 2018 to 17th July 2018, there were 17 articles reporting on Bath's Charging CAZ in the local media. Within this time the articles received a total of 75 comments and approximately 247 shares.

On National Clean Air Day there were both radio and general media reports, including coverage of local children performing a Clean Air Day rap. In the period up until 17th July 2018, the Council published 20 social media posts, 12 of which were promoted engagement events and the other 8 distributed information relating to the CAZ. Of the 20 social media posts from the Council 5 were posted on Twitter⁷ and the remaining 15 were posted on Facebook⁸.

The social media posts generated approximately 65 comments from the general public in response. On Facebook there were 40 responses which generated a total of 28 likes / shares. On Twitter there were 25 responses from the general public which generated 29 likes / shares in total.

Comments posted on social media by the public are reported alongside all other qualitative feedback within Chapter 4.

2.6 Methodology for Analysis

Feedback has been analysed in different ways depending upon format.

Quantitative data collected from the 'closed' questions in the paper and online surveys is reported factually and in numerical format in Chapter 3.

The majority of feedback received was qualitative:

- Comments received at engagement events. (These were recorded during or immediately after the event and are included in this report. The project team summarised comments and issues using professional judgement. Every effort was made to ensure logged comments accurately reflect discussions held)
- Comments received from the open-ended questions in the paper and online surveys.

⁷ <https://twitter.com/bathnes>

⁸ <https://www.facebook.com/bathnes/>

All the qualitative feedback is considered together within Chapter 4. Comments have been summarised, paraphrased and categorised. Please note that:

- Comments made multiple times are listed only once
- Comments are listed in no particular order of priority.
- Comments have been grouped using professional judgement and without any conscious bias.

3. Quantitative Feedback

This chapter provides an overview of the quantitative feedback received from the online and paper surveys.

3.1 Survey size

From 6th April to 9th July, 113 online survey responses and 33 paper survey responses were received. Both surveys were updated within the engagement period to reflect feedback received and lessons learned. There were 33 responses to the original online survey and 80 responses to the updated online survey. The original paper survey yielded 24 responses and the updated paper survey had 9 responses.

Both the online and paper surveys (available in Appendix C and B of this document respectively), included closed questions concerning air pollution and the Clean Air Plan. Given the similarities between the questions in the paper and online surveys, it has been considered appropriate to aggregate the two surveys for analysis, and as such 146 responses are analysed in this section.

3.2 Headline findings

The key findings from the quantitative analysis are:

- 83% of respondents were concerned about air pollution in Bath
- 70% of respondents supported a charging zone in principle
- 79% of respondents understood why a CAZ is needed
- All non-charging measures received a greater level of support than they did opposition.

3.3 Detailed findings

3.3.1 Respondent type

The majority of respondents were from the local area. 106 respondents stated that they were B&NES residents, none were Bristol residents and only 1 respondent stated 'tourist'.

Figure 1 shows that 91 respondents were car owners and predominately used their cars for non-work uses. 13 respondents were local business owners. It is noted that none of the survey respondents were LGV or HGV drivers, and this point is considered in the "Next Steps" section of the report.

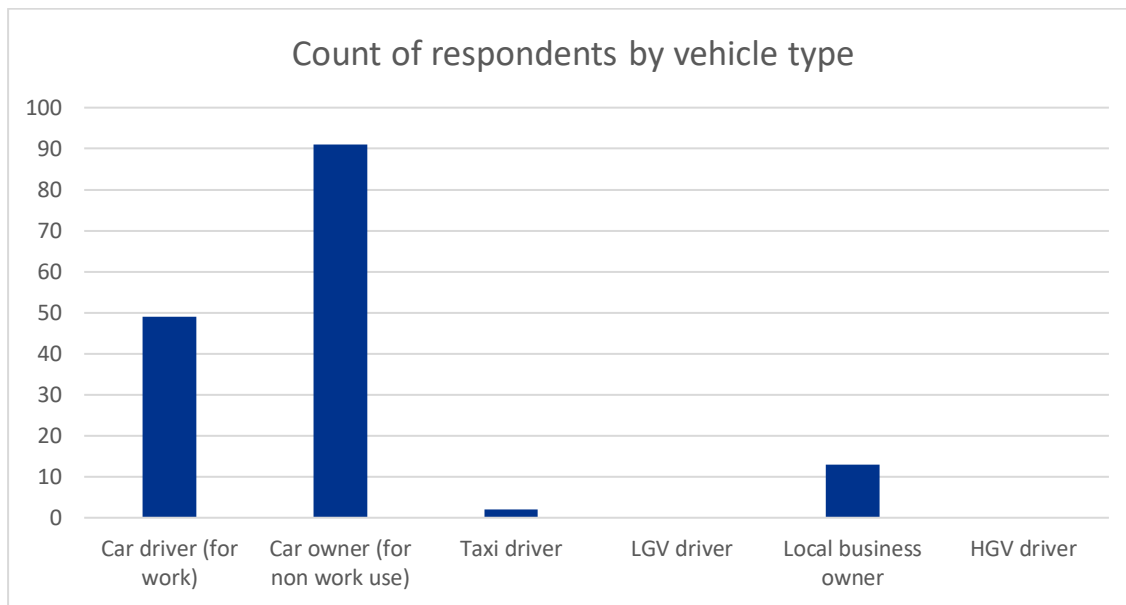


Figure 1: Questionnaire respondents by vehicle type

122 combined responses to the Paper Survey General Information Q1 and Online Survey Q8

The majority of respondents were individuals as shown in Figure 2. Responses were submitted by the general public and organisations including local businesses, residents' associations, and transport operators. Councillors and Officers were also among the respondents.

Are you responding on behalf of an individual or organisation?

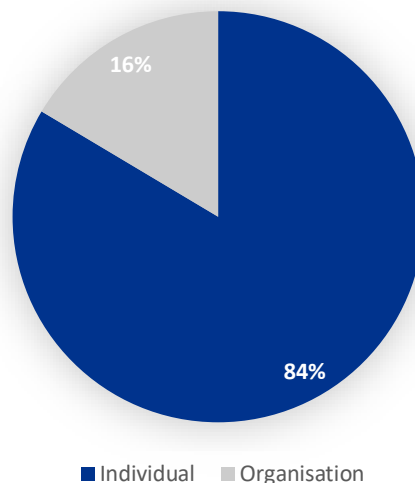


Figure 2: Questionnaire respondents by individual or organisations

146 combined responses to the Paper Survey General Information and Online Survey Q13

3.3.2 Views of air quality issues

Among respondents there was a widespread recognition and concern about air quality in Bath. The majority of respondents (89%) were aware that air pollution was a problem within Bath (Figure 3), with 83% concerned about air pollution within Bath (Figure 4).

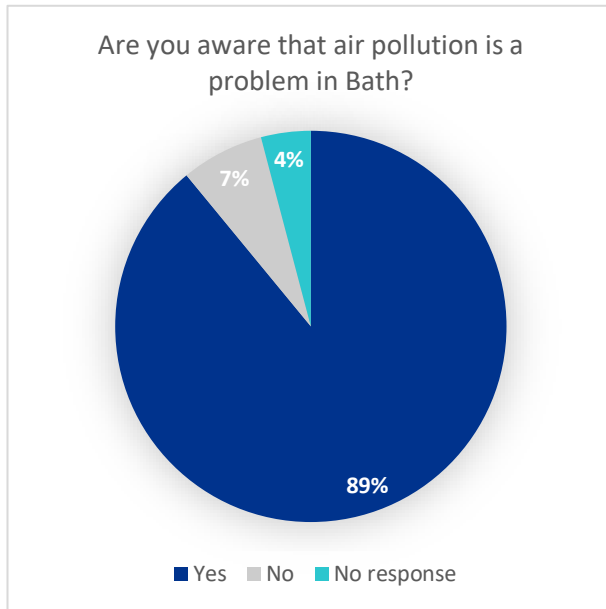


Figure 3: Pie chart showing the awareness about air pollution in Bath.

146 combined responses to the Paper Survey Q1 and Online Survey Q1

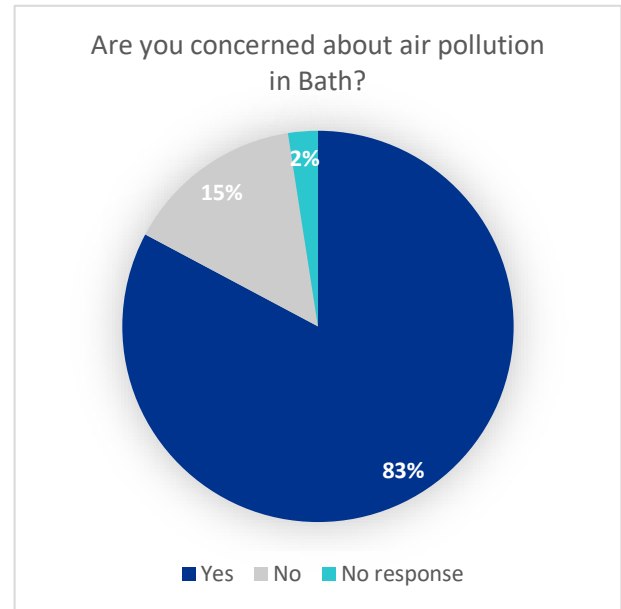


Figure 4: Pie chart showing the concern about air pollution in Bath.

146 combined responses to the Paper Survey Q2 and Online Survey Q2

Understanding and support of a charging zone was strong. 79% of respondents understood the requirement for a CAZ within Bath and 70% supported a charging zone in principle (Figure 5 and Figure 6 respectively). It should be noted that this question did not differentiate between vehicle class charged.

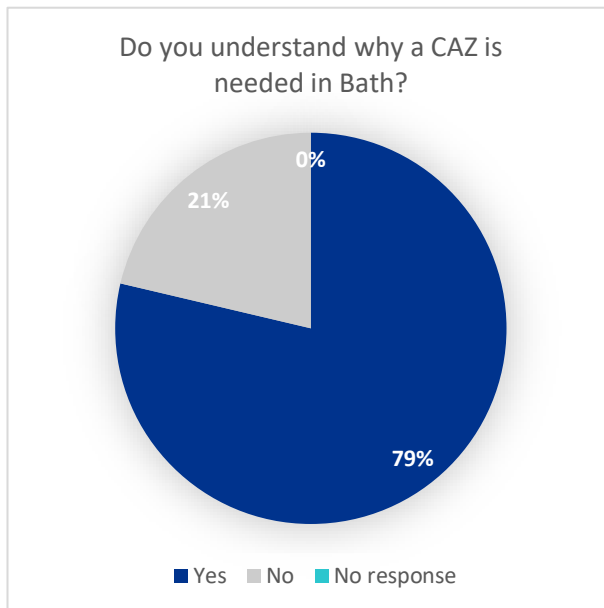


Figure 5: Pie chart showing public understanding of a CAZ Bath

146 combined responses to the Paper Survey Q3 and Online Survey Q4

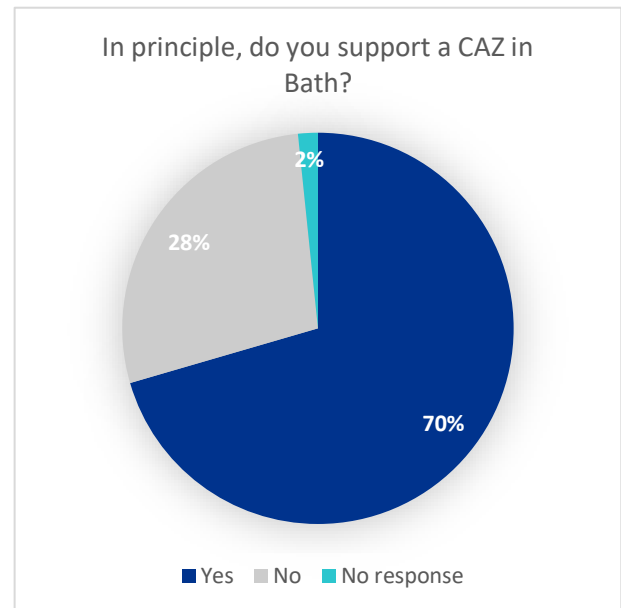


Figure 6: Pie chart showing public support of a CAZ in Bath

146 combined responses to the Paper Survey Q4 and Online Survey Q5

3.3.3 Views on non-charging measures

The updated online surveys included questions about support for non-charging measures. Of the 80 respondents to the updated survey, 77 responded to the questions on the non-charging measures (Question 9 in the updated online survey). A list of the non-charging measures and the responses are shown in Table 3.

Respondents expressed more support than disagreement for all of the non-charging measures. The three most strongly supported non-charging measures were:

- *Implement public transport route improvements* – 60% of respondents strongly supported this measure;
- *Promote low emission vehicles for Hackney carriages/private hire* - 58% of respondents strongly supported this measure; and
- *Extend walking and cycling priority schemes* – 43% of respondents strongly supported this measure.

The level of 'no response' generally remained below 3% except for the measure relating to the sunset period for Euro 5 diesel vehicles which was 14%. Neutral responses ranged from between 9% to 42%.

Table 3: Responses to Non-Charging Measures

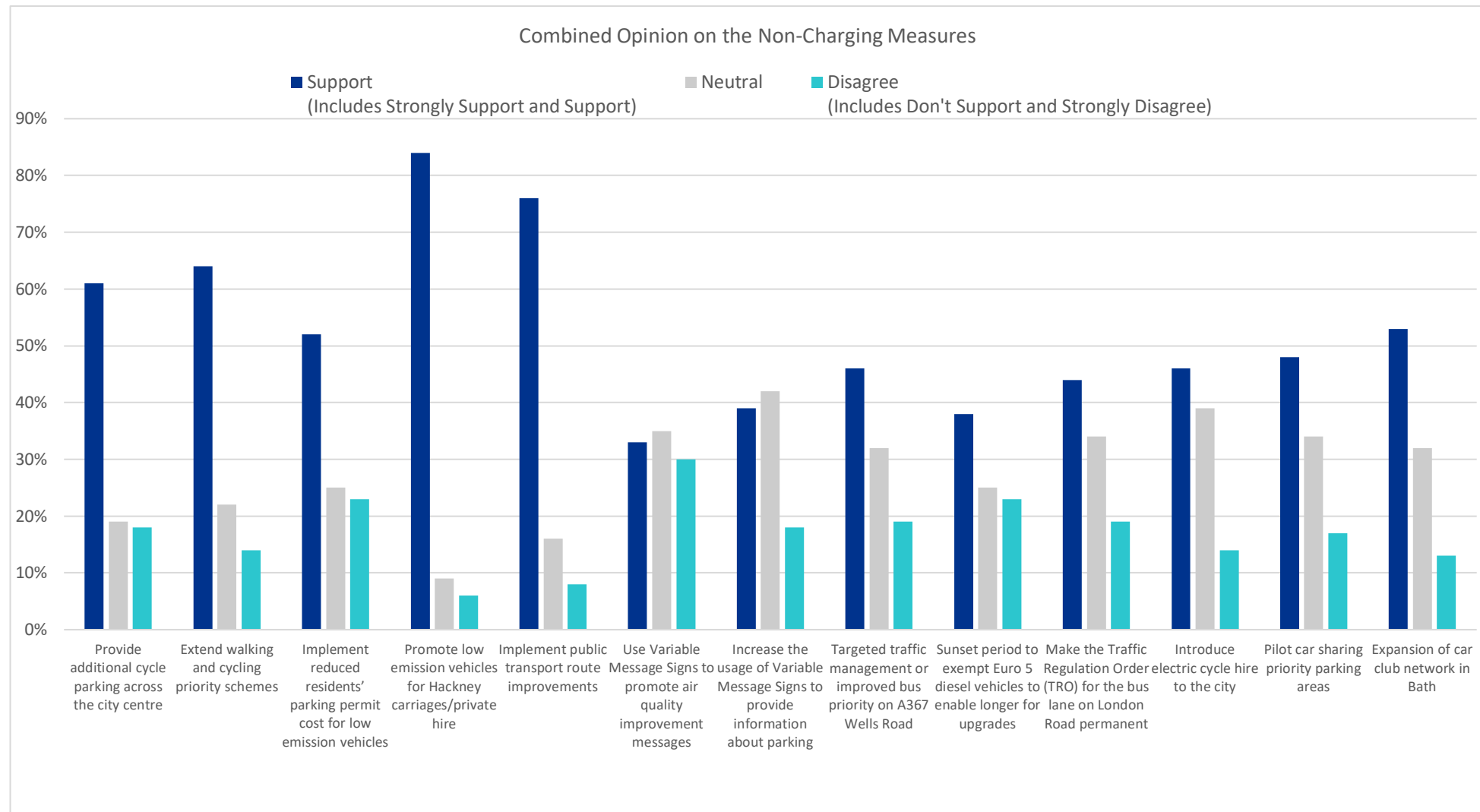
77 responses to Online Survey Q9

Non- Charging Measures	Opinion on the non-charging measure					
	Strongly Support	Support	Neutral	Don't Support	Strongly Disagree	No Response
Provide additional cycle parking across the city centre	36%	25%	19%	14%	4%	1%
Extend walking and cycling priority schemes	43%	21%	22%	9%	5%	0%
Implement reduced residents' parking permit cost for low emission vehicles	23%	29%	25%	10%	13%	0%
Promote low emission vehicles for Hackney carriages/private hire	58%	26%	9%	1%	5%	0%
Implement public transport route improvements	60%	16%	16%	4%	4%	1%
Use Variable Message Signs to promote air quality improvement messages	19%	14%	35%	17%	13%	1%
Increase the usage of Variable Message Signs to provide information about parking	18%	21%	42%	13%	5%	1%
Targeted traffic management or improved bus priority on A367 Wells Road	23%	23%	32%	13%	6%	1%
Sunset period to exempt Euro 5 diesel vehicles to enable longer for upgrades	25%	13%	25%	0%	23%	14%
Make the Traffic Regulation Order (TRO) for the bus lane on London Road permanent	26%	18%	34%	6%	13%	3%
Introduce electric cycle hire to the city	29%	17%	39%	5%	9%	1%
Pilot car sharing priority parking areas	22%	26%	34%	8%	9%	1%
Expansion of car club network in Bath	19%	34%	32%	8%	5%	1%

To provide an overview of the support vs disagreement for the non-charging measures, the bar chart in Figure 7 combines the "Strongly Support" and "Support" opinion and "Don't Support" and "Strongly Disagree" opinions displayed in Table 3. It should be noted that the no responses, which were generally below 3%, are not included within Figure 7. The following key points are observed:

- All non-charging measures were supported by at least 1/3 of respondents
- All non-charging measures were more supported than opposed
- Overall, the non-charging measure which received the most support (84%, combined strongly support and support) was *Promote low emission vehicles for Hackney carriages/private hire*
- *Implement public transport route improvements* was supported by 76% (combined strongly support and support) of respondents
- The non-charging measure which received the least support was the *Use Variable Messaging Signs to promote air quality improvement messages*. However, it should be noted that this still received more support (39% combined strongly support and support) than opposition (18%, combined don't support and strongly disagree).

Figure 7: Combined Opinion Responses to Non-Charging Measures



4. Qualitative Feedback

This Chapter provides an overview of the qualitative feedback gathered from the open text questions of both the online and paper feedback forms, emails and formal responses sent to direct to B&NES, social media comments and comments logged from engagement events and activities. Comments have been categorised into the following themes:

- Strategy
- Socio-economic considerations
- Behaviour change
- Congestion, traffic and parking
- Scheme design
- Other measures
- Technical
- Engagement.

Some sections have been further categorised to account for the high volume of comments.

Rather than generating specific statements of support or objection, the early nature of this engagement (and the presentation of a number of options) meant it generated a lot of questions and concerns. These have served to highlight important areas for consideration in technically assessing the options and what will need to be considered by the Council.

The comments did not often reference a specific type of CAZ or refer explicitly to the three options set out in the SOC. Many refer to the implications of charging cars and are therefore relevant to the Class D CAZ proposal.

Within each section below, responses are provided to show how comments have been taken into account. Where it has not been possible or appropriate to address feedback, a rationale is provided.

It should be noted that the comments in the report were received in response to the presentation of multiple options. The responses were compiled in August 2018 during the work to identify a preferred option and therefore intend to explain how feedback influenced the final proposal.

4.1 Strategy

This section provides an overview of the feedback received concerning overall strategy, including comments on the air quality issue in general terms.

Many respondents were concerned about Bath's current air quality and the associated negative health impacts. There was widespread support for the CAZ proposals because of the Clean Air Plan's potential to:

- Improve air quality
- Improve residents' health
- Increase the uptake of active transport modes and the associated health benefits
- Reduce polluting vehicles within the city centre
- Reduce noise from vehicles
- Initiate a modal shift

- Change behaviours
- Initiate a secondary benefit of traffic and congestion improvements
- Help promote Bath as a destination for ethical tourism
- Create a revenue stream which can be used to improve and support sustainable travel options
- Reduce HGV traffic through the city.

Conversely, some respondents did not feel that a CAZ was necessary or did not understand why it was needed or what benefits it would bring. Others were concerned that enforcement of a CAZ would be difficult. There were some concerns that the Clean Air Plan was "all stick and no carrots" and expressed support for inclusion of behaviour change incentives, whilst others supported a stronger focus on health.

Other comments received about the Strategy included:

Comment / issue / question raised	Response/ how addressed
What is the implementation timeline for a CAZ?	The project plan is provided in OBC-22 in Appendix K. Implementation of infrastructure will commence in May 2019. Scheme operation is planned in late 2020
What option will be decided and how will you choose an option?	Detailed technical assessments, including modelling, has determined that a Class D is required to bring compliance with legal limits in the shortest possible time.
How far ahead is Bath compared to other cities?	In terms of progressing towards the implementation of a CAZ, B&NES is considered to be part of a leading group of Local Authorities, as recognised by central government.
Some respondents commented on the scope of the Clean Air Plan and requested to know whether the CAZ work was part of a bigger plan for Bath. It was suggested that: Any Air Quality Strategy should be delivered in conjunction with other traffic management plans; and The Clean Air Plan is linked more closely to other Council Strategies, policies and departments including: health, highways, active lifestyles, public realm and movement strategy, the parking strategy, plans to expand electric vehicle charging infrastructure and the Bath Transport Strategy.	The Clean Air Plan is focussed on addressing a specific and immediate problem – NO ₂ exceedances. It forms part of a number of strategies for Bath and is a single step in the delivery of these broader aims which the Council is continuing to progress.
Some respondents commented on the contribution of different vehicle classes to air pollution. Respondents stated their opinion on which vehicles were the most polluting, these included: All diesel cars Diesels (prior to Euro 5) HGVs Buses/coaches.	The contribution of different vehicles to NO ₂ pollution varies across the city. Further information about fleet emissions can be found in the OBC-10 in Appendix D. Information on gradient emissions can be found in the OBC-11 in Appendix D.
Will the air quality be improved outside the zone?	It is anticipated that the impacts of the CAZ will have positive impacts to air quality across the city, both inside and outside of the zone through encouraging a modal shift and reduction of non-compliant vehicles.

Comment / issue / question raised	Response/ how addressed
It was noted that it will be a challenge to reduce the number of polluting vehicles entering Bath.	It is anticipated that by 2021 75% of all vehicles will be compliant with the Class D CAZ. The charge for higher polluting vehicles is designed to prompt this behaviour change and to encourage those driving the most polluting vehicles to use compliant or more sustainable, modes of transport. Alongside the CAZ, the Council will be undertaking a wider health campaign working with transport providers, schools and businesses.
There was concern that compliance would not be achieved due to air pollution being spread across the city and the Council's "lack of vision" not creating modal shift. Additionally, there was uncertainty surrounding what happens if compliance is not achieved by 2021.	The Council is working hard to ensure compliance with legal limits is met as this is the best outcome for public health. Non-compliance could result in the Council facing financial penalties.
What if the Council refuses to follow government guidelines and refuses the fines?	The Council recognises and supports the need to reduce air pollution to benefit the health of all those who live/work/visit the city. The Council is working hard to ensure compliance with legal limits is met as this is the best outcome for public health. Non-compliance could result in the Council facing financial penalties.
Concern about the political process and regulations surrounding the process.	The Council is following guidance from central government on the process to ensure that political approvals for the implementation of a CAZ are obtained. The Council is working to ensure that the implementation and operation of the CAZ will achieve best results for the city.
Is it the Council or the Government bringing in the clean air zone policy?	The Council has been mandated by the Government to reduce NO ₂ levels within Bath to legal limits. It has the legal power to implement and enforce a CAZ but requires funding from the Government to do so. The Council is working to ensure that the implementation and operation of the CAZ will achieve best results for the city.
Who makes the decision about CAZ? The Council or WECA? What future role is the WECA Mayor going to take in improving air quality?	The Council has the legal power to implement and enforce a CAZ. The Council meets regularly with WECA keeping them up to date with the Clean Air Plan and enabling them to feed into the project. WECA's Joint Local Transport Plan is expected to be published later this year setting out WECA's strategy related to transport and air quality.
Is there joined up thinking between the Environment and Highways teams?	These two departments work closely together in the Council and are jointly progressing the Clean Air Plan.
Request to learn where to find the list of the 28 Local Authorities mandated and information on their plans.	Please see the National Air Quality Plan ⁹ .
Will there be consistency between the implementation of the Bath and Bristol CAZ charging infrastructure?	There will be consistency across all local authorities implementing a CAZ in terms of signage and other centrally coordinated infrastructure.
How will foreign registered vehicles be enforced?	The Council will work with central government to consider how cross-border enforcement will be carried out.
Concerned that resistance from the general public, local businesses and politicians will make the Clean Air Plan hard to implement.	The Council has been mandated by the government to reduce NO ₂ levels within Bath to legal limits in the shortest time possible. The Council will be working with the community to implement the Scheme in accordance with government guidelines. It is widely accepted by local political parties that improvements to air quality are important for the benefit of public health.

⁹ <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

4.2 Socio-Economic Considerations

This section provides an overview of feedback concerning potential socio-economic impacts of a CAZ including impacts on the economy, tourism and particular groups of society. Comments identify that a CAZ would impact businesses, particularly those who operate LGVs and HGVs. The impact on residents living both inside and outside the CAZ is also highlighted.

Comment / issue / question raised	Response/ how addressed
It was noted that while small businesses clearly have an important responsibility and role to play in reducing air pollution, the pathways to achieving this must be affordable, achievable and proportionate.	The Council recognises that engagement with local businesses is important. The Council looks forward to continuing these conversations and identifying how to assist them in making necessary changes as the Clean Air Plan progresses.
<p>Some respondents felt that a CAZ charging cars would not negatively impact business activity, whilst others were concerned it would result in a loss of livelihood, increase the cost of living and risk of poverty in Bath.</p> <p>There were concerns that a CAZ would negatively impact the local economy through:</p> <ul style="list-style-type: none"> • Fewer cars in the city centre, especially if cars are charged and parking charges increase • Increased delivery costs for businesses relying on deliveries in the city centre • A big operators' monopoly as a result of a CAZ • Fewer visitors to Bath • Other local shopping locations not having a charge • Increased unemployment if business costs rise. 	<p>Economic impacts are assessed in detail as part of the technical work in the OBC. The Council is engaging with local businesses to increase understanding of potential impacts and working with other relevant Council departments. Engagement with local businesses will continue throughout the process of implementation and operation.</p> <p>The Council recognises that potential impacts of a CAZ on the local economy is important. This has been considered alongside the social and health related benefits of improved air quality in the OBC.</p>
<p>There were concerns regarding the impacts on HGV and LGV drivers:</p> <ul style="list-style-type: none"> • Smaller HGV operators will be negatively impacted - they will have to upgrade or pay the charge because retrofitting is not an option • Concern that LGV and HGV drivers will pass on costs to consumers and not upgrade their vehicles • Concern about the economic impact for LGV drivers, due to lifespan of a vehicle and difficulty to provide quotes for workmen. 	<p>The Council is one of twenty-eight local authorities directed to improve air quality. It is therefore anticipated that organisations with a national fleet will respond accordingly.</p> <p>The Council will continue discussions with HGV and LGV drivers via the FTA, RHA and the FOSB.</p>
<p>Comments on tourism:</p> <ul style="list-style-type: none"> • Cars are still necessary for tourism and the economy - the Council should not charge vehicles which support these • Concern that number of tourists will reduce • Concern that the City centre will become "a tourist only place and dead zone". 	<p>Cleaner air will benefit the health of all those who live, work and visit the city. Only those vehicles which are non-compliant with the CAZ will be charged. By 2021, it is forecast from the modelling that 75% of all vehicles in Bath will be compliant and not incur charges in the zone.</p>

Comment / issue / question raised	Response/ how addressed
<p>Some respondents were concerned about impacts of a CAZ in relation to local schools:</p> <ul style="list-style-type: none"> Concern about the increased rat running and therefore air pollution levels near to schools outside the boundary, with particular mention of Widcombe School Concern about the cost to schools of upgrading the bus fleet serving them. 	<p>The benefits of a CAZ will be felt across the city. Cleaner air will benefit the health of all those who live, work and visit the city. The Council is continuing to engage with bus operators and a walk/cycle/scoot to school initiative is considered within the non-charging measures.</p>
<p>There was some concern among respondents that vulnerable groups of society, including the elderly and low-income families, would be disproportionately affected if cars were charged because they are more likely to have non-compliant vehicles and could be unable to pay a charge or upgrade their car. It was felt that this could limit their mobility.</p> <p>There were requests to learn more about available alternatives including options for Bath Spa University students. More specifically, there was concern about the lack of community transport in Newbridge to help the elderly access the shops (Sainsbury's) or the RUH.</p>	<p>As part of the technical work a distributional impact assessment has been conducted to identify specific impacts on vulnerable groups of society. The results from are presented in the OBC. Funding for mitigation of these impacts will be sought from central government where possible.</p> <p>Comments on community transport have been noted by the Council.</p>
<p>There was concern about vehicle upgrades and the potential implications this could have on achieving compliance. These included:</p> <ul style="list-style-type: none"> The affordability of vehicle upgrades The resale value of cars if cars are included in the charge The lifespan of vehicles deterring the want and need for upgrades. 	<p>Stated preference surveys were undertaken to understand the likely local response to various charges. These responses were used in our modelling work which has shown that the suggested charge levels are required to meet the necessary NO₂ improvements. Higher charges would penalise people without additional benefit to air quality and lower charges would result in continued NO₂ breaches.</p> <p>The Council recognise the associated problems of the charge and are engaging with the community to better understand these concerns.</p>
<p>Many respondents had queries concerning the impact on public transport. These included:</p> <ul style="list-style-type: none"> Concern that ticket prices would increase, passing the charge from operators to service users; and Concern that bus services will reduce and worsen due to increased costs. 	<p>The Council has been in continuous dialogue with transport operators. The CAZ is likely to increase use of public transport, which is being taken into account in a Memorandum of Understanding for buses and coaches.</p>
<p>Comments regarding residents:</p> <ul style="list-style-type: none"> A CAZ should demonstrate that resident's health is of greater value than income from business and tourism, currently this is not the case What happens to the people living in Bath who own cars - there are 2,000 car owners within the zone Concern that CAZ will result in onerous restrictions on locals How will you relieve pressures on central Bath residents? How are you working with them? 	<p>Improving public health is the driving factor behind the implementation of a CAZ to improve air quality in Bath. It is forecasted that by 2021 approximately 75% of all vehicles in the city will be compliant and will not incur charges in the zone.</p> <p>The Council is seeking funding to support residents with travel choices to comply with the CAZ. Suggestions on how best to support residents are welcomed.</p>

Comment / issue / question raised	Response/ how addressed
<p>Some comments were received relating to families living in Bath including:</p> <ul style="list-style-type: none"> • Concern about family vehicles being impacted / restricted • Suggestion that further understanding of families and their transport needs is important to make alternatives to car more viable • Wide dispersal of schooling and after-school activities, even within the same families require safe transit methods. 	<p>All trips made by non-compliant vehicles made within the zone will be charged regardless of their final destinations or journey purpose. However, it is recognised that groups have different needs and that compliant modes will not always be a possibility.</p> <p>The Council is investigating how best to support residents with their travel choices to comply with the CAZ, and welcome suggestions. The Council will be seeking government funding to support residents to be compliant.</p>
<p>Some respondents commented on other social aspects of the Clean Air Plan including:</p> <ul style="list-style-type: none"> • Scheme should be logical, viable and beneficial to gain public acceptance • Families, shoppers and the elderly should be allowed to choose their own mode of transport • There is an issue around the social perception of cars, who is driving them and who will be affected. 	<p>The Council agrees the Scheme should be logical, viable and beneficial. This is represented in the Critical Success Factors in the SOC and OBC.</p> <p>The Clean Air Plan encourages a shift from higher polluting vehicles to those that are sustainable and compliant with the Scheme to generate the necessary improvements in public health.</p> <p>The Council recognises that the suitability of a mode varies depending on the people using it or the journey purpose.</p>

4.3 Behaviour Change

This section provides an overview of the feedback received concerning behaviour change and includes comments on encouraging modal shift and uptakes of alternatives to car travel. Generally, there was a range of support for the encouragement of modal shift, change of driver behaviour and promotion of sustainable modes through employers, with some respondents commenting that they would consider alternative modes of transport to get into town if a charging zone were introduced.

Comment / issue / question raised	Response/ how addressed
Further work is needed to educate and support people about available alternatives, such as active travel.	The Council is working to help increase awareness of alternatives and investigating how best to support residents with travel choices to comply with the CAZ.
Incentives to initiate behaviour change are unlikely to be applicable to everyone.	The Council understands this and has been holding tailored engagement events to best understand what can be done to promote the use of less polluting vehicles. The Council is investigating how best to support residents with travel choices to comply with the CAZ.
Concerned about the possible impacts of not "taking the people with you".	The Council has launched an Air Quality awareness campaign and hopes that improving air quality will generate positive feedback, in recognition of the anticipated health benefits to all those who live/work/visit the city.
Concerned that unless HGVs / LGVs / buses are charged businesses will not upgrade their fleets as there will be no business case for them to do so.	Modelling work has concluded that a CAZ D will be required. Therefore, all non-compliant HGVs, LGVs, buses, coaches, taxis, private hires, and car trips within the zone would be charged. Bath is one of 28 local authorities considering implementation of a clean air zone, including Bristol. This should create a strong case for businesses with non-compliant vehicles to upgrade their fleet.
Over time people will upgrade to cleaner vehicles and the air quality will improve.	In line with the government guidance the Council is working to reduce air pollution to legal limits in the shortest possible time and by 2021 at the latest.
Some respondents reported being open to cycling instead of driving. However, they felt that cycling in Bath is currently not safe, Bath is frightening to cycle around and feel cycling is restricted due to hills.	Cycling improvements are considered within the Clean Air Fund / revenue measures. The Council is continuing to support the development of cycle infrastructure through its wider transport strategy.
Some respondents were concerned about encouragement of modal shift for school traffic. It was suggested that reduced traffic is needed to allow children to walk/cycle to school safely and help behaviour change. For example, the overall 'rat run' from the A46 at Upper Swainswick to Camden Road involves traffic passing alongside three schools entrances and perimeters with narrow pavements.	The aim of this project is to improve air quality. Whilst that might alleviate congestion in some areas, this is not the focus of the Clean Air Plan. The Council is continuing to address congestion and improvements to travel via active modes as part of its wider transport strategy and continues to work with schools.
Some respondents expressed scepticism that the whole car fleet travelling within the CAZ will be replaced by 2020.	It is not anticipated that the entire car fleet will be replaced by 2020. Compliance with legal limits must be achieved by 2021 at the latest. To reach these challenging timescales it is necessary for the vehicle fleet in Bath to be less polluting. It is anticipated

Comment / issue / question raised	Response/ how addressed
	that approximately 75% of all vehicles driving within the CAZ will be compliant by 2021.
How will the Council ensure that behaviour change is long lasting and not temporary?	The Clean Air Plan will continue until the Council is certain that the improvement to air quality is sustainable. The Clean Air Plan will be supplemented by a range of other measures to encourage behaviour change, as part of the Council's wider work on sustainable transport.
Concerned that the charge will not deter polluting vehicles including HGVs and resident car drivers from driving within the CAZ, especially if residents are offered a discount.	<p>The Council has undertaken detailed modelling to determine the most appropriate charge for each vehicle class. The proposed charge set out in the OBC has been set at a level to deliver the necessary air quality improvements.</p> <p>In addition to national exemptions, the Council is considering local concessions and mitigations. Information on exemptions and concessions can be found in OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC.</p>

4.4 Congestion, Traffic and Parking

This section provides an overview of comments received concerning congestion, traffic and parking in Bath. Overall there was some concern about how a CAZ would work alongside existing and proposed parking restrictions and charges within the City.

Comment / issue / question raised	Response/ how addressed
<p>Multiple respondents suggested reviewing residents parking operation. Suggestions included:</p> <ul style="list-style-type: none"> • Base the permit price on emissions rather than a flat fee • Extend the Residents Parking Zones (RPZs) • Require parking permits on Sundays Align RPZs to the CAZ boundary – request to look at co-terminus boundaries and charging to fit with the parking charge changes • Review free parking after certain hours • Add the charge to the permit price. 	<p>The Council has applied for funding to be able to offer residents driving ultra low-emission vehicles (ULEV) a parking permit discount. This will encourage the uptake of ULEV within the CAZ.</p> <p>A separate review of RPZ is happening under the Council's Parking Strategy but can't be completed within the timescales for this Clean Air project because of the considerable RPZ consultation period required.</p>
<p>Respondents suggested that parking had a role to play in addressing air quality. Comments included:</p> <ul style="list-style-type: none"> • Move all parking to out of town • Parking control must be implemented alongside the CAZ • Only allow new build hotels with underground parking and promote as a priority those with parking spaces • Allocate free student parking at the universities • A few respondents suggested increasing parking charges and/or reducing parking in the city centre would have a more immediate air quality impact than a charge • The high usage of cars in Bath is due to inadequate parking • Concern that a CAZ will force parking onto residential streets outside of the zone boundary (specifically Larkhall) • Concerned that the newly strengthened parking policies will encourage short term parking in the city centre • Increase parking to more than the Park and Ride. 	<p>The Council recognises the important role that parking plays in car usage. However, the Clean Air Plan is primarily focused on improving air quality for the benefit of public health. A CAZ is designed to create a cleaner fleet and not to tackle the number of vehicles on the road.</p> <p>There is parking available at park and ride sites (out of town) and the Council is looking at extending its hours as part of the Clean Air Plan. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for further details.</p> <p>Looking at parking policy for future developments will not change the level of air pollution that Bath now experiences.</p>

Comment / issue / question raised	Response/ how addressed
<p>Some respondents commented on traffic in Bath, specifically:</p> <ul style="list-style-type: none"> Through traffic should not be driving through Bath Traffic should be reduced to preserve the history and beauty of Bath Traffic flow improvements needed along the London Road - Pulteney Road - Widcombe – Wellsway route to prevent traffic travelling through the city centre (Queen Square) Improving the slow traffic flow should be a higher priority Overpopulation of students is the main cause of traffic problems in Bath Concern about current levels of traffic at London Road and Bathwick Street travelling to the A36 Concern about the current levels of HGVs on George Street and Upper Oldfield Road One advantage may be to encourage HGVs to find an alternative route but until that route exists any scheme is likely to fail. 	<p>The Council recognises that traffic in Bath is a concern for many. This is addressed as part of the wider Transport Strategy for Bath.</p> <p>The aim of the project is to reduce pollution in Bath as quickly as possible. The only option that will achieve this is a Class D CAZ.</p>
<p>Will additional parking be provided outside of the zone, particularly if a Class D CAZ is chosen?</p>	<p>Parking is reviewed under B&NES Parking Strategy and is outside the remit of this study. Objective PSO 10 of the Parking Strategy states “The number of public off-street parking spaces in Bath will be maintained at the current levels or below.”</p>
<p>Reduce the oversupply of taxi drivers which results in congestion for other road users</p>	<p>The Council considers that taxis play a vital role in the available public transport network in Bath. They enable immediate and flexible transport options for all users, especially in areas not reached by conventional bus or rail services and for users with mobility impairments. The Council is reviewing its taxi policy to ensure that all vehicles are compliant with the terms of the CAZ.</p>
<p>A number of respondents had comments surrounding congestion:</p> <ul style="list-style-type: none"> Concern about congestion at the Rossitor Road Roundabout, Corn Street A367 junction and London Road through Odd Down Lower Bristol Road Concern that a CAZ will not reduce congestion, but the public perception is that it will, which could lead to disappointment Concern that a CAZ will not reduce congestion because it hasn't worked in London and will only result in the conversion of vehicles to compliant ones Why isn't congestion considered in the objectives table and can congestion be included in the plans going forward View that there would clearly be less congestion if private vehicles were included in the CAZ option Concern that raising the parking fees, as recently set out by the Council, and implementing a congestion charge is not the solution Requiring cars to be Euro 4/6 compliant will not reduce congestion. 	<p>Reducing congestion is not the main objective of this Clean Air Plan. It is possible that in some areas congestion may improve as a secondary benefit of CAZ implementation. The Council recognises that congestion is a concern in Bath and this issue is covered by wider transport strategies of the Council.</p>

4.5 Scheme Design

Many respondents commented on scheme design. The sections included within this chapter have been categorised, to help with presentation of information, as follows:

- Boundary
- Charge operation
- Diversionary impacts
- Scheme alternatives
- Scheme finance
- Other

4.5.1 Boundary

This section provides an overview of comments received concerning the boundary of the CAZ. Some respondents felt the boundary was too small and requested a more ambitious plan covering the whole city, but there was also support for the existing boundary.

Comment / issue / question raised	Response/ how addressed
Some respondents were unclear about the boundary of the proposed CAZ, if it was confirmed and whether it included the purple sections.	The boundary was not confirmed in the SOC but for the purpose of the technical modelling had to be provisionally set out. One boundary was published for the small zone in the SOC. After publication some changes were made extending the boundary, shown in engagement materials in purple. The boundary has further evolved, and an updated boundary is provided in the OBC.
Comments about the effectiveness of the proposed CAZ boundary included: <ul style="list-style-type: none"> • A larger zone would benefit more people • Most polluted parts of the city are excluded • Boundary leaves out densely populated areas - why? 	The benefits of the CAZ are not just felt within the CAZ area itself but diffuse across the city. Initial modelling work showed the proposed zone boundary could bring compliance across the city whilst impacting the smallest number of residents and local businesses. The proposed boundary is set out in the OBC.
Buses and coaches will use the roundabout by Pulteney Bridge to drop off and turn around to avoid zone.	The Council continues to liaise with operators to understand the likely impact of a CAZ on their operations.
If Cleveland Bridge is included, only a class B is feasible to ensure the toll bridge route is not impacted	The class of CAZ has been determined through modelling and consideration of which CAZ type would achieve compliance in the shortest time possible. Clevedon Bridge is included in the CAZ area modelled. It is anticipated that 75% of all vehicles will be compliant by 2021 and modelling does not show significant impact on the toll bridge. The Council will monitor impacts post Scheme implementation.

Comment / issue / question raised	Response/ how addressed
<p>Many respondents commented on the details of the proposed CAZ boundary included in the SOC</p> <p>Respondents commented that the CAZ boundary should be extended to include:</p> <ul style="list-style-type: none"> • Bathampton and the University to capture commuters travelling from the East • Bear Flat • Bathwick St and related streets • Greenway Lane • London Rd • Widcombe infant and junior schools • Oldfield Park • Windsor Bridge; • White Hart Junction in Widcombe • Upper Bristol Road • Pulteney Road • East of Brompton Hayes • East (A36) • Junctions off Wells Road and Wellsway • B3111 • A367 • Brompton Hayes junction <p>Respondents commented that the boundary should not include:</p> <ul style="list-style-type: none"> • Bristol Rd • London Rd • A36 • A roads <p>B3111 Brougham Hayes intersection must remain in the CAZ.</p>	<p>These suggestions have been considered in the development of the OBC. The location of the CAZ boundary is determined through thorough technical modelling and design and is dependent on many factors including ANPR camera placement, signage locations, turning opportunities, traffic modelling and economic and social impacts.</p> <p>An updated version of the CAZ boundary is included in the OBC. OBC-4 'Clean Air Zone Boundary Updates' within Appendix A of this OBC, provides a detailed description of how the boundary has been determined.</p>
<p>Boundary should be the smallest area that will achieve compliance</p>	<p>The benefits of the CAZ are not just felt within the CAZ but diffuse across the city. Initial modelling work showed the proposed zone boundary could bring compliance whilst impacting the smallest number of residents and local businesses.</p> <p>The location of the CAZ boundary, as set out in the OBC, has been determined through thorough technical modelling and consideration of many factors including ANPR camera placement, traffic modelling and economic and social impacts.</p>
<p>There will be no through route for LGVs.</p>	<p>Only non-compliant vehicles would be charged to drive through the City.</p>

4.5.2 Charge Operation

This section provides an overview of comments received in relation to charging. This includes comments about which vehicles should be charged, charge level and impact to certain journeys. There was a spread of opinion about which vehicle classes should be charged. A number of comments were received in support of each of the three different charging options and many did not state a preference. Some respondents felt that cars should not be charged, whilst others welcomed the inclusion of cars.

Comment / issue / question raised	Response/ how addressed
<p>Many respondents commented on who/what should be charged/not charged. Comments included:</p> <ul style="list-style-type: none"> • All diesels should be charged with no exemptions • All polluting vehicles should be treated the same • All vehicles should be charged except electric ones • Tourists rather than locals who travel to work should be charged • Only commuters living outside of the city should be charged • Shouldn't charge petrol vehicles as they contribute very little to the NOx emissions • Coaches should be charged • Support of charging HGVs and LGVs • Charge should apply to buses and trains • HGV members will be affected by all options but have legitimate reasons to come into the city centre so should not be charged • Buses should not be charged before cars because they carry more people. 	<p>The Council is following government guidance for the Euro Standard of vehicles included in a CAZ as per the CAZ framework¹⁰. The type of CAZ (A/B/C/D) is determined through detailed technical modelling work to find the option that brings compliance with legal limits in the shortest possible time. It should be noted that electric vehicles are exempt in all classes.</p> <p>All trips made by non-compliant vehicles will be treated the same, regardless of whether drivers are tourists, commuters or others.</p> <p>Trains are not included in this study as the government direction was to address NO₂ pollution from road traffic. Trains are considered as part of the Council's wider Transport Strategy for Bath.</p>
<p>Concerned that if you live in the zone you'll be charged to leave your house / undertake daily tasks (recycling / school runs / shops / leisure / work / RUH)</p>	<p>All trips made by non-compliant vehicles within the zone will be charged. This is to ensure that the health benefits of cleaner air are realised by all those who live, work or visit the city. The Council will be engaging with residents within the zone to understand how the Council can best support them.</p>
<p>The CAZ is a tax on through traffic on the A36.</p>	<p>The CAZ is designed to reduce air pollution in the shortest possible time. All trips within the CAZ made by non-compliant vehicles would be charged regardless of the final destination. This is to ensure the maximum health benefits associated with improved air quality are realised.</p>
<p>Some residents had comments on what a CAZ D would mean for them if selected:</p> <ul style="list-style-type: none"> • How does it work for residents living in the zone? • Will the charge be lower for residents? • What will the charge mean for visitors to residents? 	<p>All trips made by non-compliant vehicles within and through the CAZ will be charged.</p> <p>The Council is exploring ways to encourage residents to switch to less polluting modes of transport and investigating how best to support residents with adjusting their travel choices to comply with the CAZ. Exemptions can only be granted if they do not change the year in which compliance can be achieved.</p>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612592/clean-air-zone-framework.pdf

Comment / issue / question raised	Response/ how addressed
<p>Some respondents had comments on the charging system:</p> <ul style="list-style-type: none"> How will journeys within the CAZ be charged; Government should ensure there is a single, business vehicle registration system for all charging schemes across the UK Charging system must be easy for visitors to use. 	<p>Automatic Number Plate Recognition (ANPR) Cameras would read vehicles number plates to determine if they are compliant. Charging infrastructure has not yet been decided.</p>
<p>What time will the charge operate? How many charges will there be within 24 hours? Will you be charged to leave the zone if you parked in it the previous day?</p>	<p>Charges will operate once in a 24-hour period. Any trips made by non-compliant vehicles within the CAZ in a new 24 hr period would be charged.</p>
<p>How will the charge affect those with irregular / night shifts? Can there be a peak charge rather than a 24-hour charge?</p>	<p>Charges will operate on a 24-hr basis. Any trips made by non-compliant vehicles within the CAZ in a new 24 hr period would be charged.</p>
<p>Concern that a CAZ would negatively impact school bus contracts.</p>	<p>The Council is continuing to work with transport operators to find ways for them to continue to operate whilst having the maximum impact on improving air quality.</p>
<p>Will council staff have to pay the charge?</p>	<p>Any trips made by non-compliant vehicles within the zone would be charged.</p>
<p>If a non-compliant car travelled from Bristol to Bath in one day could it be charged twice as both cities are looking to have Clean Air Zones?</p>	<p>Any non-compliant vehicle will be charged to drive through the CAZ in both Bristol and Bath.</p>
<p>Could Bath adopt London's precedent of Congestion, T-Charge and Ultra Low Emission Zone charges for non-compliant private cars, including a 3 year 'sunset' period.</p>	<p>London has set these charges in relation to the Low Emission Zone and the upcoming Ultra Low Emission Zone. The Council is implementing a CAZ which has different guidelines, regulations and legal directions which includes the requirement to reduce NO₂ in the shortest time possible.</p> <p>The Council has undertaken detailed technical assessment to determine the CAZ type and charge level needed to create the change in behaviour required to sufficiently reduce NO₂ levels. A 3-year sunset period would not help the Council comply in the shortest possible time.</p>
<p>Strongly opposed to the inclusion of motorcycles within a Class D option as most are not diesel, and neither are diesel motorcycles mass produced.</p>	<p>Within the preferred scheme for a Class D CAZ motorbikes would be exempt.</p>
<p>What will the charge be / how will this be determined? Charges should be high enough to deter non-compliant vehicles.</p>	<p>Following detailed technical assessment to determine the charge level needed to create enough behaviour change to enable sufficient reduction in NO₂ levels, the following charges have been proposed:</p> <ul style="list-style-type: none"> £9 for light vehicles and £100 for heavy vehicles. <p>Further information on this can be found in OBC-16 'Response Rates Technical Note' in Appendix E and OBC-30 'Stated Preference Survey' in Appendix L of this OBC.</p>

Comment / issue / question raised	Response/ how addressed
What type of vehicles would be affected?	Modelling work has demonstrated that a CAZ Class D should be implemented to achieve compliance in the shortest time possible. This includes charging all petrol cars older than Euro 4 and diesels older than Euro 6.
Where do petrol hybrids fit in to the CAZ classes?	Hybrids are not exempt in Government CAZ framework guidance. However, a hybrid exemption is under consideration. It should be noted that exemptions can only be granted if modelling work shows they don't change the year in which compliance can be achieved.
<p>People expressed concern that journeys they regularly make would result in a charge if a Class D CAZ was applied, including:</p> <ul style="list-style-type: none"> • South to North across the city • Access to car parks • Trips to RUH • Warminster Road / Bathampton - north of the city • Combe Down – Bathampton • Access to the M4 (unless via Weston) • Midsomer Norton - M4 • Going across the city (to Larkhall) • Leaving Stothert Avenue (Bath Western Riverside) • Charlcombe Lane and Weston Lane • East to West • Bath to Chippenham • Bathampton to the city centre • Marksbury to Batheaston. 	<p>Any trips made by non-compliant vehicles within the zone will be charged. This is to ensure that the health benefits of cleaner air are realised for all those who live, work or visit the city.</p>
Don't implement a congestion charge when there is no alternative road for HGVs to take	<p>The Council is implementing a CAZ rather than a congestion charge which is aimed at changing the fleet compositions. In conjunction with other CAZs nationally, it should prompt a transition to less polluting vehicles. However, it will not prevent all non-compliant HGVs from driving through the CAZ.</p> <p>It is forecasted that by 2021, 27% of rigid HGVs, 12% of artic HGVs and 22% of other types of HGVs within Bath will be non-compliant.</p>

4.5.3 Diversionary Impacts

This section provides an overview of comments regarding diversionary impacts of a Clean Air Zone.

The map in Figure 8 shows the areas identified throughout this engagement period as potential rat runs and areas where respondents were concerned about increased congestion.

Many respondents were concerned about diversionary impacts of a CAZ. The risk of rat running, and increased congestion were concerns raised multiple times. Figure 8 also shows the rat runs identified in the engagement comments plus additional potential rat runs identified by the traffic team alongside the location of existing and newly added diffusion tube pollution monitoring sites.

These new sites have been added in response to concerns raised throughout the engagement period. The Council continues to analyse potential diversionary impacts.

It should be noted that the final boundary location is determined through technical modelling and is dependent on many factors including ANPR camera placement, traffic modelling and economic and social impacts.

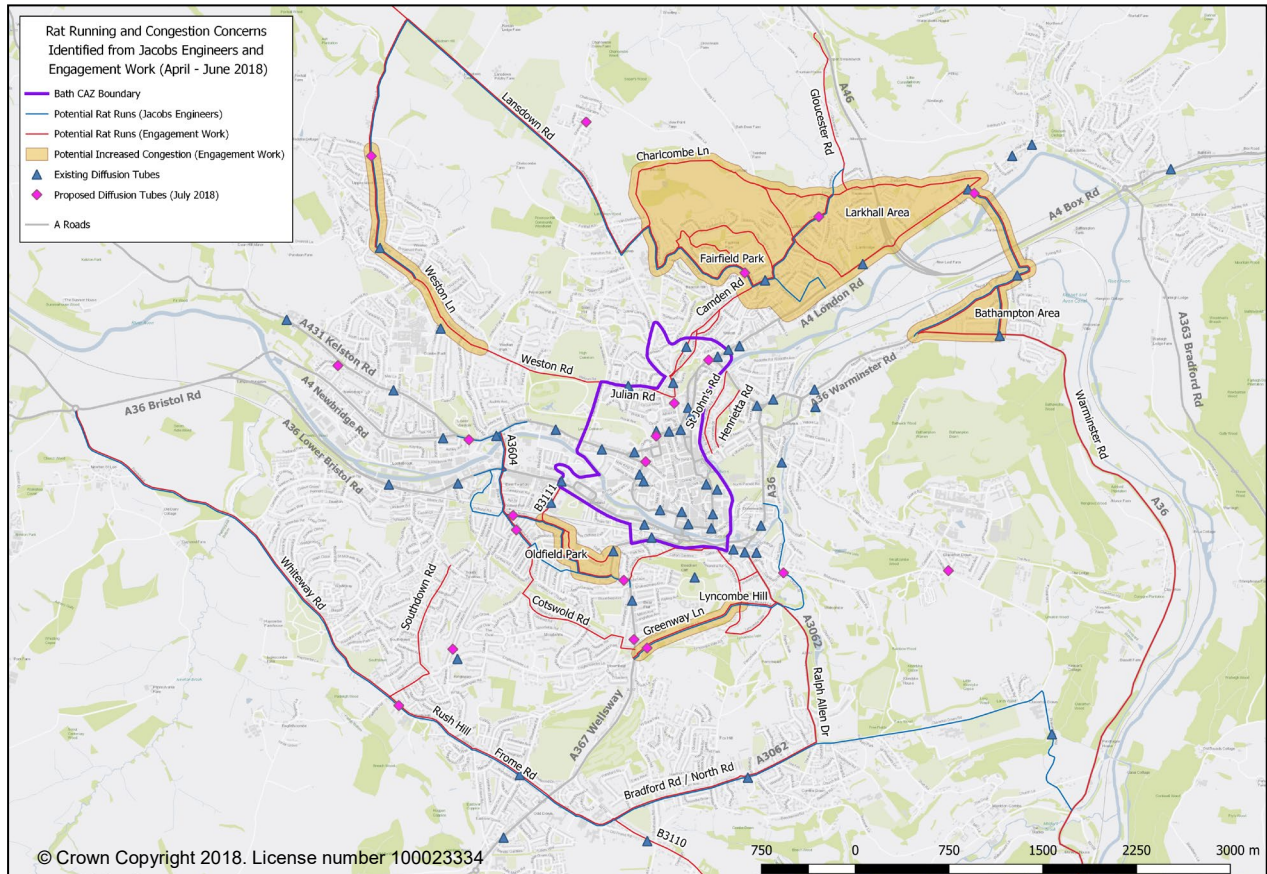


Figure 8: Map of rat run and congestion concerns

Comment / issue / question raised	Response/ how addressed
<p>There were some comments on the impact to residential areas, including:</p> <ul style="list-style-type: none"> Concern about increased volumes of traffic in residential areas trying to avoid the CAZ Signs to prevent attempts to rat runs through resident's lanes will be required (Fairfield junction was a suggested location for this) Will there be compensatory measures to mitigate pollution caused by rat running / excess traffic through the southern part of Bath? 	<p>The Council understands residents' concerns about the impact of a CAZ on residential areas outside the zone.</p> <p>The technical team analysed potential rat runs as areas of concern and identified other potential routes. These areas are shown in Figure 8.</p> <p>Modelling work predicts very minor increases in traffic with decreases in some locations. There is no predicted increase in NO₂ concentrations. In response to the analysis extra diffusion tubes have been deployed to monitor areas not already covered by existing infrastructure. The zone boundary has also been modified where possible.</p>

Comment / issue / question raised	Response/ how addressed
<p>The CAZ may have positive impacts on routes outside of the zone:</p> <ul style="list-style-type: none"> Camden Road (if western end of Camden Road and Hedgemoor system is within the boundary) Belgrave Crescent. <p>Potential rat runs could be reduced if traffic is improved on London Road.</p>	<p>The Council is anticipating that the impacts of the CAZ will have many positive impacts across the city, both inside and outside of the zone. Through encouraging a modal shift and reduction of non-compliant vehicles, the benefits should be wide-reaching. There is also potential that a CAZ will bring secondary traffic and congestion related benefits; however, these are not guaranteed and are not the primary aim of the project.</p>
<p>Have the impacts on Newbridge / Lansdown been considered?</p>	<p>The transport model used in the technical work covers the whole city and beyond. The model can forecast how people will change their routes. What is expected is an improvement in air quality across the entire city regardless of whether it is inside or outside the zone.</p>
<p>Concerned about the safety implications of increased traffic in Bathampton and would like further data collection on the toll bridge. What data is there for the toll bridge?</p>	<p>The toll bridge can only be used by cars, LGVs and taxis. We anticipate 75% of all vehicles will be compliant by 2021 and modelling does not show significant impact on the toll bridge. The Council will monitor impacts post Scheme implementation.</p>
<p>How are the impacts to Bathampton being assessed?</p>	<p>All potential diversionary impacts are assessed by the technical team. The models used include assessment of Bath and a wider area, ensuring Bathampton is included in assessment work. Further information on this is in the OBC.</p>
<p>The through traffic and road closure considerations aren't included within the previous report, will these be included in the OBC?</p>	<p>There are none proposed in the OBC. Some amendments to the boundary to prevent rat running have been made. Additionally, the modelled change in traffic levels shows expected changes to be low.</p>
<p>Concern that traffic will be rerouted away from Bath and concern about the long-distance diversions that may be caused by a CAZ. Concern about the amount of fuel used to avoid the zone.</p>	<p>Diversion of traffic and avoidance of the zone is not the aim of the CAZ. It is hoped that a CAZ will create modal shift, meaning vehicles driven within the zone and wider area are less polluting. The impact of increased fuel usage has been considered in the technical analysis.</p>
<p>Rat running traffic may make it harder and more dangerous for pedestrians and cyclists</p>	<p>The Council continues to support the development of improved infrastructure through its wider transport strategy and through the Clean Air Fund / revenue measures in OBC-08 'Option Assessment Report', Appendix C of this OBC.</p>
<p>Can vehicles be directed along specific routes to prevent rat running?</p>	<p>Traffic management was considered as part of scheme design; however, modelling does not anticipate any significant issues. It is recognised that diversionary impacts are a concern for many residents and the Council is working to minimise impacts as far as possible and will continue to monitor post Scheme implementation.</p>
<p>How will you stop people from making wrong turns and driving down crescents / London Rd?</p>	<p>The location of the boundary has been carefully considered including suitable turning opportunities for vehicles not wanting to enter the CAZ. The Council is working to ensure sign placement reduces the risk of diversions.</p>

Comment / issue / question raised	Response/ how addressed
<p>Suggestions to minimise diversionary impacts included preventing traffic from diverting:</p> <ul style="list-style-type: none"> On the A36 South of Bath (West Wilts to Bristol) On Brook Road from A36. 	<p>The transport model covers Bath and the wider area and includes potential diversionary impacts. The benefits of improved air quality will be seen beyond the area included within the zone. Conversations with other local authorities will continue as the project progresses.</p>
<p>Can the impacts of the CAZ on the Bathampton toll bridge be monitored after implementation?</p>	<p>As shown in Figure 8, it has been proposed that diffusion tubes are placed to the north of Bathampton toll bridge to allow for monitoring of the air quality in that location.</p> <p>It is anticipated that 75% of all vehicles will be compliant by 2021 and modelling does not show significant impact on the toll bridge. The Council will monitor impacts post Scheme implementation.</p>
<p>Concern regarding non-compliant HGV's impacting arterial routes (A36)</p>	<p>The CAZ will improve the number of compliant vehicles travelling into / out of Bath and therefore air quality on the arterial routes is predicted to improve.</p>
<p>Concerned about the impact to the A350</p>	<p>The impact of traffic rerouting is assessed within the traffic modelling work. Discussion with Highways England and Wiltshire Council about potential impacts is ongoing. It is expected that there will be some air quality benefits seen on these routes through upgrading of the vehicle fleet in the wider area.</p>

4.5.4 Exemptions

This section includes an overview of the comments received concerning exemptions from the CAZ. Including suggestions/ideas and queries about implementation.

Comment / issue / question raised	Response/ how addressed
<p>What cars will be exempt?</p>	<p>Euro 4 petrol (approx. 2006 or newer) and Euro 6 Diesel (approx. 2016 or newer) would be exempt. This is based on Government guidance in CAZ framework.</p>
<p>Will buses be exempt? How will bus exemptions work as there are no bus operators based in Bath?</p>	<p>Buses will not be exempt because they contribute to the air quality problem seen in Bath. Conversations with these transport operators will continue to find ways for them to continue to operate whilst having the maximum impact to air quality. The agreements from these conversations are in a Memorandum of Understanding appended to the OBC. Exemptions can only be granted if modelling work shows they don't change the year in which compliance can be achieved.</p>
<p>Will classic / vintage vehicles be exempt?</p>	<p>Vehicles with a 'historic' vehicle tax class will be exempt following national exemptions provided by central government in the Clean Air Framework¹¹</p>

¹¹ Defra & DfT (May 2017) Clean Air Zone Framework: Principles for setting up Clean Air Zones in England.
<https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england>

Comment / issue / question raised	Response/ how addressed
Concern that exemptions will decrease the effectiveness of a CAZ	Exemptions can only be granted if modelling work shows they don't change the year in which compliance can be achieved and therefore don't change the health benefits associated with a CAZ.
Are doctors / teachers/ essential trades & services etc. expected to pay the charges?	Exemptions are considered within the Technical Note OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC. Locally agreed concessions and mitigations have not been determined. Following the MOU, there will be a temporary exemption for emergency services, please see OBC-46 'MOU for Emergency Service Vehicles', Appendix V of this OBC.
Comments on exemptions for disabled drivers: <ul style="list-style-type: none"> Blue badge holders shouldn't be exempt Exemptions for cars with disabled tax exemptions is not sufficient and will marginalise disabled people who do not qualify for this exemption. 	<p>This suggestion has been considered within the Technical Note OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC.</p> <p>Following national guidance, cars within the disabled passenger vehicle tax class will be exempt from the charge. Locally agreed concessions and mitigations have not been determined however, the possibility of concessions for blue badge holders is being looked at.</p> <p>Local exemptions/concessions can only be granted if they don't change the year in which compliance can be achieved.</p>
What is the process for exemption decisions?	The Council is following government guidance on non-compliant vehicles that are automatically exempt. Other exemptions/concessions can only be granted if modelling work shows they don't change the year in which compliance can be achieved. Please see OBC-05 'System Design Features and Payment Exemptions' for within Appendix A of this OBC.
Principle access roads should not be included with in the CAZ area/should be free of charge.	This would work against the aims of this Scheme, which is to improve air quality in the shortest possible time. Access roads bring traffic into and out of Bath and are some of the most polluted areas in Bath (e.g. London Rd, Wells Rd). Therefore, trips by polluting vehicles made on these roads should be captured to enable legal requirements to be met and improve the health of all those who live, work or visit the city.
Bus, taxi and trucking companies should not be exempt.	They are not exempt because they contribute to the air quality problem in Bath.
Residents should not be charged. If cars are charged, then locals should be given: <ul style="list-style-type: none"> Free bus passes Free parking (up to 4 hours). 	<p>The aim of the CAZ is to reduce air pollution therefore improving the health of those who live / work / visit Bath. 75% of all vehicles driving through the CAZ in Bath are anticipated to be compliant by 2021.</p> <p>The Council is considering a range of non-charging measures as part of this Scheme. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for further details.</p>

Comment / issue / question raised	Response/ how addressed
Should charge pre- Euro 5 diesels not pre- Euro 6. Emissions vary with manufacturer. Difference in emissions between a Euro 5 diesel and a Euro 6 diesel is minimal. Own a car which is main dealer serviced and kept in good condition. With the new stringent MOT diesel regulations coming into force next month Euro 5 diesels should be exempt.	The Council is following the Government's CAZ guidelines on which emission standard vehicles are exempt from the charge. Please see page 16 (Figure 6) of the National Air Quality Plan for a comparison of emissions of NOx for different car Euro standards, by emission limit and real-world performance. This figure demonstrates the difference between Euro 5 and Euro 6 diesels.
There was various support for a sunset period (a temporary exemption to allow time for upgrades) for: <ul style="list-style-type: none"> • Euro 5 diesel cars for their serviceable life or until compensation is available • Residents and BA postcodes • HGVs • Infrequent car using residents • Care / support workers • Taxi drivers. 	Exemptions/concessions can only be granted if modelling work shows they don't change the year in which compliance can be achieved. Please see the technical note in the appendices of the OBC which considers the exemptions suggested in the CAZ framework.
Suggestion that exemptions should be: <ul style="list-style-type: none"> • Via credits; and • A fixed number of days. 	The process for administering exemptions is considered in the OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC.
Proposal for a 90% discount for residents within and adjacent to the CAZ as in London	Locally agreed concessions (additional exemptions) must not alter the year that compliance is achieved. A concession of this scale would delay compliance and is therefore not suitable. The process for administering exemptions is considered in the OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC.
Exemptions should be considered for: <ul style="list-style-type: none"> • Residents (for a fixed number of days) • Tax paying residents • Hybrids • Low income households • Mental and physical disabilities (blue badge holders) • Health workers • Ambulances • Essential workers (doctors & junior doctors, nurses, teachers, GPs) • Taxi drivers licenced by B&NES • Wedding cars (two per service) • Cars under 1600cc • Electric vehicles • Motorbikes / Scooters • School buses. 	Exemptions can only be granted if modelling work shows they don't change the year in which compliance can be achieved. The process for administering exemptions is considered in the OBC-05 'System Design Features and Payment Exemptions' within Appendix A of this OBC. As per the Government framework, electric vehicles and motorbikes will be exempt from all charging options.

4.5.5 Scheme Alternatives

This section includes an overview of comments on suggested Scheme alternatives. This included many large-scale infrastructure projects and traffic management measures. Many of these suggestions were outside of the scope of the Clean Air Plan and CAZ implementation, but have been retained by the Council for wider consideration as part of their ongoing planning for travel and transport.

Comment / issue / question raised	Response/ how addressed
<p>Scheme alternatives suggested included:</p> <ul style="list-style-type: none"> Cars should be banned from the city / city centre pedestrianised An electric only zone Saltford is worse and requires a bypass A relief road / infrastructure should be built for the heaviest polluters (larger vehicles) Have a low emission zone, doesn't need to have all the technical infrastructure like London – think outside the box Suggest an emergency CAZ on London road and Bathwick Street to include residential streets in North Camden Restrict roads by vehicle type Implement non-charging measures early Previously a tunnel was considered under Bath (1970s); Class B should be implemented immediately with Class D implemented afterwards Suggestions to implement a low emission zone at: <ul style="list-style-type: none"> The bus station; The hospital; and Universities. 	<p>Implementation of a CAZ is based on Government guidance. Legally, compliance must be achieved in the shortest possible time which rules out many scheme alternatives. Any large infrastructure scheme cannot be delivered within the timescales of this Scheme.</p> <p>No Scheme can be implemented without due consideration of potential impacts and detailed planning of deliverability. Consideration of these factors by central Government and local modelling work has determined that a CAZ is the quickest way to achieve compliance with legal limits in Bath.</p>
Some respondents suggested the Council could learn from other cities, countries e.g. Copenhagen, Perth, Riga.	A CAZ has been recommended by central Government as an effective and fast way to improve vehicle emissions from road traffic in the United Kingdom.
Is a congestion charge rather than a CAZ possible so that everybody has to contribute?	A congestion charge does not differentiate between pollution levels of different vehicles. This is necessary to improve air quality. Only the most polluting vehicles will be discouraged from entering the CAZ. Congestion is addressed as part of the wider transport strategy for Bath.
Some respondents noted that they would prefer a congestion zone or traffic management measures such as traffic lights, lane narrowing and one-way system over a CAZ	Traffic management measures alone would not improve air quality in Bath by a sufficient amount to enable compliance with legal limits in the shortest time possible.

4.5.6 Scheme Finance

This section includes comments concerning Scheme finance. During the engagement respondents raised questions about how the implementation of a CAZ would be funded and how any revenue generated would be used.

Comment / issue / question raised	Response/ how addressed
<p>Some respondents were concerned about revenue generation from a CAZ. Comments included:</p> <ul style="list-style-type: none"> • What happens to the revenue from a CAZ • The Scheme should aim for no revenue / profit • Concerned that a CAZ is a method for generating additional revenue for B&NES • Feels the Scheme is raising taxes. 	<p>The aim of the CAZ is not to generate revenue/raise taxes but to reduce NO₂ pollution in the shortest possible time. However, any revenue generated will be used to run the Scheme and any extra will be invested into measures that encourage use of greener modes of travel and further air quality improvements.</p> <p>Section 3.10 point 160 in the CAZ Framework states "Local authorities should not set the level of charge as a revenue raising measure. The Transport Act 2000 requires any excess revenue that may arise from charges above the costs of operation to be re-invested to facilitate the achievement of local transport policies and these should aim to improve air quality and support the delivery of the ambitions of the zone, while ensuring this does not displace existing funding. Such charges may not be used as a form of taxation to raise revenue generally."</p>
<p>Some respondents commented on how any revenue should/shouldn't be spent:</p> <ul style="list-style-type: none"> • Revenue should be reinvested into: public transport improvements, sustainable transport measures, local road and infrastructure improvements, air quality initiatives and promotion of active transport modes; and • Revenue should not only be invested in the wealthiest parts of the city. 	<p>Revenue will be used to run the Scheme. Any extra will be invested into measures that encourage use of greener modes of travel.</p> <p>See above for Section 3.10 point 160 in the CAZ Framework</p>
<p>Comments surrounding funding of the Scheme included:</p> <ul style="list-style-type: none"> • Once compliance is achieved how will the scheme pay for itself / has the cost of decommissioning the infrastructure been included • How will CAZ be funded? (Want details of cameras etc.) • Concern that CAZ will be costly to implement and a waste of public money. 	<p>The cost of implementing the Scheme is covered by central government. B&NES is submitting a bid for funding to cover these costs to central government. Costs of decommissioning are included in the Scheme costs. See the OBC for further details of Scheme costs.</p>
<p>Will council tax increase?</p> <p>Could Council Tax rebates be given to residents of Bath with non-compliant vehicles of Band C and below?</p>	<p>Any increases in council tax are unrelated to this Scheme. The scheme is funded by central Government. Council tax is not related to car ownership, or the emission levels of cars.</p>

4.5.7 Other

This section provides an overview other comments regarding scheme design that were not classified into the previous sections these included:

Comment / issue / question raised	Response/ how addressed
Can't entry points just be monitored?	The Council needs to pick up movements from polluting vehicles into, out of and within the CAZ boundary. Therefore, cameras are required throughout the zone, to pick up all polluting vehicle trips. See OBC-01 'Signage, Boundary and Camera Plans' within Appendix A of this OBC for proposed camera locations.
Proposals should be based on facts, clear and honest about the metrics wanted to change and the cost the Council is willing to pay with careful consideration of the risks taken	Noted. The Council is working to ensure the Scheme meets all legal requirements and this involves a considered approach to risk. Please see the Quantitative Risk Assessment in OBC OBC-23 'Quantitative Risk Assessment' Appendix M of this OBC.
ANPR Cameras will have negative visual impacts in Bath, a World Heritage Site.	Please see the Environmental Impact Assessment contained within the OBC-32 'Environmental Assessment' Appendix P of this OBC for consideration of this risk.
The CAZ works in London so why reinvent technology?	Central government guidance is followed, which has been informed by London's charging schemes.
There were comments concerning other pollutants: <ul style="list-style-type: none"> Concern that the Scheme is exclusively focusing on NO₂ and ignores pollutants from trains, wood burning stoves and bonfires including: PM_{2.5} / PM₁₀ / microparticulates / CO₂ emissions / particulate matter Concern about the impacts of PM_{2.5} and the link between this and diabetes What is being done about other pollutants / can they be monitored as part of the Plan? 	The Direction the Council received from central Government was to reduce NO ₂ exceedances in the shortest possible time. As part of the technical assessment, potential impacts of the Scheme to other pollutants are monitored. However, reducing them it is outside the remit of this Scheme. Other Council strategies are in place to monitor these pollutants and currently show no breach of legal limits.
ANPR cameras should be installed before CAZ implementation, to allow for a Before/After comparison	Some ANPR cameras are already installed and there is data from an ANPR survey conducted in October 2017 which should enable a before-and-after comparison. The network of air quality and traffic monitoring is being widened to provide before and after data. See OBC-26 'Evaluation, Monitoring and Benefits Realisation Plan' Appendix R of this OBC for the monitoring and evaluation plan.
Should consider the clean air implications in the allocation of school places. Choice of schools in Bath results in large amounts of school traffic in the city.	All trips made by non-compliant vehicles will be charged, regardless of their final destination. This includes school traffic.

Comment / issue / question raised	Response/ how addressed
Why do taxi drivers in London not have to pay congestion charges?	<p>A congestion charge is not being implemented within the city. The Council is addressing air quality to benefit the health of all those who live, work or visit the city. The Scheme proposed in Bath will charge high polluting taxis. 75% of all vehicles traveling through the CAZ are anticipated to be compliant in 2021.</p> <p>Taxis represent a significant amount of vehicle trips within the city and the Council is working with drivers to ensure that the taxi fleet is as clean as possible.</p>
Will there be a pilot?	The tight time scales in which compliance has to be achieved means there no time for a pilot study.
Is a reduction in NO ₂ good if the impact is increased congestion? Is a reduction in NO ₂ on Queen Square good if the levels in Batheaston or Combe Down increase?	<p>The Scheme is expected to improve NO₂ levels across the whole city including in Bathampton and Combe Down. Congestion is not expected to increase as a result of the CAZ.</p>
<p>Signs:</p> <ul style="list-style-type: none"> Can road signs and markings adhere to best practice guidance such as the Kensington and Chelsea Streetscape Guide; Is it possible to change the wording on any brown or white tourism signs to "Bath - A Clean Air City" or similar; and How will signage work around the CAZ? 	<p>JAQU is providing national guidance on road signs for the CAZ. See OBC-01 'Signage, Boundary and Camera Plans' within Appendix A of this OBC for signage design and plans.</p>
What technology is required to implement the Scheme effectively? What is the charging infrastructure? What are JAQU doing to standardise the charging equipment?	<p>ANPR cameras will be used. JAQU has committed to providing specification for ANPR cameras and signage. They are also looking into provision of a national payment system. Further information on standardising equipment is not available at this stage.</p>
There was concern that checking for signs at the edge of a CAZ zone would distract drivers' attention.	<p>Checking for signs to enter the CAZ should not be any different to looking at existing road signage and therefore it is not anticipated that this will cause any safety concerns.</p>

4.6 Non-Charging Measures

Many respondents commented on other, non-charging measures. The sections included within this chapter have been categorised using professional judgement, to help with presentation of information, as follows:

- Improvements to existing infrastructure
- New infrastructure
- Public transport and taxis
- Electric vehicles
- Other

Other measures would be funded through the Clean Air Fund or via excess revenue raised by the Scheme. The Clean Air Fund is a collection of money available to all mandated local authorities to bid for funding of their proposed other measures. A detailed list of the measures for which the Council has applied for funding and those proposed to be funded if excess revenue becomes available can be found in in OBC-08 'Option Assessment Report', Appendix C of this OBC.

4.6.1 Improvements to Existing Infrastructure

There were several suggestions for improving existing infrastructure, particularly bus infrastructure through signal improvements and the expansion of bus lanes. Other comments included:

Comment / issue / question raised	Response/ how addressed
<p>Many respondents suggested improving air quality through reducing congestion. Suggestions included:</p> <ul style="list-style-type: none"> • Traffic calming measures • Removing bottlenecks • Removing one ways systems • Removing the bus lanes • Restrict traffic on London Road (make 1 lane) • Traffic improvements on Park Lane • Remove the temporary bus lane from London Road • Implement a weight restriction on Windsor Bridge • Restrict large / wide vehicles on Upper Oldfield Park • The Robin Hood roundabout at Newbury shows that only small changes are needed to make a big difference. 	<p>The Council recognises there is public concern over congestion. The aim of this Scheme is to improve air quality rather than congestion. Providing additional road space is unlikely to solve city-wide air quality problems.</p> <p>Congestion issues are being addressed as part of a wider transport and parking strategy for Bath and these suggestions have been passed on to the relevant teams within the Council.</p>

Comment / issue / question raised	Response/ how addressed
<p>Respondents suggested the following changes to infrastructure to improve traffic flow:</p> <ul style="list-style-type: none"> Remove roadworks Remove traffic signals (at London Rd merge prior to roundabout) Revert Wellsway back to 2 lanes Widen junctions to allow HGVs to negotiate junctions/corners Revert London Road back to 2 lanes Prevent buses turning right into Old Fosse Road (go to the roundabout and back to turn left) Reduce the amount of 20 mph zones Remove one-way system: <ul style="list-style-type: none"> Remove Pinesway gyratory system and replace with 1 set of traffic lights Reroute traffic Inventive road layouts / exclusion zone area needed outside schools, so people are deterred/cannot drive near them 	<p>These suggestions have been passed on to other Council teams for further consideration within the ongoing transport strategy for Bath. These suggestions are not deliverable in this Scheme's timescales and tackle smaller more localised issues. Therefore, they would be unlikely to create and sustain the widespread improvement to air quality required.</p>
Remove coach parking from 'Bog Island on Terrace Walk	Coach parking spaces have been moved from the city centre to Odd Down Coach Park as part of the transport strategy. Further alterations are not proposed as part of this Scheme.
Walking and cycling should be incentivised and considered separately and not pushed to the bottom of agenda	Walking and Cycling are considered separately in Bath's transport strategy. The Council recognises that there is potential to improve walking and cycling in the city and is working to improve uptake of these transport modes. The Clean Air Fund and excess revenue will be used to fund pedestrian and cycle facility improvements where possible. As part of this Clean Air Plan, the Council has launched a campaign to raise awareness of air pollution and alternative ways to travel.
<p>Respondents suggested improving pedestrian facilities to encourage modal shift, suggestions included:</p> <ul style="list-style-type: none"> Level the surfaces for pushchairs / wheelchairs; and Pedestrianize Milson Street. 	<p>Delivery of these suggestions would not deliver compliance in the timescales required by this Scheme. The Clean Air Fund and excess revenue will be used to fund pedestrian facility improvements where possible. Please see in OBC-08 'Option Assessment Report', Appendix C of this OBC for further details.</p>
<p>Cycle lane improvements are required on:</p> <ul style="list-style-type: none"> London Road Wellsway (in both directions) Holloway to Manvers Street; Bath - Bristol cycle path (resurface and connect to Keynsham) Canal by London Road River by Newbridge. 	<p>Delivery of these suggestions would not deliver compliance in the timescales required by this Scheme. The Clean Air Fund and excess revenue will be used to fund cycle lane improvements where possible. Please see in OBC-08 'Option Assessment Report', Appendix C of this OBC for details.</p> <p>Cycling schemes are further considered as part of the wider transport strategy for Bath.</p>

4.6.2 New Infrastructure

In addition to suggestions to upgrade existing infrastructure, a number of suggestions were received for new infrastructure. These suggestions extend beyond the scope of this project and have been passed to the Council for wider consideration as part of ongoing work on transport issues.

Comment / issue / question raised	Response/ how addressed
<p>Many respondents suggested large scale new infrastructure including:</p> <ul style="list-style-type: none"> • A tunnel link between the two main A roads • A36 / A46 link road • A420 / A4 link road • A bridge from A36 to Bathford • A bridge from the bottom of London road • A tram system. <p>Have there been any further thoughts about A37 (Temple Cloud and Farrington Gurney) and pollution?</p>	<p>Compliance with legal limits must be met by 2021 at the latest. Any large infrastructure projects cannot be delivered within the timescales of this Scheme.</p> <p>These suggestions have been passed to the relevant council teams for future consideration.</p> <p>The Council has declared an Air Quality Management area in Temple Cloud and Farrington Gurney to monitor pollution and consider the best ways to reduce levels of NO2 on the A37, in consultation with residents.</p>
<p>Provide an alternative route to enable traffic to travel around Bath rather than pay the charge to drive through the city</p>	<p>The Council is constrained by timescales. Compliance with legal limits must be met by 2021 at the latest, therefore large infrastructure projects, such as a new route, cannot be delivered within the timescales for this Scheme.</p> <p>Traffic in Bath and neighbouring areas needs to be less polluting. Providing an alternative route runs the risk of displacing the air pollution problem elsewhere.</p>
<p>Suggestions included providing new bus infrastructure:</p> <ul style="list-style-type: none"> • A central bus station • Dorchester Street / Manvers Street bus gate • Docking stations to power heating/AC when the bus is stopped. 	<p>These suggestions have been passed on to the appropriate Council team for further consideration as part of Bath's wider transport strategy. The Council is constrained by timescales. Compliance with legal limits must be met by 2021 at the latest and this type of infrastructure cannot be delivered within the timescale.</p>
<p>Improved cycling infrastructure is required to support modal shift:</p> <ul style="list-style-type: none"> • Segregated cycle lanes • Have shared cycling and walking spaces • Link green spaces by cycle lanes • Increased availability of bikes for locals • Reduce potholes • Affordable bike lending schemes • Bike lifts • Cycle contraflow lane • Secure bike parking. 	<p>Cycling schemes are being considered as part of the package of non-charging measures and as part of the wider transport strategy for Bath. These suggestions have been passed to the relevant team members for further consideration. The Clean Air Fund and potential revenue will be used to fund cycle schemes where possible. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for further details</p>

4.6.3 Public Transport and Taxi's

Many respondents commented on public transport and taxis. The Council recognises that the CAZ will impact on operators and is working closely with them to explain the proposals and help them consider ways to achieve compliance.

Comment / issue / question raised	Response/ how addressed
<p>Many respondents suggested reducing the price of or providing free public transport. Some responses provided methods to enable this including:</p> <ul style="list-style-type: none"> • Reduce price of fuel tax • Direct intervention / invest in bus companies • Implement an oyster card style payment for buses that allows cross company payments <p>Specifically, respondents were in favour of reducing the cost of buses to:</p> <ul style="list-style-type: none"> • Families • Children • Owners of high polluting vehicles. 	<p>Fuel tax is controlled by Central Government and altering the price is not within the Council's power.</p> <p>At present, bus services in Bath are operated by commercial companies which are responsible for setting their own fares, as such the Council cannot reduce the cost of bus travel. Other ways to support owners of high polluting vehicles are under investigation.</p> <p>Further details can be found in OBC-08 'Option Assessment Report', Appendix C of this OBC, which details the projects included in the Clean Air Fund bid and those considered for funding through excess revenue.</p>
<p>Many respondents suggested bus service improvements were prioritised. Comments included:</p> <ul style="list-style-type: none"> • Circular buses around the city • One-way buses through Batheaston • Reduce the frequency of university buses • Increase publicity of BathRider • Comprehensive review of the 3-stop-hop. <p>It was noted that there is difficulty to get buses to/from</p> <ul style="list-style-type: none"> • Swainswick • Royal Victoria Park • Universities • Combe Down • RUH • Outlying villages. 	<p>Bus services in Bath are commercially operated and routes are determined by the operators.</p> <p>The Council is working closely with transport operators to ensure all key routes are served and that their impact to air quality is reduced. These suggestions and route concerns will be communicated to the relevant operators.</p>
<p>CAZ needs to be combined with an improvement in public transport and green transport infrastructure</p>	<p>The Council recognises that public transport improvements and expansion of green transport infrastructure is important to many. The Council does not provide public transport; it is run by a number of commercial operators. In addition to other Council policies working to address green transport infrastructure as part of the wider transport strategy for Bath.</p> <p>Public transport route improvements are on the list of measures to be funded by excess revenue, if available. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for details.</p>

Comment / issue / question raised	Response/ how addressed
<p>More general comments regarding public transport included:</p> <ul style="list-style-type: none"> Bath does not have any feasible alternatives to driving Public transport is not effective or reliable Parking is cheaper than public transport Promoting buses / rail is not a sustainable alternative as they have high emissions All buses (including tourist and university buses) should not be encouraged to use the city centre unless they convert to non-polluting fuels Restrict bus / coach entries within the city, or only allow electric buses or low emission buses B&NES should incentivise travel by bike and bus. 	<p>Broken down per person, buses emit fewer emissions than cars, so the Council promotes their use.</p> <p>However, public transport in Bath is run by a number of commercial operators, so the Council has limited influence on prices and route maintenance etc.</p> <p>The Council will continue to talk to operators to help them upgrade their fleet and improve emissions (become compliant). It is hoped that increased demand for public transport will encourage operators to improve routes. Suggestions and route concerns will be communicated to the relevant operators.</p>
<p>Comments concerning Bath Park and Ride</p> <p>There were suggestions for new park and ride locations and extensions of the service including:</p> <ul style="list-style-type: none"> East of Bath Charmy Down Radstock RUH. <p>Some respondents called for better use of Park and Ride through:</p> <ul style="list-style-type: none"> Reconsidering the cost / making services free Providing discounts to low income households Expanding the operational hours Increase the frequency of buses Charge per vehicle rather than per passenger Pay to park rather than ride the bus. <p>Other respondents suggested stopping all night buses except park and ride buses</p>	<p>New Park and Ride sites, expansions and additional capacity is on the list of measures to be funded through additional revenue generation, to be delivered after 2021. Secure parking is proposed to be provided at the existing Park and Ride sites to encourage overnight parking and facilitate extended operating hours. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for further details.</p> <p>The Council is also working closely with transport operators to determine the feasibility of demand-based shuttle / minibuses to support the park and rides.</p> <p>The Council are working with transport operators to ensure that the offers available for those traveling with children on the park and ride is clearly communicated with those who live, work or visit Bath.</p> <p>Night buses are used by many residents including workforce. Their continued operation provides users with a more flexible approach to travel.</p>
<p>Comments related to train travel included:</p> <ul style="list-style-type: none"> Will the rail be electrified to reduce pollution? Improve rail connectivity to small towns on the outskirts and improve the capacity of trains New stations in Twerton, Larkhall and Newbridge. 	<p>The Clean Air Plan is focused on reducing pollution from road traffic. Train operation is regulated at a national level and is therefore outside the scope of this Scheme.</p> <p>B&NES support rail improvements as train travel is an effective way to transport large numbers of people. The Council will pass on these comments to the relevant rail operators.</p>
<p>Suggestion that mini buses be run to help elderly get to town etc if cars are charged.</p>	<p>As part of the OBC an assessment has been undertaken to understand issues faced by groups such as elderly, and work towards finding solutions. Further information is provided in OBC-19 'Distributional and Equalities Impact Analysis' in Appendix G.</p> <p>A concession for Community Transport providers is under consideration.</p>

Comment / issue / question raised	Response/ how addressed
<p>Some respondents had suggestions related to taxi travel. These included:</p> <ul style="list-style-type: none"> • Subside travel by taxi • Incentivise taxis to upgrade their fleets to hybrids or electric vehicles • Increase taxi rank provisions in Kingswood due to increased leisure businesses opening • Increase the number of taxi operators within the city to reduce the prices • Concern that upgrading vehicles would be difficult for taxi drivers by 2021 • Would a full electric taxi be able to be licenced straight away? • Solutions and mitigation for taxi drivers should be cost effective. 	<p>The Council recognises the importance of taxi travel in Bath and also its contribution to emissions. A consultation of the revised Taxi Policy is currently underway, and the taxi licencing team have been working closely with drivers, operators and the air quality team to ensure a cohesive approach.</p>
<p>Improve opportunities to travel via active modes by:</p> <ul style="list-style-type: none"> • Increasing bike space on trains • Bike racks on buses • Promote Park and walk, Park and Pedal (in Milford) and train and bike schemes and create longer stay bays around central zones. 	<p>Improving uptake of active modes is being considered as part of the wider transport strategy for Bath. These suggestions have been passed to the relevant team members for further consideration. In addition, their delivery from additional revenue funding will be considered. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for further details</p>

4.6.4 Electric Vehicles

A number of respondents provided comments relating to electric vehicles. It should be noted that The West of England was awarded £7 million in funding through the "Go Ultra Low" package, to encourage wider use of low emission transport. Part of this funding will be used in B&NES to increase public charging points, match fund business charge points and demonstrator cars and provide car club bays.

Comment / issue / question raised	Response/ how addressed
<p>Improve electric vehicle infrastructure through:</p> <ul style="list-style-type: none"> • Adding free electric charging points across the city • Incentives for electric vehicle uptake • Liaise with car manufactures to provide offers on electric vehicles • Adding electric charging points at taxi ranks • Invest in electric buses / electric bus shuttle system • Electric charging devices which enable people to use their own electricity are required. 	<p>In addition to the electric vehicle infrastructure being delivered as part of the "Go Ultra Low Package", improvements are being considered within the non-charging measures.</p> <p>Discussions with taxi drivers about locations of potential charging points for their vehicles as part of the taxi licensing policy review consultation has resulted in a proposal for additional charging points for use by taxis. Please see OBC-08 'Option Assessment Report', Appendix C of this OBC for details.</p> <p>Buses in Bath are commercially operated. The Council has applied for funding to help the bus fleet become cleaner through the Low Emission fund. Many bus operators did not support electrification and instead preferred gas fuelled alternatives.</p>
<p>Provide / subsidise electric bikes</p>	<p>The proposal to introduce electric cycle hire is included in the "Go Ultra Low Package".</p>

Comment / issue / question raised	Response/ how addressed
What are the options for electric charging in Bath currently?	Electric vehicle charging point locations in B&NES can be found in Table 8.2 on page 99 of the Parking Strategy. There are currently 38 in Bath, 4 in Keynsham and 3 in Midsomer Norton.
Electric vehicles are not a viable replacement, the UK does not have the infrastructure for them. It is difficult for residents living in flats to charge their vehicles.	There is not sufficient infrastructure in the UK to encourage or enable everyone to buy electric vehicles. As demand increases it is likely that supply of the infrastructure needed will also increase. Bath is reviewing the provision of their electric vehicle infrastructure as part of the Go Ultra Low Scheme. There are also measures considered in the list found in in OBC-08 'Option Assessment Report', Appendix C of this OBC for funding through the Clean Air Fund or revenue from the scheme.
Only allow electric vehicles within the city	Fully electric vehicles will be exempt from paying the CAZ charge. Compliant vehicles - which includes lower-emission petrol and Euro 6 Diesel vehicles - will be allowed to drive within the zone without charge. The Council must meet legal requirements but has proposed a scheme that minimises the impact on local residents and businesses.

4.6.5 Other

Responses for other measures not falling into the above categories where provided throughout the consultation period. These included:

Comment / issue / question raised	Response/ how addressed
Concern that the non-charging measures will not help residents	<p>It is anticipated that 75% of all vehicles travelling through the city when the CAZ is implemented will be compliant.</p> <p>A detailed list of the measures that the Council has included in its funding application (and other measures proposed if there is excess revenue from the scheme), can be found in OBC-08 'Option Assessment Report', Appendix C of this OBC.</p> <p>The Council is investigating how best to support residents with travel choices that comply with the CAZ.</p>
<p>Multiple suggestions were received to prevent HGVs from accessing specific areas or roads, these included:</p> <ul style="list-style-type: none"> • The city centre • London Road (between 07:00 - 19:00) • Pennyquick • Cleveland Bridge • Roads passing schools • Banning HGVs irrespective of their Euro Standard. 	<p>HGV deliveries are essential to the operation of businesses in Bath. All high emission vehicles contribute to NO₂ levels. Non-compliant HGVs would be charged to enter the CAZ, but compliant vehicles would not be prevented from continuing their business in Bath.</p> <p>Bath is one of twenty-eight local authorities implementing a clean air zone. It is therefore envisioned that national transport operators will recognise the financial benefits of upgrading their fleets.</p>

Comment / issue / question raised	Response/ how addressed
<p>Suggestions for how to reduce freight emissions included:</p> <ul style="list-style-type: none"> • Out of town freight transshipment locations • Use zero emission 9 tonne electric vehicles at M4 J18 • Freight consolidation centre • Use freight delivery management • Make home deliveries more efficient or restrict the delivery window • Smaller delivery vehicles should be used in the city centre. 	<p>Freight consolidation land requirements means some of these suggestions cannot be delivered in the tight timescale required.</p> <p>As part of its public engagement, the Council will be working with LGV drivers and delivery firms to ensure they can operate with minimum impact on air quality.</p>
<p>Government should:</p> <ul style="list-style-type: none"> • Pay for retrofitting • Sponsor Car Scrappage Schemes. 	<p>Following a consultation in autumn 2017, central Government decided a national scrappage scheme would not be offered. See "UK plan for tackling roadside nitrogen dioxide concentrations Detailed Plan" section 7.4.1.4 point 119 for more detail.</p>
<p>Why is targeted traffic management or improved bus priority on A367 Wells Road not included in Class D package?</p>	<p>The non-charging measures proposed in the SOC were applicable for all CAZ classes.</p> <p>The non-charging measures have since been refined through a series of assessments. A list of non-charging measures proposed can be seen in OBC-08 'Options Assessment Report' Appendix C of this OBC.</p>
<p>What are the criteria for discarding non-charging measures?</p>	<p>The Council followed Government guidance to shortlist the non-charging measures in the SOC from a longer list put forward by the public. Further information on the selection of non-charging measures can be found in the SOC in sections 3.4.1 and 3.6.1, with the full analysis found in the SOC Appendix A.</p> <p>This has been refreshed after the release of the Clean Air Fund funding guidance. See OBC-08 'Options Assessment Report' Appendix C of this OBC for further detail.</p>
<p>Offering a reduction in parking charges to low emission vehicles.</p>	<p>The Council is working on this scheme with implementation planned for next year as part of the Parking Strategy. Additionally, as part of the non-charging measures, the Council is applying for funding for drivers of ULEVs to receive discounted parking permits. This is to encourage the uptake of ULEVs within the CAZ.</p>
<p>Enforce anti-idling policy for buses, taxis, cars</p>	<p>Anti-idling enforcement is included in the bid for funding from the Clean Air Fund. Further details can be found in OBC-08 'Option Assessment Report' Appendix C of this OBC</p>

Comment / issue / question raised	Response/ how addressed
<p>Other suggestions included:</p> <ul style="list-style-type: none"> • Review of a speed limit on London Road • Prevent smoking in the city • Ban petrol / diesel strimmers on allotments; • Implement a workplace parking levy • Facilitate walking buses to schools • Air filters for school buildings on roadsides, such as Widcombe • Electric mini buses should be used by private schools to collect school children, the collection points along key routes should increase • More efforts to make motorbikes more popular / safer to use and other such initiatives • Increase the number of trees within the city; <ul style="list-style-type: none"> - Plant trees at the roadside - Include trees in new developments - Do not remove trees unless they are unsafe - Green walls. • Provide interactive NOx Information Tool to educate car drivers and promote behavioural change • Improvements to school buses are needed, more capacity, better routes and extended operating hours to cover after school clubs • New developments should contribute to the improvement of the transport system • Reinstate trader permits • Council and car manufacturers should inform the public about discounts for exempt car types ahead of the new car year (August) • Increase outreach events (sports, education, health) to reduce the demand to travel. 	<p>Given the time constraints facing this Scheme, these suggestions (individually or together) will not have enough impact on air quality in Bath to ensure we meet NO2 reduction targets in the timeframe (2021 at the latest).</p> <p>Research suggests that planting more trees has a minimal impact on air quality.</p> <p>The Council considered all of these measures as part of the OBC. Due to funding availability from central government, the number of other measures included in the Scheme has been restricted.</p> <p>The Council recognises that these suggestions have value and has passed them on to other teams for consideration.</p>

4.7 Technical

This section provides an overview of comments received about the technical work of the Scheme. Comments have been sub-categorised into the following:

- Data collection
- Modelling / scheme assessment
- Other

4.7.1 Data Collection

Some respondents had comments on data collection. These included:

Comment / issue / question raised	Response/ how addressed
Concerns over the validity of the ANPR data. Did ANPR survey consider traffic on Bathwick Hill and Brassknocker Hill, rather than the A36 between Sydney Gardens and Brassknocker Hill traffic lights?	Yes, there are enough ANPR sites that the traffic camera locations can be filtered on.
Has there been a study to see how many non-compliant vehicles are in registered in Bath?	Analysis of the number of non-compliant cars registered in Bath and driving through Bath has been undertaken. It is anticipated that by 2021 75% of all vehicles driving through Bath will be compliant with the CAZ. A two-week ANPR survey provided information on the split of compliant and non-compliant vehicles travelling through Bath. This data can be found on the Bath Breathes website. This is important because it is the number of trips made by polluting vehicles that is a concern. Further details can also be found in OBC-14 'ANPR Data Analysis and Application' within Appendix E of this OBC.
How will ANPR data be used and analysed? Is it used in the SOC?	ANPR data has been used in the modelling work undertaken as part of the OBC. See OBC-14 'ANPR Data Analysis and Application' within Appendix E of this OBC for analysis.
Will data (ANPR, Stated Preference Surveys information) be released?	ANPR data is available in the FAQs on the Bath Breathes webpage. The Stated Preference Survey data can't be made available for data protection reasons. A detailed analysis of this data is provided in OBC-30 'Stated Preference Surveys Report' Appendix L of this OBC.
Surveys can be unreliable. Is other information from around the UK being used as well? The CO2 emissions in the SOC seem high.	Yes, where available, information from other cities is incorporated into the technical work. However, the Stated Preference Survey has provided locally unique information to Bath to inform the charge required to deter people with non-compliant vehicles from entering the zone. This approach is more accurate than using national data.
Is there a diffusion monitoring tube on Greenway Lane?	A diffusion tube monitoring site was installed on Greenway lane in August 2018 as part of an expansion of the diffusion tube monitoring sites in B&NES.

Comment / issue / question raised	Response/ how addressed
Would like to see a coach idling study.	The Council produced a Coach Parking Strategy ¹² in 2017 which considered idling coaches in the city centre. Additional coach parking has been implemented at Odd Down Park and Ride and coaches are encouraged to drop off in the city and then move away to Odd Down Park and Ride.
Diffusion tubes should be located at child head height. Data is skewed, and children are closer to polluting traffic. This is not reflected in current modelling.	In accordance with Local Air Quality Management guidance, diffusion tubes are placed at a height of 2 to 4 metres above ground. This is to reduce the theft of tubes. All diffusion tubes within BANES adhere to this guidance.
The monitoring of air quality in Bath over the last 15 years has shown no change	Air quality data is available on the website. Some improvement can be seen but there has not been enough improvement. This resulted in the Direction from the government to improve air quality in Bath.
Can data be obtained from ANPR cameras to supplement traffic monitoring modelling of diversionary routes, to have a clear 'before and after'.	Traffic counts will be used to collect data for a before-and-after study.

4.7.2 Modelling / Scheme Assessment

Some respondents commented on the modelling work and Scheme assessment. Comments included:

Comment / issue / question raised	Response/ how addressed
How have behaviour changes and modal shift been incorporated into the modelling? How is the Council sure these are accurate? Particularly the modelling of HGVs avoiding the zone.	For details of this modelling work please see the T4 forecasting report contained in OBC-17 'T4 Transport Modelling Forecast Report' within Appendix E of this OBC.
Have topography, historical infrastructure and future demands been incorporated into the model?	Yes, topography, historic buildings, walls and trees have been incorporated into the modelling work. Please see OBC-10 'AQ2 Local Plan Air Quality Modelling Methodology Report' within Appendix D of this OBC. The model uses information on future demand using information provided by DEFRA. For robustness, sensitivity tests were undertaken, further information on these are available in OBC-31 'Sensitivity Testing Report' Appendix N of this OBC.
Are trains included in the modelling?	Not directly, but NO ₂ concentrations are verified against monitored air quality data. Further detail can be found in OBC-10 'AQ2 Local Plan Air Quality Modelling Methodology Report' within Appendix D of this OBC.
Concern that an option which achieves just under the "safe levels of air pollution" will be implemented, no level of pollution is safe.	The Council is working to achieve compliance with legal limits (40µg/m ³) in the fastest time possible. This work is funded by central Government.

¹² http://www.bathnes.gov.uk/sites/default/files/coach_parking_strategy_exec_summary.pdf

Comment / issue / question raised	Response/ how addressed
Concern that a scheme without adverse impacts will be very difficult to design	The Council is working to minimise adverse impacts through the thorough technical assessment. Funding is available to minimise these concerns through non-charging measures via the Clean Air Fund. See OBC-08 'Option Assessment Report' Appendix C of this OBC for further details.
Would like to see the modelled impacts to air quality on the side streets	Concentrations of all modelled links are included in OBC-11 'AQ3 Air Quality Modelling Report' in Appendix D of the OBC.
Concerned that CAZ modelling underestimates driver behaviour and therefore the modelled effects of rat-running are not representative	Driver behaviour is based on stated preference surveys of local drivers to determine how they would respond to various scenarios. Rat-running has been included within the model. For robustness, the technical modelling also includes sensitivity testing. This involves additional model runs to account for optimistic and pessimistic scenarios. Please see the OBC-31 'Sensitivity Testing Report' Appendix N of this OBC for further details.
Some respondents expressed concern over real world emissions and the impact of using euro standards to reflect vehicle emissions. This includes: <ul style="list-style-type: none"> Concern that basing CAZ on the Euro classifications is inaccurate Suggest random testing of Euro 6 vehicles to determine actual level of emissions Euro 7 introduction (2019) - will it prove that even Euro 6 diesel vehicles are very polluting? 	Information provided by DEFRA predicts different emissions from Euro 6 diesel vehicles registered in different years. For robustness, sensitivity tests have been included in Sensitivity Testing Technical Note in OBC-31 'Sensitivity Testing Report' Appendix N of this OBC. These tests include "high" emissions and "low" emissions scenarios in line with JAQU guidance.
Further consideration of the impact of air pollution on children and the location of schools and parks should be considered when conducting modelling work	The CAZ will bring air quality benefits to all those who live, work and visit the city.
Does the modelling include: <ul style="list-style-type: none"> Bath Quays development The toll bridge Pennyquick / Frome Rd / A367 / B3110 Bradford Road / Brassknocker. 	Yes, all these are included in the transport model.
Is the required P&R and bus capacity being modelled?	Existing capacity is included in the modelling work. Increased capacity is not relied on for compliance so is not included in the model.
There is no transport data for B&NES residents under five, does this mean that car journeys that adults are making to take children places are missed?	All car journeys are included in traffic surveys. Vehicles and journeys are modelled, not passengers.
How many vehicles will be prevented from coming into the city?	No one will be prevented from coming into the city. Non-compliant vehicles will be required to pay a daily charge but will still be able to enter, leave and drive within the CAZ.

Comment / issue / question raised	Response/ how addressed
Is the CAZ necessary in Bath if Bristol are implementing one?	Yes. Bath and Bristol have received separate directions from the government to tackle exceedances in each city, therefore improving health benefits within both cities. The Council must comply with their legal requirements and Bristol must comply with theirs. The Council is engaging with BCC to ensure both authorities are up to date with each other's progress and work together to realise efficiency savings.
When and how will it be known if compliance has been achieved? How will real time air monitoring work? Can current measures be refreshed?	Legal limits are based on annual averages, this means 12 months of data must be collected after implementation to confirm compliance by 2021 at the latest. Monitoring information and data can be found on the website. See for the OBC-26 'Evaluation, Monitoring and Benefits Realisation Plan' Appendix R of this OBC.
<p>Some respondents had questions concerning economic modelling:</p> <ul style="list-style-type: none"> How are the wider economic impacts being measured/estimated? E.g. what is the assumed proportion of people switching modes to make the trip, rather than abandoning the trip altogether? If everyone switches modes, then economic impact is reduced Are the health costs to the NHS and Council modelled? Has the impact charging cars would have on employment at Bath Quays and across Bath been considered? 	<p>Responses are based on stated preference survey results and comparison of annual charges and annual average vehicle replacement costs. Set out in OBC-16 'Primary Behavioural Response Calculation Methodology' within Appendix E of this OBC.</p> <p>Health costs are modelled in accordance with national guidance, which requires a 'damage cost' to be applied to each tonne of emission. This is intended to reflect the total health costs to society but does not explicitly differentiate costs to NHS or council.</p> <p>The economic assessment undertaken follows government guidance and assess the overall economic impact to society.</p>

4.7.3 Other

Other technical comments received include:

Comment / issue / question raised	Response/ how addressed
How is through traffic defined?	Through traffic is traffic driving through Bath that does not stop but continues on to another destination.
Concern that London Road will still breach limits by 2029	The modelling work shows compliance will be achieved with the implementation of the CAZ. Compliance will be closely monitored.
Concern about clarity of documents and rate of progress	The Council is considered by central Government to be part of a leading group in terms of progress. The OBC documents presented the information available at that time. As the work progresses more details are made available.
Feels that the top end of Greenway Lane has worse air pollution than London Road	This statement is not supported by either the air quality monitoring or modelling, both of which accord with the national standards and government guidance.
Could use some Council employees as a sample of low income residents	Thank you for this suggestion, this has been passed on to the technical team.

Comment / issue / question raised	Response/ how addressed
Better for the environment to keep existing cars rather than replace them	The Scheme focus is improving air quality through reduction of NO ₂ to legal limits. Reducing the number of higher emission vehicles by encouraging a shift to compliant vehicles or sustainable travel modes is considered the best way to tackle this and bring about health benefits to people living, working and visiting Bath.
Some respondents had questions concerning through traffic: <ul style="list-style-type: none"> How many lorries and cars drive through Bath What would be the impact of removing through traffic? How much of the traffic on London Road is through traffic? What is the percentage of traffic that goes through to the A4 and A36 at Sydney Gardens Junction? 	ANPR data is used in the technical modelling to analyse vehicle trips. The analysis for the OBC has included much more detailed modelling work incorporating the data from the ANPR survey. Between 20% and 30% of traffic on London Road uses the A4/A36/A46 routes rather than heading into Bath city centre.
Are pollution reductions required across Bath or just at London Rd?	There are a number of places across Bath that currently exceed legal NO ₂ limits. All exceedances must be reduced, not just the one at London Road. See OBC-19 'Distributional and Equalities Impact Analysis' in Appendix G of the OBC for locations of existing and predicted exceedances.
Will all 3 options identified in the SOC bring compliance?	The modelling work shows that only a Class D CAZ will be sufficient to achieve compliance by 2021.
How will the NO ₂ emissions to the west of Bath (Upper Bristol Road / Windsor Bridge) be reduced?	The air quality benefits of a CAZ are not limited to the area included within the boundary because the overall changes in the fleet composition to more compliant vehicles will improve air quality across the whole of Bath. Upper Bristol Road and Windsor Bridge see improvements in concentrations, with Upper Bristol Road in particular seeing some very large improvements. Please see OBC-11 'AQ3 Air Quality Modelling Report' in Appendix D for modelling results.
What health problems are associated with air quality?	A high level of NO ₂ makes heart and lung conditions worse. 12,000 people in Bath and North East Somerset suffer from asthma, and exposure to NO ₂ at high levels 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.
Can autonomous or driverless vehicles be anticipated?	This is unlikely to be widespread by 2021 and therefore is not considered as part of the analysis.
Where does CAZ fit in with the hierarchy that the Key Road Network already have?	The Key Route Network (KRN), which is a WECA initiative has not yet been published. The Council is working with WECA to understand the likely outcome of the ongoing KRN study.
Can the Council control the fares of operators like Uber?	The Council is able to regulate the fares of Hackney Carriages but not Private Hire Operators such as Uber.

Comment / issue / question raised	Response/ how addressed
What benefits will be seen in Bath from the Bristol CAZ?	This is difficult to predict as at the time of writing; the Bristol scheme has not yet been selected. However, the Council is continuing to work closely with Bristol to understand this. Details of approximate percentage trips that use both cities is considered in OBC-31 'Sensitivity Testing Technical Note' in Appendix N.
Have blue badge holders / careers been included within the modelling?	Yes, all vehicles which currently use the road are modelled.
Will the CAZ be in SATNAVS?	It is unknown whether CAZ will be in SATNAVS. The Council has made enquiries.

4.8 Engagement

This section provides an overview of comments received on the engagement work undertaken. Comments have been categorised using professional judgement into the following categories:

- General
- Political
- Engagement events
- Engagement materials.

Engagement work continues, and all groups will be contacted again in October on release of the OBC to provide another opportunity for comment.

4.8.1 General

Some respondents commented on the engagement work. Comments included:

Comment / issue / question raised	Response/ how addressed
Many respondents welcomed the engagement work. Some noted that the engagement process should ensure that all voices are represented, and the responses gathered reflect diversity in gender, incomes, race and age	The Council is working to ensure far-reaching engagement work. The Project team is working to reach even more people during this next phase of engagement.
A number of respondents requested the project team engaged with particular groups	These requests were passed on to the project team and meetings organised.
Increased interaction between the public and Council officers and Councillors is needed	The Council has facilitated good communication and interaction between groups throughout the project. Councillors are on the Project Board, who meet every month. Councillors are also provided with updates in between meetings. Additionally, at public engagement events, council officers and councillors were present.
There should be a direct link between Resident Associations, project team, the Cabinet and councillors	The Council has been working to ensure that, as key stakeholders, the residents associations are regularly engaged and have multiple opportunities to ask questions and raise concerns which are passed onto the relevant teams.
Concerned that the engagement did not include residents of London Road	Every effort was made to engage with residents across Bath. Every resident association was invited to one or more engagement event and emailed links to the online survey. A drop-in event was also held at Morrisons on London Road to try and capture London Road residents.
Concern that timescales are too tight. Consultations should have been earlier and for longer. Decisions should not be rushed due to this.	Engagement is a continuing process. The Council has been engaging with stakeholders since February 2018 and will continue to do so. There will be a formal engagement period on the preferred Scheme in the Autumn, once the OBC has been released. Timescales must allow sufficient time for technical work to ensure the work is robust and reliable.

Comment / issue / question raised	Response/ how addressed
Concerned about the publicity / reach of the consultation process. Information is not reaching all citizens of members of society, specifically the elderly and lower income residents	Despite engagement efforts, it is recognised that some groups will not have been reached. During the formal engagement in the Autumn, flyers will be sent to every household and business in Bath and the communications campaign will be widened to try and ensure every interested party can comment on the Scheme. The Council will increase efforts to work with representatives from vulnerable groups
Plans did not appear on internet searches - neither the Chronicle or council website	During the engagement processes the website was rewritten to ensure that keywords: 'Bath, Clean Air Zone' returned the Breathe web pages in Google search results
Stakeholders should be involved in the formation of any option to charge cars	Legally pollution must be reduced in the shortest possible time. There has been continuous engagement with stakeholders throughout the process to keep them informed of the proposals and listen to concerns and suggestions. However, decisions are based on the technical work which shows that compliance can only be achieved through implementation of a Class D CAZ.
Plan needs to consider its impacts on neighbouring authorities	The Council has been engaging with neighbouring authorities as part of the engagement process and this will continue. This will enable better understanding of potential impacts for further consideration.

4.8.2 Political

Comment / issue / questions raised	Response/ how addressed
What do local MPS Jacob and Wera think?	The local MP's are aware of the project and will provide their views independently.
What political will is there to make bus operators change?	The Council is working with bus operators to upgrade their fleet. This is supported by the Cabinet Members.
Can the scheme be changed next year if administration changes?	The Council must comply with the Direction by 31 st December 2018.
Is there cross-party agreement	All political parties have had the opportunities for separate briefings about the CAZ.
What impact will Client Earth have on the plans?	Client Earth are not currently directly involved in the project since B&NES is taking all necessary steps to comply with the directive.
Concerned that political pressure will prevent the implementation of CAZ or result in a low charge, insufficient to initiate required behaviour change	The Council must comply with the Direction by 31 st December 2018

4.8.3 Engagement Events

Comment / issue / questions raised	Response/ how addressed
Felt that the format of the surgery sessions wasn't made clear enough on the website.	This will be further considered in the next steps of the engagement work.
Difficult to attend the public events as the bookings were full	All engagement events were advertised on the BathBreathes website and in newsletters and social media as far in advance as possible. There were often surgery slots not booked and attendance at public drop-ins did not require booking.
A debate is required	Professional experience suggests that smaller format events better enable the collection of individual views as they enable one-to-one discussions.
Engage with schools (primary and secondary) to promote sustainable travel choices to pupils, parents and teachers	One of the measures included within the CAF fund bid is a scoot/walk to school scheme. See OBC-08, Option Assessment Report, in Appendix C of this OBC for further details.
Use FOBRA to promote attendance from all residents' associations	Every resident association was contacted, and the Council engaged with FOBRA multiple times and will continue to build on these relationships in the next stage of the engagement process.
Should be greater publicity around the events, suggestions for this included: <ul style="list-style-type: none"> • Sending leaflets; • Advertising in a council newsletter; and • Advertise on the council website rather than on social media. 	These suggestions will be further considered in the next steps of the engagement work. Events were advertised in the council newsletter and on the council website. The Council is considering the use of leaflets during the next engagement phase.
All responses in drop ins / workshops should be noted down and considered	Where possible responses and conversations from engagement events were noted down for consideration and are included in this report.
Suggested amendments to engagement events to take place: <ul style="list-style-type: none"> • On Saturdays • In central areas • In New Oriel Hall • To the east of the city centre • In council owned buildings / the Guildhall • Local villages: Batheaston, Bathford, Bathampton • Outside of Bath South and North • At school pick up times with school children and parents. 	The Council will consider these suggestions for the next engagement period.

4.8.4 Engagement Material

Many respondents commented on the engagement materials. Comments included:

Comment / issue / questions raised	Response/ how addressed
The questionnaire should be simpler, more accessible and more visual	These suggestions will be further considered in the next steps of the engagement work.
The maps used in engagement should include local road names and local schools and nurseries plotted	These suggestions will be further considered in the next steps of the engagement work.
Would like to see: <ul style="list-style-type: none"> The advantages / disadvantages of each option and the impact that each would have Case studies from other countries. 	These suggestions will be further considered in the next steps of the engagement work.
Would like to increase methods to submit feedback, suggestions for this included: <ul style="list-style-type: none"> Allow option for returning feedback forms after engagement events Written submissions Comments on social media Feedback option online. 	All of these options were available during the engagement work. If there are specific improvements you think are needed, suggestions are welcomed.
Concerned that there is very little information provided at this stage in the consultations	As much information as possible was provided at all stages. Further information has been shared in the OBC.
Some respondents commented on the format of the engagement materials. Comments included: <ul style="list-style-type: none"> Liked website content Document formats worked well Ensure the objective is stated at the front of the report Have a "sign up for newsletter" form on the website The engagement material looks great and well thought out Improve the information provided on the B&NES website. 	<p>These suggestions will be further considered in the next steps of the engagement work.</p> <p>The website was regularly updated to provide the most up to date information available. A sign-up for newsletter was included on the website during engagement.</p> <p>If there are specific improvements you think are needed, suggestions are welcomed.</p>
<p>Purchased a diesel vehicle in 2014 based on the Government's policy to reduce CO2-emissions at the time. Now the advice has changed. Would have bought a petrol.</p> <p>Can the Council provide advice on a future car to purchase?</p>	<p>The Council is sharing all information it has on required government standards. The most up to date information and advice will be provided.</p> <p>The Council is also hoping to hold engagement events in the future to alternatives to car travel and information on other Council initiatives that encourage greener modes of transport.</p>

5. Summary

5.1 Summary of Feedback

A wide range of comments relating to a Clean Air Charging Zone (CAZ) were received during the February to July 2018. The following list provides a high-level summary of the range of topics included in the feedback. Please note that this is not intended to be a comprehensive or ordered list and should be read alongside the more detailed overview provided in the previous chapters.

- The need for a Clean Air Zone
- Preferred Class of CAZ
- Opportunities for the Clean Air Plan to be part of a bigger plan for Bath
- Fit with existing policy
- Air pollution health impacts
- Impacts on non-compliant vehicle drivers
- Impacts of a CAZ on vulnerable groups
- Economic impacts to local businesses and wider economic concerns
- Opportunities to produce and encourage behaviour change
- Opportunities to improve congestion and traffic flow
- Combined impact of a CAZ and parking policy changes
- Appropriateness of the CAZ boundary
- Which vehicles should be charged
- The operation of a CAZ
- Impact on particular/specific journeys
- ANPR and signage design
- Impact on roads and areas outside of the CAZ (air pollution and congestion)
- The need for and suggested exemptions
- Scheme alternatives
- Alternative non-charging measures
- Suitability of other measures
- The need for public transport improvements
- The need to encourage/improve provisions for active modes of transport and electric vehicles
- The data collection/modelling/scheme assessment process
- The engagement process including presentation of information, format of events and stakeholder involvement.

After considering the feedback, the project team has collated the following concluding messages. These are intended to provide an overview of the feedback and highlight information that is relevant to the Council's CAZ proposals/decisions:

- There was 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 but throughout the area.
- There was some concern among respondents on possible impacts of a CAZ on more vulnerable groups, including low income households, elderly people, 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 congestion reduction measures and traffic flow improvements.
- 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.

5.2 Engagement going forwards

Engagement opportunities will be available throughout the development of the business case, including a formal engagement period after the release of the OBC. This informal engagement period has highlighted specific areas that require attention:

- Further attention will be directed to recording the profile of respondents to improve diversity and broaden the reach of the engagement.
- The need for more feedback from some priority groups including LGV and HGV drivers/operators, low income households and local retailers and other small businesses.

The Council is exploring ways to better engage and communicate with these groups during the next phase.

Appendix A. Organisations Engaged With

Organisations and Groups
Abbey Rise B&B
Access Forum
Age UK BANES
Ainslie's Belvedere and Caroline Place Residents' Association
Air Quality Management Resource centre, UWE
Arleen Coach Hire
Article Bath
Ashma UK
Avon Fire & Rescue Service
B&NES - Strategy & Performance
B&NES cabinet members
B&NES Corporate Disabled Workers Group
B&NES councillors
B&NES fleet
BANES Public Health (including Director)
Bath Abbey
Bath Alliance for Transport and Public Realm
Bath Anti Idling Group
Bath Bus Users Group
Bath Chamber of Commerce
Bath Christian Action Network
Bath Chronicle
Bath City Centre Action Group
Bath City Church
Bath City Football Club
Bath City Forum members
Bath Cricket Club
Bath Deserves Better
Bath Hacked
Bath Live
Bath Living Streets
Bath Meadows Alliance
Bath North East Somerset Clinical Commissioning Group (various contacts)
Bath Preservation Trust
Bath Rugby
Bath Spa University
Bath Stroke support group

Bath Taxi Association
Bath Tourism
Bath Trams
Bath World Heritage Site Advisory Board
Bathampton Parish Council
Batheaston Parish Council
Bathford Parish Council
Bathwick Estate Residents' Association
Bathwick Hill Association
BBC Points West
BBC Radio Bristol
Bear Flat Association
Beech Avenue Association
Berkeley Coach and Travel
Bike Bath
Bristol Bus and Coach
Bristol City Council
British Heart Foundation
British Lung Foundation
BSSEC (Building Services Sustainability and Environmental Consultancy)
Bugler Coaches
Camden Association
Camden RA
Camerton Parish Council
Catharine Place Association
Cavendish Crescent Association
Centurion Travel
Charlcombe Parish Council
Chelwood Parish Council
Chew Magna Parish Council
Chew Stoke Parish Council
Circus Area Residents' Association (CARA)
Claverton Parish Council
Clean Air Team - Friends of the Earth
Clutton Parish Council
Combe Hay Parish Council
Communities, Transport and Environment Policy Development and Scrutiny Panel
Community Transport Association
Compton Dando Parish Council
Compton Martin Parish Council

Confederation of Passenger Transport
Conservatives
Corston Parish Council
Councillors
Cycle Bath
Disabled Motoring UK
Dunkerton & Tunley Parish Council
East Harptree Parish Council
Emergency services
Englishcombe Parish Council
Environmental Services
Environmental Sustainability Partnership
Faresaver
Farmborough Parish Council
Farrington Gurney Parish Council
Federation of Bath Residents Associations
Federation of Small Businesses (FSB)
First Bristol, Bath & West Bus Group
Fitness First
Foxhill Residents' Association
Freight Transport Association
Freshford Parish Council
GPs
Great Western Railway
Green Park Residents' Association
Greener Journeys
Greenpeace Bath
GREENSKY
Greenway Residents Association
Health Bath
Hensley and Egerton Residents' Association (HERA)
Hensley and Egerton Road Association
High Littleton Parish Council
Highways England
Hinton Blewett Parish Council
Hinton Charterhouse Parish Council
Holy Trinity Combe Down
Horizon Methodist Church
Independent Shops of Bath
ITV West Country

Joint Local Access Forum
Kelston Parish Council
Keynsham and district dial a ride
Keynsham Town Parish Council
Lansdown Crescent Association
Liberal Democrats
Living Streets
London Road and Snow Hill Partnership
Lower Oldfield Park Residents' Association
Macaulay Buildings / Prospect Road Association
Mad Max Tours Ltd
Marksbury Parish Council
Marlborough Lane and Buildings Residents Association
Mendip Community Transport
Midsomer Norton Parish Council
Monkton Combe Parish Council
Motorcycle Action Group
National Association of Wedding Car Professionals
Nempnett Thrubwell Parish Council
Network Rail
Newton St Loe Parish Council
NHS (Respiratory)
North Somerset Council
North Stoke Parish Council
Norton Malreward Parish Council
NUS National Union of Students
Other bus operators
Oxfam
Paulton Parish Council
Peasedown St John Parish Council
Priston Parish Council
Public Health England
Publow and Pensford Parish Council
Pulteney Estate Residents' Association
Radstock Town Parish Council
Richmond Road Association
Riverside Community Voice
Road Haulage Association
Roadrunner coaches
Roadrunner Mini Buses

RUH
Safer Routes to School
Saltford Parish Council
Shoscombe Parish Council
Sion Hill Place Association
Smart Minibuses and Taxis of Bath
Somerset Travel
South Gloucestershire Council
South Stoke Parish Council
Southdown Whiteway Church and Community Partnership
Southgate Bath
St Catherine Parish Council
St James Square Bath Ltd
St James's Park cul-de-sac Residents' Association
St Martin's Hospital - Public Health Department
St Michaels Church Bath
St Michaels Church Twerton
St Saviour's Church, Bath
Stanton Drew Parish Council
Stowey Sutton Parish Council
Strategy & Performance - Bath & North East Somerset Council
Sustrans
Swainswick Parish Council
Sydney Buildings Householders Association
Taxi Drivers Forum
Taxi operators
Technology Delivered and Blispa
Temple Cloud with Cameley Parish Council
The Abbey Residents Association TARA
The Breeze FM
The Cavendish Road Society
The Royal Crescent Society
Three Bags Full
Timsbury Parish Council
Transition Bath
Transition Larkhall
Uber
Ubley Parish Council
University of Bath
Upper Oldfield Park Residents' Association

UWE (Air Quality & Carbon Management, and Environment and Sustainability)
Vineyards Residents' Association
Visit Bath
WECA
Wellow Parish Council
West Harptree Parish Council
Westfield Parish Council
Whitchurch Village Parish Council
Widcombe Association
Widcombe Church
Widcombe Infants School
Wiltshire Council

Appendix B. Paper Survey

Paper Feedback Form Used at Drop in 1

If you would like to sign up to our newsletter and other updates, please provide your contact details below:

Name/Organisation: _____

Email address: _____

General feedback

How did you hear about this session?

Did you find this drop-in session useful?

Do you have any comments that would help us with future events?

If you have any queries about the project, please contact us via email at environmental_monitoring@bathnes.gov.uk

The Paper Feedback Form used after Drop in 1 is on the following page

BreATHe



Tackling air pollution in Bath and North East Somerset

Air Pollution in Bath

1. Before today, were you aware that air pollution is a problem in Bath? Yes
☐ No ☐
2. Are you concerned about air pollution in Bath? Yes ☐ No ☐
3. Do you understand why a Charging Clean Air Zone (CAZ) is needed in Bath? Yes ☐ No ☐
4. In principle, do you support a Charging CAZ in Bath? Yes ☐ No ☐
5. What do you see as the biggest benefit/opportunity of implementing a Charging CAZ?

6. What do you see as the biggest concern or challenge to implementing a Charging CAZ?

General feedback

1. Please indicate which of the following (if any) apply to you:
☐ Car driver (for work) ☐ Car owner (non-work use) ☐ Taxi driver ☐ LGV driver ☐ Local business owner ☐ HGV driver
☐ Bristol resident ☐ Bath & North East Somerset resident ☐ Commuter ☐ Tourist
2. Did you find today useful? Yes ☐ No ☐
3. Do you have any thoughts or ideas that would help us improve future events?

Name: _____ Postcode: _____

Organisation: _____

If you would like to sign up to our newsletter and receive updates related to the Clean Air Plan project (including details of upcoming events), please provide your email address below:

Email address: _____

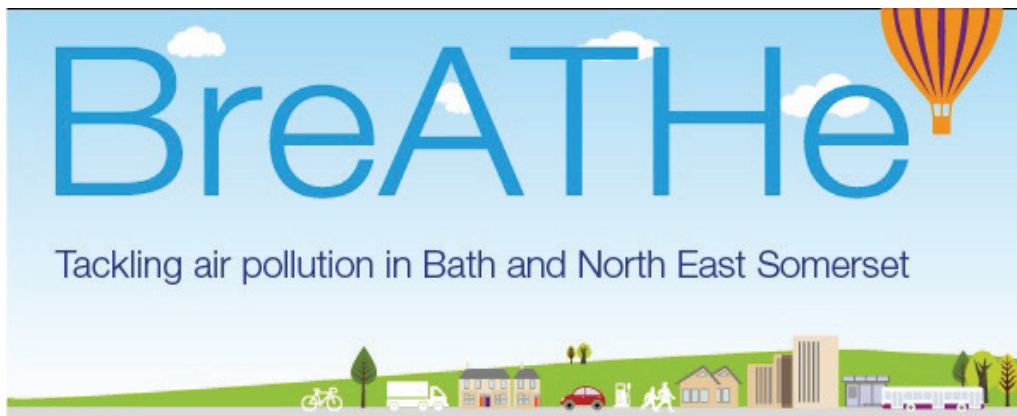
Any personal details given will be stored on a secure server. This data will be held and processed under the terms of the Data Protection Act 1998. Such information may be shared across Bath and North East Somerset Council for the purpose of providing services to you. We will not give information about you to anyone else, or use information about you for other purposes, unless your consent has been given or the law allows this.

If you have any queries about the project, please contact us via email at environmental_monitoring@bathnes.gov.uk

**Bath & North East
Somerset Council**



Appendix C. Online Survey



Air Pollution in Bath

1. Are you aware that air pollution is a problem in Bath?

☐ Yes

☐ No

2. Have you attended a public engagement event?

☐ Yes

☐ No

If yes, which?

3. Are you concerned about air pollution in Bath?

☐ Yes

☐ No

4. Do you understand why a Charging Clean Air Zone (CAZ) is needed in Bath?

☐ Yes

☐ No

5. In principle, do you support a Charging CAZ in Bath?

☐ Yes

☐ No

6. What do you see as the biggest benefit/opportunity of implementing a Charging CAZ?

7. What do you see as the biggest concern or challenge to implementing a Charging CAZ?

8. Any further comments on the Charging CAZ

9. The proposed complementary non-charging measures that work with the Charging CAZ are listed below. Please indicate your support for the measures.

	Strongly Disagree	Don't Support	Neutral	Support	Strongly Support
Provide additional cycle parking across the city centre	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extend walking and cycling priority schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implement reduced residents' parking permit cost for low emission vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote low emission vehicles for Hackney carriages/private hire	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implement public transport route improvements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use Variable Message Signs to promote air quality improvement messages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the usage of Variable Message Signs to provide information about parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted traffic management or improved bus priority on A367 Wells Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sunset period to exempt Euro 5 diesel vehicles to enable longer for upgrades	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make the Traffic Regulation Order (TRO) for the bus lane on London Road permanent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduce electric cycle hire to the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pilot car sharing priority parking areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expansion of car club network in Bath	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

General Feedback

10. Please indicate which of the following (if any) apply to you:

- ☐ Car driver (for work)
- ☐ Car owner (non-work use)
- ☐ Taxi driver
- ☐ LGV driver
- ☐ Local business owner
- ☐ HGV driver
- ☐ Bristol resident
- ☐ Bath & North East Somerset resident
- ☐ Commuter
- ☐ Tourist

11. Name

12. Postcode

13. Organisation

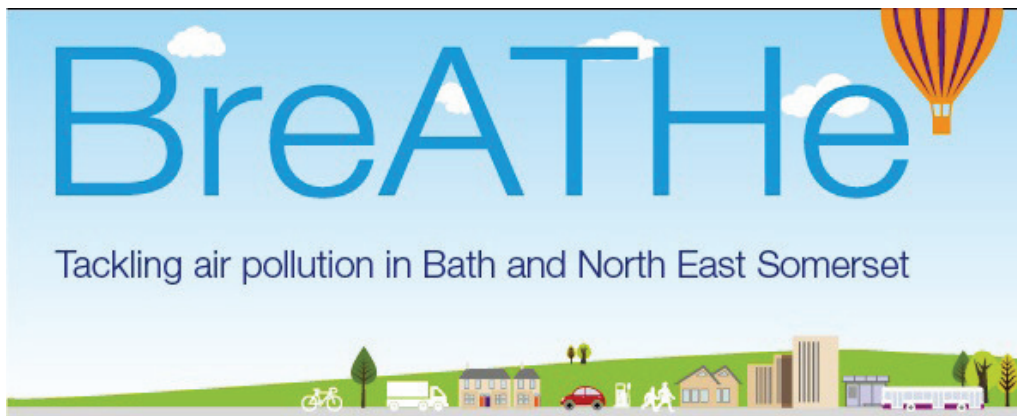
If you would like to sign up to our newsletter and receive updates related to the Clean Air Plan project (including details of upcoming events), please provide your email address below:

14. Email address

Online link to Privacy Statement <http://www.bathnes.gov.uk/disclaimer-and-privacy-statement>

If you have any queries about the project, please contact us via email at environmental_monitoring@bathnes.gov.uk





Air Pollution in Bath

1. Are you aware that air pollution is a problem in Bath?

☐ Yes

☐ No

2. Have you attended a public engagement event?

☐ Yes

☐ No

If yes, which?

3. Are you concerned about air pollution in Bath?

☐ Yes

☐ No

4. Do you understand why a Charging Clean Air Zone (CAZ) is needed in Bath?

☐ Yes

☐ No

5. In principle, do you support a Charging CAZ in Bath?

☐ Yes

☐ No

6. What do you see as the biggest benefit/opportunity of implementing a Charging CAZ?

7. What do you see as the biggest concern or challenge to implementing a Charging CAZ?

General Feedback

8. Please indicate which of the following (if any) apply to you:

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☐ Car owner (non-work use)

☐ Taxi driver

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☐ Local business owner

☐ HGV driver

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