



Bath Clean Air Plan

Bath and North East Somerset Council

OBC Report on Formal Public Consultation

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January 2020



Bath Clean Air Plan

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Appendix A. Copies of Consultation Materials

Appendix B. Copies of the Questionnaires

Appendix C. Analysis of Data from the Questionnaires

Acronyms and Abbreviations

ANPR	Automatic Number Plate Recognition
AQO	Air Quality Objectives
B&NES	Bath and North East Somerset Council
BEMSCA	Black and Ethnic Minority Senior Citizen Association
BID	Business Improvement District
BVRLA	British Vehicle Rental and Leasing Association
CAP	Clean Air Plan
CAZ	Clean Air Zone
DEFRA	Department of Food and Rural Affairs
DfT	Department for Transport
EU	European Union
FBC	Full Business Case
FOBRA	Federation of Bath Residents Associations
HGV	Heavy Goods Vehicle
JAQU	Joint Air Quality Unit
LAQM	Local Air Quality Management
LEZ	Low Emissions Zone
LGV	Light Goods Vehicle
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
OBC	Outline Business Case
PERA	Pulteney Estate Residents Association
PHEV	Plug-In Hybrid Electric Vehicles
PM	Particulate Matter
RPZ	Residents' Parking Zone
RUH	Royal United Hospital Bath
SMMT	Society of Motor Manufacturers and Traders
SOC	Strategic Outline Case
UK	United Kingdom
ULEV	Ultra-Low Emission Vehicle
ULEZ	Ultra-Low Emission Zone
WECA	West of England Combined Authority
WHS	World Heritage Site

1. Executive Summary

Context and format of consultation

Bath and North East Somerset Council (B&NES), along with 27 other local authorities, has been directed by Minister Therese Coffey and Minister Jesse Norman to produce a Clean Air Plan (CAP) to achieve air quality improvements in Bath in the shortest possible time. In line with Government guidance B&NES is considering the implementation of a Clean Air Zone (CAZ) as part of the CAP, to achieve compliance with legal Nitrogen Dioxide (NO₂) limits.

This report summarises the feedback received from a six-week formal consultation, which ran from 16th October to 26th November 2018, on a proposal to implement a Class D charging CAZ in Bath. A Class D CAZ would charge higher emission cars, Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs), buses and taxis to travel within the city centre. This consultation was undertaken in the context of a complex project within which there are a number of fixed constraints governing the actions of the Council. Therefore, there are limits on what is negotiable and the ability to act on feedback.

The constraints include:

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

In this context, the aim of the consultation process was to provide an opportunity for discussion between the Council and any persons concerned about the proposals or their impacts. It also provided a forum for the sharing of information and ideas on how any issues could potentially be resolved. In particular, it focussed on seeking comments on how the proposed Scheme could be refined, in order to:

- Improve its effectiveness in tackling air quality issues;
- Help to mitigate any potential impacts either on specific groups or locations; and
- Better support the community and road users to adapt and adjust.

A range of information was published on the Council's website to support the six-week consultation period. This included: a non-technical summary document providing an overview of the proposals, a series of frequently asked questions with responses and the full suite of technical documents. In addition, a series of events were held to provide members of the public, businesses and organisations with an opportunity to talk face to face with the project team about the proposals. Feedback was submitted via two questionnaires, one for individuals and groups, and one for businesses. Letters and emails were also submitted direct to the Council.

Overview of feedback provided

The feedback received was very varied. Many respondents recognised the need to improve air quality in Bath and some of the feedback demonstrated support for action to tackle these issues. However, some of the feedback highlighted concerns about a charging scheme in principle and many comments were made about the details of the proposed Scheme.

Those who expressed their general support for the principle of a charging zone, or a Class D CAZ in particular, did so because they:

- Recognised that the Scheme could deliver improvements in air quality to their immediate area;
- Appreciated the wider benefits in terms of public health;

- Recognised air quality had been a problem for some time, and needs to be addressed;
- Supported measures to tackle issues related to traffic volumes and congestion; and
- Felt that the proposed Scheme could help to improve the attractiveness of Bath as a place to live and as a destination for work and leisure.

However, the importance of getting the details of the CAZ right was acknowledged and many (including some of those who supported the overall Scheme) felt that further adjustments were required. Those who expressed concern about the proposed Scheme or outlined suggestions for consideration raised the following issues in particular:

- Issues relating to the detail of the proposed boundary. Some respondents felt that the proposed zone was too large, and that the routes through Bath including the A4 and A36 should not fall within the zone. Others called for the zone to be enlarged so that the perceived benefits could extend across a wider area. This would also ensure that these areas would not be used as rat-runs for vehicles trying to avoid the charging zone, or experience additional pressure for parking, as people park on the edge of the zone to walk into town.
- Comments about the financial implications of charging, particularly for residents living within the proposed zone and people who travel into the city centre for work or local services, including shopping and medical appointments. Respondents expressed concerns about the potential for the CAZ to have a disproportionate impact on vulnerable groups e.g. small businesses and low-middle income households.
- Concerns that a Class D CAZ should be supported by a wider range of concessions or exemptions to assist specific groups or users of certain vehicles. Or that alternative means/levels of charging should be considered to help mitigate the impacts.
- Concerns that the public transport system currently does not offer a reasonable alternative option for many people, and therefore this will limit the ability of people with non-compliant vehicles to use other modes.
- Questions about the economic impact of the CAZ on Bath as a whole and specifically on businesses, particularly small businesses and those reliant on diesel vehicles, where options to change vehicle may be more limited and expensive than for other users.
- Concern that the CAZ may lead to re-routing across the wider area because there is a lack of alternative routes for traffic to route around Bath.
- Questions over whether a Class D CAZ is the most appropriate approach and suggestions for alternative ways of tackling air quality.

Implications and next steps

The themes and issues arising from the consultation feedback will be considered in the context of the Government direction (which requires the Council to reduce air pollution in the shortest time possible) and in relation to the overall objectives and scope of this project. Where appropriate, the feedback will be used to inform additional technical analysis to assess the various options and suggestions put forward.

A decision on next steps lies with elected Cabinet Members and the Government (via JAQU, who will scrutinise all proposals). The consultation comments are one of a wide variety of considerations that will influence this decision. The comments will be balanced against the findings of technical work, issues relating to funding and deliverability and overall ability to comply with the legal directive.

Consideration of the consultation feedback will however remain ongoing throughout the development of the CAZ Scheme and during implementation.

2. 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.

2.1 Purpose of this report

This report summarises the feedback received from a six-week formal consultation, which ran from 16th October to 26th November 2018, on a proposal to implement a Class D charging CAZ in Bath. The report provides information on:

- The format of the consultation, including the consultation materials published and the events held;
- The overall number of responses received;
- The quantitative data generated by the questionnaires;
- The qualitative feedback given via questionnaires; and
- The feedback received via letters and emails.

This report is intended to be a stand-alone document. It provides a factual overview and summary of the comments, issues and concerns highlighted during the consultation.

2.2 Context and background

2.2.1 Government Directive on Air Quality

The United Kingdom (UK) has in place air quality legislation, passed down from the European Union (EU), to ensure that certain standards of air quality are met. The legal limit for concentrations of NO₂ is 40 µg/m³ as an annual mean. This legal limit is breached across a number of cities in the UK, including at several locations in Bath.

Bath and North East Somerset Council (B&NES), along with 27 other local authorities, has been directed by Minister Therese Coffey and Minister Jesse Norman to produce a Clean Air Plan (CAP) to achieve air quality improvements in Bath in the shortest possible time. In line with Government guidance B&NES is considering the implementation of a Clean Air Zone (CAZ) as part of the CAP, to achieve compliance with legal Nitrogen Dioxide (NO₂) limits.

2.2.2 Identification of a Class D CAZ as the preferred option

Early work on the development of the CAP was reported in the Strategic Outline Case (SOC) published in March 2018. This identified a short list of options with the potential to address Bath's air quality issues. These

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)

options were subject to further technical assessment and were reported in a draft Outline Business Case (OBC), published in October 2018.

The OBC identified a Class D charging CAZ, alongside a number of supporting measures, as the option most likely to achieve the required improvements in air quality within the required timescales. The proposed Class D CAZ would mean charging drivers of all higher emission vehicles – including buses, coaches, HGVs, LGVs/vans, private hire vehicles, taxis and cars - to drive in the proposed zone, as follows:

- £9 for higher emission (pre-Euro 4 petrol and pre-Euro 6 diesel) cars, taxis, private hire vehicles and LGVs/vans; and
- £100 for higher emission (pre-Euro 4 petrol and pre-Euro 6 diesel) buses, coaches and HGVs.

The preferred Scheme identified the boundaries of the proposed Class D CAZ, as shown on Figure 2-1. The OBC formed the basis of the formal public consultation undertaken between 16th October and 26th November 2018.

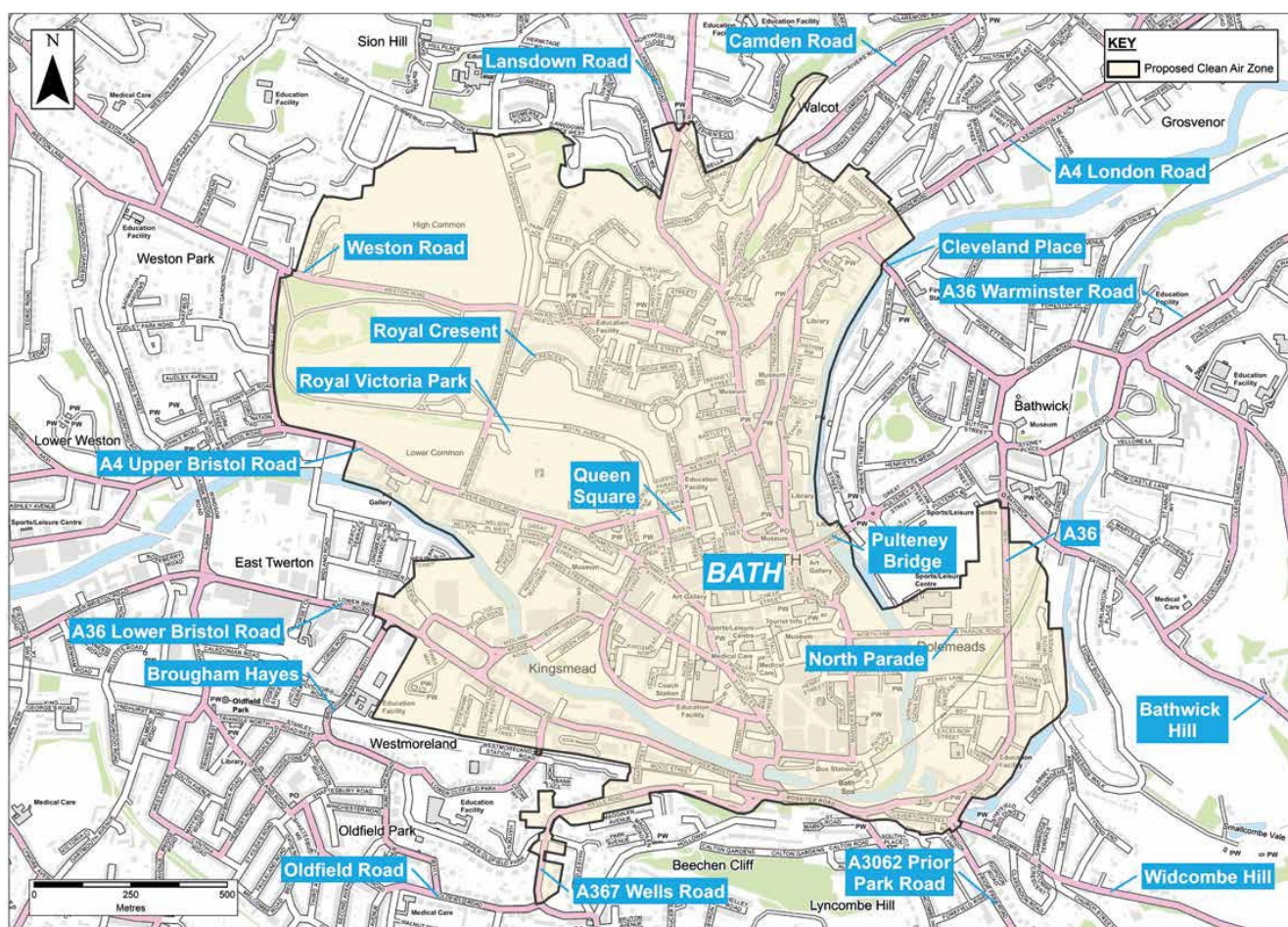


Figure 2-1 – proposed boundary for a Class D CAZ

2.2.3 Objectives

The Class D CAZ was identified during the OBC process as the option most likely to achieve the following two primary objectives:

- 1) To deliver a Scheme that leads to compliance with NO₂ concentration Limit Values⁴ in the shortest time possible; and

⁴ European Union (2008) *Directive 2008/50/EC: on ambient air quality and cleaner air for Europe Annex III*, Official Journal of the European Union. <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:32008L0050>

- 2) To deliver a Scheme which leads to compliance with the Local Air Quality Management (LAQM) Air Quality Objectives (AQOs)⁵ for NO₂ concentrations.

The CAZ was also considered in terms of the following supplementary objectives:

- Demonstrating value for money;
- Demonstrating an evidence-based justification for the intervention, based on real-time local evidence of air quality, emission sources, and levels of air pollution in Bath. Any improvements demonstrated in air quality would be directly linked to improvements in public health;
- Minimising the impacts on local residents and businesses, including disadvantaged groups such as low-income households; and
- Minimising the impacts on economic growth and development in Bath, thus helping to accelerate the transition to a low emission economy and creating a healthy place to live, visit and work.

In reviewing the consultation feedback, it is important that consideration continues to be given to these overall objectives. Any potential changes to the proposed Scheme need to be assessed in terms of their ability to help deliver the overall objectives.

2.3 The consultation process

2.3.1 Consultation and engagement objectives

B&NES has committed to engaging the public and stakeholders at every stage of the development of the CAP and the future implementation of a CAZ. The aim of the consultation and engagement process is to ensure everyone in the area has an opportunity to express their views and share opinions. The consultation and engagement objectives are to:

- Have ongoing dialogue with stakeholders, residents, businesses 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; and
- Seek feedback at key stages of the Clean Air Plan and, where possible, utilise this in the technical assessment.

2.3.2 Previous consultation

During the development of the SOC, and in the period following its publication, the Council facilitated a range of engagement events and activities to explain the process of the CAP 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 CAP.
- Following the publication of the SOC in April 2018, engagement focussed on continuing a conversation on air quality, and seeking feedback on the short-listed packages of measures identified.

The feedback that was generated at this stage is reported in 674726.BR.42.OBC-24 Engagement Report in Appendix O of the OBC.

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

Further information and the feedback generated can be found in 674726.BR.42.OBC-24 Engagement Report in Appendix O of the OBC.

2.3.3 Formal consultation

The OBC was published on 16th October 2018, the proposal it describes formed the basis of the six-week formal consultation. This consultation was undertaken in the context of a complex project within which there are a

⁵ Set out in the Air Quality (England) Regulations (SI 2000/ 928 as amended)

number of fixed constraints governing the actions of the Council. Therefore, there are limits on what is negotiable and the ability to act on feedback. The constraints governing the actions of the Council include:

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

In this context the aim of the consultation process was to provide an opportunity for discussion between the Council and any persons concerned about the proposals or their impacts. It also provided a forum for the sharing of information and ideas on how these issues could potentially be resolved. Given that the Council is mandated to take action on air quality, and that there are limited options for reducing emissions to below the legal limits, the main focus of the consultation was on teasing out comments relating to how the preferred option of a Class D CAZ and the proposed package of supporting measures could be refined to:

- Improve their effectiveness in tackling air quality issues;
- Help to mitigate any potentially impacts either on specific groups or locations; and
- Better support the community and road users to adapt and adjust.

This report sets out the feedback received during the consultation period.

2.4 The decision-making process

As noted above, B&NES is legally bound to take action to tackle air quality issues in the shortest possible time.

All decisions on the CAP and any measures to be implemented to improve air quality will be taken by local elected Members, via the B&NES Cabinet. This decision will consider Officer recommendations and take account of:

- The legal direction of the Council;
- The overall objectives of the CAP;
- Government guidance, including DEFRA's Clean Air Zone Framework;
- The Equalities Impact Assessment;
- Feedback from Government through JAQU;
- The availability of funding;
- The economic and financial impacts of any actions;
- The results of technical assessments and modelling; and
- The feedback received during the consultation process.

Once a decision is made by the Cabinet, implementation of any measures will be dependent upon:

- JAQU's approval of an FBC (effectively the document required to secure the funding to implement the Scheme)
- Completion of any legal requirements.

2.5 Structure of this report

The structure of this report is as follows:

- Chapter 3 provides an overview of the consultation activities;
- Chapter 4 provides an overview of the respondents to the individuals questionnaire;
- Chapter 5 provides an overview of the respondents to the business questionnaire;
- Chapter 6 provides an overview of the overarching comments received about the proposed Scheme;
- Chapter 7 provides an overview of comments concerning the proposed CAZ boundary;
- Chapter 8 provides an overview of comments concerning the effectiveness of the proposed CAZ charge;
- Chapter 9 provides an overview of comments relating to the proposed concessions and exemptions;
- Chapter 10 provides an overview of comments relating to how the CAZ may influence travel behaviour;
- Chapter 11 provides an overview of comments relating to the proposed supporting measures (to be delivered alongside the CAZ);
- Chapter 12 provides an overview of comments concerning specific groups that may be affected by the CAZ;
- Chapter 13 provides an overview of suggestions for alternative ways to tackle air quality;
- Chapter 14 provides an overview of other comments;
- Chapter 15 provides an overview of comments submitted by groups and organisations;
- Chapter 16 provides an overview of comments on the consultation process; and
- Chapter 17 includes a summary, conclusions and next steps.
- Chapter 18: Appendices

3. Overview of Consultation Activities

This Chapter provides an overview of the activities that supported the six-week consultation period on the proposed Class D CAZ, between 16th October and 26th November 2018, and the types of feedback this generated.

3.1 Consultation materials

The consultation was launched on 16th October. A press briefing was held on the same day and the following information was published on the Council's website:

- An 8-page summary brochure (included as Appendix A), which included a description of the decision-making process, a map of the proposed CAZ boundary and details on the proposed concessions, exemptions and supporting measures.
- A short video providing an overview of the proposal;
- The full suite of OBC documents, including a range of technical appendices;
- Two online feedback forms, one for individuals and one for businesses (included as Appendix B); and
- A range of information to summarise the technical proposal and a list of frequently asked questions.

In addition, printed versions of the summary brochure and hard copies of the questionnaire for individuals were distributed to local libraries and One Stop Shops. Full printed copies of the full draft OBC were also made available in libraries. Postcards were sent to all households and businesses within Bath and North East Somerset (a copy is included as Appendix A).



3.2 Public consultation events

A range of events were held during the six-week consultation period, to provide opportunities for people to ask questions about the proposals and find out more information. These took the form of:

- Drop-in sessions held in public locations. These sessions were open to all, with no booking required, and provided an opportunity for people to speak informally with members of the project team; and
- Pre-bookable surgery sessions. These offered the opportunity for anyone with detailed or technical questions or concerns, to book a one-to-one, thirty-minute meeting with members of the project team.

These events were advertised on the project webpages, in newsletters, newspapers and via social media posts. Specific invitations were also sent to stakeholders, community groups and organisations via email.

A list of the public consultation events and approximate number of attendees is shown in Table 3-1.

Table 3-1: Overview of the 19 public consultation events held

Event	Date	Time and location	Approximate number of attendees
Drop in	17/10/2018	16:00 - 20:00, Guildhall, Bath	100
Surgery	17/10/2018	16:00 - 20:00, Guildhall, Bath	7
Surgery	20/10/2018	10:00 - 14:00, Guildhall, Bath	5
Drop in	24/10/2018	16:00 - 20:00, Guildhall, Bath	150
Surgery	24/10/2018	16:00 - 18:00, Guildhall, Bath	7
Drop in	27/10/2018	10:00 - 14:00, Keynsham Community Space	40
Surgery	27/10/2018	10:00 - 14:00, Keynsham Community Space	3
Drop in	31/10/2018	16:00 - 20:00, Guildhall, Bath	90
Surgery	31/10/2018	16:00 - 18:00, Guildhall, Bath	4
Drop in	07/11/2018	16:00 - 20:00, Midsomer Norton Townhall	35
Surgery	07/11/2018	16:00 - 20:00, Midsomer Norton Townhall	3
Drop in	10/11/2018	10:00 - 14:00, Guildhall, Bath	80
Surgery	10/11/2018	10:00 - 14:00, Guildhall, Bath	8
Drop in	14/11/2018	16:00 - 20:00, Widcombe Social Club	95
Surgery	14/11/2018	16:00 - 18:00, Widcombe Social Club	8
Drop in	21/11/2018	16:00 - 18:00, Widcombe Social Club	88
Surgery	21/11/2018	16:00 - 18:00, Widcombe Social Club	8
Drop in	24/11/2018	10:00 - 14:00, Guildhall, Bath	77
Surgery	24/11/2018	10:00 - 14:00, Guildhall, Bath	8

3.3 Meetings with organisations and groups

The project team attended (on request) a range of additional meetings and briefing sessions with groups and organisations. These are summarised in Table 3-2.

Table 3-2: Additional meetings held

Meeting with	Date
Councillors/Council meetings	
Cllr Briefing	16/10/2018
Cllr Briefing	18/10/2018
South Gloucestershire Council	24/10/2018
Wiltshire Council	31/10/2018
Leading Together Management Briefing	18/10/2018
Managing Together Management Briefing	22/10/2018
Communities, Transportation and Environment Scrutiny Panel meeting	29/10/2018
Parish and Town Council meetings	
Parish Liaison Meeting	24/10/2018
Bath City Forum	13/11/2018
Cam Valley Forum	21/11/2018
Bathavon North Forum	22/11/2018
Somer Valley and Keynsham Area Forum meetings were attended prior to the public consultation as these meeting cycles did not fall within the consultation period	
Residents groups	
Pulteney Estates Residents Association	24/10/2018
Camden Residents Association	24/10/2018
Beech Avenue Residents Association	26/10/2018
Bathwick Residents Association	01/11/2018
Transition Larkhall	07/11/2018
Bathwick Residents Association	08/11/2018
Combe Down Residents meeting	12/11/2018

Meeting with	Date
Transition Larkhall public meeting	12/11/2018
Pulteney Estates Residents Association	14/11/2018
Westmoreland Residents meeting	15/11/2018
Bathampton Residents meeting	17/11/2018
Oldfield Park Residents meeting	19/11/2018
Twerton Residents meeting	20/11/2018
St John's Road Residents meeting	20/11/2018
FoBRA (Federation of Bath Residents Associations)	26/11/2018
Business/groups	
Press Briefing	16/10/2018
Bath HACKED event	20/10/2018
Bath Independent Traders meeting	23/10/2018
Independent Traders meeting	29/10/2018
Representatives of the building trade	31/10/2018
Society of Motor Manufacturers and Traders (SMMT)	08/11/2018
Representatives of the building trade	12/11/2018
Client Earth meeting	13/11/2018
Road Haulage Association	14/11/2018
Community groups	
Percy Community Centre	26/10/2018
3SG Workshop with Community Transport providers	06/11/2018
Age UK	07/11/2018
St John's Hospital	08/11/2018
Black and Ethnic Minority Senior Citizen Association (BEMSCA) meeting	09/11/2018
Off the Record Charity	14/11/2018
B&NES Children's Centre	14/11/2018
Black and Ethnic Minority Senior Citizen Association (BEMSCA) meeting	16/11/2018
Royal United Hospital (RUH) and Virgin Care	21/11/2018
GLL (Bath Leisure Centre)	21/11/2018
Bath Christian Action Network	23/11/2018
Bath Food Bank	23/11/2018
Transport Operators	
Bath Taxi Association	14/11/2018

3.4 Press and social media coverage

During the consultation period there was coverage in both the press (television, newspaper and online publications) and on social media. The Council briefed the press, issued press releases and promoted the consultation through its own social media accounts. Coverage was also initiated by other external groups and organisations.

Views expressed via the press or social media are not considered in this report.

3.5 Feedback generated

The consultation generated feedback in a variety of formats as shown in Table 3-3.

Table 3-3: Feedback received

Format of response	Individuals and organisations	Businesses
Online questionnaires	7308	567
Hard copy questionnaires (note: these were then manually entered into the online system)	300	n/a

Letters and emails	275	12
Total number received	7883	579
Total number of feedback responses: 8462		

The Council is also aware of two petitions:

- A formal petition from Clean Air for Bathwick, containing 45 signatures requesting for the Bathwick area to be included in the CAZ. This was submitted to the Council as part of the consultation process; and
- An online petition, with over 5,000 signatures, expressing concern about the financial implications of the CAZ for people on lower incomes and urging the Council to consider other alternatives. Note that to date this has not been formally submitted to the Council, but it is referenced in this section to acknowledge that a significant number of people have expressed their concerns about the Scheme in this way.

3.5.1 Feedback from the questionnaires

Copies of the consultation questionnaires used to generate feedback are included in Appendix B. Two versions were prepared, one for individuals and one for businesses. Each questionnaire included a combination of multiple choice and free text questions. Each Question was accompanied by summary information, helping the respondent to understand each aspect of the proposal. The comments from the hard copy questionnaires were manually entered into the online system.

Chapters 4 and 5 give an overview of each questionnaire and provide a profile of the respondents. The detailed feedback provided by respondents via the questionnaires, letters and emails is then summarised on a topic by topic basis in Chapters 6 to 15.

3.5.2 Approach to analysis of questionnaire feedback

The feedback received from the questionnaires has been analysed, summarised and presented depending on its original format.

- **Quantitative data** – Responses to multiple choice questions from the questionnaires are reported factually and in numerical format.
- **Qualitative data** – The majority of the feedback provided via the questionnaires was qualitative in nature, written within open text responses. This has been analysed using the method described below, to help facilitate production of a manageable overview of all the feedback provided.

3.5.2.1 Qualitative data

To effectively process the large volume of qualitative feedback, a system of categorising and grouping comments was adopted. Comments were allocated to categories, on a question by question basis. The categories were defined based on the nature and type of the comments received, not on the pre-defined topics, meaning the system of grouping comments responded directly to the feedback provided. The categorised and grouped comments were then used in the preparation of the summary text presented in the following Chapters of this report.

Where comments made within a particular question did not relate specifically to the topic of that question, these comments were reallocated to the most appropriate question and reported alongside the main feedback provided in that part of the questionnaire. For example, if a comment made within Question 1, which focussed on the CAZ boundary, made suggestions for additional concessions, the part of the comment about concessions was reallocated to Question 7.

3.5.2.2 Quantitative data

The quantitative data generated by the closed questions within the two questionnaires was analysed in a number of ways.

In each case the raw data, as generated by the Survey Monkey questionnaire, was tabulated and reported in its original state. For transparency this data is presented within the following Chapters and Appendices in a factual way.

The various datasets were then further interrogated to aid additional understanding. In some cases, multiple questions relating to similar topics were cross referenced in order to identify sub-sets of data which could then

be cross tabulated against other topics. For example, data representing drivers who would, based on the information given in answer to multiple questions, be charged to enter the CAZ was identified and then cross tabulated against data provided in other questions, such as opinions on how effective the proposed charges were perceived to be in encouraging behaviour change. Similarly, cross tabulations were undertaken to identify trends depending on where respondents lived, or how often they would drive in the zone.

Within Chapter 7 to 13 this data is presented in summary form, with further detail contained within Appendix C.

3.5.3 Feedback from letters and emails

Feedback from letters and emails was considered in a similar way to that received via the qualitative questions of the questionnaires. Comments were summarised and reported in the corresponding topic chapter, alongside the data from the qualitative questions of the questionnaires. An overview of the letters and emails received from larger organisations and businesses are further reported in Chapter 15.

4. Overview of Respondents to the Questionnaire for Individuals and Groups

4.1 Overview

This Chapter provides a profile of the respondents who completed the questionnaire for individuals and groups. It reports on the closed text questions relating to respondent characteristics, their vehicle and the way they travel. It should be read in conjunction with Appendix C, which provides further detail on how the dataset was analysed and includes full data reporting.

Detailed comments made on key topics are presented in Chapters 7 to 15. These Chapters include a summary of the responses to the open text questions, alongside any related closed text questions.

A copy of the questionnaire for individuals and groups is included in Appendix B. The questionnaire contained the following questions:

- **Question 1** asked whether respondents had any suggestions on changes to the proposed CAZ boundary.
- **Questions 2 and 3** asked whether respondents felt that the proposed charges for entering the CAZ would encourage behaviour change and whether there are any alternative charges that the respondent felt would be more effective in helping to meet air quality targets.
- **Question 4** helped the respondent to establish whether their vehicle would be compliant or exempt.
- **Questions 5, 6 and 7** asked which concessions would apply to their vehicle and sought feedback on any further concessions that would be important to the group that they represent.
- **Question 8** asked how the CAZ would change the way respondents will travel.
- **Questions 9, 10 and 11** asked respondents to rank which supporting measures would be a priority for them and whether there are any further supporting measures that they would suggest.
- **Question 12** asked how respondents believed that particular groups would be impacted by the CAZ.
- **Question 13** asked whether respondents had any further comments on the proposal, including whether they could suggest any alternative approaches to meeting air quality targets.
- **Questions 14 to 23** asked for more information about the respondent including whether they were responding on behalf of an organisation, whether they drive, how often they drive through the proposed zone, postcode, etc.

Within this Chapter, Question numbers are referenced in accordance with the online version of the questionnaire (as it is noted that the questions were numbered differently on the hard copy version).

4.2 Survey size and response rate

The questionnaire for individuals and groups received 7608 responses. The majority of questions saw a response rate of over 70%.

- Question 2, which related to the effectiveness of the proposed charge, received the highest response rate, with 96% of all respondents answering the question.
- Question 11 was the least responded to question, where respondents were asked to prioritise supporting measures or suggest a measure that might help them or a group they represent adapt to the CAZ, with only 43% of respondents answering this question.

4.3 Respondent type

This Section details the type of respondent using the following data: who the respondent was responding on behalf of (Question 14), home location of respondent (Questions 17 and 18), working status of respondents (Question 19) and additional information about respondents (Questions 20 to 23) relating to age, dependent children, long term health conditions and gender. It should be read in conjunction with Appendix C, which provides further detail on how the dataset was analysed and contains full data reporting.

4.3.1 Respondent Type

Of the 6650 respondents that answered Question 14, which asked '*Are you responding*' (on behalf of):

- The majority (97%) stated they were answering on behalf of themselves and/or their family;
- The remaining respondents identified as representing a group of individuals or other. The organisations, that could be identified, that responded to the questionnaire for individuals and groups are shown in . It should be noted that some of these groups also submitted a letter or email.
- Table 4-1. It should be noted that some of these groups also submitted a letter or email.

Table 4-1: Organisations that responded to the questionnaire for individuals and groups.

Organisations that Responded to the Questionnaire for Individuals and Groups		
Age UK	Client Earth	Rolfey's of Bath
B&NES Green Party	Contact the Elderly	Scout Cubs Southdown
B&NES Labour Group	Councillor for Bathwick Ward	South Stoke Parish Council
Bath Business Improvement District (BID)	Councillor for Oldfield Ward	South West Ambulance Service Trust
Bath Canoe Club	Foxhill Residents Association	South West Transport Network
Bath Soup Run & Street Pastors	Friends of Sydney Gardens	South Wraxall Parish Council
Bath Spa Band	Great Pulteney Street Residents	Southwick Parish Council
Bath Tours	Greenway Residents Association	Southwick Residents Association
Bathwick Estate Residents Association	Hilperton Parish Council	St. Barnabas Church
Bathwick Hill Residents Association	Hinton Charterhouse Parish Council	Sydney Buildings Householders Association
Bear Flat Association	Keynsham Mencap Society	Sydney Place Residents Association
Bitton Parish Council	Monkton Farleigh Parish Council	The Cavendish Road Society
Bluebird Care Bath	Motorcycle Action Group	The Federation of British Historic Vehicle Clubs
Bradford on Avon (Unitary Authority Member of Wiltshire Council)	North Bradley Parish Council	The Salvation Army Bath Citadel
Bradford on Avon Streets Ahead	North Road Residents	Timsbury Parish Council
Bradford on Avon Town Council	Off the Record Charity	Transition Larkhall
Bus Users UK	Parish of South Stoke and Midford	Trowbridge Area Board (Elected Councillors)
Camden Residents Association	Pulteney Estates Residents Association	Walking Fit Club
Charlcombe Toad Patrol	Quoins Organic Vineyard	Widcombe C of E Junior School Governors
Circus Area Residents Association	RAC Motoring Services	Winsley and Westwood Electoral Division of Wiltshire Council
	Radstock Town Council	Women's Institute

4.3.2 Home Location of Respondents

The questionnaire was completed by a cross section of people from different areas. Of the 6517 respondents that answered Question 17, which asked where the respondent lives:

- 9% stated that they live within the proposed zone;
- 55% stated that they live in Bath but outside the zone;

- 18% stated they live in B&NES but not in Bath; and

15% stated they live outside of B&NES.

Figure 4-1 shows a more detailed breakdown of the home location of respondents using data from Question 18, where respondents were asked to enter the first four digits of their postcode.

- The area with the most respondents was between Bathwick and the University of Bath with 484 respondents;
- This was followed by Lyncombe (332), Oldfield Park (303) and Camden (303) which are located on the edge of the proposed zone;
- Areas on the periphery of Bath were also well represented; Odd Down (236), Combe Down/Foxhill (197) and Batheaston (195);
- Other areas with larger numbers of respondents were Newbridge (182), Lansdown (174), Twerton (165) and Weston (138); and
- Outside of B&NES (see Appendix C) there were respondents from across the South of the United Kingdom.

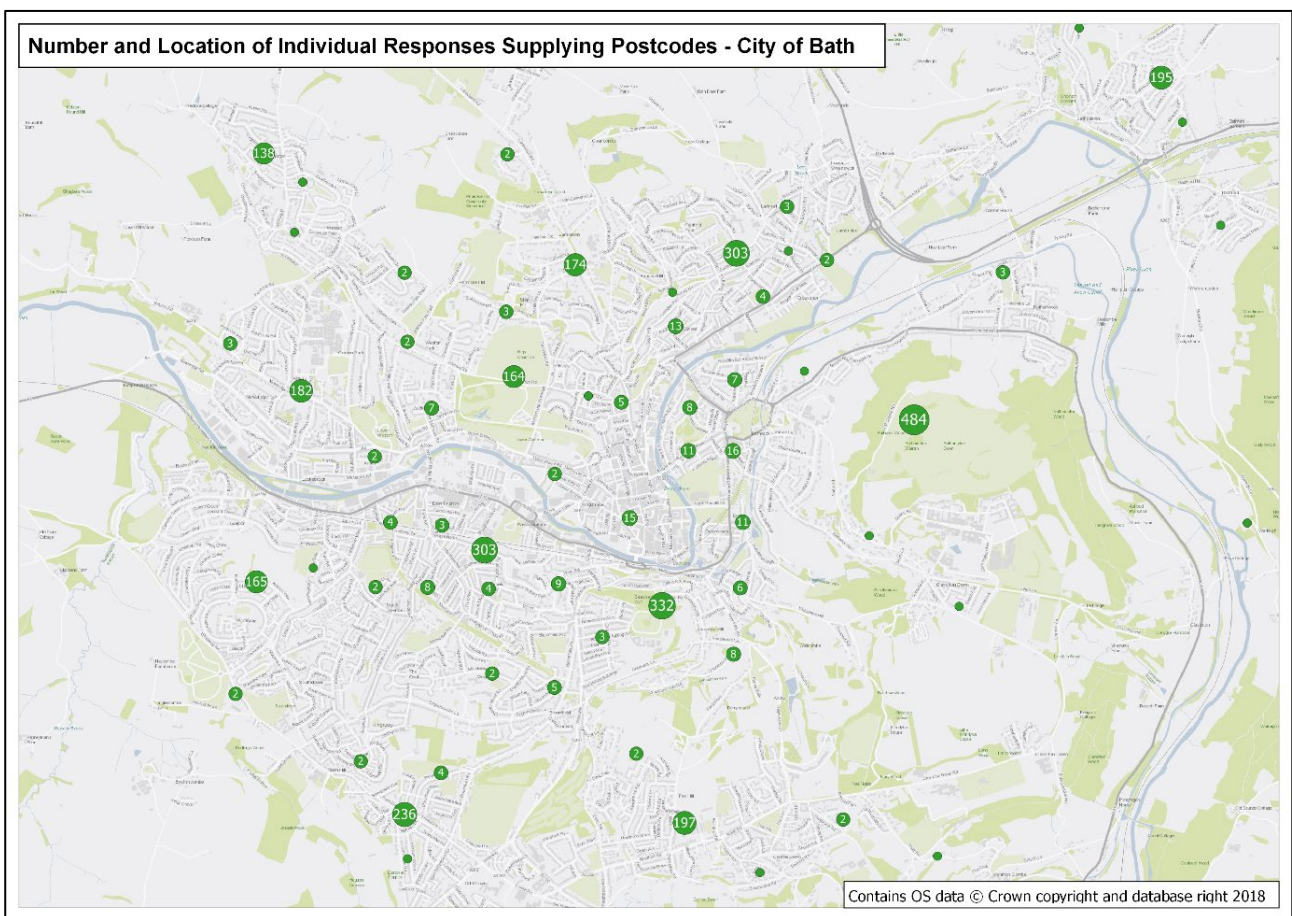


Figure 4-1: Number and Location of Individual Responses Supplying Postcodes – City of Bath

4.3.3 Professional or Working Status

Question 19 asked '*What would best describe your professional or working status?*'. Of the 6614 respondents that answered Question 19:

- 66% stated that they were employed, this includes self-employed;
- 26% of respondents stated that they were retired;
- 5% preferred not to say; and
- There was also representation from students and those who are not in work.

4.3.4 Age

Of the 5956 respondents to Question 20 which asked, *'What was your age at your last birthday?'*:

- 7% were under the age of 29;
- 15% were between the ages of 30 and 39;
- 42% were between the ages of 40 and 59;
- 30% were between the ages of 60 and 79; and
- 3% were aged 80 or over.

4.3.5 Dependent Children

Question 21 asked *'Do you have any dependent children?'*. Of the 6546 respondents that answered Question 21:

- The majority, 57%, stated that they did not have any dependent children.

4.3.6 Identify as having a long-term condition limiting day to day activities

Question 22 asked *'Do you consider yourself to have a long-term condition that limits your day-to-day activities?'*. Of the 6565 respondents that answered Question 22:

- 13% indicated they have a long-term condition that limits their day to day activities.

4.3.7 Gender

Of the 6571 respondents to Question 23, which asked *'How do you define your gender?'*:

- 46% were male and 44% were female.

4.4 Driver Status

This Section reports on the responses provided by respondents to Questions 4 (exemptions and minimum emission standards), 5 (concessions), 15 (driver status) and 16 (driving regularity). Questions 4 and 5 were designed to help respondents understand if their main vehicle would be charged in 2 years' time. This data was used alongside information provided on their driver status (Question 15) to understand whether a respondent driver would or would not be charged.

- Of the 6644 respondents that answered Question 15 asked *'Do you drive a vehicle?'*, 93% indicated that they drove a vehicle;
- Of the 6633 respondents that answered Question 16, *'How often do you drive into or through the proposed zone in Bath?'*, 22% indicated that they drove into the proposed zone daily, 37% several times a week and 33% once a week or less.

4.4.1 Minimum Emissions Standards and Proposed Exemptions

Question 4 asked: *'Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, please indicate whether your main vehicle would fall into any of the categories listed below and therefore not be charged'*. See Appendix B for the full list presented in the questionnaire.

Of the 6577 respondents that answered Question 4, 377 respondents selected multiple options, possibly because they mis-read the question or own or use multiple vehicles. However, the question was specifically asking about the respondent's main vehicle.

Data was cleaned so that respondents that ticked multiple answers were only counted once, and only those respondents who selected that they drove a vehicle or skipped Question 15 were included within the dataset, to give a dataset representing drivers. This removed data from 83 respondents.

Data from the 6494 respondents that answered Question 4 with responses that could be reasonably analysed shows that in two years' time:

- 46% (2964) expected to be driving a vehicle that complies with the minimum emission standards for the proposed zone;
- 4% (261) expected to be driving a vehicle that would qualify for an exemption; and
- 50% (3269) did not expect to be driving a compliant or exempt vehicle.

It should be noted that it is possible some respondents answered this question thinking about the vehicle they currently drive as opposed to the vehicle they would expect to drive in two years' time.

4.4.2 Proposed Concessions

Question 5 asked: '*Thinking ahead to the proposed introduction of the Clean Air Zone in two years' time, are any of the following proposed local concessions likely to apply to you or your vehicle? If you don't drive, tick 'none apply'.*' See Appendix B for the full list presented in the questionnaire.

As with data received in response to Question 4, the Question 5 dataset has been cleaned to ensure drivers were only counted once and responses to Question 15 (driver status) were considered.

460 respondents to Question 5 anticipated to qualify for at least 1 concession. It is noted that this includes respondents that stated in Question 4 that they anticipate either meeting the minimum emission standards or qualifying for one of the proposed exemptions.

4.4.3 Identifying respondent drivers that would not be charged

Using information provided by respondents to Questions 4 (is your vehicle exempt?), 5 (are you eligible for any concessions?) and 15 (do you drive?) it was possible to estimate how many would not be charged in two years' time. This process included the removal of anomalous data and use of professional judgement to attain a dataset that could be reasonably analysed (see Appendix C for details). Data from the remaining 6074 respondents was included in the dataset.

Of these 6074 respondents:

- 56% (3408) selected options that suggested they would not be charged; and
- 44% (2666) selected options indicating that either they did not drive or did not expect to meet minimum emission standards or qualify for any of the proposed exemptions or concessions.

This type of consultation typically attracts responses from those that would be impacted by the proposals, i.e. likely to be charged. This may help to explain why the numbers above differ from those attained when a neutral data sample was used, for example, as part of the Stated Preference Survey.

The numbers above suggest that the Scheme proposals generated interest from a wide range of people, including:

- Those likely to be charged, possibly as they currently own a non-compliant vehicle;
- Those that were concerned about the impact on them;
- Those that would not be directly impacted by the proposed charges and were concerned about the impact on others; and
- Supporters of the need for improved air quality in Bath.

This is supported by the responses summarised in the later Chapters of this report. These Chapters include a range of specific comments surrounding the details of the proposed Scheme and perceived secondary impacts.

4.5 Detailed Feedback

The detailed feedback provided by respondents to the questionnaire for individuals and groups is presented in the Chapters 7 to 15 on a topic by topic basis. Where appropriate, data from the datasets set out above has been used to cross reference the responses given. For example, to determine whether opinions differ based on where respondents live, or how they travel.

5. Overview of Respondents to the Questionnaire for Businesses

5.1 Overview

This Chapter provides a profile of the respondents who completed the Questionnaire for Businesses. It reports on the closed text questions relating to business respondent characteristics, vehicle fleets and travel behaviour. It should be read in conjunction with Appendix C which provides further detail on how the dataset was cleaned and analysed and contains full data reporting.

Detailed choices and comments made on key topics are presented in Chapters 7 to 15. These Chapters include a summary of the responses to the open text questions, alongside any related closed text questions.

A copy of the Questionnaire for Businesses is included in Appendix B. It contained the following questions:

- **Question 1** asked whether respondents had any suggestions on changes to the proposed CAZ boundary.
- **Questions 2 and 3** asked whether respondents felt that the proposed CAZ charges would be effective in encouraging behaviour change and whether there are any alternative charges that the respondent felt would be more effective in helping to meet air quality targets.
- **Questions 4 and 5** asked whether their business currently uses any vehicles that would pass through the proposed zone and how many vehicles of different vehicle classes they owned. **Question 6** followed this up asking how many of the vehicles operated by the businesses would be compliant or qualify for concessions and therefore, would not be charged under current CAZ plans. **Question 7** was an opportunity to provide further information that businesses would like the Council to know about their fleet.
- **Question 8** asked whether any proposed concessions would apply to vehicles used by the business.
- **Question 9** asked respondents to rank a list of proposed concessions in terms of importance to their business and **Question 10** asked whether respondents had any suggestions for further concessions.
- **Question 11** asked what respondents believed their business would do in response to the CAZ charge if they had uncompliant vehicles.
- **Questions 12 and 13** asked respondents to rank which proposed supporting measures would be a priority for their business.
- **Question 14** asked for suggestions of any other supporting measures that would help their business.
- **Question 15** asked respondents whether their business has or is planning to take any steps to tackle air pollution within Bath.
- **Question 16** asked whether respondents felt that their business would be impacted by the proposed CAZ.
- **Question 17** asked whether respondents had any further comments on the CAZ proposal, including any suggestions for alternatives.
- **Questions 18 to 24** asked for more information on the respondent's business, e.g. how many people they employ, where they are located, etc.

5.2 Survey size and response rate

The questionnaire for businesses received 567 responses, in summary:

- The majority of questions saw a response rate of over 50%.
- Question 2, which relates to the proposed charges, showed the highest response rate, with 97% of all business respondents answering the question.

- The least responded to question was Question 9, where business respondents were asked to rank their top three proposed concessions, with only 35% of business respondents answering this question.

5.3 Respondent type

5.3.1 Business Type

Question 18 asked “*Specify the type of business you are responding on behalf of*”. Of the 406 business respondents that answered this question:

- 51% of represented small businesses (27% were self-employed, 15% were independent retailers and 9% were SMEs)
- 5% were transport operators and freight or distribution companies;
- 4% were hotels/B&Bs or restaurant/bars; and
- 8% represented educational institutions or health organisations.

Over 30% of business respondents that answered this question specified that they represented a type of business not identified in the list. Examples of answers provided include charity and volunteer organisations, churches, Town and Parish Councils, small businesses, tradesmen, consultancy companies, taxi drivers, dance schools, driving schools, tradesmen and vehicle repair firms. Some respondents also identified themselves as residents (suggesting they completed the wrong questionnaire).

The full list of business respondents, as provided by Question 19 which asked, ‘*What is the name of your business or organisation?*’, can be found in Appendix C. Responses included those from:

- Charities;
- Churches’;
- Schools and Colleges;
- Builders / carpenters / decorators / gardeners;
- Taxi firms; and
- Local businesses.

Question 20 asked ‘*Are you authorised to respond on behalf of this business or organisation?*’. 382 business respondents identified themselves as being authorised to respond on behalf of their business or organisation. 185 skipped this question.

5.3.2 Business Location

Question 22 asked ‘*Where is your business or organisation located?*’. Of the 384 business respondents that answered this question:

- 34% indicated they are located in the proposed zone;
- 37% reported as being located in Bath but outside of the proposed zone; and
- 15% in B&NES but not in Bath and 7% outside of B&NES.

Using data from Question 23, which asked for the first four digits of the business’ postcode, maps of the location of business respondents have been produced. Figure 5-1 shows a detailed breakdown of the business location of respondents in Bath, whilst Appendix C shows business respondents over a wider area.

- The majority of business respondents (43) are located within the city centre; and
- Businesses also responded from Victoria Park (26), Lansdown (20), Twerton (19), Odd Down (18), Newbridge (17), and Camden (17).

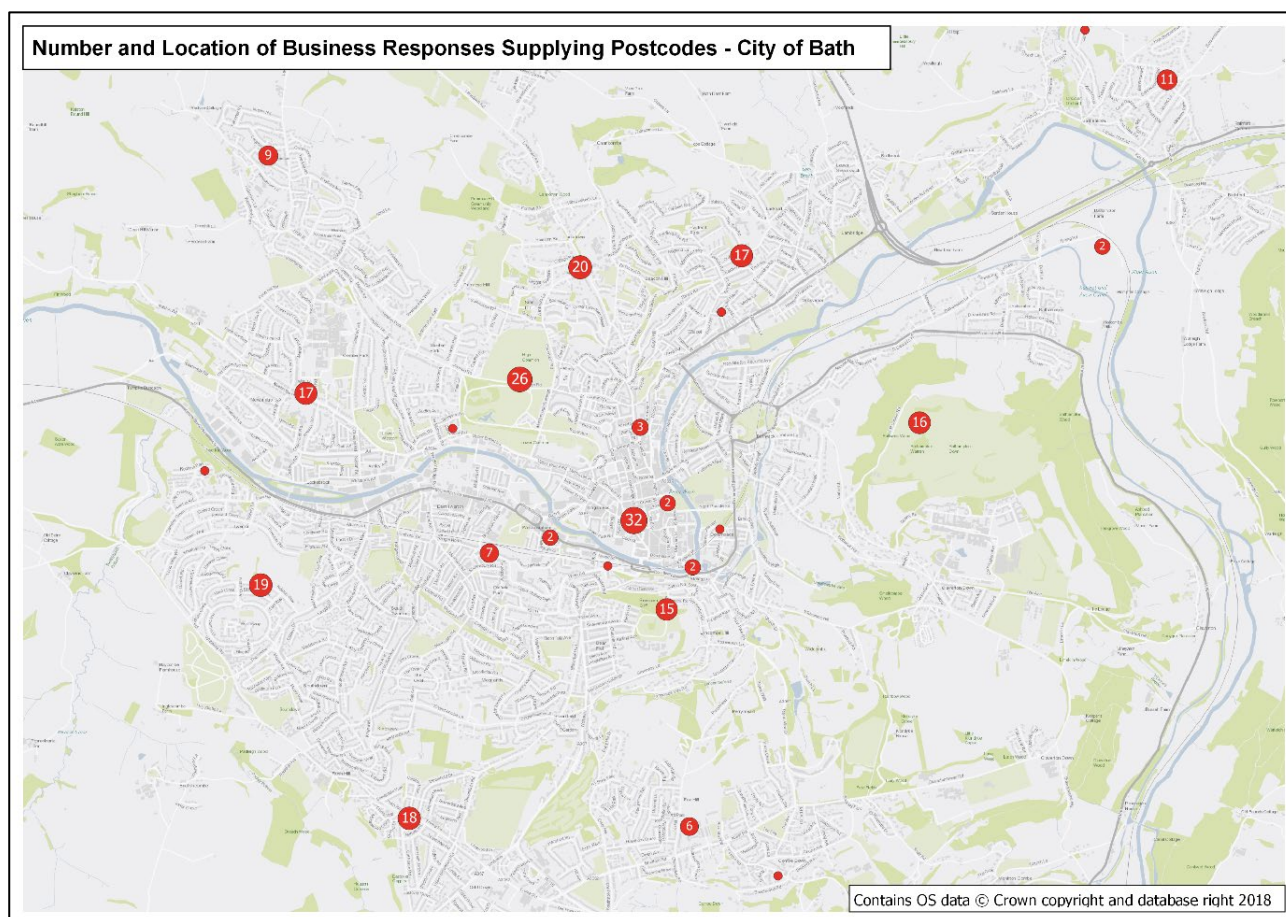


Figure 5-1: Number and Location of Business Responses Supplying Postcodes – City of Bath

5.3.3 Business Employees

Question 24 asked '*How many people does your business employ?*'

Cross tabulation with data provided in Question 18 (business type), indicated that a number of self-employed and market traders stated 0. These responses have been considered as one employee. Of the 364 business respondents that answered this question:

- The majority, 65%, indicated that they employed less than 7 staff. Of these, 81% stated that they employed less than 3 staff. This includes the self-employed and market traders; and
- 11% of business respondents indicated they employed over 30 staff.

Some respondents specified that they do not employ staff but use suppliers/deliveries/tradesmen. 6 respondents indicated that they received help from a number of volunteers.

5.3.4 Vehicle Operation

Question 4 asked '*Does your business or organisation own or operate vehicles that travel into or through the proposed zone in Bath?*' Of the 502 business respondents that answered this question:

- 72% answered yes.

Question 21 asked '*How often do your vehicles drive into or through the proposed zone in Bath?*'. Of the 397 business respondents that answered:

- 49% said they drove into the proposed zone daily; 32% said they drove into the proposed zone several times a week; and 16% reported that they drove into the zone once a week or less.

5.4 Fleet Data

This Section reports on the responses provided to Questions 5 (current vehicle fleet), 6 (vehicle fleet anticipated in two years) and 7 (further information about business fleet). Any commercially sensitive information has been

removed. Questions 5 and 6 were designed to help business respondents to understand if their vehicles would be charged in 2 years' time.

Question 5 asked '*How many vehicles do you own or operate and what type of vehicles are they?*'

376 business respondents provided information regarding at least one vehicle type. The data provided was quantified and business respondents that commented 0 were discounted. 372 business respondents remained in the dataset. Of the 372 respondents:

- 72% had at least one car (this includes respondents with more than one vehicle type). 50% of these business respondents indicated that they only had cars in their fleets; and
- 45% of business respondents had at least one LGV (this includes respondents with more than one vehicle type). 36% of these businesses' respondents indicated that they only had LGVs in their fleets.

Conclusions cannot be drawn from the number of respondents stating "0" as respondents that did not answer this question may have done so due to them not operating vehicles.

Further analysis of data, to determine the business respondents' fleet size, showed of the 372 respondents:

- 85% owned or operated a vehicle fleet of 5 or less;
- 8% owned or operated a vehicle fleet of between 6 and 10;
- 5% owned or operated a vehicle fleet of between 11 and 50; and
- 2% owned or operated a vehicle fleet greater than 50.

Question 6 asked '*Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, to the best of your knowledge, please indicate (or estimate) how many of the vehicles you told us about in Question 5 would fall into the categories listed above and therefore, would not be charged.*'

328 business respondents provided information regarding at least one vehicle type. The data provided was quantified. In contrast to Question 5, respondents stating 0 were included. Of the 320 businesses respondents remaining in the dataset:

- 63% expected to own at least one compliant vehicle in two years' time;
- 43% expected to own at least one compliant car; and
- 27% expected to own at least one compliant LGV in two years' time.

Further analysis of data provided in Questions 5 and 6 resulted in 318 responses that could be reasonably analysed, this is detailed in Appendix C. As shown in Figure 5-2:

- 55% of business respondents anticipated having over 50% of their fleet compliant, this was predominately fleets with 5 vehicles or less; and
- 36% of businesses respondents did not anticipate having any compliant vehicles, this was predominately fleets with 5 vehicles or less.

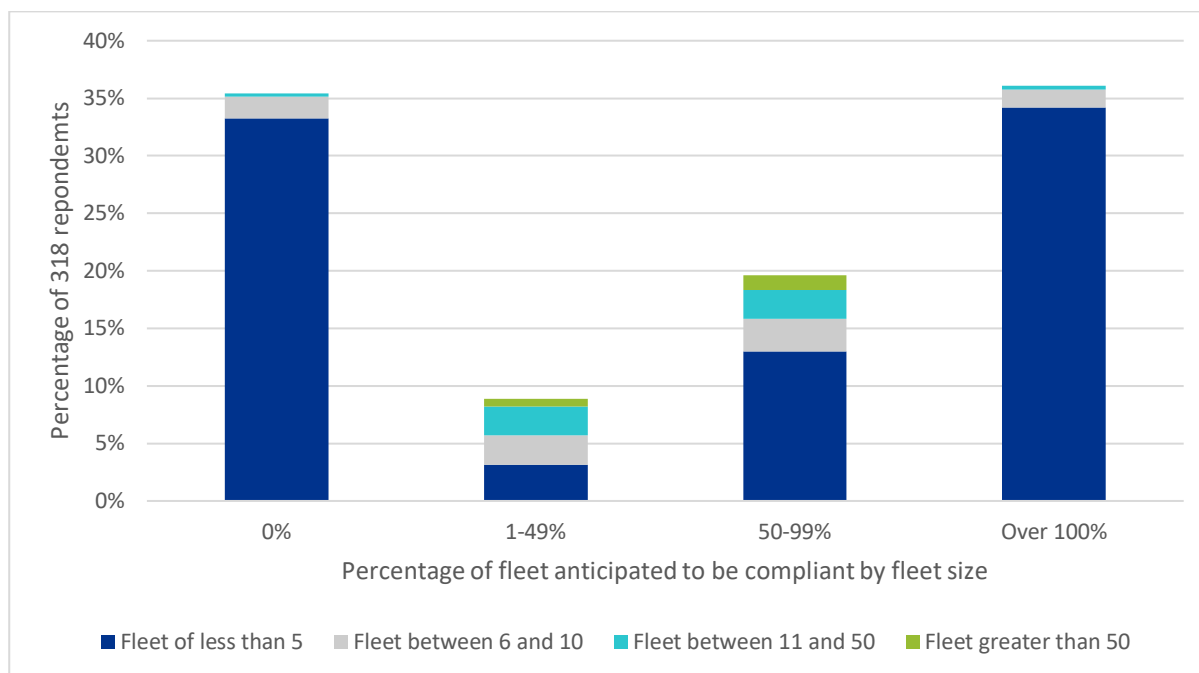


Figure 5-2: % of fleet compliant cross tabulated with number of vehicles in fleet

5.4.1 Comments on vehicle fleets

Question 7 asked business respondents “*Is there any other information you would like us to know about your vehicle or fleet of vehicles?*”.

Responses to this question highlighted that businesses require greater clarification about what vehicles would be compliant with the CAZ and the future intentions of the proposed Scheme. Some business respondents commented on the potential for them to change their vehicles and the influencing factors. Many business respondents expressed concerns about the financial and economic impacts associated with achieving compliance or continuing to operate in Bath using non-compliant vehicles.

Table 5-1 provides an overview of the comments received. Note there was also some misunderstanding among business respondents about which vehicles would be charged.

Table 5-1: Overview of comments from Question 7 of the Business Questionnaire

	Comments relating to business respondent vehicle/vehicle fleet
<i>Comments relating to vehicle compliance</i>	<ul style="list-style-type: none"> - Concern that LPG converted engines would not be recognised as compliant. - Further information should be provided on whether the criteria for compliance will change in the future. - Some business respondents felt that their existing vehicles were already environmentally friendly, despite the fact they would not be exempt from CAZ charges.

	Comments relating to business respondent vehicle/vehicle fleet
	<ul style="list-style-type: none"> - There was also concern for business vehicles such as takeaway vans that do very low mileage. - There was some confusion about why vehicle(s) not charged in London Low Emissions Zone (LEZ) would be charged by the CAZ. - Request for further information on what a trade licence plate is. - Some respondents disagreed with how vehicle tax classes work, and which ones are exempted from paying charges. - There was uncertainty surrounding the charging of agricultural vehicles. - Concern that diesel vehicles had been purchased following Government advice to use diesel engines. - A number of specific concerns relating to individual circumstances associated with business operations were also given.
<i>Comments relating to potentially changing vehicle/fleet</i>	<p>Positive</p> <ul style="list-style-type: none"> - Some respondents commented that they will or were considering purchasing compliant vehicle(s). - Some business respondents showed support for the Scheme and noted that it will bring forward their purchase of electric vehicles. - Some respondents commented that they already operate Ultra Low Emissions Vehicles (ULEVs) and showed support for them being used by more businesses in the future. - It was noted that some businesses would be happy to use electric vehicles, but current technology/infrastructure/range was not considered adequate. <p>Negative</p> <ul style="list-style-type: none"> - There was some resistance to changing of their current non-compliant vehicle(s) because business respondents considered them to be road worthy/have miles left. - Concern surrounding typical vehicle life spans and the challenges associated with upgrading vehicles prematurely. - Concern about what to do with vehicles that are owned on a lease programme, not due to be renewed/end until after CAZ implementation. - Concern about switching to petrol equivalent compliant vehicles due to mileage requirements, petrol fuel being less economical and the life span of petrol vehicles in comparison to diesel. - Some business respondents felt that the carbon footprint associated with the scrappage of old vehicles, and manufacture of new vehicles, outweighed the air quality improvements associated with changing to lower emission vehicles.
<i>Comments relating to financial/economic impacts</i>	<ul style="list-style-type: none"> - Concern about the financial impacts of this Scheme to individual businesses, especially with other pressures including rent, pitch rates and business rates. - The expense of purchasing a lower emission vehicle was a common concern among respondents, especially among LGV drivers. Some provided information on how much money they had already invested, to illustrate the difficulty they were facing. - Some respondents expressed concern for employee owned vehicles. Concerns included: impact to the employees themselves (who might face financial difficulties) and the impact that might have on overall business operation, including staff choosing to work elsewhere. - Some respondents were concerned about passing the proposed CAZ charge costs on to customers/clients in case this resulted in a loss of business.
<i>Other Comments</i>	<ul style="list-style-type: none"> - Some business respondents mentioned that their vehicles were less polluting than buses. - It was noted by some business respondents that they had their vehicles serviced regularly or that they were low mileage. - Some business respondents felt that vehicles would be less polluting if there were less traffic lights and better traffic management in Bath.

5.5 Steps being taken by businesses to reduce air pollution

Question 15 asked business respondents “Please tell us about any steps that your business has already taken or is planning to make to reduce air pollution in Bath?”.

Many business respondents provided examples of how they already reduce their contribution to air pollution or how they are planning to change their behaviour in the future, these can be found in Table 5-2. This included comments on fleet composition and use of lower emission transport alternatives, as well as adjustments to business operations to account for vehicle emissions. Some business respondents commented that they were not taking any steps to address their contribution to air pollution in Bath and were not planning to. It was noted by some business respondents that there were some barriers facing them and their decisions to take steps to reduce their contribution to air pollution.

Table 5-2: Steps being taken by businesses to reduce air pollution in Bath

	Comments relating to steps taken by businesses to reduce air pollution
<i>Steps taken to reduce contribution to air pollution</i>	<ul style="list-style-type: none"> - Many business respondents stated that they plan their vehicle routes to: <ul style="list-style-type: none"> - Make the most efficient use of fuel; - Avoid unnecessary trips; - Minimise driving/reduce daily mileage; and - Use the most efficient vehicle for the planned journey/delivery. - It is noted that some business respondents plan to improve on this in the future. - Some business respondents, including tradesmen, highlighted how they use consolidation methods including car/van sharing with others or within the business. It is noted that this is limited when lots of equipment and tools are required. - Some business respondents noted that where possible, they look to travel outside the peak NO₂ times, specifically pre/post-rush hour and at weekends. - Some tradesmen commented that they use vehicles only when needed, to drop off and collect kit at beginning and end of a job, and then cycle/walk to site. - During business hours, it was noted by many business respondents, that they travel by foot or on public transport where possible. Some mentioned specific circumstances when this is not possible, for example if transportation of heavy items is involved or there is not a public transport route available that gets them to the required destination. - Some hotel/B&B business respondents noted that they encourage or ask guests to arrive by public transport, specifically train or bus. It was also noted that upon arrival they provide information to guests about the Park and Ride and other public transport that can be used throughout their stay in Bath. - Some business respondents commented that they encourage staff to walk, cycle or use public transport to travel to work. Some mentioned that their workforce already travels to work entirely by sustainable modes. - Business respondents provided details on how they already have compliant vehicles or plan to convert their fleet to compliant vehicles, with some mentioning use of ULEV and biomethane fuelled vehicles. It was also mentioned by some that they regularly upgrade their fleet. In some cases, business respondents provided information on the financial costs to them of doing this. - It was mentioned by some business respondents that they ensure staff have taken driver telemetry courses, to learn safe and efficient driving styles. Some added that they plan to increase these efforts in the future. - Some business respondents provide a free delivery service, to reduce the need for customers to travel into the city. - Some business respondents provide electric charging points for use by guests/staff. - It was mentioned by some business respondents that they only use their vehicles when public transport alternatives are not available. Specifically, early morning or later on in the evenings. - Source goods locally, to reduce miles travelled and overall impact to air quality. - Remote working was also mentioned by some business respondents as a way to reduce their impact on air pollution. - Plant trees and shrubs. - Offer families free high-vis jackets to encourage walking to nursery. - Provide a ride to work scheme with subsidised bike purchase.

	<ul style="list-style-type: none"> - Provide electric pool bikes for staff to use. - Some business respondents mentioned that they switch off engines when idling.
<i>Identified barriers to improving business respondents' contribution to air pollution</i>	<ul style="list-style-type: none"> - Concern about the affordability of electric vehicles. - A feeling that some walking and cycling routes are currently unsafe especially during rush hours and late night/early mornings. - Concerns about the affordability for staff or sub-contractors to change their vehicles. - It was felt that public transport was not sufficient for all business operating hours, specifically train improvements were mentioned. - Technological restrictions were identified as a barrier, including electric vehicle battery life and mileage range specifically for those business respondents travelling long distances daily. - The time available to change vehicle fleets to be compliant was a frequently mentioned concern for business respondents. It was felt that a longer time to change to compliant vehicles would help ease some of the burdens associated with becoming compliant, specifically financial burdens. - There were some suggestions on how these barriers could be overcome. These are reported in more detail in Chapters 11 and 13.
<i>Other comments</i>	<ul style="list-style-type: none"> - Businesses mentioned a wide range of other environmental efforts including recycling, park clean ups, reduced air travel, improvements to building stock, solar and air source heating systems. - Some business respondents mentioned that although they were taking steps to reduce their contribution to air pollution they were concerned about the impact of charges on the general public. - Concern about business rates. - Concern about current vehicle(s) when purchased – loss of investment. Purchased cleanest vehicle available at the time and are unable to afford replacement. - Concerned about financial impacts to business cost of replacing vehicle(s).

5.6 Detailed feedback

The detailed feedback provided by respondents to the Questionnaire Businesses and Organisations is presented in the Chapters 6 -15 on a topic by topic basis. Where appropriate data from the datasets set out above has been used to cross reference the responses given, for example to determine whether opinions differ based on where respondents live, or how often they travel.

6. Overarching Comments

6.1 Overview

This Chapter reports:

- General comments made across all questions in both the individuals and the business questionnaire where these were not specific to a particular issue or topic, but instead commented on the overall principle/approach of the Scheme proposals.
- Similarly, general comments made in letters and emails (although fuller details of comments submitted by letter are included in Chapter 15).

Overview of overarching comments

Although many respondents recognised the need to improve air quality in Bath and supported action to tackle these issues, as would be expected for a consultation of this nature, some of the feedback highlighted concerns about a charging scheme in principle. Much of the feedback detailed concerns about the details of the proposed Scheme.

Those who expressed their general support for the principle of a charging zone, or a Class D CAZ in particular, did so because they:

- Recognised that the Scheme could deliver improvements to their immediate area.
- Appreciated the wider benefits in terms of public health.
- Recognised air quality had been a problem for some time and needs to be addressed.
- Supported measures to tackle issues related to traffic volumes and congestion.
- Felt that the Scheme could help to improve the attractiveness of Bath as a place to live and as a destination for work and leisure.

Those who expressed concern about the proposed Scheme highlighted specific issues relating to the extent to which the impacts of the Scheme would outweigh the benefits, whether charging was the right approach and complex issues relating to affordability.

The feedback detailed in this Section is intended to give an overview of the range of comments received in relation to the Scheme proposals as a whole (as opposed to the detailed aspects of the Scheme which are covered in subsequent Chapters).

Comments were mixed and wide ranging, with some respondents and businesses detailing support for the Scheme and reasons for their support (Section 6.3.1) and others detailing concerns and reasons for those concerns (Section 6.3.2). This includes positive and negative comments about the Scheme overall and forecasted success alongside comments about air quality in Bath.

This Section is not intended to give an indication of overall support for or against the Scheme but to summarise those comments made and where appropriate give reasons. It should be noted that many of the comments included below are expanded upon in later Chapters. This Section should be read alongside the other Chapters in this report, which provide further detail of concerns and comments relating to different aspects of the Scheme proposals.

6.2 Support for a Clean Air Zone

In the context of the mandate from the Government, and recognising that a CAZ had been identified as the best practical way to meet the required air quality targets, the questionnaires did not specifically ask for statements of support for a CAZ and instead focused on drawing out feedback on the detail of the Scheme and how its impacts could be mitigated (and it is this detail which is reported in later Chapters).

However, many respondents expressed a general view in their open text responses about whether they thought a CAZ was the most appropriate solution. It should be noted that many respondents expressed general support for measures to tackle air quality and noted the public health, environmental and transport benefits of doing so.

Notably, a number of organisations expressed their support for a CAZ as the best way to address air quality. These included:

- Wiltshire Council

- Liberal Democrats B&NES
- Bath Preservation Trust
- Batheaston Parish Council
- Claverton Parish Council
- Combe Hay Parish Council
- Midsomer Norton Town Council
- Radstock Town Council
- Westbury Town Council
- Valley Parishes Alliance
- The Abbey Residents' Association
- Bear Flat Association
- Beech Avenue Residents Association
- Camden Residents Association
- The Cavendish Road Society
- Lower Oldfield Park Residents Association
- The Sydney Place Residents Association
- Upper Oldfield Park
- The Clean Air for Bathwick Campaign
- St John's Evangelist Roman Catholic Church
- UPS and smaller businesses

Furthermore, a range of organisations expressed their more specific support for a Class D CAZ, albeit that some commented on further amendments they might like to see. These included:

- South Gloucestershire Council
- Client Earth
- Bathwick Hill Residents' Association
- The Circus Area Residents Association
- Lansdown Crescent Association
- Pulteney Estates Residents Association
- Widcombe Association

6.3 General comments from Individuals and Groups

6.3.1 Comments in support of the Scheme proposals from Individuals and Groups

Table 6-1 details the comments made in support of the Scheme proposals. This includes reasons for support, how the Scheme could go further, concerns with Scheme details (made within the context of overall support) and comments specifically made by business respondents.

Table 6-1: Comments in Support of Scheme Proposals

	Comments in support of Scheme Proposals
<i>General</i>	<ul style="list-style-type: none"> - Some respondents thought the Council had taken a direct, forward thinking and ambitious approach to improving air quality and were supportive of this. Some respondents also considered the proposals long overdue. - Cleaner air was considered by many respondents to improve the quality of life of those living and working in Bath and the experience of those visiting the city. - Some respondents commented that they were supportive of the Scheme and believe that bold action is required to encourage behaviour change among the community – who rely heavily on car use. - There were some comments that highlighted that some respondents were happy to incur financial penalties now, in order to avoid the cost of potential health problems in later life. - Some respondents were supportive that the Council was taking steps to improve the lives of Bath's community now and for future generations. - Respondents commented that the more that pollution could be reduced the better. - Some respondents commented that they supported the Scheme but would not support any reduction in the proposed zone boundary. - Some respondents felt that more cities should follow Bath's example.
<i>Reasons for support</i>	<ul style="list-style-type: none"> - There were many comments that showed a general support for cleaner air, because respondents were encouraged that the positive impacts would be felt by everyone and especially the most vulnerable in society including: <ul style="list-style-type: none"> - Children. - The elderly. - Those with existing health concerns. - Many parents, asthma sufferers, cyclists, frequent walkers and environmentalists commented that personal circumstances or individual benefits were behind their strong support for the proposals. - Some respondents considered many of the vehicle trips made in Bath to be unnecessary and hoped the Scheme would encourage those drivers using their cars for short distances to walk and cycle more. - Respondents commented that they thought business in Bath would flourish as a result of proposals. Reasons given included: <ul style="list-style-type: none"> - Cleaner air would increase the attractiveness of Bath as a destination. - There could be cost savings through increased productivity of employees, improved health of employees and reduced fuel consumption. - Some comments suggested that the CAZ was a good first step in encouraging Bath residents to move to entirely emission free vehicles in the future. - Some respondents highlighted the importance of protecting Bath's cultural heritage. It was felt that because Bath is a UNESCO City, the Council should do all that was possible to improve the local environment to preserve history and ensure Bath remains an attractive place to live, work and visit.

	Comments in support of Scheme Proposals
	<ul style="list-style-type: none"> - Some respondents made particular mention of a charging Scheme. It was felt that drivers should pay for the negative impacts of their polluting vehicles on others and other comments considered charging drivers to be the only way to change behaviour. - Some respondents supported the Scheme because of the potential to reduce traffic on the roads, specifically the number of polluting larger vehicles using some roads in Bath and surrounding areas. - There was strong support for increased uptake of walking and cycling in Bath, which many respondents hoped would be facilitated as part of the Scheme. - Some respondents hoped that the Scheme would improve the environment for pedestrians and cyclists. Specifically, that reduced traffic on roads would improve safety.
<i>Concerns about implementation</i>	<ul style="list-style-type: none"> - Some respondents recognised that proposals might be unpopular in the short term but felt that the Council should proceed with proposals so that the long-term health benefits for the community could be realised. - There was concern among some respondents that proposals would be de-railed by lobbying and protest groups. - Some respondents supportive of the Scheme expressed concern that more vocal opponents to the Scheme would be listened to. Further to this, some considered that this opposition would unlikely be representative of the wider population of Bath's general opinion. - There was concern that implementation of the proposals would result in opposition and resistance. Many respondents urged the Council to resist this opposition in order for the health benefits of improved air quality to be realised by the community. - Some respondents commented that they had confidence the Scheme would work because they considered the London LEZ (Low Emissions Zone) to have been a success. - Some respondents, despite their support for the proposals, had concerns about Scheme details including boundary placement and impacts on specific groups. These are addressed in greater detail in later Chapters.
<i>Proposals could go further/ be improved</i>	<ul style="list-style-type: none"> - Some respondents suggested proposals could be further improved by expanding the proposed zone boundary and increasing the proposed charging levels. - Some respondents showed concern that they would not realise the benefits of the Scheme because they lived outside of the zone boundary. - Many respondents commented that they would like implementation of a CAZ to begin as soon as possible. - Some respondents suggested that the zone had a trial period before any future changes or adjustments are made and was kept under regular review. - There were comments suggesting that more should be done to educate drivers about the negative impacts imposed on others as a result of driving polluting vehicles. It was suggested the proposals could go further in efforts to encourage drivers to take responsibility for these impacts, especially in relation to health and safety. - There were suggestions that the positive health benefits of the Scheme could be more widely/better communicated.
<i>Comments from Business respondents</i>	<ul style="list-style-type: none"> - Bath relies on tourism, hospitality and retail. These industries are reliant on Bath being an attractive place for customers and tourists to visit. It was felt that less pollution and congestion in the city as a result of a CAZ would increase the attractiveness of Bath. - Some businesses supported the Scheme in general but had some concerns it may result in short-term issues including administrative burden and a lack of

	Comments in support of Scheme Proposals
	<p>understanding of the need for change. It was suggested an education and communications plan would help to tackle this.</p> <ul style="list-style-type: none"> - Some businesses showed strong support for the Scheme, commenting that it was long overdue. - Some business respondents suggested the CAZ would successfully achieve air quality improvements. Specifically, it was noted that the London Zone made a real difference with benefits seen outside of the zone boundary there too.

6.3.2 General Concerns about Scheme proposals from individuals and groups

Across the questionnaire, and in letters and emails, some respondents set out general concerns about the Scheme, including the principle of the proposal. The comments in Table 6-2 detail these concerns. Broadly they fall into two themes:

- Respondents that did not consider any Scheme was needed to improve air quality in Bath (and that it would improve naturally over time), or that any form of CAZ was an appropriate course of action; and
- Respondents that recognised the need to improve air quality but had fundamental concerns about the approach outlined in the Scheme proposals.

Respondents to the individuals and groups Questionnaire provided reasons for their lack of support for the proposed Scheme, had doubts about the effectiveness of the proposed Scheme to improve air quality, and detailed concerns about elements of the Scheme design and implementation.

Those business respondents that were not supportive of the Scheme showed concern for the impact on Bath's economy, tourist and visitor population. They also had concerns about their business operations, including staff and customer retention and financial viability.

Table 6-2: Concerns about Scheme proposals

	Concerns about Scheme Proposals
<i>General</i>	<ul style="list-style-type: none"> - Some respondents did not support any Scheme to tackle air quality. - Some respondents considered the CAZ to be a money-making Scheme for the Council and showed disbelief that there would be any impact on health. - Some respondents suggested the negative impacts of the Scheme were not worth the anticipated level of improvement in air quality. - It was felt by some respondents that vehicle manufacturers not consumers should be targeted by the Scheme. - Some respondents did not agree that Bath has an air quality problem. - Some respondents were concerned about the capability and motivations of the Council.
<i>Reasons for lack of support</i>	<ul style="list-style-type: none"> - Concern about impacts to residents and people who work in and visit Bath. Specifically, there was concern about increased costs of living, especially if businesses including transport operators and delivery firms pass on costs to customers and consumers. - There was concern that proposals would have negative impacts on tourism and the local economy. Some respondents felt that Bath would become a 'ghost' town or 'museum'. - Many respondents highlighted concerns about the impacts of the proposed Scheme on particular groups including:

	<ul style="list-style-type: none"> - Businesses in Bath, especially small businesses including independent retailers - Lower income households - Middle income households and those that are only just getting by - All residents - Elderly residents, who could become trapped - Some respondents raised concerns about the environmental implications of scrapping and buying new vehicles. Some respondents also did not want to scrap vehicles that they considered to be working well and regularly serviced. - There was concern that the 'wider' impacts of the Scheme had not been properly considered, including impacts on residential areas, towns and villages outside of the proposed zone. - Concern that Bath is too small for the Scheme. - Concern that the Scheme proposals are too focussed on the short term. - There was concern among some respondents that the Scheme would lead to geographical isolation for some communities and residents. Many commented that the Scheme would trap people both inside and outside of the zone and prevent access to services, visiting relatives, commuting trips and leisure trips. - There were concerns about the differential impacts of the Scheme, where some groups were considered to be disproportionately impacted in comparison to others. Specifically, that the Scheme would create a rich/poor divide and particularly impact those businesses and residents that were only just making ends meet. - Concern that bus ticket prices will increase as a result of the proposed Scheme.
<i>Doubts about Scheme success</i>	<ul style="list-style-type: none"> - Some respondents felt that because air quality would improve naturally anyway, the Scheme would generate unnecessary impacts for residents and businesses in Bath that could be avoided. - There was concern from some respondents that the Scheme would be redundant because the UK is leaving the EU. - Many respondents showed concern about the practicality of using other forms of transport. Specifically, that public transport services in Bath are inadequate and already at capacity. It was felt that increased demands generated as a result of the proposed Scheme would not be met, both in terms of service improvements and provision of additional capacity. It was also felt that lower emission vehicles were not viable for many residents and businesses. - Some respondents did not think the Scheme would have an impact on air quality, specifically because it does not limit the number of vehicles in the city and it was considered that the 'dirty' air from elsewhere in B&NES would blow back into the city centre.
<i>Scheme design and implementation</i>	<ul style="list-style-type: none"> - Many respondents expressed concern that the Scheme would change and become more stringent in the future. - Some respondents mentioned Schemes planned in other cities and questioned why Bath was charging cars when other cities had not. - Some respondents suggested that B&NES should take a more holistic approach to air quality and transport in the city. Respondents recommended that the Council tackle issues including parking, infrastructure, housing, public transport and cycle and walking infrastructure alongside and in parallel to air quality. It was suggested that there was better communication between council departments. - A common concern among respondents was the lack of 'carrots' offered as part of Scheme proposals. It was suggested that there was insufficient emphasis in the proposals concerning how the Council will help to support behaviour change. - There was some concern among respondents that the proposed charge level had been based on the stated preference survey. Some considered the sample size

	<p>used in this survey to be too small and not representative of the overall populations' opinion in Bath.</p> <ul style="list-style-type: none"> - Many respondents showed concern that a CAZ would push air pollution and traffic problems elsewhere. Concerns included increased parking in residential areas outside of the zone, rat running and worsening pollution in areas currently without pollution problems. - Some respondents questioned how vehicles are classified as compliant because engine size is not taken into account. Many felt that these classifications did not provide an accurate assessment of vehicle emissions. - Some respondents were concerned that the plans were not tackling the city's congestion problems. It was suggested that traffic management should be a higher priority and that once this was improved there would be a natural improvement in air quality.
<i>Comments from Business respondents</i>	<ul style="list-style-type: none"> - Some business respondents did not agree with the proposals and felt that the Scheme should not go ahead. - There was concern the Scheme would discourage visitors and turn the city into a 'museum'. - It was suggested by some business respondents that the Council should be more visionary in their approach to improving air quality in the Bath. With some respondents commenting that the proposals felt one dimensional. - There was concern that the Scheme was designed to make money for the Council. - Some business respondents showed concern that a CAZ would not work in Bath. Reasons given included: <ul style="list-style-type: none"> - A concern that Bath was too small for a CAZ to be effective. - It was felt that London still has traffic problems despite the LEZ. - Many respondents commented that alternative transport options are insufficient to encourage behaviour change. Specifically, it was noted that public transport is unreliable and expensive. - Many respondents had concerns that the CAZ would result in geographical and financial isolation for some groups. These concerns are explored more widely in the following Chapters. - There was some concern that the Scheme would contribute to/exacerbate global warming because of the higher fuel consumption associated with petrol vehicles and the emissions associated with scrappage and manufacture of vehicles. - Some business respondents showed concern about the overall impact to Bath's economy.

7. Comments About the CAZ Boundary

7.1 Overview

This Chapter reports:

- Comments made within Question 1 of the individuals and business questionnaires, which asked '*Are there any changes to the boundary of the proposed zone that you think we should consider?*'. Note that in both questionnaires the question on boundary was free text only, therefore there is no quantitative data for this topic;
- Comments made within the responses to other questions but that were identified as being specifically related to the proposed boundary; and
- Comments on the boundary sent in via letter or email both from individuals and businesses (although fuller details of comments submitted by letter are included in Chapter 15)

Within this Chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

This Chapter first reports the feedback from individuals and groups (Section 7.3), and then sets out the comments made by businesses (Section 7.4). In both Sections comments generally cover the following themes:

- General comments on the CAZ boundary and its implications on certain areas currently included or not included;
- Requests for additional areas to be included in the CAZ;
- Requests for specific areas to be removed from the proposed CAZ;
- Suggestions for alternative ways that the CAZ boundary could be defined; and
- Implications of the boundary position on certain journeys.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath, are reported in the individuals and groups section of this Chapter.

Overview of comments on the proposed CAZ boundary

Comments relating to the proposed CAZ boundary were extremely varied and highlight the importance of ensuring that the boundary is correctly defined. The feedback shows that there are a range of views. Whilst there was some feedback around very different ways of defining a boundary, the majority of feedback focussed on identifying potential amendments to the published proposed boundary. In summary these comments reflected:

- **Opinions that the zone should be smaller. The majority of respondents who expressed this view did so because of a desire to see through trips permitted and to ensure that every day essential journeys would not be impacted by a potential charge.**
- **Views that the zone should be larger. Whilst some respondents called for a larger zone because they felt that tackling current air quality issues in their area required bolder action, the majority of requests for a larger zone were made in response to concerns about the potential knock on effects of the CAZ.**

- Views that the zone should be designed in a way to enable specific journeys not to be charged, in particular journeys across the city, to the motorway and to key facilities, such as the hospital.
- Requests for minor adjustments to the boundaries to enable residents a route out of the city without clipping the edge of the zone.

7.2 Context for consideration of the comments made

The proposed CAZ boundary was defined based on the following rationale:

- The zone should be as small as possible to enable compliance with air quality targets and avoid impacting more people than is necessary.
- The boundary needs to be defined in a way that, as far as possible, avoids the potential impacts of rat running, allows safe opportunities for vehicles to turn around before they enter the CAZ, and minimises the impact of street clutter in the form of signage and cameras.

These principles would still need to be applied to any potential changes to the proposed boundary. It is also important to note that:

- If streets are considered for addition into the zone as a result of consultation feedback, it should be noted that residents in these areas may not have voiced their opinion during the consultation because they would not have been aware of a potential impact on them.
- If streets are considered for exclusion from the zone, it should be noted that residents in these areas may not have commented on the need for their area to be in the zone because they would have assumed that this was given.

7.3 Comments from individuals and groups

7.3.1 General comments on the proposed CAZ boundary from individuals/groups

The feedback included a range of general views on the size of the proposed CAZ. Some felt the zone was too large and should be made smaller, some felt that it was too small and should be enlarged. In some cases, respondents elaborated on this view, by specifying changes they would like to see, and these comments are reported separately in the Sections below. In other cases, a comment about the size of the zone was made in very general terms, and these are reflected here.

Those that stated that they were **generally happy with the proposed boundary** or that they broadly supported the proposals said:

- They were happy to see their street/local area/school included.
- Welcomed the zone because they felt it would make Bath a cleaner city, improve air quality and reduce traffic.
- Felt the boundaries looked logical and appreciated that they had been subject to detailed analysis.
- They were happy with changes that had been made since the original boundary (at SOC stage), to reflect comments about rat running etc.
- Did not wish to see the zone made any smaller.
- Felt that the boundaries should be monitored and reviewed.
- Could nevertheless, see that there would be some impacts, which would need to be carefully managed.

Those that commented (in general terms) that they **did not support the overall proposal for a CAZ or the boundary** identified (but where they did not make specific suggestions for amendments) typically expressed concern that:

- The CAZ should not go ahead at all or it is not the right way to address the issues.
- The proposed zone would penalise residents and not allow through traffic.
- The Scheme (generally and in relation to specific elements of the boundary) is designed to raise money for the Council.
- A CAZ would not work and is not appropriate for Bath.
- The overall proposal is short-sighted and not well thought out.

7.3.2 General comments on the size of the proposed CAZ boundary from individuals/groups

Those that expressed a general opinion that **the proposed CAZ is too big or should be made smaller** did so in range of different ways:

- The zone should include just the City Centre. Respondents defined the area they felt it should cover in different ways. For example, by saying it should cover just the City Centre (i.e. commercial/tourist zone), not include the residential areas, or should be more focused on the heart of the City, not extend to the south of the river and not extend out to the A36 or A4. The zone should cover the City Centre as it is defined in the Local Plan. Several **Parish and Town Councils** supported a smaller CAZ concentrated on the City Centre.
- The zone should allow people to travel around the outskirts of the city, from one side of the city to the other, to get out of the city, give residents more free movement and to get to important destinations such as supermarkets and petrol stations. It should therefore exclude the main routes, including the A36 and the A4.
- The zone should focus on particular locations only. The A4/London Road/Cleveland Bridge, the A36, Milsom Street, Queen Square, Gay Street, Southgate and George Street were specifically mentioned.
- There was concern that the size of the proposed zone was driven by a desire to generate revenue.
- There was concern that a zone of the size proposed would generate knock on impacts, in particular in relation to rat running.
- The zone proposed was perceived to be much wider to the west than to the east.
- There was some suggestion that the area in which cars are charged should be smaller (i.e. have a small inner Class D CAZ and a larger outer Class C CAZ).
- Respondents commented that the current boundary should not be described as central Bath.

Those that expressed the general view that **the proposed CAZ is too small or should be made larger** suggested that:

- The zone should cover a larger area generally. A wider zone was seen to mean that more people, particularly those in residential areas, would benefit from cleaner air. **Client Earth** commented that a large boundary would increase the likelihood of compliance.
- The zone should cover more of the areas where pollution is known to be a problem (e.g. London Road).
- The whole of the city should be included, the plans should be bolder, and the zone should include the whole of the World Heritage Site (WHS) (as suggested by **Bath Preservation Trust**), go out as far as the city boundary and should start at the Park and Ride sites to encourage their use.
- A larger zone would be a positive improvement. Some suggested that the charges should be lower, but the area wider.

- The zone should include all the approach roads and roads where people typically park/drop off, making the zone larger could prevent these issues being pushed to any area slightly further out of town.
- The zone should be larger to discourage people from driving around it/avoiding it/rat-running or parking on the outskirts. Respondents were sceptical that adjacent areas would not see an increase in traffic and felt that a larger zone would help to minimise these impacts. This view was echoed by many of the resident's associations.
- The zone should include all the schools, as a way of tackling school traffic, and to improve air quality around schools.
- Some felt that the zone should either cover specific hotspots in the centre or the whole city and expressed the view that a middle ground was not appropriate.
- Given the uncertainty in the air quality modelling some respondents expressed the view that the zone should be made larger to increase the likelihood of achieving compliance with the legal limits.
- The zone should cover a larger area to decrease the number of entry/exit points and charge all vehicles entering and exiting Bath but not residents moving within the zone.
- The zone was perceived to be much more extensive to the west of Bath and some respondents felt that it should be extended to the east.

Other respondents expressed concerns about the **consequences of the CAZ**. These issues are reported in more detail in other Sections, but in brief there was concern that:

- The CAZ would encourage rat running outside the zone, in particular across the toll bridge and through Bathwick, Combe Down, Odd Down, Oldfield Park and Weston. Concern that these routes are inappropriate for more traffic and that this will lead, overall, to additional mileage. Some commented that these issues made the proposal unworkable. The Green Party and the Liberal Democrats both highlighted rat running as a particular concern.
- The CAZ would lead to increased traffic on routes further out, affecting outlying towns and villages, including across Wiltshire. This view was expressed by Wiltshire Council and several of the Wiltshire Town and Parish Councils.
- The CAZ would increase pressure for parking on residential roads outside the zone.
- Areas currently outside the zone would see worsening air quality due to the above.
- Concern that streets on the edge of the zone would be used for turning for those wanting to avoid entering the zone.

7.3.3 Requests for inclusion of specific additional streets within the CAZ from individuals/groups

Table 7-1 lists the roads/areas that respondents would like to see **INCLUDED** in the CAZ or roads/areas where respondents expressed concern about not being currently included in the CAZ but did not specifically request their inclusion. Please note therefore that not all comments reported here were outright requests for inclusion. These comments are reported together to highlight the range of issues that were reported in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. In certain locations some respondents expressed concern that their area was not included within the CAZ/requested for the CAZ to be made larger, whilst other groups felt that the better solution was for those areas to be removed from the CAZ/for the zone to be made smaller. The opposing views are set out in the next Section.

Table 7-1: Requests for inclusion of streets/areas in the CAZ

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<p><i>A4 London Road/Larkhall</i></p>	<ul style="list-style-type: none"> - More of London Road should be included, as this is one of the most polluted routes and traffic is often at a standstill. This view was expressed by individuals, as well as by <u>Transition Larkhall</u> and by <u>South West Transport Network</u> and <u>Bus Users UK</u>. - Various suggestions were made for where the zone should start, including at the junctions for Brunswick Street, Morrison's, Kensington Place, Upper Hayes East, St. Saviours Road, Claremont Road, Grosvenor Place, Gloucester Road, Alice Park, Batheaston Bypass/A46 Roundabout, Toll Bridge Road or Bailbrook Lane. Some felt the full length of London Road West into Batheaston should be included. - Respondents recognised that including London Road in the proposed zone was important. Some were surprised and concerned not to see more of London Road included. There was confusion why more of London Road was not included, given that: <ul style="list-style-type: none"> - Other less polluted streets are included. - This is a densely populated area, with schools etc. - Including more of London Road would help it to become more pleasant for people walking and cycling. - Unless more of London Road is included, traffic volumes are unlikely to decrease. - If London Road is not included people will rat run over the toll bridge and through Lansdown, Camden, Larkhall and Fairfield Park. - Streets off London Road should be included e.g. Brunswick Street, Upper Lambridge Street and Kensington Place. - Concern that if additional areas are not included Larkhall/Camden will see significant pressure for parking. - Larger areas of Walcot, Camden and Larkhall should be included. Or these areas should become access only. - Charlcombe Lane should be included to protect the roads, frogs, toads and newts. If it remains outside the boundary it will become more of a rat run.
<p><i>Pulteney Estate Residential area:</i></p> <ul style="list-style-type: none"> - <i>A36 Bathwick Street</i> - <i>A36 Darlington Street</i> - <i>Great Pulteney Street</i> - <i>Laura Place</i> - <i>Henrietta Road</i> - <i>Henrietta Gardens</i> - <i>Henrietta Mews</i> - <i>Grove Street</i> - <i>Sutton Street</i> - <i>Daniel Street</i> - <i>Daniel Mews</i> 	<ul style="list-style-type: none"> - Respondents queried why this area had not initially been included in the proposed CAZ and felt that the zone should be extended to include the Pulteney Estate extending from Laura Place to Sydney Gardens, including Sydney Place, Darlington Street and the Bathwick roundabout. - Some mentioned the A36 only in this area, others called specifically for the inclusion of both the A36 and the residential area around Great Pulteney Street and Henrietta Road. - <u>Pulteney Estates Residents Association (PERA)</u> requested for the PERA area, extending from Laura Place to the top of Sydney Gardens and including Beckford Road, Sydney Road, Sydney Place, Darlington Street and Bathwick Roundabout and the area in between to be included in the zone. However, it should be noted that several individual respondents specifically stated that they did not agree with the residents' associations proposal to extend the CAZ to cover this area. Others suggested they would support the inclusion of this area if there were concessions for residents.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - Vane Street - St Johns Road - Edward Street - William Street - Pulteney Mews - Argyle Street - Johnstone Street 	<ul style="list-style-type: none"> - This area is predominantly residential but subject to significant stationary and slow-moving traffic and pollution is already too high. - Parking in this area is already difficult. The CAZ would create additional pressure for parking, rat running and increased use as a dropping off point (as it will be the closest area to the centre that it is not in the zone). There was concern that air pollution in this area will increase if a CAZ is implemented. If this area is excluded from the CAZ, parking will need to be strictly controlled. It was noted that access for emergency service vehicles is already difficult, because of parked cars. - Leaving this area out of the CAZ allows/encourages coaches to continue to use this area. There is particularly concern about coaches dropping off passengers at Laura Place. - Leaving this area out of the CAZ does not discourage vehicles coming in from Bathwick Hill or the Warminster Road. - Leaving this area out will increase rat running and queuing traffic/idling engines. Rat running is already a concern, for example on St. John's Road, Daniel Street and Henrietta Road as drivers try to avoid the A36. - Concern that this area is not included in the CAZ to enable parking at the rugby ground. - Leaving out this area will increase traffic on Great Pulteney Street, where noise and vibration from road traffic is already an issue. It would be the street allowing the closest access to the city centre whilst being outside the CAZ. - There are a number of significant/listed/locally important buildings/landmarks in this area which should be protected. - Excluding this area seems illogical. - Henrietta Park should benefit from cleaner air. - Respondents noted that residents in this area with asthmas and associated conditions are affected by air quality. If this area is not included it will become a rat-run and will be used by vehicles skirting around the eastern side of the city through Bathwick and Bathwick Hill. - The Rugby ground should be within the zone. There was some scepticism around the reasons why this may have been excluded. - Including these areas would create a better environment for walking and cycling. - Some respondents recognised that Bathwick Street forms an important part of the A36 through route and asked therefore for it not to be included. - Bath Preservation Trust queried why this area and the wider Bathwick area are not included in the zone and noted the need to protect the heritage as well as the people in this area. - FoBRA also suggested the boundary be extended to include Great Pulteney Street. - (Note that there is some overlap – many respondents also called for the gyratory and wider Bathwick area to be included and mentioned this area as a whole).
<p>Sydney Road/Sydney Place/Beckford Road gyratory</p>	<ul style="list-style-type: none"> - Sydney Place Residents Association specifically requested to be included within the zone and expressed concern that air quality levels have not been accurately monitored or modelled in this area.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Pulteney Estates Residents Association (PERA) also requested for this area to be included, in addition to the residential areas. FoBRA specifically requested that Sydney Gardens and Sydney Place be include in the zone. - Responses highlight that in this area there are high numbers of elderly people and sensitive historic buildings. - Concern that this area will become a rat run, a turning point and a drop off area.
<p><i>Wider Bathwick area including:</i></p> <ul style="list-style-type: none"> - Bathwick Estate - Bathwick Hill (including routes off) - Cleveland Walk - North Road - A36 Warminster Road - A36 Beckford Road - Sydney Gardens - Pulteney Road - Beckford Gardens - Rockcliffe Road - Rockcliffe Avenue - Forester Road - Forester Avenue - Sydney Mews - Raby Mews 	<ul style="list-style-type: none"> - The Bathwick area is a high density residential area. Air quality in these areas is currently poor and residents in this area also experience noise pollution. The Bathwick Estate should therefore be included in the zone. - Clean Air for Bathwick submitted a petition with 45 signatures requesting for the wider Bathwick area to be included in the zone. - Friends of Sydney Gardens have requested the inclusion of Sydney Gardens and the surrounding roads. - Bathwick Hill Residents Association stated that they supported an extension of the zone to include the Bathwick gyratory and the bottom on North Road. - Widcombe Association stated that an extension of the zone into the Bathwick estate would help address potential rat runs and support the inclusion of Great Pulteney Street. - FoBRA requested that the bottom of North Road be included in the zone. - The boundary on the A36 Warminster Road should extend to St Christopher's Close or Down Lane. This would reduce rat running on Mill Lane and across the toll bridge. - Traffic volumes including HGVs, on these routes are already very high, particularly on Warminster Road, Beckford Road, North Road and Bathwick Hill The CAZ should be enlarged to include these areas to stop this increasing. - The current boundary will push additional traffic onto these routes and including this area would prevent traffic trying to skirt around the east of Bath and avoid creating rat runs. Particular concerns about the Cleveland Walk area, North Road, Warminster Road, Bathwick Hill and Sydney Buildings (specifically the bottom end) being used as a rat run. - Raby Mews is already a rat run and should be included in the CAZ. - This area has schools e.g. King Edwards school and Bathwick St Marys and pupils deserve clean air. These areas should be in the zone. There was concern that the current boundary would increase traffic past the school, resulting in safety concerns. - Bathwick St Mary's Church School specifically requested to be included within the zone. - The area is well used by pedestrians for example using Bathwick Hill to access the University and many buses use Bathwick Hill and these are perceived to be particularly polluting. - The CAZ should include the three main routes to the University. - The junction of Bathwick Hill and the A36 should be included, at least. - North Road is particularly unsuited to heavy vehicles and has subsidence issues, they currently don't adhere to the weight restrictions in this area and there are concerns this would get worse with CAZ implementation, so it should be included.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Some respondents felt this area should be included alongside the Great Pulteney Street area (the area described above). Others commented specifically on these roads and did not mention the area above. - Some respondents who called for the Bathwick area to be included in the zone also called for inclusion of the Great Pulteney Street/Henrietta Road area. - This area will get busier in future with the development of the former MoD site. - The zone should extend as far to the east as it does to the west. - However, one response acknowledged that some local residents were calling for this area to be included and noted that not all local residents support this extension proposal.
<p><i>Link between Widcombe Hill and Bathwick Hill</i></p> <ul style="list-style-type: none"> - Sydney Buildings - Horseshoe Walk - Abbey View - The Tynning 	<ul style="list-style-type: none"> - The Tynning, Abbey View, Horseshoe Walk and Sydney Buildings should be included to prevent rat running between Widcombe Hill and Bathwick Hill and Pulteney Road and to prevent these areas becoming a drop off zone. - There are also concerns over the area having increased parking and dropping off issues. - Concern over placement of cameras in sensitive area, especially on the canal bridge. - Sydney Buildings Householders Association requested that this area be included to help prevent rat running. This route is currently considered dangerous at peak times, with narrow sections and bends.
<p><i>Bathampton/Batheaston</i></p>	<ul style="list-style-type: none"> - Parts of Bathampton should be included within the CAZ, specifically the toll bridge/Mill Lane/London Road West and the A36. This would prevent traffic re-routing over the toll bridge and through the High Street, an already congested area. This would also prevent making the air quality worse, in a sensitive area due to the presence of a school. - Batheaston Parish Council suggested that the CAZ be extended to include the toll bridge roundabout, the High Street, Bathampton village, Warminster Road and North Road. - Bathampton Parish Council asked for consideration of an extension to the CAZ to include all of Bathampton, including the bottom of Warminster Road and North Road and including a 'bubble' CAZ covering Mill Lane. They noted that including the whole of Bathampton would have implications to residents and visitors. - A mini CAZ for Bathampton was suggested to avoid increased traffic in Bathampton/over the toll bridge. - There was some concern that the amount of traffic using these areas as a result of the CAZ was underestimated. - Concern that Bathampton will become a parking area for commuters, shoppers and people parking and then cycling or catching public transport. - Bathampton Primary School would support an extension of the zone into Bathampton.
<p><i>Widcombe area</i></p> <ul style="list-style-type: none"> - Widcombe Hill and surrounding area - Church Street 	<ul style="list-style-type: none"> - Widcombe is a high density residential area and is central so should be included. - Widcombe should be included as it currently has severe congestion and is one of the more polluted areas of Bath.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - Prior Park Road - Forefield Rise - Lyncombe Hill - Greenway Lane - Lyncombe Vale - Millbrook Place - Rosemount Lane 	<ul style="list-style-type: none"> - The zone should extend further up Widcombe Hill as far as The Tying, Church Street or Darlington Place. - The zone should extend further up Prior Park Road, possibly up to Ralph Allen Drive. - Millbrook Place, Widcombe should be included as this already has parking problems. - The bottom of Lyncombe Hill is frequently used as a drop off point and a cut through to Prior Park Road, if it is outside the zone this could increase. - Greenway Lane and Lyncombe Hill are favoured rat runs. Specific request to include Lyncombe Hill in the zone. - Concern that the inclusion of Claverton Street will lead to rat running on Lyncombe Vale and Rosemont Lane. Some felt these routes should be included in the zone. - Include Forefield Rise, Rosemount Lane and Church Street. - Widcombe C of E Junior School commented that they support the proposed boundary, which now includes Widcombe school and would like to see a larger area of Widcombe and Pulteney Road included.
<p><i>Larger stretch of the A36 Lower Bristol Road</i></p> <ul style="list-style-type: none"> - Windsor Bridge - Lower Bristol Road - Twerton - Midland Road 	<ul style="list-style-type: none"> - Respondents made a range of comments relating to the A36. Some felt that all of the A36 should be included in the zone, for example to the junction with Bellotts Road. Others highlighted specific sections. - This area should be included as idling traffic is the norm and it is a rat run. - The zone should include Midland Road/Destructor Bridge and Western Riverside Development otherwise these routes will become a rat run between the A4 and the A36. - Including Windsor Bridge would force traffic further out and would be more of a deterrent. Respondents frequently called for Windsor Bridge to be included as this is a congested route and suggested that it should be the western extent of the zone, and that this will help prevent rat running through Oldfield Park. Others went further to suggest that the A36 should be included out to Lidl. - Twerton should be included and already suffers from pollution. - Extend to Dorset Close to include routes to Oldfield Park infants. Also include Hayesfield School and the surrounding roads. - Include Bath Western Riverside. - South West Transport Network and Bus Users UK felt the whole of the A36 should be included.
<p><i>Longer length of the A367 Wells Road</i></p> <ul style="list-style-type: none"> - Wells Road - Oldfield Road - Bloomfield Avenue - Bloomfield Road - Hatfield Road - Englishcombe Lane - Entry Hill - Holloway 	<ul style="list-style-type: none"> - More of/all of the A367 Wells Road should be included as air quality is poor, the route is congested and buses from the Park and Ride are held up in congestion. - Including more of Wells Road would help to prevent areas to the west, particularly Oldfield Park, being used as rat runs. - Hayesfield Park Road should be included otherwise it would be used for parking or as a short cut. - Various suggestions as to where the boundary should end: <ul style="list-style-type: none"> - South of the junction with Oldfield Road, therefore including this junction to prevent rat running along Oldfield Road and Junction Road. FoBRA supported this view. (Note that there was some

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - Hayesfield Park Road - Frome Road - Bradford Road 	<p>confusion as to whether the boundary at Oldfield Road was shown correctly on the map or whether the proposal had changed since publication. The consultation map correctly showed the boundary to the north of Oldfield Road).</p> <ul style="list-style-type: none"> - At the junctions of Bloomfield Avenue, Bloomfield Road or Englishcombe Lane/Hatfield Road (As supported by the <u>Bear Flat Association</u>). - <u>South Stoke and Midford Parish Council</u> supported an extension up to the Midford Road junction - Other suggestions that the zone should extend as far as the Red Lion/Frome Road junction or the Park and Ride and to include Rush Hill, Frome Road, Bradford Road, Englishcombe Road and North Road. Suggestion also that Hensley Road and Egerton Road should be included. - Extending further up Wellsway will help to prevent Greenway Lane becoming a rat run. The CAZ should include Greenway Lane. - Concerns that Magdalen Road and Holloway will become a drop off zone as these are the closest streets to the southern boundary, including them may mitigate this. Request to include Holloway in the zone. - Extend the zone out to Bear Flat. <u>The Bear Flat Association</u> requested to extend and clarify the CAZ boundary around the Wells Road up to the junction with Greenway Lane/Englishcombe Lane. - <u>South Stoke and Midford Parish Council</u> would like to see the CAZ boundary extended up the Wells Road to Midford Road
<p><i>Oldfield Park area</i></p> <ul style="list-style-type: none"> - Dorset Close - Bellotts Road - Brook Road - Brougham Hayes - Moorland Road - Upper Oldfield Park - Oldfield Road - Junction Road (B3111) - King Edward Road - Bloomfield Avenue - Coronation Avenue 	<ul style="list-style-type: none"> - Concern that the current boundary will force traffic and parking into Oldfield Park and cause worsening air quality. The CAZ should extend further west to include the Oldfield Park area. - Oldfield Park is one of the more polluted areas. - These are routes that would be used to avoid the zone and are already used as rat runs. - Moorland Road should be included to avoid it being used as a route to the motorway/to prevent it becoming more congested/ it has poor air quality - Oldfield Park should be included up to Brook Road/Bellotts Road/Using Linear Park as the boundary. - All of Oldfield Park should be included. The boundary should be extended to Oldfield Road, as this is already a rat/run and this problem would be worsened if not included. Also, other respondents suggested the boundary should be further out again, to Bloomfield Road. The Oldfield Road/Wellsway junction should be included. - The B3111 Junction Road would otherwise carry more traffic and is unsuitable for increased traffic. It should be included within the zone or reclassified. - <u>The Lower Oldfield Park Residents Association</u> commented that the boundary should include the B3111 and Bloomfield Avenue. - Some felt an extension to include Oldfield Park would be less necessary if traffic were allowed to turn left from Brougham Hayes onto the Lower Bristol Road without entering the CAZ.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Bloomfield Avenue, Oldfield Road, King Edward Road and Moorland Road should be included. - There are various nurseries, residential homes, doctors' surgeries and schools in this area that should be included, with particular calls for Oldfield Park Infant School to be included within the zone. - However, others felt that Oldfield Park surgery should not be in the zone.
<p><i>A4 Upper Bristol Road/Newbridge Road</i></p> <ul style="list-style-type: none"> - Upper Bristol Road - Newbridge Road - Kelston Road - Ashley Avenue - Station Road 	<ul style="list-style-type: none"> - All of the Upper Bristol Road should be included, towards Newbridge and the Park and Ride. - Specific mention of industrial operations on Newbridge Road that generate high numbers of HGVs and would be deterred by the CAZ. - Newbridge Road is currently being used as parking for LGVs and for the hospital. If the area is not included in the CAZ these pressures will increase. - Air quality on Newbridge Road is currently poor. Concerns this would be worsened if not included in the zone. - Include Ashley Avenue (adjacent to Windsor Bridge) or otherwise deal with parking issues. - Concern that Station Road is already used as waiting zone for taxis. - Access should be allowed to the Brassmill industrial estate. - Extend the area further west to include Kelston Road/Oldfield School. The Edward Street area in Lower Weston is used currently for commuter parking and should be included in the CAZ to avoid this getting worse.
<p><i>Weston/Victoria Park area</i></p> <ul style="list-style-type: none"> - Lansdown Lane - High Street (Weston) - Weston Road - Combe Park - Park Lane - Edward Street 	<ul style="list-style-type: none"> - Include more of/the whole of Weston. - Weston could become a major route to the M4, increasing traffic on unsuitable and steep roads, where there have been fatal accidents in the past. - Extending further west will prevent Weston village being used as a short cut to the motorway. - Sion Hill should be included in the zone as should the Cavendish Road/Sion Hill junction. - Concern that Park Lane will become a rat run if not included. - Weston Lane should be included to avoid rat runs through residential streets. - Extend further west to ensure the Victoria Park play area is well inside the zone. - The Edward Street area in Lower Weston is currently used for commuter parking and should be included in the CAZ to avoid this getting worse.
<p><i>Lansdown</i></p> <ul style="list-style-type: none"> - Lansdown Road - Lansdown Place - Lansdown Crescent - Upper Lansdown Mews 	<ul style="list-style-type: none"> - Lansdown Crescent is already a rat run. The CAZ would increase traffic and pressure for parking. - The CAZ should extent further along Lansdown Road. Suggestions included as far as the junction with Sion Road or to the Park and Ride. - Areas off Lansdown Road are currently not within the Residents Parking Scheme – concern that the CAZ would lead to increased pressure for parking in these areas, e.g. Upper Lansdown Mews. - <u>Lansdown Crescent Residents Association</u> support the proposed boundary in its inclusion of St Stephen's Church but asked that consideration be given to moving the camera at Cavendish Road to Sion Road to avoid cars undertaking dangerous manoeuvres.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
Camden Area - Belgrave Crescent - Camden Road/Crescent	<ul style="list-style-type: none"> - General concern that these areas would become a rat run if they are not included, including Camden Road, Eastbourne Avenue and Claremont Road - Respondents who wished to see more of Camden included also supported an extension of the zone along the A4 London Road. - The zone should start further east, perhaps at Frankley Buildings – the current boundary will encourage Belgrave Crescent to be used for turning and it is not appropriate for this. Camden Residents Association noted this issue and requested clear signage to discourage drivers making unsuitable manoeuvres. - Extend the boundary out to Bennetts Lane to included Belgrave Crescent. Concern that Gays Hill is not a good turning place or escape route. - Extend the zone to include Tynning Lane/Eastbourne Avenue.
Schools	<ul style="list-style-type: none"> - Respondents expressed concerns about schools not being included in the CAZ. - The CAZ should include the areas around Bathwick St Mary's, King Edward's, Beechen Cliff, Hayesfield, The Paragon, Royal High School and Oldfield Park Infant's School. - There was serious concern that the CAZ may increase traffic past schools by diverting traffic into areas around schools. - Bathwick St. Mary's School specifically requested to be included in the zone.
Wider area	<ul style="list-style-type: none"> - Some respondents felt that the zone should cover the whole city and extend out as far as the Park and Ride sites. - Bath Preservation Trust and Bathampton Parish Council called for consideration of the CAZ boundary to extent to the WHS boundary. - Some respondents suggested that routes further out from the centre should somehow be included, to prevent rat runs. North Claverton and Bradford Road were mentioned.

7.3.4 Requests for the exclusion of streets from the CAZ from individuals/groups

Table 7-2 lists the roads that respondents would like to see **EXCLUDED** from the CAZ or routes where they expressed concern about their inclusion (Table 7-2). Please note therefore that not all comments reported here were outright requests for exclusion. These comments are reported together to highlight the range of issues that were highlighted in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. That is, whilst, in certain locations some respondents expressed concern that their area was included within the CAZ/requested for their area to be excluded, other groups felt that the better solution was for that area/additional streets to be included/for the zone to be made larger. The opposing views are set out in the previous Section.

Table 7-2: Requests for exclusion of streets/areas in the CAZ

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<p><i>A4 London Road/A36 Cleveland Place Junction</i></p>	<p>Respondents identified the junction of London Road and Cleveland Place as an area they would like to see removed from the zone, or an area that they felt caused issues through its inclusion. The reasons for this view included the following:</p> <ul style="list-style-type: none"> - To allow traffic to get around/out of the city, to the motorway (M4) and to the A36 Warminster Road or the A4/A46. Respondents expressed concern about the inclusion of the A4, the A36 and the A367 – all the through routes – given that there is no bypass/alternative route. - To allow traffic to get from the east of Bath to the University and other destinations such as the fire and ambulance station, as well as schools south of Bath and the hospital. - This is one of very few river crossings and there are no alternative routes (other than the Batheaston toll bridge). - Inclusion of this junction will encourage more traffic to use routes through Batheaston and Bathampton, including the toll bridge, and this will have knock on effects for residents in this area. - Traffic would seek alternative unsuitable routes through local towns, for example; Bradford on Avon, Winsley and Limpley Stoke or via unclassified roads. - It would be unsafe if drivers decided to make a last-minute change of route to avoid the CAZ. There is no space to turn. - Some drivers would incur the charge just for using this corner. Respondents felt strongly that drivers using this junction to get out of the city should not be penalised and emphasised that many vehicles using this junction are not entering the city centre. - Concern that the inclusion of this junction is generated by a desire to make money/collect additional charges. - Respondents felt that the above issues could be addressed by a small change to the boundary at the junction. - Without an A46/A36 bypass this corner is unavoidable for many trips. - Concern that including this corner restricts access to Morrison's. - This junction is on an important route to the hospital, especially from Wiltshire. - <u>Avon and Wiltshire Partnership NHS Trust, Hilperton Parish Council, Heywood Parish Council, Winsley and Westwood Parish Council and Westbury Town Council</u> all support exclusion of this junction.
<p><i>East of A36 Pulteney Road</i></p> <ul style="list-style-type: none"> - Lime Grove/Lime Grove Gardens - Pulteney Gardens - Pulteney Avenue - Horseshoe Walk 	<ul style="list-style-type: none"> - Residents of these streets with non-compliant vehicles would need to pay the charge even if heading out of the city – they would pass through a very small section of the zone. These streets do not need to be in the zone. - Lime Grove Gardens is fully within the zone but is a dead end. - Boundary seems illogical to residents. - Concern about impact of cameras and signage on canal bridge on Pulteney Gardens.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<p><i>Widcombe:</i></p> <ul style="list-style-type: none"> - <i>Widcombe Hill</i> - <i>Prior Park Road</i> - <i>Claverton Street</i> - <i>Lyncombe Hill</i> 	<ul style="list-style-type: none"> - Widcombe is not part of the city centre. - Residents need to be able to access the shops in Widcombe and including the Widcombe loop affects this. - The current boundary would affect access to Armes Court. - The current boundary would affect access to Widcombe Infant School. - Non-compliant vehicles turning from Widcombe Hill into Prior Park Road would incur a charge for clipping the edge of the zone. - As proposed, the CAZ will mean that Church Street/The Tynning will be used as a rat run. - The current boundary will encourage rat running on Greenway Lane and lead to worsening of parking problems on Lyncombe Vale which does not have residents parking. This will cause problems near to The Paragon School. - Widcombe Baptist Church should be outside of the zone to allow access for the congregation. - The boundary near the A36 should allow pick up/set down close to Halfpenny Bridge, by allowing access around the Widcombe loop. - <u>Foxhill Residents Association</u> requested the removal of the Widcombe loop.
<p><i>A36 section including:</i></p> <ul style="list-style-type: none"> - <i>Lower Bristol Road</i> - <i>Claverton Street</i> - <i>Rossiter Road</i> - <i>Pulteney Road</i> 	<ul style="list-style-type: none"> - Respondents felt that the A36 should not be included in the zone because it is a main road, it is the main route around Bath, main east/west route, a key route to the motorway and there is no alternative route. - There needs to be a way for traffic to get around the perimeter of the city. There should be at least one through route. - There were various suggestions about where the zone should end. Typically, respondents suggested that this route should be excluded up to the Churchill Bridge roundabout/the A36/A367 junction or from Westmoreland Road and Midland Bridge. - <u>The Road Haulage Association</u> expressed a strong view that the A36 should be excluded from the zone. - <u>Trowbridge Town Council</u> and others requested for the A36 to be excluded from the CAZ. - <u>The British and Vehicle Licensing Association</u> noted concern about inclusion of A36, due to the impact on freight movement. - HGVs need to use this route and there are not suitable alternatives for HGVs. - The A36 is not part of the city centre (respondents felt the CAZ should only cover the city centre). - No need to include routes south of the river/the CAZ should only cover the area of the city to the north of the river, they also argued that the river would be a more logical southern boundary, <u>Heywood Parish Council</u> support this. - This route is important to access supermarkets and retail outlets (Sainsburys, Homebase and Lidl) and petrol stations (see below). - Including the A36 will encourage more traffic to rat run through residential areas, particularly Oldfield Park, Combe Down, Claverton Down and Twerton and between Newton St Loe and Hinton Charterhouse and Bradford on Avon. Particular concern about HGVs taking alternative, inappropriate routes. - Including this route will affect many people's frequent journeys, for example to work, to the motorway and to the RUH. It is an important route for commuters.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Many of those who requested the exclusion of the A36 specifically highlighted the need to exclude the junction of the A36 and the A4 London Road (see below). - It was noted that the A36 is sometimes used as a diversion route and questions asked about how this would work if it were in the CAZ. - Churchill Bridge and Midland Bridge should not be included. - Including the A36 affects lower income families in Twerton, Newbridge and Weston. - There was concern that inclusion of the A36 was driven by a desire to raise additional revenue. - As well as asking for the part of the A36 currently included in the zone to be excluded, respondents asked that the section currently not included (Bathwick Street) should not be included, as this is part of the through route. - Businesses located off the Lower Bristol Road, such as in the Midland Bridge area, should not be in the zone. - The A36 is an important route to the hospital from the east/south of Bath. - <u>Foxhill Residents Association</u> requested that Rossiter Road and the Widcombe area be removed from the CAZ.
A367 Wells Road and Churchill Gyratory (Junction with A36)	<ul style="list-style-type: none"> - Respondents who requested for the A36/Lower Bristol Road to be excluded typically also mentioned Wells Road. The A367 is an arterial route and should not be included as it is an important route out of/around Bath. - Without a bypass, for many trips there are no appropriate alternative routes. - Respondents felt that the zone extends too far south and need not include Wells Road. - The A367 is an important part of the route for traffic from the south of Bath accessing the motorway. - There was concern that including Wells Road, as shown, would lead to rat running through Oldfield Park, Combe Down, Lyncombe Hill and surrounding villages. - Concern that including Wellsway will increase traffic on Junction Road and Lower Oldfield Park. - Wells Road is a main route to the railway station and the RUH from the south of Bath. - This affects access to schools such as Hayesfield School, Beechen Cliff, Ralph Allen and local services in Oldfield Park. - Hayesfield Park should be excluded because this disadvantages residents. - This will affect businesses on the trading estate. - Including this area would affect the local shopping areas. - This affects access to the Park and Ride at Odd Down. - It was noted that the A367 is used as a diversion route and that it would be unfair to charge people under these circumstances. - Including the junction of Upper Oldfield Park and Wellsway was considered illogical as this would force traffic down the B3111, which is unsuitable for increased traffic. If this junction were outside the CAZ it would enable access from the south to the doctor's surgery on Upper Oldfield Park. - Inclusion of the section between Upper Oldfield Park and Oldfield Road affects residents but does not seem to add much benefit.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Upper Oldfield Park Residents Association specifically requested that the boundary of the CAZ remain at the intersection of Wells Road and Oldfield Road. - It was suggested that it should be possible for vehicles to cross Wellsway without charge.
<p><i>Route to allow access to Sainsburys and the petrol station, Green Park, Homebase etc</i></p> <ul style="list-style-type: none"> - A36/Lower Bristol Road - Pines Way - Bath Riverside Development - Stothert Avenue - Midland Bridge 	<ul style="list-style-type: none"> - Respondents felt residents ought to be able to access these facilities without entering the CAZ, especially given that accessing Morrison's on the east of Bath would require driving through the zone. - Excluding the Pines Way Gyratory here would give an opportunity for drivers who do not want to enter the CAZ to turn around. - Midland Bridge, allowing the gyratory to be outside, would be a more appropriate boundary. - If the Sainsbury's is within the zone it will discourage people from shopping locally and result in people shopping at alternative locations, such as Keynsham. - Preventing access to the petrol station will result in people driving further to fill up. Sainsbury's also offers a pharmacy which is open late. - It would affect the farmers market. - It will mean that residents of Western Riverside Development; (Stothert Avenue and streets off, including Albert Crescent, Percy Terrace and Victoria Bridge Road) have to enter the zone to exit their street as the other end of Stothert Avenue is to become a bus gate. If Pines Way is included in the zone, vehicles need to be allowed to use the Destructor Bridge. - Weekly shopping and DIY materials cannot be carried by bus. - Inclusion of this area affects access to the industrial estate. - Inclusion of Pines Way affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park.
<p><i>Brougham Hayes Road/Junction with A36 Lower Bristol Road</i></p>	<ul style="list-style-type: none"> - Concern that traffic turning left from Brougham Hayes onto the Lower Bristol Road westbound (and vice versa) will incur a charge for a journey that is not going into the city centre. This route is used to access the RUH and destinations towards Bristol and by residents from Westmoreland. Concern that many drivers will incur a charge for clipping the very edge of the CAZ. - Concern that including this junction will lead to rat running through Oldfield Park, Twerton and on Dartmouth Avenue, West Avenue, Moorland Road, Lyndhurst Road, Millmead Road, Ringwood Road, Brook Road, Bellotts Road, past Oldfield Park Junior School and across Windsor Bridge. - School buses use this junction. - Inclusion of this junction affects access to Hayesfield School and access to the hospital. Hayesfield School specifically asked for the junction to be removed from the zone. - Inclusion of this junction affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park - If this junction is included it impacts residents of Oldfield Park who need to access the city or the motorway. - There was concern that this junction had been included to raise revenue. - Hilperton Parish Council requested an exclusion of this junction to allow access from the south of Bath to RUH. - It should be noted that Upper Oldfield Park Residents Association specifically commented that this junction should remain inside the CAZ.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<i>South of A36</i>	<ul style="list-style-type: none"> - Westmoreland Street, off the A36, is a dead end but included on the edge of the zone – there is no alternative but to enter the zone. - There is no need for the zone to cover the houses to the south of the Lower Bristol Road.
<i>A4 Upper Bristol Road</i>	<ul style="list-style-type: none"> - Upper Bristol Road should be excluded as it is a key through route. It is important to allow people to move across the city. - Argos should not be included.
<i>Victoria Park/Weston area to include:</i> <ul style="list-style-type: none"> - <i>Weston Road</i> - <i>Marlborough Road</i> - <i>Cavendish Road</i> - <i>Cranhill Road</i> - <i>Julian Road</i> - <i>Park Lane</i> 	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access Victoria Park, a public amenity, without entering the zone and felt that if it were included they and their families would use these facilities less and this would lead to people undertaking less exercise. - Including Victoria Park hinders access to the golf course. - Families ought to be able to access, at least, the western part of Victoria Park. - Concerns that including the park will affect tourism and is included to make money from visitors. - It was noted that the park is used as a Park and Walk location. - This area, extending out to Julian Road and Weston Road and areas to the north, are lightly trafficked and emissions here are low and therefore should not be included. These are also important routes out of the city. - Including the areas north of Weston Road is likely to lead to congestion and parking problems in Sion Hill and Lansdown. - Inclusion of this area prevents traffic from going north-south through the city. - Some respondents felt that drawing the west boundary to Marlborough Lane/Cavendish Road /Weston Road would be preferable. - Inclusion of Cavendish Road was considered unnecessary by some (although note that the Cavendish Road Society stated they were pleased to see this road included in the zone). - Excluding Marlborough Road would allow access to Charlotte Street car park without entering the zone. - Concern that Weston Park will see increased pressure for parking. - Concern that routes in this area (Weston Lane, Julian Road and Marlborough Road) are used to access the hospital. - Social housing on Julian Road would be negatively affected – this road should not be included. - Respondents were keen to see Park Lane outside the CAZ (some respondents were not clear that it is not included in the boundary proposed). - Respondents felt it was not necessary to go as far out as Victoria Park or Weston. - Cranhill Road and Cranhill Nursing Home should be outside of the CAZ (detailed boundary change). Cranhill Road is a small cul-de-sac of 8 homes.
<i>Lansdown/Walcot</i> <ul style="list-style-type: none"> - <i>St James Park</i> - <i>Lansdown Crescent</i> - <i>Lansdown Place East</i> 	<ul style="list-style-type: none"> - The zone should be kept more central and not extend up Lansdown Road. It should stop before St. Stephen's Church. - The zone should not include St. James's Park as this area does not have existing issues. - St. Stephen's Close should not be included as non-compliant vehicles turning up the hill and out of the city will incur a charge for clipping the edge of the zone.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<ul style="list-style-type: none"> - Upper Lansdown Mews - Richmond Road - Lansdown Road - Lansdown Grove - St Stephen's Road - Mount Road - St Stephen's Close 	<ul style="list-style-type: none"> - Including the corner of Lansdown Road and Richmond Road will encourage traffic to rat run through Charlcombe Lane, which is narrow and unsuited to additional traffic. The boundary should be moved slightly south to allow turning from Lansdown Road into Richmond Road. - Lansdown Grove and St. Stephen's Road area should not be included as traffic heading north would clip the edge of the zone. - St Stephen's Road does not need to be included, with a sharp hair pin bend it is very unlikely to become a rat run. The CAZ should start below the St Stephen's Road junction. Concern that the boundary as drawn includes the private access road to a single dwelling and the zone could stop further down the road, although the property owner generally supports St Stephen's Road being in the zone to prevent rat running. - Mount Road residential area does not need to be included because it is mainly older people, few cars and very low mileage users. - This area is not considered to be polluted.
<p>Camden area</p> <ul style="list-style-type: none"> - Camden Crescent/Road - Belgrave Crescent 	<ul style="list-style-type: none"> - Concern expressed that inclusion of Camden Road and Camden Crescent, as well as Weston Road prevents routes across the city. - One respondent noted that Belgrave Crescent, which is currently on the edge of the zone, should not be included in any boundary change/extension. This would not be necessary to tackle emissions.
<p>Central area</p> <ul style="list-style-type: none"> - Car Parks 	<ul style="list-style-type: none"> - Residents expressed concern about the inclusion of various central streets because of the impact this would have on their own personal journeys, including George Street, High Street, Dorchester Street, James Street West, Kingsmead, Morford Street, Norfolk Crescent, Northampton Street, Queen Square, Royal Crescent, The Paragon and the area around The Forum, - Car parks, including Avon Street, Southgate and Charlotte Street should be excluded.
<p>Pick up/drop off areas</p>	<ul style="list-style-type: none"> - Respondents commented that the area around Halfpenny Bridge is a useful place to set down passengers and felt that a convenient drop off location should be accessible without entering the CAZ.

7.3.5 Concern about journeys that would be impacted by the CAZ from individuals/groups

Respondents expressed concern that the proposed CAZ would prevent them making or impact specific journeys or accessing particular destinations and called for routes to these destinations to be excluded from the CAZ. Comments received are shown in Table 7-3 and included:

Table 7-3: Concerns about journeys into or through the CAZ.

Destination or journey identified	Detail given/comments made
<i>East west and north south routes/routes across the city</i>	<ul style="list-style-type: none"> - Respondents felt that the boundary should acknowledge the need for routes to go east-west and north-south across the city, including to the motorway, particularly as there are no alternative routes. Generally, respondents felt that there should be routes around the CAZ. - Inclusion of the A4, A36 and A367 make it difficult to undertake journeys across and around Bath without entering the CAZ. It was particularly noted that traffic that needs to go between the A36 and the A46 has little option but to route through the CAZ. - Many trips are not going to the city centre – traffic needs to be allowed to go around Bath. - There was concern that inclusion of the main routes penalises residents living in Bath but working elsewhere i.e. it impacts on their journeys to leave the city. - Concern that this will have impacts on surrounding areas, such as Bradford on Avon. - There was concern that the boundary includes too many of the practical routes that residents need to use to move around the City.
<i>Access to the RUH</i>	<ul style="list-style-type: none"> - There was particular concern that the main routes to the RUH from Wiltshire/east of Bath are included within the proposed CAZ boundary and also the route to the University (specifically the London Road/Cleveland Place junction).
<i>River crossings</i>	<ul style="list-style-type: none"> - Respondents felt the CAZ should not cover all the river crossings.
<i>Access to the M4</i>	<ul style="list-style-type: none"> - Many trips to the motorway, for example from the south of Bath, would enter the CAZ even though they are heading out of the city. Respondents felt that the CAZ should not impact on access to the motorway. - Radstock Town Council and Midsomer Norton Town Council were concerned about access from the south of Bath to the M4. - There were concerns that routes taken to avoid the CAZ would impact on other areas, in particular Wiltshire towns and villages.
<i>Car Parks</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access main car parks (particularly Charlotte Street and Avon Street) without entering the zone or that there should be more parking on the edge of the zone. - There was concern that including the car parks would mean that the Park and Ride would become overloaded.
<i>Supermarkets</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access supermarkets without entering the zone. - There was particular concern that Sainsbury's, Homebase and Waitrose are included within the zone, but respondents also noted that accessing Morrison's would be impacted for anyone approaching from the city side.
<i>Petrol stations</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access petrol stations without entering the zone, and that the zone prevents access for some to the main Bath petrol stations.
<i>Bus and rail station</i>	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access/drop off at these public transport hubs without entering the zone. Respondents noted that the Park and Ride is not a viable option for rail journeys that return late at night.

Destination or journey identified	Detail given/comments made
<i>Public buildings/services</i>	- Respondents commented that routes to public buildings, shops and services should not be included in the CAZ, with particular mention of the sports centre/ The Rec, college, schools, parks, council buildings, University, recycling centre, hospitals, doctors' surgeries, Royal Mail sorting office and places of worship.

7.3.6 Alternative boundary solutions identified from individuals/groups

Within the responses a number of suggestions for alternative ways of determining the CAZ boundary were suggested. These included:

- Include only main roads and exclude all local roads. This would allow residents to travel within their immediate areas without incurring a charge for non-compliant vehicles.
- Charge people to enter the zone via entry points located further out of the City. For example, at the bridges or major junctions.
- Initially allow trips within the zone to be undertaken without a potential charge/ sunset period.
- The CAZ should be considered to line up with Residents Parking Zones (RPZs).
- The CAZ boundary should align with the World Heritage Site boundary.

7.4 Comments from business respondents

Responses to Question 1 of the business questionnaire highlighted both issues and implications for businesses and business operations and individual/personal implications of the boundary. It should be noted that where comments were identified as being from individuals or related to residents and not businesses or business operations, these have been included above. The Sections below therefore only report comments related to the proposed CAZ boundary that directly reference impacts on businesses or business operations, including the identified impacts on customers, suppliers, deliveries, employees and visitors to Bath.

7.4.1 General comments on the size of the CAZ from businesses

Business respondents had mixed views about the size of the current proposed boundary. These views were similar to those mentioned in Section 7.3.1.

Some business respondents would not change the proposed boundary and support the current boundary. Others thought the boundary should be smaller, covering only the city centre, north of the river and others didn't think there should be a boundary at all.

Business respondents commented more generally about the potential impacts of the proposed zone boundary on business operations as opposed to on the specifics of the boundary placement. Most boundary placement suggestions were made from the perspective of residents in Bath and have therefore been included in the reporting above.

In particular, there was concern about access to/for deliveries, customers and staff:

- Businesses with premises within the zone raised concerns that they could be cut off from customers and deliveries.
- Those businesses located outside of the zone were concerned staff, customers or suppliers would have to travel through part of the zone to access their premises.
- Some business respondents were concerned about the impacts on tourists and the number of visitors to their businesses if car parks were inside the zone.

7.4.2 Requests for the exclusion of locations from the CAZ from business respondents

Specific requests from business respondents to exclude areas from the CAZ are shown in Table 7-4 and included:

Table 7-4: Requests of exclusion of streets/areas in the CAZ by businesses.

Detail given/comments made
<ul style="list-style-type: none"> - There was some concern as to why the business and commercial areas south of the river have been included in the zone but the residential areas including by Windsor Bridge had not. - There were requests for arterial roads to be excluded from the boundary, specifically to enable HGVs and business freight traffic heading towards the M4 to do so without incurring a charge. - Exclude the Pines Way gyratory and the Lower Bristol Road to the junction with Lower Oldfield Park from the CAZ to allow access to suppliers.

7.4.3 Concern about journeys that would be impacted by the CAZ raised by business respondents

Comments from business respondents concerning journeys that would be impacted by the proposed CAZ are shown in Table 7-5.

Table 7-5: Concern about journeys through or into the CAZ by businesses.

Destination or journey identified	Detail given/comments made
<i>Through routes</i>	<ul style="list-style-type: none"> - Through routes should be free of charge - Concern about business road users who do not need to access Bath but do traverse it or only need to travel through the proposed boundary for a short distance to access an area outside of the zone.
<i>Access to suppliers</i>	<ul style="list-style-type: none"> - There was concern that some businesses would have to cross the boundary to access suppliers such as Travis Perkins, Jewson, Magnet, Crown, Screwfix, Homebase, Brewers and Davies and suppliers on Monmouth Street would be in the zone. Therefore, they would be charged every time they needed supplies, even if working outside of the proposed CAZ. This concern was frequently raised by LGV drivers and tradesmen. - Concern about the wider movement of goods and services in the South West.
<i>Petrol Stations</i>	<ul style="list-style-type: none"> - There was also concern among business respondents about the inclusion of petrol stations within the zone. Respondents felt that it would disadvantage them if they could not refuel without driving long distances, most likely completely out the way of their location of work.
<i>Train Station</i>	<ul style="list-style-type: none"> - There were requests for Bath Spa train station to be excluded so that tourists wanting to visit the city could be collected and dropped off.
<i>Leisure Facilities</i>	<ul style="list-style-type: none"> - Some business respondents were concerned about the inclusion of leisure facilities within the zone. Specifically, the leisure centre, Pavilion and the recreation ground. Concerns were raised that their inclusion in the zone would have an impact on both staff working there and members of the public wanting to access services there. GLL (operator of the leisure centre) commented that the CAZ would impact both staff and customers. - Potential impacts on community events and deliveries made were also mentioned as a concern. - Some business respondents thought that Victoria Park should be excluded from the Zone to enable carers to take children there.
<i>Churches</i>	<ul style="list-style-type: none"> - Concern about access to churches for worshippers, staff and volunteers.

7.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Further examine the implications of a smaller zone. In particular to establish the extent to which compliance with the required air quality targets could be delivered if the boundaries were drawn tighter to the city centre. Also, to consider what the knock-on effects of removing specific locations from the CAZ would be.
- Further examine the implications of extending the zone. In particular whether including additional areas would be consistent with the objectives of the project and would be the best solution to the issues and concerns identified in these areas.

Consider the practicalities of making adjustments to the proposed boundary, for example in terms of camera and signage location and traffic routing (i.e. rat running). Consider how concerns related to specific journeys and impacts on certain groups could otherwise be alleviated, for example through concessions or exemptions.

8. Comments About the Effectiveness of the Proposed CAZ Charges

8.1 Overview

This Chapter reports:

- Comments made within Question 1 of the individuals and business questionnaires, which asked '*Are there any changes to the boundary of the proposed zone that you think we should consider?*'. Note that in both questionnaires the question on boundary was free text only, therefore there is no quantitative data for this topic;
- Comments made within the responses to other questions but that were identified as being specifically related to the proposed boundary; and
- Comments on the boundary sent in via letter or email both from individuals and businesses (although fuller details of comments submitted by letter are included in Chapter 15)

Within this Chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

This Chapter first reports the feedback from individuals and groups (Section 7.3), and then sets out the comments made by businesses (Section 7.4). In both Sections comments generally cover the following themes:

- General comments on the CAZ boundary and its implications on certain areas currently included or not included;
- Requests for additional areas to be included in the CAZ;
- Requests for specific areas to be removed from the proposed CAZ;
- Suggestions for alternative ways that the CAZ boundary could be defined; and
- Implications of the boundary position on certain journeys.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath, are reported in the individuals and groups section of this Chapter.

Overview of comments on the proposed CAZ boundary

Comments relating to the proposed CAZ boundary were extremely varied and highlight the importance of ensuring that the boundary is correctly defined. The feedback shows that there are a range of views. Whilst there was some feedback around very different ways of defining a boundary, the majority of feedback focussed on identifying potential amendments to the published proposed boundary. In summary these comments reflected:

- **Opinions that the zone should be smaller. The majority of respondents who expressed this view did so because of a desire to see through trips permitted and to ensure that every day essential journeys would not be impacted by a potential charge.**
- **Views that the zone should be larger. Whilst some respondents called for a larger zone because they felt that tackling current air quality issues in their area required bolder action, the majority of requests for a larger zone were made in response to concerns about the potential knock on effects of the CAZ.**

- Views that the zone should be designed in a way to enable specific journeys not to be charged, in particular journeys across the city, to the motorway and to key facilities, such as the hospital.
- Requests for minor adjustments to the boundaries to enable residents a route out of the city without clipping the edge of the zone.

8.2 Context for consideration of the comments made

The proposed CAZ boundary was defined based on the following rationale:

- The zone should be as small as possible to enable compliance with air quality targets and avoid impacting more people than is necessary.
- The boundary needs to be defined in a way that, as far as possible, avoids the potential impacts of rat running, allows safe opportunities for vehicles to turn around before they enter the CAZ, and minimises the impact of street clutter in the form of signage and cameras.

These principles would still need to be applied to any potential changes to the proposed boundary. It is also important to note that:

- If streets are considered for addition into the zone as a result of consultation feedback, it should be noted that residents in these areas may not have voiced their opinion during the consultation because they would not have been aware of a potential impact on them.
- If streets are considered for exclusion from the zone, it should be noted that residents in these areas may not have commented on the need for their area to be in the zone because they would have assumed that this was given.

8.3 Comments from individuals and groups

8.3.1 General comments on the proposed CAZ boundary from individuals/groups

The feedback included a range of general views on the size of the proposed CAZ. Some felt the zone was too large and should be made smaller, some felt that it was too small and should be enlarged. In some cases, respondents elaborated on this view, by specifying changes they would like to see, and these comments are reported separately in the Sections below. In other cases, a comment about the size of the zone was made in very general terms, and these are reflected here.

Those that stated that they were **generally happy with the proposed boundary** or that they broadly supported the proposals said:

- They were happy to see their street/local area/school included.
- Welcomed the zone because they felt it would make Bath a cleaner city, improve air quality and reduce traffic.
- Felt the boundaries looked logical and appreciated that they had been subject to detailed analysis.
- They were happy with changes that had been made since the original boundary (at SOC stage), to reflect comments about rat running etc.
- Did not wish to see the zone made any smaller.
- Felt that the boundaries should be monitored and reviewed.
- Could nevertheless, see that there would be some impacts, which would need to be carefully managed.

Those that commented (in general terms) that they **did not support the overall proposal for a CAZ or the boundary** identified (but where they did not make specific suggestions for amendments) typically expressed concern that:

- The CAZ should not go ahead at all or it is not the right way to address the issues.
- The proposed zone would penalise residents and not allow through traffic.
- The Scheme (generally and in relation to specific elements of the boundary) is designed to raise money for the Council.
- A CAZ would not work and is not appropriate for Bath.
- The overall proposal is short-sighted and not well thought out.

8.3.2 General comments on the size of the proposed CAZ boundary from individuals/groups

Those that expressed a general opinion that **the proposed CAZ is too big or should be made smaller** did so in range of different ways:

- The zone should include just the City Centre. Respondents defined the area they felt it should cover in different ways. For example, by saying it should cover just the City Centre (i.e. commercial/tourist zone), not include the residential areas, or should be more focused on the heart of the City, not extend to the south of the river and not extend out to the A36 or A4. The zone should cover the City Centre as it is defined in the Local Plan. Several **Parish and Town Councils** supported a smaller CAZ concentrated on the City Centre.
- The zone should allow people to travel around the outskirts of the city, from one side of the city to the other, to get out of the city, give residents more free movement and to get to important destinations such as supermarkets and petrol stations. It should therefore exclude the main routes, including the A36 and the A4.
- The zone should focus on particular locations only. The A4/London Road/Cleveland Bridge, the A36, Milsom Street, Queen Square, Gay Street, Southgate and George Street were specifically mentioned.
- There was concern that the size of the proposed zone was driven by a desire to generate revenue.
- There was concern that a zone of the size proposed would generate knock on impacts, in particular in relation to rat running.
- The zone proposed was perceived to be much wider to the west than to the east.
- There was some suggestion that the area in which cars are charged should be smaller (i.e. have a small inner Class D CAZ and a larger outer Class C CAZ).
- Respondents commented that the current boundary should not be described as central Bath.

Those that expressed the general view that **the proposed CAZ is too small or should be made larger** suggested that:

- The zone should cover a larger area generally. A wider zone was seen to mean that more people, particularly those in residential areas, would benefit from cleaner air. **Client Earth** commented that a large boundary would increase the likelihood of compliance.
- The zone should cover more of the areas where pollution is known to be a problem (e.g. London Road).
- The whole of the city should be included, the plans should be bolder, and the zone should include the whole of the World Heritage Site (WHS) (as suggested by **Bath Preservation Trust**), go out as far as the city boundary and should start at the Park and Ride sites to encourage their use.
- A larger zone would be a positive improvement. Some suggested that the charges should be lower, but the area wider.

- The zone should include all the approach roads and roads where people typically park/drop off, making the zone larger could prevent these issues being pushed to any area slightly further out of town.
- The zone should be larger to discourage people from driving around it/avoiding it/rat-running or parking on the outskirts. Respondents were sceptical that adjacent areas would not see an increase in traffic and felt that a larger zone would help to minimise these impacts. This view was echoed by many of the **residents associations**.
- The zone should include all the schools, as a way of tackling school traffic, and to improve air quality around schools.
- Some felt that the zone should either cover specific hotspots in the centre or the whole city and expressed the view that a middle ground was not appropriate.
- Given the uncertainty in the air quality modelling some respondents expressed the view that the zone should be made larger to increase the likelihood of achieving compliance with the legal limits.
- The zone should cover a larger area to decrease the number of entry/exit points and charge all vehicles entering and exiting Bath but not residents moving within the zone.
- The zone was perceived to be much more extensive to the west of Bath and some respondents felt that it should be extended to the east.

Other respondents expressed concerns about the **consequences of the CAZ**. These issues are reported in more detail in other Sections, but in brief there was concern that:

- The CAZ would encourage rat running outside the zone, in particular across the toll bridge and through Bathwick, Combe Down, Odd Down, Oldfield Park and Weston. Concern that these routes are inappropriate for more traffic and that this will lead, overall, to additional mileage. Some commented that these issues made the proposal unworkable. **The Green Party and the Liberal Democrats** both highlighted rat running as a particular concern.
- The CAZ would lead to increased traffic on routes further out, affecting outlying towns and villages, including across Wiltshire. This view was expressed by **Wiltshire Council** and several of the Wiltshire **Town and Parish Councils**.
- The CAZ would increase pressure for parking on residential roads outside the zone.
- Areas currently outside the zone would see worsening air quality due to the above.
- Concern that streets on the edge of the zone would be used for turning for those wanting to avoid entering the zone.

8.3.3 Requests for inclusion of specific additional streets within the CAZ from individuals/groups

Table 7-1 lists the roads/areas that respondents would like to see **INCLUDED** in the CAZ or roads/areas where respondents expressed concern about not being currently included in the CAZ but did not specifically request their inclusion. Please note therefore that not all comments reported here were outright requests for inclusion. These comments are reported together to highlight the range of issues that were reported in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. In certain locations some respondents expressed concern that their area was not included within the CAZ/requested for the CAZ to be made larger, whilst other groups felt that the better solution was for those areas to be removed from the CAZ/for the zone to be made smaller. The opposing views are set out in the next Section.

Table 8-1: Requests for inclusion of streets/areas in the CAZ

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<i>A4 London Road/Larkhall</i>	<ul style="list-style-type: none"> - More of London Road should be included, as this is one of the most polluted routes and traffic is often at a standstill. This view was expressed by individuals, as well as by Transition Larkhall and by South West Transport Network and Bus Users UK. - Various suggestions were made for where the zone should start, including at the junctions for Brunswick Street, Morrison's, Kensington Place, Upper Hayes East, St. Saviours Road, Claremont Road, Grosvenor Place, Gloucester Road, Alice Park, Batheaston Bypass/A46 Roundabout, Toll Bridge Road or Bailbrook Lane. Some felt the full length of London Road West into Batheaston should be included. - Respondents recognised that including London Road in the proposed zone was important. Some were surprised and concerned not to see more of London Road included. There was confusion why more of London Road was not included, given that: <ul style="list-style-type: none"> - Other less polluted streets are included. - This is a densely populated area, with schools etc. - Including more of London Road would help it to become more pleasant for people walking and cycling. - Unless more of London Road is included, traffic volumes are unlikely to decrease. - If London Road is not included people will rat run over the toll bridge and through Lansdown, Camden, Larkhall and Fairfield Park. - Streets off London Road should be included e.g. Brunswick Street, Upper Lambridge Street and Kensington Place. - Concern that if additional areas are not included Larkhall/Camden will see significant pressure for parking. - Larger areas of Walcot, Camden and Larkhall should be included. Or these areas should become access only. - Charlcombe Lane should be included to protect the roads, frogs, toads and newts. If it remains outside the boundary it will become more of a rat run.
<i>Pulteney Estate Residential area:</i>	<ul style="list-style-type: none"> - Respondents queried why this area had not initially been included in the proposed CAZ and felt that the zone should be extended to include the Pulteney Estate extending from Laura Place to Sydney Gardens, including Sydney Place, Darlington Street and the Bathwick roundabout.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - A36 Bathwick Street - A36 Darlington Street - Great Pulteney Street - Laura Place - Henrietta Road - Henrietta Gardens - Henrietta Mews - Grove Street - Sutton Street - Daniel Street - Daniel Mews - Vane Street - St Johns Road - Edward Street - William Street - Pulteney Mews - Argyle Street - Johnstone Street 	<ul style="list-style-type: none"> - Some mentioned the A36 only in this area, others called specifically for the inclusion of both the A36 and the residential area around Great Pulteney Street and Henrietta Road. - Pulteney Estates Residents Association (PERA) requested for the PERA area, extending from Laura Place to the top of Sydney Gardens and including Beckford Road, Sydney Road, Sydney Place, Darlington Street and Bathwick Roundabout and the area in between to be included in the zone. However, it should be noted that several individual respondents specifically stated that they did not agree with the residents' associations proposal to extend the CAZ to cover this area. Others suggested they would support the inclusion of this area if there were concessions for residents. - This area is predominantly residential but subject to significant stationary and slow-moving traffic and pollution is already too high. - Parking in this area is already difficult. The CAZ would create additional pressure for parking, rat running and increased use as a dropping off point (as it will be the closest area to the centre that it is not in the zone). There was concern that air pollution in this area will increase if a CAZ is implemented. If this area is excluded from the CAZ, parking will need to be strictly controlled. It was noted that access for emergency service vehicles is already difficult, because of parked cars. - Leaving this area out of the CAZ allows/encourages coaches to continue to use this area. There is particularly concern about coaches dropping off passengers at Laura Place. - Leaving this area out of the CAZ does not discourage vehicles coming in from Bathwick Hill or the Warminster Road. - Leaving this area out will increase rat running and queuing traffic/idling engines. Rat running is already a concern, for example on St. John's Road, Daniel Street and Henrietta Road as drivers try to avoid the A36. - Concern that this area is not included in the CAZ to enable parking at the rugby ground. - Leaving out this area will increase traffic on Great Pulteney Street, where noise and vibration from road traffic is already an issue. It would be the street allowing the closest access to the city centre whilst being outside the CAZ. - There are a number of significant/listed/locally important buildings/landmarks in this area which should be protected. - Excluding this area seems illogical. - Henrietta Park should benefit from cleaner air. - Respondents noted that residents in this area with asthmas and associated conditions are affected by air quality. If this area is not included it will become a rat-run and will be used by vehicles skirting around the eastern side of the city through Bathwick and Bathwick Hill. - The Rugby ground should be within the zone. There was some scepticism around the reasons why this may have been excluded. - Including these areas would create a better environment for walking and cycling. - Some respondents recognised that Bathwick Street forms an important part of the A36 through route and asked therefore for it not to be included.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Bath Preservation Trust queried why this area and the wider Bathwick area are not included in the zone and noted the need to protect the heritage as well as the people in this area. - FoBRA also suggested the boundary be extended to include Great Pulteney Street. - (Note that there is some overlap – many respondents also called for the gyratory and wider Bathwick area to be included and mentioned this area as a whole).
<p><i>Sydney Road/Sydney Place/Beckford Road gyratory</i></p>	<ul style="list-style-type: none"> - Sydney Place Residents Association specifically requested to be included within the zone and expressed concern that air quality levels have not been accurately monitored or modelled in this area. - Pulteney Estates Residents Association (PERA) also requested for this area to be included, in addition to the residential areas. FoBRA specifically requested that Sydney Gardens and Sydney Place be include in the zone. - Responses highlight that in this area there are high numbers of elderly people and sensitive historic buildings. - Concern that this area will become a rat run, a turning point and a drop off area.
<p><i>Wider Bathwick area including:</i></p> <ul style="list-style-type: none"> - Bathwick Estate - Bathwick Hill (including routes off) - Cleveland Walk - North Road - A36 Warminster Road - A36 Beckford Road - Sydney Gardens - Pulteney Road - Beckford Gardens - Rockcliffe Road - Rockcliffe Avenue - Forester Road - Forester Avenue - Sydney Mews - Raby Mews 	<ul style="list-style-type: none"> - The Bathwick area is a high density residential area. Air quality in these areas is currently poor and residents in this area also experience noise pollution. The Bathwick Estate should therefore be included in the zone. - Clean Air for Bathwick submitted a petition with 45 signatures requesting for the wider Bathwick area to be included in the zone. - Friends of Sydney Gardens have requested the inclusion of Sydney Gardens and the surrounding roads. - Bathwick Hill Residents Association stated that they supported an extension of the zone to include the Bathwick gyratory and the bottom on North Road. - Widcombe Association stated that an extension of the zone into the Bathwick estate would help address potential rat runs and support the inclusion of Great Pulteney Street. - FoBRA requested that the bottom of North Road be included in the zone. - The boundary on the A36 Warminster Road should extend to St Christopher's Close or Down Lane. This would reduce rat running on Mill Lane and across the toll bridge. - Traffic volumes including HGVs, on these routes are already very high, particularly on Warminster Road, Beckford Road, North Road and Bathwick Hill The CAZ should be enlarged to include these areas to stop this increasing. - The current boundary will push additional traffic onto these routes and including this area would prevent traffic trying to skirt around the east of Bath and avoid creating rat runs. Particular concerns about the Cleveland Walk area, North Road, Warminster Road, Bathwick Hill and Sydney Buildings (specifically the bottom end) being used as a rat run. - Raby Mews is already a rat run and should be included in the CAZ.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - This area has schools e.g. King Edwards school and Bathwick St Marys and pupils deserve clean air. These areas should be in the zone. There was concern that the current boundary would increase traffic past the school, resulting in safety concerns. - Bathwick St Mary's Church School specifically requested to be included within the zone. - The area is well used by pedestrians for example using Bathwick Hill to access the University and many buses use Bathwick Hill and these are perceived to be particularly polluting. - The CAZ should include the three main routes to the University. - The junction of Bathwick Hill and the A36 should be included, at least. - North Road is particularly unsuited to heavy vehicles and has subsidence issues, they currently don't adhere to the weight restrictions in this area and there are concerns this would get worse with CAZ implementation, so it should be included. - Some respondents felt this area should be included alongside the Great Pulteney Street area (the area described above). Others commented specifically on these roads and did not mention the area above. - Some respondents who called for the Bathwick area to be included in the zone also called for inclusion of the Great Pulteney Street/Henrietta Road area. - This area will get busier in future with the development of the former MoD site. - The zone should extend as far to the east as it does to the west. - However, one response acknowledged that some local residents were calling for this area to be included and noted that not all local residents support this extension proposal.
<p><i>Link between Widcombe Hill and Bathwick Hill</i></p> <ul style="list-style-type: none"> - Sydney Buildings - Horseshoe Walk - Abbey View - The Tynning 	<ul style="list-style-type: none"> - The Tynning, Abbey View, Horseshoe Walk and Sydney Buildings should be included to prevent rat running between Widcombe Hill and Bathwick Hill and Pulteney Road and to prevent these areas becoming a drop off zone. - There are also concerns over the area having increased parking and dropping off issues. - Concern over placement of cameras in sensitive area, especially on the canal bridge. - Sydney Buildings Householders Association requested that this area be included to help prevent rat running. This route is currently considered dangerous at peak times, with narrow sections and bends.
<p><i>Bathampton/Batheaston</i></p>	<ul style="list-style-type: none"> - Parts of Bathampton should be included within the CAZ, specifically the toll bridge/Mill Lane/London Road West and the A36. This would prevent traffic re-routing over the toll bridge and through the High Street, an already congested area. This would also prevent making the air quality worse, in a sensitive area due to the presence of a school. - Batheaston Parish Council suggested that the CAZ be extended to include the toll bridge roundabout, the High Street, Bathampton village, Warminster Road and North Road. - Bathampton Parish Council asked for consideration of an extension to the CAZ to include all of Bathampton, including the bottom of Warminster Road and North Road and including a 'bubble' CAZ covering Mill Lane.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<p>They noted that including the whole of Bathampton would have implications to residents and visitors.</p> <ul style="list-style-type: none"> - A mini CAZ for Bathampton was suggested to avoid increased traffic in Bathampton/over the toll bridge. - There was some concern that the amount of traffic using these areas as a result of the CAZ was underestimated. - Concern that Bathampton will become a parking area for commuters, shoppers and people parking and then cycling or catching public transport. - <u>Bathampton Primary School</u> would support an extension of the zone into Bathampton.
<p><i>Widcombe area</i></p> <ul style="list-style-type: none"> - <i>Widcombe Hill and surrounding area</i> - <i>Church Street</i> - <i>Prior Park Road</i> - <i>Forefield Rise</i> - <i>Lyncombe Hill</i> - <i>Greenway Lane</i> - <i>Lyncombe Vale</i> - <i>Millbrook Place</i> - <i>Rosemount Lane</i> 	<ul style="list-style-type: none"> - Widcombe is a high density residential area and is central so should be included. - Widcombe should be included as it currently has severe congestion and is one of the more polluted areas of Bath. - The zone should extend further up Widcombe Hill as far as The Tying, Church Street or Darlington Place. - The zone should extend further up Prior Park Road, possibly up to Ralph Allen Drive. - Millbrook Place, Widcombe should be included as this already has parking problems. - The bottom of Lyncombe Hill is frequently used as a drop off point and a cut through to Prior Park Road, if it is outside the zone this could increase. - Greenway Lane and Lyncombe Hill are favoured rat runs. Specific request to include Lyncombe Hill in the zone. - Concern that the inclusion of Claverton Street will lead to rat running on Lyncombe Vale and Rosemont Lane. Some felt these routes should be included in the zone. - Include Forefield Rise, Rosemount Lane and Church Street. - <u>Widcombe C of E Junior School</u> commented that they support the proposed boundary, which now includes Widcombe school and would like to see a larger area of Widcombe and Pulteney Road included.
<p><i>Larger stretch of the A36 Lower Bristol Road</i></p> <ul style="list-style-type: none"> - <i>Windsor Bridge</i> - <i>Lower Bristol Road</i> - <i>Twerton</i> - <i>Midland Road</i> 	<ul style="list-style-type: none"> - Respondents made a range of comments relating to the A36. Some felt that all of the A36 should be included in the zone, for example to the junction with Bellotts Road. Others highlighted specific sections. - This area should be included as idling traffic is the norm and it is a rat run. - The zone should include Midland Road/Destructor Bridge and Western Riverside Development otherwise these routes will become a rat run between the A4 and the A36. - Including Windsor Bridge would force traffic further out and would be more of a deterrent. Respondents frequently called for Windsor Bridge to be included as this is a congested route and suggested that it should be the western extent of the zone, and that this will help prevent rat running through Oldfield Park. Others went further to suggest that the A36 should be included out to Lidl. - Twerton should be included and already suffers from pollution. - Extend to Dorset Close to include routes to Oldfield Park infants. Also include Hayesfield School and the surrounding roads.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Include Bath Western Riverside. - <u>South West Transport Network</u> and <u>Bus Users UK</u> felt the whole of the A36 should be included.
<p><i>Longer length of the A367 Wells Road</i></p> <ul style="list-style-type: none"> - Wells Road - Oldfield Road - Bloomfield Avenue - Bloomfield Road - Hatfield Road - Englishcombe Lane - Entry Hill - Holloway - Hayesfield Park Road - Frome Road - Bradford Road 	<ul style="list-style-type: none"> - More of/all of the A367 Wells Road should be included as air quality is poor, the route is congested and buses from the Park and Ride are held up in congestion. - Including more of Wells Road would help to prevent areas to the west, particularly Oldfield Park, being used as rat runs. - Hayesfield Park Road should be included otherwise it would be used for parking or as a short cut. - Various suggestions as to where the boundary should end: <ul style="list-style-type: none"> - South of the junction with Oldfield Road, therefore including this junction to prevent rat running along Oldfield Road and Junction Road. <u>FoBRA</u> supported this view. (Note that there was some confusion as to whether the boundary at Oldfield Road was shown correctly on the map or whether the proposal had changed since publication. The consultation map correctly showed the boundary to the north of Oldfield Road). - At the junctions of Bloomfield Avenue, Bloomfield Road or Englishcombe Lane/Hatfield Road (As supported by the <u>Bear Flat Association</u>). - <u>South Stoke and Midford Parish Council</u> supported an extension up to the Midford Road junction - Other suggestions that the zone should extend as far as the Red Lion/Frome Road junction or the Park and Ride and to include Rush Hill, Frome Road, Bradford Road, Englishcombe Road and North Road. Suggestion also that Hensley Road and Egerton Road should be included. - Extending further up Wellsway will help to prevent Greenway Lane becoming a rat run. The CAZ should include Greenway Lane. - Concerns that Magdalen Road and Holloway will become a drop off zone as these are the closest streets to the southern boundary, including them may mitigate this. Request to include Holloway in the zone. - Extend the zone out to Bear Flat. <u>The Bear Flat Association</u> requested to extend and clarify the CAZ boundary around the Wells Road up to the junction with Greenway Lane/Englishcombe Lane. - <u>South Stoke and Midford Parish Council</u> would like to see the CAZ boundary extended up the Wells Road to Midford Road
<p><i>Oldfield Park area</i></p> <ul style="list-style-type: none"> - Dorset Close - Bellotts Road - Brook Road - Brougham Hayes - Moorland Road - Upper Oldfield Park - Oldfield Road - Junction Road (B3111) 	<ul style="list-style-type: none"> - Concern that the current boundary will force traffic and parking into Oldfield Park and cause worsening air quality. The CAZ should extend further west to include the Oldfield Park area. - Oldfield Park is one of the more polluted areas. - These are routes that would be used to avoid the zone and are already used as rat runs. - Moorland Road should be included to avoid it being used as a route to the motorway/to prevent it becoming more congested/ it has poor air quality - Oldfield Park should be included up to Brook Road/Bellotts Road/Using Linear Park as the boundary.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - King Edward Road - Bloomfield Avenue - Coronation Avenue 	<ul style="list-style-type: none"> - All of Oldfield Park should be included. The boundary should be extended to Oldfield Road, as this is already a rat/run and this problem would be worsened if not included. Also, other respondents suggested the boundary should be further out again, to Bloomfield Road. The Oldfield Road/Wellsway junction should be included. - The B3111 Junction Road would otherwise carry more traffic and is unsuitable for increased traffic. It should be included within the zone or reclassified. - The Lower Oldfield Park Residents Association commented that the boundary should include the B3111 and Bloomfield Avenue. - Some felt an extension to include Oldfield Park would be less necessary if traffic were allowed to turn left from Brougham Hayes onto the Lower Bristol Road without entering the CAZ. - Bloomfield Avenue, Oldfield Road, King Edward Road and Moorland Road should be included. - There are various nurseries, residential homes, doctors' surgeries and schools in this area that should be included, with particular calls for Oldfield Park Infant School to be included within the zone. - However, others felt that Oldfield Park surgery should not be in the zone.
<p><i>A4 Upper Bristol Road/Newbridge Road</i></p> <ul style="list-style-type: none"> - Upper Bristol Road - Newbridge Road - Kelston Road - Ashley Avenue - Station Road 	<ul style="list-style-type: none"> - All of the Upper Bristol Road should be included, towards Newbridge and the Park and Ride. - Specific mention of industrial operations on Newbridge Road that generate high numbers of HGVs and would be deterred by the CAZ. - Newbridge Road is currently being used as parking for LGVs and for the hospital. If the area is not included in the CAZ these pressures will increase. - Air quality on Newbridge Road is currently poor. Concerns this would be worsened if not included in the zone. - Include Ashley Avenue (adjacent to Windsor Bridge) or otherwise deal with parking issues. - Concern that Station Road, is already used as waiting zone for taxis. - Access should be allowed to the Brassmill industrial estate. - Extend the area further west to include Kelston Road/Oldfield School. The Edward Street area in Lower Weston is used currently for commuter parking and should be included in the CAZ to avoid this getting worse.
<p><i>Weston/Victoria Park area</i></p> <ul style="list-style-type: none"> - Lansdown Lane - High Street (Weston) - Weston Road - Combe Park - Park Lane - Edward Street 	<ul style="list-style-type: none"> - Include more of/the whole of Weston. - Weston could become a major route to the M4, increasing traffic on unsuitable and steep roads, where there have been fatal accidents in the past. - Extending further west will prevent Weston village being used as a short cut to the motorway. - Sion Hill should be included in the zone as should the Cavendish Road/Sion Hill junction. - Concern that Park Lane will become a rat run if not included. - Weston Lane should be included to avoid rat runs through residential streets. - Extend further west to ensure the Victoria Park play area is well inside the zone.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<p><i>Lansdown</i></p> <ul style="list-style-type: none"> - <i>Lansdown Road</i> - <i>Lansdown Place</i> - <i>Lansdown Crescent</i> - <i>Upper Lansdown Mews</i> 	<ul style="list-style-type: none"> - The Edward Street area in Lower Weston is currently used for commuter parking and should be included in the CAZ to avoid this getting worse. - Lansdown Crescent is already a rat run. The CAZ would increase traffic and pressure for parking. - The CAZ should extent further along Lansdown Road. Suggestions included as far as the junction with Sion Road or to the Park and Ride. - Areas off Lansdown Road are currently not within the Residents Parking Scheme – concern that the CAZ would lead to increased pressure for parking in these areas, e.g. Upper Lansdown Mews. - <u>Lansdown Crescent Residents Association</u> support the proposed boundary in its inclusion of St Stephen's Church but asked that consideration be given to moving the camera at Cavendish Road to Sion Road to avoid cars undertaking dangerous manoeuvres.
<p><i>Camden Area</i></p> <ul style="list-style-type: none"> - <i>Belgrave Crescent</i> - <i>Camden Road/Crescent</i> 	<ul style="list-style-type: none"> - General concern that these areas would become a rat run if they are not included, including Camden Road, Eastbourne Avenue and Claremont Road - Respondents who wished to see more of Camden included also supported an extension of the zone along the A4 London Road. - The zone should start further east, perhaps at Frankley Buildings – the current boundary will encourage Belgrave Crescent to be used for turning and it is not appropriate for this. <u>Camden Residents Association</u> noted this issue and requested clear signage to discourage drivers making unsuitable manoeuvres. - Extend the boundary out to Bennetts Lane to included Belgrave Crescent. Concern that Gays Hill is not a good turning place or escape route. - Extend the zone to include Tynning Lane/Eastbourne Avenue.
<p><i>Schools</i></p>	<ul style="list-style-type: none"> - Respondents expressed concerns about schools not being included in the CAZ. - The CAZ should include the areas around Bathwick St Mary's, King Edward's, Beechen Cliff, Hayesfield, The Paragon, Royal High School and Oldfield Park Infant's School. - There was serious concern that the CAZ may increase traffic past schools by diverting traffic into areas around schools. - <u>Bathwick St. Mary's School</u> specifically requested to be included in the zone.
<p><i>Wider area</i></p>	<ul style="list-style-type: none"> - Some respondents felt that the zone should cover the whole city and extend out as far as the Park and Ride sites. - <u>Bath Preservation Trust</u> and <u>Bathampton Parish Council</u> called for consideration of the CAZ boundary to extent to the WHS boundary. - Some respondents suggested that routes further out from the centre should somehow be included, to prevent rat runs. North Claverton and Bradford Road were mentioned.

8.3.4 Requests for the exclusion of streets from the CAZ from individuals/groups

Table 7-2 lists the roads that respondents would like to see **EXCLUDED** from the CAZ or routes where they expressed concern about their inclusion (Table 7-2). Please note therefore that not all comments reported here were outright requests for exclusion. These comments are reported together to highlight the range of issues that were highlighted in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. That is, whilst, in certain locations some respondents expressed concern that their area was included within the CAZ/requested for their area to be excluded, other groups felt that the better solution was for that area/additional streets to be included/for the zone to be made larger. The opposing views are set out in the previous Section.

Table 8-2: Requests for exclusion of streets/areas in the CAZ

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<i>A4 London Road/A36 Cleveland Place Junction</i>	<p>Respondents identified the junction of London Road and Cleveland Place as an area they would like to see removed from the zone, or an area that they felt caused issues through its inclusion. The reasons for this view included the following:</p> <ul style="list-style-type: none"> - To allow traffic to get around/out of the city, to the motorway (M4) and to the A36 Warminster Road or the A4/A46. Respondents expressed concern about the inclusion of the A4, the A36 and the A367 – all the through routes – given that there is no bypass/alternative route. - To allow traffic to get from the east of Bath to the University and other destinations such as the fire and ambulance station, as well as schools south of Bath and the hospital. - This is one of very few river crossings and there are no alternative routes (other than the Batheaston toll bridge). - Inclusion of this junction will encourage more traffic to use routes through Batheaston and Bathampton, including the toll bridge, and this will have knock on effects for residents in this area. - Traffic would seek alternative unsuitable routes through local towns, for example; Bradford on Avon, Winsley and Limpley Stoke or via unclassified roads. - It would be unsafe if drivers decided to make a last-minute change of route to avoid the CAZ. There is no space to turn. - Some drivers would incur the charge just for using this corner. Respondents felt strongly that drivers using this junction to get out of the city should not be penalised and emphasised that many vehicles using this junction are not entering the city centre. - Concern that the inclusion of this junction is generated by a desire to make money/collect additional charges. - Respondents felt that the above issues could be addressed by a small change to the boundary at the junction. - Without an A46/A36 bypass this corner is unavoidable for many trips. - Concern that including this corner restricts access to Morrison's. - This junction is on an important route to the hospital, especially from Wiltshire. - <u>Avon and Wiltshire Partnership NHS Trust, Hilperton Parish Council, Heywood Parish Council, Winsley and Westwood Parish Council and Westbury Town Council</u> all support exclusion of this junction.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<p><i>East of A36 Pulteney Road</i></p> <ul style="list-style-type: none"> - <i>Lime Grove/Lime Grove Gardens</i> - <i>Pulteney Gardens</i> - <i>Pulteney Avenue</i> - <i>Horseshoe Walk</i> 	<ul style="list-style-type: none"> - Residents of these streets with non-compliant vehicles would need to pay the charge even if heading out of the city – they would pass through a very small section of the zone. These streets do not need to be in the zone. - Lime Grove Gardens is fully within the zone but is a dead end. - Boundary seems illogical to residents. - Concern about impact of cameras and signage on canal bridge on Pulteney Gardens.
<p><i>Widcombe:</i></p> <ul style="list-style-type: none"> - <i>Widcombe Hill</i> - <i>Prior Park Road</i> - <i>Claverton Street</i> - <i>Lyncombe Hill</i> 	<ul style="list-style-type: none"> - Widcombe is not part of the city centre. - Residents need to be able to access the shops in Widcombe and including the Widcombe loop affects this. - The current boundary would affect access to Armes Court. - The current boundary would affect access to Widcombe Infant School. - Non-compliant vehicles turning from Widcombe Hill into Prior Park Road would incur a charge for clipping the edge of the zone. - As proposed, the CAZ will mean that Church Street/The Tynning will be used as a rat run. - The current boundary will encourage rat running on Greenway Lane and lead to worsening of parking problems on Lyncombe Vale which does not have residents parking. This will cause problems near to The Paragon School. - Widcombe Baptist Church should be outside of the zone to allow access for the congregation. - The boundary near the A36 should allow pick up/set down close to Halfpenny Bridge, by allowing access around the Widcombe loop. - <u>Foxhill Residents Association</u> requested the removal of the Widcombe loop.
<p><i>A36 section including:</i></p> <ul style="list-style-type: none"> - <i>Lower Bristol Road</i> - <i>Claverton Street</i> - <i>Rossiter Road</i> - <i>Pulteney Road</i> 	<ul style="list-style-type: none"> - Respondents felt that the A36 should not be included in the zone because it is a main road, it is the main route around Bath, main east/west route, a key route to the motorway and there is no alternative route. - There needs to be a way for traffic to get around the perimeter of the city. There should be at least one through route. - There were various suggestions about where the zone should end. Typically, respondents suggested that this route should be excluded up to the Churchill Bridge roundabout/the A36/A367 junction or from Westmoreland Road and Midland Bridge. - <u>The Road Haulage Association</u> expressed a strong view that the A36 should be excluded from the zone. - <u>Trowbridge Town Council</u> and others requested for the A36 to be excluded from the CAZ. - <u>The British and Vehicle Licensing Association</u> noted concern about inclusion of A36, due to the impact on freight movement. - HGVs need to use this route and there are not suitable alternatives for HGVs. - The A36 is not part of the city centre (respondents felt the CAZ should only cover the city centre).

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - No need to include routes south of the river/the CAZ should only cover the area of the city to the north of the river, they also argued that the river would be a more logical southern boundary, Heywood Parish Council support this. - This route is important to access supermarkets and retail outlets (Sainsburys, Homebase and Lidl) and petrol stations (see below). - Including the A36 will encourage more traffic to rat run through residential areas, particularly Oldfield Park, Combe Down, Claverton Down and Twerton and between Newton St Loe and Hinton Charterhouse and Bradford on Avon. Particular concern about HGVs taking alternative, inappropriate routes. - Including this route will affect many people's frequent journeys, for example to work, to the motorway and to the RUH. It is an important route for commuters. - Many of those who requested the exclusion of the A36 specifically highlighted the need to exclude the junction of the A36 and the A4 London Road (see below). - It was noted that the A36 is sometimes used as a diversion route and questions asked about how this would work if it were in the CAZ. - Churchill Bridge and Midland Bridge should not be included. - Including the A36 affects lower income families in Twerton, Newbridge and Weston. - There was concern that inclusion of the A36 was driven by a desire to raise additional revenue. - As well as asking for the part of the A36 currently included in the zone to be excluded, respondents asked that the section currently not included (Bathwick Street) should not be included, as this is part of the through route. - Businesses located off the Lower Bristol Road, such as in the Midland Bridge area, should not be in the zone. - The A36 is an important route to the hospital from the east/south of Bath. - Foxhill Residents Association requested that Rossiter Road and the Widcombe area be removed from the CAZ.
A367 Wells Road and Churchill Gyratory (Junction with A36)	<ul style="list-style-type: none"> - Respondents who requested for the A36/Lower Bristol Road to be excluded typically also mentioned Wells Road. The A367 is an arterial route and should not be included as it is an important route out of/around Bath. - Without a bypass, for many trips there are no appropriate alternative routes. - Respondents felt that the zone extends too far south and need not include Wells Road. - The A367 is an important part of the route for traffic from the south of Bath accessing the motorway. - There was concern that including Wells Road, as shown, would lead to rat running through Oldfield Park, Combe Down, Lyncombe Hill and surrounding villages. - Concern that including Wellsway will increase traffic on Junction Road and Lower Oldfield Park. - Wells Road is a main route to the railway station and the RUH from the south of Bath. - This affects access to schools such as Hayesfield School, Beechen Cliff, Ralph Allen and local services in Oldfield Park. - Hayesfield Park should be excluded because this disadvantages residents. - This will affect businesses on the trading estate.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Including this area would affect the local shopping areas. - This affects access to the Park and Ride at Odd Down. - It was noted that the A367 is used as a diversion route and that it would be unfair to charge people under these circumstances. - Including the junction of Upper Oldfield Park and Wellsway was considered illogical as this would force traffic down the B3111, which is unsuitable for increased traffic. If this junction were outside the CAZ it would enable access from the south to the doctor's surgery on Upper Oldfield Park. - Inclusion of the section between Upper Oldfield Park and Oldfield Road affects residents but does not seem to add much benefit. - Upper Oldfield Park Residents Association specifically requested that the boundary of the CAZ remain at the intersection of Wells Road and Oldfield Road. - It was suggested that it should be possible for vehicles to cross Wellsway without charge.
<p><i>Route to allow access to Sainsburys and the petrol station, Green Park, Homebase etc</i></p> <ul style="list-style-type: none"> - A36/Lower Bristol Road - Pines Way - Bath Riverside Development - Stothert Avenue - Midland Bridge 	<ul style="list-style-type: none"> - Respondents felt residents ought to be able to access these facilities without entering the CAZ, especially given that accessing Morrison's on the east of Bath would require driving through the zone. - Excluding the Pines Way Gyratory here would give an opportunity for drivers who do not want to enter the CAZ to turn around. - Midland Bridge, allowing the gyratory to be outside, would be a more appropriate boundary. - If the Sainsbury's is within the zone it will discourage people from shopping locally and result in people shopping at alternative locations, such as Keynsham. - Preventing access to the petrol station will result in people driving further to fill up. Sainsbury's also offers a pharmacy which is open late. - It would affect the farmers market. - It will mean that residents of Western Riverside Development; (Stothert Avenue and streets off, including Albert Crescent, Percy Terrace and Victoria Bridge Road) have to enter the zone to exit their street as the other end of Stothert Avenue is to become a bus gate. If Pines Way is included in the zone, vehicles need to be allowed to use the Destructor Bridge. - Weekly shopping and DIY materials cannot be carried by bus. - Inclusion of this area affects access to the industrial estate. - Inclusion of Pines Way affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park.
<p><i>Brougham Hayes Road/Junction with A36 Lower Bristol Road</i></p>	<ul style="list-style-type: none"> - Concern that traffic turning left from Brougham Hayes onto the Lower Bristol Road westbound (and vice versa) will incur a charge for a journey that is not going into the city centre. This route is used to access the RUH and destinations towards Bristol and by residents from Westmoreland. Concern that many drivers will incur a charge for clipping the very edge of the CAZ. - Concern that including this junction will lead to rat running through Oldfield Park, Twerton and on Dartmouth Avenue, West Avenue, Moorland Road, Lyndhurst Road, Millmead Road, Ringwood Road, Brook Road, Bellotts Road, past Oldfield Park Junior School and across Windsor Bridge. - School buses use this junction.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Inclusion of this junction affects access to Hayesfield School and access to the hospital. Hayesfield School specifically asked for the junction to be removed from the zone. - Inclusion of this junction affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park - If this junction is included it impacts residents of Oldfield Park who need to access the city or the motorway. - There was concern that this junction had been included to raise revenue. - Hilperton Parish Council requested an exclusion of this junction to allow access from the south of Bath to RUH. - It should be noted that Upper Oldfield Park Residents Association specifically commented that this junction should remain inside the CAZ.
<i>South of A36</i>	<ul style="list-style-type: none"> - Westmoreland Street, off the A36, is a dead end but included on the edge of the zone – there is no alternative but to enter the zone. - There is no need for the zone to cover the houses to the south of the Lower Bristol Road.
<i>A4 Upper Bristol Road</i>	<ul style="list-style-type: none"> - Upper Bristol Road should be excluded as it is a key through route. It is important to allow people to move across the city. - Argos should not be included.
<i>Victoria Park/Weston area to include:</i> <ul style="list-style-type: none"> - <i>Weston Road</i> - <i>Marlborough Road</i> - <i>Cavendish Road</i> - <i>Cranhill Road</i> - <i>Julian Road</i> - <i>Park Lane</i> 	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access Victoria Park, a public amenity, without entering the zone and felt that if it were included they and their families would use these facilities less and this would lead to people undertaking less exercise. - Including Victoria Park hinders access to the golf course. - Families ought to be able to access, at least, the western part of Victoria Park. - Concerns that including the park will affect tourism and is included to make money from visitors. - It was noted that the park is used as a Park and Walk location. - This area, extending out to Julian Road and Weston Road and areas to the north, are lightly trafficked and emissions here are low and therefore should not be included. These are also important routes out of the city. - Including the areas north of Weston Road is likely to lead to congestion and parking problems in Sion Hill and Lansdown. - Inclusion of this area prevents traffic from going north-south through the city. - Some respondents felt that drawing the west boundary to Marlborough Lane/Cavendish Road /Weston Road would be preferable. - Inclusion of Cavendish Road was considered unnecessary by some (although note that the Cavendish Road Society stated they were pleased to see this road included in the zone). - Excluding Marlborough Road would allow access to Charlotte Street car park without entering the zone. - Concern that Weston Park will see increased pressure for parking. - Concern that routes in this area (Weston Lane, Julian Road and Marlborough Road) are used to access the hospital. - Social housing on Julian Road would be negatively affected – this road should not be included. - Respondents were keen to see Park Lane outside the CAZ (some respondents were not clear that it is not included in the boundary proposed).

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Respondents felt it was not necessary to go as far out as Victoria Park or Weston. - Cranhill Road and Cranhill Nursing Home should be outside of the CAZ (detailed boundary change). Cranhill Road is a small cul-de-sac of 8 homes.
<p><i>Lansdown/Walcot</i></p> <ul style="list-style-type: none"> - <i>St James Park</i> - <i>Lansdown Crescent</i> - <i>Lansdown Place East</i> - <i>Upper Lansdown Mews</i> - <i>Richmond Road</i> - <i>Lansdown Road</i> - <i>Lansdown Grove</i> - <i>St Stephen's Road</i> - <i>Mount Road</i> - <i>St Stephen's Close</i> 	<ul style="list-style-type: none"> - The zone should be kept more central and not extend up Lansdown Road. It should stop before St. Stephen's Church. - The zone should not include St. James's Park as this area does not have existing issues. - St. Stephen's Close should not be included as non-compliant vehicles turning up the hill and out of the city will incur a charge for clipping the edge of the zone. - Including the corner of Lansdown Road and Richmond Road will encourage traffic to rat run through Charlcombe Lane, which is narrow and unsuited to additional traffic. The boundary should be moved slightly south to allow turning from Lansdown Road into Richmond Road. - Lansdown Grove and St. Stephen's Road area should not be included as traffic heading north would clip the edge of the zone. - St Stephen's Road does not need to be included, with a sharp hair pin bend it is very unlikely to become a rat run. The CAZ should start below the St Stephen's Road junction. Concern that the boundary as drawn includes the private access road to a single dwelling and the zone could stop further down the road, although the property owner generally supports St Stephen's Road being in the zone to prevent rat running. - Mount Road residential area does not need to be included because it is mainly older people, few cars and very low mileage users. - This area is not considered to be polluted.
<p><i>Camden area</i></p> <ul style="list-style-type: none"> - <i>Camden Crescent/Road</i> - <i>Belgrave Crescent</i> 	<ul style="list-style-type: none"> - Concern expressed that inclusion of Camden Road and Camden Crescent, as well as Weston Road prevents routes across the city. - One respondent noted that Belgrave Crescent, which is currently on the edge of the zone, should not be included in any boundary change/extension. This would not be necessary to tackle emissions.
<p><i>Central area</i></p> <ul style="list-style-type: none"> - <i>Car Parks</i> 	<ul style="list-style-type: none"> - Residents expressed concern about the inclusion of various central streets because of the impact this would have on their own personal journeys, including George Street, High Street, Dorchester Street, James Street West, Kingsmead, Morford Street, Norfolk Crescent, Northampton Street, Queen Square, Royal Crescent, The Paragon and the area around The Forum, - Car parks, including Avon Street, Southgate and Charlotte Street should be excluded.
<p><i>Pick up/drop off areas</i></p>	<ul style="list-style-type: none"> - Respondents commented that the area around Halfpenny Bridge is a useful place to set down passengers and felt that a convenient drop off location should be accessible without entering the CAZ.

8.3.5 Concern about journeys that would be impacted by the CAZ from individuals/groups

Respondents expressed concern that the proposed CAZ would prevent them making or impact specific journeys or accessing particular destinations and called for routes to these destinations to be excluded from the CAZ. Comments received are shown in Table 7-3 and included:

Table 8-3: Concerns about journeys into or through the CAZ.

Destination or journey identified	Detail given/comments made
<i>East west and north south routes/routes across the city</i>	<ul style="list-style-type: none"> - Respondents felt that the boundary should acknowledge the need for routes to go east-west and north-south across the city, including to the motorway, particularly as there are no alternative routes. Generally, respondents felt that there should be routes around the CAZ. - Inclusion of the A4, A36 and A367 make it difficult to undertake journeys across and around Bath without entering the CAZ. It was particularly noted that traffic that needs to go between the A36 and the A46 has little option but to route through the CAZ. - Many trips are not going to the city centre – traffic needs to be allowed to go around Bath. - There was concern that inclusion of the main routes penalises residents living in Bath but working elsewhere i.e. it impacts on their journeys to leave the city. - Concern that this will have impacts on surrounding areas, such as Bradford on Avon. - There was concern that the boundary includes too many of the practical routes that residents need to use to move around the City.
<i>Access to the RUH</i>	<ul style="list-style-type: none"> - There was particular concern that the main routes to the RUH from Wiltshire/east of Bath are included within the proposed CAZ boundary and also the route to the University (specifically the London Road/Cleveland Place junction).
<i>River crossings</i>	<ul style="list-style-type: none"> - Respondents felt the CAZ should not cover all the river crossings.
<i>Access to the M4</i>	<ul style="list-style-type: none"> - Many trips to the motorway, for example from the south of Bath, would enter the CAZ even though they are heading out of the city. Respondents felt that the CAZ should not impact on access to the motorway. - Radstock Town Council and Midsomer Norton Town Council were concerned about access from the south of Bath to the M4. - There were concerns that routes taken to avoid the CAZ would impact on other areas, in particular Wiltshire towns and villages.
<i>Car Parks</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access main car parks (particularly Charlotte Street and Avon Street) without entering the zone or that there should be more parking on the edge of the zone. - There was concern that including the car parks would mean that the Park and Ride would become overloaded.
<i>Supermarkets</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access supermarkets without entering the zone. - There was particular concern that Sainsbury's, Homebase and Waitrose are included within the zone, but respondents also noted that accessing Morrison's would be impacted for anyone approaching from the city side.
<i>Petrol stations</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access petrol stations without entering the zone, and that the zone prevents access for some to the main Bath petrol stations.
<i>Bus and rail station</i>	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access/drop off at these public transport hubs without entering the zone. Respondents noted that the Park and Ride is not a viable option for rail journeys that return late at night.

Destination or journey identified	Detail given/comments made
<i>Public buildings/services</i>	- Respondents commented that routes to public buildings, shops and services should not be included in the CAZ, with particular mention of the sports centre/ The Rec, college, schools, parks, council buildings, University, recycling centre, hospitals, doctors' surgeries, Royal Mail sorting office and places of worship.

8.3.6 Alternative boundary solutions identified from individuals/groups

Within the responses a number of suggestions for alternative ways of determining the CAZ boundary were suggested. These included:

- Include only main roads and exclude all local roads. This would allow residents to travel within their immediate areas without incurring a charge for non-compliant vehicles.
- Charge people to enter the zone via entry points located further out of the City. For example, at the bridges or major junctions.
- Initially allow trips within the zone to be undertaken without a potential charge/ sunset period.
- The CAZ should be considered to line up with Residents Parking Zones (RPZs).
- The CAZ boundary should align with the World Heritage Site boundary.

8.4 Comments relating to business in Bath

8.4.1 Quantitative feedback from business respondents on the effectiveness of the charges

Note: See Appendix C for the full reporting of data reported in Section 8.4.1.

Question 2 of the business questionnaire asked 'To what extent do you agree or disagree with the following statement: "The proposed charges will be effective in encouraging businesses and organisations to change to lower emissions vehicles or change the way they operate in the city"

It should be noted, as with the questionnaire for individuals and groups, many business respondents misinterpreted this question. Analysis of their responses to Question 3 suggested they answered Question 2 to reflect their views of the proposed charges/level of the charge as opposed to their views on how **effective** the charge would be.

Of the 550 business respondents that answered Question 2:

- 43% disagreed strongly that proposed charges would be effective in encouraging businesses and organisations to change to lower emission vehicles or the way they operate in the city. A further 20% disagreed.
- 14% agreed the proposed charges would be effective, with a further 9% agreed strongly.
- 11% neither agreed nor disagreed and 3% did not know.

The written comments show a wide range of reasons for these views and these are set out in Section 8.4.2.

8.4.1.1 Further Analysis

Cross tabulation of the businesses responses to Question 2 with data from Questions 4, 5 and 15 to 17 was used to determine if respondent's views on the effectiveness of the proposed charges differ depending on location, frequency of travel within the proposed zone, and the percentage of their fleet they anticipate being compliant in the next two years.

Effectiveness of the proposed charges by business location

Figure 8-1 shows that business respondents located closest to the proposed zone agree that the proposed charges will be effective more than those located further away from the zone. The percentage of business respondents who disagreed with the effectiveness of the proposed charges was greater in all locations.

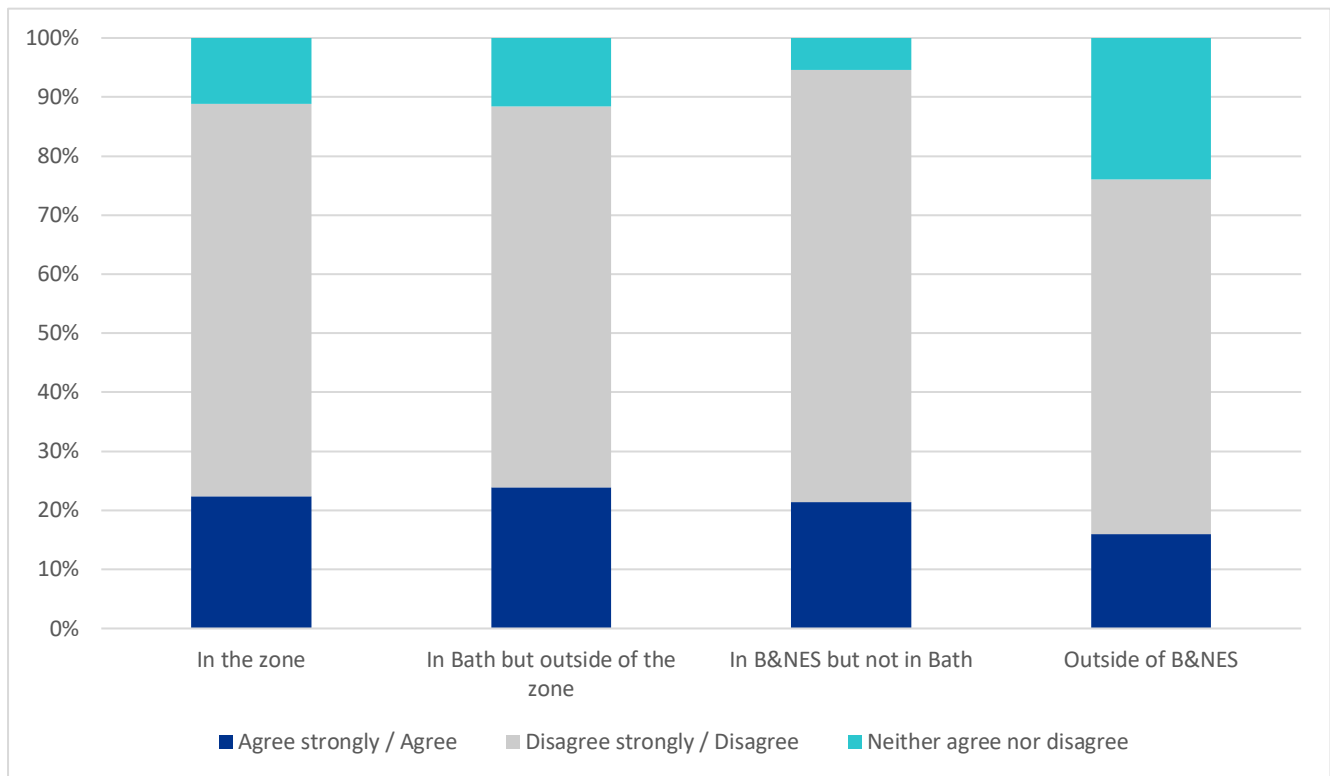


Figure 8-1: Cross tabulation of Questions 2 and 22 – view of effectiveness of the proposed charge against business location

Effectiveness of the proposed charges by frequency of travel into the proposed zone

Figure 8-2 shows that business respondents that don't drive in Bath show the least support for the effectiveness of the proposed charge. This could be because these business respondents were concerned about the impact to their deliveries and clients.

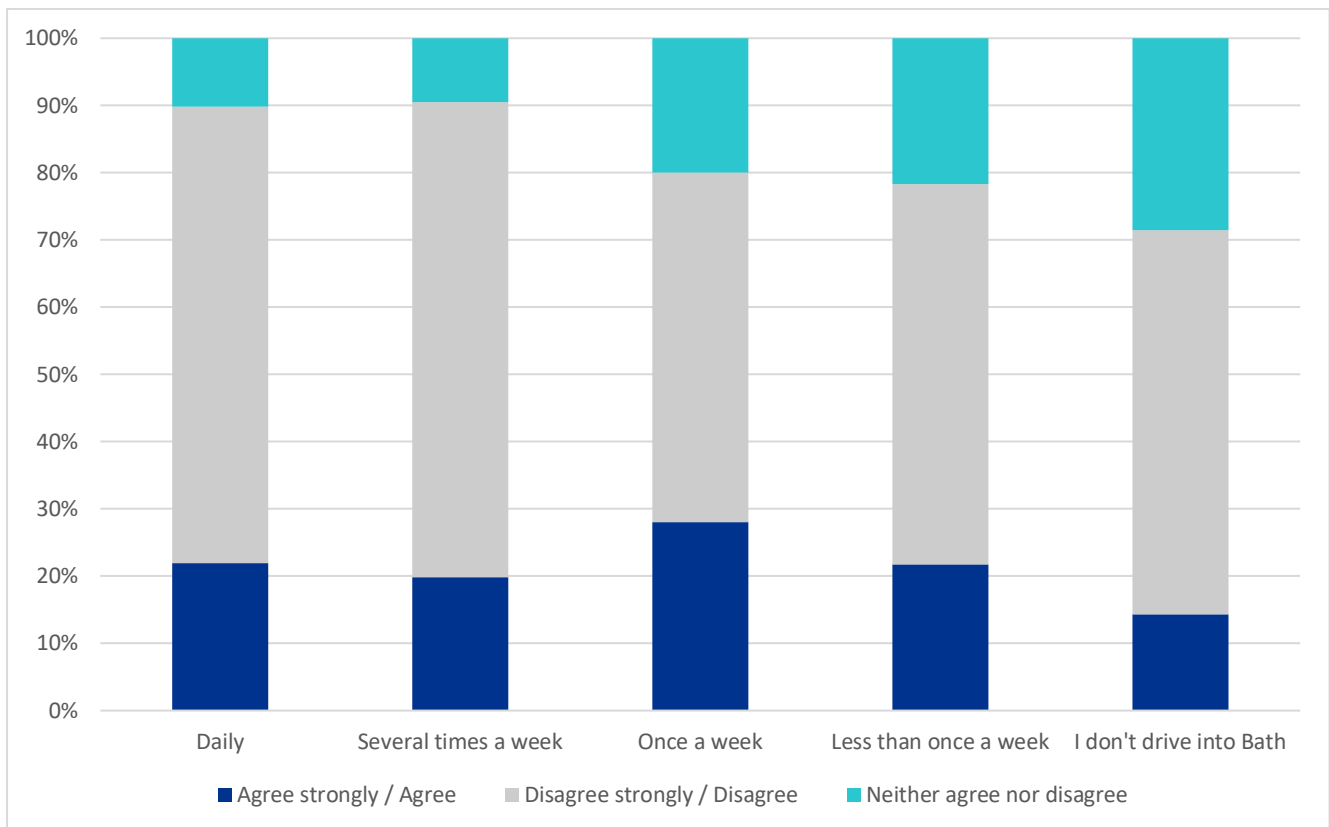


Figure 8-2: Cross Tabulation of Questions 2 and 21 – view of effectiveness of the proposed charge, against frequency of travel into the proposed zone

8.4.2 Qualitative feedback on the effectiveness of the charges relating to business in Bath

Question 3 of the business questionnaire asked respondents to explain their answer or suggest an alternative charge. A wide range of free text comments were made and are summarised in the following Section. These are considered in the context of the response given to Question 2 in order to provide context and reasoning behind the opinion stated in Question 2.

In the letters and emails received, a number of businesses and business organisations commented more generally on the impact of the proposed charges on them. For example, **Bath Chamber of Commerce** expressed concern that a Class D CAZ would have difficult consequences for businesses and expressed particular concern about the potential increased cost of deliveries. A **Coach tour company** also commented that the increased cost may discourage some tourist coaches from coming into Bath. In terms of impact on HGVS the **Road Haulage Association** expressed concern about the impact on hauliers, particularly small hauliers. Similarly, the **Freight Transport Association** outlined issues of cost, especially for operators who have recently purchased newer diesel vehicles and noted that retrofit options are not possible for HGVs. **The British Vehicle Licensing Agency** identified concerns about the cost to small businesses.

8.4.2.1 Reasons why respondents agreed the proposed CAZ charges would be effective, relating to business in Bath

Respondents that stated in Question 2 that they 'agreed' or 'strongly agreed' that the proposed charge would be sufficient to encourage a change in travel habits or vehicle choice, provided a variety of reasons, explained in Question 3. These are summarised in Table 8-4.

Table 8-4: Reasons businesses thought the CAZ charge would be effective

Comment	Reasons/detail given by business respondents
<i>The CAZ charge will be effective / support the charge level</i>	<ul style="list-style-type: none"> - Financial disincentives are the most effective way to bring the air quality improvements needed to avoid a public health crisis. - The charges needs to be significant to encourage behaviour change. - Some business respondents suggested the charge would encourage them to change the way they operate in the city. - Some business respondents mentioned that they have already purchased electric vehicles in support of the Scheme. - There was some support for the proposed charges subject to appropriate support and incentives. - There needs to be fewer vehicles in the centre of Bath
<i>Charges could be higher</i>	<ul style="list-style-type: none"> - Concern that charges would not seem high enough for some businesses specifically taxis, LGVs, HGVs, buses and coaches. - There was some uncertainty whether a once daily £9 charge would be enough to deter delivery companies with non-compliant vehicles making multiple trips per day into and within the zone.

8.4.2.2 Concerns relating to business in Bath, expressed by respondents who agreed the proposed CAZ charges would be effective

Despite stating that they agreed the proposed charges would encourage behavioural change, some business respondents expressed a range of concerns. These are detailed in Table 8-5:

Table 8-5: Reasons businesses were concerned about the CAZ charge

Comment	Detail/reason given
<i>Relocation of visitors and businesses</i>	<ul style="list-style-type: none"> - Concern that charges would deter shoppers and visitors from the city and have a negative impact on Bath's economy. It was felt that shoppers and visitors would go elsewhere because: <ul style="list-style-type: none"> - Some businesses will pay the charges and increase costs to consumers. - They are deterred from driving in because they won't want to pay the charges. - Some business respondents commented that they believed businesses and organisations will move elsewhere.
<i>Disproportionate impacts</i>	<ul style="list-style-type: none"> - Smaller businesses would be disproportionately impacted. It is noted that some would consider relocation due to the economic viability of continued operation. - Concern that some taxis, LGV drivers and HGV drivers would pass costs to consumers and would continue to operate as normal. In particular there was concern about the disproportionate impact this would have on the competitiveness of independent traders compared with larger firms.
<i>Impact on employees</i>	<ul style="list-style-type: none"> - Concerns about the impacts on employees. Specifically, that they would be unable to afford vehicle changes and will seek employment elsewhere.

Comment	Detail/reason given
<i>Financial impacts</i>	<ul style="list-style-type: none"> - Some organisations would be unable to afford to switch to compliant vehicles. - Concern about the financial impact to businesses in Bath particularly when coupled with increased parking charges.
<i>Limitations to changing behaviour</i>	<ul style="list-style-type: none"> - There are few viable alternatives for some businesses, specifically delivery vehicles/LGVs. - Disbelief that businesses will switch to lower emission vehicles because there are few low-cost options for vehicles, other than for car users. - Timescales are tight, and businesses need more time to alter behaviour, specifically a period of 4-5 years was suggested.
<i>Scheme operation</i>	<ul style="list-style-type: none"> - There is a lack of infrastructure for electric vehicles currently. - There was some misunderstanding of charge operation i.e. that vehicles, especially delivery drivers, would be charged more than once in a day.

8.4.2.3 Reasons why respondents disagreed the proposed CAZ charges would be effective relating to business in Bath

Business respondents that stated in Question 2 that they 'disagreed' or 'strongly disagreed' that the proposed charges would be sufficient to encourage a change in travel habits or vehicle choice provided a variety of reasons, explained in their answers to Question 3. These are summarised in Table 8-6.

Table 8-6: Reasons businesses thought the CAZ charge would be ineffective

Comment	Reasons/detail given by business respondents
<i>Concern about charging vehicles</i>	<ul style="list-style-type: none"> - Concern that charging forces business owners to change not encourages. - Concern that the minimum requirements would change in the future. - There are no efficient or alternative through traffic solutions.
<i>The CAZ charges are too high</i>	<ul style="list-style-type: none"> - There should be no charges. - Charges will particularly impact lower income workers and smaller businesses/sole traders/the self-employed unable to afford charges or vehicle switches or impacted because of increased costs from suppliers. "Tax on the poor". - The change to lower emission vehicles is happening naturally anyway, unsure of the need to put additional pressure on businesses. - The proposed charges would force businesses to close. - Businesses requiring HGVs or diesel vans will move out of/not operate in Bath.
<i>General concerns about the impact of charging on businesses</i>	<ul style="list-style-type: none"> - Concern the Scheme would drive employees, small businesses, visitors and customers elsewhere. - Some business respondents were concerned that the Scheme would increase the costs of their deliveries. - Concern that some businesses will be able to absorb the costs of the charge and others won't. There was concern that this would result in a loss of business for those who are not in a financial position to pay the charges or to upgrade their vehicles and will have to pass costs onto consumers/customers. - Concern about impact on future business growth, particularly in relation to lower footfall in the city. - There was concern about the financial implications of the proposed charges to businesses when coupled with the high business rates. - Concern about the impact on tourism. - Contractors would be discouraged from coming to the city. - Impact on care workers, charities, SMEs, independent retailers, care workers, market traders, self-employed, tradesmen, suppliers.

Comment	Reasons/detail given by business respondents
	<ul style="list-style-type: none"> - Concerned about the proposed charges deterring non-B&NES residents from coming to Bath. - Some business respondents felt that the proposed Scheme discriminates against those businesses unable to afford to replace vehicles. - The charges would make it difficult for businesses to retain and support staff. There was concern that people will look for jobs elsewhere. - For HGVs there is little choice, vehicles are still diesel based, therefore it is very difficult to change to a compliant vehicle. Concern that HGVs will continue to use the route through Bath including Cleveland Bridge, despite hopes that this will be prevented. - There are no alternative routes or modes suitable for HGVs. - A £9 charge for a small business is considerable. - The charges would affect small businesses with vans. - For some commercial users who need to access the city centre, there are no feasible alternatives (i.e. tradespeople carrying tools).
<i>Charges will not result in behaviour change</i>	<ul style="list-style-type: none"> - Some business respondents thought that they/their employees will look for alternative routes to avoid the CAZ. - Paying the charge is cheaper for businesses than upgrading vehicles. - Businesses will pass costs onto customers rather than make changes themselves. - Businesses will push costs onto consumers where possible and continue to drive vehicles as normal. - Some business respondents felt that the proposed charges were not high enough to result in a change of behaviour. - Some business respondents felt that the benefits of improved air quality to the environment, local community and businesses was not realised by much of the business community in Bath and that this would limit the level of behaviour change. - There are not enough incentives to change behaviour. The Scheme is a "hammer not a carrot". - It was noted that commercial vehicles may make multiple trips in one day (therefore may notice the charge less than private drivers making a single trip each day) - There is a lack of alternative vehicles for LGV drivers that meet the emission standards and are suited to business needs therefore there was concern that this would result in continued used of polluting vehicles. - The proposed Scheme does not provide enough time to enable businesses to change their vehicle/fleet, specifically for those with larger fleets. - Some businesses and individuals would be unable to afford to change to compliant vehicles and this was thought to decrease the likelihood of achieving the necessary air quality improvements. - Some businesses will just absorb costs until their normal vehicle replacement cycle comes around and continue driving non-compliant vehicles until this time.

8.4.2.4 Reasons why business respondents were unsure about the effectiveness of the proposed CAZ charges

Those respondents who either did not answer Q2 or stated 'don't know' or 'neither agree nor disagree' that the CAZ charges would encourage behaviour change echoed many of the comments in the tables above in their response to Q3. Comments included:

- Concerns the Scheme is a revenue raising exercise.
- The charges are too high or unaffordable to many and businesses may be unable to afford to change their vehicles.
- Especially concerned about the impact to SMEs. Would be difficult for small businesses /sole traders/market traders to upgrade vehicles.
- Would like to know if charges will change in the future.
- Concerns that people will stop using the city centre and choose to shop and spend leisure time elsewhere.
- Alternative modes of transport are not good enough.
- People will be encouraged to find alternative routes, many of which may be inappropriate.

8.4.2.5 Alternative charging approaches suggested by business respondents (for a scaled back Scheme)

Table 8-7 summarises the suggestions made where business respondents felt that the proposed Scheme should be scaled back/made more lenient. These suggestions are taken from all responses (regardless of whether the business respondent agreed/disagreed or had no view on the statement in the question). It should be noted that respondents also made the opposite view, stating numerous ways in which they felt the Scheme could be expanded/made stricter (see Section 8.4.2.6).

Table 8-7: Suggestions for a scaled back Scheme by businesses

Type of lower/more restrictive charge suggested	Reasons/detail given by respondents
<i>No charge at all</i>	- There should be no charges.
<i>Class C CAZ</i>	- Make it a Class C CAZ.
<i>Change the minimum standards/exemptions</i>	- Some respondents were unsure why petrol vehicles are charged.
<i>Charge based on emissions</i>	<ul style="list-style-type: none"> - Sliding scale of charges for the various Euro standards. - Charges should be based on the true emission value for vehicles as recorded as part of MoT testing – this is not the case under the proposed Scheme. - Differentiate charge level based on engine size. A Euro 5 1.6 diesel should not pay the same as a Euro 4 3.0 diesel.
<i>Change the charging period</i>	<ul style="list-style-type: none"> - Do not charge overnight. Suggestions included charging from 7-7; 6-6; 8-8, 8-7. - Phase charges in gradually/Phase in the CAZ. - Charges should be restricted to peak times or hourly. - Charges should not apply 24 hrs a day because public transport is not available 24 hrs a day. - There should be a 6pm cultural life consideration. - Rolling 24hr period.

Type of lower/more restrictive charge suggested	Reasons/detail given by respondents
<i>Lower charges/concessions</i>	<ul style="list-style-type: none"> - Reduce the charges for delivery vehicles or allow them into the zone at particular times. - Trade vehicles should not pay charges. - Charges are too high for buses, coaches and HGVs. Suggestions of £30 - £50 instead of £100 - Concessions needed, particularly to reflect the difficulty and cost of replacing trade vehicles and HGVs.
<i>Congestion charge</i>	<ul style="list-style-type: none"> - Charge all vehicles a lower amount, Suggestions included £3 and £5 a day
<i>Alternatives</i>	<ul style="list-style-type: none"> - Charge differently on outer roads to enable people to travel around the centre. Higher charges in city centre, lower charges on Old Wells Road, Lower Bristol Road, London Road to allow traffic that has no option but to go on these routes to get around Bath - Ban pre-Euro 4 from 2020, Euro 4 from 2022 and Euro 5 from 2024 - Restrict HGV and LGV access to the city to within certain times - Suggest phasing in of a diesel tax;

8.4.2.6 Alternative charging approaches suggested by business respondents (for a stricter Scheme)

Table 8-8 summarises the suggestions that were made by business respondents for the proposed Scheme to be made more stringent or wider reaching. These suggestions are taken from all responses (regardless of whether the respondent agreed/disagreed or had no view on the statement in the question):

Table 8-8: Suggestions for a scaled-up Scheme by businesses

Type of higher/more expanded charge suggested	Reasons/detail given by respondents
<i>Charge all vehicles</i>	<ul style="list-style-type: none"> - All vehicles should be charged. - All vehicles should be charged or there should be a congestion charge.
<i>Charge more vehicle types</i>	<ul style="list-style-type: none"> - Charge all diesel engines. - Charge students. - Euro 6 diesel should be charged in time.
<i>Higher charges</i>	<ul style="list-style-type: none"> - Charges should be higher for commercial vehicles. - All diesel vehicles should be charged. - Higher charge for taxis and LGVs because they drive around the city all day. A higher charge would provide more of an incentive to switch to lower emission vehicles. - Levels of £100, for LGVs and Taxis and £200 for buses, coaches and HGVs were suggested. To prevent businesses transferring costs to customers. - £10 would be a better psychological barrier for cars.
<i>Other options</i>	<ul style="list-style-type: none"> - All transport should be banned except taxis and buses.

8.4.2.7 Other comments

Further comments regarding charging from business respondents included:

- The standards used should be clarified as some non-compliant cars are currently seen as low emission.
- Residents should pay higher charges as they have the best access to public transport, alternative transport and locality benefits.
- Implementation time should be longer to give businesses more time to become compliant.
- Some business respondents noted that they already pay to use the road network via car tax and felt they should not be subjected to further charges.

8.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Restate the previously stated reasons why a congestion charge is not appropriate in this context.
- Revisit previous work on a Class C CAZ and, where necessary, undertake further analysis to establish if a Class C CAZ could be feasible in terms of addressing the required air quality targets.
- Consider, in the case of a Class D CAZ, what can be further offered to support people to make positive changes, either to change their vehicle or travel by alternative modes, for example by providing further details on the financial support schemes available or the improvements being sought to public transport.
- Revisit/further consider, in the case of a Class D CAZ, whether it is feasible to offer any further alterations to address concerns about the level of charge including charging structures, minimum standards, concessions, discounts, and hours of operation.

9. Comments Relating to Concessions and Exemptions

9.1 Overview

This Chapter reports:

- Comments made within Question 1 of the individuals and business questionnaires, which asked '*Are there any changes to the boundary of the proposed zone that you think we should consider?*'. Note that in both questionnaires the question on boundary was free text only, therefore there is no quantitative data for this topic;
- Comments made within the responses to other questions but that were identified as being specifically related to the proposed boundary; and
- Comments on the boundary sent in via letter or email both from individuals and businesses (although fuller details of comments submitted by letter are included in Chapter 15)

Within this Chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, it is noted only once. The ordering of comments does not imply any order, priority or weighting.

This Chapter first reports the feedback from individuals and groups (Section 7.3), and then sets out the comments made by businesses (Section 7.4). In both Sections comments generally cover the following themes:

- General comments on the CAZ boundary and its implications on certain areas currently included or not included;
- Requests for additional areas to be included in the CAZ;
- Requests for specific areas to be removed from the proposed CAZ;
- Suggestions for alternative ways that the CAZ boundary could be defined; and
- Implications of the boundary position on certain journeys.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath, are reported in the individuals and groups section of this Chapter.

Overview of comments on the proposed CAZ boundary

Comments relating to the proposed CAZ boundary were extremely varied and highlight the importance of ensuring that the boundary is correctly defined. The feedback shows that there are a range of views. Whilst there was some feedback around very different ways of defining a boundary, the majority of feedback focussed on identifying potential amendments to the published proposed boundary. In summary these comments reflected:

- **Opinions that the zone should be smaller. The majority of respondents who expressed this view did so because of a desire to see through trips permitted and to ensure that every day essential journeys would not be impacted by a potential charge.**
- **Views that the zone should be larger. Whilst some respondents called for a larger zone because they felt that tackling current air quality issues in their area required bolder action, the majority of requests for a larger zone were made in response to concerns about the potential knock on effects of the CAZ.**

- Views that the zone should be designed in a way to enable specific journeys not to be charged, in particular journeys across the city, to the motorway and to key facilities, such as the hospital.
- Requests for minor adjustments to the boundaries to enable residents a route out of the city without clipping the edge of the zone.

9.2 Context for consideration of the comments made

The proposed CAZ boundary was defined based on the following rationale:

- The zone should be as small as possible to enable compliance with air quality targets and avoid impacting more people than is necessary.
- The boundary needs to be defined in a way that, as far as possible, avoids the potential impacts of rat running, allows safe opportunities for vehicles to turn around before they enter the CAZ, and minimises the impact of street clutter in the form of signage and cameras.

These principles would still need to be applied to any potential changes to the proposed boundary. It is also important to note that:

- If streets are considered for addition into the zone as a result of consultation feedback, it should be noted that residents in these areas may not have voiced their opinion during the consultation because they would not have been aware of a potential impact on them.
- If streets are considered for exclusion from the zone, it should be noted that residents in these areas may not have commented on the need for their area to be in the zone because they would have assumed that this was given.

9.3 Comments from individuals and groups

9.3.1 General comments on the proposed CAZ boundary from individuals/groups

The feedback included a range of general views on the size of the proposed CAZ. Some felt the zone was too large and should be made smaller, some felt that it was too small and should be enlarged. In some cases, respondents elaborated on this view, by specifying changes they would like to see, and these comments are reported separately in the Sections below. In other cases, a comment about the size of the zone was made in very general terms, and these are reflected here.

Those that stated that they were **generally happy with the proposed boundary** or that they broadly supported the proposals said:

- They were happy to see their street/local area/school included.
- Welcomed the zone because they felt it would make Bath a cleaner city, improve air quality and reduce traffic.
- Felt the boundaries looked logical and appreciated that they had been subject to detailed analysis.
- They were happy with changes that had been made since the original boundary (at SOC stage), to reflect comments about rat running etc.
- Did not wish to see the zone made any smaller.
- Felt that the boundaries should be monitored and reviewed.
- Could nevertheless, see that there would be some impacts, which would need to be carefully managed.

Those that commented (in general terms) that they **did not support the overall proposal for a CAZ or the boundary** identified (but where they did not make specific suggestions for amendments) typically expressed concern that:

- The CAZ should not go ahead at all or it is not the right way to address the issues.
- The proposed zone would penalise residents and not allow through traffic.
- The Scheme (generally and in relation to specific elements of the boundary) is designed to raise money for the Council.
- A CAZ would not work and is not appropriate for Bath.
- The overall proposal is short-sighted and not well thought out.

9.3.2 General comments on the size of the proposed CAZ boundary from individuals/groups

Those that expressed a general opinion that **the proposed CAZ is too big or should be made smaller** did so in range of different ways:

- The zone should include just the City Centre. Respondents defined the area they felt it should cover in different ways. For example, by saying it should cover just the City Centre (i.e. commercial/tourist zone), not include the residential areas, or should be more focused on the heart of the City, not extend to the south of the river and not extend out to the A36 or A4. The zone should cover the City Centre as it is defined in the Local Plan. Several **Parish and Town Councils** supported a smaller CAZ concentrated on the City Centre.
- The zone should allow people to travel around the outskirts of the city, from one side of the city to the other, to get out of the city, give residents more free movement and to get to important destinations such as supermarkets and petrol stations. It should therefore exclude the main routes, including the A36 and the A4.
- The zone should focus on particular locations only. The A4/London Road/Cleveland Bridge, the A36, Milsom Street, Queen Square, Gay Street, Southgate and George Street were specifically mentioned.
- There was concern that the size of the proposed zone was driven by a desire to generate revenue.
- There was concern that a zone of the size proposed would generate knock on impacts, in particular in relation to rat running.
- The zone proposed was perceived to be much wider to the west than to the east.
- There was some suggestion that the area in which cars are charged should be smaller (i.e. have a small inner Class D CAZ and a larger outer Class C CAZ).
- Respondents commented that the current boundary should not be described as central Bath.

Those that expressed the general view that **the proposed CAZ is too small or should be made larger** suggested that:

- The zone should cover a larger area generally. A wider zone was seen to mean that more people, particularly those in residential areas, would benefit from cleaner air. **Client Earth** commented that a large boundary would increase the likelihood of compliance.
- The zone should cover more of the areas where pollution is known to be a problem (e.g. London Road).
- The whole of the city should be included, the plans should be bolder, and the zone should include the whole of the World Heritage Site (WHS) (as suggested by **Bath Preservation Trust**), go out as far as the city boundary and should start at the Park and Ride sites to encourage their use.
- A larger zone would be a positive improvement. Some suggested that the charges should be lower, but the area wider.

- The zone should include all the approach roads and roads where people typically park/drop off, making the zone larger could prevent these issues being pushed to any area slightly further out of town.
- The zone should be larger to discourage people from driving around it/avoiding it/rat-running or parking on the outskirts. Respondents were sceptical that adjacent areas would not see an increase in traffic and felt that a larger zone would help to minimise these impacts. This view was echoed by many of the residents associations.
- The zone should include all the schools, as a way of tackling school traffic, and to improve air quality around schools.
- Some felt that the zone should either cover specific hotspots in the centre or the whole city and expressed the view that a middle ground was not appropriate.
- Given the uncertainty in the air quality modelling some respondents expressed the view that the zone should be made larger to increase the likelihood of achieving compliance with the legal limits.
- The zone should cover a larger area to decrease the number of entry/exit points and charge all vehicles entering and exiting Bath but not residents moving within the zone.
- The zone was perceived to be much more extensive to the west of Bath and some respondents felt that it should be extended to the east.

Other respondents expressed concerns about the **consequences of the CAZ**. These issues are reported in more detail in other Sections, but in brief there was concern that:

- The CAZ would encourage rat running outside the zone, in particular across the toll bridge and through Bathwick, Combe Down, Odd Down, Oldfield Park and Weston. Concern that these routes are inappropriate for more traffic and that this will lead, overall, to additional mileage. Some commented that these issues made the proposal unworkable. **The Green Party and the Liberal Democrats** both highlighted rat running as a particular concern.
- The CAZ would lead to increased traffic on routes further out, affecting outlying towns and villages, including across Wiltshire. This view was expressed by **Wiltshire Council** and several of the Wiltshire **Town and Parish Councils**.
- The CAZ would increase pressure for parking on residential roads outside the zone.
- Areas currently outside the zone would see worsening air quality due to the above.
- Concern that streets on the edge of the zone would be used for turning for those wanting to avoid entering the zone.

9.3.3 Requests for inclusion of specific additional streets within the CAZ from individuals/groups

Table 7-1 lists the roads/areas that respondents would like to see **INCLUDED** in the CAZ or roads/areas where respondents expressed concern about not being currently included in the CAZ but did not specifically request their inclusion. Please note therefore that not all comments reported here were outright requests for inclusion. These comments are reported together to highlight the range of issues that were reported in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. In certain locations some respondents expressed concern that their area was not included within the CAZ/requested for the CAZ to be made larger, whilst other groups felt that the better solution was for those areas to be removed from the CAZ/for the zone to be made smaller. The opposing views are set out in the next Section.

Table 9-1: Requests for inclusion of streets/areas in the CAZ

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<i>A4 London Road/Larkhall</i>	<ul style="list-style-type: none"> - More of London Road should be included, as this is one of the most polluted routes and traffic is often at a standstill. This view was expressed by individuals, as well as by Transition Larkhall and by South West Transport Network and Bus Users UK. - Various suggestions were made for where the zone should start, including at the junctions for Brunswick Street, Morrison's, Kensington Place, Upper Hayes East, St. Saviours Road, Claremont Road, Grosvenor Place, Gloucester Road, Alice Park, Batheaston Bypass/A46 Roundabout, Toll Bridge Road or Bailbrook Lane. Some felt the full length of London Road West into Batheaston should be included. - Respondents recognised that including London Road in the proposed zone was important. Some were surprised and concerned not to see more of London Road included. There was confusion why more of London Road was not included, given that: <ul style="list-style-type: none"> - Other less polluted streets are included. - This is a densely populated area, with schools etc. - Including more of London Road would help it to become more pleasant for people walking and cycling. - Unless more of London Road is included, traffic volumes are unlikely to decrease. - If London Road is not included people will rat run over the toll bridge and through Lansdown, Camden, Larkhall and Fairfield Park. - Streets off London Road should be included e.g. Brunswick Street, Upper Lambridge Street and Kensington Place. - Concern that if additional areas are not included Larkhall/Camden will see significant pressure for parking. - Larger areas of Walcot, Camden and Larkhall should be included. Or these areas should become access only. - Charlcombe Lane should be included to protect the roads, frogs, toads and newts. If it remains outside the boundary it will become more of a rat run.
<i>Pulteney Estate Residential area:</i>	<ul style="list-style-type: none"> - Respondents queried why this area had not initially been included in the proposed CAZ and felt that the zone should be extended to include the Pulteney Estate extending from Laura Place to Sydney Gardens, including Sydney Place, Darlington Street and the Bathwick roundabout.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - A36 Bathwick Street - A36 Darlington Street - Great Pulteney Street - Laura Place - Henrietta Road - Henrietta Gardens - Henrietta Mews - Grove Street - Sutton Street - Daniel Street - Daniel Mews - Vane Street - St Johns Road - Edward Street - William Street - Pulteney Mews - Argyle Street - Johnstone Street 	<ul style="list-style-type: none"> - Some mentioned the A36 only in this area, others called specifically for the inclusion of both the A36 and the residential area around Great Pulteney Street and Henrietta Road. - Pulteney Estates Residents Association (PERA) requested for the PERA area, extending from Laura Place to the top of Sydney Gardens and including Beckford Road, Sydney Road, Sydney Place, Darlington Street and Bathwick Roundabout and the area in between to be included in the zone. However, it should be noted that several individual respondents specifically stated that they did not agree with the residents' associations proposal to extend the CAZ to cover this area. Others suggested they would support the inclusion of this area if there were concessions for residents. - This area is predominantly residential but subject to significant stationary and slow-moving traffic and pollution is already too high. - Parking in this area is already difficult. The CAZ would create additional pressure for parking, rat running and increased use as a dropping off point (as it will be the closest area to the centre that it is not in the zone). There was concern that air pollution in this area will increase if a CAZ is implemented. If this area is excluded from the CAZ, parking will need to be strictly controlled. It was noted that access for emergency service vehicles is already difficult, because of parked cars. - Leaving this area out of the CAZ allows/encourages coaches to continue to use this area. There is particularly concern about coaches dropping off passengers at Laura Place. - Leaving this area out of the CAZ does not discourage vehicles coming in from Bathwick Hill or the Warminster Road. - Leaving this area out will increase rat running and queuing traffic/idling engines. Rat running is already a concern, for example on St. John's Road, Daniel Street and Henrietta Road as drivers try to avoid the A36. - Concern that this area is not included in the CAZ to enable parking at the rugby ground. - Leaving out this area will increase traffic on Great Pulteney Street, where noise and vibration from road traffic is already an issue. It would be the street allowing the closest access to the city centre whilst being outside the CAZ. - There are a number of significant/listed/locally important buildings/landmarks in this area which should be protected. - Excluding this area seems illogical. - Henrietta Park should benefit from cleaner air. - Respondents noted that residents in this area with asthmas and associated conditions are affected by air quality. If this area is not included it will become a rat-run and will be used by vehicles skirting around the eastern side of the city through Bathwick and Bathwick Hill. - The Rugby ground should be within the zone. There was some scepticism around the reasons why this may have been excluded. - Including these areas would create a better environment for walking and cycling. - Some respondents recognised that Bathwick Street forms an important part of the A36 through route and asked therefore for it not to be included.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Bath Preservation Trust queried why this area and the wider Bathwick area are not included in the zone and noted the need to protect the heritage as well as the people in this area. - FoBRA also suggested the boundary be extended to include Great Pulteney Street. - (Note that there is some overlap – many respondents also called for the gyratory and wider Bathwick area to be included and mentioned this area as a whole).
<p><i>Sydney Road/Sydney Place/Beckford Road gyratory</i></p>	<ul style="list-style-type: none"> - Sydney Place Residents Association specifically requested to be included within the zone and expressed concern that air quality levels have not been accurately monitored or modelled in this area. - Pulteney Estates Residents Association (PERA) also requested for this area to be included, in addition to the residential areas. FoBRA specifically requested that Sydney Gardens and Sydney Place be include in the zone. - Responses highlight that in this area there are high numbers of elderly people and sensitive historic buildings. - Concern that this area will become a rat run, a turning point and a drop off area.
<p><i>Wider Bathwick area including:</i></p> <ul style="list-style-type: none"> - Bathwick Estate - Bathwick Hill (including routes off) - Cleveland Walk - North Road - A36 Warminster Road - A36 Beckford Road - Sydney Gardens - Pulteney Road - Beckford Gardens - Rockcliffe Road - Rockcliffe Avenue - Forester Road - Forester Avenue - Sydney Mews - Raby Mews 	<ul style="list-style-type: none"> - The Bathwick area is a high density residential area. Air quality in these areas is currently poor and residents in this area also experience noise pollution. The Bathwick Estate should therefore be included in the zone. - Clean Air for Bathwick submitted a petition with 45 signatures requesting for the wider Bathwick area to be included in the zone. - Friends of Sydney Gardens have requested the inclusion of Sydney Gardens and the surrounding roads. - Bathwick Hill Residents Association stated that they supported an extension of the zone to include the Bathwick gyratory and the bottom on North Road. - Widcombe Association stated that an extension of the zone into the Bathwick estate would help address potential rat runs and support the inclusion of Great Pulteney Street. - FoBRA requested that the bottom of North Road be included in the zone. - The boundary on the A36 Warminster Road should extend to St Christopher's Close or Down Lane. This would reduce rat running on Mill Lane and across the toll bridge. - Traffic volumes including HGVs, on these routes are already very high, particularly on Warminster Road, Beckford Road, North Road and Bathwick Hill The CAZ should be enlarged to include these areas to stop this increasing. - The current boundary will push additional traffic onto these routes and including this area would prevent traffic trying to skirt around the east of Bath and avoid creating rat runs. Particular concerns about the Cleveland Walk area, North Road, Warminster Road, Bathwick Hill and Sydney Buildings (specifically the bottom end) being used as a rat run. - Raby Mews is already a rat run and should be included in the CAZ.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - This area has schools e.g. King Edwards school and Bathwick St Marys and pupils deserve clean air. These areas should be in the zone. There was concern that the current boundary would increase traffic past the school, resulting in safety concerns. - Bathwick St Mary's Church School specifically requested to be included within the zone. - The area is well used by pedestrians for example using Bathwick Hill to access the University and many buses use Bathwick Hill and these are perceived to be particularly polluting. - The CAZ should include the three main routes to the University. - The junction of Bathwick Hill and the A36 should be included, at least. - North Road is particularly unsuited to heavy vehicles and has subsidence issues, they currently don't adhere to the weight restrictions in this area and there are concerns this would get worse with CAZ implementation, so it should be included. - Some respondents felt this area should be included alongside the Great Pulteney Street area (the area described above). Others commented specifically on these roads and did not mention the area above. - Some respondents who called for the Bathwick area to be included in the zone also called for inclusion of the Great Pulteney Street/Henrietta Road area. - This area will get busier in future with the development of the former MoD site. - The zone should extend as far to the east as it does to the west. - However, one response acknowledged that some local residents were calling for this area to be included and noted that not all local residents support this extension proposal.
<p><i>Link between Widcombe Hill and Bathwick Hill</i></p> <ul style="list-style-type: none"> - Sydney Buildings - Horseshoe Walk - Abbey View - The Tynning 	<ul style="list-style-type: none"> - The Tynning, Abbey View, Horseshoe Walk and Sydney Buildings should be included to prevent rat running between Widcombe Hill and Bathwick Hill and Pulteney Road and to prevent these areas becoming a drop off zone. - There are also concerns over the area having increased parking and dropping off issues. - Concern over placement of cameras in sensitive area, especially on the canal bridge. - Sydney Buildings Householders Association requested that this area be included to help prevent rat running. This route is currently considered dangerous at peak times, with narrow sections and bends.
<p><i>Bathampton/Batheaston</i></p>	<ul style="list-style-type: none"> - Parts of Bathampton should be included within the CAZ, specifically the toll bridge/Mill Lane/London Road West and the A36. This would prevent traffic re-routing over the toll bridge and through the High Street, an already congested area. This would also prevent making the air quality worse, in a sensitive area due to the presence of a school. - Batheaston Parish Council suggested that the CAZ be extended to include the toll bridge roundabout, the High Street, Bathampton village, Warminster Road and North Road. - Bathampton Parish Council asked for consideration of an extension to the CAZ to include all of Bathampton, including the bottom of Warminster Road and North Road and including a 'bubble' CAZ covering Mill Lane.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<p>They noted that including the whole of Bathampton would have implications to residents and visitors.</p> <ul style="list-style-type: none"> - A mini CAZ for Bathampton was suggested to avoid increased traffic in Bathampton/over the toll bridge. - There was some concern that the amount of traffic using these areas as a result of the CAZ was underestimated. - Concern that Bathampton will become a parking area for commuters, shoppers and people parking and then cycling or catching public transport. - <u>Bathampton Primary School</u> would support an extension of the zone into Bathampton.
<p><i>Widcombe area</i></p> <ul style="list-style-type: none"> - <i>Widcombe Hill and surrounding area</i> - <i>Church Street</i> - <i>Prior Park Road</i> - <i>Forefield Rise</i> - <i>Lyncombe Hill</i> - <i>Greenway Lane</i> - <i>Lyncombe Vale</i> - <i>Millbrook Place</i> - <i>Rosemount Lane</i> 	<ul style="list-style-type: none"> - Widcombe is a high density residential area and is central so should be included. - Widcombe should be included as it currently has severe congestion and is one of the more polluted areas of Bath. - The zone should extend further up Widcombe Hill as far as The Tying, Church Street or Darlington Place. - The zone should extend further up Prior Park Road, possibly up to Ralph Allen Drive. - Millbrook Place, Widcombe should be included as this already has parking problems. - The bottom of Lyncombe Hill is frequently used as a drop off point and a cut through to Prior Park Road, if it is outside the zone this could increase. - Greenway Lane and Lyncombe Hill are favoured rat runs. Specific request to include Lyncombe Hill in the zone. - Concern that the inclusion of Claverton Street will lead to rat running on Lyncombe Vale and Rosemont Lane. Some felt these routes should be included in the zone. - Include Forefield Rise, Rosemount Lane and Church Street. - <u>Widcombe C of E Junior School</u> commented that they support the proposed boundary, which now includes Widcombe school and would like to see a larger area of Widcombe and Pulteney Road included.
<p><i>Larger stretch of the A36 Lower Bristol Road</i></p> <ul style="list-style-type: none"> - <i>Windsor Bridge</i> - <i>Lower Bristol Road</i> - <i>Twerton</i> - <i>Midland Road</i> 	<ul style="list-style-type: none"> - Respondents made a range of comments relating to the A36. Some felt that all of the A36 should be included in the zone, for example to the junction with Bellotts Road. Others highlighted specific sections. - This area should be included as idling traffic is the norm and it is a rat run. - The zone should include Midland Road/Destructor Bridge and Western Riverside Development otherwise these routes will become a rat run between the A4 and the A36. - Including Windsor Bridge would force traffic further out and would be more of a deterrent. Respondents frequently called for Windsor Bridge to be included as this is a congested route and suggested that it should be the western extent of the zone, and that this will help prevent rat running through Oldfield Park. Others went further to suggest that the A36 should be included out to Lidl. - Twerton should be included and already suffers from pollution. - Extend to Dorset Close to include routes to Oldfield Park infants. Also include Hayesfield School and the surrounding roads.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Include Bath Western Riverside. - <u>South West Transport Network</u> and <u>Bus Users UK</u> felt the whole of the A36 should be included.
<p><i>Longer length of the A367 Wells Road</i></p> <ul style="list-style-type: none"> - Wells Road - Oldfield Road - Bloomfield Avenue - Bloomfield Road - Hatfield Road - Englishcombe Lane - Entry Hill - Holloway - Hayesfield Park Road - Frome Road - Bradford Road 	<ul style="list-style-type: none"> - More of/all of the A367 Wells Road should be included as air quality is poor, the route is congested and buses from the Park and Ride are held up in congestion. - Including more of Wells Road would help to prevent areas to the west, particularly Oldfield Park, being used as rat runs. - Hayesfield Park Road should be included otherwise it would be used for parking or as a short cut. - Various suggestions as to where the boundary should end: <ul style="list-style-type: none"> - South of the junction with Oldfield Road, therefore including this junction to prevent rat running along Oldfield Road and Junction Road. <u>FoBRA</u> supported this view. (Note that there was some confusion as to whether the boundary at Oldfield Road was shown correctly on the map or whether the proposal had changed since publication. The consultation map correctly showed the boundary to the north of Oldfield Road). - At the junctions of Bloomfield Avenue, Bloomfield Road or Englishcombe Lane/Hatfield Road (As supported by the <u>Bear Flat Association</u>). - <u>South Stoke and Midford Parish Council</u> supported an extension up to the Midford Road junction - Other suggestions that the zone should extend as far as the Red Lion/Frome Road junction or the Park and Ride and to include Rush Hill, Frome Road, Bradford Road, Englishcombe Road and North Road. Suggestion also that Hensley Road and Egerton Road should be included. - Extending further up Wellsway will help to prevent Greenway Lane becoming a rat run. The CAZ should include Greenway Lane. - Concerns that Magdalen Road and Holloway will become a drop off zone as these are the closest streets to the southern boundary, including them may mitigate this. Request to include Holloway in the zone. - Extend the zone out to Bear Flat. <u>The Bear Flat Association</u> requested to extend and clarify the CAZ boundary around the Wells Road up to the junction with Greenway Lane/Englishcombe Lane. - <u>South Stoke and Midford Parish Council</u> would like to see the CAZ boundary extended up the Wells Road to Midford Road
<p><i>Oldfield Park area</i></p> <ul style="list-style-type: none"> - Dorset Close - Bellotts Road - Brook Road - Brougham Hayes - Moorland Road - Upper Oldfield Park - Oldfield Road - Junction Road (B3111) 	<ul style="list-style-type: none"> - Concern that the current boundary will force traffic and parking into Oldfield Park and cause worsening air quality. The CAZ should extend further west to include the Oldfield Park area. - Oldfield Park is one of the more polluted areas. - These are routes that would be used to avoid the zone and are already used as rat runs. - Moorland Road should be included to avoid it being used as a route to the motorway/to prevent it becoming more congested/ it has poor air quality - Oldfield Park should be included up to Brook Road/Bellotts Road/Using Linear Park as the boundary.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<ul style="list-style-type: none"> - King Edward Road - Bloomfield Avenue - Coronation Avenue 	<ul style="list-style-type: none"> - All of Oldfield Park should be included. The boundary should be extended to Oldfield Road, as this is already a rat/run and this problem would be worsened if not included. Also, other respondents suggested the boundary should be further out again, to Bloomfield Road. The Oldfield Road/Wellsway junction should be included. - The B3111 Junction Road would otherwise carry more traffic and is unsuitable for increased traffic. It should be included within the zone or reclassified. - The Lower Oldfield Park Residents Association commented that the boundary should include the B3111 and Bloomfield Avenue. - Some felt an extension to include Oldfield Park would be less necessary if traffic were allowed to turn left from Brougham Hayes onto the Lower Bristol Road without entering the CAZ. - Bloomfield Avenue, Oldfield Road, King Edward Road and Moorland Road should be included. - There are various nurseries, residential homes, doctors' surgeries and schools in this area that should be included, with particular calls for Oldfield Park Infant School to be included within the zone. - However, others felt that Oldfield Park surgery should not be in the zone.
<p><i>A4 Upper Bristol Road/Newbridge Road</i></p> <ul style="list-style-type: none"> - Upper Bristol Road - Newbridge Road - Kelston Road - Ashley Avenue - Station Road 	<ul style="list-style-type: none"> - All of the Upper Bristol Road should be included, towards Newbridge and the Park and Ride. - Specific mention of industrial operations on Newbridge Road that generate high numbers of HGVs and would be deterred by the CAZ. - Newbridge Road is currently being used as parking for LGVs and for the hospital. If the area is not included in the CAZ these pressures will increase. - Air quality on Newbridge Road is currently poor. Concerns this would be worsened if not included in the zone. - Include Ashley Avenue (adjacent to Windsor Bridge) or otherwise deal with parking issues. - Concern that Station Road, is already used as waiting zone for taxis. - Access should be allowed to the Brassmill industrial estate. - Extend the area further west to include Kelston Road/Oldfield School. The Edward Street area in Lower Weston is used currently for commuter parking and should be included in the CAZ to avoid this getting worse.
<p><i>Weston/Victoria Park area</i></p> <ul style="list-style-type: none"> - Lansdown Lane - High Street (Weston) - Weston Road - Combe Park - Park Lane - Edward Street 	<ul style="list-style-type: none"> - Include more of/the whole of Weston. - Weston could become a major route to the M4, increasing traffic on unsuitable and steep roads, where there have been fatal accidents in the past. - Extending further west will prevent Weston village being used as a short cut to the motorway. - Sion Hill should be included in the zone as should the Cavendish Road/Sion Hill junction. - Concern that Park Lane will become a rat run if not included. - Weston Lane should be included to avoid rat runs through residential streets. - Extend further west to ensure the Victoria Park play area is well inside the zone.

Location suggested for INCLUSION or where concern expressed about exclusion	Reasons given by respondents
<p><i>Lansdown</i></p> <ul style="list-style-type: none"> - <i>Lansdown Road</i> - <i>Lansdown Place</i> - <i>Lansdown Crescent</i> - <i>Upper Lansdown Mews</i> 	<ul style="list-style-type: none"> - The Edward Street area in Lower Weston is currently used for commuter parking and should be included in the CAZ to avoid this getting worse. - Lansdown Crescent is already a rat run. The CAZ would increase traffic and pressure for parking. - The CAZ should extent further along Lansdown Road. Suggestions included as far as the junction with Sion Road or to the Park and Ride. - Areas off Lansdown Road are currently not within the Residents Parking Scheme – concern that the CAZ would lead to increased pressure for parking in these areas, e.g. Upper Lansdown Mews. - <u>Lansdown Crescent Residents Association</u> support the proposed boundary in its inclusion of St Stephen's Church but asked that consideration be given to moving the camera at Cavendish Road to Sion Road to avoid cars undertaking dangerous manoeuvres.
<p><i>Camden Area</i></p> <ul style="list-style-type: none"> - <i>Belgrave Crescent</i> - <i>Camden Road/Crescent</i> 	<ul style="list-style-type: none"> - General concern that these areas would become a rat run if they are not included, including Camden Road, Eastbourne Avenue and Claremont Road - Respondents who wished to see more of Camden included also supported an extension of the zone along the A4 London Road. - The zone should start further east, perhaps at Frankley Buildings – the current boundary will encourage Belgrave Crescent to be used for turning and it is not appropriate for this. <u>Camden Residents Association</u> noted this issue and requested clear signage to discourage drivers making unsuitable manoeuvres. - Extend the boundary out to Bennetts Lane to included Belgrave Crescent. Concern that Gays Hill is not a good turning place or escape route. - Extend the zone to include Tynning Lane/Eastbourne Avenue.
<p><i>Schools</i></p>	<ul style="list-style-type: none"> - Respondents expressed concerns about schools not being included in the CAZ. - The CAZ should include the areas around Bathwick St Mary's, King Edward's, Beechen Cliff, Hayesfield, The Paragon, Royal High School and Oldfield Park Infant's School. - There was serious concern that the CAZ may increase traffic past schools by diverting traffic into areas around schools. - <u>Bathwick St. Mary's School</u> specifically requested to be included in the zone.
<p><i>Wider area</i></p>	<ul style="list-style-type: none"> - Some respondents felt that the zone should cover the whole city and extend out as far as the Park and Ride sites. - <u>Bath Preservation Trust</u> and <u>Bathampton Parish Council</u> called for consideration of the CAZ boundary to extent to the WHS boundary. - Some respondents suggested that routes further out from the centre should somehow be included, to prevent rat runs. North Claverton and Bradford Road were mentioned.

9.3.4 Requests for the exclusion of streets from the CAZ from individuals/groups

Table 7-2 lists the roads that respondents would like to see **EXCLUDED** from the CAZ or routes where they expressed concern about their inclusion (Table 7-2). Please note therefore that not all comments reported here were outright requests for exclusion. These comments are reported together to highlight the range of issues that were highlighted in each area.

It is important to note that, in many cases, the opposite point of view was also put forward. That is, whilst, in certain locations some respondents expressed concern that their area was included within the CAZ/requested for their area to be excluded, other groups felt that the better solution was for that area/additional streets to be included/for the zone to be made larger. The opposing views are set out in the previous Section.

Table 9-2: Requests for exclusion of streets/areas in the CAZ

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<p><i>A4 London Road/A36 Cleveland Place Junction</i></p>	<p>Respondents identified the junction of London Road and Cleveland Place as an area they would like to see removed from the zone, or an area that they felt caused issues through its inclusion. The reasons for this view included the following:</p> <ul style="list-style-type: none"> - To allow traffic to get around/out of the city, to the motorway (M4) and to the A36 Warminster Road or the A4/A46. Respondents expressed concern about the inclusion of the A4, the A36 and the A367 – all the through routes – given that there is no bypass/alternative route. - To allow traffic to get from the east of Bath to the University and other destinations such as the fire and ambulance station, as well as schools south of Bath and the hospital. - This is one of very few river crossings and there are no alternative routes (other than the Batheaston toll bridge). - Inclusion of this junction will encourage more traffic to use routes through Batheaston and Bathampton, including the toll bridge, and this will have knock on effects for residents in this area. - Traffic would seek alternative unsuitable routes through local towns, for example; Bradford on Avon, Winsley and Limpley Stoke or via unclassified roads. - It would be unsafe if drivers decided to make a last-minute change of route to avoid the CAZ. There is no space to turn. - Some drivers would incur the charge just for using this corner. Respondents felt strongly that drivers using this junction to get out of the city should not be penalised and emphasised that many vehicles using this junction are not entering the city centre. - Concern that the inclusion of this junction is generated by a desire to make money/collect additional charges. - Respondents felt that the above issues could be addressed by a small change to the boundary at the junction. - Without an A46/A36 bypass this corner is unavoidable for many trips. - Concern that including this corner restricts access to Morrison's. - This junction is on an important route to the hospital, especially from Wiltshire. - <u>Avon and Wiltshire Partnership NHS Trust, Hilperton Parish Council, Heywood Parish Council, Winsley and Westwood Parish Council and Westbury Town Council</u> all support exclusion of this junction.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
<p><i>East of A36 Pulteney Road</i></p> <ul style="list-style-type: none"> - <i>Lime Grove/Lime Grove Gardens</i> - <i>Pulteney Gardens</i> - <i>Pulteney Avenue</i> - <i>Horseshoe Walk</i> 	<ul style="list-style-type: none"> - Residents of these streets with non-compliant vehicles would need to pay the charge even if heading out of the city – they would pass through a very small section of the zone. These streets do not need to be in the zone. - Lime Grove Gardens is fully within the zone but is a dead end. - Boundary seems illogical to residents. - Concern about impact of cameras and signage on canal bridge on Pulteney Gardens.
<p><i>Widcombe:</i></p> <ul style="list-style-type: none"> - <i>Widcombe Hill</i> - <i>Prior Park Road</i> - <i>Claverton Street</i> - <i>Lyncombe Hill</i> 	<ul style="list-style-type: none"> - Widcombe is not part of the city centre. - Residents need to be able to access the shops in Widcombe and including the Widcombe loop affects this. - The current boundary would affect access to Armes Court. - The current boundary would affect access to Widcombe Infant School. - Non-compliant vehicles turning from Widcombe Hill into Prior Park Road would incur a charge for clipping the edge of the zone. - As proposed, the CAZ will mean that Church Street/The Tynning will be used as a rat run. - The current boundary will encourage rat running on Greenway Lane and lead to worsening of parking problems on Lyncombe Vale which does not have residents parking. This will cause problems near to The Paragon School. - Widcombe Baptist Church should be outside of the zone to allow access for the congregation. - The boundary near the A36 should allow pick up/set down close to Halfpenny Bridge, by allowing access around the Widcombe loop. - <u>Foxhill Residents Association</u> requested the removal of the Widcombe loop.
<p><i>A36 section including:</i></p> <ul style="list-style-type: none"> - <i>Lower Bristol Road</i> - <i>Claverton Street</i> - <i>Rossiter Road</i> - <i>Pulteney Road</i> 	<ul style="list-style-type: none"> - Respondents felt that the A36 should not be included in the zone because it is a main road, it is the main route around Bath, main east/west route, a key route to the motorway and there is no alternative route. - There needs to be a way for traffic to get around the perimeter of the city. There should be at least one through route. - There were various suggestions about where the zone should end. Typically, respondents suggested that this route should be excluded up to the Churchill Bridge roundabout/the A36/A367 junction or from Westmoreland Road and Midland Bridge. - <u>The Road Haulage Association</u> expressed a strong view that the A36 should be excluded from the zone. - <u>Trowbridge Town Council</u> and others requested for the A36 to be excluded from the CAZ. - <u>The British and Vehicle Licensing Association</u> noted concern about inclusion of A36, due to the impact on freight movement. - HGVs need to use this route and there are not suitable alternatives for HGVs. - The A36 is not part of the city centre (respondents felt the CAZ should only cover the city centre).

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - No need to include routes south of the river/the CAZ should only cover the area of the city to the north of the river, they also argued that the river would be a more logical southern boundary, Heywood Parish Council support this. - This route is important to access supermarkets and retail outlets (Sainsburys, Homebase and Lidl) and petrol stations (see below). - Including the A36 will encourage more traffic to rat run through residential areas, particularly Oldfield Park, Combe Down, Claverton Down and Twerton and between Newton St Loe and Hinton Charterhouse and Bradford on Avon. Particular concern about HGVs taking alternative, inappropriate routes. - Including this route will affect many people's frequent journeys, for example to work, to the motorway and to the RUH. It is an important route for commuters. - Many of those who requested the exclusion of the A36 specifically highlighted the need to exclude the junction of the A36 and the A4 London Road (see below). - It was noted that the A36 is sometimes used as a diversion route and questions asked about how this would work if it were in the CAZ. - Churchill Bridge and Midland Bridge should not be included. - Including the A36 affects lower income families in Twerton, Newbridge and Weston. - There was concern that inclusion of the A36 was driven by a desire to raise additional revenue. - As well as asking for the part of the A36 currently included in the zone to be excluded, respondents asked that the section currently not included (Bathwick Street) should not be included, as this is part of the through route. - Businesses located off the Lower Bristol Road, such as in the Midland Bridge area, should not be in the zone. - The A36 is an important route to the hospital from the east/south of Bath. - Foxhill Residents Association requested that Rossiter Road and the Widcombe area be removed from the CAZ.
A367 Wells Road and Churchill Gyratory (Junction with A36)	<ul style="list-style-type: none"> - Respondents who requested for the A36/Lower Bristol Road to be excluded typically also mentioned Wells Road. The A367 is an arterial route and should not be included as it is an important route out of/around Bath. - Without a bypass, for many trips there are no appropriate alternative routes. - Respondents felt that the zone extends too far south and need not include Wells Road. - The A367 is an important part of the route for traffic from the south of Bath accessing the motorway. - There was concern that including Wells Road, as shown, would lead to rat running through Oldfield Park, Combe Down, Lyncombe Hill and surrounding villages. - Concern that including Wellsway will increase traffic on Junction Road and Lower Oldfield Park. - Wells Road is a main route to the railway station and the RUH from the south of Bath. - This affects access to schools such as Hayesfield School, Beechen Cliff, Ralph Allen and local services in Oldfield Park. - Hayesfield Park should be excluded because this disadvantages residents. - This will affect businesses on the trading estate.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Including this area would affect the local shopping areas. - This affects access to the Park and Ride at Odd Down. - It was noted that the A367 is used as a diversion route and that it would be unfair to charge people under these circumstances. - Including the junction of Upper Oldfield Park and Wellsway was considered illogical as this would force traffic down the B3111, which is unsuitable for increased traffic. If this junction were outside the CAZ it would enable access from the south to the doctor's surgery on Upper Oldfield Park. - Inclusion of the section between Upper Oldfield Park and Oldfield Road affects residents but does not seem to add much benefit. - Upper Oldfield Park Residents Association specifically requested that the boundary of the CAZ remain at the intersection of Wells Road and Oldfield Road. - It was suggested that it should be possible for vehicles to cross Wellsway without charge.
<p><i>Route to allow access to Sainsburys and the petrol station, Green Park, Homebase etc</i></p> <ul style="list-style-type: none"> - A36/Lower Bristol Road - Pines Way - Bath Riverside Development - Stothert Avenue - Midland Bridge 	<ul style="list-style-type: none"> - Respondents felt residents ought to be able to access these facilities without entering the CAZ, especially given that accessing Morrison's on the east of Bath would require driving through the zone. - Excluding the Pines Way Gyratory here would give an opportunity for drivers who do not want to enter the CAZ to turn around. - Midland Bridge, allowing the gyratory to be outside, would be a more appropriate boundary. - If the Sainsbury's is within the zone it will discourage people from shopping locally and result in people shopping at alternative locations, such as Keynsham. - Preventing access to the petrol station will result in people driving further to fill up. Sainsbury's also offers a pharmacy which is open late. - It would affect the farmers market. - It will mean that residents of Western Riverside Development; (Stothert Avenue and streets off, including Albert Crescent, Percy Terrace and Victoria Bridge Road) have to enter the zone to exit their street as the other end of Stothert Avenue is to become a bus gate. If Pines Way is included in the zone, vehicles need to be allowed to use the Destructor Bridge. - Weekly shopping and DIY materials cannot be carried by bus. - Inclusion of this area affects access to the industrial estate. - Inclusion of Pines Way affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park.
<p><i>Brougham Hayes Road/Junction with A36 Lower Bristol Road</i></p>	<ul style="list-style-type: none"> - Concern that traffic turning left from Brougham Hayes onto the Lower Bristol Road westbound (and vice versa) will incur a charge for a journey that is not going into the city centre. This route is used to access the RUH and destinations towards Bristol and by residents from Westmoreland. Concern that many drivers will incur a charge for clipping the very edge of the CAZ. - Concern that including this junction will lead to rat running through Oldfield Park, Twerton and on Dartmouth Avenue, West Avenue, Moorland Road, Lyndhurst Road, Millmead Road, Ringwood Road, Brook Road, Bellotts Road, past Oldfield Park Junior School and across Windsor Bridge. - School buses use this junction.

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Inclusion of this junction affects access to Hayesfield School and access to the hospital. Hayesfield School specifically asked for the junction to be removed from the zone. - Inclusion of this junction affects the arrangement Hayesfield School has to allow pupils to be dropped off in the Homebase car park - If this junction is included it impacts residents of Oldfield Park who need to access the city or the motorway. - There was concern that this junction had been included to raise revenue. - Hilperton Parish Council requested an exclusion of this junction to allow access from the south of Bath to RUH. - It should be noted that Upper Oldfield Park Residents Association specifically commented that this junction should remain inside the CAZ.
<i>South of A36</i>	<ul style="list-style-type: none"> - Westmoreland Street, off the A36, is a dead end but included on the edge of the zone – there is no alternative but to enter the zone. - There is no need for the zone to cover the houses to the south of the Lower Bristol Road.
<i>A4 Upper Bristol Road</i>	<ul style="list-style-type: none"> - Upper Bristol Road should be excluded as it is a key through route. It is important to allow people to move across the city. - Argos should not be included.
<i>Victoria Park/Weston area to include:</i> <ul style="list-style-type: none"> - <i>Weston Road</i> - <i>Marlborough Road</i> - <i>Cavendish Road</i> - <i>Cranhill Road</i> - <i>Julian Road</i> - <i>Park Lane</i> 	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access Victoria Park, a public amenity, without entering the zone and felt that if it were included they and their families would use these facilities less and this would lead to people undertaking less exercise. - Including Victoria Park hinders access to the golf course. - Families ought to be able to access, at least, the western part of Victoria Park. - Concerns that including the park will affect tourism and is included to make money from visitors. - It was noted that the park is used as a Park and Walk location. - This area, extending out to Julian Road and Weston Road and areas to the north, are lightly trafficked and emissions here are low and therefore should not be included. These are also important routes out of the city. - Including the areas north of Weston Road is likely to lead to congestion and parking problems in Sion Hill and Lansdown. - Inclusion of this area prevents traffic from going north-south through the city. - Some respondents felt that drawing the west boundary to Marlborough Lane/Cavendish Road /Weston Road would be preferable. - Inclusion of Cavendish Road was considered unnecessary by some (although note that the Cavendish Road Society stated they were pleased to see this road included in the zone). - Excluding Marlborough Road would allow access to Charlotte Street car park without entering the zone. - Concern that Weston Park will see increased pressure for parking. - Concern that routes in this area (Weston Lane, Julian Road and Marlborough Road) are used to access the hospital. - Social housing on Julian Road would be negatively affected – this road should not be included. - Respondents were keen to see Park Lane outside the CAZ (some respondents were not clear that it is not included in the boundary proposed).

Location suggested for EXCLUSION or where concern expressed about inclusion	Reasons given by respondents
	<ul style="list-style-type: none"> - Respondents felt it was not necessary to go as far out as Victoria Park or Weston. - Cranhill Road and Cranhill Nursing Home should be outside of the CAZ (detailed boundary change). Cranhill Road is a small cul-de-sac of 8 homes.
<p><i>Lansdown/Walcot</i></p> <ul style="list-style-type: none"> - <i>St James Park</i> - <i>Lansdown Crescent</i> - <i>Lansdown Place East</i> - <i>Upper Lansdown Mews</i> - <i>Richmond Road</i> - <i>Lansdown Road</i> - <i>Lansdown Grove</i> - <i>St Stephen's Road</i> - <i>Mount Road</i> - <i>St Stephen's Close</i> 	<ul style="list-style-type: none"> - The zone should be kept more central and not extend up Lansdown Road. It should stop before St. Stephen's Church. - The zone should not include St. James's Park as this area does not have existing issues. - St. Stephen's Close should not be included as non-compliant vehicles turning up the hill and out of the city will incur a charge for clipping the edge of the zone. - Including the corner of Lansdown Road and Richmond Road will encourage traffic to rat run through Charlcombe Lane, which is narrow and unsuited to additional traffic. The boundary should be moved slightly south to allow turning from Lansdown Road into Richmond Road. - Lansdown Grove and St. Stephen's Road area should not be included as traffic heading north would clip the edge of the zone. - St Stephen's Road does not need to be included, with a sharp hair pin bend it is very unlikely to become a rat run. The CAZ should start below the St Stephen's Road junction. Concern that the boundary as drawn includes the private access road to a single dwelling and the zone could stop further down the road, although the property owner generally supports St Stephen's Road being in the zone to prevent rat running. - Mount Road residential area does not need to be included because it is mainly older people, few cars and very low mileage users. - This area is not considered to be polluted.
<p><i>Camden area</i></p> <ul style="list-style-type: none"> - <i>Camden Crescent/Road</i> - <i>Belgrave Crescent</i> 	<ul style="list-style-type: none"> - Concern expressed that inclusion of Camden Road and Camden Crescent, as well as Weston Road prevents routes across the city. - One respondent noted that Belgrave Crescent, which is currently on the edge of the zone, should not be included in any boundary change/extension. This would not be necessary to tackle emissions.
<p><i>Central area</i></p> <ul style="list-style-type: none"> - <i>Car Parks</i> 	<ul style="list-style-type: none"> - Residents expressed concern about the inclusion of various central streets because of the impact this would have on their own personal journeys, including George Street, High Street, Dorchester Street, James Street West, Kingsmead, Morford Street, Norfolk Crescent, Northampton Street, Queen Square, Royal Crescent, The Paragon and the area around The Forum, - Car parks, including Avon Street, Southgate and Charlotte Street should be excluded.
<p><i>Pick up/drop off areas</i></p>	<ul style="list-style-type: none"> - Respondents commented that the area around Halfpenny Bridge is a useful place to set down passengers and felt that a convenient drop off location should be accessible without entering the CAZ.

9.3.5 Concern about journeys that would be impacted by the CAZ from individuals/groups

Respondents expressed concern that the proposed CAZ would prevent them making or impact specific journeys or accessing particular destinations and called for routes to these destinations to be excluded from the CAZ. Comments received are shown in Table 7-3 and included:

Table 9-3: Concerns about journeys into or through the CAZ.

Destination or journey identified	Detail given/comments made
<i>East west and north south routes/routes across the city</i>	<ul style="list-style-type: none"> - Respondents felt that the boundary should acknowledge the need for routes to go east-west and north-south across the city, including to the motorway, particularly as there are no alternative routes. Generally, respondents felt that there should be routes around the CAZ. - Inclusion of the A4, A36 and A367 make it difficult to undertake journeys across and around Bath without entering the CAZ. It was particularly noted that traffic that needs to go between the A36 and the A46 has little option but to route through the CAZ. - Many trips are not going to the city centre – traffic needs to be allowed to go around Bath. - There was concern that inclusion of the main routes penalises residents living in Bath but working elsewhere i.e. it impacts on their journeys to leave the city. - Concern that this will have impacts on surrounding areas, such as Bradford on Avon. - There was concern that the boundary includes too many of the practical routes that residents need to use to move around the City.
<i>Access to the RUH</i>	<ul style="list-style-type: none"> - There was particular concern that the main routes to the RUH from Wiltshire/east of Bath are included within the proposed CAZ boundary and also the route to the University (specifically the London Road/Cleveland Place junction).
<i>River crossings</i>	<ul style="list-style-type: none"> - Respondents felt the CAZ should not cover all the river crossings.
<i>Access to the M4</i>	<ul style="list-style-type: none"> - Many trips to the motorway, for example from the south of Bath, would enter the CAZ even though they are heading out of the city. Respondents felt that the CAZ should not impact on access to the motorway. - Radstock Town Council and Midsomer Norton Town Council were concerned about access from the south of Bath to the M4. - There were concerns that routes taken to avoid the CAZ would impact on other areas, in particular Wiltshire towns and villages.
<i>Car Parks</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access main car parks (particularly Charlotte Street and Avon Street) without entering the zone or that there should be more parking on the edge of the zone. - There was concern that including the car parks would mean that the Park and Ride would become overloaded.
<i>Supermarkets</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access supermarkets without entering the zone. - There was particular concern that Sainsbury's, Homebase and Waitrose are included within the zone, but respondents also noted that accessing Morrison's would be impacted for anyone approaching from the city side.
<i>Petrol stations</i>	<ul style="list-style-type: none"> - Respondents felt it should be possible to access petrol stations without entering the zone, and that the zone prevents access for some to the main Bath petrol stations.
<i>Bus and rail station</i>	<ul style="list-style-type: none"> - Respondents felt that it should be possible to access/drop off at these public transport hubs without entering the zone. Respondents noted that the Park and Ride is not a viable option for rail journeys that return late at night.

Destination or journey identified	Detail given/comments made
<i>Public buildings/services</i>	- Respondents commented that routes to public buildings, shops and services should not be included in the CAZ, with particular mention of the sports centre/ The Rec, college, schools, parks, council buildings, University, recycling centre, hospitals, doctors' surgeries, Royal Mail sorting office and places of worship.

9.3.6 Alternative boundary solutions identified from individuals/groups

Within the responses a number of suggestions for alternative ways of determining the CAZ boundary were suggested. These included:

- Include only main roads and exclude all local roads. This would allow residents to travel within their immediate areas without incurring a charge for non-compliant vehicles.
- Charge people to enter the zone via entry points located further out of the City. For example, at the bridges or major junctions.
- Initially allow trips within the zone to be undertaken without a potential charge/ sunset period.
- The CAZ should be considered to line up with Residents Parking Zones (RPZs).
- The CAZ boundary should align with the World Heritage Site boundary.

9.4 Comments relating to business in Bath

9.4.1 Quantitative feedback

Question 8 of the Questionnaire for Businesses asked respondents which concessions were likely to apply to them in 2 years' time.

Of the 250 businesses of responded to the question;

- 82% stated that none of the available concessions would apply; and
- 8% responded that at least one of the available concessions would apply to their vehicles.

Question 9 asked respondents to rank their top 3 proposed concessions. This included concessions offered until 2022 and 2025. 198 business respondents answered Question 9, of these the most frequently ranked proposed concessions were:

- *"Emergency service vehicles (Delaying the introduction of charges until 1 Jan 2025)"*
- *"Euro 4/5 diesel vehicles being used by blue badge holders (Delaying the introduction of charges until 1 Jan 2022)"*
- *"Euro 4/5 diesel vehicles being used by registered healthcare providers (Delaying the introduction of charges until 1 Jan 2022)"*

Note: See Appendix C for the full reporting of data.

9.4.2 Qualitative feedback

Some respondents felt that none of the current concessions would help businesses and the feedback suggested various concessions and exemptions could be used to help businesses impacted by Bath's proposed CAZ. Some respondents felt that all businesses should be exempt from charges and others felt that these exemptions should also extend to employees, customers and suppliers.

9.4.2.1 Concessions and exemptions suggested for vehicle types

Table 9-4 summarises the suggestions put forward for various concessions for different vehicle types.

Table 9-4: Concession and exemption suggestions for vehicle types by businesses

Vehicle type	Concession or exemption suggested/detail given by respondents
<i>Business related</i>	- Any work-related vehicle should be exempt.
<i>Hybrids and alternative fuelled vehicles</i>	- All hybrids should be exempt. - Biomethane fuelled vehicles should be exempt.
<i>Suppliers</i>	- Suppliers should have a concession/exemption. - Commercial delivery and service vehicles should be given a concession/exempt.
<i>Euro 4 and/or 5 diesel vehicles.</i>	- Euro 5 diesels should be exempt. - Diesel Euro 4/5 vehicles should have a longer phase in period to minimise financial impacts. - The Freight Transport Association called for a concession for HGV operators with Euro 5 vehicles.
<i>Taxis</i>	- Taxis should be exempt.
<i>Buses</i>	- Buses should be exempt.
<i>Private vehicles</i>	- Private vehicles including cars and motorhomes should be exempt.
<i>Other</i>	- Any vehicles with a tax band allowing payment of less than £100 a year should be free from the charge. - Vehicles with a smaller engine cc should be exempt. - Discounted rate for those on the borderline of the emission ratings. - Tractors should be exempt. - Trade vehicles should be exempt.

9.4.2.2 Concessions and exemptions suggested for groups

Table 9-5 summarises other concessions and exemptions, related to business in Bath.

Table 9-5: Concession and exemption suggestions for groups by businesses

Group	Concession or exemption suggested/detail given by respondents
<i>General comments</i>	- Businesses should be allowed to exempt one nominated vehicle from their fleet. - Businesses registered within Bath. - Businesses within 3 miles of the centre. - Businesses with a Bath postcode. - Some respondents felt an annual charge or permit or a weekly/monthly charge for businesses would be useful for businesses to help ease the administrative burden. - Have limited permits available for entering the zone for essential trips. - Stagger the implementation of charges. - Local businesses should be given longer to comply or a discounted charge, up to 5 years was suggested. - It would help local businesses if travel were free outside peak hours.

Group	Concession or exemption suggested/detail given by respondents
<p><i>Specific businesses/trades noted would benefit from a concession</i></p>	<ul style="list-style-type: none"> - It was suggested that any business owner paying business rates to B&NES or registered within Bath should be exempt, or that business rates should be reduced. <p>Many respondents suggested that small businesses should be exempt, specifically until 2025. Examples included:</p> <ul style="list-style-type: none"> - Courier services. - Small businesses using one vehicle. - Local retailers. - Market traders. - Funeral directors. - Charity/volunteer organisations. - School vehicles. - Driving schools/instructors. - Car garages offering MoTs and services etc. - Furniture removal firms. - Local building contractors. - Small independent retailers. - Any vehicle that is healthcare related including dentists. - Social services. - Self-employed/sole traders, including self-employed plumbers, builders, guest houses etc, especially where their vehicle may count as a HGV. Specifically, Euro 5 concession for tradesmen working on properties within the zone. - Retail outlets, including restaurants and cafes. - Service providers offering mobile services. - Businesses delivering services at/in people's homes, e.g. window cleaners. <p>Companies operating HGVs (should have a concession giving them longer to comply).</p> <ul style="list-style-type: none"> - Larger businesses also noted that concessions would assist them. For example, Royal Mail commented that whilst they are upgrading their fleet this would not be complete by 2021 and a concession would assist them.
<p><i>Staff/customers/specific groups related to business operation</i></p>	<ul style="list-style-type: none"> - Shoppers. - Patients at health establishments including the RUH and dentists. - Commuters or anyone travelling into or within the zone for work. - Service provider vehicles. - Delivery drivers/vehicles. - Suppliers to the NHS. - Low wage staff. - Customers who car share. - Those traveling for religious reasons. - Those with parking permits should get CAZ permits to enable traders to enter the zone. - Delivery firms/suppliers, specifically it was suggested odd and even days for small vans and trucks delivering in city centre. - Venues for leisure/recreation. - Vehicles delivering to local shops.
<p><i>Healthcare/care workers/volunteers</i></p>	<ul style="list-style-type: none"> - Mental health professionals. - NHS staff.

Group	Concession or exemption suggested/detail given by respondents
	<ul style="list-style-type: none"> - Carers. - Charity workers/volunteers including volunteer carers.
<i>Key workers</i>	<ul style="list-style-type: none"> - School workers. - Police, fire and medical staff travelling to work. - Education workers including extracurricular activity providers e.g. dance teachers. <ul style="list-style-type: none"> - Nursery workers. - Nannies and childminders.
<i>Other</i>	<ul style="list-style-type: none"> - A concession to enable HGVs to cross Bath. - Businesses that only need to enter the zone for an hour or less.

9.4.2.3 Comments against proposed concessions or the inclusion of additional concessions

Other comments from business respondents against the inclusion of concessions and exemptions:

- There should not be any concessions.
- Health should come before profit.
- Fewer concessions the better.

Some business respondents identified groups and vehicle types they felt should be charged:

- Visitors/tourists.
- Through traffic (not residents).
- Students.
- Only HGVS should be charged.

Some business respondents did not support some of the proposed concessions and exemptions including:

- Blue badge holders.
- Historic vehicles.
- Taxi drivers.
- Health workers.
- Buses taking people on educational trip.
- Some business respondents felt it was unfair to exempt tax exempt vehicles.

9.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Consider how residents be supported, for example through concessions or the provision of financial support schemes.
- Further consider the feasibility of offering a wider range of concessions or other mechanisms to mitigate the impact on vulnerable or low-income groups, businesses and for additional vehicle type or trip purposes.

- Further consider the feasibility of extending the concessions already proposed.

10. Comments Relating to how the CAZ may Influence Travel Behaviour

10.1 Overview

This Chapter reports:

- Comments made within Question 8 of the individuals and groups questionnaire and Question 11 of the business questionnaire. This asked respondents or businesses with non-compliant vehicles how they would respond to the proposed CAZ and how they would envisage their travel behaviour or vehicle choice changing.
- Comments made within the responses to other questions but that were identified as being specifically related to how people may respond to the proposed CAZ/what they would do if the zone is introduced in 2020.
- Comments on how people would respond to the charges mentioned in the letters and emails received (although fuller details of comments submitted by letter are included in Chapter 15).

Within this Chapter comments are summarised to provide an overview of the range of feedback received. Where a comment was made multiple times, this is noted only once. The ordering of comments does not imply any order, priority or weighting.

This Chapter first reports the feedback from individuals and groups, and then sets out the comments made by businesses.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath are reported in the individuals and groups section of this Chapter.

Overview of comments on travel behaviour

The feedback provided highlighted that the way in which people may react or respond to the proposed CAZ is complex. The questions asked required people to think ahead to 2021 and predict the way they would behave if a CAZ were implemented. Some respondents indicated that they would travel less by car in the zone, change their car to a compliant model or make more use of public transport, walking or cycling. In additions to these responses the most frequently suggested alternative response was to reduce the number of trips made into Bath city centre (for example by using other towns for shopping and leisure), followed by finding alternative routes to avoid the CAZ. This highlights the important need to consider the wide-ranging potential knock-on impacts of the proposed CAZ.

In the main part of the questionnaire, a relatively small number of individuals and businesses stated that they would expect to change their vehicle to a compliant model. It is likely that the majority of people answered this question without full knowledge of the financial support that is proposed to help people change their vehicle (as only very brief details of this were included in the consultation materials).

10.2 Context for consideration of these comments

The overall intention of the proposed charging zone is to encourage users/owners of non-compliant vehicles to change to lower emission models (which may not necessarily mean switching to a newer vehicle, as in many cases a change from a diesel to a comparable petrol model would lower emissions) or consider other alternative modes of travel. However, inevitably some people will choose to respond in other ways, for example by reducing the number of trips into the zone. The technical work supporting the OBC accounted for these issues, particularly in its assessment of economic impacts.

The package of measures proposed alongside the Class D CAZ targets a range of improvements for other modes to further encourage mode shift. This package also includes financial support to assist motorists in changing their vehicle. In many cases respondents to the consultation appear not to have been aware of these measures, or responses suggest that they were not confident they would materialise or be far reaching enough to be effective.

The comments received through the consultation help to build an understanding of the potential ways in which people may react to a Class D CAZ. However, it is important to acknowledge that it is inherently difficult to capture accurate predictions of future behaviour and it is likely that people's initial reaction to a proposal may differ from their actual behaviour at a later date.

10.3 Comments from individuals and groups

10.3.1 Quantitative feedback

Question 8 of the questionnaire for individuals and groups asked: *'If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020?'*

Of the 4872 respondents to this question:

- 7% stated that they would change to a compliant vehicle;
- 6% said that they would use more forms of public and active transport;
- 12% indicated that they would minimise driving through the zone and pay the charge;
- 4% said they would not change their behaviour and continue driving in the zone as normal;
- 11% were not sure what they would do; and
- 60% chose the 'other' category and stated a wide variety of ways in which they would respond, as summarised in the following Section.

However, this question was answered by driver respondents who had indicated in their responses to other questions that they would not be charged, and also non-drivers. Following data cleaning to remove these respondents, 3066 respondents remained within the dataset, representing drivers who would potentially be charged. Of these:

- 7% stated that they would change to a compliant vehicle;
- 4% said that they would use more forms of public and active transport;
- 11% indicated that they would minimise driving through the zone and pay the charge;
- 4% said they would not change their behaviour and continue driving in the zone as normal;
- 11% were not sure what they would do; and
- 64% chose the 'other' category and stated a wide variety of ways in which they would respond as summarised in the following Section.

This data was used to determine if respondent's travel behaviour was influenced by their home location, frequency of travel within the proposed zone and whether they expect to be charged in two years' time. This further analysis did not show any significant correlations, suggesting the people's response to the CAZ is not influenced by these factors. See Appendix C for the full reporting of data.

10.3.2 Qualitative feedback

As noted above the majority of respondents commented that they would respond to the CAZ in 'other' ways and went on to outline a wide range of different ways that they would respond to the CAZ. These are summarised in Table 10-1. The most frequent response was that people would alter their trips to avoid the zone, visit Bath less often or avoid Bath completely. Some noted that they would respond differently depending on the purpose of individual journeys.

In terms of positive ways in which people would respond, the following were mentioned:

- Respondents commented that they would walk, cycle, use the bus/Park and Ride or taxi more. However, some highlighted that for some journeys this is not possible – for example late at night, with heavy loads, or with young children/buggies.
- Some commented that they would consider purchasing a compliant vehicle.
- Some commented that switching to a compliant vehicle was something they would like to do/or were considering doing anyway. Others suggested they might swap one of their vehicles, or where they have two vehicles and one is compliant, use the compliant vehicle for trips into Bath.
- Some suggested that the CAZ would encourage them to consider a car club or car share.
- Others suggested they would consider making journeys by motorbike, as these are exempt.

Table 10-1: 'Other' reasons stated in Question 8.

'Other' response identified	Reasons/detail given
<i>Not visit Bath so often or avoid Bath</i>	<ul style="list-style-type: none"> - The most frequently mentioned 'other' response, was to avoid Bath or visit less often. Respondents said that they would visit the City Centre less/be more selective in visiting Bath, with the consequence of spending less money locally. Others said they would avoid the City Centre completely. - Some commented that Bath is currently their destination of choice and were disappointed that the proposed CAZ may mean they have to go elsewhere in the future. - Respondents felt that people avoiding Bath because of the CAZ would impact the viability of businesses in the city and that it may become a ghost town. <p><i>Trip types that people would look to limit/avoid</i></p> <ul style="list-style-type: none"> - Respondents commented on a range of circumstances in which they would look to reduce the number of trips they make within the zone. Some people said they would avoid Bath, whilst others stated that the CAZ would mean they would stop undertaking an activity completely, participate less or would look to travel instead to alternative destinations for activities such as: <ul style="list-style-type: none"> - Shopping for both occasional visits and regular supermarket visits, particularly for larger items, e.g. DIY, electrical. Respondents suggested that for trips not possible by bus or on foot they would travel elsewhere or would make more use of local shopping centres such as Moorland Road and Chelsea Road instead of going into the city centre. - Leisure and entertainment, including cinema, theatre, restaurants and parks (particularly where these would require a return trip after midnight).

'Other' response identified	Reasons/detail given
	<ul style="list-style-type: none"> - Clubs, lessons, evening classes, and community groups for both adults and children. - Sports, including the sports centre, gyms, classes and the rugby - Everyday trips such as to the hairdressers, recycling centre, bank, bus/train station and education. - Social or family visits. Some respondents commented on the impact this would have on them personally, for example in terms of isolation and loneliness. Others said they would arrange to meet friends and family elsewhere. - Onward travel. Respondents commented that they would start journeys elsewhere (to avoid paying the charge to access Bath Spa station) e.g. Bristol or Swindon. - Volunteering opportunities. - Religious visits. Respondents suggested they may change churches, to avoid travelling into the zone. - Medical trips. Respondents suggested they may look to change their doctor or dentist or would seek referrals to Bristol hospitals or centres outside of Bath. - Work. Respondents stated they would travel into Bath for work less often (for example by working at home or meeting clients elsewhere). - All non-essential trips. Respondents suggested they would be reluctant to visit Bath except for essential trips, such as for work or an emergency. - Car garages/petrol station. <p><i>Alternative destinations</i></p> <ul style="list-style-type: none"> - Frequently mentioned alternative destinations were Bristol, Cribbs Causeway, Longwell Green, Frome, Shepton Mallet, Radstock, Midsomer Norton, Keynsham, Yate, Trowbridge, Melksham, Chippenham, Wells, Street, Glastonbury, Bradford on Avon, Corsham, Swindon, Gloucester Quays and Salisbury. Respondents felt it would be cheaper to travel elsewhere than pay the proposed CAZ charges, particularly where other towns offer free or cheaper parking. - For supermarket shopping respondents stated that they would use alternative provision outside of the centre e.g. Keynsham, Combe Down, Melksham, Chippenham or Odd Down
<i>Find alternative routes around the zone</i>	<ul style="list-style-type: none"> - Respondents frequently stated that they would take alternative routes to avoid the proposed CAZ. - Respondents noted that the routes they would take would, in some cases, be 'back roads', rat runs and residential streets and perceived that this would lead to additional congestion and pollution in these areas. - Respondents also said that they would park elsewhere to avoid the CAZ. - It was noted that the longer routes people would take to avoid the zone would add to their mileage/fuel consumption and take longer. Nevertheless, respondents suggested they would rather do this than incur the charges in a non-compliant vehicle. - Respondents from Bath noted that they generally do not drive in/around the city and therefore their comments/issues related to journeys heading out of Bath. For these trips they would seek alternative routes to the A4/A36 and A367. - Some noted that they would find alternative routes as an interim measure until they were able to replace their non-compliant vehicle. Others, who stated that they did not want to change their vehicle, commented that their choice of alternative route would be a long-term change.

'Other' response identified	Reasons/detail given
	<ul style="list-style-type: none"> - Respondents suggested they would seek alternative routes to the RUH and to the Motorway (M4). - Some requested to see details of the alternative routes that vehicles were expected to take.
<i>Change job</i>	<ul style="list-style-type: none"> - Some respondents suggested that they would seek employment elsewhere (some outside of Bath, some within easier walking/bus distance). They stated that the proposed CAZ charges would make the commute expensive relative to (particularly lower wage) salary, particularly in addition to parking charges, and that seeking alternative routes/using public transport would not be possible or would add too much time to their commute. - Some felt that the CAZ would mean they would lose their job, as they would not be able to commute. - Others stated that they would work from alternative offices, work more at home, give up work, ask their employers to pay the additional £9 or seek early retirement. - Some noted that the CAZ would impact their journey to their children's nursery and that the extra charge incurred on this trip would mean they would need to consider leaving their job. - Shift workers finishing after midnight commented that the CAZ would particularly impact them. - Those requiring equipment for work stated that they would be unable to take their equipment with them on public transport and would prefer to seek work elsewhere.
<i>Move house</i>	<ul style="list-style-type: none"> - Respondents stated that they would consider moving away from Bath. They noted that Bath is already an expensive place to live, and that the additional CAZ charges for non-compliant vehicles would make staying in Bath financially unsustainable. - Some felt that the CAZ would impact on their quality of life, or disagreed with the principle and felt this would impact their decision to stay in Bath. Some expressed concern that property prices would be affected.
<i>Park outside the zone and walk or cycle</i>	<ul style="list-style-type: none"> - Respondents identified that one way they would respond to the CAZ would be to park or drop passengers off outside the zone and walk into the city centre (including to the station). Locations included Bear Flat, in the London Road area, and Lansdown. - Respondents living just within the CAZ boundary noted that they would try to park their vehicle further out to avoid the charge. - Some respondents noted that whilst they would park outside, this was not preferable due to concerns with carrying large amounts of shopping, safety at night and increasing congestion on the edges of the zone.
<i>Don't know</i>	<ul style="list-style-type: none"> - Some responded by stating that they did not know how they would respond to the proposed CAZ. They commented that they perceived the situation to be very difficult for them either due to their financial situation or personal circumstances. Some commented that they needed more time or information. Others felt that the Council should be providing them with more assistance.
<i>Not change</i>	<p>Some respondents commented that they would not make any changes to the way they travel.</p> <ul style="list-style-type: none"> - Some stated that they currently only use their car for longer journeys anyway, and that this would continue - Others stated that they already use the bus or walk or cycle as much as possible - Others felt that they had no choice but to continue to drive and pay the CAZ charges.

'Other' response identified	Reasons/detail given
	<ul style="list-style-type: none"> - Continue to drive, as alternative options are not available or feasible or because journeys are essential - Businesses with diesel vans commented that it would be very difficult for them to change, and that they may seek instead to pass the CAZ charge to their customers. - People driving for business stated that they would seek to pass the charges on to their employer. <p>Respondents reiterated concerns expressed elsewhere in the questionnaire, that the proposed CAZ would place an additional tax on low income groups.</p>
Other responses	<p>Other respondents stated that they would:</p> <ul style="list-style-type: none"> - Send children to a different school/nursery. - Live on reduced funds/struggle financially (after paying the charges) or cut back on other expenditure to fund the CAZ charges. - Not travel and become alienated or isolated. - Refuse to pay. - Adopt different strategies in different circumstances. - Challenge the Scheme/protest to MP/take Council to court. - Vote differently in next elections. - Find a loophole. - Scrap their current vehicle.

10.4 Comments relating to business in Bath

10.4.1 Quantitative feedback

Question 11 in the questionnaire for businesses asked, *'If your business has non-compliant vehicles, and none of the proposed exemptions or local concessions apply, what do you think your business or organisation would do if the zone is introduced in late 2020?'*

It should be noted that respondents picked more than one answer and therefore the percentages are based on the number of responses to the question (508) rather than number of respondents (372).

Of the 508 responses:

- 15% indicated that they would minimise driving through the zone and pay the charge.
- 13% stated that they were not sure how they would respond.
- 11% said they would continue driving in the zone as normal and pay the charge.
- 6% stated they would change to a compliant vehicle.
- 3% indicated that would look to change how employees travel.
- 2% would look to reorganise their fleet to ensure only compliant vehicles entered the zone.
- 50% stated they would change their travel behaviour in another way to those provided. These responses are summarised in Section 10.4.2.

The selection of multiple options restricted the further analysis possible on this dataset.

See Appendix C for the full reporting of data.

10.4.2 Qualitative feedback

Many business respondents commented on other ways businesses using non-compliant vehicles or impacted by having non-compliant vehicle drivers would respond to a CAZ. Comments included are shown in Table 10-2, below:

Table 10-2: Concerns about impact of the Scheme relating to businesses and business operations

Response	Reasons/detail given
<i>Not visit Bath so often/avoid Bath</i>	<ul style="list-style-type: none"> - Avoid Bath and look for clients elsewhere and avoid taking on new clients located within the zone. - Not accept jobs within the zone. - Look for suppliers outside the zone.
<i>Find alternative routes around the zone</i>	<ul style="list-style-type: none"> - Use alternative routes to avoid the zone, drive around the zone.
<i>Continue driving without changing vehicles</i>	<ul style="list-style-type: none"> - Already drive compliant vehicles. - Continue driving non-compliant vehicles and pass on the costs to customers. - Absorb the costs to minimise impacts on clients, continue to operate competitively and maintain current client and service levels.
<i>Continue driving but change vehicles</i>	<ul style="list-style-type: none"> - Upgrade fleet and continue to drive through the zone as normal or at considerable extra cost. - Fit filters to vehicles.
<i>Face financial difficulty</i>	<ul style="list-style-type: none"> - Lose business/customers. - Make redundancies. - Lose employees to companies outside of the zone/elsewhere. - Concern that passing costs on to customers would result in loss of business. - It was noted that LGV drivers would face particular hardship due to the expected lifespan of this vehicle type. There was particular concern for Euro 5 diesel van owners who could face a significant loss of investment.
<i>Move out of Bath/ close/ scale back business operations</i>	<ul style="list-style-type: none"> - Move business premises out of Bath. - Alter business or cease trading. Respondents expressed concern that the CAZ may mean that some companies can no longer afford to operate or would be affected and would cease trading. - It was suggested some businesses would look to relocate or avoid taking business in Bath. In particular, respondents who deliver services in people's homes expressed concern that they would not be able to afford to take work in the CAZ area. - Stop trading/close business/reduce the services they provide. - Change career.
<i>Unsure</i>	<ul style="list-style-type: none"> - Feel that they have no option. - Unsure what to do. - Alternatives such as walking and cycling not an option, especially for businesses which transport materials including tools etc. - Customers and suppliers are based inside the proposed CAZ, so avoidance is not an option.
<i>Other comments</i>	<ul style="list-style-type: none"> - Some businesses were concerned about their customers changing their travel behaviour resulting in a loss of business. - Concern about the impact for employees travelling to work, and suggestions that alternative modes of transport need improvement for employees to be able to use them. <p>Other respondents stated that they would:</p> <ul style="list-style-type: none"> - Increase their online presence.

Response	Reasons/detail given
	<ul style="list-style-type: none">- Organise demonstrations or protest against the Council.- Challenge legality of the Scheme.

10.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Explore further what measures and support, in particular financial support, can be offered to help encourage more people to change to a compliant vehicle.
- Similarly, establish the extent of financial support that can be offered to businesses to assist in their transition to lower emission vehicles.
- Explore further what can be done to minimise the risk of people reducing their visits to Bath and taking their custom to other towns. For example, by considering how to improve and promote public transport so that this is seen as an attractive alternative to accessing Bath by car.
- Ensure that the full extent of possible knock-on effects from drivers taking alternative routes to avoid the CAZ is fully understood. Responses indicate that many drivers of non-compliant vehicles may be prepared to travel further to avoid a charge.

11. Comments relating to supporting measures (to be delivered alongside the CAZ)

11.1 Overview

This Chapter reports:

- Comments made within Question 11 of the individuals and groups questionnaire and Question 14 of the business questionnaire. This asked for suggestions for other supporting measures that may help people and business adapt to the proposed charging zone. These responses are considered alongside Questions 9 and 10 of the individuals and groups questionnaire and Questions 12 and 13 of the business questionnaire.
- Comments made within the responses to other questions but that were identified as being specifically related to supporting measures.
- Comments on supporting measures mentioned in the letters and emails received (although fuller details of comments submitted by letter are included in Chapter 15).

Within this Chapter comments are summarised in order to give an overview of the range of feedback received. Where a comment was made multiple times, this is noted only once. It should be noted that the ordering of comments does not imply any order, priority or weighting.

Within the questionnaire responses there was some overlap between the issues raised as supporting measures (defined as measures that could be delivered alongside the proposed CAZ to help people adapt, or to mitigate impacts) and those suggested as alternative ways of tackling the air quality problem. For this reason, this Section should be read alongside Chapter 13.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath are reported in the individuals and groups section of this Chapter.

Overview of comments on supporting measures

Overall the feedback shows that there was general backing for the supporting measures proposed. However, many respondents called for these to be in place sooner. Many respondents urged the Council to consider more extensive supporting measures that would focus on offering additional incentives or options. In particular, there were many comments relating to the importance of developing the CAZ proposals within an overall transport plan for Bath, which should look at developing alternative modes of travel, delivering a step change in public transport and improving the Park and Ride. There was also support for packages offering financial support, to help people change to compliant vehicles.

A large number of comments related to the perceived need for larger scale intervention, including the provision of a ring road for Bath (specifically the A36-A46 link) and a Park and Ride on the eastern side of city. Some respondents felt these were needed in advance of any charging scheme to ensure that sufficient alternatives are available, whilst others thought they should be delivered alongside.

11.2 Context for consideration of these comments

The OBC included a number of measures that could be delivered alongside the proposed CAZ, either funded from Government funding or from revenue generated by the Scheme. These were detailed in the consultation materials which are replicated in Appendices A and B. This list of measures was selected following consideration of a long list of potential measures and was based on a process of sifting to determine whether each measure:

- Could contribute directly to making an air quality improvement.
- Would be appropriate for funding, either from Government funds available to this project or the revenue generated by the Scheme.
- Could mitigate the impacts of the Scheme, particularly for lower income households and businesses.
- Could be deliverable within the timescales of the project.
- Is not otherwise being considered through other work.

Other suggestions put forward through consultation will need to be considered against the same criteria. Many of the suggested supporting measures are outside the scope of this project for these reasons. In particular, large infrastructure schemes, such as the A36-A46 link and the east of Bath Park and Ride would not be deliverable within the required timescale and therefore cannot be considered as appropriate supporting measures. Similarly, measures such as extensive subsidies of public transport, would not be affordable within the funding available. Where appropriate, these comments will be shared with the relevant team within the Council.

11.3 Comments from individuals and groups

11.3.1 Quantitative feedback

Question 9 of the questionnaire for individuals and groups asked *'We're considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for you, your family or the people you represent?'* Respondents were asked to rank their top 4 priorities.

See Appendix B for a full list of the supporting measures presented to respondents for selection in this question.

The most frequently selected supported measures to be delivered from 2020 were:

- "Retrofitting high-emission buses with cleaner engines"
- "Financial support for residents and local businesses that need it most to upgrade from non-compliant cars"
- "Extended opening hours at the Park and Ride"
- "Anti-idling enforcement – to encourage vehicles to switch engines off when stationary"

Question 10 asked *'We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for you, your family or the group you represent? Please identify your top 3, ranked from 1 to 3 where 1 is most important.'*

The most frequently selected supported measures to be delivered from 2021 were:

- "Public transport improvements on key routes into the city and within the zone"
- "Additional improvements to walking and cycling routes"
- "Smaller park & ride sites along existing bus routes"
- "Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles"

See Appendix C for the full reporting of data.

11.3.2 Qualitative feedback

Question 11 asked respondents to provide details of any other measures that may help them or the group they represent adapt to the proposed CAZ. A range of additional suggestions were made. Respondents also commented generally on the perceived appropriateness of the supporting measures.

Whilst there was general support for a range of supporting measures, some respondents expressed concern that:

- The CAZ isn't addressing the main problem, or is the wrong solution, and therefore that the supporting measures are not the main issue.
- Many of the measures do not assist those living in Bath who are accessing services in the city or commuting out (i.e. Park and Ride improvements do not help residents). Respondents commented that the CAZ should not be implemented until reasonable alternatives are in place
- The supporting measures do not make up for not being able to use a car without a charge.
- Financial incentives are not enough for residents. Many do not want to, or feel the need to, change their vehicle or feel that changing their car is not an environmentally friendly option. For others, they simply need to use their car and the supporting measures will not assist them.
- Supporting measures should be in place before the Scheme comes in, not from 2021.
- It would be better to delay or phase in the charges.
- The funding for these measures would not materialise or concern that the measures would never be implemented.
- The revenue raised would be used for other purposes. Respondents were keen to see it reinvested in transport.
- The measures suggested do not address the main financial issues, which mean that many residents will face an increased cost of living and will not be able to afford the proposed charge.
- The measures do not help those commuting into Bath.
- The proposed supporting measures were seen as a waste of money/it was felt the money could be put to other better uses.
- Bath is not suited to walking and cycling because of its topography and that the supporting measures offered cannot change this.
- Public transport is not a feasible alternative for some groups.
- Implementing the measures related to buses relies on the bus companies, who may increase fares to cover costs.
- The topography of Bath is simply not suited to walking and cycling and that these modes are not suitable for some people/trips.
- Some felt that the proposed supporting measures should happen anyway, regardless of the CAZ.
- The supporting measures were small scale and would make little difference.
- There were practicalities around the use of electric vehicles.

11.3.2.1 Additional/alternative suggested supporting measures

A range of additional supporting measures were suggested and are shown in Table 11-1. By far the most frequently mentioned issue was improved public transport. Improvements to Park and Ride, walking, cycling, and a ring road were the next most frequently mentioned suggestions:

Table 11-1: Additional supporting measures suggested by individuals

Supporting measure suggested	Comments/detail given
<i>Improved bus service</i>	<p>The most common suggestion for measures required to support the implementation of the CAZ was improved public transport. The suggestions received were wide ranging, covering public transport operation, cost, ticketing and routing. Overall respondents called for a vastly improved public transport system delivered before 2021. The following provides a summary of the suggestions put forward:</p> <p><i>Ticketing/fares</i></p> <ul style="list-style-type: none"> - Make buses cheaper or free/subsidise bus fares using the CAZ revenue and ensure that bus travel is competitively priced compared to the alternatives, a suggestion backed by the <u>Bear Flat Association</u> and <u>Foxhill Residents Association</u>. - Various Parish and Town Councils and Residents Associations suggested better public transport is needed including <u>Bathampton Parish Council</u>, <u>Combe Hay Parish Council</u>, <u>High Littleton Parish Council</u>, <u>Bathwick Hill Residents Association</u>, <u>Camden Residents Association</u>, <u>Circus Area Residents Association</u> and <u>The Abbey Residents Association</u>. - <u>The Liberal Democrats</u> also emphasised the need for urgent action to expand public transport. - Particular mention of cheaper or free bus travel for those over 60 (bringing the age for free bus passes forward to 60), under 16s (recognising that children currently pay from age 5), families/those travelling in groups, those on lower incomes, for B&NES residents or on routes to the hospital or the supermarket. Respondents generally felt that the cost of the bus needs to be less than driving/parking or using the Park and Ride (particularly for families and groups). Many noted that for two or more people travelling together the bus tends to be more expensive than driving. - Make public transport like the Oyster system in London. - Simplify bus fares for example £1 for a journey in the centre. - Allow bus passes to be used 24/7. - Allow the Council to regulate bus fares and better, more regular bus services. - Subsidise more bus services that would not otherwise be commercially viable. - Make public transport free at the point of use (charge via taxes etc) - Ensure that bus fares are not increased as a result of the CAZ. - Allow tickets to be used across the various bus operators. - Provide non-compliant drivers with a bus pass. - Make buses to key destinations, such as the RUH, free. <p><i>Vehicles</i></p> <ul style="list-style-type: none"> - Use less polluting or electric buses – buses should lead the way. Operators should be supported to change/retrofit vehicles. - Use smaller buses/micro buses on some routes. - Ban higher emission diesel buses.

Supporting measure suggested	Comments/detail given
	<p><i>Routes</i></p> <ul style="list-style-type: none"> - Improve and introduce new bus routes, in particular circular/hopper routes around Bath (not just to and from the centre), east west routes and route to key destinations such as the rail station, the RUH and supermarkets and between Bath and rural areas and surrounding towns (both within B&NES and also adjoining areas). - More routes to suit commuters – particularly linking key employment sites (including the University and the hospital) to outlying towns. - Run combined commuter and school bus services. - Run more direct services to neighbouring towns, to cut journey times. - Better co-ordinate bus and train timetables. - Ensure services meet the needs of residents (who don't need to access the city, but instead need services that take them out of Bath to other places). <p><i>Frequency/hours of operation</i></p> <ul style="list-style-type: none"> - Put in measures to enhance bus reliability and reduce waiting times, including bus lanes, and improve journey times to ensure these compare favourably to travelling by car. - Extend operating hours of services, to run more buses later into the evening and earlier in the mornings (to be compatible with a working day) and on Sundays. - Run buses 24 hours (to match the hours of operation of the CAZ). - Make the buses more frequent. - Improve scheduling/timetabling of buses (so they don't all come at the same time) or to avoid buses running with very few passengers). - Encourage bus companies to run more services for events such as the Christmas markets, or rugby matches. <p><i>School buses</i></p> <ul style="list-style-type: none"> - Improve bus provision for schools (making it possible/feasible for more children to travel to school by bus) recognising that currently some short journey by bus take a long time/require a change in the city centre. - <u>Camden Residents Association</u> called for improved bus services to schools. <p><i>Passenger facilities</i></p> <ul style="list-style-type: none"> - Provide more real time information (rather than timetabled displays) - Improve the passenger experience (air conditioning on buses). <p><i>Other</i></p> <ul style="list-style-type: none"> - Introduce trams or tram/rail. - Make buses more accessible for buggies. - More bus shelters/seating. - Provide more bus stops. - Allow more competition between bus companies. - Raise pay to encourage more bus drivers. - Provide funding to help community transport ensure they can use clean vehicles. - <u>TravelWatch</u> and <u>Bath Bus Users</u> urged consideration of a Bus Quality Partnership.
<i>Improved Park and Ride</i>	<p>Park and Ride was frequently mentioned as an important initiative needed to support the CAZ and respondents identified a range of improvements that they felt needed to be in place before 2021 (albeit it is noted that residents highlighted that enhancements to the Park and Ride do not benefit them directly). Bath</p>

Supporting measure suggested	Comments/detail given
	<p>Preservation Trust commented that making effective use of Park and Ride is critical.</p> <p>The following suggestions were put forward:</p> <p><i>Fares</i></p> <ul style="list-style-type: none"> - Address charging – suggestions include reducing the price of /subsidising the cost of the Park and Ride, charging per car rather than per person or making the Park and Ride free, or free in the evenings to mirror the free/reduced price parking in the city centre car parks. - Make the Park and Ride cheaper for families/groups – the Park and Ride needs to be cheaper than driving. - Allow free parking at the Park and Ride sites. - Allow multiple journeys to/from the Park and Ride each day. - Allow Park and Ride tickets to be used on other bus services. - Encourage employers to pick up the cost of employees using Park and Ride. <p><i>Sites</i></p> <ul style="list-style-type: none"> - Provide additional Park and Ride facilities. - A wide range of groups expressed support for a Park and Ride to the east of Bath or disappointment that this was not part of the package of measures, including <u>FoBRA, PERA, Camden Residents Association, coach companies, Age UK, The Abbey Residents Association</u> and <u>Melksham Town Council</u>. - Also mention of the need for additional Park and Ride to the south west of Bath to cater for people coming into Bath from Bristol, Radstock and Peasedown St. John etc and off the A46, the A36 and at Limpley Stoke. - Work with adjoining authorities to deliver Park and Ride sites that cater for the needs of people coming into Bath from adjacent areas. - Expand existing Park and Ride sites as the CAZ will result in additional demand. - Provide Park and Walk car parks or parking hubs on the outskirts of the city. - Improve cycle routes to Park and Ride sites. - Provide more additional Park and Ride sites (as detailed as part of the proposed Scheme), particularly on the east side of Bath where there is currently no provision, There were requests to know where these proposed sites would be. <p><i>Hours of operation/frequency</i></p> <ul style="list-style-type: none"> - Extend the Park and Ride service to offer additional services in the early mornings and into the evenings, 7 days a week to support shift workers/evening leisure activities. - <u>Bath Chamber of Commerce, Bath Business Improvement District, FoBRA</u> and many of the local parish councils including <u>Camerton Parish Council, Heywood Parish Council, High Littleton Parish Council</u> and <u>The Abbey Residents Association</u> supported extended opening hours at the Park and Ride sites. - Run the Park and Ride as a 24-hour service to mirror the 24-hour CAZ charge. - Make the Park and Ride service more frequent – for example running every 10-15 minutes. - Allow secure overnight parking at the Park and Rides for visitors, this was also suggested by <u>The Abbey Residents Association</u>. - Allow residents to park in the Park and Ride overnight.

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - Provide an expanded service at peak times, for example in the summer and for the Christmas markets. <p><i>Routes and timetabling</i></p> <ul style="list-style-type: none"> - Make the Park and Ride buses express non-stop services. - Provide a Park and Ride that services a wider range of destinations, for example services that go directly to the RUH and the University. - Provide Park and Ride services which access rail stations. - Run Park and Ride services direct to schools, the <u>Bear Flat Association</u> suggested this. - Have all routes terminate at the Park and Ride. - There was some concern that there are too many University buses and that these should be rationalised. <p><i>Facilities</i></p> <ul style="list-style-type: none"> - Improve facilities at Park and Ride sites, including improved waiting areas for passengers and additional staff presence/security. - Make all Park and Ride sites suitable for motorhomes. - Provide electric vehicle charging points at the Park and Ride sites. - Provide increased Park and Ride capacity for events. - Remove height restrictions so all vehicles can use the Park and Ride. - Introduce taxis to the Park and Ride or taxi info, for those who are less able to use the bus.
<i>Improved rail service</i>	<p>The following suggestions were made in relation to rail services/provision:</p> <ul style="list-style-type: none"> - Address overcrowding on the Bristol to Bath train service. - Address high ticket prices and provide more evening services. - Improve rail services to the surrounding areas. - Reopen rail stations such as Corsham, Twerton, Limpley Stoke, Batheaston/Bathford/Bathampton and Saltford. <u>Saltford Parish Council</u> expressed the view that the CAZ justifies the reopening of Saltford Station. - Create a new parkway station. - Make it easier to take bikes on trains/more bikes on trains. - Deliver electrification of the railway/restrict use of diesel trains. - Improve parking at rail stations outside of Bath (e.g. Keynsham) to make rail travel more feasible from these locations. - Provide a pick/up drop off location for the station which is outside of the zone.
<i>Improved facilities for cycling</i>	<p>A range of suggestions were made in relation to cycling and there was general support for cycling from a range of groups. These included the following:</p> <p><i>Cycle routes/infrastructure</i></p>

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - Additional and improved continuous cycle routes and better cycle route planning around the City, but also between Bath and other urban areas. - More cycle lanes, segregated from traffic and in some cases segregated from pedestrians. These should cater for children and vulnerable cyclists. - Improve conditions for cyclists on main roads e.g. London Road. - Create new 'Bath Breathes' cycle lanes. Make sure these go right into the town centre. - Improve lighting of cycle paths, including the riverside routes and tow path. - Improve road surfaces and road maintenance to benefit cyclists. - Improve secure cycle parking, including provision for secure cycling outside people's homes (especially in terraced housing areas where many people have no outside storage), at Park and Ride sites and in the city centre. - Encourage park and cycle Schemes. - Enforce cycle lanes and no cycling rules in pedestrian areas. - Provide cycle paths on routes to schools. - Respondents noted that traffic management measures, including those to restrict heavy traffic in the city centre, would benefit cyclists. <p><i>Bike hire/purchase</i></p> <ul style="list-style-type: none"> - Incentivise people to buy bikes/provide subsidised bikes. <p><i>Cycling to school/work</i></p> <ul style="list-style-type: none"> - Promoting cycling more to schools, for example via escorted rides was suggested by <u>Foxhill Residents Association</u>. - Encourage employers to promote cycle to work schemes. <p><i>Electric bikes</i></p> <ul style="list-style-type: none"> - Electric bikes were recognised as being more suited to Bath's topography. Encourage electric bikes/introduce free/discounted hire Schemes for electric bikes. - Provide charging points for electric bikes (not just hire bikes). - Provide a grant system for e-bike purchase. <p><i>Other</i></p> <ul style="list-style-type: none"> - Enable buses to carry bikes. - Publish a cycling map highlighting safe cycle routes to key facilities/destinations - Provide cycle safety clubs/courses. - Consult with cycling groups. - Give cyclists free high visibility equipment. - Provide drop off points that are located a suitable walking distance from the city centre. - <u>The Camden Residents Association</u> supported a general improvement in provisions for cyclists.
<i>Improved facilities for walking</i>	<p>A range of suggestions were made in relation to walking. These included the following</p> <ul style="list-style-type: none"> - Improve/better maintain/make wider waking routes. - Provide more safe crossing points for pedestrians. - Give pedestrians priority at junctions. - Encourage walk and cycle share Schemes, to promote the social elements of walking and cycling. - Improve lighting of footways. - Improve the canal towpath.

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - Give pedestrians more priority at crossings. - Keep cyclists off pavements and address pavement parking. - Publish a walking map so people can easily see how long it takes to walk from place to place. - Provide more river crossings for pedestrians and cyclists. - Find a way of helping people walk and cycle up the hills (reference the recent suggestion for a cable car). - Make it safer to walk, for example with increased police presence. - Provide additional bridges or raised walkways linking areas of the city, without the need to cross roads. Locations suggested included at Cleveland Place and Widcombe. - Replace underpasses with safe surface crossings. - Respondents noted that traffic management measures, including those to reduce vehicle speeds, would benefit pedestrians.
<i>Financial support for residents/scrappage scheme</i>	<p>Respondents commented that a critical supporting measure would be to provide financial support to assist residents and businesses to help them change to lower emission vehicles. Financial support or a form of scrappage scheme was supported by many of the groups and organisations who commented, including the <u>Liberal Democrats</u>, <u>FoBRA</u>, <u>Cavendish Road Society and Residents Association</u>, <u>Foxhill Residents Association</u>, <u>Lansdown Crescent Association</u> and <u>The Abbey Residents Association</u> support the provision of financial assistance for residents to switch vehicles.</p> <ul style="list-style-type: none"> - Some commented that this was the only supporting measure that would really help them. Comments from others suggested that they did not appreciate that this was one of the measures included within the proposed Scheme - Financial support should be offered, in the form of grants, interest free or low interest loans, discounts or a scrappage Scheme to help people change to lower emission vehicles. There were requests for this to apply to everyone and should cover the whole cost of replacing or converting their vehicle and recognise that their current vehicle would likely be devalued by the Scheme. Some respondents requested that the Council buy them a car or buy their car off them. There was concern that the Scheme offered would not apply to all those who need it. - Some felt that helping people to change their vehicle should be done alongside the CAZ: others felt this would be a better alternative/should be done instead of charging. Others suggested that financial assistance would be a better use of funds than the other suggested supporting measures. - <u>Radstock Town Council</u> and <u>Bathwick Hill Residents Association</u> suggested a scrappage scheme could be introduced for residents. - Financial support helping people to change their vehicle should be directed specifically towards people: <ul style="list-style-type: none"> – Who live in/near the zone. – People who live outside of Bath but need to travel in/through Bath. – Everyone in B&NES, if funds allow. – On low incomes, including pensioners. – In vulnerable groups, including those with health conditions and disability or living in rural areas (for whom public transport options, walking or cycling are not feasible), key workers, the self-employed, small businesses and taxi drivers. – With diesel vehicles, in particular Euro 5 diesel.

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> – Who just about get by but do not claim benefits (there was concern that the packages offered would only be available to those on benefits). – To those who wish to swap to electric vehicles or wish to install electric charging points at home – Small businesses. – Who could retrofit their vehicle. <ul style="list-style-type: none"> - Respondents also commented that advice should be provided to assist with the decision to swap to a lower emission vehicle. - It was suggested that financial support should be available to everyone. - Some felt financial support should only be available to those swapping to an ultra-low emission vehicle. <p><i>Other forms of financial support</i></p> <ul style="list-style-type: none"> - Bus travel/Park and Ride should be subsidised or there should be council tax rebates. - Residents should be given subsidised parking to offset the CAZ charges. Offer those who need to change their vehicle a council tax break. - Allowing residents a number of free journeys per month, or allowing free travel in the evenings, was also suggested. - Lower business rates to help offset the CAZ charges. - Subsidising lease agreements with local garages. - Decrease road tax to offset the charges. - Increasing the central government grant for electric vehicles. - Offer concessions and further exemptions to residents (also see Chapter 9).
<i>Financial support for businesses</i>	<ul style="list-style-type: none"> - Reduce business rates. - Support businesses to change their vehicles. - Support local shops/businesses. - <u>The Road Haulage Association</u> called for financial support for small hauliers.

<p><i>Parking</i></p>	<p>Respondents noted that initiatives relating to parking management and provision offered potential to support and mitigate the impacts of the proposed CAZ. The feedback included the following suggestions:</p> <p><i>Residents parking</i></p> <ul style="list-style-type: none"> - Expand the residents' parking permit space scheme to prevent commuter car parking and ensure all areas adjacent to the CAZ are covered by the residents parking Scheme. Particular mention of Oldfield Park, Junction Road, Twerton, Larkhall, Lyncombe Vale area, Widcombe, Lambridge, Weston, Bathwick, Bear Flat, Camden, Fairfield Park, Snow Hill and Kensington Place. However, it was noted that in some areas residents parking has been discussed before and some residents are not in favour. - FoBRA commented that parking control may be needed to address issues on the boundary of the proposed CAZ and The Green Party felt that areas outside the CAZ should be covered by RPZs. - Some suggestions that residents parking should cover the whole of the city. - Extend the residents parking Scheme so that it covers Sundays and until 8pm. - Improve enforcement of residents parking. - Make the central zone parking residents only (it is currently pay and display and free after 7pm). - Restrict residents parking to one vehicle only. - Reflect the Scheme aim in the permit prices i.e. differential parking permit prices (increase the price for diesel vehicles). - Make residents parking permits free (recognising that residents would pay to drive non-compliant vehicles in the CAZ). <p><i>Other parking</i></p> <ul style="list-style-type: none"> - Provide more secure parking areas on the outskirts of the city/outside the CAZ. Some specifically felt this should be free of charge. These should be well linked to the city centre by good walking, cycling and public transport routes. - Improve and increase the parking provision at train stations used to commute into Bath. Specific mention of Keynsham and Holt. - Provide on-street electric vehicle charging points in residential areas, especially where people do not have driveways or garages. - There was some support for tightening parking restrictions and reducing parking provision in the city centre, for example by removing one-hour free spaces, taking visitors parking spaces out or making city centre parking more expensive. However, some respondents called for more city centre parking. - Introduce better parking for the RUH, for example with shuttle buses. - Introduce more parking for motorcycles. - Restrict on street parking where this results in congestion/delay for other vehicles. - Do not allow a new car park on the Recreation Ground. - Provide designated drop off/pick up points outside the CAZ. - Better enforce parking restrictions. <p><i>Parking charges</i></p> <ul style="list-style-type: none"> - Reduce parking charges/make parking free for low emission (electric/euro 6) vehicles and car sharers. - Make parking free for residents. - Implement a Workplace Parking Charge Scheme. - Request for a map showing parking provision outside of the zone.
<p><i>Bypass</i></p>	<p>Respondents highlighted the need for alternative routes and specifically for a bypass or improved ring road, in particular a link between the A36 and the A46.</p>

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - Some considered this to be something that should be implemented alongside the CAZ or that implementing a charging zone without alternative routes in place was inappropriate. - Others felt that if it were in place a CAZ would not be required. - <u>Bradford on Avon Town Council</u> suggested the Scheme should be delayed until an A46/A36 bypass is constructed. - Others supporting an A36/A46 link were <u>PERA, FoBRA, The Abbey Residents Association and North Bradley Parish Council.</u>
<i>School and student travel</i>	<p>School travel was one area where respondents felt supporting measures would be required. Typically, respondents identified the school run as one of the biggest factors contributing to congestion and air quality issues. Suggestions included:</p> <ul style="list-style-type: none"> - Do more to encourage parents to walk children to school, including walking buses or escorted cycling with paid members of (insured) staff. - Address rat-runs, so that traffic does not increase outside schools. - Encourage schools to use their minibuses for the school run. - Work with schools/the University to tackle this issue for example through school travel plans. - Introduce 'bus nannies' for children who are too young to travel by bus unaccompanied. - Prevent dropping off outside schools. - Create drop off points/school Park and Rides for students then catching the bus to school. - Ensure a proper system of bus transport is in place for secondary schools, including from outlying villages. - Subsidise school buses/or make bus travel free for school children and students. - Use the Park and Ride to take children to school. - Make cycling to school safer. - A range of comments considered issues outside the scope of this project, including the schools admissions process. - A range of issues were raised regarding the University and where students live and travel and the extent to which they bring cars into the City. - Make school buses electric. - Create car pool Schemes for the school run. - In the longer term, relocate schools so that they are not next to main roads. - Do more to stop students using their cars. - Develop joint plans with the University to promote clean air and greener transport and discourage students from bringing cars into the city. <p>There were also comments relating to the number of students/amount of student accommodation in the city centre and schools admissions policies.</p>
<i>Traffic management measures</i>	<p>The following comments related to traffic management Schemes, which could support the CAZ:</p> <p><i>Specific measures alongside the CAZ</i></p> <ul style="list-style-type: none"> - Strategies for addressing areas where residents are concerned that traffic will increase as a result of the CAZ – for example through Bathampton. - Additional measures to address through traffic in addition to/to help reinforce the benefits of a CAZ. <u>FoBRA</u> called for further consideration of traffic management approaches to address through traffic and noted particular attention is required to Queen Square and The Circus. However, it should

Supporting measure suggested	Comments/detail given
	<p>be noted that some organisations stated that they did not support FoBRA's views on traffic management.</p> <p><i>Wider measures to tackle congestion/traffic flow</i></p> <ul style="list-style-type: none"> - Free up the flow of traffic, for example: by improving the phasing of traffic lights, removing bus lanes, addressing the location of bus stops, and addressing bottlenecks caused by narrow lanes or parked cars to reduce stationary traffic and create clearways through the city. - Use traffic lights to hold traffic back and stagger the entry of traffic into the CAZ. - Replace traffic lights with roundabouts to better keep traffic moving. - Grade separation/flyovers at junctions. - Road improvements in outlying areas, to improve alternative routes including to the A350 at Chippenham and routes to the motorway from Bath and Bradford on Avon. - Some respondents felt that there was a need to address traffic being held up by cyclists. - Provide an alternative right of way to the Destructor Bridge. - Encourage refuse collections to take place at night, so as not to hold up traffic flow. <p><i>Restrict access</i></p> <ul style="list-style-type: none"> - Re-organise parts of the city, including one-way systems and bus lanes. - Make some parts of the city centre car free. - Make some parts of the city pedestrian only suggestions include Milsom Street, Upper Borough Walls, Broad Street and Pulteney Bridge. - Restrict access for HGVs in parts of the city centre including on London Road. <p><i>Traffic calming/speed</i></p> <ul style="list-style-type: none"> - Various comments about 20 mph limits, some suggesting that these should be removed, others that they should be better enforced. Similarly, some felt there should be more traffic calming, whilst others wanted to see traffic calming taken out to allow freer flow of traffic. - Restrict access to the city centre at certain times. - Introduce traffic calming on potential rat runs. <p><i>Other measures</i></p> <ul style="list-style-type: none"> - Enforce anti idling, as supported by the RAC and the Bear Flat Association. - Improve signage to ensure people take the best routes through the city. - Re-categorise roads/downgrade roads through residential areas. - Enforce parking and box junctions - Increase the toll on the Bathampton Toll Bridge (for example to £5) to discourage this being used as an alternative route. - A range of other suggestions for improvements to specific locations/junctions were mentioned but are too detailed to list here.

Supporting measure suggested	Comments/detail given
<i>Deliveries/HGVs</i>	<ul style="list-style-type: none"> - Set up collection/delivery 'last mile' sites outside of the CAZ to enable HGVs to off-load goods to smaller, cleaner vehicles for delivery across the city centre. Responses also included support for Plug-In Hybrid Electric Vehicles (PHEV) for deliveries as in London. - Restrict deliveries to specific times. Overnight deliveries were suggested by some respondents. - Introduce out of town collection points, to replace delivery of small parcels. - Better enforcement of weight limits (to help manage impacts of traffic avoiding the CAZ) and the introduction of new weight limits in key areas. - Keep large vehicles out of the city centre. - A weight limit on Cleveland Bridge was suggested. Re-route heavy vehicles and through traffic. Weight limits on other sensitive routes were also suggested. - Encourage companies to deliver large items which would otherwise require a car to transport. - Encourage HGVs not to enter Bath and to instead use the motorways.
<i>Support for electric vehicles</i>	<p>Respondents identified a range of measures that would encourage greater use of electric vehicles:</p> <ul style="list-style-type: none"> - Provide/permit infrastructure to allow residents to charge electric vehicles outside their homes. However, respondents recognised that many homes do not have driveways or garages, therefore provision of charging points would, for many, be very difficult/will be a bespoke solution. Some were sceptical that this would ever be possible. - Provide more electric charging points across the city. - Every public parking space in car parks/at the Park and Ride should have a charging point. - Allow electric vehicles to use bus lanes. - Encourage hire of electric vehicles. - Set up an electric/low emission car club. - Make all Council vehicles and buses electric. - Introduce electric scooters. - Support healthcare providers to provide electric vehicles for front line staff travelling around Bath to provide care in people's homes. - Provide electric charging points at taxi ranks. - Also encourage people to stop buying higher emission vehicles. <p>Some respondents were hesitant about encouraging electric vehicles, feeling that electric charging points would not be appropriate or that this was not the right solution (for example thinking that technology the pavements and that overall the focus should be on reducing the number of vehicles (not allowing them just because they are electric).</p>
<i>Car sharing/car clubs</i>	<ul style="list-style-type: none"> - Expand car clubs (including vans). Offer car club membership to residents with non-compliant vehicles. - Promote and incentivise car sharing. - Subsidise car club membership
<i>Taxis</i>	<ul style="list-style-type: none"> - Subsidise taxis/improve the taxi system. - Require all taxis to be low emission. -
<i>Coaches</i>	<ul style="list-style-type: none"> - Reduce/better manage tourist coaches in the city centre. - Require all tourist coaches to be electric.

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - Ensure all coaches drop at the Park and Rides, then transport tourists via electric buses. - Various comments relating to coaches – including requests to limit their number and for them to stop at the Park and Ride sites.
<i>Other suggestions</i>	<p>A range of other suggestions for additional supporting measures were mentioned. These include:</p> <ul style="list-style-type: none"> - Ensure all measures are in place before the CAZ is introduced. - Encourage employers to support working from home. - Promote car free days. - Establish a technology to retrofit cars. - Use river boats like buses. - Promote use of motorcycles and scooters, with clear routes and secure parking areas for these users. - Marketing of alternatives, to promote and encourage use. - Continue to publicise the damage caused by poor air quality to health. - Support use of hydrogen fuel, for example by providing filling stations. - Use revenue from the Scheme to fund healthcare initiatives. - Plant more trees. - Hire people to enforce the rules. - Take other action to actively reduce vehicle ownership across B&NES. - Encourage businesses/shops etc to locate outside the zone. - Prevent tour buses entering the city centre. - Provide older people who cannot use public transport with taxi vouchers. - Support community transport, for example by providing priority parking at health centres etc. - Demonstrate that the Council are making changes to show leadership. - Provide real time variable message displays showing information about air quality. When air quality is particularly bad these could discourage driving into the zone or encourage alternative modes. - Make it easier for people to understand which vehicles are lower emission, i.e. by introducing a clean vehicle label. - Work with Government to de-incentivise new purchase of diesel cars. - Relocate petrol stations. - Relocate key services/provide more services in residential areas. - Highlight the entry points to the zone clearly, so people are aware where they zone starts. - Subsidise electric taxis to/from supermarkets. - There were some calls for stricter measures to ensure all HGVs, taxis and buses are low emission. - Encourage businesses and shops to offer free delivery. - Provide more community transport to help people with non-compliant vehicles access appointments etc. This view was expressed by several rural <u>Parish Councils.</u> - Provide incentives to encourage people to adapt their heating systems. - Charge people to park at their place of work. - Restrict the amount of new development in the city centre. - Systems to police, discourage and enforce rat running and parking in adjacent areas.

Supporting measure suggested	Comments/detail given
	<ul style="list-style-type: none"> - The CAZ should be implemented alongside a comprehensive Bath Transport Plan. FoBRA emphasised this in their feedback and their view was supported by other resident's associations <p>A range of other ideas, not directly relevant to the project, were put forward by individuals and these are not all listed here.</p>

11.4 Comments relating to business in Bath

11.4.1 Quantitative feedback

Question 12 of the Questionnaire for Businesses asked *'We're considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for your business or organisation?'* Respondents were asked to rank their top 4 priorities.

See Appendix B for a full list of the supporting measures presented to respondents for selection in this question.

The most frequently selected supported measures to be delivered from 2020 were:

- *"Financial support for residents and local businesses that need it most to upgrade from non-compliant cars"*
- *"Financial support for local businesses to upgrade from non-compliant commercial vehicles"*
- *"Retrofitting high-emission buses with cleaner engines"*
- *"Extended opening hours at the Park and Ride"*

Question 13 asked *'We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for your business or organisation?'* Respondents were asked to rank their top 3 priorities.

The most frequently selected supported measures to be delivered from 2021 were:

- *"Public transport improvements on key routes into the city and within the zone"*
- *"Smaller park & ride sites along existing bus routes"*
- *"Additional improvements to walking and cycling routes"*

11.4.2 Qualitative feedback

A range of additional suggestions for supporting measures that would assist businesses were identified.

11.4.2.1 Other measures to support the business community

Some respondents felt that none of the other measures had been designed to support businesses. Suggestions and comments related to supporting measures tailored to businesses, are shown in Table 11-2, and included:

Table 11-2: Additional supporting measures suggested by businesses

	Comments/details given
<i>Business community</i>	<p>Some respondents felt that none of the other measures had been designed to support businesses. Suggestions and comments included:</p> <ul style="list-style-type: none"> - A buy back Scheme for non-compliant vehicles – so that businesses could use the money to purchase compliant vehicles. - Provision of funds for new vehicles. - Incentives to change for businesses such as rate rebates, rent concession, income tax/vehicle tax. - Financial aid for smaller businesses that have filters fitted to their vehicles. - Fitting of DPF filters to older diesel vehicles. - Informing visitors in advance of their stay, using Visit Bath and Stay in Bath to do this.
<i>Buses and wider public transport</i>	<p>Respondents suggested that alternatives to car travel in Bath were not sufficient to encourage their use, with many commenting that improved public transport was needed for a CAZ to be successful. Many comments echoed those already detailed in Section 11.3.2. Comments specifically related to business in Bath included:</p> <ul style="list-style-type: none"> - Public transport should be available 365 days a year, 24 hours a day, specifically to help support care workers and shift workers. - Allow care workers to use bus lanes.
<i>Park and Ride</i>	<p>Many business respondents mentioned Park and Ride as a measure to support and help customers and staff adapting to the CAZ. Suggestions included:</p> <ul style="list-style-type: none"> - Open 24 hours specifically to support shift workers and leisure trips to the theatre, and to support the hospitality industry. - Additional Park and Ride sites, specifically an Eastern Park and Ride, one in Chippenham and one in the London Road area. - Changing the charging system, specifically free travel and charging per vehicle not per person. - Increase security at Park and Ride sites. - Increase frequency of Park and Ride buses. - Have electric cars and bikes to hire in Park and Ride car parks as an alternative to bus travel.
<i>Rail</i>	<p>Suggestions relating to rail travel included:</p> <ul style="list-style-type: none"> - Implement a tube or tram system in Bath. - Open or reopen train stations, specifically in Corsham, Twerton, suburbs, commuting areas around Bath. - Improvements to current train services including schedules and increased carriages - Better promotion of train services into Bath.
<i>Cycling and walking</i>	<p>Some business respondents made suggestions relating to walking and cycling. It should be noted that there were calls for these improvements to begin now, not in 2021.</p> <p><i>Cycling</i></p> <ul style="list-style-type: none"> - Safe, designated well-lit cycleways would encourage an increased uptake in cycling. - Charging points and secure parking for electric bikes are needed. - Not supportive of electric cycle hire due to production and operation contributing to global warming. - Provide a cycle to work Scheme that includes electric bikes. <p><i>Walking</i></p> <ul style="list-style-type: none"> - There needs to be provision of walking routes that people want to use. - Walking routes should have improved lighting.

	Comments/details given
<i>Parking</i>	<ul style="list-style-type: none"> - Larger car parks should be provided outside Bath and the proposed CAZ boundary, specifically for commuters – with affordable ticket prices. - Reduce parking charges on market days for traders. - Offer a rebate similar to that at the leisure centre for car parking. - Offer parking permits for care companies; to allow them to park in residents parking zones. - Extend RPZ along whole of London Road. - Offer free or reduced parking fees for drivers of low emission vehicles. - Lower trade permit rates on parking permits. - Marked parking bays along Moorland road. - Parking permits for outside schools for use by those attending after school clubs.
<i>Bypass around Bath, A46/36 link</i>	<ul style="list-style-type: none"> - Some business respondents suggested the need for a bypass either alongside a CAZ or as an alternative.
<i>Traffic management</i>	<p>Some business respondents commented on traffic management measures. Comments included:</p> <ul style="list-style-type: none"> - Improve traffic flow across the city, for example by removing pedestrian crossing lights, having sensor operated traffic lights. - London Road should have two lanes for traffic. - Suggest a one-way traffic system around the city. - 20 mph zone, with a fine where the fees are donated to NHS. - Improve the junction off Freezing Hill onto the A420 – it is currently unsafe.
<i>Other</i>	<ul style="list-style-type: none"> - More electric charging points are needed - Petrol stations should have hydrogen fuel/gas refilling stations - A competitor to Enterprise car club is needed - Take B&NES offices out of Bath - Ban BBQs and garden fires - Fund replacement vehicles - Publicity campaign - Mobility credits – where drivers giving up older, higher emission diesel vehicles would receive mobility credits redeemable via public transport, car clubs or rental journeys - Petrol stations outside of the zone - A sunset clause for small and medium-sized businesses that allows them time to secure compliant vehicles for their operations.

11.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Restate the reasons why some of the larger infrastructure projects, such as the A36-A46 link and the east of Bath Park and Ride remain outside of the scope of this project.
- Consider the feasibility of other additional supporting measures to mitigate the impact of a Class D CAZ on residents and businesses, in particular low-income groups. Provide further details of the financial support package.
- Consider the extent to which this project can deliver improvements to bus services and Park and Ride, and in particular the feasibility of providing free or significantly subsidised services.

- Consider whether there is scope for other supporting measures, picking up on the ideas raised.
- Ensure that comments relating to other services, already being provided by the Council, are passed on to the relevant department.

12. Comments about specific groups who may be affected by the CAZ

12.1 Overview

This Chapter reports:

- Comments made within Question 12 of the individuals and groups questionnaire and Question 16 of the business questionnaire. This asked respondents to provide details of any groups of people or businesses who would be affected (either positively or negatively) by the introduction of the CAZ, due to particular circumstances.
- Comments made within the responses to other questions but that were identified as being specifically related to how the CAZ may impact specific groups.
- Comments on vulnerable groups made within the letters or emails received (although fuller details of comments submitted by letter are included in Chapter 15).

Within this Chapter comments are summarised to give an overview of the range of feedback received. Where a comment was made multiple times, this is noted only once. The ordering of comments does not imply any order, priority or weighting.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath are reported in the individuals and groups section of this Chapter.

Overview of comments on vulnerable groups

The feedback highlights that a wide range of different groups are potentially impacted by the CAZ. The most frequently mentioned concern related to the impact of the CAZ on lower income households. Respondents generally outlined reservations about the extent to which those on lower incomes would be able to either afford to change their vehicle or afford the CAZ charges. Impact on businesses was also highlighted frequently, both by individuals expressing general concern about economic issues, and by businesses themselves.

The feedback also highlights a range of ways in which those living in the zone, near the zone, or needing to travel into or through the zone, most notably for work or essential everyday activities, would be impacted. There was particular concern for impacts on key workers and on essential trips, including to hospital appointments and the supermarket.

Many of these issues are also highlighted in other Chapters and consideration of these issues are covered by the issues highlighted elsewhere.

12.2 Context for consideration of these comments

The social impacts of any charging zone are an important consideration within the Government's Clean Air Framework. This is picked up through the OBC via the preparation of a Distributional and Equalities Impact Assessment. This notes that the air quality benefits of a Class D CAZ would be felt by all neighbourhoods in Bath but acknowledges that adverse affordability and accessibility issues particularly impact low income groups, older people/minority groups and businesses. This analysis was taken into account in drafting the Equalities Impact Assessment and identifying the supporting measures, concessions and exemptions, which as far as other constraints would allow, were designed to help mitigate these impacts.

In responding to the consultation many people stated that they would be impacted in some way. However, in assessing these comments, and furthering understanding the potential impacts of the CAZ, consideration should be given specifically to those groups who may be disproportionately affected. This information then needs to be used to ensure that supporting measures, concessions and exemptions are targeted.

12.3 Comments from individuals and groups

12.3.1 Quantitative feedback

There were no closed questions on this topic, therefore all feedback was qualitative.

12.3.2 Qualitative feedback

The feedback showed people identified a range of groups that could be affected by the Scheme proposals.

12.3.2.1 Groups that would be positively affected

Whilst the majority of feedback focused on explaining concerns about groups that would be negatively affected by the proposed CAZ, some respondents made positive comments explaining that the CAZ may benefit them, or specific other groups. Some respondents said that everyone who lives in, works in or visits Bath would benefit. The groups mentioned were:

- Those with specific medical conditions, including asthma and other respiratory conditions. They commented that the proposed CAZ would benefit them/their family members and welcomed the introduction of the zone. Respondents commented that they had direct experience of pollution having an adverse impact on their medical conditions, in particular asthma.
- School children attending schools within the zone: in particular, there was support for the inclusion of Widcombe School and Oldfield Infant School.
- Everyone who breathes cleaner air in particular older people and children. Respondents felt that everyone who lives in, works in or visits Bath will benefit from cleaner air.
- People who live in areas of the city where air quality is currently poor.
- Visitors who will enjoy a more pleasant environment.
- People who walk and cycle.
- Children, due to the parks and open spaces being less exposed to pollution.

However, even where respondents identified positive health and environmental benefits, many also acknowledged that the situation was complex and that some groups may be more negatively affected than others.

12.3.2.2 Groups that would be negatively affected

Respondents identified a wide range of different groups that would be negatively impacted by the introduction of the proposed CAZ. Table 12-1 summarises these. The most frequently raised concerns were for low income groups. Residents (both within and outside the zone), older people, businesses and commuters were also mentioned frequently. The issues raised in this respect were very similar to those highlighted as requests for concessions. This Chapter should therefore be read alongside Chapter 9.

Table 12-1: Groups that would be negatively affected

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
<i>Anyone with a non-compliant vehicle</i>	<ul style="list-style-type: none"> - Respondents acknowledged that anyone with a non-compliant vehicle would be affected, regardless of income or demographics. - Respondents felt that low mileage, well looked after cars should not have to be scrapped. - Particular concern about the impact on people who have Euro 4 and 5 diesel cars and on those people who were actively encouraged to buy diesel in the past.
<i>Residents living within/near the proposed CAZ boundary</i>	<ul style="list-style-type: none"> - Respondents expressed strong concerns about the impact of the CAZ on anyone who lives in the proposed zone. Respondents expressed this in general terms, identifying an overarching concern and commenting that the zone would affect everyone, regardless of their socio-demographic status. - The CAZ was described as unfairly penalising all residents and adding to their already high cost of living and cost of high council tax and parking permits. Many felt that the CAZ would imply another tax on residents. - Some expressed concern about the impact on property prices. - Residents with non-compliant vehicles would be impacted every time they move their vehicle and they have no choice about this. - The proposed boundary, through its inclusion of the routes around Bath, means that everyone is affected as there are few other options. - The annual cost of the charge to residents was considered extremely high and, for many, unaffordable. - The cost of replacing their vehicle was also seen to disadvantage residents. - It was not considered appropriate that residents should be treated in the same way as tourists, through traffic and lorry drivers. - It was noted that many residents rely on their vehicle. - Residents noted that they typically already limit the use of their vehicles within the city centre but nevertheless do make important trips by car, for example to socialise or to do weekly shopping - Residents noted that buses do not run to all the destinations they wish to visit on their trips out of the city. - Residents living very close to the edge of the zone were concerned they would incur a charge in a non-compliant vehicle for clipping the edge of the zone when driving out of the city. - Residents will be disadvantaged because their visitors may incur the CAZ charge/may visit less often if so. - Whilst others travelling in the zone have alternative options it was felt that residents cannot avoid this, and therefore should have some form of concession/exemption. - Residents were disappointed that the concessions and exemptions offered did not assist them directly. - Residents who felt they would not be eligible for financial support felt they would be disadvantaged because they still cannot afford to replace their vehicle. - The supporting measures offered were considered unhelpful to residents. - There was concern that people visiting residents would be charged. - Concern that the CAZ would increase pressure for parking in adjacent areas. - Concern that the main supermarkets and petrol stations are in the proposed CAZ. - Concern that people living in the zone would have CAZ charges passed on to them by tradespeople or a lesser choice of tradespeople if some prefer not to work in the zone because of the charge they would incur with a non-compliant vehicle. - Concern that the CAZ would 'price people out' of the city.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Concern that only those on higher incomes, who are more likely to have newer cars, would benefit and that everyone else would be disadvantaged. - Some residents within the zone supported the CAZ but wished for it not to penalise residents. - Some commented that residents need more time to adapt. - Many respondents who expressed concern for those that live in the CAZ or need to access facilities in the CAZ also went on to identify specific groups who would be most affected. These are considered separately below. - People living on the edge of the zone perceived that they would be disadvantaged by it, but not see any benefits. - Residents who live on the edge of the zone and would only pass through it for a short distance but would be charged in a non-compliant vehicle. - There was concern that residents would see disbenefits in terms of reduced services and facilities in the city centre, as the CAZ would mean more shops etc would struggle due to reduced footfall. - Concern that costs would be passed to residents by tradespeople or that tradespeople would not want to work in the area, therefore disadvantaging residents.
<i>People living outside the proposed CAZ boundary</i>	<ul style="list-style-type: none"> - Respondents expressed concern that anyone passing through the zone would be affected, regardless of their socio-demographic status. - Concern that people living outside Bath, particularly those in rural areas that rely on Bath for services, will be affected because public transport options in these areas are poor. Some routes do not have a Park and Ride, journey times are longer, and the topography does not lend itself to cycling. - Concern that the financial help offered as part of the proposals would not apply to everyone - Concern that anyone needing to travel east-west or north-south with a non-compliant vehicle would be impacted. - People accessing the motorway. - People living outside Bath but reliant upon facilities in Bath. - People whose choice of shops/entertainment may be limited, due to the zone. - Concern that areas outside the zone, but within Bath/adjacent to the zone, would experience knock on effects; such as rat running, pressure for parking (where residents parking is not already in place) and increased pollution. Particular concern in relation to the Great Pulteney Street/Henrietta Road area, Bathwick, Sydney Place area, Widcombe, Bear Flat, Batheaston, Bathampton (particularly the toll bridge), Bannerdown, Charlcombe, Larkhall, Lansdown, Lyncombe Vale area, Odd Down, South Down, Combe Down, Claverton, Oldfield Park, Hayesfield Park, Twerton, Rush Hill, Greenway Lane, Moorland Road, Brougham Hayes, Weston and Lansdown, Southdown. Also see Chapter 14. - There was concern about traffic increasing outside schools outside of the proposed zone including Bathampton St Saviours and St Johns and in Combe Down, Odd Down and Southdown and King Edwards. - Concern that the towns and villages outside of Bath would also experience knock on impacts including Hinton Charterhouse, Bradford-on-Avon, South Wraxhall, Limpley Stoke, Winsley, Hilperton, Wingfield, Chippenham, Westbury, the A350 and villages on routes to the A350 and in South Gloucestershire in Beach, Upton Cheyney and Bitton. Also see Chapter 14. - Concern about the wider impact on the natural environment, including toad migration. - Respondents provided detailed responses about specific routes they believed would be adversely affected.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Concern that the CAZ charges will be passed on to residents by local businesses. - There was concern that people with non-compliant vehicles would be charged for visiting friends and family who live within the zone/where a trip through the zone is needed.
<i>People who cannot afford the charges/to change their vehicle</i>	<ul style="list-style-type: none"> - Respondents outlined a wide range of personal circumstances, explaining how the proposed CAZ would impact on them. Many outlined the specifics of their financial situation to demonstrate that they cannot afford to change their vehicle. People made the point that many ordinary people with ordinary vehicles (who therefore don't fall into any criteria for a concession) don't want to or can't afford to change their vehicle. People commented that the CAZ would force them to change their vehicle.
<i>Low-middle income groups</i>	<ul style="list-style-type: none"> - There was general concern that people on lower to middle incomes are affected most by the proposal. Respondents made the point that for many people a car is one of their biggest expenditures and that if people could afford newer cars they would already have them. Respondents felt the Scheme favours those with more disposable income and marginalises or disproportionately affects those who can least afford to change their vehicle. There was concern that the proposals would have a disproportional impact on lower income groups and would increase the rich-poor divide in the city. Respondents referred to the proposal as a 'tax on the poor'. - <u>Keynsham Town Council, Combe Hay Parish Council and Westbury Town Council</u> expressed concern about the impact on low-income residents. - The charge will affect those who are already struggling financially/already on a budget/just about managing. These people will have to cut back in other areas as a result of the CAZ. - People living in the zone on low-middle incomes. - People who do not feel they can afford to change their car, therefore feel they have no option but to pay the charge. - A £9 a day charge for someone on a low income who has to drive and has a non-compliant vehicle was considered to be a life changing cost. - Particular low-income groups mentioned included unemployed, those on benefits, older people/pensioners, families, single parents, key workers, those in low income jobs, those on the national living wage, the self-employed, low income families, people in social housing, students and younger people, including young professionals on lower wages and those living outside of Bath where travel options are more limited. - Those in lower paid jobs in the city centre, or that require travel across the city centre for work, were identified as being particularly affected, with specific mention of hospital workers, care workers, teachers/teaching assistants, public sector workers and key workers. - Those that rely already on taxis and public transport (because there is concern that fares will increase). - Respondents highlighted areas of the district where low income groups may be particularly affected, including Twerton, Snowhill, Radstock, Paulton and Whiteway and areas with higher concentrations of social housing. - It was felt that people driving larger cars should be penalised rather than people on low incomes, as they take up more road space and are inefficient for small journeys. - Concern that not enough analysis has been undertaken to understand the impact on lower income groups. - There was concern that if residents were offered loans to help them change their car, they would be taking on debt that they cannot afford to repay.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Concern that those who can afford newer cars should be penalised less (no CAZ charge, lower parking charges etc). - Concern that lower income groups are less likely to speak out/be heard. - It was noted that the CAZ charge is more than one hours wage for a low wage earner.
<i>Shift workers</i>	<ul style="list-style-type: none"> - Those who work shifts finishing after midnight, will have to pay the charge twice (including hospital workers, paramedics and firefighters). <u>Radstock Town Council</u> and <u>Westbury Town Council</u> expressed concern about shift workers especially and also night workers. <u>Keynsham Town Council</u> and <u>Bitton Parish Council</u> showed concern generally for shift workers. - It was suggested that where people currently work short shifts, the need to pay the CAZ charge may make these uneconomic.
<i>People travelling into/through Bath for work</i>	<ul style="list-style-type: none"> - Respondents commented that the CAZ will affect ordinary working people (not just minority or disadvantaged groups). Respondents commented that a £45/week charge for anyone with a non-compliant car is unaffordable for many workers and that for many people buses, Park and Ride, walking and cycling are not feasible options. - Some respondents commented that they would look for work elsewhere, to avoid the additional cost/inconvenience of the CAZ. - People who work in Bath but live outside with no alternative transport options will be particularly affected, especially those who have to pay to park (noting that parking charges are £15/day). Those who live too far away for public transport/walking/cycling to be an option or who travel outside of the hours of operation of most bus services. - People who live in the zone and travel outside of Bath to work. - People who have to travel through Bath for work, including people who need to access the motorway and route through Bath on the A4 or A36. Some of these people would travel for a very short time/distance in the zone but would still incur the charge. There are few alternative routes. - Particular concern about the impact of the cost of the charges or of changing vehicle on key workers, including teachers, hospital workers (including at both the RUH and St Martin's), and lower income jobs (i.e. waitresses, artists, apprentices), particularly where these roles require travel outside of the hours of public transport operation. - People who require their vehicle for work/as part of their job, particular mention of GPs, health care providers, NHS staff, social workers, delivery drivers, estate agents, landlords accessing properties, child minders, dog walkers, electricians, plumbers, window cleaners, outreach workers and anyone who has to travel in/through the zone to get to clients. - Anyone who has to park in the city centre for work or onward travel, including commuters who park at the railway station. - Anyone who already pays to park. Respondents felt they already pay a high price for parking. - Anyone for whom the additional cost would make their job uneconomical. - People who drive vehicles provided by their company which are non-compliant (where they have no choice but would not be able to pass on the charges). - Those who are able to take public transport as an alternative but may face a longer commute as a result. - People who need a car to take children to nursery/school before work. - Anyone who needs to carry equipment. - Anyone who delivers services in people's homes (including delivery drivers, tradespeople and social care providers).

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - People who start work early/late or work anti-social hours, when public transport services and the Park and Ride are not feasible options and when walking or cycling would not be safe e.g. emergency service workers, cleaners, supermarket workers, and restaurant and hotel workers. - People who travel by train to work, but who arrive at the station/arrive home in the evenings when the Park and Ride is not operating. - People who commute long distances by train, where the additional time to get to the station by bus or Park and Ride would extend their journey too much. - People who work bank holidays and Sundays, when there are fewer buses. - Respondents felt that the proposed CAZ would make it difficult for companies/organisations to recruit or retain staff, due to the additional cost potentially faced by employees. - People using taxis for work (due to concerns that fares will increase). - Any workers who avoid the zone and are then affected by an increase in travel time. - Families where more than one person needs to travel for work but where they cannot travel together and therefore with non-compliant vehicles would pay the charge twice. - Particularly people commuting into Bath from the east, given that there is no Park and Ride. - Many of the comments relating to work trips were linked to comments on affordability; these comments therefore need to be considered in the context of those above.
Parents, children, families	<p><i>General issues affecting families</i></p> <ul style="list-style-type: none"> - Ordinary families (not just lower income families) living in the zone, because it would affect every aspect of their lives. - Families because the cost of multiple bus fares is high. - Parents with young children who would struggle to use alternative modes, e.g. with small children in buggies that are difficult to take on buses or where children are too small to walk or cycle (particularly considering that much of Bath is hilly). - Larger families who require larger cars. It was noted that there is limited choice of large family (SUV type) cars in petrol models. - Parents taking children to appointments. - Concern that the CAZ could isolate 'stay at home' parents. - Concern that the charge will affect ability of parents to take children to extra curricula activities. - Families that may not classify as low income but are only just making ends meet. <p><i>School run issues</i></p> <ul style="list-style-type: none"> - People who currently drive within the zone to collect their children from school, in particular from schools located within the zone. - Parents/pupils where public transport, walking or cycling is not a feasible option for the journey to school, particularly for those in the rural areas outside of Bath or at secondary schools (which are typically further from home). - Families who live outside of Bath, but where there are no bus services to take their children to schools within the CAZ. - People who feel they have no option but to drive their children to school because they then have to carry on to work/be at work early. - School trips (fear that the extra charge would be passed on to parents). - Families whose journey to school by alternative modes would take longer.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Families where children have disabilities (but where they do not have a blue badge) or issues that mean they need to be dropped off at school/which means they cannot use public transport, walk or cycle. - Children who need a lift on days when they would otherwise be walking in the dark. - People who have already made school choices, where public transport is not available (but may have made different choices had they known about the proposed CAZ), or anyone who feels their choice of school would be constrained by the CAZ. - Families who cannot afford the daily cost of a bus to school. - Grandparents etc picking children up from school. - Families who could not get a place at their local school, therefore have to drive to one further away. - Parents who drop children at the bus stop, so that they can take the bus to school. - Parents who already car share to take children to school but have non-compliant vehicles. - Families where children are being allocated schools across the city, due to a lack of school places. <p><i>Activities/leisure</i></p> <ul style="list-style-type: none"> - People who take children (including babies) to clubs/activities/sports/youth groups where the additional charge would make activities unaffordable. Concern that the CAZ would discourage participation in sports and other social activities. - Families accessing the city centre parks. <p><i>Working parents</i></p> <ul style="list-style-type: none"> - Parents who have to get to work quickly after dropping at school/nursery. - Parents with babies, where travelling by bus is not ideal. Parents who need access to a car in case of emergencies with children. - Some concern that the CAZ is a tax on working parents who already pay a high price for child care. - <u>Foxhill Residents Association</u> was concerned about the impact the CAZ could have on parents. <p><i>Issues relating to the knock-on effects of the CAZ</i></p> <ul style="list-style-type: none"> - Children attending schools or walking to school in areas outside the CAZ that people fear will be used as rat runs or where traffic and pollution will increase – particular mention of routes to St Mary's School in Weston, Weston All Saints School, Bathampton Primary, Bathwick St Mary's School (and the route across the toll bridge), Widcombe, Combe Down, The Paragon School, Hayesfield, Oldfield Infants and Juniors, Combe Down Primary School, Prior Park College, Monkton Prep and Ralph Allen School, St Gregory's. - Children attending nurseries outside the zone, including Oldfield nursery, Camden road/Bennets Lane area and Little Willows nursery on the A36. - Some respondents acknowledged that children would benefit from the zone, due to cleaner air.
<i>Students and young people</i>	<ul style="list-style-type: none"> - Younger people or students, with limited income, who cannot afford to change their vehicle. - Younger people who are already struggling with expensive mortgages etc. - New drivers. - Concern that rising costs would drive young people in the first stages of their careers out of the city. - Students who would be affected if bus fares were to rise. - University students who need cars for placement work.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Students accessing the college/University. - Young people on starter salaries.
<i>Carers, volunteers and health workers</i>	<ul style="list-style-type: none"> - People caring for family members, including the elderly, unwell and those with disabilities who need their car to visit those requiring care. - Healthcare providers/doctors/district nurses/midwives/care workers/support workers who support people in their own homes. - <u>Foxhill Residents Association</u> and <u>Radstock Town Council</u> expressed concern about the impacts on carers particularly. - Both <u>Keynsham Town Council</u> and <u>Westfield Parish Council</u> were concerned about the potential impact on hospital workers. - Charities who will find it more difficult to recruit and retain volunteers who drive their own cars. - People who volunteer for charities and clubs like Scouts, transport charities, community transport providers, volunteer drivers, street pastors, mentors and people who benefit from their services. - Care homes taking residents out in mini buses. - Individuals who receive home care, who may find it more difficult to employ carers, or be asked to pay more to cover the charges. - Carers who take people for regular doctor or hospital appointments, particularly where the person requiring assistance does not have a blue badge. - People who transport someone with a Blue Badge but would need to make a journey through the zone without that person in the car.
<i>Older people</i>	<ul style="list-style-type: none"> - Respondents expressed concern about the impact on older residents who may not be able to walk/for whom public transport (or walking to the bus stop), walking and cycling are not feasible alternatives. - Older residents who were seen as more likely to have low incomes/less able to afford to change their vehicle/more likely to own a non-compliant vehicle. It was noted that these people bought diesel vehicles because they were encouraged to do so. They will not have budgeted for a new car and will not have the opportunity to save or earn. - Pensioners whose income is slightly above any potential threshold for financial support. - Older residents who would be less comfortable or confident driving an electric vehicle. - Older residents felt that they were particularly impacted where they have a non-compliant vehicle which they consider to be their last/had no plans to change/has passed all of its MoTs or where they are unsure how many more years they may be able to drive for - Older residents with health issues, but who do not qualify for a blue badge. - Older people whose friends/relatives/carers may visit less, or take them out less, due to the charges. - Older people who receive home care/rely on carers where their carers may incur the CAZ charge (leaving them with less care/fewer visits/less choice of carers) or where they may pass the charges on. - Older people attending more frequent hospital or doctors' appointments.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Older people whose independence may be compromised if they have a non-compliant car and cannot afford the CAZ charge leading to increased social isolation. - Active older people who take on childcare responsibilities etc and need to travel around the city. - Older residents who visit day centres (due to a concern that operators will charge more, because of the charges imposed on non-compliant minibuses). - Older residents who may have to pay more for taxis (due to a concern that fares will increase) or may face reduced bus services (if bus operators cannot afford to upgrade their fleet). - Older people who do not have access to the internet. - Older people who do not feel safe walking at night, so rely on the car for travel to social activities. - Older people who will be affected by increased traffic and pollution in areas outside the CAZ boundary due to the re-routing of traffic and who would benefit if the CAZ boundary were redrawn. - Pensioners on state pension – 2 trips into the CAZ per week would be over 11% of their income. - <u>Keynsham Town Council</u> and <u>South Stoke and Midford Parish Council</u> both expressed concerns for the impact on elderly residents.
<i>People with disabilities/ health issues</i>	<ul style="list-style-type: none"> - People who have a disability/health condition or cannot walk or use public transport but do not have a blue badge. Particular mention of people with mental or hidden conditions, rather than physical disabilities/issues (including autism and anxiety). - Respondents commented that people with disabilities will be particularly affected (as often driving is their only option) and that often these groups of people are on low incomes (although it was noted that disability is not always an indication of income). - People with mobility issues for whom travelling by bus or getting to the bus stop, walking or cycling is either very difficult or impossible, who therefore rely on driving for their independence. - For people with disabilities, it may be more difficult to find a compliant adapted car. - People who are attending medical appointments etc either within the zone or that require travelling through the zone. For many, public transport options are not appropriate, in particular where people are unwell or receiving treatment. - Blue badge holders, who do not have a tax-exempt vehicle (as the concession proposed is only until 2022). - Those who care for people with disabilities will be affected and these people may, as a result receive less visits/care, and this may result in people becoming more house bound. - Older people who rely on carers (where the CAZ charges may result in them having to pay more for their care). - People who rely on getting out and about to combat depression etc. Concern that if people do not travel this will affect loneliness and isolation. - Those who need to transport people with disabilities. - Disabled people who rely on buses and taxis (due to a fear that fares will increase, or the services will not be available in Bath). - People with temporary disability or mobility impairment. - People with disabilities that need to carry medical equipment.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - There was concern about how the concession for blue badge holders would work when the person is taken in multiple vehicles. - Concern that blue badge holders will find parking more difficult on the edge of the CAZ due to increased pressure for parking. - <u>Foxhill Residents Association</u> expressed concerns for the impact on disabled residents.
<i>Local businesses (also see Section 12.4.2)</i>	<p>Respondents expressed general concern about the impact of the CAZ on businesses, the economy and vitality of the city centre and commented that businesses should be supported, rather than have additional costs imposed on them. There was concern that any improvements in air quality would be at the risk of businesses in Bath. There was concern that some businesses would struggle/close/need to make redundancies. It was felt that the CAZ could impact recruitment and ability to retain staff.</p>
<i>Tourists/tourist industry</i>	<ul style="list-style-type: none"> - Respondents expressed concern that the CAZ will discourage tourists from visiting Bath. - It was noted that tour operators operating non-compliant coaches may not visit the city or that if the CAZ charges were passed to customers this may discourage visitors. - Tourists who do not speak English may find it difficult to pay the charge/be fined for not paying. - The charge would encourage tourists to seek holiday accommodation elsewhere. The combination of the CAZ cost plus the cost of parking was considered to potentially discourage visitors. - Some felt that a reduction in tourist numbers would be beneficial, others recognised this would have a detrimental economic impact. - There was some concern that tourists may be put off due to not understanding the system.
<i>People undertaking leisure/recreation activities</i>	<ul style="list-style-type: none"> - Particular impacts identified for people attending or running groups, classes, activities, clubs, or lessons (adults and children) particularly evening classes, where public transport options are limited or not appropriate. It was noted that some groups already struggle with membership due to difficulties parking and there was concern that the CAZ may further reduce membership. Paying the £9 charge for a non-compliant vehicle would make attendance at many classes too expensive. - Anyone attending social events or entertainment in the city, including the theatre, cinema, art galleries, museums and restaurants, particularly during evenings and weekends, may be affected. - Clubs and groups operating minibuses (e.g. Scouts) would face additional charges. - Shoppers would face additional charges and may be discouraged from coming into Bath/go elsewhere instead. - People visiting the parks would be affected, with particular mention of Victoria Park. - Anyone using the leisure centre, swimming pools, gyms, library would be affected, and potentially the additional cost for a non-compliant vehicle would discourage people accessing these facilities. - Anyone who is not comfortable or does not feel safe walking, cycling or using public transport after a night out. Particular mention of women and personal safety. Concern that more people will walk home from activities at night when it is not safe to do so. - Bath Rugby fans. - People accessing the library.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - People visiting Bath for a day out. - People attending social and support groups/centres. - Anyone socialising with or visiting friends and family. There was concern that if the charge discourages social interaction people will become lonely and isolated. - Balloon flights – operators will look for launch sites where the charge does not apply. - People with specific vehicles related to their hobbies, i.e. horseboxes and campervans. - Discovery card holders who would face an additional charge to come into the city. - Concern that if the CAZ affects social activities it will impact psychological wellbeing. - People keeping allotments. - Concern over the cultural impact on Bath and people accessing museums etc. - Anyone collecting visitors from the station. - People using campervans for occasional trips. - Musicians working in the city centre.
<i>People undertaking personal/ necessary journeys</i>	<p>Respondents' identified a range of specific trips that would be affected. There was particular mention of impact on trips relating to:</p> <ul style="list-style-type: none"> - Supermarket shopping. - Petrol stations. - Recycling centre. There were concerns that there would be an increase in fly tipping as a result of people not wanting to pay the charge to access the recycling centre. - General shopping/people wanting to shop locally. - Superstores/DIY stores. - Hospital (RUH, Minerals Hospital, Bath Circle and St Martin's) noting that many patients travel in from the wider area. Access to the RUH from Wiltshire was particularly noted. Some respondents stated that they would call an ambulance rather than pay the CAZ charge. Access to the hospital was identified as a concern by a range of <u>Town and Parish Councils</u>, in particular those from across Wiltshire and residents' associations in their formal responses. - It was specifically noted that people receiving cancer treatment at the RUH have to attend very early hospital appointments at times when public transport is not an option and that anyone receiving such treatment is not well enough, in any case, to travel by alternative means. There was also concern that rat running to avoid the zone could cause congestion which could delay ambulances and that the RUH area would experience worsening air quality. - Visits to nursing homes – where in the zone, respondents feared residents would receive fewer visits. - Doctors, dentists' appointments. - Visiting friends/family. - Caring for relatives. - Car servicing, MoT and repair. - Post office. - Police station. - Train station. - Anyone making journeys from one side of Bath to the other. - People who cannot access dial a ride due to local boundaries. - Picking up/dropping off at the rail or bus station. - Participation in clubs, groups etc.

Group identified by respondents	Specific groups identified as NEGATIVELY affected/detail or reason given/concern raised
	<ul style="list-style-type: none"> - Shopping for heavy items. - Journey to childcare/nursery etc. Grandparents commented that the charges would make them less able to assist with childcare, school run etc.
<i>People attending churches/religious establishments</i>	<ul style="list-style-type: none"> - Concern about impact on the congregations of churches within the zone, including Bath Abbey. - Concern that church goes will go elsewhere. - It was noted that some churches draw in a congregation from a wide area and in some cases, there are few alternative appropriate establishments. - Street pastors, who are volunteers and may be dissuaded by additional costs. - People who support their church, e.g. by participating in the choir. - It was noted that churches also provide services to the community, including lunch clubs and parent and toddler groups and that churches rely on income from church halls (which may become less attractive to customers, due to the CAZ charges) - A range of <u>churches and religious establishments</u> commented formally via letter echoing the above concerns.
<i>Other affected people/groups</i>	<ul style="list-style-type: none"> - Anyone accessing the bus or train station - Women walking or taking public transport at night. - People who cannot cycle, walk or use the bus. - Emergency services. - Lorries who have no alternative routes. - Anyone who is at risk of isolation - People who rely on community transport, which is often older mini buses - Toads on Charlcombe Lane - Bus and taxi companies faced with the need to upgrade their fleets. - People using buses and taxis due to concerns about increasing fares. - People with specialist vehicles like campervans. - Pregnant women - People who don't use the internet (for paying the CAZ charge) - Car sharers in non-compliant vehicles (as they are already doing their bit) - Grandparents who assist with childcare commented that they would be able to do this less if faced with the CAZ charge. - People who use their non-compliant vehicle only occasionally – where changing it would not be economical, but instead they would need to pay the CAZ charges. - People who need assistance from a recovery vehicle, where the breakdown company may be charged £100 and this could be passed on to the customer. - Tourists, who would pay more to come into the city. - Charities and clubs who rely on older vehicles for essential journeys. - Second hand car dealers.

12.4 Comments relating to business in Bath

12.4.1 Quantitative feedback

There were no closed questions on this topic in the business questionnaire, therefore all feedback was qualitative.

12.4.2 Qualitative feedback

Business respondents and individuals interested in business issues suggested a wide range of specific businesses and professions that could be impacted by a charging zone, as shown in the list below. Many of these were considered to have very specific needs.

More detailed concerns are reported in Table 12-2.

The list of mentioned businesses, groups and professions included:

Agricultural

- Farmers;
- Florist;
- Gardeners; and
- Tree surgeons.

Hospitality/Events

- Bath Pavilion;
- Catering;
- Hospitality industry; and
- Event hire companies.

Teaching/Childcare

- Childminder;
- Nannies; and
- Schools.

Charitable Organisations

- Bath Samaritans;
- Charities;
- Charity workers;
- Church community;
- and
- Volunteer run organisations;

Property

- Property letting;
- Estate agents; and
- Property developers.

Trade Workers

- Architects;
- Builder/decorator;
- Cleaners;
- Construction industry;
- Electrician;
- Handymen;
- Market traders;
- Plumbers;
- Sole traders; and
- Window cleaners.

Cultural

- Artists;
- Makeup artists;
- Musicians; and
- Photographers.

Retail/Tourism

- Art gallery;
- Bath Christmas Market;
- Cafes;
- Retailers;
- Second hand furniture sellers; and
- Tour guides.

Vehicle Based Professions

- Car repair garages;
- Delivery companies/drivers;
- Driving instructors;
- Haulage companies/industry;
- Postal services;
- Private hire taxis;
- Recovery vehicles; and
- Rubbish collections.

Healthcare

- Care Home;
- Carers;
- Dentists;
- NHS staff;
- Occupational therapists; and
- Therapists.

Sport and Leisure Activities

- Bath Rugby;
- Dance teachers;
- Fitness instructors;
- Leisure centre;
- Music teachers; and
- Sports clubs and classes.

Table 12-2: Impacts on businesses

Group / impacts identified by respondents	Specific groups/individuals identified/detail given
<i>General business impacts</i>	<ul style="list-style-type: none"> - Concern that the CAZ would be another tax/burden on businesses. - Any business that involves travelling around/through the city. - Any business with non-compliant vehicles, particular those with relatively new diesels. Particular impact on smaller businesses with multiple vehicles. - Concern regarding who will buy non-compliant vehicles – i.e. businesses will be unable to sell their current vehicles. - Any business that relies on people coming into the city centre/footfall. There was concern that the CAZ would lead to decreasing footfall particularly when considered alongside the impact of recent increases in parking charges. - Businesses located within local centres such as Widcombe and Green Park. - Any business that tries to avoid the zone, in terms of increased travel time. - Concern that the CAZ will drive competition and business away and the businesses would suffer or face closure from reduced footfall. - Concern over the impact on businesses outside the zone, in areas where there is concern that parking pressure will increase, as customers will find it more difficult to park (for example in Batheaston and Bathford). - Businesses, where employees wish to pass on the CAZ charges to their employer (i.e. in requests for higher wages). - People who work at home in the zone, where clients need to visit them. - It was noted that businesses under the railway arches and on Westmoreland Road would be impacted by the CAZ. - <u>Bath Business Improvement District</u> expressed concern about the impact on businesses.
<i>Smaller businesses and traders or lower income businesses</i>	<ul style="list-style-type: none"> - Businesses or self-employed people relying on vans or delivering a trade/service in people's homes, at locations across Bath or travelling across the city and relying on clients/customers in Bath. Many cannot carry goods/tools/equipment other than by car/van and most vans are diesel and expensive. It was noted that there are limited options to swap to a petrol equivalent. It was also noted that many would be unable to afford the charges or change to a compliant vehicle(s). - Financial impacts already felt by smaller businesses due to increased parking charges. - Concerned about continuing to operate competitively when compared to larger firms with available capital. - Independent shopkeepers/small businesses in the city centre – due to less customers/footfall/loss of trade and less ability to absorb the costs (compared to large chains etc). Respondents expressed concern about potential closures and noted that many are struggling anyway, particularly in the retail sector. Generally, it was felt that the CAZ would discourage people from coming into Bath and that people would go to areas such as Cribbs Causeway instead. - There was a concern for smaller shopping areas, such as Widcombe High Street where users may not want to pay £9 and may go elsewhere instead. - Concern that the CAZ will make it difficult for tradespeople with a non-compliant vehicle to win business (as rather than paying the charge customers will find an alternative supplier with a compliant vehicle) or that they may have to look elsewhere for business. - Concern over the impact on smaller bus companies — due to the costs involved in upgrading their vehicles.

Group / impacts identified by respondents	Specific groups/individuals identified/detail given
<i>Larger businesses</i>	<ul style="list-style-type: none"> - Specific mention of the impact on larger businesses and industrial areas within the zone including Sainsburys, Homebase, Argos, Screwfix, Crown and Travis Perkins, PC World, Waitrose, petrol stations, hotels and the Pines Way and Locksbrook Industrial Estates.
<i>Employee/supplier impact</i>	<ul style="list-style-type: none"> - Particular impacts identified for companies who supply businesses in Bath, any company in the zone that relies on deliveries, any business in the zone that relies on customers coming to their premises or parking nearby. - Concern for employees on lower wages and how they will continue to travel to work, coupled with inadequate public transport from home and financial difficulty to change vehicle or pay the charge. - Concern that impact to employees will result in recruitment and retention issues. - Concern about staff commuting who work early or late shifts and how they will continue to travel without access to public transport – rural areas. - Concern that couriers will increase their prices increasing the costs of deliveries. - Concern that suppliers will increase costs/reduce frequency of deliveries/refuse to deliver/delay deliveries. - <u>Bath Chamber of Commerce</u> identified specific concerns around higher charges for deliveries to businesses within the CAZ and potential issues around recruitment.
<i>Customer and/or Client impacts</i>	<ul style="list-style-type: none"> - Concern about a reduction in spontaneous trips made by people ‘popping’ into Bath. - Elderly patients and customers of particular concern. - Concern customers will go elsewhere. - CAZ charge coupled with parking charges is likely to deter some customers and clients from visiting some businesses. - Concern that passing on costs to customers will result in becoming less competitive compared to businesses with already compliant vehicles or with the financial capacity to change or internalize the cost of the charges, and therefore could see a drop in profit.
<i>Tourism and leisure trips</i>	<ul style="list-style-type: none"> - Respondents expressed concern that the CAZ will discourage tourists from visiting Bath. This was noted by <u>Somerset Tourism</u>. - Respondents were concerned that fewer visitors to the city would have negative impacts on businesses. - Holiday/tourism businesses (i.e. self-catering accommodation, B&Bs and campsites) as guests may be put off by the additional cost - Respondents were concerned the CAZ would drive shoppers out of Bath. - Coach companies noted that they may be discouraged from entering Bath. - There was particular concern for entertainment businesses, including restaurants, cinema, theatre, particularly because the Park and Ride does not run late into the evening Taxi drivers. - There was concern for clubs and societies, or businesses running classes/groups, where the CAZ charge for non-compliant vehicles is likely to put people off/prevent people from attending. - <u>Somerset Tourism</u> noted that smaller coach operators may be particularly impacted by the CAZ and may pass these cost to customers.

12.4.3 Comments from business respondents concerning POSITIVE impacts or no impact

Some business respondents felt that there would either be no impact on them or businesses in general or that the impacts would be positive. Some business respondents felt that any Scheme that improves air quality was a benefit for businesses in Bath but also the city centre in general, making it a more attractive place to work.

Comments included:

- No forecasted negative impact on business.
- City will become a more attractive place to work and visit, and this will have a positive impact on business operations.
- Staff recruitment and retainment would be positively impacted if Bath was less polluted and supported more rigorous plans to tackle air pollution.
- The impact on their business would be positive due to the health benefit to employees, guests, customers and clients.
- There would be a positive impact on travel time payments for businesses.
- The Scheme would have a positive impact on staff productivity.

Some business respondents commented that because their team already cycle or walk, the Scheme will make this better them due to improved health and safety on roads.

12.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Continue to develop work on equalities assessments, to ensure that groups disproportionately affected are identified and targeted.
- Consider how lower income households can be supported should a Class D CAZ be taken forward, for example through concessions, discounts or exemptions.
- Consider how impacts to individual journeys can be mitigated, for example through consideration of the CAZ boundary or through specific concessions or exemptions.
- Consider how impacts on businesses can be mitigated, and how businesses can be best supported.

13. Suggestions for Alternative Ways to Tackle Air Quality

13.1 Overview

This Chapter reports:

- Comments made within Question 13 of the online individuals and groups questionnaire and Question 17 of the business questionnaire. They asked for suggestions for alternative approaches that people, groups or businesses felt could be effective in meeting the air quality targets by 2021 at the latest.
- Comments made within the responses to other Questions but that were identified as being specifically related to alternative ways of tackling the air quality problem.
- Other suggestions outlined in the letters or emails received (although fuller details of comments submitted by letter are included in Chapter 15).

Within this Section comments are summarised to give an overview of the range of feedback received. Where a comment was made multiple times, this is noted only once. It should be noted that the ordering of comments does not imply any order, priority or weighting.

Most of the comments do not identify Schemes which could replace the CAZ, but instead discuss ideas which respondents felt were important to deliver ahead of or in parallel with the CAZ. In this respect the feedback reported here overlaps with that reported in Chapter 11 on supporting measures.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath are reported in the individuals and groups section of this Chapter.

Overview of comments on alternatives

A wide range of suggestions were put forward as potential alternatives to a Class D CAZ. However, there was some overlap with the smaller scale ideas also put forward as supporting measures. Many of the ideas noted as potential alternatives were considered in previous phases of the project, are outside of the scope of this work or are issues that are otherwise being considered by the Council under its regular work on transport and planning.

13.2 Context for consideration of these comments

During the SOC stage a long list of potential measures to address the air quality issue were considered, including a range of non-charging measures and other CAZ types. These alternative approaches were examined to establish the extent to which they offered the opportunity to improve air quality by 2021 at the latest, in line with the Government directive. At this stage the assessment showed that a charging zone offered the best opportunity to tackle air quality within the required time. At OBC stage, charging options were considered further and a Class D CAZ was highlighted as the preferred option and most likely to achieve compliance with the Government directive.

Alternatives to the CAZ suggested in the consultation have been considered in the same way, and particularly in relation to the extent to which they would:

- Contribute directly to making an air quality improvement.
- Be deliverable and enable compliance with air quality standards by 2021.

Many of the comments made are outside the scope of this project for these reasons. In particular, large infrastructure schemes, such as the A36-A46 link and the east of Bath Park and Ride would not be deliverable

within the required timescale and therefore cannot be considered as appropriate alternatives to a CAZ. Similarly, other measures, such as extensive subsidies of public transport, would not be affordable with the funding available, and are therefore also not appropriate for consideration.

13.3 Comments from individuals and groups

13.3.1 Quantitative feedback

There were no closed questions on this topic, therefore all feedback was qualitative.

13.3.2 Qualitative feedback

Within Question 13 of the individuals and groups questionnaire some respondents stated that they supported the proposal for a Class D CAZ, or the general direction of the proposals and urged the Council to move plans forward to implementation. For example, many respondents:

- Typically supported the principle of taking action to address air quality.
- Supported the principle of a CAZ as an appropriate solution to air quality issues.
- Offered general support for the proposed Class D CAZ as a measure that would address air quality and traffic issues and agreed that a Class D CAZ would be the most appropriate solution.
- **South Gloucestershire Council** and a range of **residents associations** gave specific support for a Class D CAZ, albeit some suggested refinements to the published proposals.

However, many either expressed concern about the proposed Scheme; set out suggestions for other ways they felt the Council should tackle the air quality issues; or identified other Schemes that should be further considered before a final decision is made. Some reiterated that whilst they agreed with the overall principle of improving air quality, they did not support the proposed Scheme and felt it was the wrong approach, is too extreme or would have significant negative impacts.

Where respondents identified potential alternative approaches, these are summarised in Table 13-1 below. The most frequently mentioned alternatives were a link road or bypass for Bath, improved public transport and improved Park and Ride.

Table 13-1: Alternative approaches to the Scheme suggested

Type of alternative suggestion	Detail given/suggestion made
<i>Class B CAZ</i>	Some respondents felt a Class B CAZ covering a wider area would be more appropriate or that a Class B CAZ would be a better starting point.
<i>Class C CAZ</i>	<p>A range of respondents expressed a range of opinions that related to the further consideration of a Class C CAZ. These included:</p> <ul style="list-style-type: none"> - Not charging cars at all (a Class C CAZ) and focussing instead on LGVs, HGVs, buses and coaches. - Concern that a Class C CAZ had been discounted because it was deemed unaffordable. - Concern that the differences between a Class C CAZ and a Class D are very small and that a C should not be discounted. - The view that a Class C could achieve compliance. There was concern that the statement that only Class D could achieve compliance is misleading. - Implement a Class C CAZ and then also charge non-residents. - Implement a Class C but cover a wider area. - Consider a Class C with higher charges. Wiltshire Council called for this idea to be further investigated.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - A Class C CAZ with traffic management should be considered. - Address the areas where a Class C does not achieve compliance in other ways e.g. through traffic management and measures to support other modes. - Further consideration of a Class C CAZ was supported by FoBRA and Wiltshire Council, as well as by various Town and Parish Councils including Claverton Parish Council, Keynsham Town Council, Monkton Combe Parish Council and the Valley Parishes Alliance. Also supported by residents associations and local groups including Beech Avenue Residents Association, Lower Oldfield Park Residents Association and Transition Larkhall. The Motorcycle Action Group supported additional work on a Class C and Bath Chamber of Commerce was concerned about the inclusion of cars in a Class D. Other groups, including Charlcombe Parish Council, asked for cars to be excluded initially and the situation monitored.
<i>Combined approach</i>	<ul style="list-style-type: none"> - Taking a phased approach which initially would not charge cars (a Class C CAZ), introducing a charge for cars later if required. This would allow more time for car drivers to change their vehicles (although the opposite comment was also made, and people called for action to be faster). - Combine approaches for example, have an inner Class D CAZ and an outer area subject to a Class C CAZ.
<i>Alternative charging approach (see also Chapter 8)</i>	<ul style="list-style-type: none"> - Include only main roads and exclude all local roads. This would allow residents to travel within their immediate areas without incurring a charge for non-compliant vehicles. - Charge people to enter the zone via entry points located further out of the City. Initially allow trips within the zone to be undertaken without a potential charge. - Reward drivers with clean vehicles (rather than charge those with high emission vehicles). - Charge based on emissions/carbon footprint. - Mixed views on how through traffic should be considered. Some respondents felt that initially the CAZ should just charge through traffic, in particular longer distance HGV traffic that should be encouraged to use the motorway routes. Others felt that through traffic and cross city trips should not be charged as there are no alternative routes. - Charge only to use London Road. - Charge less within the central area and more in an outer zone. - Charge more for second cars. - Limit the number of trips permitted by each vehicle. - Charge based on time/mileage in the zone, recognising that a vehicle making multiple trips will pollute more than one short trip. - Include a smaller area of the city in the zone initially and only charge large vehicles. - Smaller zone with more pedestrianisation of city centre. - Work instead with vehicle fleet operators. - Include an area around every school. - Define the zone areas differently, with an inner area and an outer area. - Only grant residents permits for low emission vehicles.
<i>Other financial strategies</i>	<ul style="list-style-type: none"> - Charge everyone with a non-compliant vehicle who lives in Bath i.e. a pollution tax. - Reduce business rates.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Tax workplace parking/introduce workplace parking charges. - Increase taxes to fund improved public transport for all. - Tax tourists.
<i>Measures to target diesel vehicles</i>	<ul style="list-style-type: none"> - Some respondents called for a bolder approach to diesel vehicles. - Ban all diesel vehicles from Bath. - Encourage retrofitting/adapting of older vehicles.
<i>National strategies</i>	<ul style="list-style-type: none"> - Encourage Government to bring forward a wider ban on diesel cars by 10 years. - Adjust the emissions requirements of the MoT test to tighten up on emissions but achieve the same result nationwide. The MoT requirements should be made stricter over time. - Stop producing/discounting diesel fuel. - Car manufacturers should change. - Government should fund retrofitting of cars and HGV lorries. - Charge a higher car tax for a second vehicle. - Further increase vehicle tax for higher emission vehicles. - Lobby Government to invest more in research into electric and alternative fuels. - Charge higher fuel tax instead of road tax to discourage high mileage drivers. - Support a national clean air plan to remove the more polluting vehicles from our roads.
<i>Congestion charge</i>	<ul style="list-style-type: none"> - Some people felt that a congestion charge would be a more appropriate solution. - Some respondents felt that charging everyone an equal amount was a fairer approach/more equitable. - There were varying views on the extent of a congestion zone. Some felt everyone should be charged a smaller amount across a wider area of the city, others felt a congestion zone should focus on a smaller part of the city centre. - Charge everyone recognising that, other than electric, no vehicles are emission free. - Congestion charge should apply to all non-residents. - In addition to the CAZ have an inner congestion zone. - Congestion charge, with more exemptions. - Charge everyone based on emissions/distance travelled. - Congestion charge on the main routes into the city.
<i>Wider plan to tackle congestion</i>	<ul style="list-style-type: none"> - Develop joint congestion/air quality/transport plan. - Work with adjoining local authorities to develop a package of measure to support transition to lower emission forms of transport. - Look at examples from other countries.
<i>Restrict access</i>	<ul style="list-style-type: none"> - Allow non-compliant cars to enter the city on alternate days, depending on their registration (as per other European cities). - Various suggestions on restricting access for through traffic, coaches, single occupancy vehicles etc. - Have specific car free days/weekends. - Ban all traffic from the central area. - Make the city centre accessible only by electric or low emission vehicles. - Make the city centre local access only. Have a permit system that allows only those with valid reasons to drive in the city centre. - Allow access to the city centre based on emissions and purpose (not just on emissions). - Restrict access for higher emission vehicles at peak times. - Restrict all vehicles between certain times. - Restrict more areas to bus, taxi, emergency services and delivery access only.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Make more streets bus only for example Dorchester Street.
<i>Pedestrianisation</i>	<ul style="list-style-type: none"> - More of the city centre should be fully pedestrianised/vehicle free or pedestrian only during the day, but accessible for deliveries in early morning and evening/overnight. - Create car free areas in the city centre. This would support the World Heritage Status of the City. - Specific suggestions to pedestrianise/remove traffic from areas including Pulteney Bridge, Milsom Street (it was noted that this worked well during the Christmas markets), High Street, Queen Square, Broad Street, Green Street, Orange Grove, Saw Close, High Street, Grand Parade, Westgate, Kingsmead Square, Saw Close, Stall Street, Upper Borough Walls, Manvers Street, Pierrepont Street, Dorchester Street, Green Street, Walcot Street. - Pedestrianise areas with exclusions for residents and delivery drivers only. - Redesign city centre streets to encourage walking and cycling. - Promote Bath as a car free city.
<i>Improve buses</i>	<p>Respondents suggested that a wide range of improvements to public transport are required. Overall, respondents felt that there was a need to ensure that buses offered a more attractive alternative to the car and that buses need to be cheap, reliable, clean, quick, convenient, and go where people want to go. Chapter 11 provides further details why respondents felt public transport was not an alternative solution to cars.</p> <p>Many felt that public transport improvements could address the air quality issues or that a CAZ would not be viable/should not be implemented until public transport was overhauled. Others expressed concern that a CAZ would negatively impact the operation of public transport as it would be over capacity.</p> <p><i>Bus fares/ticketing</i></p> <ul style="list-style-type: none"> - Significantly cheaper/free bus fares, including for Park and Ride services. Buses should be cheaper than parking. - In particular cheaper bus fares for families and more subsidised services. - Improved cross company ticketing. - Giving residents a discount on or free bus passes. - Subsidised bus travel for local residents and workers. - Free travel for under 18s/school aged children. - Introduce a system like the Oyster cards in London. - Shorter journeys should be much cheaper than at present. - Simplified system for bus fares such as £1 per single journey. - Provide free bus passes from 60 and give women facing rising pension age a discounted bus pass. - Have weeks where public transport is free, to encourage people to try. - Allow residents to pay an optional extra Council Tax charge in return for free bus travel. - Negotiate reduced fuel tax for bus companies so they can afford to offer reduced fares. - Improve ticketing to speed up entry to buses, reintroduce bus conductors or promoting cashless ticketing. <p><i>Timetabling/frequency</i></p> <ul style="list-style-type: none"> - More frequent bus services, including for students and schools and in the evenings and at weekends. - Larger buses on key routes at peak times. - Improved timetabling to avoid empty buses, including tourist buses.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Ensure buses are punctual. - Buses and trains need to be better co-ordinated. - Timetabling of services needs to better meet the needs of commuters and students. - Buses should operate more as shuttle/hop on-hop off type services. <p><i>Bus infrastructure</i></p> <ul style="list-style-type: none"> - Improve bus stops and bus stop locations. - Enforce bus stops to prevent dropping off in inappropriate areas. - Provide additional bus lanes to help improve journey time reliability. Including between the Newbridge Park and Ride and the city, utilising the old railway line. - Provide more bus laybys so that buses do not hold up traffic when they stop. - Move the bus station from its current location. - Make bus lanes peak hour only. - Reinstate the bus gate at Dorchester Street. The Council's backtracking on the Southgate bus gates was not successful. - Introduce more bus gates. - Make existing bus gates 24/7. <p><i>Anti-idling</i></p> <ul style="list-style-type: none"> - Enforce anti idling for buses, with heavy fines for buses that idle. - Consideration of the extent to which existing bus lanes are causing other traffic to queue, resulting in pollution from idling engines. <p><i>Bus routes</i></p> <ul style="list-style-type: none"> - Improve bus routes to and from the rural areas. - Improve bus links between Bath and neighbouring authorities/rural outlying towns and villages, particularly at times suitable for commuters. - Overall the bus needs to be comparable to/better than a car for journeys into Bath from the surrounding areas. - Reroute buses through the city centre to reduce their impact. - Introduce a low cost/free frequent shuttle bus or circular bus service to get around the city centre. - Introduce a shuttle bus from the station to pick up points outside the town. - Improve routes to key destinations such as the hospital, University and Aztec West. - Stop cutting bus routes. - Address overcrowding and buses that run empty. - Provide shuttle buses up and down Bath's hills. - Invest in flexible/on demand bus routes. - Provide extra capacity at peak times. - Provide better bus services to the rail station, if this is going to be in the zone. <p><i>Vehicle types</i></p> <ul style="list-style-type: none"> - Ensure buses operate newer, cleaner, low emission vehicles on all routes (electric or hydrogen). Respondents saw this as capable of delivering significant improvements in air quality. - Ban high emission/diesel buses in the city centre. <p><i>Competition/operation</i></p> <ul style="list-style-type: none"> - Make the buses Council/publicly run. - Introduce a not for profit bus service. - Introduce more competition between the bus companies. <p><i>Other</i></p>

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Invest in a long-term strategy for public transport – including trams or light rail (although it was also noted that trams would affect the street scene of the WHS). - Increase promotion and publicity of bus services. - Provide more electronic real time displays. - Provide more accessible buses suitable for bikes and buggies. - Ban coaches from the city centre (see Section below). - Offer incentives for people travelling by bus, e.g. discounts in local shops. - Help to attract more bus drivers to the career.
<i>Rail</i>	<ul style="list-style-type: none"> - Trains were seen as contributing to the pollution problem and respondents called for diesel trains to be charged. - Deliver the electrification of the railway through Bath. - Encourage reopening of/new/improved rail stations and local rail services including from Saltford, Radstock/Midsomer Norton, Keynsham, Twerton, Oldfield Park, Bathampton, Hampton Row, Corsham, Box, Bradford on Avon and Westbury. - Provide additional train services/extra capacity on rail routes. - Run additional late-night services. - Encourage freight to be sent by rail. - Address overcrowding, reliability and cost. - Reopen stations and have rail and rides from these locations. - Encourage Park and Ride. - Address rail fares.
<i>Air travel</i>	<ul style="list-style-type: none"> - It was noted that aircraft contribute to the air quality issues and that this should be tackled.
<i>Improve Park and Ride</i>	<p>In addition to the general comments on public transport, respondents gave the following specific suggestions relating to Park and Ride:</p> <p>Sites</p> <ul style="list-style-type: none"> - Build the East of Bath Park and Ride. This was frequently mentioned and was seen by many as an option that may have negated the need for a CAZ. Respondents expressed strong concerns that this had not been delivered. As noted in Chapter 10 a range of organisations called for consideration of a site to the east of Bath. - Generally, create additional Park and Ride spaces/facilities. - Provide additional Park and Ride sites. Other suggestions included on the A36/Warminster Road, the A36/Lower Bristol Road and at Peasedown St John and at the M4 junction. <p>Cost</p> <ul style="list-style-type: none"> - Make Park and Ride cheaper/subsidised or free, particular need to address the cost of 2 or more people travelling together on the Park and Ride. - Instead of charging by person, charge by the car. <p>Opening hours</p> <ul style="list-style-type: none"> - Make the Park and Ride 24/7. - Ensure services run earlier in the morning and later in the evening. - Extend opening hours at the Park and Ride – the service needs to run later into the evenings. - Allow overnight parking. <p>Routes</p> <ul style="list-style-type: none"> - Improve Park and Ride routes for access to the University. - Make the Park and Ride express services.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Extend Park and Ride services at peak times, e.g. during the Christmas market. - Park and Ride routes should go right across the city, i.e. from Odd Down to the Race Course so that people do not have to get off. - Provide shuttle buses from the Park and Rides to key destinations such as the hospital. <p><i>Coaches at Park and Rides</i></p> <ul style="list-style-type: none"> - Tourist buses should drop off at the Park and Rides. - Provide Coach parking at Newbridge (like at Odd Down). <p><i>Other</i></p> <ul style="list-style-type: none"> - Better advertise/encourage use of Park and Ride using electronic roadside displays.
<i>Alternative public transport solutions</i>	<ul style="list-style-type: none"> - Invest in a long-term mass rapid transit system. - Modernise the public transport service to include trams, a metro or mono rail (although it is noted that some respondents were against a tram system). - Make use of the river.
<i>Link road/bypass</i>	<p>A wide range of comments noted the need for Bath to have a ring road, link road or bypass and expressed the view that this would better address the air quality and congestion issues, in particular the situation on London Road. Many respondents felt a solution was needed that tackled through traffic specifically. They commented that a CAZ would not be a viable solution to tackle this/should not be implemented until alternative routes for traffic are in place. As indicated in Chapter 11 a range of organisations supported this view. Without a bypass in place, respondents felt the proposed CAZ was all stick and no carrot and whilst they recognised that a bypass was a longer-term solution, they felt this was a better approach:</p> <ul style="list-style-type: none"> - Build a proper bypass or a ring road to take all the through traffic away from the town centre and make Bath a more pleasant place to live, shop and work in. - The most frequently mentioned specific route was for the A36-A46/A4 link road to take traffic, in particular HGVs, off the A4 London Road and the A36 to the Warminster Road. Respondents felt that this Scheme should have been delivered previously, and that the Batheaston bypass remained an incomplete improvement. Some felt a tunnel or underground link should be considered. - Other bypass/ring road routes were also mentioned including: <ul style="list-style-type: none"> - A northern bypass/link to the M4. - A route from Newbridge to London Road for through Bath traffic. - A western link connecting the Bristol road to the M4 avoiding Weston and Lansdown. - Better links between the A3062 and the A36. - Better links between the A363 to the A37. - Respondents commented in general terms about the need to build a tunnel or another bridge/river crossing or additional routes that would take through traffic out of the city. - Others talked in general terms about the urgent need for alternative routes, in particular north south routes, and routes from the motorway to the south of Bath. - Respondents felt that the air quality issues would only be addressed by reducing the number of vehicles (in particular HGVs) and congestion and felt that a bypass was a better option in these terms. - Respondents questioned whether a bypass would be cheaper than a CAZ and queried whether the Council had asked the Government for funding. It was felt that a bypass would be a better use of funds and a more appropriate longer-term solution.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - A bypass was seen as tackling additional issues faced by residents of east Bath, including noise, dust and vibration. A bypass would also offer relief to Bathampton village where there are currently concerns about narrow footpaths and safe access for emergency service vehicles. - A bypass was considered to impact businesses less than a CAZ. - A bypass was perceived to be a better option in terms of protecting the World Heritage status of Bath. - It was suggested that once an alternative route is in place there should be a weight restriction on Cleveland Bridge. - It was noted that Bath is one of few cities without a bypass. - It was felt that a bypass would be less disruptive and would penalise residents less. It was considered unfair that the CAZ places the emphasis on individuals to comply. - Noting that a bypass would not be delivered quickly it was suggested that as a temporary measure a one-way system should be put in place around the city centre.
<i>Improved facilities for cycling</i>	<p>A range of suggestions were made in relation to cycling. These included the following:</p> <ul style="list-style-type: none"> - Additional/improved cycle routes (particularly off-road paths and routes along safe roads) and better cycle route planning, more continuous routes and lanes that take priority over side roads. - Provide safe cycle routes into the city from each ward. - Improved maintenance of cycle paths – these should be more than a white line on the road. - Generally, invest in making Bath a safer place to travel by bike and particularly encourage the everyday cyclists. - More cycle lanes, on flat routes where possible and segregated from traffic. - More electric bikes. - Allow residents to hire bikes for free or provide interest free loans for residents to purchase electric bikes. - Provide electric bikes for hire at the Park and Ride sites. - Encourage bike riding from the Park and Rides by providing safe direct cycle routes to the city and more secure cycle parking. - Provide ways of helping cyclists get up hills (i.e. bike lifts/cable car). - Provide safe traffic free cycle routes to all schools in Bath. - Additional cycle parking. - Subsidise people to buy bikes. - Cycle training/workshops to encourage cycling, particularly for children. - Reduce levels of traffic to improve conditions for cycling. - Cycling taxis. - Better policing of traffic, to make it safer for cyclists i.e. to tackle parking in cycle lanes etc. - Reduce speeds on routes used by cyclists. - Encourage multi modal transport through bikes spaces on buses and trains.
<i>Improved facilities for walking</i>	<ul style="list-style-type: none"> - Walking should be at the centre of these proposals and should be promoted as part of a healthy lifestyle. Bath should develop a walkable city plan. - More alternative/better linked up walking routes. - Wider pavements. - Provide cable cars (as previously proposed). - More pedestrian priority/better crossings (although some respondents felt that pedestrian crossings interrupt the free flow of traffic).

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Improve pedestrian underpasses. - Generally, make the city more walkable. - Improve walking routes along the riverside. - Encourage walking by slowing traffic. - Provide street lights for those walking at night. - Also see comments on pedestrianisation.
<i>Parking</i>	<p><i>Residents parking</i></p> <ul style="list-style-type: none"> - Expand the residents parking Scheme to prevent commuter car parking, particular mention of Oldfield Park, Junction Road, Chelsea Road, Twerton, Lansdown, Moorland Road, Larkhall, Wellsway, Rosemont Lane, Greenway Lane, Lyncombe Vale and Perrymead area and London Road. It was suggested that all areas within 30 minutes' walk of the city centre should be covered, or that all areas should be covered to the Park and Ride sites. - If the CAZ goes ahead, consider the impact of parking on areas at the boundary of the zone. - Offer free parking permits to residents. - Make the central zone residents only (rather than shared with pay and display). - Stop giving residents permits to hotels. - Employ more parking enforcement staff. - Restrict parking in residential areas to one hour per day to prevent commuter parking. - Allow residents to park in the city centre for free for one hour. - There was some concern about residents parking areas being split, part in, part out of the CAZ. <p><i>Other parking</i></p> <ul style="list-style-type: none"> - Provide more/cheaper parking on the edge of the city centre to encourage park and walk. - Various comments were made on the quantity of city centre parking with some suggesting the volume of city centre parking should be reduced (or some car parks closed) to encourage use of Park and Ride and to discourage people from driving into the centre. However, some suggested there should be more parking to help reduce the need for looping around/extra miles looking for a space. - Various comments on parking charges with some suggesting parking charges should be lower to offset the CAZ charges and others feeling parking charges should be higher to discourage traffic. - Make parking more expensive for higher emission vehicles and free for electric vehicles. - Give parking priority to the least polluting vehicles. - Harsher penalties for people who block main roads with inappropriate parking. - Limit number of cars for houses in multiple occupation. - More motorcycle parking. - Remove/reduce the amount of on street parking. It was suggested that this would aid the free flow of traffic. Parking outside Westgate Buildings highlighted as a particular problem. - Include a tourist tax on parking/make it harder for day visitors to park. Continue to charge residents less/don't disadvantage residents. - Withdraw Councillors parking permits. - Charge for parking on Sundays. - Tax workplace parking.

Type of alternative suggestion	Detail given/suggestion made
<i>Bus lanes/gates</i>	<ul style="list-style-type: none"> - Remove bus lanes, for example on London Road and bus gates as these slows down vehicles/reallocate this space to cars. - Turn bus lanes into lanes for low emission vehicles. - Restrict buses and coaches in the centre/on through routes at certain times. - Allow buses only on an increased number of streets using bus gates. - On key routes have 3 lanes, with bus lane working with flow of majority of traffic (e.g. into Bath in the morning and out in the evening). - Review hours of operation of existing bus gate.
<i>Traffic signals and traffic flow</i>	<ul style="list-style-type: none"> - Remove unnecessary sequences and better sequence traffic lights to avoid stop/start traffic. Synchronise traffic lights with pedestrian crossings and generally improve the flow of traffic. Particular mention of London Road and the area around the bus station/Southgate car park. Make London Road an urban freeway. - Rearrange London Road/Cleveland Place junction to create a shared space. - Use more intelligent traffic light systems. - Replace traffic lights with roundabouts to keep traffic moving. - Ensure traffic lights respond to peaks e.g. to allow everyone to get out of the city at the end of the day. - Space out pedestrian crossings, too many close together hold up the traffic. Reduce pedestrian crossings on main roads. <p><i>Traffic flow</i></p> <ul style="list-style-type: none"> - General comments about upgrading/re-planning roads and keeping traffic moving/ensuring a smoother flow of traffic, particularly on the A4 and the A36. - Suggestions to remove bus gates and bus lanes and bus stops to improve traffic flow. - Suggestions to change the entrance/exit to the bus station or bus the location of the bus station. - Address narrow points/pinch points, for example on Junction Road. - Improve London Road/Cleveland Place junction to improve flow. - Make London Road a dual carriageway. - Reroute all traffic around the city centre/create a ring road. Some suggested this should be a large one-way system. - Improve the roads that take traffic around and away from the city. - Open the road from the Upper to Lower Bristol roads (by the Western Riverside development).
<i>One way</i>	<ul style="list-style-type: none"> - Introduce a one-way system in parts of the City. For example, through Queen Square and around Widcombe. - Change the one-way system at the bus station (swap it around). - A one-way system was seen as a potential alternative to a bypass or ring road – taking traffic around the city centre.
<i>Traffic calming</i>	<ul style="list-style-type: none"> - Mixed views on traffic calming. Some felt it should be removed to aid traffic flow, particularly where this requires sharp braking and acceleration, others thought more areas of the city should be traffic calmed. - Mixed views on 20 mph areas, some felt these should be removed/should only be in the highest risk areas and saw 20 mph areas as inefficient for fuel. Others thought they should be expanded to cover additional areas of the city and be better enforced. - Reduce traffic speeds. - Support for 20 mph around schools etc. - Make specific roads access only. Specific mention of Dorchester Street.

Type of alternative suggestion	Detail given/suggestion made
<i>Other traffic management measures</i>	<p><i>Anti-idling</i></p> <ul style="list-style-type: none"> - Enforce a ban on idling engines/anti-idling zones, especially buses and coaches. <p><i>HGV routeing</i></p> <ul style="list-style-type: none"> - Take HGVs out of the city centre. - Add weight limits to key routes including London Road and Camden. - Restrict HGVs at certain times/encourage off peak deliveries. - Consider lanes just for HGVs. <p><i>Roadworks</i></p> <ul style="list-style-type: none"> - Better plan/co-ordinate roadworks. - Do roadworks at night. - Fines when roadworks over run/carefully monitor contractors. <p><i>Alternative routes</i></p> <ul style="list-style-type: none"> - Generally, respondents commented that Bath needs another bridge. - Various views on the toll bridge. Some suggested removing the toll, whereas others suggested increasing the toll to prevent it being used as an alternative route. - Provide additional east/west and north/south links. <p><i>Other</i></p> <ul style="list-style-type: none"> - Introduce 2+ lanes. - Develop a comprehensive Bath transport plan. - Improve the roads/road maintenance. - Improved signage and road markings. - Better signposting of diversion routes. - Improve infrastructure on other roads – e.g. the toll bridge and the B3110. - Reclassify the A roads to discourage traffic from passing through Bath/to encourage traffic to keep to the motorway. - Reclassify the B3111 to an unclassified road. - Better planning and coordination of roadworks to prevent congestion and of occasional events that impact traffic flow, including University change over weekends and the Christmas Markets. - Ban through traffic. - Reconsider the location of the bus station.
<i>Tourism/tour buses</i>	<p>Respondents acknowledged that Bath's success as a tourist destination brings with it a number of challenges and suggested that the following should be considered to manage the impact of tourism on air quality and traffic:</p> <ul style="list-style-type: none"> - Reduce/restrict number of tour buses and coaches. - Restrict unofficial tour buses. - Prohibit tour buses from the city centre. Particular concern about tourist buses on Terrace Walk. - Limit number of tourist buses (as many run empty). - Provide more coach parking/allow coach parking at other Park and Ride sites. Coaches should drop off at the Park and Ride and transfer passengers to smaller electric buses. Or drop tourists at railway stations outside of Bath so that they come in by train. - Charge coaches more. - Introduce a tourist tax (although also concerns that a tourist tax and CAZ charge would impact the tourist trade). - Enforce coach parking to ensure they are parked only at designated sites (not on the side of the road).

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Ban high emission/non-compliant coaches. - Do more to advise tourists to travel by rail or Park and Ride. - Ban coaches from idling in the centre.
<i>Taxis</i>	<ul style="list-style-type: none"> - Make all taxis zero emission/electric. - Ban non-compliant taxis.
<i>Schools and student travel</i>	<p>School traffic was identified as a particular issue and the following were suggested to help manage the impact of the school run:</p> <p><i>Schools</i></p> <ul style="list-style-type: none"> - Introduce more school buses, particularly for primary school children. - Provide free travel for students on buses and trains. - Discourage/limit parents driving children to school. Encourage them to drop at school bus pick up points. - Run campaigns/work with schools and PTAs to encourage walking and cycling to school. - Provide free buses at school pick up/drop off times. - Reward pupils who walk/cycle to school. - Improve walking and cycling routes to schools. - Particular note of school traffic related problems in Larkhall. - Create drop off points for private schools, and bus students in from these. - Set up walking buses with staff to supervise children. - Stagger school start times. - Encourage car share on the school run. - Use school mini buses for the school run. - Change admissions system to encourage choice of schools within walking distance and encourage parents to choose their local school. - All school children to use Park and Ride buses free of charge. - Charge large (new) cars that do the school run. - Create zones around schools where no parking/drop off is allowed. - Invest in cycle training for school children. - Charge school run traffic. - Ban all school traffic. <p><i>University</i></p> <ul style="list-style-type: none"> - Cut down on the amount of student accommodation in the city centre/grant less permissions or multi occupancy developments. - Cut down on the number of University buses. - Restrict/prevent students from having cars in the city and move student housing closer to the University. Incentivise students not to bring cars. - Manage traffic better on University accommodation change over weekends. - Student buses were perceived as adding to the air quality problem. - Encourage more students to live on campus/provide more accommodation on campus so that they do not need a car.
<i>Low emission and electric vehicles</i>	<p>Encouraging electric vehicles was seen as an important aspect of Scheme proposals:</p> <p><i>Charging infrastructure</i></p> <ul style="list-style-type: none"> - Expand infrastructure, charging points etc for electric vehicles. - Install public charging points on every road and in all Council car parks. - Encourage hydrogen as an alternative fuel. Provide infrastructure to support change of fuel – i.e. hydrogen fuelling stations. - Consider LPG and SCR technology to treat exhausts.

Type of alternative suggestion	Detail given/suggestion made
	<p><i>Access and parking</i></p> <ul style="list-style-type: none"> - Make one city centre car park for electric vehicles only. - Make the central zone/certain streets accessible to low emission/electric vehicles only. - Give priority to electric vehicles for example in car parks and through use of priority lanes. - Reduce parking charges for electric vehicles. <p><i>Public vehicles</i></p> <ul style="list-style-type: none"> - Ensure all commercial vehicles, buses etc are electric. - Make all buses and taxis electric. - Ensure all Council vehicles are emission free. - All recycling lorries should have start/stop engines. - Use electric vehicles to run a shuttle service from Park and Rides and also to do deliveries. <p><i>Support and advice</i></p> <ul style="list-style-type: none"> - Regardless of whether a CAZ goes ahead, respondents felt that there should be financial support, advice and encouragement to people to switch to lower emission vehicles. - Introduce incentives and financial support for people to buy new cleaner cars and electric bikes.
<i>Anti-idling</i>	<ul style="list-style-type: none"> - Encourage anti idling (switch of engines when stationary) but also some concern that switching on/off whilst moving in a slow a queue of traffic is counterproductive. - In particular ensure buses, coaches and taxis do not idle. - Make sure the system is enforced (use parking enforcement staff/pass a by-law). - Increase the fine for anti-idling. - There was some concern over the benefits of idling for different engine types.
<i>Motorcycles</i>	<ul style="list-style-type: none"> - Encourage motorcycling with safe routes and more parking. - It is noted that other respondents would like motorbikes to be included within the charge or to ban motorbikes.
<i>HGVs/deliveries</i>	<p>Respondents identified HGVs as contributing to the air quality issues. Many commented that HGV volumes should be reduced by any means possible. The following specific suggestions were noted:</p> <p><i>Charging strategies</i></p> <ul style="list-style-type: none"> - Charge HGVs first before charging cars or charge only HGVs. - Charge HGVs at specific points. - Increase the proposed CAZ charge for HGVs to discourage them more. - Charge HGV through traffic more. <p><i>Restricted access/routeing</i></p> <ul style="list-style-type: none"> - Ban all/reduce volume of HGVs in the city centre and on the A4/A36 as the priority first step. Respondents saw heavy vehicles as the biggest problem. - Ban higher emission/diesel lorries/refuse collection vehicles. - Add weight restrictions to some roads for example Cleveland Bridge, Lansdown Road, Bathwick Hill, Pennyquick, Whiteway Road, Rush Hill, Monkton Combe viaduct, London Road or parts of the A4/A36. - Ban all HGVs that are not delivering to the central area/check that all have a legitimate destination in the city (ban HGVs from using Bath as a through route). - Encourage HGVs to use alternative routes, such as the A350 and M4. - Encourage supermarkets to manage timing of deliveries.

Type of alternative suggestion	Detail given/suggestion made
	<p><i>Access control</i></p> <ul style="list-style-type: none"> - Encourage deliveries outside working hours/overnight. - Limit times of access for HGVs/ban HGVs from the city during specific times, such as during rush hours. <p><i>Freight transfer</i></p> <ul style="list-style-type: none"> - Set up a depot/transfer station on the edge of the city centre allowing HGVs to consolidate their loads and have these taken into the city centre by a short haul electric fleet. - Encourage local delivery vehicles to be electric i.e. electric vans. - Better/clearer routes are needed for HGVs - Work with Wiltshire to develop HGV routes. - Encourage HGVs to use the motorway. - Retrofit/clean up HGVs as the priority. - Provide a route to allow HGVs to avoid Bath. - Encourage use of rail freight. - Allow only small delivery vans in the city centre. - Various other delivery strategies were suggested by individual respondents.
<i>Car sharing</i>	<ul style="list-style-type: none"> - Tackle single occupancy car use. - Expand car clubs. - Provide more support for car sharing, for example by providing support similar to that given for school travel plans. Specific mention of the RUH. - Have specific car sharing car parks, where profit is reinvested in sustainable transport.
<i>Car free days</i>	<ul style="list-style-type: none"> - Create car free zones at key times – e.g. during the Christmas markets. - Have occasional car free days/weekends.
<i>Incentives to buy new cars</i>	<ul style="list-style-type: none"> - Provide financial support and incentives to encourage people to change their car. It was suggested that this should be offered instead of a CAZ, to actively encourage positive change. - Support people rather than charge them. - The funds that would otherwise pay for the CAZ should fund grants.
<i>Publicity/incentives</i>	<ul style="list-style-type: none"> - Increased efforts to encourage people who work in the city centre to use public transport and walk/cycle options. - Work with employers to encourage cycling/walking to work. - Encourage employers to do more to encourage alternative modes etc. - Given incentives/discounts to people travelling by bus etc. - Publish emissions levels daily. - Encourage people to monitor air quality in their own areas. - Encourage people to buy locally produced goods to cut down road miles. - Promote/encourage home working. - More education on air quality and publicity of health benefits of alternative modes. - Raise awareness of issues caused by short trips/single occupancy trips. - Provide facilities for luggage in town i.e. lockers. - Car scrappage schemes.
<i>Planning</i>	<p>More joined up transport and land use planning, and more cross boundary planning. Stop developments in the city until infrastructure is in place.</p> <ul style="list-style-type: none"> - Do not allow proposed parking at Rugby ground. - Relocate the Rugby ground. - Prevent new housing development along major routes.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Develop a combined air quality/congestion plan. - Encourage businesses to locate outside of Bath to reduce traffic in the city centre. - Overall strategy to reduce amount of goods transported by road. - Provide more central housing so people can live close to their place of work, particularly for key workers. - Move car showrooms out of the city centre. - Provide better facilities in rural areas, to reduce the need to use the city centre. - Reduce the number of students and tourists in the city. - Ensure new developments have their own shops and facilities so that people do not need to travel. - Provide petrol stations outside of the city centre. - Provide more housing and jobs in the city centre to prevent the need to travel.
<i>Householder level suggestions</i>	<ul style="list-style-type: none"> - Ban bonfires. - Monitor household chimney emissions/ban solid fuel fires.
<i>Other suggestions</i>	<p>A range of other suggestions were put forward:</p> <ul style="list-style-type: none"> - Plant more trees along roads. - Encourage working from home/flexible working. - Prevent smoking in all public places. - Wider Scheme needed to retrofit all older vehicles. - Consider traffic management via Artificial Intelligence based solutions. - Consider other sources of emissions e.g. agriculture and fireworks. - Have roadside checks to stop vehicles emitting exhaust fumes in areas with poor air quality. - Make Councillors use public transport. - Support better community transport. - Look at methods used in other countries for example large fans to blow pollution away from houses or large pumps/filters. - Tackle pollution from aircraft and large ships. - Target polluting boats. - Supplement the CAZ with other zones elsewhere across B&NES.

13.4 Comments relating to business in Bath

13.4.1 Quantitative feedback

There were no closed questions on this topic, therefore all feedback was qualitative.

13.4.2 Qualitative feedback

A range of business respondents commented on alternative approaches that could be taken, these are shown in Table 13-2 below. Many of these comments overlap with suggested supporting measures, reported in Chapter 11.

Table 13-2: Alternative approaches to the Scheme suggested by businesses

Alternatives	Comments/details given
<i>Buses and wider public transport</i>	<p>A wide range of improvements to public transport are required either instead of or in addition to the CAZ, as part of a broader plan. It was felt that these improvements would help to support their business operations by improving the quality of life for staff and visitors to the city, in relation to the health benefits and cost savings as a result of cheaper fares. Comments included:</p> <ul style="list-style-type: none"> - Make better use of the river and introduce a water taxi service. - Lower price or free bus services. - More rural bus services. - Upgrade to cleaner buses/electric buses or retrofit buses to decrease emissions. - Remove buses from the city. - Move bus station out of the city. - Limit number of coaches in city. - Reduce bus lanes. - Put benches in the bus station. - Tram system. - Horse and carts.
<i>Taxis</i>	<p>Suggestions to help business in Bath included:</p> <ul style="list-style-type: none"> - Free taxis. - Move the taxi rank for the rail station to Widcombe.
<i>Park and ride</i>	<p>Respondents felt that improved Park and Ride services would make it easier for customers to access their services and for staff to travel to work without relying on car usage. Comments and suggestions for improvements included:</p> <ul style="list-style-type: none"> - Increase the number of Park and Ride sites and capacity at existing sites. - Suggestions for additional Park and Ride sites: Eastern Park and Ride; on Bradford on Avon side of Bath; on London road; along the original Bristol to Bath Cycle route - Improved Park and Ride on all entry points to the city. - Free Park and Ride. - Better promotion of Park and Ride to visitors and local residents. - Introduction of a river Park and Ride.
<i>Rail</i>	<p>Suggestions to help businesses included:</p> <ul style="list-style-type: none"> - More train services to Oldfield Park. - Provide an effective drop off point for Bath Spa Train Station south of the river.

Alternatives	Comments/details given
<i>Cycling and walking</i>	<p>Many business respondents felt that improved walking and cycling facilities in Bath would help staff to travel to work sustainably. This would also enable visitors and customers to access their services using sustainable transport modes and help to reduce car usage across the city. Comments and suggestions included:</p> <p><i>Walking</i></p> <ul style="list-style-type: none"> - Pedestrian only areas. - Improve walking environment for pedestrians. <p><i>Cycling</i></p> <ul style="list-style-type: none"> - Increased provision for cycle ways. - Improve safety for cyclists by providing safe and separate cycle routes across the city. - Prevent cycling up hill on Lansdown Road, Bathwick Hill and Wellsway from 8am to 7pm because it holds up traffic and increases pollution.
<i>Parking</i>	<p>Some business respondents mentioned parking as a way to improve air quality in Bath. Suggestions included:</p> <ul style="list-style-type: none"> - More out of town car parks (potentially also closing those in the city centre). - Stop B&NES vehicles parking in city centre. - Remove all on street parking from main routes like A367.
<i>Bypass around Bath, A46/36 link</i>	<ul style="list-style-type: none"> - The need for a bypass either alongside a CAZ or as an alternative would help those needing to travel through the city. Most common suggestion was for A46-A36 link road.
<i>Traffic flow/infrastructure</i>	<p>It was felt that current traffic management in Bath was a driving factor behind poor air quality. There were suggestions relating to improved traffic management as a way to reduce pollution in Bath. Suggestions and comments included:</p> <ul style="list-style-type: none"> - Improve traffic flow – remove 20 mph speed limits. - Traffic management aimed at reducing rat runs will have a negative impact on those living in or near the city centre. - Reduce congestion. - Open bus lanes. - Bus stop placement causes traffic build up. - Small flyover at Red Lion and Globe roundabouts. - Change one-way system around forum/bus station/Avon Street. - Anti-idling enforcement. - Out of town parcel depot for courier firms to prevent vans in the city with a switch to electric vans when needed. - Provide a route around the city charge free. - Reroute HGVs transiting the city. - Build a tunnel/bridge.
<i>Cleaner vehicles</i>	<p>There were suggestions to encourage the use of cleaner vehicles by businesses and the general public in Bath. Comments and suggestions included:</p> <ul style="list-style-type: none"> - Offer incentives to change to cleaner vehicles. - Provide more electric charging points in Bath. - Hydrogen fuel should be more widely advertised and available. - Make buses, delivery vans and taxis electric. - Encourage uptake of non-diesel HGVs e.g. Biomethane or electric. - Subsidise the fitting of filters for older diesel vehicles.

Alternatives	Comments/details given
<i>Restricting Traffic</i>	<p>Some businesses suggested restricting traffic as an alternative to charging vehicles. Suggestions included</p> <ul style="list-style-type: none"> - Pedestrianise Bath. - Pedestrianise Milsom Street. - Limit trade deliveries between 7 and 10 am. - Ban HGVs in city centre. - Have a vehicle free day. - Ban all vehicles, use horses instead. - Alternate days for vehicle access. - Vehicle free Sundays. - Gradually phase out all vehicles from the city centre except commercial traffic. - Ban tourist buses. - Replace tourist buses with tuk tuks.
<i>Other</i>	<p>There were a range of other suggestions by business respondents as alternatives to the proposed Scheme. These included:</p> <ul style="list-style-type: none"> - Should consider a congestion charge. - Promote car share Schemes. - Cancel the Christmas market. - All retro-fitted vehicles should be allowed in the zone. - Open fires should be banned. - Large scale tree planting programme. - Ban BBQs and burning of garden waste.

13.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Review previous statements on, and further examine as appropriate, the feasibility of a Class C CAZ; for example, if combined with other measures or with traffic management.
- Restate the reasons why a wider congestion charge is not currently being pursued.
- Restate the reasons why the required air quality improvements cannot be met through focus on improvements to buses, coaches, school travel, Park and Ride, traffic management, walking and cycling (i.e. non charging measures only).
- Explain why wider infrastructure improvements, including A36-A36 link road and the east of Bath Park and Ride are outside the scope of this project, and confirm the Council's overall position on these issues.

14. Suggestions for Alternative Ways to Tackle Air Quality

14.1 Overview

This Chapter reports:

- Comments made within Question 13 of the online individuals and groups questionnaire and Question 17 of the business questionnaire. They asked for suggestions for alternative approaches that people, groups or businesses felt could be effective in meeting the air quality targets by 2021 at the latest.
- Comments made within the responses to other Questions but that were identified as being specifically related to alternative ways of tackling the air quality problem.
- Other suggestions outlined in the letters or emails received (although fuller details of comments submitted by letter are included in Chapter 15).

Within this Section comments are summarised to give an overview of the range of feedback received. Where a comment was made multiple times, this is noted only once. It should be noted that the ordering of comments does not imply any order, priority or weighting.

Most of the comments do not identify Schemes which could replace the CAZ, but instead discuss ideas which respondents felt were important to deliver ahead of or in parallel with the CAZ. In this respect the feedback reported here overlaps with that reported in Chapter 11 on supporting measures.

It should be noted that comments made by individuals and groups that were identified as relevant to business in Bath have been reported in the business section of this Chapter. Comments made by business respondents that were not directly relevant to business operations, but instead reflected the views of business respondents on how the CAZ would impact their personal and day to day activities in and around Bath are reported in the individuals and groups section of this Chapter.

Overview of comments on alternatives

A wide range of suggestions were put forward as potential alternatives to a Class D CAZ. However, there was some overlap with the smaller scale ideas also put forward as supporting measures. Many of the ideas noted as potential alternatives were considered in previous phases of the project, are outside of the scope of this work or are issues that are otherwise being considered by the Council under its regular work on transport and planning.

14.2 Context for consideration of these comments

During the SOC stage a long list of potential measures to address the air quality issue were considered, including a range of non-charging measures and other CAZ types. These alternative approaches were examined to establish the extent to which they offered the opportunity to improve air quality by 2021 at the latest, in line with the Government directive. At this stage the assessment showed that a charging zone offered the best opportunity to tackle air quality within the required time. At OBC stage, charging options were considered further and a Class D CAZ was highlighted as the preferred option and most likely to achieve compliance with the Government directive.

Alternatives to the CAZ suggested in the consultation have been considered in the same way, and particularly in relation to the extent to which they would:

- Contribute directly to making an air quality improvement.
- Be deliverable and enable compliance with air quality standards by 2021.

Many of the comments made are outside the scope of this project for these reasons. In particular, large infrastructure schemes, such as the A36-A46 link and the east of Bath Park and Ride would not be deliverable

within the required timescale and therefore cannot be considered as appropriate alternatives to a CAZ. Similarly, other measures, such as extensive subsidies of public transport, would not be affordable with the funding available, and are therefore also not appropriate for consideration.

14.3 Comments from individuals and groups

14.3.1 Quantitative feedback

There were no closed questions on this topic, therefore all feedback was qualitative.

14.3.2 Qualitative feedback

Within Question 13 of the individuals and groups questionnaire some respondents stated that they supported the proposal for a Class D CAZ, or the general direction of the proposals and urged the Council to move plans forward to implementation. For example, many respondents:

- Typically supported the principle of taking action to address air quality.
- Supported the principle of a CAZ as an appropriate solution to air quality issues.
- Offered general support for the proposed Class D CAZ as a measure that would address air quality and traffic issues and agreed that a Class D CAZ would be the most appropriate solution.
- **South Gloucestershire Council** and a range of **residents associations** gave specific support for a Class D CAZ, albeit some suggested refinements to the published proposals.

However, many either expressed concern about the proposed Scheme; set out suggestions for other ways they felt the Council should tackle the air quality issues; or identified other Schemes that should be further considered before a final decision is made. Some reiterated that whilst they agreed with the overall principle of improving air quality, they did not support the proposed Scheme and felt it was the wrong approach, is too extreme or would have significant negative impacts.

Where respondents identified potential alternative approaches, these are summarised in Table 13-1 below. The most frequently mentioned alternatives were a link road or bypass for Bath, improved public transport and improved Park and Ride.

Table 14-1: Alternative approaches to the Scheme suggested

Type of alternative suggestion	Detail given/suggestion made
<i>Class B CAZ</i>	Some respondents felt a Class B CAZ covering a wider area would be more appropriate or that a Class B CAZ would be a better starting point.
<i>Class C CAZ</i>	<p>A range of respondents expressed a range of opinions that related to the further consideration of a Class C CAZ. These included:</p> <ul style="list-style-type: none"> - Not charging cars at all (a Class C CAZ) and focussing instead on LGVs, HGVs, buses and coaches. - Concern that a Class C CAZ had been discounted because it was deemed unaffordable. - Concern that the differences between a Class C CAZ and a Class D are very small and that a C should not be discounted. - The view that a Class C could achieve compliance. There was concern that the statement that only Class D could achieve compliance is misleading. - Implement a Class C CAZ and then also charge non-residents. - Implement a Class C but cover a wider area. - Consider a Class C with higher charges. Wiltshire Council called for this idea to be further investigated.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - A Class C CAZ with traffic management should be considered. - Address the areas where a Class C does not achieve compliance in other ways e.g. through traffic management and measures to support other modes. - Further consideration of a Class C CAZ was supported by FoBRA and Wiltshire Council, as well as by various Town and Parish Councils including Claverton Parish Council, Keynsham Town Council, Monkton Combe Parish Council and the Valley Parishes Alliance. Also supported by residents associations and local groups including Beech Avenue Residents Association, Lower Oldfield Park Residents Association and Transition Larkhall. The Motorcycle Action Group supported additional work on a Class C and Bath Chamber of Commerce was concerned about the inclusion of cars in a Class D. Other groups, including Charlcombe Parish Council, asked for cars to be excluded initially and the situation monitored.
<i>Combined approach</i>	<ul style="list-style-type: none"> - Taking a phased approach which initially would not charge cars (a Class C CAZ), introducing a charge for cars later if required. This would allow more time for car drivers to change their vehicles (although the opposite comment was also made, and people called for action to be faster). - Combine approaches for example, have an inner Class D CAZ and an outer area subject to a Class C CAZ.
<i>Alternative charging approach (see also Chapter 8)</i>	<ul style="list-style-type: none"> - Include only main roads and exclude all local roads. This would allow residents to travel within their immediate areas without incurring a charge for non-compliant vehicles. - Charge people to enter the zone via entry points located further out of the City. Initially allow trips within the zone to be undertaken without a potential charge. - Reward drivers with clean vehicles (rather than charge those with high emission vehicles). - Charge based on emissions/carbon footprint. - Mixed views on how through traffic should be considered. Some respondents felt that initially the CAZ should just charge through traffic, in particular longer distance HGV traffic that should be encouraged to use the motorway routes. Others felt that through traffic and cross city trips should not be charged as there are no alternative routes. - Charge only to use London Road. - Charge less within the central area and more in an outer zone. - Charge more for second cars. - Limit the number of trips permitted by each vehicle. - Charge based on time/mileage in the zone, recognising that a vehicle making multiple trips will pollute more than one short trip. - Include a smaller area of the city in the zone initially and only charge large vehicles. - Smaller zone with more pedestrianisation of city centre. - Work instead with vehicle fleet operators. - Include an area around every school. - Define the zone areas differently, with an inner area and an outer area. - Only grant residents permits for low emission vehicles.
<i>Other financial strategies</i>	<ul style="list-style-type: none"> - Charge everyone with a non-compliant vehicle who lives in Bath i.e. a pollution tax. - Reduce business rates. - Tax workplace parking/introduce workplace parking charges. - Increase taxes to fund improved public transport for all. - Tax tourists.

Type of alternative suggestion	Detail given/suggestion made
<i>Measures to target diesel vehicles</i>	<ul style="list-style-type: none"> - Some respondents called for a bolder approach to diesel vehicles. - Ban all diesel vehicles from Bath. - Encourage retrofitting/adapting of older vehicles.
<i>National strategies</i>	<ul style="list-style-type: none"> - Encourage Government to bring forward a wider ban on diesel cars by 10 years. - Adjust the emissions requirements of the MoT test to tighten up on emissions but achieve the same result nationwide. The MoT requirements should be made stricter over time. - Stop producing/discounting diesel fuel. - Car manufacturers should change. - Government should fund retrofitting of cars and HGV lorries. - Charge a higher car tax for a second vehicle. - Further increase vehicle tax for higher emission vehicles. - Lobby Government to invest more in research into electric and alternative fuels. - Charge higher fuel tax instead of road tax to discourage high mileage drivers. - Support a national clean air plan to remove the more polluting vehicles from our roads.
<i>Congestion charge</i>	<ul style="list-style-type: none"> - Some people felt that a congestion charge would be a more appropriate solution. - Some respondents felt that charging everyone an equal amount was a fairer approach/more equitable. - There were varying views on the extent of a congestion zone. Some felt everyone should be charged a smaller amount across a wider area of the city, others felt a congestion zone should focus on a smaller part of the city centre. - Charge everyone recognising that, other than electric, no vehicles are emission free. - Congestion charge should apply to all non-residents. - In addition to the CAZ have an inner congestion zone. - Congestion charge, with more exemptions. - Charge everyone based on emissions/distance travelled. - Congestion charge on the main routes into the city.
<i>Wider plan to tackle congestion</i>	<ul style="list-style-type: none"> - Develop joint congestion/air quality/transport plan. - Work with adjoining local authorities to develop a package of measure to support transition to lower emission forms of transport. - Look at examples from other countries.
<i>Restrict access</i>	<ul style="list-style-type: none"> - Allow non-compliant cars to enter the city on alternate days, depending on their registration (as per other European cities). - Various suggestions on restricting access for through traffic, coaches, single occupancy vehicles etc. - Have specific car free days/weekends. - Ban all traffic from the central area. - Make the city centre accessible only by electric or low emission vehicles. - Make the city centre local access only. Have a permit system that allows only those with valid reasons to drive in the city centre. - Allow access to the city centre based on emissions and purpose (not just on emissions). - Restrict access for higher emission vehicles at peak times. - Restrict all vehicles between certain times. - Restrict more areas to bus, taxi, emergency services and delivery access only. - Make more streets bus only for example Dorchester Street.

Type of alternative suggestion	Detail given/suggestion made
<i>Pedestrianisation</i>	<ul style="list-style-type: none"> - More of the city centre should be fully pedestrianised/vehicle free or pedestrian only during the day, but accessible for deliveries in early morning and evening/overnight. - Create car free areas in the city centre. This would support the World Heritage Status of the City. - Specific suggestions to pedestrianise/remove traffic from areas including Pulteney Bridge, Milsom Street (it was noted that this worked well during the Christmas markets), High Street, Queen Square, Broad Street, Green Street, Orange Grove, Saw Close, High Street, Grand Parade, Westgate, Kingsmead Square, Saw Close, Stall Street, Upper Borough Walls, Manvers Street, Pierrepont Street, Dorchester Street, Green Street, Walcot Street. - Pedestrianise areas with exclusions for residents and delivery drivers only. - Redesign city centre streets to encourage walking and cycling. - Promote Bath as a car free city.
<i>Improve buses</i>	<p>Respondents suggested that a wide range of improvements to public transport are required. Overall, respondents felt that there was a need to ensure that buses offered a more attractive alternative to the car and that buses need to be cheap, reliable, clean, quick, convenient, and go where people want to go. Chapter 11 provides further details why respondents felt public transport was not an alternative solution to cars.</p> <p>Many felt that public transport improvements could address the air quality issues or that a CAZ would not be viable/should not be implemented until public transport was overhauled. Others expressed concern that a CAZ would negatively impact the operation of public transport as it would be over capacity.</p> <p><i>Bus fares/ticketing</i></p> <ul style="list-style-type: none"> - Significantly cheaper/free bus fares, including for Park and Ride services. Buses should be cheaper than parking. - In particular cheaper bus fares for families and more subsidised services. - Improved cross company ticketing. - Giving residents a discount on or free bus passes. - Subsidised bus travel for local residents and workers. - Free travel for under 18s/school aged children. - Introduce a system like the Oyster cards in London. - Shorter journeys should be much cheaper than at present. - Simplified system for bus fares such as £1 per single journey. - Provide free bus passes from 60 and give women facing rising pension age a discounted bus pass. - Have weeks where public transport is free, to encourage people to try. - Allow residents to pay an optional extra Council Tax charge in return for free bus travel. - Negotiate reduced fuel tax for bus companies so they can afford to offer reduced fares. - Improve ticketing to speed up entry to buses, reintroduce bus conductors or promoting cashless ticketing. <p><i>Timetabling/frequency</i></p> <ul style="list-style-type: none"> - More frequent bus services, including for students and schools and in the evenings and at weekends. - Larger buses on key routes at peak times. - Improved timetabling to avoid empty buses, including tourist buses. - Ensure buses are punctual.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Buses and trains need to be better co-ordinated. - Timetabling of services needs to better meet the needs of commuters and students. - Buses should operate more as shuttle/hop on-hop off type services. <p><i>Bus infrastructure</i></p> <ul style="list-style-type: none"> - Improve bus stops and bus stop locations. - Enforce bus stops to prevent dropping off in inappropriate areas. - Provide additional bus lanes to help improve journey time reliability. Including between the Newbridge Park and Ride and the city, utilising the old railway line. - Provide more bus laybys so that buses do not hold up traffic when they stop. - Move the bus station from its current location. - Make bus lanes peak hour only. - Reinstate the bus gate at Dorchester Street. The Council's backtracking on the Southgate bus gates was not successful. - Introduce more bus gates. - Make existing bus gates 24/7. <p><i>Anti-idling</i></p> <ul style="list-style-type: none"> - Enforce anti idling for buses, with heavy fines for buses that idle. - Consideration of the extent to which existing bus lanes are causing other traffic to queue, resulting in pollution from idling engines. <p><i>Bus routes</i></p> <ul style="list-style-type: none"> - Improve bus routes to and from the rural areas. - Improve bus links between Bath and neighbouring authorities/rural outlying towns and villages, particularly at times suitable for commuters. - Overall the bus needs to be comparable to/better than a car for journeys into Bath from the surrounding areas. - Reroute buses through the city centre to reduce their impact. - Introduce a low cost/free frequent shuttle bus or circular bus service to get around the city centre. - Introduce a shuttle bus from the station to pick up points outside the town. - Improve routes to key destinations such as the hospital, University and Aztec West. - Stop cutting bus routes. - Address overcrowding and buses that run empty. - Provide shuttle buses up and down Bath's hills. - Invest in flexible/on demand bus routes. - Provide extra capacity at peak times. - Provide better bus services to the rail station, if this is going to be in the zone. <p><i>Vehicle types</i></p> <ul style="list-style-type: none"> - Ensure buses operate newer, cleaner, low emission vehicles on all routes (electric or hydrogen). Respondents saw this as capable of delivering significant improvements in air quality. - Ban high emission/diesel buses in the city centre. <p><i>Competition/operation</i></p> <ul style="list-style-type: none"> - Make the buses Council/publicly run. - Introduce a not for profit bus service. - Introduce more competition between the bus companies. <p><i>Other</i></p>

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Invest in a long-term strategy for public transport – including trams or light rail (although it was also noted that trams would affect the street scene of the WHS). - Increase promotion and publicity of bus services. - Provide more electronic real time displays. - Provide more accessible buses suitable for bikes and buggies. - Ban coaches from the city centre (see Section below). - Offer incentives for people travelling by bus, e.g. discounts in local shops. - Help to attract more bus drivers to the career.
<i>Rail</i>	<ul style="list-style-type: none"> - Trains were seen as contributing to the pollution problem and respondents called for diesel trains to be charged. - Deliver the electrification of the railway through Bath. - Encourage reopening of/new/improved rail stations and local rail services including from Saltford, Radstock/Midsomer Norton, Keynsham, Twerton, Oldfield Park, Bathampton, Hampton Row, Corsham, Box, Bradford on Avon and Westbury. - Provide additional train services/extra capacity on rail routes. - Run additional late-night services. - Encourage freight to be sent by rail. - Address overcrowding, reliability and cost. - Reopen stations and have rail and rides from these locations. - Encourage Park and Ride. - Address rail fares.
<i>Air travel</i>	<ul style="list-style-type: none"> - It was noted that aircraft contribute to the air quality issues and that this should be tackled.
<i>Improve Park and Ride</i>	<p>In addition to the general comments on public transport, respondents gave the following specific suggestions relating to Park and Ride:</p> <p>Sites</p> <ul style="list-style-type: none"> - Build the East of Bath Park and Ride. This was frequently mentioned and was seen by many as an option that may have negated the need for a CAZ. Respondents expressed strong concerns that this had not been delivered. As noted in Chapter 10 a range of organisations called for consideration of a site to the east of Bath. - Generally, create additional Park and Ride spaces/facilities. - Provide additional Park and Ride sites. Other suggestions included on the A36/Warminster Road, the A36/Lower Bristol Road and at Peasedown St John and at the M4 junction. <p>Cost</p> <ul style="list-style-type: none"> - Make Park and Ride cheaper/subsidised or free, particular need to address the cost of 2 or more people travelling together on the Park and Ride. - Instead of charging by person, charge by the car. <p>Opening hours</p> <ul style="list-style-type: none"> - Make the Park and Ride 24/7. - Ensure services run earlier in the morning and later in the evening. - Extend opening hours at the Park and Ride – the service needs to run later into the evenings. - Allow overnight parking. <p>Routes</p> <ul style="list-style-type: none"> - Improve Park and Ride routes for access to the University. - Make the Park and Ride express services.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Extend Park and Ride services at peak times, e.g. during the Christmas market. - Park and Ride routes should go right across the city, i.e. from Odd Down to the Race Course so that people do not have to get off. - Provide shuttle buses from the Park and Rides to key destinations such as the hospital. <p><i>Coaches at Park and Rides</i></p> <ul style="list-style-type: none"> - Tourist buses should drop off at the Park and Rides. - Provide Coach parking at Newbridge (like at Odd Down). <p><i>Other</i></p> <ul style="list-style-type: none"> - Better advertise/encourage use of Park and Ride using electronic roadside displays.
<i>Alternative public transport solutions</i>	<ul style="list-style-type: none"> - Invest in a long-term mass rapid transit system. - Modernise the public transport service to include trams, a metro or mono rail (although it is noted that some respondents were against a tram system). - Make use of the river.
<i>Link road/bypass</i>	<p>A wide range of comments noted the need for Bath to have a ring road, link road or bypass and expressed the view that this would better address the air quality and congestion issues, in particular the situation on London Road. Many respondents felt a solution was needed that tackled through traffic specifically. They commented that a CAZ would not be a viable solution to tackle this/should not be implemented until alternative routes for traffic are in place. As indicated in Chapter 11 a range of organisations supported this view. Without a bypass in place, respondents felt the proposed CAZ was all stick and no carrot and whilst they recognised that a bypass was a longer-term solution, they felt this was a better approach:</p> <ul style="list-style-type: none"> - Build a proper bypass or a ring road to take all the through traffic away from the town centre and make Bath a more pleasant place to live, shop and work in. - The most frequently mentioned specific route was for the A36-A46/A4 link road to take traffic, in particular HGVs, off the A4 London Road and the A36 to the Warminster Road. Respondents felt that this Scheme should have been delivered previously, and that the Batheaston bypass remained an incomplete improvement. Some felt a tunnel or underground link should be considered. - Other bypass/ring road routes were also mentioned including: <ul style="list-style-type: none"> - A northern bypass/link to the M4. - A route from Newbridge to London Road for through Bath traffic. - A western link connecting the Bristol road to the M4 avoiding Weston and Lansdown. - Better links between the A3062 and the A36. - Better links between the A363 to the A37. - Respondents commented in general terms about the need to build a tunnel or another bridge/river crossing or additional routes that would take through traffic out of the city. - Others talked in general terms about the urgent need for alternative routes, in particular north south routes, and routes from the motorway to the south of Bath. - Respondents felt that the air quality issues would only be addressed by reducing the number of vehicles (in particular HGVs) and congestion and felt that a bypass was a better option in these terms. - Respondents questioned whether a bypass would be cheaper than a CAZ and queried whether the Council had asked the Government for funding. It was felt that a bypass would be a better use of funds and a more appropriate longer-term solution.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - A bypass was seen as tackling additional issues faced by residents of east Bath, including noise, dust and vibration. A bypass would also offer relief to Bathampton village where there are currently concerns about narrow footpaths and safe access for emergency service vehicles. - A bypass was considered to impact businesses less than a CAZ. - A bypass was perceived to be a better option in terms of protecting the World Heritage status of Bath. - It was suggested that once an alternative route is in place there should be a weight restriction on Cleveland Bridge. - It was noted that Bath is one of few cities without a bypass. - It was felt that a bypass would be less disruptive and would penalise residents less. It was considered unfair that the CAZ places the emphasis on individuals to comply. - Noting that a bypass would not be delivered quickly it was suggested that as a temporary measure a one-way system should be put in place around the city centre.
<i>Improved facilities for cycling</i>	<p>A range of suggestions were made in relation to cycling. These included the following:</p> <ul style="list-style-type: none"> - Additional/improved cycle routes (particularly off-road paths and routes along safe roads) and better cycle route planning, more continuous routes and lanes that take priority over side roads. - Provide safe cycle routes into the city from each ward. - Improved maintenance of cycle paths – these should be more than a white line on the road. - Generally, invest in making Bath a safer place to travel by bike and particularly encourage the everyday cyclists. - More cycle lanes, on flat routes where possible and segregated from traffic. - More electric bikes. - Allow residents to hire bikes for free or provide interest free loans for residents to purchase electric bikes. - Provide electric bikes for hire at the Park and Ride sites. - Encourage bike riding from the Park and Rides by providing safe direct cycle routes to the city and more secure cycle parking. - Provide ways of helping cyclists get up hills (i.e. bike lifts/cable car). - Provide safe traffic free cycle routes to all schools in Bath. - Additional cycle parking. - Subsidise people to buy bikes. - Cycle training/workshops to encourage cycling, particularly for children. - Reduce levels of traffic to improve conditions for cycling. - Cycling taxis. - Better policing of traffic, to make it safer for cyclists i.e. to tackle parking in cycle lanes etc. - Reduce speeds on routes used by cyclists. - Encourage multi modal transport through bikes spaces on buses and trains.
<i>Improved facilities for walking</i>	<ul style="list-style-type: none"> - Walking should be at the centre of these proposals and should be promoted as part of a healthy lifestyle. Bath should develop a walkable city plan. - More alternative/better linked up walking routes. - Wider pavements. - Provide cable cars (as previously proposed). - More pedestrian priority/better crossings (although some respondents felt that pedestrian crossings interrupt the free flow of traffic).

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Improve pedestrian underpasses. - Generally, make the city more walkable. - Improve walking routes along the riverside. - Encourage walking by slowing traffic. - Provide street lights for those walking at night. - Also see comments on pedestrianisation.
<i>Parking</i>	<p><i>Residents parking</i></p> <ul style="list-style-type: none"> - Expand the residents parking Scheme to prevent commuter car parking, particular mention of Oldfield Park, Junction Road, Chelsea Road, Twerton, Lansdown, Moorland Road, Larkhall, Wellsway, Rosemont Lane, Greenway Lane, Lyncombe Vale and Perrymead area and London Road. It was suggested that all areas within 30 minutes' walk of the city centre should be covered, or that all areas should be covered to the Park and Ride sites. - If the CAZ goes ahead, consider the impact of parking on areas at the boundary of the zone. - Offer free parking permits to residents. - Make the central zone residents only (rather than shared with pay and display). - Stop giving residents permits to hotels. - Employ more parking enforcement staff. - Restrict parking in residential areas to one hour per day to prevent commuter parking. - Allow residents to park in the city centre for free for one hour. - There was some concern about residents parking areas being split, part in, part out of the CAZ. <p><i>Other parking</i></p> <ul style="list-style-type: none"> - Provide more/cheaper parking on the edge of the city centre to encourage park and walk. - Various comments were made on the quantity of city centre parking with some suggesting the volume of city centre parking should be reduced (or some car parks closed) to encourage use of Park and Ride and to discourage people from driving into the centre. However, some suggested there should be more parking to help reduce the need for looping around/extra miles looking for a space. - Various comments on parking charges with some suggesting parking charges should be lower to offset the CAZ charges and others feeling parking charges should be higher to discourage traffic. - Make parking more expensive for higher emission vehicles and free for electric vehicles. - Give parking priority to the least polluting vehicles. - Harsher penalties for people who block main roads with inappropriate parking. - Limit number of cars for houses in multiple occupation. - More motorcycle parking. - Remove/reduce the amount of on street parking. It was suggested that this would aid the free flow of traffic. Parking outside Westgate Buildings highlighted as a particular problem. - Include a tourist tax on parking/make it harder for day visitors to park. Continue to charge residents less/don't disadvantage residents. - Withdraw Councillors parking permits. - Charge for parking on Sundays. - Tax workplace parking.

Type of alternative suggestion	Detail given/suggestion made
<i>Bus lanes/gates</i>	<ul style="list-style-type: none"> - Remove bus lanes, for example on London Road and bus gates as these slows down vehicles/reallocate this space to cars. - Turn bus lanes into lanes for low emission vehicles. - Restrict buses and coaches in the centre/on through routes at certain times. - Allow buses only on an increased number of streets using bus gates. - On key routes have 3 lanes, with bus lane working with flow of majority of traffic (e.g. into Bath in the morning and out in the evening). - Review hours of operation of existing bus gate.
<i>Traffic signals and traffic flow</i>	<ul style="list-style-type: none"> - Remove unnecessary sequences and better sequence traffic lights to avoid stop/start traffic. Synchronise traffic lights with pedestrian crossings and generally improve the flow of traffic. Particular mention of London Road and the area around the bus station/Southgate car park. Make London Road an urban freeway. - Rearrange London Road/Cleveland Place junction to create a shared space. - Use more intelligent traffic light systems. - Replace traffic lights with roundabouts to keep traffic moving. - Ensure traffic lights respond to peaks e.g. to allow everyone to get out of the city at the end of the day. - Space out pedestrian crossings, too many close together hold up the traffic. Reduce pedestrian crossings on main roads. <p><i>Traffic flow</i></p> <ul style="list-style-type: none"> - General comments about upgrading/re-planning roads and keeping traffic moving/ensuring a smoother flow of traffic, particularly on the A4 and the A36. - Suggestions to remove bus gates and bus lanes and bus stops to improve traffic flow. - Suggestions to change the entrance/exit to the bus station or bus the location of the bus station. - Address narrow points/pinch points, for example on Junction Road. - Improve London Road/Cleveland Place junction to improve flow. - Make London Road a dual carriageway. - Reroute all traffic around the city centre/create a ring road. Some suggested this should be a large one-way system. - Improve the roads that take traffic around and away from the city. - Open the road from the Upper to Lower Bristol roads (by the Western Riverside development).
<i>One way</i>	<ul style="list-style-type: none"> - Introduce a one-way system in parts of the City. For example, through Queen Square and around Widcombe. - Change the one-way system at the bus station (swap it around). - A one-way system was seen as a potential alternative to a bypass or ring road – taking traffic around the city centre.
<i>Traffic calming</i>	<ul style="list-style-type: none"> - Mixed views on traffic calming. Some felt it should be removed to aid traffic flow, particularly where this requires sharp braking and acceleration, others thought more areas of the city should be traffic calmed. - Mixed views on 20 mph areas, some felt these should be removed/should only be in the highest risk areas and saw 20 mph areas as inefficient for fuel. Others thought they should be expanded to cover additional areas of the city and be better enforced. - Reduce traffic speeds. - Support for 20 mph around schools etc. - Make specific roads access only. Specific mention of Dorchester Street.

Type of alternative suggestion	Detail given/suggestion made
<i>Other traffic management measures</i>	<p><i>Anti-idling</i></p> <ul style="list-style-type: none"> - Enforce a ban on idling engines/anti-idling zones, especially buses and coaches. <p><i>HGV routeing</i></p> <ul style="list-style-type: none"> - Take HGVs out of the city centre. - Add weight limits to key routes including London Road and Camden. - Restrict HGVs at certain times/encourage off peak deliveries. - Consider lanes just for HGVs. <p><i>Roadworks</i></p> <ul style="list-style-type: none"> - Better plan/co-ordinate roadworks. - Do roadworks at night. - Fines when roadworks over run/carefully monitor contractors. <p><i>Alternative routes</i></p> <ul style="list-style-type: none"> - Generally, respondents commented that Bath needs another bridge. - Various views on the toll bridge. Some suggested removing the toll, whereas others suggested increasing the toll to prevent it being used as an alternative route. - Provide additional east/west and north/south links. <p><i>Other</i></p> <ul style="list-style-type: none"> - Introduce 2+ lanes. - Develop a comprehensive Bath transport plan. - Improve the roads/road maintenance. - Improved signage and road markings. - Better signposting of diversion routes. - Improve infrastructure on other roads – e.g. the toll bridge and the B3110. - Reclassify the A roads to discourage traffic from passing through Bath/to encourage traffic to keep to the motorway. - Reclassify the B3111 to an unclassified road. - Better planning and coordination of roadworks to prevent congestion and of occasional events that impact traffic flow, including University change over weekends and the Christmas Markets. - Ban through traffic. - Reconsider the location of the bus station.
<i>Tourism/tour buses</i>	<p>Respondents acknowledged that Bath's success as a tourist destination brings with it a number of challenges and suggested that the following should be considered to manage the impact of tourism on air quality and traffic:</p> <ul style="list-style-type: none"> - Reduce/restrict number of tour buses and coaches. - Restrict unofficial tour buses. - Prohibit tour buses from the city centre. Particular concern about tourist buses on Terrace Walk. - Limit number of tourist buses (as many run empty). - Provide more coach parking/allow coach parking at other Park and Ride sites. Coaches should drop off at the Park and Ride and transfer passengers to smaller electric buses. Or drop tourists at railway stations outside of Bath so that they come in by train. - Charge coaches more. - Introduce a tourist tax (although also concerns that a tourist tax and CAZ charge would impact the tourist trade). - Enforce coach parking to ensure they are parked only at designated sites (not on the side of the road).

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Ban high emission/non-compliant coaches. - Do more to advise tourists to travel by rail or Park and Ride. - Ban coaches from idling in the centre.
<i>Taxis</i>	<ul style="list-style-type: none"> - Make all taxis zero emission/electric. - Ban non-compliant taxis.
<i>Schools and student travel</i>	<p>School traffic was identified as a particular issue and the following were suggested to help manage the impact of the school run:</p> <p><i>Schools</i></p> <ul style="list-style-type: none"> - Introduce more school buses, particularly for primary school children. - Provide free travel for students on buses and trains. - Discourage/limit parents driving children to school. Encourage them to drop at school bus pick up points. - Run campaigns/work with schools and PTAs to encourage walking and cycling to school. - Provide free buses at school pick up/drop off times. - Reward pupils who walk/cycle to school. - Improve walking and cycling routes to schools. - Particular note of school traffic related problems in Larkhall. - Create drop off points for private schools, and bus students in from these. - Set up walking buses with staff to supervise children. - Stagger school start times. - Encourage car share on the school run. - Use school mini buses for the school run. - Change admissions system to encourage choice of schools within walking distance and encourage parents to choose their local school. - All school children to use Park and Ride buses free of charge. - Charge large (new) cars that do the school run. - Create zones around schools where no parking/drop off is allowed. - Invest in cycle training for school children. - Charge school run traffic. - Ban all school traffic. <p><i>University</i></p> <ul style="list-style-type: none"> - Cut down on the amount of student accommodation in the city centre/grant less permissions or multi occupancy developments. - Cut down on the number of University buses. - Restrict/prevent students from having cars in the city and move student housing closer to the University. Incentivise students not to bring cars. - Manage traffic better on University accommodation change over weekends. - Student buses were perceived as adding to the air quality problem. - Encourage more students to live on campus/provide more accommodation on campus so that they do not need a car.
<i>Low emission and electric vehicles</i>	<p>Encouraging electric vehicles was seen as an important aspect of Scheme proposals:</p> <p><i>Charging infrastructure</i></p> <ul style="list-style-type: none"> - Expand infrastructure, charging points etc for electric vehicles. - Install public charging points on every road and in all Council car parks. - Encourage hydrogen as an alternative fuel. Provide infrastructure to support change of fuel – i.e. hydrogen fuelling stations. - Consider LPG and SCR technology to treat exhausts.

Type of alternative suggestion	Detail given/suggestion made
	<p><i>Access and parking</i></p> <ul style="list-style-type: none"> - Make one city centre car park for electric vehicles only. - Make the central zone/certain streets accessible to low emission/electric vehicles only. - Give priority to electric vehicles for example in car parks and through use of priority lanes. - Reduce parking charges for electric vehicles. <p><i>Public vehicles</i></p> <ul style="list-style-type: none"> - Ensure all commercial vehicles, buses etc are electric. - Make all buses and taxis electric. - Ensure all Council vehicles are emission free. - All recycling lorries should have start/stop engines. - Use electric vehicles to run a shuttle service from Park and Rides and also to do deliveries. <p><i>Support and advice</i></p> <ul style="list-style-type: none"> - Regardless of whether a CAZ goes ahead, respondents felt that there should be financial support, advice and encouragement to people to switch to lower emission vehicles. - Introduce incentives and financial support for people to buy new cleaner cars and electric bikes.
<i>Anti-idling</i>	<ul style="list-style-type: none"> - Encourage anti idling (switch of engines when stationary) but also some concern that switching on/off whilst moving in a slow a queue of traffic is counterproductive. - In particular ensure buses, coaches and taxis do not idle. - Make sure the system is enforced (use parking enforcement staff/pass a by-law). - Increase the fine for anti-idling. - There was some concern over the benefits of idling for different engine types.
<i>Motorcycles</i>	<ul style="list-style-type: none"> - Encourage motorcycling with safe routes and more parking. - It is noted that other respondents would like motorbikes to be included within the charge or to ban motorbikes.
<i>HGVs/deliveries</i>	<p>Respondents identified HGVs as contributing to the air quality issues. Many commented that HGV volumes should be reduced by any means possible. The following specific suggestions were noted:</p> <p><i>Charging strategies</i></p> <ul style="list-style-type: none"> - Charge HGVs first before charging cars or charge only HGVs. - Charge HGVs at specific points. - Increase the proposed CAZ charge for HGVs to discourage them more. - Charge HGV through traffic more. <p><i>Restricted access/routeing</i></p> <ul style="list-style-type: none"> - Ban all/reduce volume of HGVs in the city centre and on the A4/A36 as the priority first step. Respondents saw heavy vehicles as the biggest problem. - Ban higher emission/diesel lorries/refuse collection vehicles. - Add weight restrictions to some roads for example Cleveland Bridge, Lansdown Road, Bathwick Hill, Pennyquick, Whiteway Road, Rush Hill, Monkton Combe viaduct, London Road or parts of the A4/A36. - Ban all HGVs that are not delivering to the central area/check that all have a legitimate destination in the city (ban HGVs from using Bath as a through route). - Encourage HGVs to use alternative routes, such as the A350 and M4. - Encourage supermarkets to manage timing of deliveries.

Type of alternative suggestion	Detail given/suggestion made
	<p><i>Access control</i></p> <ul style="list-style-type: none"> - Encourage deliveries outside working hours/overnight. - Limit times of access for HGVs/ban HGVs from the city during specific times, such as during rush hours. <p><i>Freight transfer</i></p> <ul style="list-style-type: none"> - Set up a depot/transfer station on the edge of the city centre allowing HGVs to consolidate their loads and have these taken into the city centre by a short haul electric fleet. - Encourage local delivery vehicles to be electric i.e. electric vans. - Better/clearer routes are needed for HGVs - Work with Wiltshire to develop HGV routes. - Encourage HGVs to use the motorway. - Retrofit/clean up HGVs as the priority. - Provide a route to allow HGVs to avoid Bath. - Encourage use of rail freight. - Allow only small delivery vans in the city centre. - Various other delivery strategies were suggested by individual respondents.
<i>Car sharing</i>	<ul style="list-style-type: none"> - Tackle single occupancy car use. - Expand car clubs. - Provide more support for car sharing, for example by providing support similar to that given for school travel plans. Specific mention of the RUH. - Have specific car sharing car parks, where profit is reinvested in sustainable transport.
<i>Car free days</i>	<ul style="list-style-type: none"> - Create car free zones at key times – e.g. during the Christmas markets. - Have occasional car free days/weekends.
<i>Incentives to buy new cars</i>	<ul style="list-style-type: none"> - Provide financial support and incentives to encourage people to change their car. It was suggested that this should be offered instead of a CAZ, to actively encourage positive change. - Support people rather than charge them. - The funds that would otherwise pay for the CAZ should fund grants.
<i>Publicity/incentives</i>	<ul style="list-style-type: none"> - Increased efforts to encourage people who work in the city centre to use public transport and walk/cycle options. - Work with employers to encourage cycling/walking to work. - Encourage employers to do more to encourage alternative modes etc. - Given incentives/discounts to people travelling by bus etc. - Publish emissions levels daily. - Encourage people to monitor air quality in their own areas. - Encourage people to buy locally produced goods to cut down road miles. - Promote/encourage home working. - More education on air quality and publicity of health benefits of alternative modes. - Raise awareness of issues caused by short trips/single occupancy trips. - Provide facilities for luggage in town i.e. lockers. - Car scrappage schemes.
<i>Planning</i>	<p>More joined up transport and land use planning, and more cross boundary planning. Stop developments in the city until infrastructure is in place.</p> <ul style="list-style-type: none"> - Do not allow proposed parking at Rugby ground. - Relocate the Rugby ground. - Prevent new housing development along major routes.

Type of alternative suggestion	Detail given/suggestion made
	<ul style="list-style-type: none"> - Develop a combined air quality/congestion plan. - Encourage businesses to locate outside of Bath to reduce traffic in the city centre. - Overall strategy to reduce amount of goods transported by road. - Provide more central housing so people can live close to their place of work, particularly for key workers. - Move car showrooms out of the city centre. - Provide better facilities in rural areas, to reduce the need to use the city centre. - Reduce the number of students and tourists in the city. - Ensure new developments have their own shops and facilities so that people do not need to travel. - Provide petrol stations outside of the city centre. - Provide more housing and jobs in the city centre to prevent the need to travel.
<i>Householder level suggestions</i>	<ul style="list-style-type: none"> - Ban bonfires. - Monitor household chimney emissions/ban solid fuel fires.
<i>Other suggestions</i>	<p>A range of other suggestions were put forward:</p> <ul style="list-style-type: none"> - Plant more trees along roads. - Encourage working from home/flexible working. - Prevent smoking in all public places. - Wider Scheme needed to retrofit all older vehicles. - Consider traffic management via Artificial Intelligence based solutions. - Consider other sources of emissions e.g. agriculture and fireworks. - Have roadside checks to stop vehicles emitting exhaust fumes in areas with poor air quality. - Make Councillors use public transport. - Support better community transport. - Look at methods used in other countries for example large fans to blow pollution away from houses or large pumps/filters. - Tackle pollution from aircraft and large ships. - Target polluting boats. - Supplement the CAZ with other zones elsewhere across B&NES.

14.4 Comments relating to business in Bath

14.4.1 Quantitative feedback

There were no closed questions on this topic, therefore all feedback was qualitative.

14.4.2 Qualitative feedback

A range of business respondents commented on alternative approaches that could be taken, these are shown in Table 13-2 below. Many of these comments overlap with suggested supporting measures, reported in Chapter 11.

Table 14-2: Alternative approaches to the Scheme suggested by businesses

Alternatives	Comments/details given
<i>Buses and wider public transport</i>	<p>A wide range of improvements to public transport are required either instead of or in addition to the CAZ, as part of a broader plan. It was felt that these improvements would help to support their business operations by improving the quality of life for staff and visitors to the city, in relation to the health benefits and cost savings as a result of cheaper fares. Comments included:</p> <ul style="list-style-type: none"> - Make better use of the river and introduce a water taxi service. - Lower price or free bus services. - More rural bus services. - Upgrade to cleaner buses/electric buses or retrofit buses to decrease emissions. - Remove buses from the city. - Move bus station out of the city. - Limit number of coaches in city. - Reduce bus lanes. - Put benches in the bus station. - Tram system. - Horse and carts.
<i>Taxis</i>	<p>Suggestions to help business in Bath included:</p> <ul style="list-style-type: none"> - Free taxis. - Move the taxi rank for the rail station to Widcombe.
<i>Park and ride</i>	<p>Respondents felt that improved Park and Ride services would make it easier for customers to access their services and for staff to travel to work without relying on car usage. Comments and suggestions for improvements included:</p> <ul style="list-style-type: none"> - Increase the number of Park and Ride sites and capacity at existing sites. - Suggestions for additional Park and Ride sites: Eastern Park and Ride; on Bradford on Avon side of Bath; on London road; along the original Bristol to Bath Cycle route - Improved Park and Ride on all entry points to the city. - Free Park and Ride. - Better promotion of Park and Ride to visitors and local residents. - Introduction of a river Park and Ride.
<i>Rail</i>	<p>Suggestions to help businesses included:</p> <ul style="list-style-type: none"> - More train services to Oldfield Park. - Provide an effective drop off point for Bath Spa Train Station south of the river.

Alternatives	Comments/details given
<i>Cycling and walking</i>	<p>Many business respondents felt that improved walking and cycling facilities in Bath would help staff to travel to work sustainably. This would also enable visitors and customers to access their services using sustainable transport modes and help to reduce car usage across the city. Comments and suggestions included:</p> <p><i>Walking</i></p> <ul style="list-style-type: none"> - Pedestrian only areas. - Improve walking environment for pedestrians. <p><i>Cycling</i></p> <ul style="list-style-type: none"> - Increased provision for cycle ways. - Improve safety for cyclists by providing safe and separate cycle routes across the city. - Prevent cycling up hill on Lansdown Road, Bathwick Hill and Wellsway from 8am to 7pm because it holds up traffic and increases pollution.
<i>Parking</i>	<p>Some business respondents mentioned parking as a way to improve air quality in Bath. Suggestions included:</p> <ul style="list-style-type: none"> - More out of town car parks (potentially also closing those in the city centre). - Stop B&NES vehicles parking in city centre. - Remove all on street parking from main routes like A367.
<i>Bypass around Bath, A46/36 link</i>	<ul style="list-style-type: none"> - The need for a bypass either alongside a CAZ or as an alternative would help those needing to travel through the city. Most common suggestion was for A46-A36 link road.
<i>Traffic flow/infrastructure</i>	<p>It was felt that current traffic management in Bath was a driving factor behind poor air quality. There were suggestions relating to improved traffic management as a way to reduce pollution in Bath. Suggestions and comments included:</p> <ul style="list-style-type: none"> - Improve traffic flow – remove 20 mph speed limits. - Traffic management aimed at reducing rat runs will have a negative impact on those living in or near the city centre. - Reduce congestion. - Open bus lanes. - Bus stop placement causes traffic build up. - Small flyover at Red Lion and Globe roundabouts. - Change one-way system around forum/bus station/Avon Street. - Anti-idling enforcement. - Out of town parcel depot for courier firms to prevent vans in the city with a switch to electric vans when needed. - Provide a route around the city charge free. - Reroute HGVs transiting the city. - Build a tunnel/bridge.
<i>Cleaner vehicles</i>	<p>There were suggestions to encourage the use of cleaner vehicles by businesses and the general public in Bath. Comments and suggestions included:</p> <ul style="list-style-type: none"> - Offer incentives to change to cleaner vehicles. - Provide more electric charging points in Bath. - Hydrogen fuel should be more widely advertised and available. - Make buses, delivery vans and taxis electric. - Encourage uptake of non-diesel HGVs e.g. Biomethane or electric. - Subsidise the fitting of filters for older diesel vehicles.

Alternatives	Comments/details given
<i>Restricting Traffic</i>	<p>Some businesses suggested restricting traffic as an alternative to charging vehicles. Suggestions included</p> <ul style="list-style-type: none"> - Pedestrianise Bath. - Pedestrianise Milsom Street. - Limit trade deliveries between 7 and 10 am. - Ban HGVs in city centre. - Have a vehicle free day. - Ban all vehicles, use horses instead. - Alternate days for vehicle access. - Vehicle free Sundays. - Gradually phase out all vehicles from the city centre except commercial traffic. - Ban tourist buses. - Replace tourist buses with tuk tuks.
<i>Other</i>	<p>There were a range of other suggestions by business respondents as alternatives to the proposed Scheme. These included:</p> <ul style="list-style-type: none"> - Should consider a congestion charge. - Promote car share Schemes. - Cancel the Christmas market. - All retro-fitted vehicles should be allowed in the zone. - Open fires should be banned. - Large scale tree planting programme. - Ban BBQs and burning of garden waste.

14.5 Next steps

Given the volume of feedback received it is not possible to respond to every comment raised in this Chapter. Therefore, in identifying the work required to respond to issues raised, it is important to take a proportional approach which focusses on issues most relevant to the overall objectives of the project. In this context it will be particularly important to:

- Review previous statements on, and further examine as appropriate, the feasibility of a Class C CAZ; for example, if combined with other measures or with traffic management.
- Restate the reasons why a wider congestion charge is not currently being pursued.
- Restate the reasons why the required air quality improvements cannot be met through focus on improvements to buses, coaches, school travel, Park and Ride, traffic management, walking and cycling (i.e. non charging measures only).
- Explain why wider infrastructure improvements, including A36-A36 link road and the east of Bath Park and Ride are outside the scope of this project, and confirm the Council's overall position on these issues.

15. Comments from Groups and Organisations

15.1 Overview

The key themes arising from the comments made by groups and businesses, either via the questionnaire or letters and emails have been summarised alongside all the other responses and included within Chapters 7-14. However, to capture these views more clearly, and to show where specific comments have the weight of a group behind them, a high-level summary of the main issues by each of the larger groups via questionnaire, letter or email is presented below. Responses from businesses are generally not included here (except in the case of larger businesses) for confidentiality reasons (but their comments are reflected in previous Chapters).

It should be noted that in some cases it has not been possible to establish whether all are formal responses as some are submitted by members speaking informally on behalf of a group they belong to. Many of the submissions received were lengthy documents; therefore, this Section seeks only to provide a flavour of the main points raised. The Council will continue to reference the original submissions, as appropriate, as the project progresses.

15.2 Comments from political parties

Table 15-1 summarises the comments submitted by various political parties. Responses received from individual Councillors are not included below but are reflected in the summaries presented in previous Chapters.

Table 15-1: Comments from political parties

Group	Via	Issues raised
B&NES Green Party	Q & L	<ul style="list-style-type: none"> - Concern about the most polluting vehicles diverting down residential streets around the zone only displacing pollution. - Propose that the built-up area of Bath be included (allowing people to access the Park and Rides). - Request any residential streets remaining outside the zone have an RPZ and these funds should be used to subsidise bus fares from surrounding villages. - Charge should be £10 to increase revenue and be reduced when no public transport options are available near the address of the vehicle owner, revenue to be used to improve public transport in times when there are no options. - Thinks the charge should only cover for 6-hour period (not 24-hours) to stop people commuting in by car, followed by an additional 20% surcharge for every hour in the zone. - A concession should be provided in form of a few 'free goes' driving into the zone a year allowing hospital trips and bulky item collection. - Supports an exemption for pre-Euro 4 petrol vehicles. - Does not support an exemption for historic vehicles due to large emissions. - There should be no exemption for any diesel vehicles due to Nitrogen Oxide (NO_x) production compared to petrol vehicles. - Thinks the most effective ways to deal with this problem would be to encourage modal shift through: <ul style="list-style-type: none"> - Improvements to public transport including introduction of trams/light rail on busy routes with zero emissions - buses/taxis/car clubs in less dense areas. - Better walking/cycling routes

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Prioritisation of all other traffic over motor vehicles in future city and road planning. - Congestion Charge should be introduced for all vehicles, charged per kilometre travelled within zone based on vehicles average emissions.
B&NES Labour Group Councillors	Q	<ul style="list-style-type: none"> - Concern of effects on low income people. - Concern for lack of options for people driving for healthcare appointments. - Concern around disproportionate benefits between Bath residents and north-east Somerset residents.
B&NES Liberal Democrats	L	<ul style="list-style-type: none"> - Agree that urgent action is needed to tackle air quality in Bath. - Have significant concerns regarding a Class D CAZ and the disproportionate impacts it could cause, including on small businesses and lower income groups. Further consideration of mitigation of these impacts is needed. - Support proposed financial support to help people change their vehicle. - Consider urgent action is needed to expand public transport options. - Concerned that residential areas on the periphery of the zone will be adversely affected. - Consider the Class D CAZ has missed the opportunity to tackle wider problems, including congestion. - Oppose decision by Government to retain % of charges as this money could be used to help with necessary mitigations.

15.3 Comments from local authorities

Table 15-2 summarises the comments submitted by neighbouring local authorities:

Table 15-2: Comments from local authorities

Group	Via	Issues raised
South Gloucestershire Council	L	<ul style="list-style-type: none"> - Support proposals for a Class D CAZ - Feel proposed charges seem reasonable to encourage drivers of higher emission vehicles to use alternative means of travel or change their vehicle. - The range of supporting measures seems balanced. - Recognise that the CAZ would have beneficial impacts on journeys within South Gloucestershire.
Wiltshire Council	L	<ul style="list-style-type: none"> - Support objective led approach and acknowledges that a CAZ is a practical way to deliver air quality improvements in the shortest time. - Concerns around displacement effect of the CAZ and that consideration of these issues is weak. Consideration of displacement is particularly important for West Wilts towns because diversion routes through Westbury and Bradford on Avon already have poor air quality. Wish to see assessment of these impacts more reliably forecast. Detailed comments provided on issues relating to the Stated Preference Surveys. - Acknowledges uncertainty within models and wishes to see this taken into account. Detailed comments on modelling provided. - Specific request to test Class C with higher charges. - Wishes to see systematic evaluation of the performance and consequences of the CAZ which extends to areas outside of Bath. - Wishes to see the Clean Air Plan be able to respond to real world impacts. - Specific request to consider the impact of a Bristol CAZ - Detailed feedback on buses provided.

15.4 Comments from Town and Parish Councils

Table 15-3 summarises the comments submitted by Town and Parish Councils. Responses received from individual councillors are not included below but are reflected in the summaries presented in previous Chapters.

Table 15-3: Comments from town and parish councils

Group	Via	Issues raised
Individual Parish & Town Councils		
Batheaston Parish Council	L	<ul style="list-style-type: none"> - Support CAZ but have concerns about knock on effects and potential rat running and particularly that traffic will increase on the toll bridge. - Would like reassurance that pollution and congestion levels on the High Street (Bathampton) will not increase. - Concern that the charges will be too expensive for those on low incomes. - Would like the zone extended to capture the Toll Bridge roundabout, would also support an extension to cover Bathampton Village, Warminster Road and North Road. - Wish to see good advanced signing of the zone, - Support additional measures to improve public transport.
Bathampton Parish Council	L	<ul style="list-style-type: none"> - Recognise the need to improve air quality in and around Bath. - Concern about the traffic modelling work in the Bathampton area and that this does not fully reflect the diversionary impacts in this area, especially increased use of the toll bridge. - Concern that traffic will route via the toll bridge to avoid entering the CAZ at Cleveland Place. Also concern about increased pressure for parking. - Note that possible solutions include extending the zone to include Bathampton, or to the bottom of Warminster Road/North Road or adding a CAZ 'bubble' on Mill Lane or making the CAZ boundary the same as the WHS boundary. - Note that including all of Bathampton would have implications for residents and visitors, particularly given the poor public transport.
Bitton Parish Council	Q	<ul style="list-style-type: none"> - Concern for shift workers in city overnight who would be charged twice. - Concern that traffic may shift to other villages in South Gloucestershire and in particular for additional traffic on single track lanes north of Bath as these are not suitable for increased traffic.
Bradford on Avon Town Council	Q & L	<ul style="list-style-type: none"> - Concern related to the wider potential impacts of the CAZ. - Concern that more polluting vehicles will divert through Bradford-on-Avon and other local towns and wish to see a review of the CAZ to ensure that it is not moving the problem elsewhere. - Does not wish to see access to the RUH restricted and supports concessions for those attending RUH and local schools. - Requests for a smaller zone concentrated on the centre. - Suggests the Government should target vehicle manufacturers and develop vehicle upgrades, rather than charging the public. - Requests alternative route suggestions for uncompliant vehicles. - Requests delaying the implementation to allow construction of an A46-A36 bypass and contacting vehicle manufacturers.

Group	Via	Issues raised
Camerton Parish Council	L	<ul style="list-style-type: none"> - Appreciate the need to reduce air pollution. - Camerton has poor public transport to the city centre so many residents have no alternative but to drive. - Park and Ride needs to be open much longer than it is currently. - Concern over economic impacts to Bath - many parishioners will shop/socialise elsewhere.
Charlcombe Parish Council	L	<ul style="list-style-type: none"> - Concern over increased traffic seeking alternative routes to avoid the CAZ. In particular note issues on Charlcombe Lane, Colliers Lane, Langridge Lane and Wooley Lane. - Suggest a staged approach to the CAZ, starting with a Class C. - Impact on rural communities is a concern due to lack of alternative transport links.
Claverton Parish Council	L	<ul style="list-style-type: none"> - Support Class C with a possibility for Class D implementation if compliance is not on target. - Notes that air quality will improve naturally over time and CAZ Class D will have significant impacts on suburban residents. - Feels that a Class C would reduce rat running and be less punitive to owners of older vehicles.
Compton Dando Parish Council	L	<ul style="list-style-type: none"> - Concern about the impact of a CAZ on rural communities. - Notes that public transport services from the village are limited and car parking prices in Bath are already high especially when coupled with CAZ charges. - Concern that when delivery vehicles incur a charge this will be passed on to businesses.
Combe Hay Parish Council	L	<ul style="list-style-type: none"> - CAZ makes certain north-south trips impossible without crossing the CAZ boundary. - Non-compliant cars are likely to be driven by poorer members of society and pensioners. These people will find it difficult to replace their vehicle and the incentives suggested by B&NES are not likely to help them. - Non-compliant diesels may be relatively new and have the potential to be used for many years. Incentives should reflect the economic value of the vehicle being changed. - Public transport needs to be improved. - Walking and cycling are not always appropriate for some residents. - Does the CAZ really need to operate 24 hours per day? - The boundary includes Bath train station and bus station which may discourage some people from outside the zone using public transport. - There needs to be balance between air quality and economic factors. - The proposed CAZ should focus on commercial vehicles.
Heywood Parish Council	L	<ul style="list-style-type: none"> - Suggest excluding the junction of London Road and Cleveland Place and using the river as the southern boundary of the zone. - Extended Park and Ride hours are needed.
High Littleton Parish Council	L	<ul style="list-style-type: none"> - Recognise that something must be done about air pollution. - CAZ revenue must be used for further mitigation actions. Note that public transport in rural areas needs to be improved. - Concerned that the CAZ will disproportionately affect rural communities, especially the rural poor. - Would like to see Park and Ride operating hours extended sooner than 2021.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Concern that the CAZ will cause local shoppers to stay away, leading to economic impacts on the shops. - Important that mitigation is provided for all sections of society.
Hilperton Parish Council	Q	<ul style="list-style-type: none"> - Wish to see a direct route provided from West Wilts to the RUH. Suggest excluding Brougham Hayes junction from the zone to allow RUH access from the South. - Would like to see Cleveland Bridge/London Road excluded from the CAZ to stop vehicles diverting through Hilperton and other villages.
Hinton Charterhouse Parish Council	Q	<ul style="list-style-type: none"> - Implement the CAZ in stages to help those unable to upgrade their vehicle. - Concern about additional HGVs being diverted through the Hinton Charterhouse. - Concern about commuters parking in the village before taking public transport. - Request that traffic through the village is monitored and if increases levels are noted as a result from the CAZ then mitigation measures are implemented to solve the issue. - Support clean/healthy air in general.
Keynsham Town Council	L	<ul style="list-style-type: none"> - Concerned that a Class D CAZ is the only option consulted on and doubtful whether it's the only option to achieve the desired results. - Suggests adopting a Class B or C for 6 months and monitoring progress. - Concern that a Class D CAZ will disproportionately impact groups including the lower paid, elderly, hotel/hospital workers, and shift workers. - Keynsham has a high proportion of residents over the age of 65 and many of them will have older cars. - Concerned about the impact of scrapping vehicles on individual's finances and the environment. - Inclusion of the A36 and A4 will result in people traveling from Chippenham to the RUH incurring a charge. - Suggest a direct bus service between Keynsham and the RUH to support Keynsham residents who currently have to drive to Odd Down. - Note that the Town Council's ground maintenance transit vans will not be able to offer assistance to B&NES parks, once CAZ is implemented due to the CAZ charges. The Town Council will have to make a decision about whether it can justify using taxpayer's money to refund the clean air charges for those Staff and Councillors on official Council business.
Melksham Town Council	L	<ul style="list-style-type: none"> - Concern about residents from West Wiltshire reaching RUH in particular. - Concern about diversionary impacts for towns and villages outside the boundary, particularly along the A350. - Would like a Park and Ride site on Wiltshire side of Bath.
Melksham Without Parish Council	Q & L	<ul style="list-style-type: none"> - Boundary should not include the A4/A36 or the junction of Brougham Hayes and the Lower Bristol Road - Concern that other areas of the boundary will result in dangerous turning points - Support proposals submitted by Trowbridge Town Council

Group	Via	Issues raised
Midsomer Norton Town Council	Q	<ul style="list-style-type: none"> - Support a Class C and suggest a Class D could be implemented at a later date if needed. - Concern for about Midsomer Norton residents accessing motorway/hospital/commuting. - Registered blue badge holders, healthcare providers and community transport providers should have a permanent exemption.
Monkton Combe Parish	L	<ul style="list-style-type: none"> - Believe that air pollution will improve naturally over time. - CAZ C preferred over Class D. - Traffic management measures should be given more consideration.
North Bradley Parish Council	Q	<ul style="list-style-type: none"> - Exclude A46 and A36 until a bypass is constructed.
Radstock Town Council	Q	<ul style="list-style-type: none"> - Support the CAZ in principle. - Concern for effects on care workers, shift workers and particularly night workers who may have to pay twice as a result. - Support a scrappage Scheme for eligible vehicles. - Concern for access to RUH and Bath Spa, specifically when public transport alternatives are not available. - Concern for access from Radstock to the M4.
Saltford Parish Council	L	<ul style="list-style-type: none"> - An unintended consequence of the CAZ would be an increase in congestion along tax-free routes through Bath, this will impact on noise and air quality along these routes. - Tradespeople should be allowed to travel uncharged unless they are expected to pass the cost on to customers - CAZ is a blunt instrument to price people out of their cars before infrastructure is provided. - CAZ is viewed as a tax on those that can least afford it. - CAZ justifies re-opening Saltford train station.
Southwick Parish Council and Southwick Residents Association	Q	<ul style="list-style-type: none"> - Support the principle but concerned about the impact it will have on neighbouring areas, in terms of higher traffic volumes and degraded air quality. - Concern about patients accessing the RUH from Trowbridge, Westbury etc. where public transport options cannot replace car trips. - Urge B&NES to look holistically and not in isolation to other surrounding cities, towns and villages. - Support north-south bypass.
South Stoke and Midford Parish Council	Q	<ul style="list-style-type: none"> - Would like to see the proposed CAZ boundary extended up the Wells Road to Midford Road and then extended out along from the Red Lion and Glasshouse roundabout systems to include Rush Hill, Frome Road, Bradford Road, and North Road. - Concern regarding potential impact of increased traffic on adjacent routes due to large number of schools, residential developments and current traffic levels. - Concern about impact on elderly residents. - Concern that the charges will generally not result in upgrades to cars and drivers will seek ways of avoiding the zone. - Would like to see an exemption for Euro 4/5 diesel vehicles with low annual mileage (especially for elderly residents). - Suggest B&NES should provide financial support for schemes such as Dial-a-Ride.

Group	Via	Issues raised
South Wraxall Parish Council	Q & L	<ul style="list-style-type: none"> - Supportive of reductions in air pollution in general. - Concern about the potential increased traffic through surrounding towns and villages, including South Wraxall.
Timsbury Parish Council	Q	<ul style="list-style-type: none"> - Routes that are used for driving around Bath must not be included in the zone. Concern that including these routes will lead to rat running because people will not be able to afford to replace their car and public transport alternatives from locations like Timsbury are inadequate and getting worse due to cuts. - Residents from rural areas without suitable public transport should have a concession. - Notes that poorer drivers cannot afford to change their vehicle and feel that the CAZ discriminates against those people who live in areas without adequate bus services and does not take account of the closure of some rural bus services. - Would like to see a properly funded and managed integrated transport system.
Trowbridge Area Board	Q & L	<ul style="list-style-type: none"> - Feel that the CAZ should exclude the Cleveland Bridge/London Road section as this is the primary route to the M4. - Concern about access to the RUH and the lack of alternative transport means from West Wiltshire. - The system should allow exemptions for RUH visits. - Concern for the impact on the elderly and disabled. - Concern that vehicles will divert through surrounding towns and villages increasing traffic and moving the air quality issues.
Trowbridge Town Council	Q & L	<ul style="list-style-type: none"> - Would like all sections of A4/A36 and the junction of Brougham Hayes and Lower Bristol Road excluded from proposed boundary. - Would like boundary to include: <ul style="list-style-type: none"> - Area between Lower Bristol Road and Windsor Bridge road - Area to north and east of B3111 including Upper Oldfield Park - Area between river and Pulteney Road/Bathwick street - Area east of Winifred's Lane.
Valley Parishes Alliance	L	<ul style="list-style-type: none"> - Support Class C CAZ. - Concerned about impact the on Bathampton Toll Bridge.
Westbury Town Council	Q & L	<ul style="list-style-type: none"> - Broadly support air quality improvements and a charging CAZ. - Would like Cleveland Place removed from the zone. - Concerned about access to the RUH from Westbury. - Money raised from Scheme should not only be invested in Bath but for Schemes to help nearby towns and villages. - Does modelling take confused drivers diverting into account? - Concerned about disproportionate impacts to lower income groups and night workers. - Cars should be able to drive on any routes after public transport ceases operation for the day - Support Trowbridge Town Council's comments and are also concerned about impacts on Southwick, North Bradley, Bradford on Avon and Dilton Marsh.
Westfield Parish Council	L	<ul style="list-style-type: none"> - Feels the CAZ will disadvantage the less well-off and those working unsociable hours when public transport is not available. - Concern about: <ul style="list-style-type: none"> - Shift workers at the RUH (from the Somer Valley)

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Companies in Westfield and the Somer Valley - People unable to afford a new vehicle - People attending/visiting the RUH. - If the Scheme is implemented, money raised should be used to improve rural public transport and the Park and Ride capacity.
Winsley Parish Council	L	<ul style="list-style-type: none"> - Supports measures to improve air quality. However, there is concern that higher polluting vehicles will divert around Bath to avoid the charges, which could increase traffic on the B3108. This may cause road safety and pollution issues here.
Winsley and Westwood Electoral Division	Q	<ul style="list-style-type: none"> - Concern about increased traffic through Wiltshire due to the inclusion of Cleveland Place. Would like to see Cleveland Place excluded from the zone. - Exclude A36 Lower Bristol Road from the zone due to the access routes from Wiltshire to RUH. - Concern that the problem will be shifted to the outskirts of Bath. - Concessions needed for those accessing the RUH and public buses from rural areas. - Concern for impacts on the elderly and vulnerable groups - Urge consideration of other methods that could achieve the required target including cleaner buses i.e. improved Park and Ride and improved cycling and walking infrastructure.

15.5 Comments from residents' groups

Table 15-4 summarises the comments submitted by residents' groups and residents' associations. Responses received from individuals on behalf of informal groups of friends or neighbours are not included below but have been incorporated in the comments summarised in previous Chapters.

Table 15-4: Comments from residents' groups

Group	Via	Issues raised
Bathwick Estate Residents Association	Q & L	<ul style="list-style-type: none"> - Would like to see the CAZ extended to include Bathwick Estate and Beckford Road; some members would like to see this area included whilst others would like it to remain outside of the zone. - Concern about increases in non-compliant vehicles driving into the estate with particular concern for Bathwick St. Mary School students.
Bathwick Hill Residents Association	Q & L	<ul style="list-style-type: none"> - Endorse a Class D CAZ, but with some comments/concerns. - Concern that Laura Place will become a drop-off point. - Concern about HGV traffic on Bathwick Hill and North Road. - Would like to see CAZ extended to include Bathwick Hill Roundabout and part of the A36. - Support a scrappage scheme/financial help. - Supports an exemption for low income shift workers and improving public transport outside normal operating hours. - Concession for residents; a reduced annual fee for regular travel. - Pleased the zone will lead to University buses on Bathwick Hill being compliant. - Support FoBRA's proposal for a comprehensive Bath Travel Plan.
Bear Flat Association	Q	<ul style="list-style-type: none"> - Welcome CAZ introduction. - Request an RPZ being introduced in Bear Flat. - Request to extend and clarify the CAZ boundary around the Wells Road and up to the junction with Greenway Lane/Englishcombe Lane. - Propose additional alternatives: <ul style="list-style-type: none"> - Free school buses from Park and Rides. - Anti-Idling policy introduced. - Ban on buses in city centre unless zero-emission. - Reduce prices on public transport and improve services. - Reduce available parking in city centre.
Beech Avenue Residents Association	L	<ul style="list-style-type: none"> - In favour of a CAZ C. Concerned that B&NES rejection of CAZ C was based on financial not technical considerations. Request for CAZ C revenue data to be supplied if this assertion is denied. - Concerns with consultation timescales. - Suspect that a CAZ C is unaffordable and that modelling of alternative compromise options should be completed.
Camden Residents Association	Q & L	<ul style="list-style-type: none"> - Accept the need for some form of charging zone from 2020 and notes the positive impact on young children and asthma sufferers. - Concerned about the impact on Belgrave Crescent and this being used as a possible escape route. Wish to see good advance signage. - Expand RPZs to avoid commuters parking outside the zone and walking in. - Feel east of Bath Park and Ride is needed ahead of the CAZ and support general enhancements of the Park and Ride services.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Improve bus services from Camden to the RUH and school bus pick up points. - In favour of concessions for groups rather than exemptions. - Suggested supporting measures including a swappage scheme, cycling improvements and improved public transport and options for commuters.
Cavendish Road Society and Residents (TCRS) Association	Q & L	<ul style="list-style-type: none"> - Note that FoBRA does not represent the TCRS views. - Pleased that Cavendish Road, Park Place and Park Street are in the proposed zone. - Agree with FoBRA's position regarding Park and Ride. - Requests further investigation to ensure a Class D CAZ is necessary to reach the required targets. - Request financial assistance for people to switch to compliant vehicles. - Do not support FoBRA's position regarding traffic management. - Feels a traffic management approach would shift congestion elsewhere.
Clean Air for Bathwick	L	<ul style="list-style-type: none"> - Petition with 45 signatures requesting for the wider Bathwick area to be included within the CAZ. - Main concerns are similar to those detailed in Bathwick Estate Residents Association, Bathwick Hill Residents Association and Sydney Place Residents Association responses included within this table and throughout this report.
Circus Area Residents Association (CARA)	Q & L	<ul style="list-style-type: none"> - Support a small class D CAZ - there should also be a broader traffic management plan and the boundary of the CAZ may need to be reconsidered e.g. to Bathwick - Support charging drivers of all high emission vehicles - need strict enforcement. - Traffic management is a priority for CARA. - Broadly supportive of proposed boundary but concerned about the impact on areas such as Bathwick. - Support proposed charging levels. - Feel a congestion charge, like in London, may be an appropriate solution as every vehicle contributes to air pollution. - Recommend random testing of vehicles to establish true adherence to emissions standards. - Would like to see emphasis on reducing PM10 and PM2.5 particulates. - Support improvements to public transport and Park and Ride and non-charging measures that incentivize behaviour change. - Would like to see reinvestment of CAZ revenue in non-polluting alternatives, such as electric vehicles. - Support fewer exemptions and concessions but wish to see a concession for residents who have less choice/less ability to avoid the CAZ.

Group	Via	Issues raised
Federation of Bath Residents' Associations (FoBRA)	L	<ul style="list-style-type: none"> - B&NES must prioritise health of Bath residents. - CAZ should be cautionary and aim for NO₂ levels well below the legal limit. - A Class D CAZ by itself will not do the job and would need to be combined with traffic management or parking control. - A Class D CAZ plus traffic management would offer the best chance of compliance but notes that a Class D CAZ would have a serious impact on residents, especially the less well-off and those living within the CAZ and encourage unwelcome behaviours. - Notes that the modelling shows little difference in the impact on air pollution of a Class C and Class D CAZ. The 2 locations would be marginally in exceedance with a Class C CAZ. This could be dealt with by traffic management. B&NES should consider a Class C CAZ combined with traffic management as an alternative to a D CAZ. - CAZ boundary should be extended to include Great Pulteney Street, Sydney Place and Sydney Gardens, the Bathwick roundabout and the bottom of North Road and more of the A367 Wells Road to include the B3111 Oldfield Road. - Welcome proposed supporting measures, in particular longer park and ride opening hours and secure overnight parking. Disappointed not to see east of Bath Park and Ride included as a measure. - If a Class D is progressed, wish to see a scrappage scheme and lower charges for residents, at least for an initial period. - Parking control may be needed to address issues on the boundary of the CAZ. - CAZ raises wider transport issues and need for a comprehensive Bath Transport Plan. - Should prioritise lowering air pollution where children walk to school. - Express wider views on the issue of through traffic in Bath including support for work on an A36-A46 link, role of the A420 and issues in the City Centre. Notes that Queen Square and The Circus are currently carrying levels of through traffic which are inappropriate, particularly given its status within the WHS. - Overall, wish to see CAZ used as an opportunity to tackle congestion as well as air pollution.
Foxhill Residents Association	Q	<ul style="list-style-type: none"> - Remove Rossiter Road and Widcombe area from the CAZ. - Supports financial aid for those who cannot afford to upgrade vehicles. - Concern for those outside B&NES who have to pass through the zone (to Hospital etc). - Concern for impact on parents, carers and disabled. - Requests cheaper and improved public transport, to reduce number of vehicles on the road. - Suggests escorted cycle groups to school. - Supports clean air in general but concerned the issue may be moved to residential areas.
Friends of Sydney Gardens	Q	<ul style="list-style-type: none"> - Extend the CAZ boundary to include Sydney Gardens and surrounding streets. - Concern for increased air pollution, traffic congestion and parking issues in the area.

Group	Via	Issues raised
Harbutts Residents Association	L	<ul style="list-style-type: none"> - Represents households with elderly people. - Concerned about impact on Bathampton and the toll bridge.
Lansdown Crescent Association (LCA)	L	<ul style="list-style-type: none"> - Supports improving air quality within Bath with a Class D CAZ and glad that the zone has been extended to St Stephen's Church. - Feel there is no reason to allow taxis an additional 2 years to upgrade their vehicle. - Would like support for the sale of non-compliant cars for people that are genuinely in need of help. - Does not agree with some of FoBRA's traffic management ideas. - Supportive of extending the boundary in certain areas. - Must avoid creating a cul-de-sac in the Lansdown Crescent area. - Camera sensor at the top of Cavendish Road should be moved to Sion Road to avoid cars doing dangerous manoeuvres.
Lower Oldfield Park Residents Association	L	<ul style="list-style-type: none"> - Notes that the CAZ boundary has been extended along A367 Wells Road but stops short of the B3111 Oldfield Road. Concerned that a Class D CAZ will create rat runs and therefore feel that the zone must be extended to include B3111 and Bloomfield Avenue off Wellsway A367. - Notes that when the Brougham Hayes junction with the Lower Bristol Road was closed there was rerouting resulting in hold ups at Bellotts Road. Feels that rat runs should be included in the CAZ area. - Would like to see access to Sainsbury's, Homebase and petrol stations excluded from the zone. - Feel that emissions criteria could be met by a Class C CAZ and support a Class C CAZ.
Pulteney Estates Residents Association	Q & L	<ul style="list-style-type: none"> - Concern that the Henrietta Street area is not included in the zone. This area is already a rat-run and there are problems with parking. - Support a Class D CAZ if the boundary is expanded to include the Pulteney Estate area from Laura Place to the top of Sydney Gardens including the entire area between these roads and the river; and suggest the entire Bathwick area is included. - Request a Park and Ride to the east of the City and an A36/A46 bypass. - Would like a concession for residents to give them more time to change their vehicles. - Feels that the current boundary disproportionately disadvantages the residents in the PERA. Concerned about additional traffic and the area becoming an unofficial drop off zone. - PERA has liaised with many other residents' associations in the area, it is generally felt that they agree with and support PERA's request for an eastern boundary extension.
Sydney Buildings Householders Association	Q	<ul style="list-style-type: none"> - Concern that the zone leaves a rat run possibility through The Tynning, Abbey View, Horseshoe Walk and Sydney Buildings. - Request for this area to be included or for the A36 to be excluded to avoid this incentive for rat-running.
Sydney Place Residents Association	Q	<ul style="list-style-type: none"> - Request to extend the zone to include more of Bathwick, specifically the A36 between Bathwick Street and North Parade Road including Sydney Place, New Sydney Place, Sydney Mews, Sydney Gardens and Sydney Road.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Concerned that this area has not been sufficiently considered or monitored. - Feel that the CAZ, as proposed, would lead to increased pollution, rat running, congestion and road safety issues in these areas. This area has many school children and elderly residents. - Would like to see the heritage buildings in this area better protected.
The Abbey Residents' Association	L	<ul style="list-style-type: none"> - Supportive of improving air quality and believe that the Scheme should be implemented with urgency. - If there is the case to increase the zone (potentially to Pulteney Street) and this will not delay the implementation, then this should be supported. - Concern whether the charges are high enough to prompt change. - Support extended operating hours of the Park and Rides, overnight secure parking at the Park and Ride sites, financial support for residents and local businesses within the zone to upgrade from non-compliant cars and financial support for local businesses within the zone to upgrade commercial vehicles as short-term measures to mitigate impacts. - Support the longer-term measures including; public transport improvements on key routes into the city and within the zone, smaller Park and Ride sites along existing bus routes, support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles, an eastern Park and Ride and an A36/A46 link.
Transition Larkhall	Q	<ul style="list-style-type: none"> - Extend the CAZ boundary down the London Road to Gloucester Road Junction. - Concern that non-compliant vehicles will divert through Larkhall, Claremont, and Charlcombe. - Concern that alternative transport modes (active, public) are inadequate. - Concern for impact on the disabled (and their relatives) and parents on the school run. - Request additional buses from the east of the City to the south. - Believe a Class C CAZ would be sufficient, with additional measures provided at areas still 'over the limit'.
Upper Oldfield Park Residents Association	L	<ul style="list-style-type: none"> - Pleased that concern on rat runs have been addressed by the extension of the CAZ boundary up Wells Road to Oldfield Road. - Consider that the intersection between B3111 Brougham Hayes which joins the A36 Lower Bristol Road should remain <u>inside</u> the CAZ. - Intersection between Wells Road and Oldfield Road should remain as the initial boundary for traffic travelling along Wells Road. - Wish to express support for the programme overall and the air quality benefits that it should bring.
Widcombe Association	L	<ul style="list-style-type: none"> - Support Class D CAZ with further justification needed for proposed charge levels. Support the inclusions in the Widcombe area to cover Widcombe School. - Concerned about the risk of potential rat runs. - Some concern among local businesses, would like to see strong package of supporting measures to mitigate this. - Concerned that CAZ signage will be excessive – existing signage levels are already a concern.

15.6 Comments from environment/civic groups

Table 15-5 summarises the comments submitted by environment/civic groups.

Table 15-5: Comments from environment groups

Group	Via	Issues raised
Bath Preservation Trust	L	<ul style="list-style-type: none"> - Support the Scheme on the proviso that the CAZ is one of a number of initiatives to tackle congestion including behaviour change through viable alternative forms of transport including improved Park and Ride services. - Would like the boundary extended to include Great Pulteney Street and the Bathwick area.
Client Earth	Q & L	<ul style="list-style-type: none"> - Support the implementation of a Class D CAZ. - Wish to see the boundary of the CAZ extended to ensure the likelihood of compliance. - Agree with the proposed charging level and feel that this could potentially be increased. - Support the packages of measures being put in place to help people and businesses switch to cleaner forms of transport. - Would like to see the number of exemptions and concessions limited so as not to undermine the effectiveness of the CAZ. - Would support a targeted diesel scrappage scheme. - Support investment in public transport, walking and cycling infrastructure and delivery consolidation centres. - Suggest introduction of a national 'clean car' labelling system.

15.7 Comments from transport groups

Table 15-6 summarises the comments submitted by transport related groups.

Table 15-6: Comments from transport groups

Group	Via	Issues raised
Bath Bus Users	L	<ul style="list-style-type: none"> - Feel that the WECA Mayor should introduce a bus quality partnership. - There should be a focus on improving walking and cycling infrastructure. - The Scheme should focus on access for all – not just car drivers.
Bath Tours	Q	<ul style="list-style-type: none"> - Concern that those vehicles wanting to travel west from the A36 and avoid the zone will be forced up Brassknocker Hill and along North Road and Bradford Road increasing traffic in the area. - Requests a 'link road' and Park and Ride to the east of Bath. - Concern the tour coaches will be discouraged from entering Bath, affecting the business.
British Historic Vehicle Clubs	Q	<ul style="list-style-type: none"> - Concern that buses which cannot be taxed as historic vehicles despite their age will be charged for entering the CAZ. - Foreign vehicles also classed as historic should be exempt. - Support exemption for historic vehicles.

Group	Via	Issues raised
British Vehicle Rental and Leasing Association (BVRLA)	Q	<ul style="list-style-type: none"> - Concern about inclusion of the A36 – due to the impact on freight movement. - Concern about the effects on small businesses due to the high charges for Euro 5+ HGVs. - Believe the CAZ should be as small as possible to minimise disruption. - Suggests exemptions/reductions for off peak deliveries. - Suggest phased charging by Euro standard of vehicle to incentivise those with the most polluting vehicles to upgrade to something less polluting if there are insufficient compliant vehicles on the market or they cannot afford one. - Suggest a sunset period for small and medium sized businesses to allow them time to purchase compliant vehicles. - Suggest a 'mobility credit' scheme where drivers giving up high emissions vehicles would receive 'credits' to use on public transport, car clubs and rental journeys. - Suggest a scheme for SMEs, who rely on commercial vehicles, allowing them to access those being de-fleeted by larger companies. - Encourages the use of Business Car Clubs for a company's grey fleet due to high levels of vehicle compliance, thinks that B&NES needs to actively get involved and promote such Schemes to increase uptake. - Generally supportive of the standards relating to cars, however have concerns about the commercial vehicle sector and its potential impact on businesses. - Note that the CAZ is not revenue raising and expect to see all fees raised from the charges to fund further air quality improvement measures in the city. - Suggest that signage, charges and system operations should all be common between CAZ cities to reduce confusion. - Suggest a central portal where a company can make multiple payments for multiple vehicles, in several CAZs for any given day. - Want a guarantee that the goal-posts will not be shifted to give the fleet sector confidence in upgrading their fleets. - Warn B&NES not to assume that vehicle retrofitting for the commercial fleet is readily available to businesses. - Urge the Council to improve its electric vehicle infrastructure to increase confidence in the sector and want to see plans for installing points over the next 3-5 years. - Ask B&NES to ensure all businesses are aware of the proposed CAZ being implemented as research shows many are still not aware of the proposed CAZ or its vehicle standards.
Freight Transport Association (FTA)	Q	<ul style="list-style-type: none"> - Concerned about the impact of charges on local operators who would struggle to find capital to upgrade fleets and pay daily charges. - FTA requests that Bath looks to Birmingham's recent decision to seek a concession from charging (up to 2-3 years) for operators who purchased/leased Euro V/5 vehicles 'in good faith', before the proposals for the CAZ were known. - Note that there is no retrofit option for HGVs.
Motorcycle Action Group	L	<ul style="list-style-type: none"> - Support motorcycle and moped exemption. Would support a shift from single occupancy cars to powered two wheelers. - Believe more work is required on a Class C CAZ.

Group	Via	Issues raised
RAC Motoring Services	Q	<ul style="list-style-type: none"> - Response represents view of Members. - The RAC supports the principle of a Clean Air Zone but urges this to primarily target those areas where there is a breach of targets/where there is evidence these will be breached in future. - Urges that consideration is given to those vehicles which are the most polluting in terms of emissions category; noting that relatively modern vehicles covering high mileages in the zone may contribute more to poor air quality than older vehicles doing very low mileages. - The RAC does not support proposals to charge private cars unless there is evidence that no other option within the Clean Air Zone class index will bring pollution levels back down to the legal levels. - Accept that some charges for certain vehicles may be required but encourage Bath to look at other measures which may reduce the need for charging cars. Including: anti idling zones, measures to smooth traffic flow, replacement of traffic calming measures, retrofitting/replacing bus fleets, improvements to Park and Ride, varying rates for taxis, use of electronic road signs to discourage driving when air quality is bad, encouragement of car clubs and subsidised bus travel. - Supports a permanent exemption for blue badge holders. - Welcomes concession for recovery vehicles, noting that some recovery trucks have a long-life span and are very high cost. - Acknowledge health benefits but raise concerns over the impacts to lower income families who are more likely to own a non-compliant vehicle.
Road Haulage Association	L	<ul style="list-style-type: none"> - Believe the A36 must be kept clear as it is a primary route for freight traffic and there are no reasonable alternatives available. - Does not think that the charges will be effective. - Supports concessions for breakdown trucks, special vehicles tax class and special types tax class. They also point out the general haulage tax class is an unused class and will not provide a concession for HGVs. - Concerned that small hauliers will not be able to upgrade their fleets and the charges are unjustifiably high which may lead to them going out of business, therefore they propose phased charging: with discounts for Euro V vehicles until 2024. - Support financial support for local businesses to upgrade from non-compliant pre-Euro 6 commercial vehicles. - Believes there is a shortage in Euro 6 HGVs and retrofit options and there are limited redeployment opportunities for uncompliant vehicles. - Believe that the impact on the haulage sector has been vastly underestimated in several key areas and a number of errors have been made in the assessments. - Do not think that a fleet of compliant HGVs will be possible in the time frame set in the studies. - Believe no credible number (i.e. monetary amount) has been given for the cost to businesses. No assessment has been done of the HGV market fluctuations and no consideration for the passing on of CAZ charges has been given, therefore the data is flawed.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Would like Bath to look into a possible link road from the A4174 to A37, which would provide a viable diversion route around Bath.
Society of Motor Manufacturers and Traders (SMMT)	L	<ul style="list-style-type: none"> - Recognise the importance of improving air quality. - Would support a more holistic approach to sustainable urban mobility including better communication with other authorities locally and internationally.
South West Transport Network & Bus Users UK	Q	<ul style="list-style-type: none"> - Suggests that a CAZ should include the A36 Lower Bristol Road, A36 Warminster Road and A4 London Road. - Would like to see an exemption for taxi's, coaches and buses and help to convert from pre-Euro 6 vehicles. - Notes importance of allowing an exemption for rail replacement buses. - Supports introduction of light rail/tram lines between Bristol and Bath. - Concerns of the impact on children, asthmatics and the elderly. - Move freight from road to rail (include new freight terminal in Bath).
UKLPG	L	<ul style="list-style-type: none"> - Suggest an interest free loan for taxi drivers to convert to LPG instead of a concession, and encouragement of LPG use by van fleets.

15.8 Comments business and tourism groups

Table 15-7 summarises the comments submitted by larger businesses, umbrella groups and tourism groups. A range of submissions were also made by smaller businesses. These are not recorded below to protect confidentiality, but the issues raised are incorporated in the Chapters above.

Table 15-7: Comments from business and tourism groups

Group	Via	Issues raised
Bath BID	Q & L	<ul style="list-style-type: none"> - Support need to improve air quality. - Concerned about the economic impact analysis work undertaken and would like further economic modelling. - Would like a clearer split of behaviour change modelling – separate ‘cancel’ and ‘change mode’ as options. - Improve Park and Rides and public transport across the area. - Extend time scales to enable a more natural turnover of the vehicle fleet.
Bath Centre National Trust	L	<ul style="list-style-type: none"> - Concerned about coaches that currently use the Riverside car park for pick and drop off during day trips for Bath residents including Bath Centre National Trust members.
Bath Chamber of Commerce and the Initiative in B&NES	Q	<ul style="list-style-type: none"> - Understand the mandate to improve air quality but are concerned about the inclusion of cars especially as members are increasingly concerned about the difficulty of doing business in Bath. - Concerned at the cost of public transport will increase and that the cost of deliveries will also increase.
GLL (Bath Sports and Leisure Centre)	L	<ul style="list-style-type: none"> - Concern that the consultation feedback form does not allow individuals to capture all the issues concerning the leisure centre operation. - Concern that the Bath Sport and Leisure Centre is in the zone. They think it is unlikely that customers will pay the charges, plus membership and parking fees to attend activities and this will have a negative health impact on much of the population. - Concerns for staff who are low-income and do shift work; they may not be able to afford compliant vehicles and public transport/Park and Rides don't cater for shift timings. - Concern that the CAZ charges would make recruitment more difficult and would impact on those working for GLL who may choose alternative employment due to the economic effect on overall income because of the charges. - The CAZ was not in place when GLL took over management of the leisure centre and any impact to business operation would be subject to review as CAZ implementation could negatively impact GLL running a viable business. - Understand the need for a CAZ but GLL do not support the current zone position.
Royal Mail	Q	<ul style="list-style-type: none"> - Are in process of purchasing some newer vehicles but replacement of whole fleet will take time – would like a concession to aid this
Somerset Tourism Association	L	<ul style="list-style-type: none"> - Welcoming of the attempt to improve the environment. - Feels that the Scheme will have a negative impact to tourism in Bath due to many coaches being non-compliant and passing on charges to customers, including school groups and private hires.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Suggests implementing alternative bus stops outside the zone within walking distance of the city centre enabling coaches not to incur the charges. - Feedback received suggests altering the boundary to allow coaches to drop off/pick up near the University and Bathwick area.
UPS	L	<ul style="list-style-type: none"> - Support CAZ but would like boundary to be as small as possible and implementation to be as late as possible. - Urge the Council to look at innovative ways to encourage the introduction of electric vehicles into fleets the area as well as other delivery methods such as e-bikes and staging areas that can help to reduce both emissions and congestion - Take their environmental footprint seriously. - Would like the Council to ensure range extended, electric vehicles are considered compliant and not liable to a charge. If a CAZ is introduced consider making space available for city centre container staging, e-tricycle parking and charging infrastructure to support sustainable final mile deliveries and fund and support companies looking to electrify their fleet and invest in grid capacity and/or develop and deploy Smart grid technology which will allow the charging of vehicles overnight in a cost-effective way.
Toyota	L	<ul style="list-style-type: none"> - Support the transition towards low and ultra-low emission vehicles - Would like pre-euro 4 petrol hybrids to be exempt - Take their environmental impact seriously

15.9 Comments from healthcare/emergency services

Table 15-8 summarises the comments submitted by umbrella groups representing healthcare and the emergency services.

Table 15-8: Comments from groups representing healthcare/emergency services

Group	Via	Issues raised
South West Ambulance Service Trust	Q	<ul style="list-style-type: none"> - Concern about ambulance workers travelling to the station through the zone as there is a lack of public transport suitable for shift work. - Supports and alternative of no commercial transport in 'day time hours'. - Supports and exemption for Health Care Professionals. - Concern about financial impact on the Ambulance Service.
Avon and Wiltshire Partnership (AWP) NHS Trust	Q	<ul style="list-style-type: none"> - Concerned that the inclusion of Brougham Hayes junction will penalise Health and Social Care staff coming in from Wiltshire and working in AWP Mental Health NHS Trust services at the Royal United Hospital site. - Concerned about staff recruitment and retention. Do not think health and social care staff should be charged. - Concerned that service users will not attend appointments.
Better Care	L	<ul style="list-style-type: none"> - Home care providers are concerned about being charged to travel in the proposed CAZ. - Suggest care workers and NHS staff should be considered for an exemption as the charges will likely be passed back to the Council in the form of higher fees for care.
Bluebird Care Bath	Q	<ul style="list-style-type: none"> - Wish to see permits given to health care assistants.
Royal United Hospital	L	<ul style="list-style-type: none"> - The RUH submitted comments marked confidential.
University Medical Centre	Q	<ul style="list-style-type: none"> - Disagree that the charge will be effective - Concern for the impact on people commuting from surrounding areas with no public transport. - As NHS providers their business relies on using cars in and around Bath and the proposed zone. - Support concessions for emergency service vehicles and blue badge holders. - Don't believe any measures help their staff, highlight the fact that the surgery is at the top of a steep hill so cycling and walking would be inappropriate for long distance staff, and many also lack a direct bus service. - Concern that wages for staff would not be sufficient to cover costs of the charges and they would be unable to afford to upgrade their vehicle. - Agree that something does need to be done, but do not agree this is a good solution.

15.10 Comments from groups representing sectors of the community

Table 15-9 summarises the comments submitted by groups representing sectors of the community.

Table 15-9: Comments from groups representing sectors of the community

Group	Via	Issues raised
Age UK & Contact The Elderly	Q	<ul style="list-style-type: none"> - Concerned about the impact onto volunteers and staff. Age UK would have to cover the costs for these vehicles and this would impact on expenditure and result in a reduction in services. - Concerned about the impact of the zone on older people who rely on services which may become more expensive. - Concerned that Age UK service provision for Age UK to older people will reduce as a result of the charges impacting staff owned vehicles or non-compliant minibuses. - Would like to see hospitals not included in the zone. - Create an un-charged route through the zone around Bath to avoid traffic being pushed into local towns. - Build Park and Ride to the east of Bath and extended operating hours to allow overnight parking. - Supports a concession to help mini-busses be upgraded. - Concerned about effect on hospital day trips, charity mini busses, coach trips, and access to M4.
Tax Payers Alliance	L	<ul style="list-style-type: none"> - Notes that there is pollution also from aeroplanes etc as well as motorists. - Consider that financial penalties will have negative consequences i.e. - costs will be passed on to passengers and employees - Effectiveness of CAZ is unclear, and CAZs are not necessarily the answer - An alternative solution would be to tackle congestion — Government should spend money on improving roads.

15.11 Comments from religious groups

Table 15-10 summarises the comments submitted by groups representing religious organisations.

Table 15-10: Comments from religious groups

Group	Via	Issues raised
Bath Abbey	L	<ul style="list-style-type: none"> - Concerned for the impact on membership, suggest a concession for members or Sunday passes for those who need them.
Bath Central United Reformed Church	Q	<ul style="list-style-type: none"> - Concerned about the impact to the church and community centre. - Not supportive of proposals.
Bath Christian Action Network	L	<ul style="list-style-type: none"> - Offer to support the Council in setting principles of the Scheme, communications and identifying which groups will need extra support.
Bath City Church	Q	<ul style="list-style-type: none"> - Concerned about the impact on people wishing to attend church and engage with the community - Wish to see improved bus and Park and Ride services across the city including earlier Sunday morning bus services; and a publicity campaign. - There should be a blanket concession for over 70s as some of the most vulnerable members of society. - 24 hour charging should begin during the night when traffic is lowest, so no late night activities are obstructed for volunteers.
Bathel Baptist Church	Q	<ul style="list-style-type: none"> - Would like the London Road and Cleveland Pace junction excluded from the proposed CAZ. - Disagree that the charges will be effective. - Concern that most of their congregation come by car and feel they will be discouraged if they have to pay the CAZ charges. - Suggest no CAZ charges at evenings and during weekends, as with the London congestion zone. - Notes that their only regular employee already cycles. - Concern about getting volunteers to run children's meetings and parents driving their children to these meetings. - Concern that they will lose income from renting their parking spaces to commuters, as they may not use them due to the CAZ. - Support the principle of a CAZ but feel the current 24 hour scheme with a £9 charge for cars is draconian. - Don't believe the zone will be effective at reducing traffic. - Concerned about the impact on the elderly who may not be able to afford a new vehicle and may become isolated.
St. Barnabas Church	Q	<ul style="list-style-type: none"> - Wish to see financial assistance for low income households, improvements to public transport (cost and frequency of service), increased electric vehicle charging points and financial assistance to purchase electric vehicles. - Concern that the problem will be shifted to areas outside the zone, particularly Southdown. - Request a comprehensive review of public transport and learning from European Countries.
St John's Church	L	<ul style="list-style-type: none"> - Support a CAZ as a way to improve health. - Concerned about the impact on those unable to afford to change their vehicle or pay the charges.
St. Mary's Church	Q	<ul style="list-style-type: none"> - Understand the need for a clean air zone.

		<ul style="list-style-type: none">- Concerned that the boundary isolates two main catholic churches in Bath.- Would like a smaller zone.
The Salvation Army, Bath Citadel	Q	<ul style="list-style-type: none">- Concern that the proposed CAZ would negatively impact those attending services – many of those the church supports are elderly, vulnerable or disadvantaged.
Widcombe Baptist Church	Q	<ul style="list-style-type: none">- South eastern boundary should follow the river- Not supportive of Scheme due to impacts to congregation.

15.12 Comments from education providers

Table 15-11 summarises the comments submitted by education providers.

Table 15-11: Comments from education providers

Group	Via	Issues raised
Atelier Nursery	Q	<ul style="list-style-type: none"> - Agree that something should be done about air pollution but concerned about the timescales of the proposed Scheme and about recruitment and retainment of staff and the impact to parents.
Bath College	Q	<ul style="list-style-type: none"> - Request more concessions for vehicles in educational and special needs categories above the community category. This should include mini buses travelling for College visits/academic purposes and Taxis used by 'Special Educational Needs Disabilities Students' who use this service in order to attend college. - Note that the majority of their students use public transport.
Bath Spa University	Q	<ul style="list-style-type: none"> - Support Scheme. - Think it will reduce the number of students bringing vehicles to their accommodation.
Bathampton Primary School	Q & L	<ul style="list-style-type: none"> - Support improved air quality - Believe the zone should be extended to Bathampton to protect safety of the children.
Bathampton Primary School Governors	Q	<ul style="list-style-type: none"> - Think the zone should be enlarged. - Disagree that the charges will be effective. - Supports a concession for emergency service vehicles and Euro 4/5 diesel coaches with valid educational permits. - Concerned about the additional vehicles that will divert through Bathampton and the increased air pollution this may create. - Concerned that any additional vehicles will cause more queues and an increase in idling. - Concern for the safety of walkers, especially children, and cyclists in the village due to increased traffic. - Believe the estimate of 10 additional cars per hour crossing the toll bridge is an under-estimate and would like to see how the figure has been arrived at. - Believe that not enough work has been undertaken to assess the impact of the proposed CAZ on Bathampton. - Concerned that more people will park in the village to commute into Bath. This is especially a concern in the George Car Park which is relied upon for school parking.
Bathwick St Mary's Church & School	Q & L	<ul style="list-style-type: none"> - Want their school to be included within the zone, along with the A36. - Concerned that polluting vehicles will be encouraged past the School and its playground which would cause safety concerns and potentially increase pollution for children.
Hayesfield Girls' School	Q	<ul style="list-style-type: none"> - Would like Brougham Hayes junction removed from the zone. - Concerned about the impact of the Scheme to students and staff.
King Edwards School	Q	<ul style="list-style-type: none"> - Concerned that the proposed zone will be extended and further impact student travel to and from school and for extra-curricular activities and trips.

Group	Via	Issues raised
Midsomer Norton Schools Partnership	Q	<ul style="list-style-type: none"> - Schools using registered vehicles to transport students for educational purposes should be exempt from charges.
Oldfield Park Preschool	Q	<ul style="list-style-type: none"> - Doesn't think the CAZ boundary should be changed - Thinks the impacts on external areas such as Oldfield Park should be assessed. - Concerned about the current parking availability in Oldfield Park, have suggested that marked parking bays, 1 per house, be introduced in the area around the Baptist Church and on Moorland Road. - Suggest limiting the number of cars a HMO can have and introduce parking permits for those who live and work in Oldfield Park. - Disagree that the charges will be effective. - Concerned about an increase of traffic on Moorland Road and the risk this could cause to children.
Ralph Allen School	Q	<ul style="list-style-type: none"> - Concern about student safety on the way to school - Note that there is no funding available for fleet upgrades. - Consider public transport to be insufficient. - Concerned that the proposed zone will push the most polluting vehicles onto Bradford Road and Claverton Down.
St. Nicholas	Q	<ul style="list-style-type: none"> - Concerned about the impacts on the school and staff travelling during school time hours to meetings in Bath.
Widcombe C of E Junior School Governors	Q	<ul style="list-style-type: none"> - Support the boundary, which now includes Widcombe School. - Would like to see a larger area of Widcombe and Pulteney Road included.

15.13 Comments from clubs and charities

Table 15-12 summarises the comments submitted by clubs and charities.

Table 15-12: Comments from clubs and charities

Group	Via	Issues raised
Bath Canoe Club	Q	<ul style="list-style-type: none"> - Concern about people joining the club or taking part due to its location within the zone and need cars for transporting canoes. - Request for the CAZ to run only during peak hours.
Bath and District Samaritans	Q	<ul style="list-style-type: none"> - Many volunteers do not drive compliant cars and have low incomes and the charity could not cover the cost of the charges for volunteers
Bath Spa Band	Q	<ul style="list-style-type: none"> - Concerned that the current designated HGV route through the city is within the CAZ. - Access to Charlotte Street Car Park should be outside the zone. - Concern about the impact on carers, deliveries, workers and organisations (including education, health and community). - Suggests an exemption for private cars from 6pm-7am, for vehicles attending the RUH or GP appointments, and for Euro 5 diesel vehicles. - Would like to see financial support to upgrading from Euro 3/4/5 vehicles. - An exemption for private cars and all residents and potentially reduced charge for vans/LGVs. - Thinks that current traffic issues are from poor traffic management Schemes and overabundance of traffic lights creating stop/start traffic.
Bath Soup Run & Street Pastor Volunteers	Q	<ul style="list-style-type: none"> - Concern about the cost of upgrading from de-valued pre-2015 diesel vehicles (purchased on Government advice). - Concern for volunteers paying £9 to £18 to access the zone for volunteering, this will drive many volunteers away. - Supports concessions for volunteers. - Supports CAZ being active during only peak hours to allow evening volunteers/workers to access the city at night and not affect Bath's "vibrant night life". - Supports delayed implementation.
Charlcombe Toad Patrol	Q	<ul style="list-style-type: none"> - Exclude Royal Victoria Park from the zone. - Concern that people will find alternative routes due to high cost of upgrading vehicle and lack of public transport alternatives. - Public transport should be available earlier and later in the day and services be improved. - Concern that volunteers will not be able to travel to Charlcombe Toad Patrol site. - Concerned that Charlcombe Lane will be used as a rat run and the annual toad closure ignored.
Dorothy House Hospice	Q	<ul style="list-style-type: none"> - Concern about the impact of the charges on care workers delivering palliative care in people's homes across the proposed CAZ.
Genesis Trust Bath	Q	<ul style="list-style-type: none"> - Concerned about the impact on their fleet, staff, volunteers and the knock-on effects which could limit the charity work undertaken.
Keynsham Mencap Society	Q	<ul style="list-style-type: none"> - Decrease the CAZ area.

Group	Via	Issues raised
		<ul style="list-style-type: none"> - Concerned about the access to the train station, sports centre and the M4. - Requests for improved public transport in local villages around Bath. - Concerned about respite carers who regularly need to access the proposed zone. - Supports construction of an A46/A36 bypass and improved traffic flow through Bath.
Off the Record	Q	<ul style="list-style-type: none"> - Concerned that fewer people would use their service. - Users would be anxious using public transport or walking. - Outreach workers travel to visit young people. - Charity workers delivering outreach services are on low pay and the proposed CAZ charges would be unaffordable for those with non-compliant vehicles who face additional costs for using their vehicle or extra time to travel by bus/on foot.
Other clubs and groups	Q/L	<ul style="list-style-type: none"> - A range of smaller clubs and groups also submitted feedback. In particular they raised concerns that the CAZ charges may discourage people from attending.
Scout Cubs Southdown	Q	<ul style="list-style-type: none"> - Exclude Brougham Hayes junction from the zone to stop traffic diverting through Oldfield Park and causing pollution here. - Don't think charges should apply 24/7. - Concern about access to the M4 and the RUH.
Women's Institute	Q	<ul style="list-style-type: none"> - Concern about three-point turners on Lansdown Road who are trying to avoid entering the CAZ.

16. Comments on consultation process

16.1 Overview of feedback on consultation process

A range of comments were made, across both questionnaires and within the letters and emails, about the consultation process and the consultation materials.

A variety of positive feedback was received which indicated that:

- Overall, many respondents were pleased to be given the opportunity to comment on the proposals.
- Many of those who attended the consultation events appreciated the opportunity to talk face to face with the project team about the issues.
- Some people found the information published clear and easy to understand.
- The media coverage and postcards delivered to households were effective in ensuring a wide range of people were made aware of the proposals.

Other feedback indicated that some respondents had questions, suggestions or concerns over the consultation process. The following feedback was recorded, and these comments will be used to help in the planning of future consultations and events.

Decision making process/timescales

- Scepticism that views will be taken into account and concern that decisions have already been made.
- Concern that as the need to tackle air quality is a Government directive it is not appropriate to consult, or that the views put forward during the consultation cannot be taken into account.
- Perception that the timescale for consultation, decisions and people to take action is too short.
- Concern that, through this process residents' associations are putting forward views that do not have the full support of people living in these areas.

Options presented

- Concern that a CAZ is presented as a given and that other options have not been presented for comment or assessed in sufficient detail.
- Concern that a Class D CAZ is presented as the only option capable of delivering the required air quality improvements when the difference compared to a Class C CAZ is very small.

Format of consultation materials

- Respondents commented that the maps provided were not particularly clear.
- Some people experienced difficulties with the online survey in terms of selecting priorities. Generally, respondents wanted to allocate a high priority to more options than the set up would allow.
- Some respondents found the questionnaire too long, confusing and difficult to complete.
- Key destinations need to be more clearly marked on the map, so that people can see if they are in or out of the proposed zone, for example the supermarkets and the hospital.
- Concern about the way the survey has been worded and that the questions are designed to get the answers wanted/are leading questions.
- Concern about people who do not have access to the internet.
- Concern that the questionnaires were designed in a way to encourage respondents to approve the Scheme and they did not allow for people's true views to be expressed.

- Concern that the consultation materials do not address the everyday traveller who passes through Bath and may be affected.

Level of information provided

- More information should be provided on locations/levels of pollution and the extent of change that will be naturally expected over time, i.e. as people switch to lower emission cars of their own accord.
- There should be more information on the positive benefits of the proposal and the extent to which the alternative solutions considered address the targets.
- The questionnaires/consultation materials should better explain what the money raised from the CAZ will be spent on.
- Vehicle types benefitting from concessions and exemptions should be explained more clearly.
- The reasoning behind the proposed boundary should be explained.
- More information and publicity is needed around the concessions and Schemes the Council is considering to help mitigate the impact of the CAZ, to help overcome negative sentiment.
- Insufficient information was provided to allow members of the public to properly understand and comment.
- The materials should make the cost to individuals and businesses clearer.
- More information is needed, for example on the contribution that higher emission private cars make to the air quality problem.
- Some respondents commented that they found it difficult to check whether their vehicle is compliant or not.
- Costs of supporting measures should be provided, to allow people to make informed choices.
- Information and questionnaires do not provide scope for comment on issues outside the city centre.

Scope of consultation

- Concern that members of the public were not previously aware of the proposals and had not had the opportunity to be involved in previous rounds of consultation.
- Concern that the staff at consultation events were not sufficiently knowledgeable.
- Concern that not everyone is aware of the proposals (particularly from areas outside of Bath) and that the consultation period is not long enough.
- School children should be included in the consultation.
- Concern that the questionnaires will not represent the true extent of public opinion.
- Concern that those who will be most affected will not have a voice. Concern that vulnerable groups will be the least likely to respond.
- The Council needs to work more closely with adjoining areas.
- The whole air quality campaign needs more advertising and publicity.
- More work should be undertaken/published as part of the consultation to establish/set out the impact on vulnerable groups.
- The process should include additional opportunities for consultation, rather than mainly online. The questionnaires should have been delivered to every household.
- Concern that consultation events should have been held across a wider area, to reflect the areas that may be impacted. Specific calls for an event to have been held in Weston.
- Some respondents expressed concern that proposals would be de-railed by lobbying and protest groups.

- More should be done to win over the hearts and minds of residents.
- Concern that not enough consultation has taken place with those people directly affected.

17. Next steps

The feedback received on the Class D CAZ proposal has covered a wide range of issues and concerns. Whilst some respondents have shown support for the proposed Scheme, others have objected to the principle of the CAZ and many (including those who have supported the Scheme) have called for further consideration of the details surrounding the Scheme implementation. For example, in relation to the proposed boundary, the charge, the range of concessions and exemptions offered, and supporting measures required to support the CAZ.

This report has provided a factual overview and summary of the comments received and is intended to be used by the Council to inform thinking and to guide the identification of further work required to address the issues raised in the consultation and ultimately to support a decision on the Clean Air Plan.

Based on the analysis of the consultation feedback, and in the context of the technical work already undertaken, it is recommended that further work should address the issues from the consultation as highlighted in Table 17-1. Given the volume of comments received it is not possible to address every comment. However, the recommended further work identified below aims to:

- Address the main themes and concerns highlighted during the consultation.
- Focus on the issues most critical to the delivery of a solution, in the context of the Government direction and the scope of the project.
- Focus on ideas that have not previously been considered.
- Re-state the case for issues that have been previously considered and are documented elsewhere or are outside the scope of this project.

In some cases, this additional work may involve technical analysis, for example through the use of traffic and air quality models. In others, the consideration required may be more appropriately undertaken on a qualitative basis. The results of this work will be reported separately.

Table 17-1: Recommended further work

Topic	Issue
<i>CAZ boundary</i>	<ul style="list-style-type: none"> - Examine the feasibility of the Class D CAZ covering a potentially smaller area, in particular to exclude the A4 and A36 as through routes. - Consider the feasibility of a Class D CAZ covering a larger area, to include areas requested for inclusion by residents. - Consider the feasibility of minor changes to the proposed Class D boundary to assist residents.
<i>CAZ charge and operation</i>	<ul style="list-style-type: none"> - Restate the reasons why a congestion charge is not appropriate in this context. - Revisit previous work on a Class C CAZ and, where necessary, undertake further analysis to establish if a Class C CAZ could be feasible in terms of addressing the required air quality targets. - Consider, in the case of a Class D CAZ, what can be further offered to support people to make positive changes either to their vehicle or to travel by alternative modes. For example, by providing further details on the financial support available. - Revisit/further consider, in the case of a Class D CAZ, whether it is feasible to offer any further alterations to the proposed Scheme to address concerns about the level of charge in terms of charging structures, minimum standards, concessions, discounts, and hours of operation.

Topic	Issue
<i>Concessions and exemptions</i>	<ul style="list-style-type: none"> - Consider how residents be supported, for example through concessions or the provision of financial support schemes. - Further consider the feasibility of offering a wider range of concessions or exemptions, in particular to mitigate the impact on vulnerable or low-income groups, businesses and for additional vehicle type or trip purposes, for example trips to the hospital. - Further consider the feasibility of extending the concessions already proposed.
<i>Supporting people in their response to the CAZ charge</i>	<ul style="list-style-type: none"> - Review what measures and support, in particular financial support, can be offered to help encourage more people to change to a compliant vehicle. - Similarly, establish the extent of financial support that can be offered to businesses to assist in their transition to lower emission vehicles. - Consider what can be done to reduce the risk of people reducing their visits to Bath and taking their custom to other towns. For example, by considering how to improve and promote public transport so that this is seen as an attractive alternative to accessing Bath by car. - Ensure that the full extent of possible knock-on effects from drivers taking alternative routes to avoid the CAZ is fully understood and set out how this can be monitored.
<i>Supporting measures</i>	<ul style="list-style-type: none"> - Consider the feasibility of other additional supporting measures to mitigate the impact of a Class D CAZ on residents and businesses, in particular low-income groups. Provide further details of the financial support package. - Consider the extent to which this project can help support improvements to bus services and Park and Ride, and in particular the feasibility of providing free or significantly subsidised services. - Consider the scope for additional supporting measures that are related to parking and traffic management, including for deliveries as well as additional improvements for other modes, including walking, cycling, car share and school travel. - Ensure that comments relating to other services already being provided by the Council are passed on to the relevant department.
<i>Affected groups</i>	<ul style="list-style-type: none"> - Continue to develop the Equality Impact Assessment, to ensure that groups disproportionately affected are identified and targeted. - Consider how specific groups, in particular lower income households, can be supported should a Class D CAZ be taken forward, for example through concessions, discounts or exemptions. - Consider how impacts to individual journeys can be mitigated, for example through consideration of the CAZ boundary or through particular concessions or exemptions. - Consider how impacts on businesses can be mitigated, and how businesses can be best supported.
<i>Alternative approaches to tackling air quality</i>	<ul style="list-style-type: none"> - Review previous statements on, and further examine as appropriate, the, feasibility of a Class C CAZ, for example if combined with other measures, or with traffic management. - Restate the reasons why a wider congestion charge is not currently being pursued. - Restate the reasons why the required air quality improvements cannot be met through focus on non-charging measures alone. - Explain why wider infrastructure improvements, including A36-A36 link road and the east of Bath Park and Ride are outside the scope of this project, and confirm the Council's overall position on these issues.

Topic	Issue
<i>Indirect impacts</i>	<ul style="list-style-type: none">- Establish how the wider impacts of the CAZ will be monitored.- Ensure that additional modelling takes account of the comments raised, where appropriate.- Take forward the detailed issues raised concerning Scheme implementation and operation for further consideration at FBC stage.

Appendix A. Copies of Consultation Materials

Public consultation

A Charging Clean Air Zone for Bath



Bath & North East
Somerset Council



BreATHe 
A Clean Air Zone for Bath

Have your say on Bath's Clean Air Zone

A high level of pollution in Bath, caused by vehicle emissions, is harming the health of people living and working in the city.

The Government has now asked us (along with 27 other local authorities) to reduce levels of nitrogen dioxide (NO₂) in the air by 2021 at the latest, and is providing all of the funds to do this.

Our preferred option to achieve these improvements is a **Class D Clean Air Zone (CAZ)**. This would mean charging drivers of all higher emission vehicles – including cars – to drive in the city centre from late 2020. Lower emission vehicles would not pay the charge.

We also looked at other options, including not charging higher emission cars, but extensive analysis has shown that none of these options would enable us to meet the required reduction of NO₂ in the time allowed.

Our proposal for a Class D CAZ is now being reviewed by the Government, and the Council must reach a final decision in December 2018. Your views will be taken into account.

Causes of air pollution

There are a number of places in Bath where NO₂ exceeds the EU and national legal limit of 40 ug/m³, mainly caused by diesel and older petrol vehicles. Our monitoring shows that, on average, buses and coaches contribute 32 per cent of NO₂ measured in Bath, HGVs: 19 per cent, and diesel cars and vans: 41 per cent. Petrol cars contribute 7 per cent.

Health impacts

A high level of NO₂ makes heart and lung conditions worse. 12,000 people in Bath and North East Somerset suffer from asthma, and exposure to NO₂ 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.

A charging zone would quickly improve the air we breathe by deterring higher emission



vehicles from driving in the city. It is supported in Bath by Asthma UK, British Heart Foundation and the British Lung Foundation.

The zone

The proposed zone (pages 4-5) is in the centre of the city, but it would also improve air quality on arterial routes such as London Road and the A36. Outlying towns and villages should also see improvements with more lower emission vehicles on the road.

Charges would not affect everyone

Some of you will already drive lower emission vehicles, cycle or take public transport, so would not be affected by the CAZ. Many will naturally change to lower emission vehicles over the next few years. In fact, our research tells us that by 2021, it would affect only 25% of vehicles.

We're also looking to lessen the impact of the zone with a range of proposed exemptions, concessions and measures to help people get around. See pages 6-7.

Timing

If our proposals are accepted, a charging zone would be in place by the end of 2020.

Have your say

We're very keen to hear your views. Please complete our questionnaire, available online and at your local library, or come to one of our regular events. Turn to the back for details.

Completed questionnaires must be received by 26 November 2018 (23:59 hrs)

How would the Clean Air Zone work?

We're proposing a Class D CAZ, which means that all higher emission buses, coaches, HGVs, private hire vehicles, taxis, LGVs/vans and cars would be charged when driving in the city centre from late 2020. See map of the zone overleaf.

We looked carefully at other options, such as not charging higher emission cars, but our analysis shows that this would not sufficiently reduce NO₂ in the time available.

Who would be charged?

Only people driving higher polluting vehicles would have to pay in the zone, and no vehicle would be banned. This is not a congestion charge.

Charging depends on whether or not an individual vehicle meets the Government's minimum emissions standards to travel freely in a Clean Air Zone. These minimum standards are: Euro 6 diesel vehicles, Euro 4+ petrol vehicles and ultra-low emission vehicles.

In light of the Government's directive, we're proposing that drivers of the following vehicles would be charged to drive in central Bath from late 2020:

- **Pre-Euro 6 diesel vehicles, including hybrids (older than approx. 2015)**
- **Pre-Euro 4 petrol vehicles, including hybrids (older than approx. 2006)**

Local and national exemptions apply.



Who would not be charged?

Drivers of the following vehicles would not be charged because they meet the Government's minimum emission standards i.e. they are compliant, lower emission vehicles:

- **Euro 6 diesel vehicles (registered from approx. 2015)**
- **Euro 4, 5 or 6 petrol vehicles (registered from approx. 2006)**
- **Fully electric and hydrogen fuel cell vehicles**

We strongly recommend that you contact your vehicle manufacturer to confirm its Euro standard. The date of manufacture, which indicates the Euro standard, is not the same as the date of registration.

National exemptions would also apply to:

- Vehicles within the disabled passenger tax class
- Vehicles within the historic vehicle tax class

And we're proposing local exemptions for:

- Motorcycles and mopeds
- Vehicles driven by disabled people
- Emergency vehicles

In addition, **local concessions** would give certain groups more time to adapt. These proposals are outlined on page 6.

About Euro standards

A Euro standard (i.e. Euro 1-6) represents the amount of pollution emitted by a vehicle's exhaust. A higher Euro number indicates that the engine is newer and its emissions cleaner. A lower Euro number means the engine is older and more polluting. Please note that diesels create more NO₂ than petrol vehicles.

This is all in accordance with the Government's Clean Air Zone Framework guidance.

Proposed charges

- **£9** for higher emission, non-compliant cars, taxis and LGVs/vans
- **£100** for higher emission, non-compliant buses, coaches and HGVs

Charges would apply once in every 24-hour period (midnight to midnight) when entering or driving in the zone. This would apply 7 days a week, 365 days a year. If your vehicle is parked in the zone and does not move, you would not pay the charge.

How we set the proposed charges

The charge levels are based on considerable analysis of data, including results of a survey completed by more than 1,000 local drivers of higher emission vehicles.

The proposed charges are not designed to raise income for the Council, but to make the required air quality and health improvements by 2021 at the latest.

They are just high enough to encourage drivers of higher emission vehicles to use alternative travel or change their vehicle, and would deter unnecessary short cuts through the city centre.

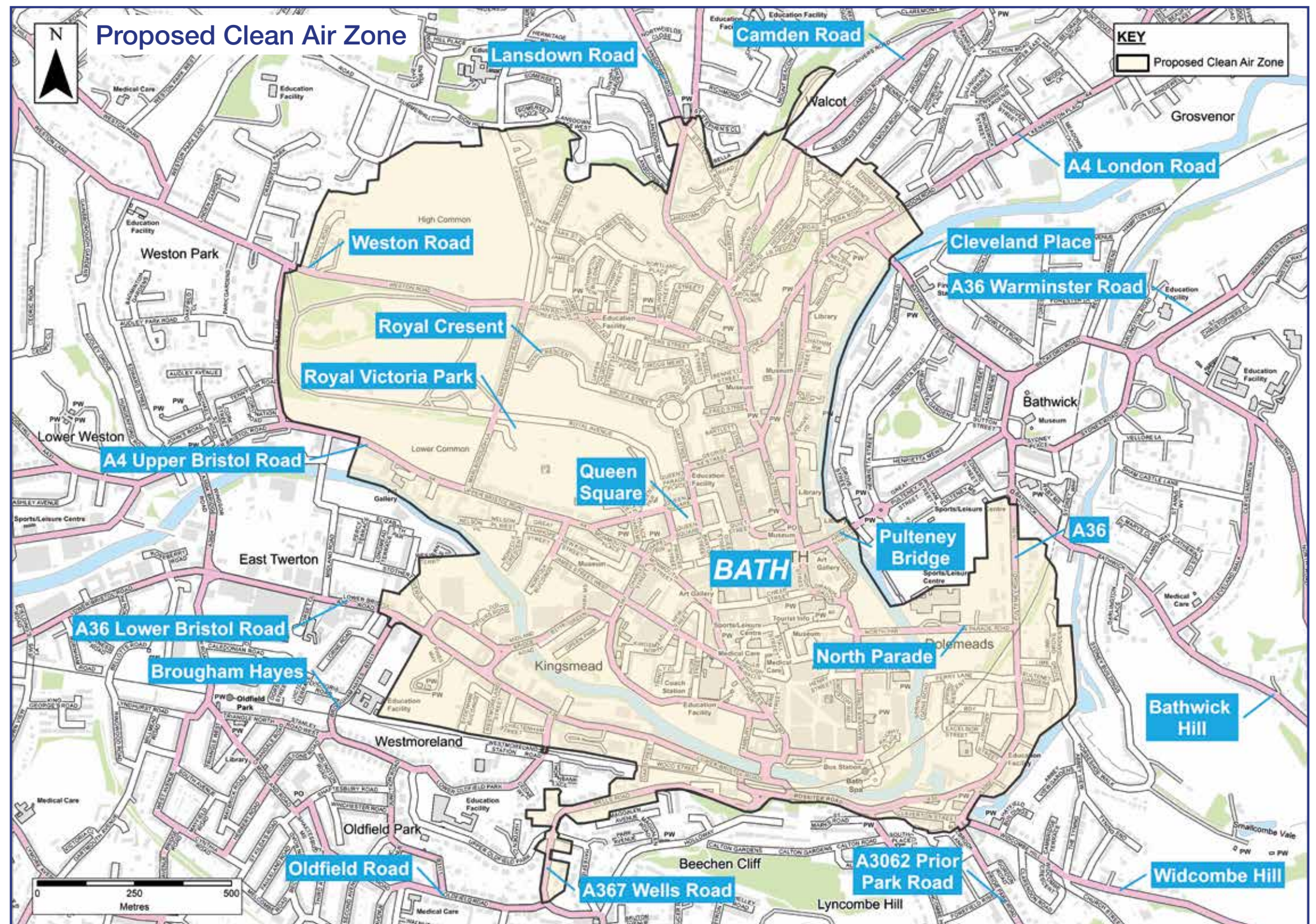
Paying the proposed charge

Cameras would be set up in and around the zone that would read every vehicle's number plate as they pass and establish compliance or non-compliance. Drivers of non-compliant vehicles would need to pay the charge by midnight of the following day at the latest. A penalty charge notice would be issued to those that fail to pay.

The zone

This map shows the area of Bath that we are proposing to include within the zone. The previous version, published in the spring, has been amended to take into account residents' views.

Our modelling now tells us that the majority of roads outside the zone would not see an increase in traffic but would see an



improvement in air quality. Some roads might see a slight increase in traffic only, but these would be closely monitored and any problems would be addressed through traffic management.

The boundary has also been carefully drawn to reduce opportunities for higher emission HGVs to take short cuts through Bath.

Why does the zone only include the city centre?

The proposed zone would deliver the required reductions in NO₂ with the least impact on residents and the local economy.

However, our assessments also show that there would be improved air quality on all arterial roads.

Support for the community

While we anticipate that 75% of vehicles would be compliant by 2021, it's important that we assist people to get around the city.

Some Government funds are available to help us do this, as well as any surplus revenue from the zone after 2021.

Concessions

We are proposing concessions for vulnerable groups driving Euro 4 and 5 diesel vehicles (registered from approx. 2006):

- Registered blue badge holders
- Registered healthcare providers
- Registered community transport providers

A concession is also proposed for:

- Euro 5 diesel hybrids (registered from approx. 2010/11)

These would only apply locally until 1 January 2022.

Support for taxis

Taxis are important to the city, so we also plan to delay charging certain types of taxis until 1 January 2022, giving drivers additional time to change their vehicles. This concession would only apply to taxis licenced by the Council. It includes:

- Accessible taxi and private hire diesel vehicles registered from approx. 2006 (Euro 4 and 5)



- Taxi and private hire diesel vehicles registered from approx. 2010/11 (Euro 5)

We are also updating the Taxi Licensing Policy & Conditions to ensure taxis are compliant.

Working with public transport

We want to encourage better use of the park & ride and public transport to support the zone.

We're working closely with bus operators to help them secure funding to upgrade their engines. We anticipate that all buses will be compliant by the time a zone is introduced, and that operators will respond to any increased demand.

In addition, we're looking to extend the operating hours for the park & ride.

Support for the local economy

We have a resilient, unique economy but we accept that some businesses might need help adjusting to the CAZ in the short term. We are therefore inviting business owners to meet with us at our regular surgeries. Details are online at www.bathnes.gov.uk/breathe.

Our assessment indicates that the majority of vehicles (75%) will naturally become compliant by 2021, and we will be doing everything we can to ensure that people have the information they need to get compliant in cost-effective ways, or find alternative transport into Bath.

Other supporting measures

The following proposals are dependent on funding from the Government and any surplus revenue from the zone in the future.

Projects under way

- Retrofitting older buses
- An air quality awareness campaign to encourage a shift in travel behaviour

Subject to funding by 2021

- Additional retrofitting of older buses
- Anti-idling enforcement
- Reduced cost of parking permits for ultra-low emission vehicles such as fully electric cars
- Additional and improved cycle parking
- Additional and improved electric vehicle charging points
- Extended opening hours at the park & ride sites, plus secure overnight parking
- Walk/scoot/cycle-to-school initiatives
- Financial support schemes for residents and businesses that need it most

Subject to funding post-2021

- Additional improvements to walking and cycling routes
- Introduction of electric cycle hire in the city
- Expansion of low-emission car and van clubs in the city
- Public transport improvements on key routes into the city and within the zone



- Smaller park & ride sites along existing bus routes
- Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles

How would the zone be funded?

The Government would provide all of the necessary funds. Costs would not fall to the local taxpayer. Revenue from the zone would go towards its operating costs, or be re-invested in measures to encourage cleaner travel and transport in Bath.



How did we reach this proposal?

We arrived at this proposal for a Class D Clean Air Zone (CAZ) after considerable analysis and research lasting over 12 months, drawing on local and national data sets and detailed traffic and air quality modelling.

This included looking at a wide range of options to assess what measures could reduce NO₂ to within legal limits by 2021. In spring, these were narrowed down to three different types of Charging Clean Air Zone:

The original options

Class B CAZ: Charges for higher emission buses, coaches, private hire vehicles, taxis and HGVs

Class C CAZ: Charges as outlined for B, including higher emission LGVs/vans

Class D CAZ: Charges as outlined for B and C, including higher emission cars

We engaged the public on these proposals (including a range of supporting measures) and the feedback we received has helped to shape our preferred option.

In-depth analysis has since indicated that CAZ Classes B and C would not sufficiently reduce NO₂ in the time permitted by the Government.

Technical modelling tells us that a Class D CAZ is our best course of action to improve air quality by 2021.

Our assessment has been developed in accordance with Government guidelines and is under consideration by the Joint Air Quality Unit (JAQU). It has been carefully assessed for health, economic and financial impacts.

You can read the full report for this proposal online at www.bathnes.gov.uk/breathe.

Find out more and have your say

This is a public consultation on our preferred option for a Class D CAZ for Bath. It is open until 26 November 2018, and more information can be found online or at a B&NES library or One Stop Shop.

A decision needs to be reached by the Council in December 2018, and your views will be taken into account.

Complete a questionnaire

We're very keen to hear your views. To find out more and complete a questionnaire:

- Go to www.bathnes.gov.uk/breathe
- Visit a B&NES library or One Stop Shop

The closing date for comments is 26 November 2018 (23:59 hrs).

Attend an event

We're holding regular drop-in events and public surgeries until 26 November.

Here we can discuss your concerns and answer questions.

Please go online for details or call 01225 39 40 41.

Keep up to date

Should our proposal be approved, a Class D CAZ would be in place by the end of 2020.

- Subscribe to our newsletter at www.bathnes.gov.uk/breathe
- Follow us on Twitter and Facebook
 facebook.com/bathnes
 twitter.com/bathnes
- Use **#BathBreathes2021**



Appendix B. Copies of the Questionnaires

Public Consultation: For individuals and interest groups

A Class D, Charging Clean Air Zone for Bath

This is a six-week consultation on the Council's proposal to introduce a **Class D, Charging Clean Air Zone (CAZ)** in central Bath by the end of 2020. The aim is to urgently reduce harmful levels of nitrogen dioxide (NO₂) in the shortest possible time, and by 2021 at the latest, as directed by the Government.

We're keen to hear your views. If you wish to provide written feedback, please complete this questionnaire no later than:

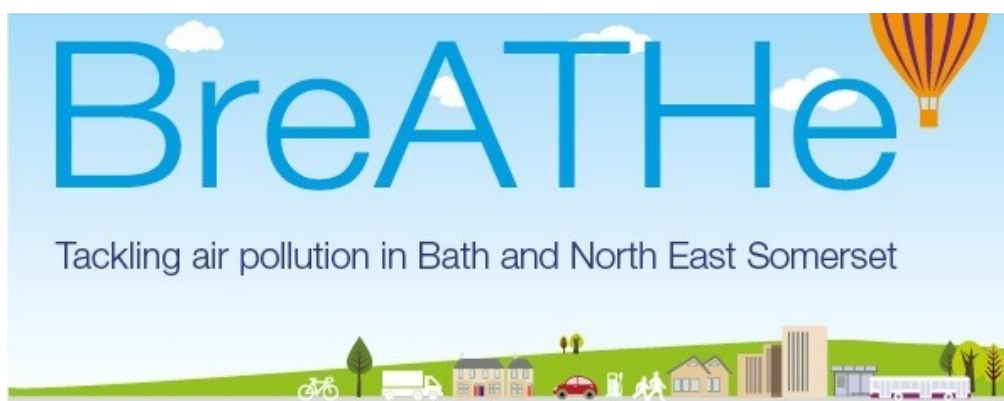
26 November 2018 (23:59 hours).

Who should take part?

Anyone can take part, including those who live or work in the city, or who regularly visit or travel through Bath.

If you're representing an **interest group**, you can also use this questionnaire or write a letter to: CAZ Public Consultation, Environmental Services, Lewis House, Manvers Street, Bath, BA1 1JG.

If you're a **business** (including sole traders or the self-employed), **an organisation which operates a fleet of vehicles**, or **you represent business interests**, please complete [this questionnaire](#) instead.



Public Consultation: For individuals and interest groups

Why are we consulting?

There are a number of places in Bath where NO₂, caused by vehicle emissions, exceeds EU and national limits.

A high level of NO₂ makes heart and lung conditions worse. 12,000 people in Bath and North East Somerset suffer from asthma, and exposure to NO₂ at high levels can trigger attacks. Over the longer term it is linked to reduced lung development in children and the increased possibility of heart attacks and dementia in older people.

The Government has told the Council, along with 27 other local authorities, to reduce NO₂ levels in the shortest possible time (and by 2021 at the latest). It is providing all of the funds to help us do this.

After more than 12 months of in-depth analysis, we're now consulting on our preferred option for achieving this target, which is a Class D, Charging Clean Air Zone (CAZ) to be introduced in central Bath by the end of 2020.

What is a Class D Clean Air Zone?

Introducing a Class D CAZ would mean charging drivers of all higher emission vehicles – including **buses, coaches, HGVs, private hire vehicles, taxis, LGVs/vans and cars** – to drive in the proposed zone (the city centre). Lower emission vehicles would not have to pay. Alongside the charging zone, we're considering a range of support to reduce the impact on residents and local businesses, including local exemptions and concessions for vulnerable groups. All of this information is outlined in more detail during the questionnaire.

How we reached this proposal

We have looked at a range of other options, including a **Class B CAZ** (charging higher emission buses, coaches and HGVs only) and a **Class C CAZ** (charging all higher emission vehicles in Class B, plus LGVs). However, our extensive analysis has shown that none of these other options could achieve the required reduction of NO₂ in the time permitted by the Government.

No decisions have yet been made. The Council must reach a decision in December 2018 and your views will be taken into account.

A full report on this proposal, including supporting analysis and a summary of the proposal, is available at [Bath Breathes](#) or to view at your local B&NES library or One Stop Shop.

Public Consultation: For individuals and interest groups

About the questionnaire

We're really keen to hear your views. This is your chance to find out more, express your opinions on each aspect of the proposal and comment on the proposal as a whole.

In each section of the questionnaire, you'll find background information and an opportunity to comment on the following:

1. The proposed zone boundary
2. Proposed charges for higher emission vehicles
3. Minimum emissions standards and exemptions
4. Proposed local concessions
5. How the proposed charging zone might change the way you travel
6. Proposed supporting measures
7. How you might be affected by the zone
8. Further comments on the proposal
9. About you

In 'Further comments' you may also suggest any alternative schemes that, in your opinion, would reduce the levels of NO₂ in the city by 2021 at the latest.

Data protection

The responses to this consultation questionnaire are anonymous and no personal data will be taken.

Please click through the questionnaire using the 'Next' buttons, and if you want to go back to a previous question use the 'Prev' buttons.

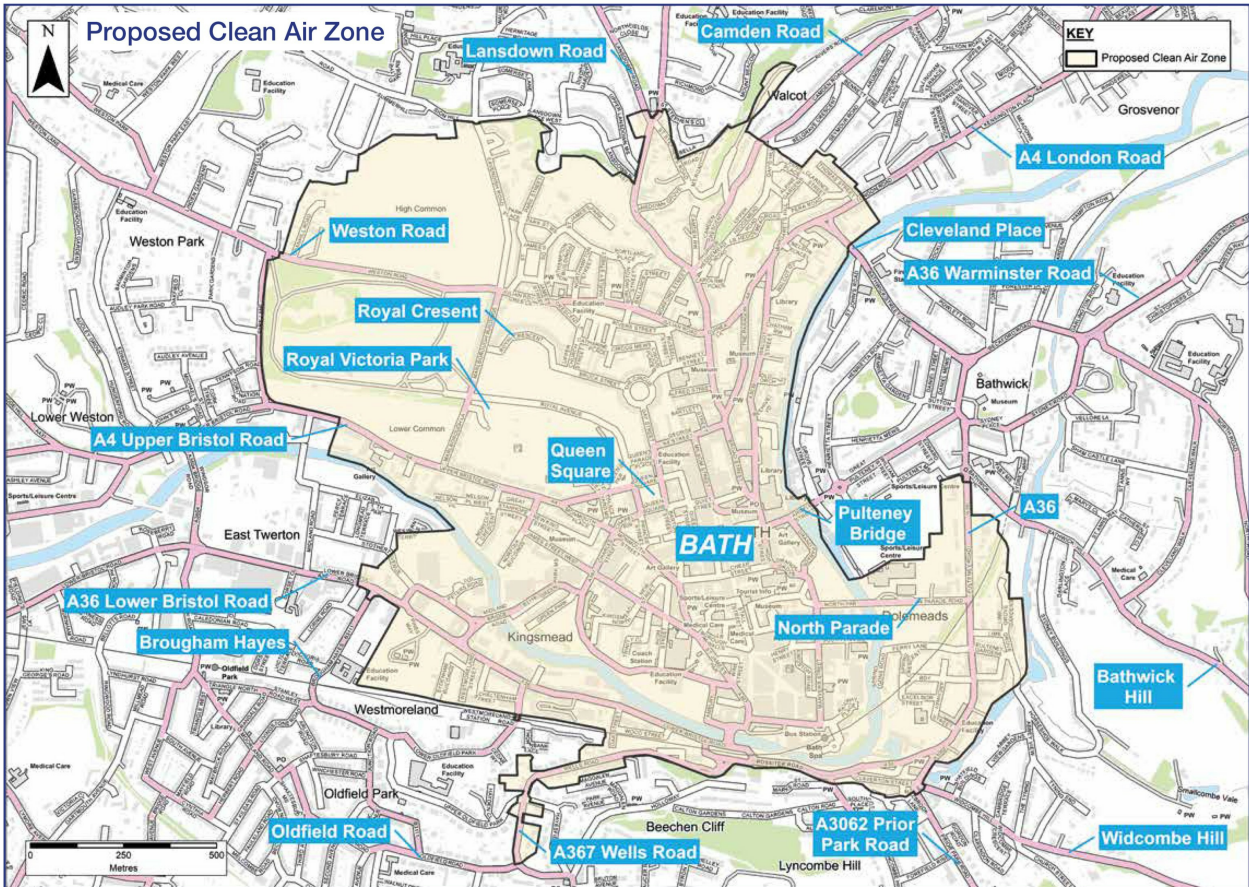
Public Consultation: For individuals and interest groups

Section 1: The proposed zone boundary

Our extensive analysis shows that a Class D Charging CAZ, charging all higher emission vehicles to enter or drive within the zone, would encourage a shift to cleaner vehicles or alternative transport.

The map below shows the area of Bath that we are proposing to include within the zone. It's been amended since Spring 2018 to take account of residents' views, and has been carefully drawn to reduce opportunities for short cuts.

Our assessments also show that there will be improved air quality on arterial routes, and that the majority of roads outside of the zone would not see an increase in traffic (but would see an in improvement in air quality). Some roads might see a slight increase in traffic only, but these would be closely monitored and any problems would be addressed through traffic management.



1. Are there any changes to the boundary of the proposed zone that you think we should consider? If your comment relates to a specific location, please provide street names.

Public Consultation: For individuals and interest groups

Section 2: Proposed charges for higher emission vehicles

Charges would only apply to non-compliant, higher emission vehicles entering or driving within the zone. These are Pre-Euro 6 diesel vehicles (registered before c.2015) and Pre-Euro 4 petrol vehicles (registered before c.2006), including hybrids.

We are proposing the following charges:

- £9 for higher emission cars, taxis and LGVs/vans
- £100 for higher emission buses, coaches and HGVs

Exemptions and concessions would apply.

Charges would apply once in every 24-hour period (midnight to midnight) when entering or driving in the zone. This would apply 7 days a week, 365 days a year. If your vehicle is parked in the zone and does not move, you would not pay the charge.

These charge levels are based on considerable analysis of data and a local survey of 1000 drivers of higher emission vehicles. They are designed to improve air quality by encouraging a shift to lower emission vehicles or alternative means of transport.

**2. To what extent do you agree or disagree with the following statement:
“The proposed charges will be effective in encouraging people to change to lower emissions vehicles or to use alternative means of transport to access the City”**

- ☐ Agree strongly
- ☐ Disagree
- ☐ Agree
- ☐ Disagree strongly
- ☐ Neither agree nor disagree
- ☐ Don't know

3. Please explain your answer or suggest an alternative charge that you believe would be more effective in helping us to meet our air quality targets.

Public Consultation: For individuals and interest groups

Section 3: Minimum emissions standards and exemptions

We are proposing that vehicles meeting the Government's minimum emissions standards would not be charged in the proposed zone. National exemptions apply for vehicles in certain tax classes, and we are proposing some local exemptions.

4. Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, please indicate whether your main vehicle would fall into any of the categories listed below and therefore not be charged. If you do not drive a vehicle or this question does not apply to you, please skip to question 5.

Please tick one or all that apply:

- ☐ **Euro 6 diesel vehicle** registered from approx. 2015 (Minimum emission standards for the proposed zone - not charged)

☐ **Euro 4, 5 or 6 petrol vehicle** registered from approx. 2006 (Minimum emission standards for the proposed zone - not charged)

☐ **Fully electric and hydrogen fuel cell vehicle** (Minimum emission standards for the proposed zone)

☐ **A vehicle within the historic vehicle tax class** (Nationally exempt vehicles)
- ☐ **A vehicle within the disabled passenger tax class** (Nationally exempt vehicles)

☐ **Motorcycle or moped** (Proposed local exemptions - applying to Bath's proposed zone only)

☐ **A vehicle driven by a disabled driver** (Proposed local exemptions - applying to Bath's proposed zone only)

☐ None apply

Public Consultation: For individuals and interest groups

Section 4: Proposed local concessions

Alongside national and proposed local exemptions, we're looking at a range of local concessions that would apply to the proposed zone. These include giving vulnerable groups more time to adapt to the zone.

The proposed concessions are all subject to further assessment and the Council meeting its air quality targets in the shortest possible time.

5. Thinking ahead to the proposed introduction of the Clean Air Zone in two years' time, are any of the following proposed local concessions likely to apply to you or your vehicle? If you don't drive, tick 'none apply'.

Delaying the introduction of charges until 1 Jan 2022 for:

- ☐ Euro 4/5 diesel vehicles being used by blue badge holders
- ☐ Euro 4/5 diesel vehicles being used by registered healthcare providers
- ☐ Euro 5 diesel hybrid vehicles
- ☐ None apply

6. Below is the full list of concessions that we’re currently looking at to help reduce the impact of the zone on the local community and economy. Please can you consider each one and rank them in terms of importance to you or the group you represent.

Please identify your top 4, ranked them 1 to 4 where 1 is most important

	1	2	3	4
Euro 4/5 diesel vehicles being used by blue badge holders (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel vehicles being used by registered healthcare providers (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel vehicles being used by registered community transport providers (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel accessible taxis and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 5 diesel hybrid vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 5 diesel taxis and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery vehicles or breakdown trucks over 3,500 kg (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency service vehicles (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the Special Vehicles tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the Special Types tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the General Haulage Vehicle tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel coaches with valid educational trip permits (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Do you have any suggestions for further concessions that you think would be effective in supporting you, your family or the group you represent? Please also outline your reasons.

Public Consultation: For individuals and interest groups

Section 5: How the proposed charging zone might change the way you travel

**8. If you drive a non-compliant vehicle (i.e. none of the national minimum standards, proposed exemptions or concessions outlined in Q4, Q5 and Q6 apply to your vehicle) what do you think you will do if the zone is introduced in late 2020?
If you expect to be driving a compliant vehicle, you don't drive a vehicle or you're responding on behalf of a group, please skip to Section 6.**

Please tick one

- ☐ Minimise driving through the zone and pay the charge
- ☐ Change the way I typically travel (switch to walking, cycling or public transport)
- ☐ Drive in the zone as normal and pay the charge
- ☐ Not sure
- ☐ Change to a compliant vehicle
- ☐ Other (please outline)

Public Consultation: For individuals and interest groups

Section 6: Proposed supporting measures

Alongside the Charging Clean Air Zone, we’re considering a package of supporting measures that would help to improve air quality in the city and lessen the impact of the CAZ on residents and local businesses. These are set out in the following questions.

They are all subject to further analysis, securing funds from the Government, and meeting our air quality reduction targets.

9. We’re considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for you, your family or the people you represent?

Please identify your top 4, ranked from 1 to 4 where 1 is most important.

	1	2	3	4
Retrofitting high-emission buses with cleaner engines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-idling enforcement – to encourage vehicles to switch engines off when stationary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Additional and improved cycle parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing the cost of parking permits for ultra-low emission vehicles such as fully electric cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More electric vehicle charging points	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extended opening hours at the park and ride	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overnight secure parking at the park and ride	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Walk/scoot/cycle-to-school initiatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support for residents and local businesses that need it most to upgrade from non-compliant cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support for local businesses to upgrade from non-compliant commercial vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for you, your family or the group you represent?

Please identify your top 3, ranked from 1 to 3 where 1 is most important.

	1	2	3
Additional improvements to walking and cycling routes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of electric cycle hire in the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expansion of low-emission car and van clubs in the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public transport improvements on key routes into the city and within the zone	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smaller park & ride sites along existing bus routes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. Please let us know of any other measures that might help you or the group you represent to adapt to the proposed charging zone

Public Consultation: For individuals and interest groups

Section 7: How you might be affected by the zone

12. We want to find out if any particular groups of people will be affected (positively or negatively) by the introduction of a Clean Air Zone.

Please use the space below to tell us if you think you, or an individual or group you represent, will be affected due to personal characteristics or circumstances (such as age, disability, parental/carer responsibilities etc).

Public Consultation: For individuals and interest groups

Section 8: Further comments on the proposal

13. Please share any further thoughts you have about this proposal, or any comments you have about this proposal as a whole. This might include any alternative approaches that you think would be effective in meeting our air quality targets by 2021 at the latest.

Public Consultation: For individuals and interest groups

Section 9: About you

You're nearly finished!

The Council is committed to ensuring its services are accessible to everyone. The following questions help us to understand whether different groups of people have different views. Some of this information can be regarded as highly personal and so ‘prefer not to say’ options have been included.

14. Are you responding:

Please tick one

- ☐ On behalf of you/your family
- ☐ Other (please state below)
- ☐ On behalf of a group of individuals. (If this is an organisation, please state its name below)

Please state

15. Do you drive a vehicle?

Please tick one

- ☐ Yes
- ☐ No
- ☐ Does not apply

16. How often do you drive into or through the proposed zone in Bath (see Map)?

Please tick one

- ☐ Daily
- ☐ Less than once a week
- ☐ Several times a week
- ☐ I don't drive into Bath
- ☐ Once a week
- ☐ Does not apply

17. Where do you live?

Please tick one

- ☐ Prefer not to say
- ☐ In B&NES but not in Bath (please state where below)
- ☐ In the zone (see map)
- ☐ Outside of B&NES (please state where below)
- ☐ In Bath but outside of the zone

Please state

18. Please provide the first four digits of your postcode

19. What would best describe your professional or working status?

Please tick one

- ☐ Prefer not to say
- ☐ Retired
- ☐ Employed
- ☐ Not in work
- ☐ Self-employed
- ☐ Student

20. What was your age at your last birthday?

21. Do you have any dependent children?

Please tick one

- ☐ Prefer not to say
- ☐ Yes
- ☐ No

22. Do you consider yourself to have a long-term condition that limits your day-to-day activities?

Please tick one

- ☐ Prefer not to say
- ☐ Yes
- ☐ No

23. How do you define your gender?

Please tick one

- ☐ Prefer not to say
- ☐ Female
- ☐ Male
- ☐ Other (please state)

Public Consultation: For individuals and interest groups

Section 11: Conclusion

Thank you for completing this consultation questionnaire. The Council must reach a decision on this proposal in December 2018 and your views will be taken into account.



Public Consultation: For businesses and organisations

A Class D, Charging Clean Air Zone for Bath

This is a six-week consultation on the Council's proposal to introduce a **Class D, Charging Clean Air Zone (CAZ)** in central Bath by the end of 2020. The aim is to urgently reduce harmful levels of nitrogen dioxide (NO₂) in the air as soon as possible, as directed by the Government.

We're keen to hear your views. If you wish to provide written feedback, please complete this questionnaire no later than:

26 November 2018 (23:59 hours).

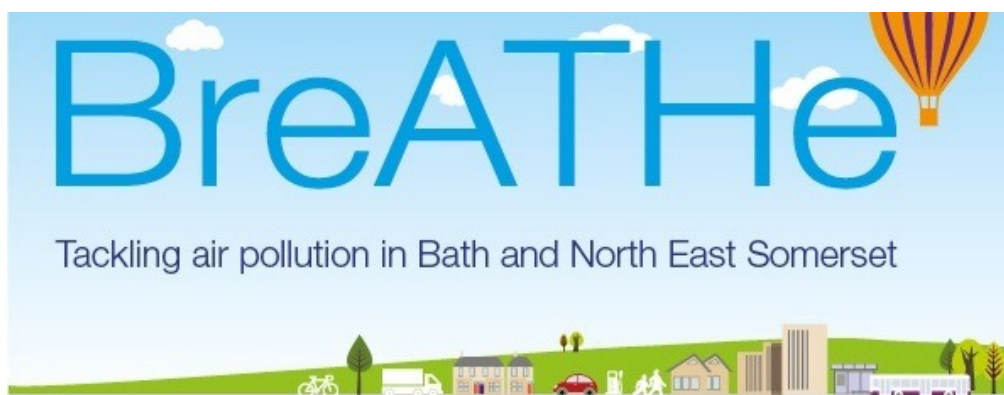
Who should take part?

Anyone can take part in this consultation.

Please use this questionnaire if you're responding on behalf of a **business** (including sole traders or the self-employed), **an organisation that operates a fleet of vehicles**, or **you represent business interests**.

Alternatively you can write a letter to: CAZ Public Consultation, Environmental Services, Lewis House, Manvers Street, Bath, BA1 1JG.

If you are responding as an individual or on behalf of an interest group, such as a residents' association, please complete [this questionnaire](#) instead.



Public Consultation: For businesses and organisations

Why are we consulting?

There are a number of places in Bath where NO₂, caused by vehicle emissions, exceeds EU and national limits.

A high level of NO₂ makes heart and lung conditions worse. 12,000 people in Bath and North East Somerset suffer from asthma, and exposure to NO₂ at high levels can trigger attacks. Over the longer term it is linked to reduced lung development in children and the increased possibility of heart attacks and dementia in older people.

The Government has told the Council, along with 27 other local authorities, to reduce NO₂ levels in the shortest possible time (and by 2021 at the latest). It is providing all of the funds to help us do this.

After more than 12 months of in-depth analysis, we're now consulting on our preferred option for achieving this target, which is a Class D, Charging Clean Air Zone (CAZ) to be introduced in central Bath by the end of 2020.

What is a Class D Clean Air Zone?

Introducing a Class D CAZ would mean charging drivers of all higher emission vehicles – including **buses, coaches, HGVs, private hire vehicles, taxis, LGVs/vans and cars** – to drive in the proposed zone. Lower emission vehicles would not have to pay.

Alongside the charging zone, we're considering a range of support to reduce the impact on residents and local businesses, including local exemptions and concessions for vulnerable groups. All of this information is outlined in more detail during the questionnaire.

How we reached this proposal

We have looked at a range of other options, including a **Class B CAZ** (charging higher emission buses, coaches and HGVs only) and a **Class C CAZ** (charging all higher emission vehicles in Class B, plus LGVs). However, our extensive analysis has shown that none of these other options could achieve the required reduction of NO₂ in the time permitted by the Government.

No decisions have yet been made. The Council must reach a decision in December 2018 and your views will be taken into account.

The consultation is your chance to find out more, express your opinions on each aspect of the proposal, and comment on the proposal as a whole. You may also suggest any alternative schemes that, in your opinion, would reduce the levels of NO₂ in the city by 2021 at the latest.

A full report on this proposal, including supporting analysis and a summary of the proposal, is available at [Bath Breathes](#) or to view at your local B&NES library or One Stop Shop.

Public Consultation: For businesses and organisations

About this questionnaire

We're really keen to hear your views. This is your chance to find out more, express your opinions on each aspect of the proposal and comment on the proposal as a whole.

In each section of the questionnaire, you'll find background information and an opportunity to comment on the following:

1. The proposed zone boundary
2. Proposed charges for higher emission vehicles
3. Minimum emissions standards and exemptions
4. Proposed local concessions
5. How the proposed charging zone might change the way your business or organisation operates
6. Proposed supporting measures
7. How your business or organisation might be affected by the zone
8. Further comments on the proposal
9. About your business or organisation

Data protection

The responses to this consultation questionnaire are anonymous and no personal data will be taken.

Please click through the questionnaire using the 'Next' buttons, and if you want to go back to a previous question use the 'Prev' buttons.

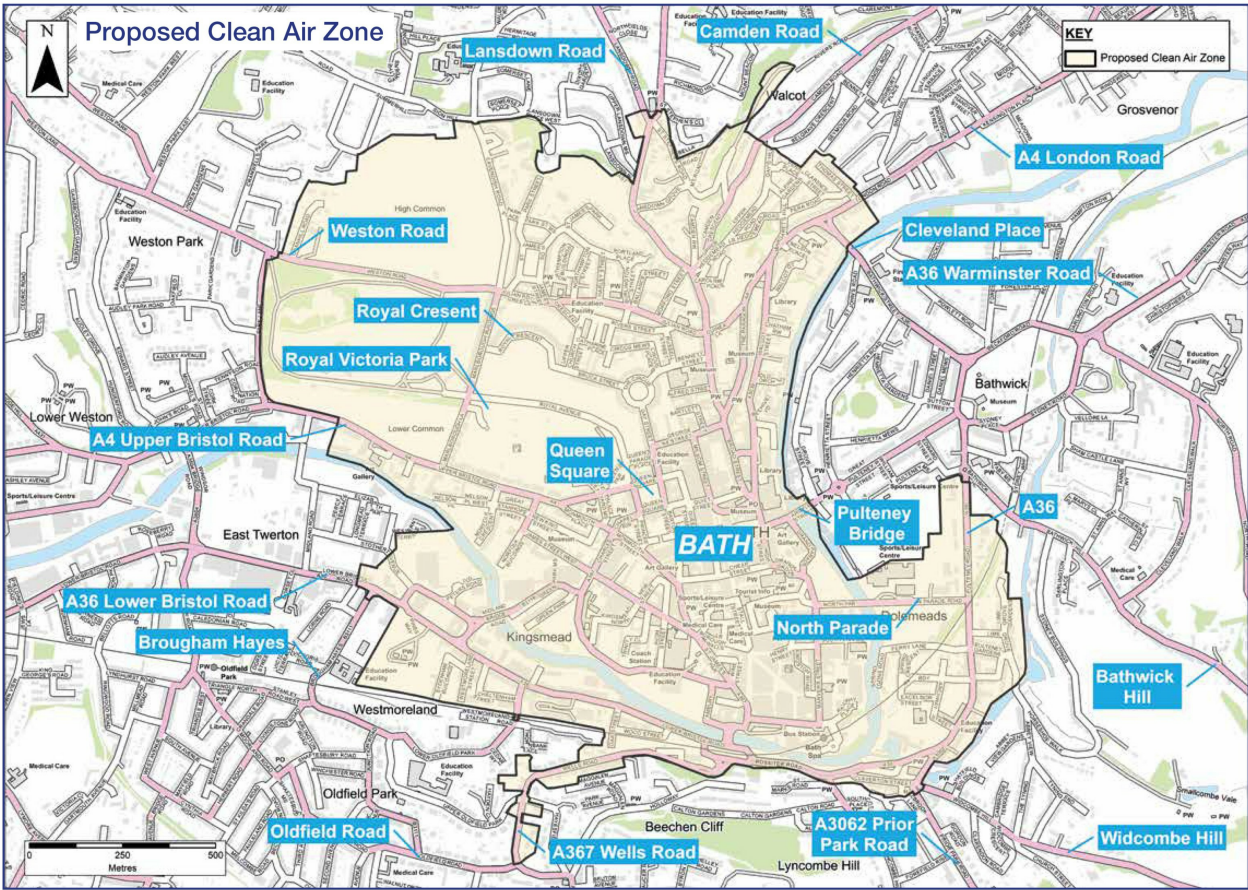
Public Consultation: For businesses and organisations

Section 1: The proposed zone boundary

Our extensive analysis shows that a Class D Charging CAZ, charging all higher emission vehicles to enter or drive within the zone, would encourage a shift to cleaner vehicles or alternative transport.

The map below shows the area of Bath that we are proposing to include within the zone. It's been amended since Spring 2018 to take account of residents' views, and has been carefully drawn to reduce opportunities for short cuts.

Our assessments also show that there will be improved air quality on all arterial routes, and that the majority of roads outside of the zone would not see an increase in traffic (but would see an in improvement in air quality). Some roads might see a slight increase in traffic only, but these would be closely monitored and any problems would be addressed through traffic management.



1. Are there any changes to the boundary of the proposed zone that you think we should consider? If your comment relates to a specific location, please provide street names.

Public Consultation: For businesses and organisations

Section 2: Proposed charges for higher emission vehicles

Charges will only apply to non-compliant, higher emission vehicles entering or driving within the zone. These are Pre-Euro 6 diesel vehicles (registered before c.2015) and Pre-Euro 4 petrol vehicles (registered before c.2006).

We are proposing the following charges:

- £9 for higher emission cars, taxis and LGVs/vans
- £100 for higher emission buses, coaches and HGVs

Exemptions and concessions would apply.

Charges would apply once in every 24-hour period (midnight to midnight) when entering or driving in the zone. This would apply 7 days a week, 365 days a year. If your vehicle is parked in the zone and does not move, you would not pay the charge.

These charge levels are based on considerable analysis of data and a local survey of over 1,000 drivers of higher emission vehicles. They are designed to improve air quality by encouraging a shift to lower emission vehicles or alternative means of transport.

2. To what extent do you agree or disagree with the following statement

“The proposed charges will be effective in encouraging businesses and organisations to change to lower emissions vehicles or change the way they operate in the city”

- | | |
|--|---|
| <input type="radio"/> Agree strongly | <input type="radio"/> Disagree |
| <input type="radio"/> Agree | <input type="radio"/> Disagree strongly |
| <input type="radio"/> Neither agree nor disagree | <input type="radio"/> Don't know |

3. Please explain your answer or suggest an alternative charge that you believe would be more effective in helping us to meet our air quality targets.

Public Consultation: For businesses and organisations

Section 3: Minimum emissions standards and exemptions

We are proposing that vehicles meeting the Government's minimum emissions standards would not be charged in the proposed zone. National exemptions apply for vehicles in certain tax classes, and we are proposing some local exemptions.

4. Does your business or organisation own or operate vehicles that travel into or through the proposed zone in Bath?
If no, please skip to question 9.

- ☐ Yes
- ☐ No

5. How many vehicles do you own or operate and what type of vehicles are they?
Please state the number of vehicles against all that apply

Car

LGV/van

HGV

Taxi/Private hire vehicle

Motorbike/moped

Bus

Coach

Other (please state)

The following vehicles would not be charged to drive in the proposed zone:

Minimum emission standards for the proposed zone:

- Euro 6 diesel vehicles registered from approx. 2015
- Euro 4, 5 or 6 petrol vehicles registered from approx. 2006
- Fully electric and hydrogen fuel cell vehicles

Nationally exempt vehicles:

- Vehicles within the historic vehicle tax class
- Vehicles within the disabled passenger tax class

Proposed local exemptions - applying to Bath’s proposed zone only:

- Motorcycles or mopeds
- Vehicles in the Special Concessionary tax class not exempt elsewhere including agricultural machines, mowing machines, electric, gritter, snowplough and steam vehicles
- Vehicles in the Exempt Vehicles tax class not exempt elsewhere including ‘limited use’ vehicles, vehicles used by a disabled person and National Health Service vehicles
- Vehicles passing through the charging zone on a valid trade licence plate

6. Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, to the best of your knowledge, please indicate (or estimate) how many of the vehicles you told us about in Question 5 would fall into the categories listed above and therefore would not be charged.

Please state the number of vehicles

Car

LGV/van

HGV

Taxi/Private hire vehicle

Motorbike/moped

Bus

Coach

Other (please state)

7. Is there any other information you would like us to know about your vehicle or fleet of vehicles?

Public Consultation: For businesses and organisations

Section 4: Proposed local concessions

Alongside national and proposed local exemptions, we’re looking at a range of local concessions that would apply to the proposed zone. These include giving vulnerable groups more time to adapt to the zone.

The proposed concessions are all subject to further assessment and the Council meeting its air quality targets by 2021 at the latest.

8. Thinking ahead to the proposed introduction of the Clean Air Zone in two years’ time, are any of the following proposed local concessions likely to apply to the vehicles owned or operated by your business or organisation?

- ☐ Euro 4/5 diesel vehicles being used by blue badge holders (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Euro 4/5 diesel vehicles being used by registered healthcare providers (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Euro 4/5 diesel vehicles being used by registered community transport providers (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Euro 4/5 diesel accessible taxi and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Euro 5 diesel hybrid vehicles (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Euro 5 diesel taxi and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)
- ☐ Recovery vehicles or breakdown trucks over 3,500 kg (Delaying the introduction of charges until 1 Jan 2025)
- ☐ Emergency service vehicles (Delaying the introduction of charges until 1 Jan 2025)
- ☐ Vehicles in the Special Vehicles tax class (Delaying the introduction of charges until 1 Jan 2025)
- ☐ Vehicles in the Special Types tax class (Delaying the introduction of charges until 1 Jan 2025)
- ☐ Vehicles in the General Haulage Vehicle tax class (Delaying the introduction of charges until 1 Jan 2025)
- ☐ Euro 4/5 diesel coaches with valid educational trip permits (Delaying the introduction of charges until 1 Jan 2025)
- ☐ None apply

9. Below is the full list of concessions that we’re currently looking at to help reduce the impact of the zone on the local community and economy. Please can you consider each one and rank them in terms of importance to your business and operations, including your staff, suppliers and customers. Alternatively, please skip this question if none apply.

Please identify your top 3, ranked from 1 to 3 where 1 is most important.

	1	2	3
Euro 4/5 diesel vehicles being used by blue badge holders (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel vehicles being used by registered healthcare providers (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel vehicles being used by registered community transport providers (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel accessible taxi and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 5 diesel hybrid vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 5 diesel taxi and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery vehicles or breakdown trucks over 3,500 kg (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emergency service vehicles (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the Special Vehicles tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the Special Types tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles in the General Haulage Vehicle tax class (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Euro 4/5 diesel coaches with valid educational trip permits (Delaying the introduction of charges until 1 Jan 2025)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Do you have any suggestions for further concessions that you think would be effective in supporting your business or operations, including your staff, suppliers and customers? Please also outline your reasons.

Public Consultation: For businesses and organisations

Section 5: How the proposed charging zone might change the way your business/organisation operates

11. If your business has non-compliant vehicles, and none of the proposed exemptions or local concessions apply, what do you think your business or organisation would do if the zone is introduced in late 2020? If you expect all of your vehicles to be compliant or you don't operate vehicles directly, please skip to Section 6.

Please tick all that apply

- ☐ Minimise driving through the zone and pay the charge

☐ Drive in the zone as normal and pay the charge

☐ Change to compliant vehicle(s)

☐ Other (please outline)
- ☐ Reorganize the fleet to ensure only compliant vehicles drive through the zone

☐ Change the way employees typically travel on business (not commuting to work) e.g. pool cars, walking, cycling or public transport

☐ Not sure

Public Consultation: For businesses and organisations

Section 6: Proposed supporting measures

Alongside the Charging Clean Air Zone, we’re considering a package of supporting measures that would help to improve air quality in the city and lessen the impact of the charging zone on residents and local businesses.

They are all subject to further analysis, securing funds from the Government, and meeting our air quality reduction targets.

12. We’re considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for your business or organisation? Alternatively, please skip this question if none apply.

Please identify your top 4, ranked from 1 to 4 where 1 is most important.

	1	2	3	4
Retrofitting high-emission buses with cleaner engines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-idling enforcement – to encourage vehicles to switch engines off when stationary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Additional and improved cycle parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing the cost of parking permits for ultra-low emission vehicles such as fully electric cars and vans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More electric vehicle charging points	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extended opening hours at the park and ride	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overnight secure parking at the park and ride	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Walk/scoot/cycle-to-school initiatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support for residents and local businesses that need it most to upgrade from non-compliant pre-Euro 4 cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support for local businesses to upgrade from non-compliant pre-Euro 6 commercial vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for your business or organisation? Alternatively, please skip this question if none apply.

Please identify your top 3, ranked from 1 to 3 where 1 is most important.

	1	2	3
Additional improvements to walking and cycling routes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of electric cycle hire in the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expansion of low-emission car and van clubs in the city	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public transport improvements on key routes into the city and within the zone	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smaller park & ride sites along existing bus routes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Please let us know of any other measures that might help your business or organisation, including your staff, suppliers and customers adapt to the proposed charging zone?

15. Please tell us about any steps that your business has already taken or is planning to make to reduce air pollution in Bath?

Public Consultation: For businesses and organisations

Section 7: How your business or organisation might be affected by the zone

16. We want to find out if any particular types of business or organisation will be affected (positively or negatively) by the introduction of a Clean Air Zone. Please use the space below to tell us if you think your business or organisation will be affected due to the particular nature of your operations or the specifics of your staff, suppliers or customers.

**Public Consultation: For businesses and
organisations**

Section 8: Further comments on the proposal

17. Please share any further thoughts you have about this proposal, or any comments you have about this proposal as a whole relating to your business or organisation. This might include any alternative approaches that you think would be effective in meeting our air quality targets by 2021 at the latest.

Public Consultation: For businesses and organisations

Section 9: About your business or organisation

You're nearly finished!

The Council is committed to ensuring its services are accessible to everyone. The following questions help us to understand whether different groups of people have different views.

18. Please specify the type of business you are responding on behalf of:

- ☐ Independent retailer

☐ National or multi retailer

☐ SME

☐ Hotel/B&B

☐ Restaurant/bar

☐ Please specify
- ☐ Transport operator

☐ Educational institution

☐ Freight or distribution company

☐ Health organisation

☐ Self employed

19. What is the name of your business or organisation?

20. Please tick to confirm you are authorised to respond on behalf of this business or organisation.

- ☐ Yes, I confirm

21. How often do your vehicles drive into or through the proposed zone in Bath (see Map)

Please tick one

- ☐ Daily

☐ Several times a week

☐ Once a week
- ☐ Less than once a week

☐ I don't drive into Bath

☐ Does not apply

22. Where is your business or organisation located?

Please tick one

- ☐ Prefer not to say
- ☐ In B&NES but not in Bath (please state where below)
- ☐ In the zone (see map)
- ☐ Outside of B&NES (please state where below)
- ☐ In Bath but outside of the zone

Please state

23. Please provide the first four digits of your postcode:

24. How many people do you employ?

**Public Consultation: For businesses and
organisations**

Section 11: Conclusion

Thank you for completing this consultation questionnaire. The Council must reach a decision on this proposal in December 2018 and your views will be taken into account.

If you'd rather talk to us, you can attend one of our drop-in sessions or book a slot at one of our public surgeries. Go to [Bath Breathes](#) for details.



Appendix C. Analysis of Data from the Questionnaires

C.1

C.1 Individuals and Groups

Response Rate

Table 17-2 shows the response rate to the questionnaire for individuals and groups. In total 7608 responses were received.

Table 17-2: Overall response rate to the Questionnaire for individuals and groups

Question Number	Question type	Respondents answering the question		Respondents that skipped the question	
		Number	Percentage of Respondents	Number	Percentage of Respondents
1 – Boundary	Free text	5393	71%	2215	29%
2 – Charge	Closed question	7318	96%	290	4%
3 – Charge	Free text	6204	82%	1404	18%
4 – Vehicle Compliance	Closed question	6577	86%	1031	14%
5 – Concession	Closed question	6077	80%	1531	20%
6 – Concession	Closed question	4968	65%	2640	35%
7 – Concession	Free text	3672	48%	3936	52%
8 – Vehicle Compliance	Closed question	4872	64%	2736	36%
9 – Supporting Measures	Closed question	6175	81%	1433	19%
10 – Supporting Measures	Closed question	6054	80%	1554	20%
11 – Supporting Measures	Free text	3286	43%	4322	57%
12 – Affected Groups	Free text	4472	59%	3136	41%
13 – Alternative Approaches	Free text	5319	70%	2289	30%
14 – Responding on Behalf Of	Closed question	6550	86%	958	14%
15 – Do You Drive	Closed question	6644	87%	964	13%
16 – Drive into Zone	Closed question	6633	87%	975	13%
17 – Residence	Closed question	6517	86%	1091	14%
18 – Postcode	Free text	6280	82%	1328	18%
19 – Employment	Closed question	6614	87%	994	13%
20 – Age	Free text	5956	78%	1652	22%

21 – Dependents	Closed question	6546	86%	1062	14%
22 – Disability	Closed question	6565	86%	1043	14%
23 – Gender	Free text	6571	86%	1037	14%

Respondent Type

Type of Respondent

Table 17-3 contains the responses to Question 14, 'Are you responding on behalf of you/your family, on behalf of a group, or other'.

Table 17-3: Responses to Question 14

<i>Are you responding...</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	6650	-
Total number of respondents that did not answer this question	958	-
On behalf of you/your family	6430	97
On behalf of a group of individuals. (If this is an organisation, please state its name below)	111	2
Other (please state below)	109	2

Note that percentages are calculated based on the number of respondents to this question – not the total number of questionnaire respondents

Home Location of Respondents

Table 17-4 contains the responses to Question 17, 'Where do you live?'.

Table 17-4: Responses to Question 17

<i>Where do you live?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	6517	-
Total number of respondents that did not answer this question	1091	-
Prefer not to say	190	3
In the zone (see map)	553	9
In Bath but outside of the zone	3589	55
In B&NES but not in Bath (please state where below)	1179	18
Outside of B&NES (please state where below)	1006	15

Note that percentages are calculated based on the number of people who responded to this question– not the total number of questionnaire respondents.

Question 18 asked respondents to provide the first 4 digits of their postcodes. Responses to this included a range of formats: first 3 digits of postcodes; whole postcodes; free text; and some respondents responded with "N/A".

Those that provided the first 4 digits of their postcode and therefore could be reasonably interpreted were used to create a visual representation of respondents and varying scales. A map of local respondents is shown in Section 4 of the Consultation Summary Report whilst a national map of respondents is shown in Figure 17-1.

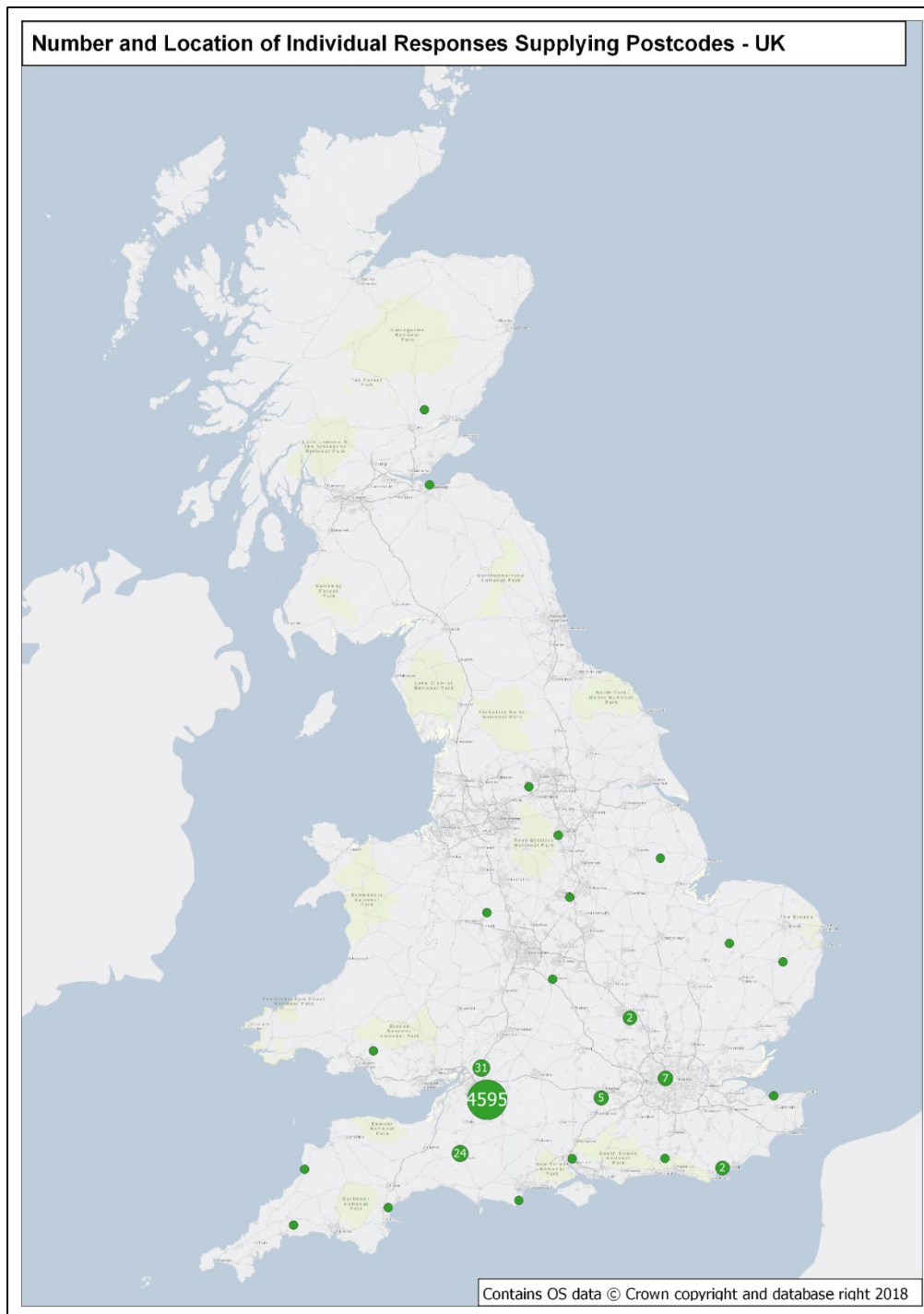


Figure 17-1: A map of survey respondents showing their home locations across the UK

Professional or Working Status

Table 17-5 summarises the responses provided to Question 19, *'What would best describe your professional or working status?'*

Table 17-5: Responses to Question 19

<i>What would best describe your professional or working status?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	6614	-
Total number of respondents that did not answer this question	994	-
Prefer not to say	307	5
Employed	3445	52
Self-employed	935	14
Retired	1710	26
Not in work	144	2
Student	73	1

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Age

Question 20 asked *'What was your age at your last birthday?'*

Question 20 was an open text question and therefore all 5956 responses were read and checked to ensure all were in the same format (numerical rather than written). Where an exact age couldn't be determined; either due to respondents providing multiple ages, an approximate age (i.e. 50+) or an unrelated comment, these were classified as anomalous. Ages under 11 and ages over 99 were also included as anomalous answers.

Table 17-6 displays the responses to Question 20 following the data cleaning and categorisation.

Table 17-6: Responses to Question 20

<i>What was your age at your last birthday?</i>	Number of Responses	Percentage (%)
Total number of respondents that answered this question	5956	-
Total number who skipped this question	1652	-
Under 20	29	0
20-29	403	7
30-39	866	15
40-49	1203	20
50-59	1313	22
60-69	1159	19
70-79	649	11
80-89	133	2
90-99	8	0
Anomalous	193	3

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Dependent Children

Question 21 asked respondents '*Do you have any dependent children?*'

Table 17-7 displays responses to Question 21.

Table 17-7: Responses to Question 21

<i>Do you have any dependent children?</i>	Number of Responses	Percentage (%)
Total number of respondents that answered this question	6546	-
Total number of respondents that did not answer this question	1062	-
Yes	2390	37
No	3745	57
Prefer not to say	411	6

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Disability

Question 22 asked '*Do you consider yourself to have a long-term condition that limits your day-to-day activities?*'

Table 17-8 displays the responses to this question.

Table 17-8: Responses to Question 22

<i>Do you consider yourself to have a long-term condition that limits your day-to-day activities?</i>	Number of Responses	Percentage (%)
Total number of respondents that answered this question	6565	-
Total number of respondents that did not answer this question	1043	-
Yes	851	13
No	5223	80
Prefer not to say	491	7

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Gender

Question 23 asked '*How do you define your gender?*'

Table 17-9 displays the responses to this question.

Table 17-9: Responses to Question 23

<i>How do you define your gender?</i>	Number of Responses	Percentage (%)
Total number of respondents that answered this question	6571	-
Total number of respondents that did not answer this question	1037	-
Male	3042	46
Female	2915	44
Prefer not to say	515	8
Other	99	2

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Driver Status

Question 15 asked '*Do you drive a vehicle?*'

Responses to Question 15 are summarised in Table 17-10.

Table 17-10: Responses to Question 15

<i>Do you drive a vehicle?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	6644	-
Total number who skipped this question	964	-
Yes	6204	93
No	378	6
Does not apply	62	1

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

Question 16 asked ‘*How often do you drive into or through the proposed zone in Bath?*’

Responses to Question 16 are displayed in Table 17-11.

Table 17-11: Responses to Question 16

<i>How often do you drive into or through the proposed zone in Bath?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	6633	-
Total number who skipped this question	975	-
Daily	1450	22
Several times a week	2467	37
Once a week	986	15
Less than once a week	1196	18
I don't drive into Bath	283	4
Does not apply	251	4

Note that percentages are calculated based on the number of people who responded to this question – not the total number of questionnaire respondents.

There were inconsistencies in the data provided by respondents. Some respondents who selected that they did not drive in Question 15 indicated in their response to Question 16 that they did drive. This data was therefore cross-tabulated to gain a better understanding of which data could be reliably interpreted.

Data provided in the Table 17-12 shows the cross-tabulation between Question 16 (*regularity of driving in the proposed zone*) and Question 15 (*Do you drive?*).

Table 17-12: Cross-tabulation of Question 15 and Question 16

<i>How often do you drive into or through the proposed zone in Bath?</i>	<i>Do you drive a vehicle?</i>				
	Yes	No	Does not apply	No Response	Total
Daily	1419	15	5	11	1450
Several times a week	2430	21	4	12	2467
Once a week	971	10	3	2	986
Less than once a week	1167	15	7	7	1196
I don't drive into Bath	172	98	10	3	283
Does not apply	22	198	29	2	251
No Response	23	21	4	927	975
Total	6204	378	62	964	7608

Minimum Emissions Standards and Proposed Exemptions

Question 4 asked: 'Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, please indicate whether your main vehicle would fall into any of the categories listed below and therefore not be charged'.

Respondents to Question 4 were able to select multiple options. 377 respondents selected multiple options, as such, the sum of responses (7051) in the second half of Table 17-13 is greater than the number of respondents that answered this question (6577).

Table 17-13: Responses to Question 4

<i>Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, please indicate whether your main vehicle would fall into any of the categories listed below and therefore not be charged</i>	Number of responses
Total number of respondents that answered this question	6577
Total number who skipped this question	1031
Euro 6 diesel vehicle registered from approx. 2015 (Minimum emission standards for the proposed zone - not charged)	722
Euro 4, 5 or 6 petrol vehicle registered from approx. 2006 (Minimum emission standards for the proposed zone - not charged)	2352
Fully electric and hydrogen fuel cell vehicle (Minimum emission standards for the proposed zone)	114
A vehicle within the historic vehicle tax class (Nationally exempt vehicles)	150
A vehicle within the disabled passenger tax class (Nationally exempt vehicles)	86
Motorcycle or moped (Proposed local exemptions - applying to Bath's proposed zone only)	159
A vehicle driven by a disabled driver (Proposed local exemptions - applying to Bath's proposed zone only)	160
None apply	3308
Total number of responses	7051

Data was cleaned to ensure:

- Respondents that selected multiple answers in Question 4 were only counted once;
- From Question 4, respondents that selected 'None Apply' and an option that suggested that they expected to drive a vehicle that would meet the minimum emissions standards for the proposed zone or a vehicle that would qualify for an exemption were removed. This removed 40 respondents; and
- Respondents that answered Question 4 with anything other than 'None Apply' and answered Question 15 with a 'No' or 'Does Not Apply' were removed from the dataset. This removed 43 respondents.

As such, a total of 83 respondents were removed from the dataset.

The data cleaning process is summarised in Figure 17-2.

Figure 17-2: Question 4 data cleaning process

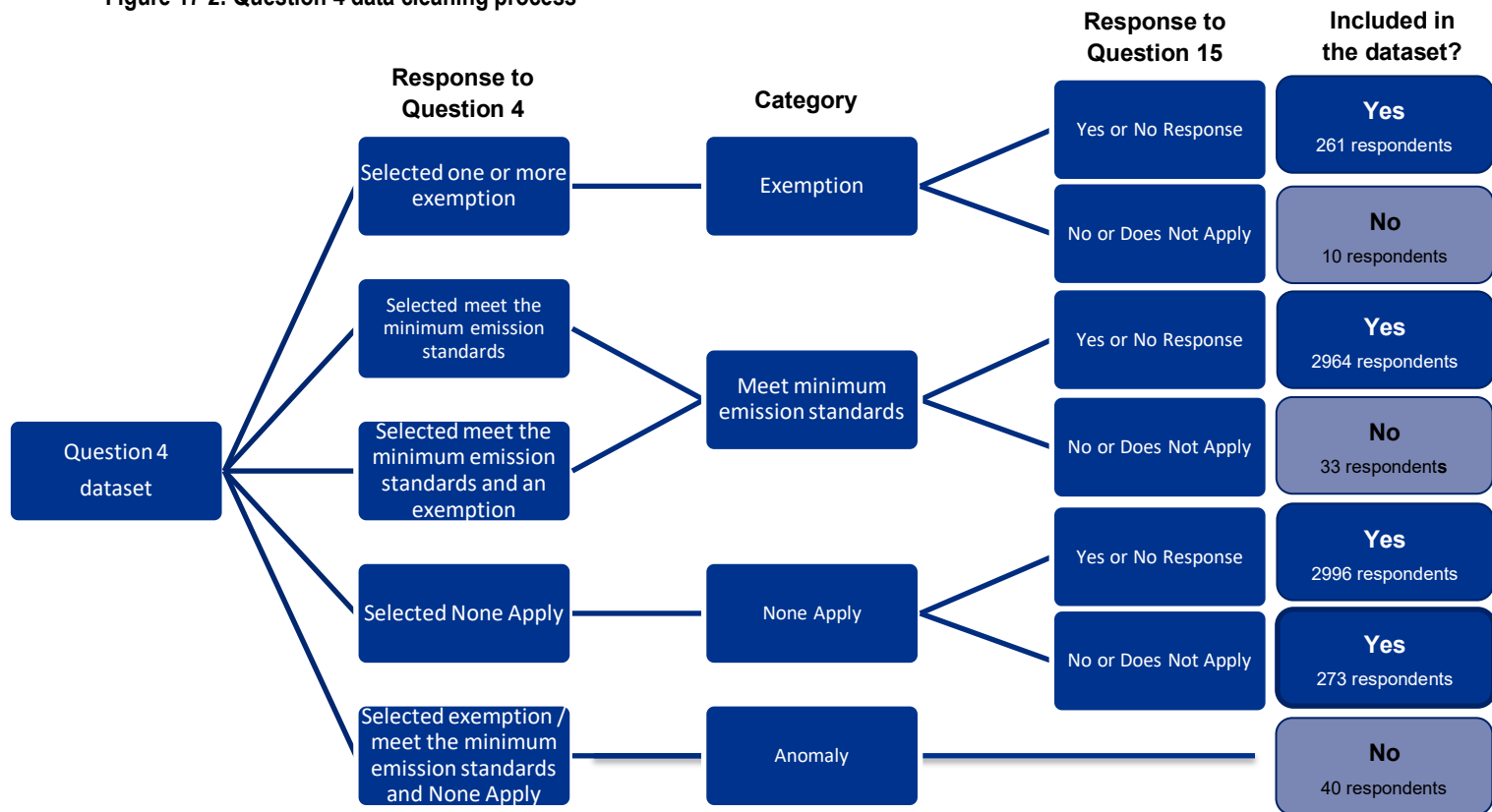


Table 17-14 shows the respondents anticipating to drive a vehicle in two years' time which either qualifies for a proposed exemption or complies with the minimum emission standards for the proposed zone, using data from Questions 4 and 15.

Table 17-14 Responses to Question 4 following data cleaning

<i>After data cleaning, respondents that anticipate driving a vehicle...</i>	Number of responses	Percentage (%)
Total number of respondents that answered Question 4	6577	-
Total number who skipped Question 4	1031	-
Total number removed following data cleaning	83	
Complying with the minimum emission standards for the proposed zone	2964	46
Qualifying for a proposed exemption	261	4
None apply	3269	50

Proposed Concessions

Question 5 asked: '*Thinking ahead to the proposed introduction of the Clean Air Zone in two years' time, are any of the following proposed local concessions likely to apply to you or your vehicle? If you don't drive, tick 'none apply'.*

As with Question 4, respondents were able to select multiple responses to Question 5. As such, the sum of responses (6330) in the second half of Table 17-15 is greater than the number of respondents that answered this question (6077).

Table 17-15 Responses to Question 5

<i>Thinking ahead to the proposed introduction of the Clean Air Zone in two years' time, are any of the following proposed local concessions likely to apply to you or your vehicle? If you don't drive, tick 'none apply'.</i>	Number of responses
Total number of respondents that answered this question	6077
Total number who skipped this question	1531
Euro 4/5 diesel vehicles being used by blue badge holders	317
Euro 4/5 diesel vehicles being used by registered healthcare providers	281
Euro 5 diesel hybrid vehicles	131
None apply	5601
Total number of responses	6330

Following the same approach as with Question 4, the data was cleaned so that respondents that ticked multiple answers were only counted once. Of the 6077 respondents that answered Question 5, there were 12 anomalies where respondents ticked both 'none apply' and an option that suggested that they expected to qualify for at least one of the proposed concessions. These anomalies are not included in this further analysis.

The data was then cleaned using the responses from Question 15 (*Do you drive a vehicle?*). Any respondent that answered Question 5 with anything other than 'None Apply' and answered Question 15 with a 'No' or 'Does Not Apply' was removed from the dataset, this resulted in 16 respondents being removed. Table 17-16 shows the outcome of this process.

Table 17-16: Responses to Question 5 following data cleaning

<i>After data cleaning, respondents that anticipate</i>	Number of respondents	Percentage (%)
Total number of respondents that answered Question 5	6077	-
Total number who skipped Question 5	1531	-
Total number removed following data cleaning	28	
To qualify for a proposed concession	460	8
None apply	5589	92

Identifying respondent drivers that would not be charged

Responses from Question 4 (exemptions), Question 5 (concessions) and Question 15 (do you drive) were combined and further analysed to determine whether respondents would incur the proposed charge. As above, any respondent that did not state in Question 15 that they drove a vehicle but answered Question 4 or 5 with anything other than 'None Apply' were removed from the dataset. Respondents that did not answer Question 15 remained in the dataset.

Cross-tabulation of the datasets summarised in Table 17-14 and Table 17-16 was used to determine whether respondents would have to pay the proposed charges. This process is summarised in Figure 17-3 and Table 17-17.

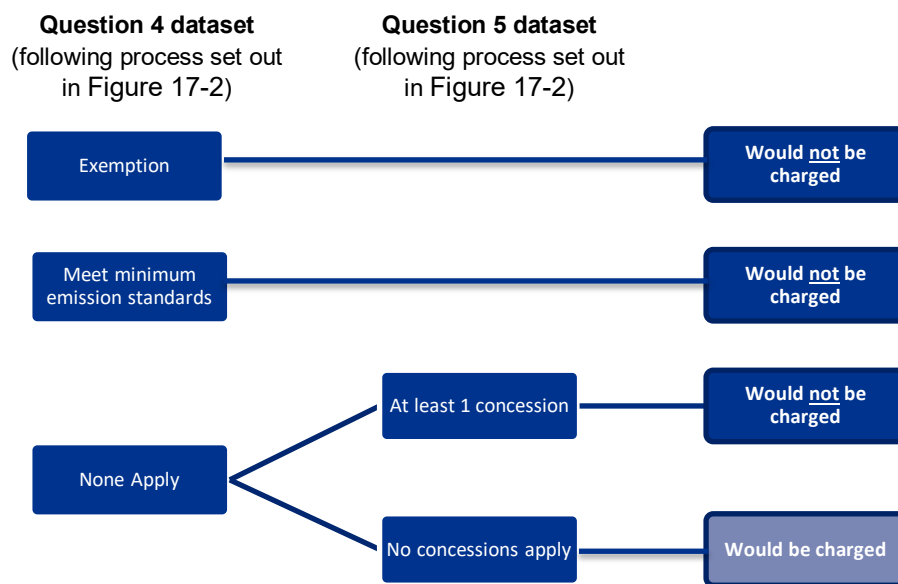


Figure 17-3: Question 4 and 5 data cleaning process

Table 17-17 Cross-tabulation of data provided in Questions 4 and 5

After data cleaning, respondents that.	Number of Respondents	Percentage (%)
Anomalies	51	-
Identified as non-drivers but stated they qualify for a concession or exemption or meet minimum emission standards	51	-
Selected 'None Apply' in Question 4 and skipped Question 5	388	-
Selected 'None Apply' in Question 5 and skipped Question 4	439	-
Skipped both questions	605	-
Would not be charged	3408	56
Do not qualify for a concession or exemption or meet minimum emission standards (includes non-drivers)	2666	44
Total	6074	-

Effectiveness of the proposed charges

Question 2 asked 'To what extent do you agree or disagree with the following statement: "The proposed charges will be effective in encouraging people to change to lower emissions vehicles or to use alternative means of transport to access the City"'

Responses to Question 2 are summarised in Table 17-18.

Table 17-18: Responses to Question 2

<i>Extent that the charge will be effective</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	7318	-
Total number who skipped this question	290	-
Agree strongly	934	13
Agree	1546	21
Neither agree nor disagree	740	10
Disagree	1356	19
Disagree strongly	2582	35
Don't know	160	2

Note that percentages are calculated based on the number of respondents that answered the question.

Further Analysis

Cross tabulation of the responses to Question 2 with data from other questions shows how respondent's views differ depending on location (Question 17); frequency of travel within the proposed zone (Question 16) and whether respondents expected to be charged in two years' time (Questions 4, 5 and 15).

Effectiveness of the proposed charges by home location

Table 17-19 shows the cross-tabulation of how a respondent felt about the effectiveness of the proposed charges (Question 2) compared to their location of residence (Question 17).

Table 17-19 Cross-tabulation between Question 2 and Question 17

<i>Extent respondents agree with the effectiveness of the charge</i>	<i>Home location of respondents</i>					
	In the zone	In Bath but outside of the zone	In B&NES but not in Bath	Outside of B&NES	Prefer not to say	No Response
Agree Strongly	93	531	105	97	17	91
Agree	132	860	212	150	16	176
Neither Agree nor Disagree	66	374	95	117	9	79
Disagree	81	617	232	210	31	185
Disagree Strongly	161	1069	501	391	106	354
Don't Know	8	91	16	23	5	17
No Response	12	47	18	18	6	189

Effectiveness of the proposed charges by frequency of travel into the proposed zone

Table 17-20 shows the cross-tabulation of how a respondent felt about the effectiveness of the proposed charges (Question 2) compared to their frequency of travel into the proposed zone (Question 16).

Table 17-20 Cross-tabulation between Question 2 and Question 16

<i>Extent respondents agree with the effectiveness of the charge</i>	<i>Frequency of travel into the proposed zone</i>						
	Daily	Several times a week	Once a week	Less than once a week	I don't drive into Bath	Does not apply	No Response
Agree strongly	123	307	124	179	70	52	79
Agree	211	506	234	280	90	68	157
Neither agree nor disagree	120	249	119	114	26	35	77
Disagree	264	458	181	235	32	30	156
Disagree strongly	684	853	303	341	49	47	305
Don't know	26	48	13	32	8	14	19
No Response	22	46	12	15	8	5	182

Effectiveness of the proposed charges by likeliness to incur the proposed charges

Table 17-21 shows the cross-tabulation of how a respondent felt about the effectiveness of the proposed charges (Question 2) compared to whether they expect to incur the charge (based on data from Questions 4, 5 and 15).

Table 17-21 Cross-tabulation between Question 2 and respondents likely to incur the charge

Extent respondents agree with the effectiveness of the charge	Likeliness to incur the proposed charge	
	Respondent drivers that would <u>not</u> be charged	Respondent drivers that would be charged
Agree strongly	522	322
Agree	779	570
Neither agree nor disagree	319	320
Disagree	618	589
Disagree strongly	904	1361
Don't know	66	73
No Response	60	34
Total	3268	3269

Concessions and Exemptions

Question 6 asked respondents to rank their top 4 proposed concessions for those offered until 2022 and then those offered until 2025.

Responses to Question 6 are shown in Table 17-22 and Table 17-23.

Table 17-22: Responses to Question 6 – Proposed concessions until 2022

Proposed concessions up to 2022	Ranking of proposed concessions					
	1 Most Important	2	3	4 Least Important	Total	Not Ranked
Total number of respondents that answered this question	4968					
Total number who skipped this question	2640					
Euro 4/5 diesel vehicles being used by blue badge holders	637	767	696	748	2848	4760
Euro 4/5 diesel vehicles being used by registered healthcare providers	549	1433	900	359	3288	4367
Euro 4/5 diesel vehicles being used by registered community transport providers	186	538	1002	750	2476	5132
Euro 4/5 diesel accessible taxi and private hire vehicles	89	162	219	446	916	6692
Euro 5 diesel hybrid vehicles	69	106	138	172	485	7123
Euro 5 diesel taxi and private hire vehicles	56	152	175	197	580	7028

Table 17-23: Responses to Question 6 – Proposed concessions until 2025

<i>Proposed concessions up to 2025</i>	<i>Ranking of proposed concessions</i>					
	1 Most Important	2	3	4 Least Important	Total	Not Ranked
Total number of respondents that answered this question	4968					
Total number who skipped this question	2640					
Recovery vehicles or breakdown trucks over 3,500 kg	71	322	244	272	909	6699
Emergency service vehicles	2736	344	248	495	3823	3785
Vehicles in the Special Vehicles tax class	28	43	66	53	190	7418
Vehicles in the Special Types tax class	29	51	64	60	204	7404
Vehicles in the General Haulage Vehicle tax class	75	108	117	193	493	7115
Euro 4/5 diesel coaches with valid educational trip permits	147	188	234	476	1045	6563

Travel Behaviour

Question 8 asked 'If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020?'

Table 17-24 shows the responses to Question 8.

Table 17-24: Responses to Question 8

<i>If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	4872	64
Total number who skipped this question	2736	36
Minimise driving through the zone and pay the charge	563	12
Drive in the zone as normal and pay the charge	206	4
Change to a compliant vehicle	361	7
Change the way I typically travel (switch to walking, cycling or public transport)	282	6
Not sure	528	11
Other	2932	60

Note that percentages are calculated based on the number of respondents to this question.

Further Analysis

Table 17-25 cross-tabulates data provided in Question 8 with the data provided in Question 15 (*do you drive?*) and Questions 4 and 5 (*minimum emission standards, exemptions and concessions*) to remove respondents who would not incur the proposed charge and respondents that stated they do not drive.

Table 17-25: Responses to Question 8 following data cleaning

<i>If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	4872	64.0
Total number who skipped this question	2736	36.0
Minimise driving through the zone and pay the charge	341	11
Drive in the zone as normal and pay the charge	114	4
Change to a compliant vehicle	224	7
Change the way I typically travel (switch to walking, cycling or public transport)	129	4
Not sure	308	10
Other	1950	64

Note that percentages are calculated based on the number of respondents to this question.

Data from Table 17-25 was used to determine if respondent's travel behaviour was influenced by their home location (Question 17), frequency of travel within the proposed zone (Question 16) and whether they expect to be charged in two years' time. This further analysis did not show any significant correlations.

Behavioural response to the proposed charges by home location

Table 17-26: Cross tabulation between Question 8 and Question 17

<i>If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020</i>	<i>Home location of respondents</i>					
	In the zone	In Bath but outside of the zone	In B&NES but not in Bath	Outside of B&NES	Prefer not to say	No Response
Minimise driving through the zone and pay the charge	37	263	82	65	11	72
Change to a compliant vehicle	19	170	49	40	7	54
Drive in the zone as normal and pay the charge	15	99	21	29	3	32
Change the way I typically travel (switch to walking, cycling or public transport)	9	109	50	39	6	51
Not sure	30	236	80	67	13	77

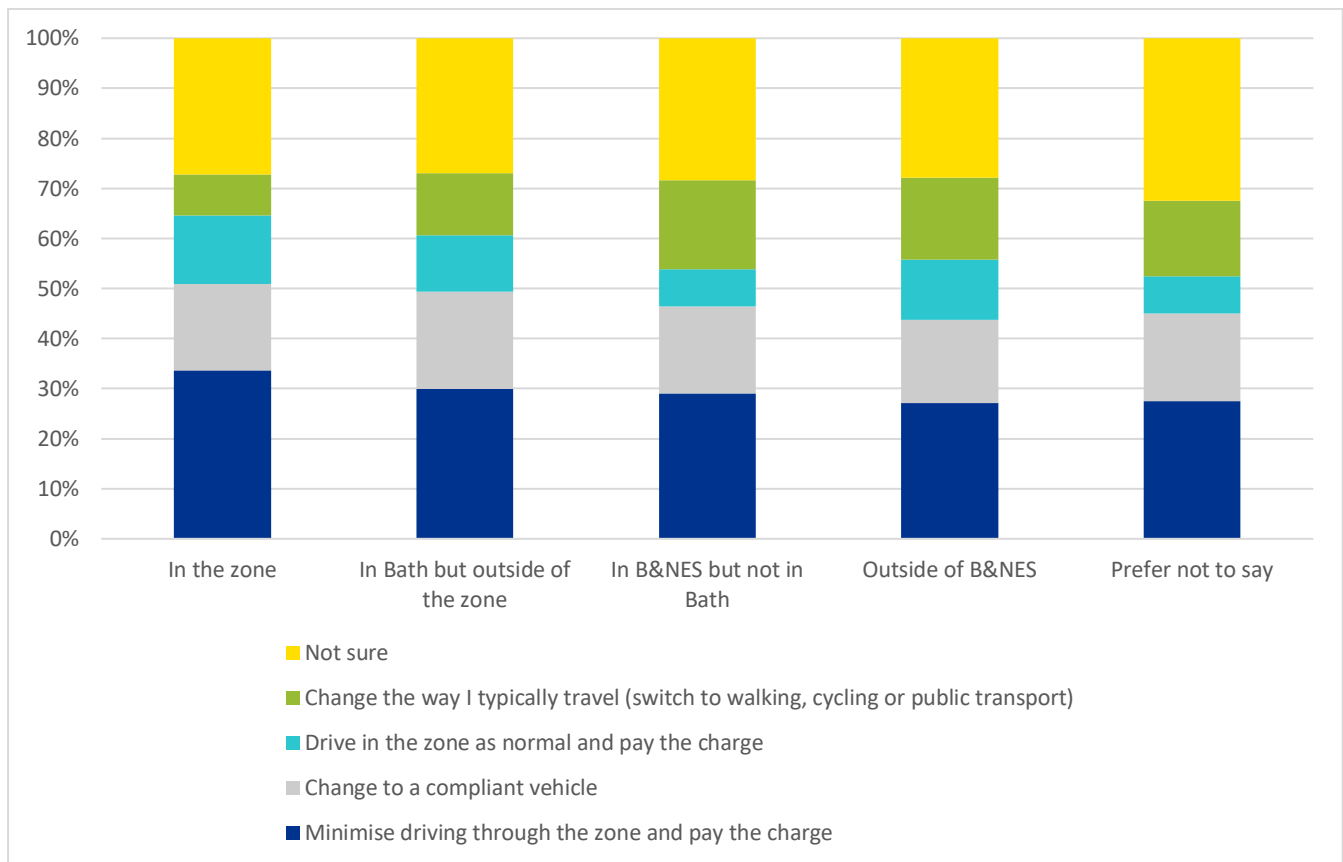


Figure 17-4: Cross tabulation between Question 8 and Question 17 – view on behaviour change, against home location

Behavioural response to the proposed charge by frequency of travel into the proposed zone

Table 17-27: Cross tabulation between Question 8 and Question 16

If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020	Frequency of travel into the proposed zone						
	Daily	Several times a week	Once a week	Less than once a week	I don't drive into Bath	Does not apply	No Response
Minimise driving through the zone and pay the charge	121	174	75	80	13	2	65
Change to a compliant vehicle	59	114	45	67	4	1	49
Drive in the zone as normal and pay the charge	43	59	32	26	7	2	30
Change the way I typically travel (switch to walking, cycling or public transport)	53	77	38	47	4	0	45
Not sure	107	160	69	85	16	2	64

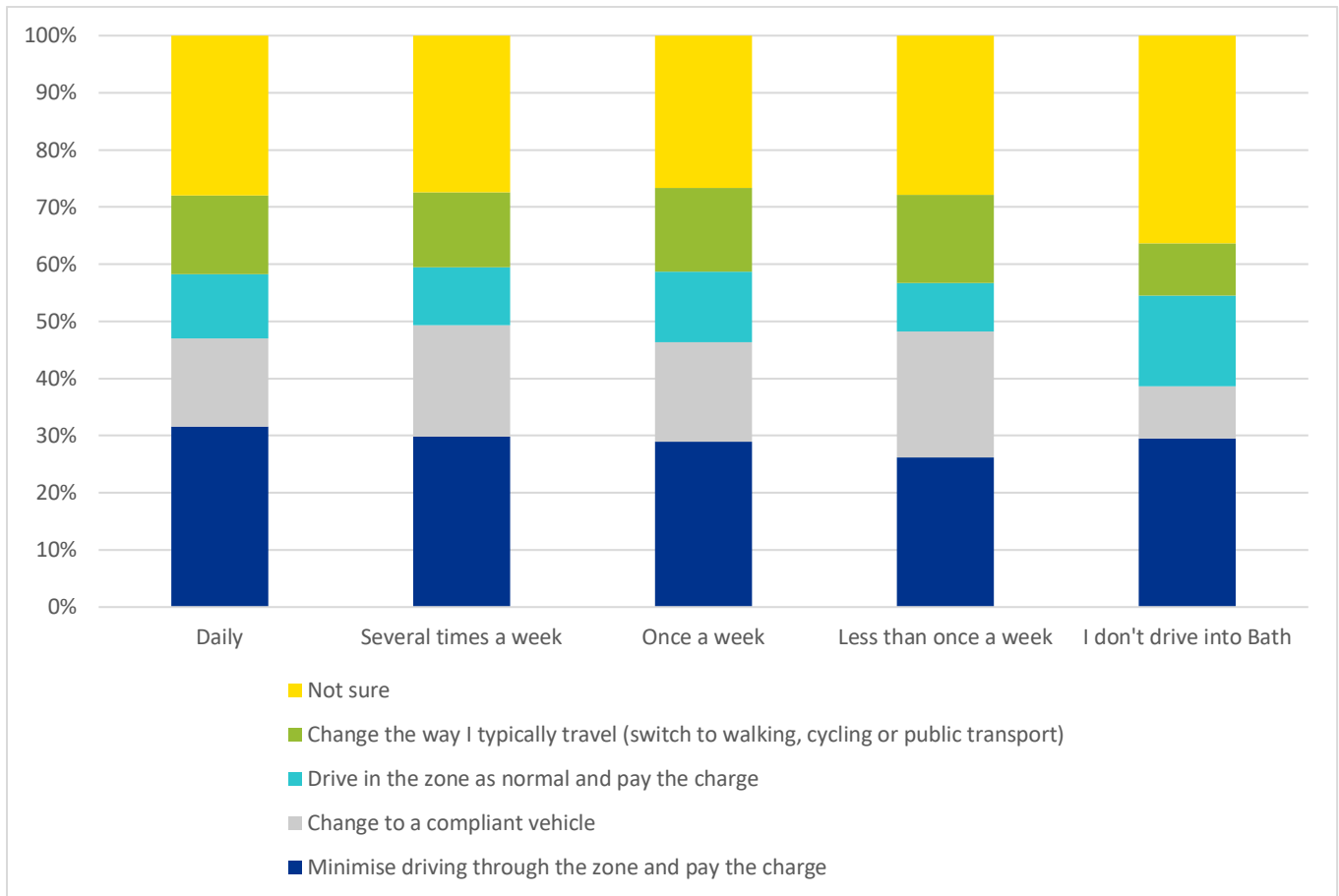


Figure 17-5: Cross tabulation between Question 8 and Question 16 - view on behaviour change, frequency of travel into the proposed zone

Behavioural response to the proposed charge by likelihood to incur the proposed charge

Table 17-28: Cross tabulation between Question 8 and Questions 4,5 and 15.

If you drive a non-compliant vehicle what do you think you will do if the zone is introduced in late 2020	Likelihood to incur the proposed charge	
	Vehicle would <u>not</u> be charged	Vehicle would be charged
Minimise driving through the zone and pay the charge	171	268
Change to a compliant vehicle	95	178
Drive in the zone as normal and pay the charge	73	85
Change the way I typically travel (switch to walking, cycling or public transport)	89	117
Not sure	171	247

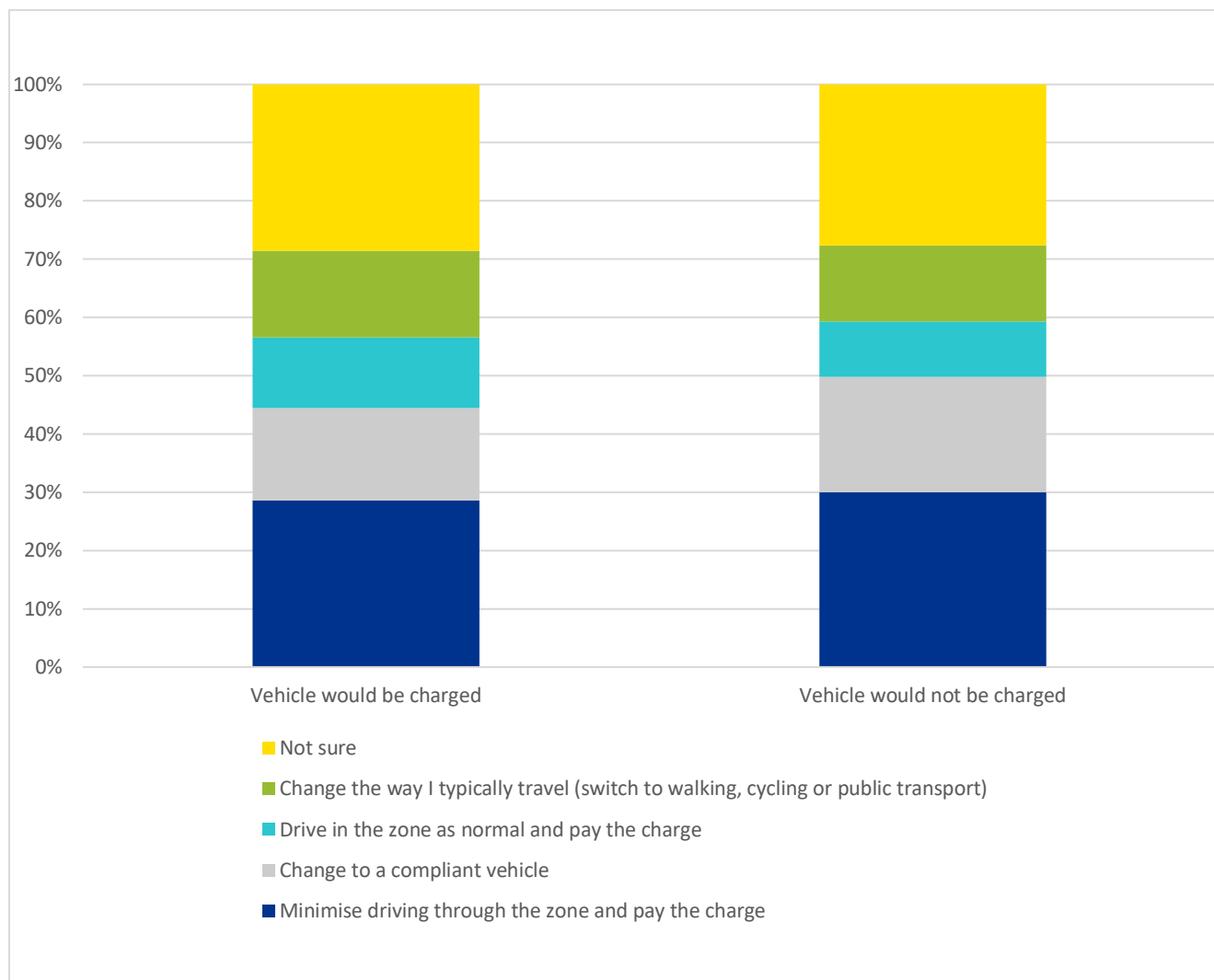


Figure 17-6: Cross tabulation between Question 8 and Questions 4, 5 and 15 - view on behaviour change, against likelihood to incur the charge

Supporting Measures

Question 9 of the Questionnaire for Individuals and Groups asked 'We're considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for you, your family or the people you represent?'

Table 17-29: Responses to Question 9

Supporting measures to be delivered from 2020	Ranking of proposed supporting measures					
	1 (Most Important)	2	3	4 (Least Important)	Total	Not ranked
Total number of respondents that answered this question	6175					
Total number who skipped this question	1433					
Retrofitting high-emission buses with cleaner engines	1706	891	744	731	4072	3536
Anti-idling enforcement – to encourage vehicles to switch engines off when stationary	427	660	606	561	2254	5354
Additional and improved cycle parking	346	404	428	433	1611	5997
Reducing the cost of parking permits for ultra-low emission vehicles such as fully electric cars	117	258	295	327	997	6611
More electric vehicle charging points	329	384	540	455	1708	5900
Extended opening hours at the park and ride	841	793	728	572	2934	4674
Overnight secure parking at the park and ride	183	502	478	454	1617	5991
Walk/scoot/cycle-to-school initiatives	443	444	495	466	1848	5760
Financial support for residents and local businesses that need it most to upgrade from non-compliant cars	1401	574	546	621	3142	4466
Financial support for local businesses to upgrade from non-compliant commercial vehicles	207	616	462	614	1899	5709

Note that percentages are calculated based on the number of people who responded to this question – not the total number of respondents.

Question 10 asked 'We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for you, your family or the group you represent? Please identify your top 3, ranked from 1 to 3 where 1 is most important.'

Table 17-30: Responses to Question 10

Supporting measures to be delivered from 2020	Ranking of proposed supporting measures				
	1 Most Important	2	3 Least Important	Total	Not Ranked
Total number of respondents that answered this question	6054				
Total number who skipped this question	1554				
Additional improvements to walking and cycling routes	1343	1044	1030	3417	4191
Introduction of electric cycle hire in the city	186	537	775	1498	6110
Expansion of low-emission car and van clubs in the city	143	289	578	1010	6598
Public transport improvements on key routes into the city and within the zone	3203	1351	678	5232	2376
Smaller park & ride sites along existing bus routes	680	1595	978	3253	4355
Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles	346	504	917	1767	5841

C.2 Questionnaire for Businesses

Response Rate

Table 17-31 shows the response rate to the questionnaire for businesses. In total 567 responses were received.

Table 17-31: Overall response rate to the questionnaire for businesses

Question Number	Question type	Business Respondents answering the question		Business Respondents that skipped the question	
		Number	Percentage of Respondents	Number	Percentage of Respondents
1 – Boundary	Free text	375	66%	192	34%
2 - Charge	Closed question	550	97%	17	3%
3 - Charge	Free text	469	83%	98	17%
4 – Vehicle use	Closed question	502	89%	65	11%
5 – Vehicle fleet	Closed question	376	66%	191	34%
6 – Vehicle compliance	Closed question	328	58%	239	42%
7 – Further info	Free text	208	37%	359	63%
8 - Concession	Closed question	250	44%	317	56%
9 - Concession	Closed question	198	35%	369	65%
10 - Concession	Free text	319	56%	248	44%
11 – Travel behaviour	Closed question	372	66%	195	34%
12 – Supporting measures	Closed question	357	63%	210	37%
13 - Supporting measures	Closed question	281	50%	286	50%
14 - Supporting measures	Free text	227	40%	340	60%
15 - Steps to reduce pollution	Free text	220	39%	347	61%
16 - Impact	Free text	346	61%	221	39%
17 – Further comments	Free text	312	55%	255	45%
18 – Business Type	Closed question	406	72%	161	28%
19 – Business name	Free text	332	59%	235	41%
20 – Authorised to respond on behalf of business	Closed question	382	67%	185	33%
21 – Drive through Zone	Closed question	397	70%	170	30%

22 – Business location	Closed question	384	68%	183	32%
23 - Postcode	Free text	371	65%	196	35%
24 – Number of Employees	Free text	365	64%	202	36%

Respondent Type

Business Type

Question 18 asked respondents to ‘Specify the type of business you are responding on behalf of’.

Table 17-32 shows the types of businesses that responded to the Questionnaire for Businesses and Organisations.

Table 17-32: Responses to Question 18

<i>Specify the type of business you are responding on behalf of</i>	Number of Responses	Percentage (%)
Total number of respondents that answered this question	406	-
Total number of respondents that did not answer this question	161	-
Independent Retailer	62	15
National or Multinational Retailer	2	0
SME	36	9
Hotel/B&B	14	3
Restaurant/Bar	4	1
Transport Operator	17	4
Educational Institution	19	5
Freight or Distribution Company	2	0
Health Organisation	13	3
Self Employed	111	27
Other	126	31

Note that percentages are calculated based on the number of people who responded to this question.

Business Name

Question 19 asked *'What is the name of your business or organisation?'*

289 business respondents provided an answer that could be interpreted as the name of a business or organisation. These are not reported for confidentiality reasons.

Question 20 asked *'Are you authorised to respond on behalf of this business or organisation?'*

Table 17-33 shows the responses to Question 20. It should be noted that respondents were only able to select "Yes" or not respond to this question.

Table 17-33: Responses to Question 20

<i>Are you authorised to respond on behalf of this business or organisation?</i>	Number of Responses
Total number of respondents that answered this question	382
Total number of respondents that did not answer this question	185
Yes	382

Business Location

Question 22 asked *'Where is your business or organisation located?'*

Table 17-34 shows the responses to Question 22.

Table 17-34 Responses to Question 22

<i>Where is your business or organisation located?</i>	Number of responses	Percentage (%) of respondents that answered the question
Total number of respondents that answered this question	384	-
Total number who skipped this question	183	-
Prefer not to say	26	7
In the zone (see map)	132	34
In Bath but outside of the zone	141	37
In B&NES but not in Bath (please state where below)	57	15
Outside of B&NES (please state where below)	28	7
Other (please State)	182	47

Question 23 asked respondents to provide the first 4 digits of their postcodes. Responses to this question included a range of formats: first 3 digits of postcodes; whole postcodes; multiple postcodes; and some respondents responded with "N/A". In total, 371 respondents provided data in response to this question.

Those that provided the first 4 digits of their postcode and therefore could be reasonably interpreted were used to create a visual representation of respondents and varying scales. A map of local business respondents is shown in Section 5 of the Consultation Summary Report whilst a regional map of respondents is shown in Figure 17-7.

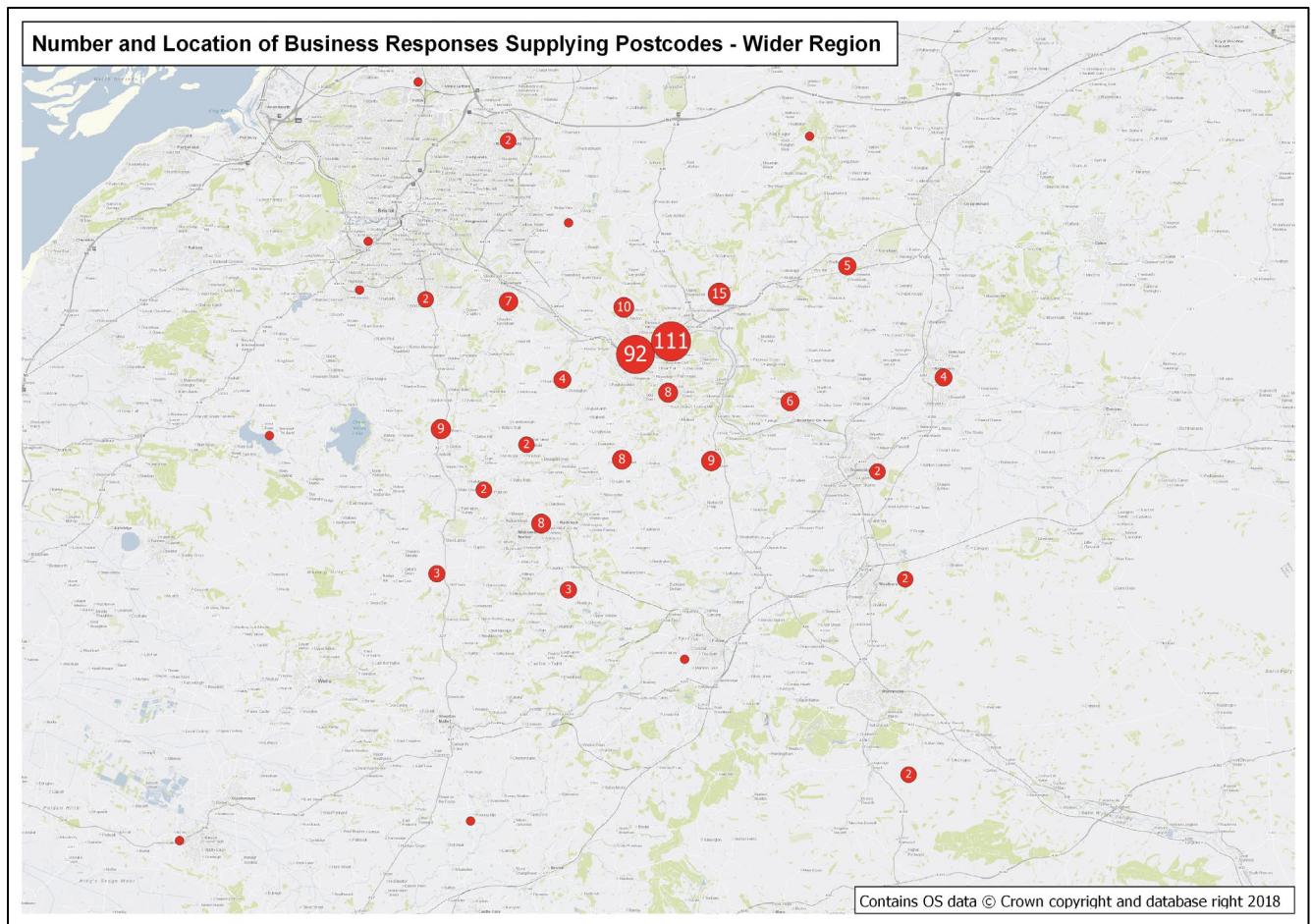


Figure 17-7 Business respondent location – Wider Region

Business Employees

Question 24 asked “*How many people does your business employ*”.

Responses to Question 24 were open text and therefore required further analysis to format the responses consistently. Respondents that answered the question with a response that could not be quantified (e.g. specify that they do not employ staff but use suppliers / deliveries / tradesmen or their number of staff varies) were categorised as “Anomalies”.

For completeness, responses were cross analysed with the business type (Question 18). This analysis highlighted some respondents that stated in Question 18 that they were self-employed, or a trader stated they employed 0 staff in Question 24. These responses have been categorised as 1 to include the respondent. This data shows that many respondents were from small organisations with less than 10 employees.

Table 17-35 Responses to Question 24

<i>How many people does your business employ?</i>	Number of responses	Percentage (%) of respondents that answered the question
Total number of respondents that answered this question	365	-
Total number who skipped this question	202	-
0	2	1
1 - 3	191	52
4 - 6	46	13
7 - 10	24	7
11 - 20	33	9
21 - 30	16	4
Over 30	40	11
Anomalies	12	3

Vehicle Operation

Question 4 asks 'Does your business or organisation own or operate vehicles that travel into or through the proposed zone in Bath?'

Table 17-36 summarises responses to Question 4.

Table 17-36 Responses to Question 4

<i>Does your business or organisation own or operate vehicles that travel into or through the proposed zone in Bath?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	502	-
Total number who skipped this question	65	-
Yes	359	72
No	143	28

Question 21 asks 'How often do your vehicles drive into or through the proposed zone in Bath?'

Table 17-37 summarises responses to Question 21.

Table 17-37 Responses to Question 21

<i>How often do your vehicles drive into or through the proposed zone in Bath?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	397	-
Total number who skipped this question	170	-
Daily	193	49
Several times a week	128	32
Once a week	26	7
Less than once a week	26	7
I don't drive into Bath	8	2
Does not apply	16	4

Fleet Data

Question 5 asked 'How many vehicles do you own or operate and what type of vehicles are they?'

376 respondents provided information for at least one vehicle type (although not all could be quantified). Responses to Question 5 were open text and therefore required analysis and categorisation to ensure that all responses were in a comparable format. Data received to Question 5 was categorised into one of four categories:

- Quantifiable response: responses which could be reasonably quantified and were greater than 0;
- No vehicles: responses which stated "0"
- No response: responses which stated "NA" or where respondents left blank; and
- Anomalous: responses which could not be reasonably quantified e.g. "many" or "it varies".

Table 17-38 summarises the number of responses received to Question 5 following their categorisation. Given that respondents could provide information for all vehicle types, the number of responses is greater than the number of respondents.

Table 17-38 Responses to Question 5

<i>How many vehicles do you own or operate and what type of vehicles are they?</i>	Quantifiable responses	No Vehicles	N/A	Anomalous
Total number of respondents that answered this question	376			
Total number who skipped this question	191			
Total number of respondents that provided quantifiable responses for at least 1 vehicle type	372			
Car	266 (72%)	3	295	3
LGV/Van	168 (45%)	12	387	0
HGV	21 (6%)	17	529	0
Taxi/Private hire vehicle	16 (4%)	18	533	0
Motorbike/moped	20 (5%)	18	529	0
Bus	8 (2%)	21	538	0
Coach	5 (1%)	21	541	0
Other	17 (5%)	16	530	4

Note that percentages are based on the total number of respondents that provided quantifiable responses for at least 1 vehicle type (372), not number of responses.

Of the quantifiable responses provided in Question 5, Table 17-39 shows the number of responses by fleet size.

Table 17-39 Quantifiable Responses to Question 5

How many vehicles do you own or operate and what type of vehicles are they?	Number of vehicles in a fleet (Count of responses)				Number of vehicles in a fleet Percentage of vehicle type (%)			
	1-5	6-10	11-50	Over 50	1-5	6-10	11-50	Over 50
Car	248	9	8	1	93	3	3	0
LGV/Van	156	6	4	2	93	4	2	1
HGV	13	3	3	2	62	14	14	10
Taxi/Private hire vehicle	16	0	0	0	100	0	0	0
Motorbike/moped	20	0	0	0	100	0	0	0
Bus	6	0	2	0	75	0	25	0
Coach	2	1	1	1	40	20	20	20
Other	15	2	0	0	88	12	0	0

Note that percentages are calculated based on the number of quantifiable responses for at least 1 vehicle type (372), not number of responses.

Further analysis was undertaken to establish respondents' total fleet size (all vehicle types combined). Table 17-40 shows the total fleet size by respondents.

The figures in Table 17-39 and Table 17-40 vary as the prior is based on quantifiable **responses**, whereas the latter is based on number of **respondents** providing quantifiable data (372).

Table 17-40 Respondents fleet size based on data from Question 5

How many vehicles do you own or operate and what type of vehicles are they?	Number of respondents by fleet size				Percentage of respondents by fleet size (%)			
	1-5	6-10	11-50	Over 50	1-5	6-10	11-50	Over 50
Respondents' total fleet size	316	30	20	6	85	8	5	2

Note that percentages are calculated based on the number of respondents providing quantifiable data for at least 1 vehicle type (372), not number of responses.

Question 6 asked '*Thinking ahead to the proposed introduction of a Clean Air Zone in two years' time, to the best of your knowledge, please indicate (or estimate) how many of the vehicles you told us about in Question 5 would fall into the categories listed above and therefore would not be charged?*'

328 respondents provided information for at least one vehicle type (although not all could be quantified). As with Question 5, responses to Question 6 were open text and therefore required analysis and categorisation. Question 6 responses were categorised into one of four categories:

- Quantifiable response: responses which could be reasonably quantified and were greater than 0;
- No vehicles: responses which stated "0"
- No response: responses which stated "NA" or where respondents left blank; and
- Anomalous: responses which could not be reasonably quantified e.g. "many" or "it varies".

Table 17-41 summarises the number of responses received to Question 6 following their categorisation. Given that respondents could provide information for all vehicle types, the number of responses is greater than the number of respondents.

Of the 320 respondents provided quantifiable data for Question 6, 63% (206) stated they expected to have at least 1 compliant vehicle.

Numbers in the column titled “*Quantifiable response greater than 1*” shows the number of respondents per vehicle type which anticipate having at least 1 compliant vehicle in two years’ time.

Table 17-41 Responses to Question 6

<i>How many vehicles do you anticipate being compliant in 2 years’ time?</i>	Quantifiable responses greater than 1	No Vehicles	No Response	Anomalous
Total number of respondents that answered this question	328			
Total number who skipped this question	239			
Total number of respondents that provided quantifiable responses (0 or greater)	320			
Total number of respondents that provided quantifiable responses for at least 1 vehicle type	206			
Car	136 (43%)	89	338	4
LGV/Van	87 (27%)	62	418	0
HGV	13 (4%)	16	538	0
Taxi/Private hire vehicle	9 (3%)	18	538	2
Motorbike/moped	13 (4%)	17	537	0
Bus	3 (1%)	18	546	0
Coach	4 (1%)	17	546	0
Other	7 (2%)	16	541	3

Note that percentages are based on the total number of respondents that provided quantifiable responses which includes 0 (320), not number of responses.

Further analysis of the dataset provided in Question 6 was undertaken to quantify the data provided. Data that could not be quantified has not been included within the dataset. Table C 41 shows the number of businesses who anticipate having vehicles which are compliant vehicles anticipated as being compliant in two years’ time; based on the size of fleet and vehicle category.

Table 17-42 Quantifiable responses to Question 6

In two years time how many vehicles would not be charged?	Size of fleet respondents anticipate being compliant in 2 years' time				
	0	1-5	6-10	11-50	Greater than 50
Car	89	123	7	5	1
LGV/Van	62	79	3	4	1
HGV	16	9	0	3	1
Taxi/Private hire vehicle	18	8	0	1	0
Motorbike/moped	17	13	0	0	0
Bus	18	2	0	1	0
Coach	17	2	2	0	0
Other	16	7	0	0	0

Further analysis was undertaken to establish the number of respondents that anticipated to drive compliant vehicles of any type. The figures in Further analysis of the dataset provided in Question 6 was undertaken to quantify the data provided. Data that could not be quantified has not been included within the dataset. Table C 41 shows the number of businesses who anticipate having vehicles which are compliant vehicles anticipated as being compliant in two years' time; based on the size of fleet and vehicle category.

Table 17-42 and Table 17-43 vary as the prior is based on quantifiable **responses**, whereas the latter is based on number of **respondents** (328). In total, 63% (206) of respondents to Question 6 anticipated owning at least 1 compliant vehicle.

Table 17-43 Respondents compliant fleet size based on data from Question 6

In two years' time how many vehicles would not be charged?	Number of respondents by fleet size				Percentage of respondents by fleet size (%)			
	1-5	6-10	11-50	Over 50	1-5	6-10	11-50	Over 50
Respondents' total fleet size	176	16	9	5	54	5	3	2

Note that due to rounding the sum of the percentages indicates 64% of respondents anticipate owning at least 1 compliant vehicle

Cross tabulation between data provided in Question 5 and Question 6 has been undertaken to understand the percentage of fleet anticipated to be compliant in 2 years' time.

Of the 372 respondents providing quantifiable data in Question 5, 318 also provided data that could be reasonably analysed in Question 6 (i.e. stated a number, including "0"). Other respondents, either did not answer the question or did not provide quantifiable data, were removed from the dataset. This process is shown in Figure 17-8.

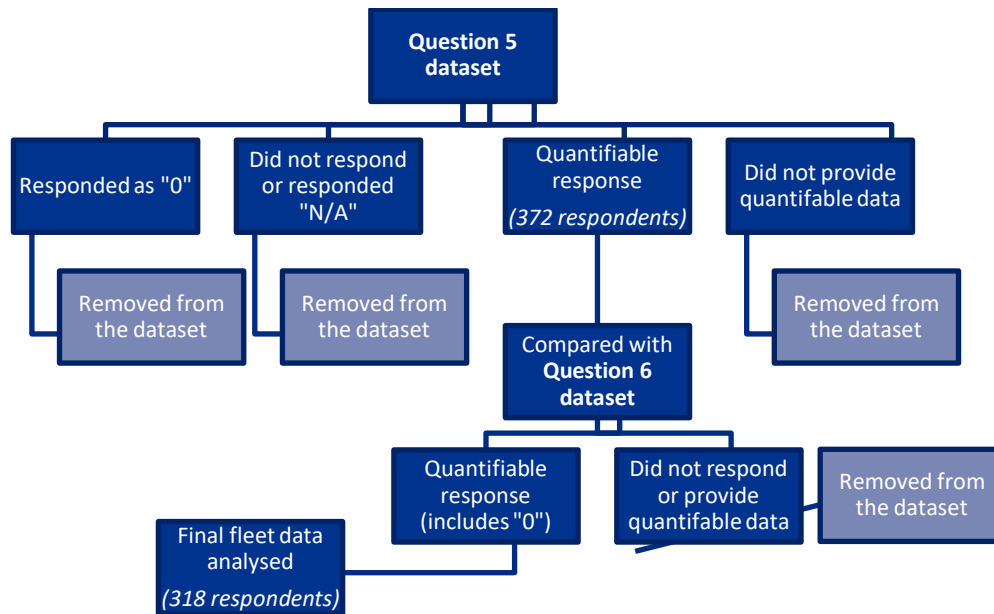


Figure 17-8: Process for establishing fleet compliance based on datasets from Questions 5 and 6

Table 17-44 shows the cross-tabulation datasets from Questions 5 and 6 by fleet size. i.e. the number of respondents (businesses) with a given fleet size and whether it is compliant.

Table 17-44 Count of compliant fleet by fleet size

<i>Percentage of fleet anticipated as being compliant</i>	Fleet less than 5	Fleet between 6 and 10	Fleet between 11 and 50	Fleet greater than 50
0%	105	6	2	0
1 – 49%	10	9	8	2
50 – 99%	42	9	9	4
Over 100%	107	4	1	0

Table 17-45 shows the percentage of 318 respondents anticipated as being compliant based on fleet size.

Table 17-45 Percentage of compliant fleet by fleet size

<i>Percentage of fleet anticipated as being compliant</i>	Fleet less than 5	Fleet between 6 and 10	Fleet between 11 and 50	Fleet greater than 50
0%	33%	2%	1%	0%
1 – 49%	3%	3%	3%	1%
50 – 99%	13%	3%	3%	1%
Over 100%	34%	1%	0%	0%

Effectiveness of the proposed charges

Question 2 of the business questionnaire asked 'To what extent do you agree or disagree with the following statement: "The proposed charges will be effective in encouraging businesses and organisations to change to lower emissions vehicles or change the way they operate in the city"

Responses to Question 2 are shown in Table 17-46.

Table 17-46 Responses to Question 2

<i>Extent the charges will be effective</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	550	-
Total number who skipped this question	17	-
Agree strongly	47	9
Agree	78	14
Neither agree nor disagree	61	11
Disagree	11	20
Disagree strongly	236	43
Don't know	17	3

Note that percentages are calculated based on the number of respondents that answered the question.

Further Analysis

Cross tabulation of the responses to Question 2 with data from other questions shows how respondent's views differ depending on location (Question 22) and frequency of travel within the proposed zone (Question 21).

Effectiveness of the proposed charges by location of business

Table 17-47 shows the cross-tabulation of how a respondent felt about the effectiveness of the proposed charge (Question 2) compared to the location of their business (Question 22).

Table 17-47 Cross-tabulation between data from Question 2 and 22

<i>Extent respondents agree with the effectiveness of the charge</i>	<i>Business location of respondents</i>					
	In the zone	In Bath but outside of the zone	In B&NES but not in Bath	Outside of B&NES	Prefer not to say	No Response
Agree Strongly	11	12	4	1	2	17
Agree	17	21	8	3	1	28
Neither Agree nor Disagree	14	16	3	6	6	16
Disagree	16	30	11	7	4	43
Disagree Strongly	67	59	30	8	13	59
Don't Know	4	2	1	2	0	8
No Response	3	1	0	1	0	12

Effectiveness of the proposed charges by frequency of travel into the proposed zone

Table 17-48 shows the cross-tabulation of how a respondent felt about the effectiveness of the proposed charge (Question 2) compared to their frequency of travel into the proposed zone (Question 21).

Table 17-48 Cross-tabulation between Question 2 and Question 21

Extent respondents agree with the effectiveness of the charge	Frequency of travel into the proposed zone						
	Daily	Several times a week	Once a week	Less than once a week	I don't drive into Bath	Does not apply	No Response
Agree strongly	14	11	1	2	0	1	18
Agree	27	14	6	3	1	2	25
Neither agree nor disagree	19	12	5	5	2	1	17
Disagree	33	27	4	3	1	6	37
Disagree strongly	94	62	9	10	3	4	54
Don't know	3	1	1	3	1	1	7
No Response	3	1	0	0	0	1	12

Concessions and Exemptions

Question 8 asked respondents, 'thinking ahead to the proposed introduction of the Clean Air Zone in two years' time, are any of the following proposed local concessions likely to apply to the vehicles owned or operated by your business or organisation?'

Respondents were able to select multiple options in Question 8 as such the number of responses (282) is greater than the number of respondents (250). Responses to Question 8 are shown in Table 17-49.

Table 17-49 Responses to Question 8

Are any of the following proposed local concessions likely to apply to the vehicles owned or operated by your business or organisation?	Number of responses	Percentage (%)
Total number of respondents that answered this question	250	-
Total number who skipped this question	317	-
Euro 4/5 diesel vehicles being used by blue badge holders	11	4
Euro 4/5 diesel vehicles being used by registered healthcare providers	8	3
Euro 4/5 diesel vehicles being used by registered community transport providers	5	2
Euro 4/5 diesel accessible taxi and private hire vehicles	5	2
Euro 5 diesel hybrid vehicles	3	1
Euro 5 diesel taxi and private hire vehicles	7	2
Recovery vehicles or breakdown trucks over 3,500 kg	7	2
Emergency service vehicles	8	3
Vehicles in the Special Vehicles tax class	5	2
Vehicles in the Special Types tax class	4	1
Vehicles in the General Haulage Vehicle tax class	12	4
Euro 4/5 diesel coaches with valid educational trip permits	3	1
None apply	204	72

Note that percentages are based on the number of responses rather than number of respondents

Table 17-50 is based on the number of respondents and as such removes any double counting.

Table 17-50 Responses to Question 8

<i>Are any of the following proposed local concessions likely to apply to the vehicles owned or operated by your business or organisation?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	250	-
Total number who skipped this question	317	-
Anticipate at least 1 concession	46	8
None apply	204	82

Note that percentages are based on the number of respondents to Question 8

Question 9 asked respondents to rank their top 3 proposed concessions. This included concessions offered until 2022 and 2025.

Responses to Question 9 are shown in Table 17-51.

Table 17-51 Responses to Question 9

<i>Ranking of proposed concessions</i>	1 (Highest priority)	2	3 (Third most important)	Total
Total number of respondents that answered this question	198			
Total number who skipped this question	369			
Euro 4/5 diesel vehicles being used by blue badge holders	27	26	24	77
Euro 4/5 diesel vehicles being used by registered healthcare providers	15	44	16	75
Euro 4/5 diesel vehicles being used by registered community transport providers	7	11	29	47
Euro 4/5 diesel accessible taxi and private hire vehicles (Delaying the introduction of charges until 1 Jan 2022)	10	15	7	32
Euro 5 diesel hybrid vehicles	3	4	4	11
Euro 5 diesel taxi and private hire vehicles	10	6	11	27
Recovery vehicles or breakdown trucks over 3,500 kg	6	10	14	30
Emergency service vehicles	71	16	13	100
Vehicles in the Special Vehicles tax class	3	1	6	10
Vehicles in the Special Types tax class	1	4	4	9
Vehicles in the General Haulage Vehicle tax class	19	11	13	43
Euro 4/5 diesel coaches with valid educational trip permits	16	8	15	39

Travel Behaviour

Question 11 in the business questionnaire asked, *'If your business has non-compliant vehicles, and none of the proposed exemptions or local concessions apply, what do you think your business or organisation would do if the zone is introduced in late 2020?'*

Respondents were able to select multiple options in response to Question 11. 179 respondents only wrote in the 'Other' comments section. 99 business respondents ticked multiple actions. Of those 99, 73 also provided in comments in the Other free text box.

Responses to Question 11 are shown in Table 17-52.

Table 17-52 Responses to Question 11

<i>What do you think your business or organisation would do if the zone is introduced in late 2020?</i>	Number of responses	Percentage (%)
Total number of respondents that answered this question	372	-
Total number who skipped this question	195	-
Minimise driving through the zone and pay the charge	77	15
Drive in the zone as normal and pay the charge	57	11
Change to a compliant vehicle	29	6
Change the way employees typically travel on business (not commuting to work) e.g. pool cars, walking, cycling or public transport	14	3
Reorganise the fleet to ensure only compliant vehicles drive through the zone	9	2
Not sure	68	13
Other	254	50

Note that percentages are calculated based on the number of responses to this question, not the number of respondents.

Supporting Measures

Question 12 of the business questionnaire asked 'We're considering the following supporting measures to be introduced alongside a proposed zone in late 2020. Which would be a priority for your business or organisation? Respondents were asked to identify their top 4.

Table 17-53 shows the responses to Question 12.

Table 17-53 Responses to Question 12

<i>Which would be a priority for your business or organisation?</i>	1 (Most important)	2	3	4 (Least important)	Total
Total number of respondents that answered this question	357				
Total number who skipped this question	210				
Retrofitting high-emission buses with cleaner engines	58	27	31	30	146
Anti-idling enforcement – to encourage vehicles to switch engines off when stationary	24	24	27	36	111
Additional and improved cycle parking	16	14	14	23	67
Reducing the cost of parking permits for ultra-low emission vehicles such as fully electric cars	5	13	23	19	60
More electric vehicle charging points	8	25	24	15	72
Extended opening hours at the park and ride	27	37	36	20	120
Overnight secure parking at the park and ride	8	15	27	19	69
Walk/scoot/cycle-to-school initiatives	15	15	19	22	71
Financial support for residents and local businesses that need it most to upgrade from non-compliant cars	81	58	27	25	191
Financial support for local businesses to upgrade from non-compliant commercial vehicles	98	42	19	27	186

Note that percentages are calculated based on the number of people who responded to this question – not the total number of respondents.

Question 13 asked 'We're also considering the following proposed supporting measures to be introduced after 2021. Which would be a priority for your business or organisation?'

Table 17-54 shows the responses to Question 13.

Table 17-54 Responses to Question 13

<i>Which would be a priority for your business or organisation?</i>	1 (Most Important)	2	3 (Least Important)	Total
Total number of respondents that answered this question	281			
Total number who skipped this question	286			
Additional improvements to walking and cycling routes	41	31	41	113
Introduction of electric cycle hire in the city	8	22	26	56
Expansion of low-emission car and van clubs in the city	10	16	18	44
Public transport improvements on key routes into the city and within the zone	128	56	27	211
Smaller park & ride sites along existing bus routes	39	72	43	154
Support for local HGV owners to retrofit Euro 4 and 5 diesel vehicles	46	19	34	99

Note that percentages are calculated based on the number of people who responded to this question – not the total number of respondents.