

## CONSULTATION ON CLEAN AIR ZONE NOW OPEN

You must reply by 26 November if you want your voice to be heard

Reply online using this on-line 13 step questionnaire:

<https://www.surveymonkey.co.uk/r/CAZconsultationindividualandgroup>

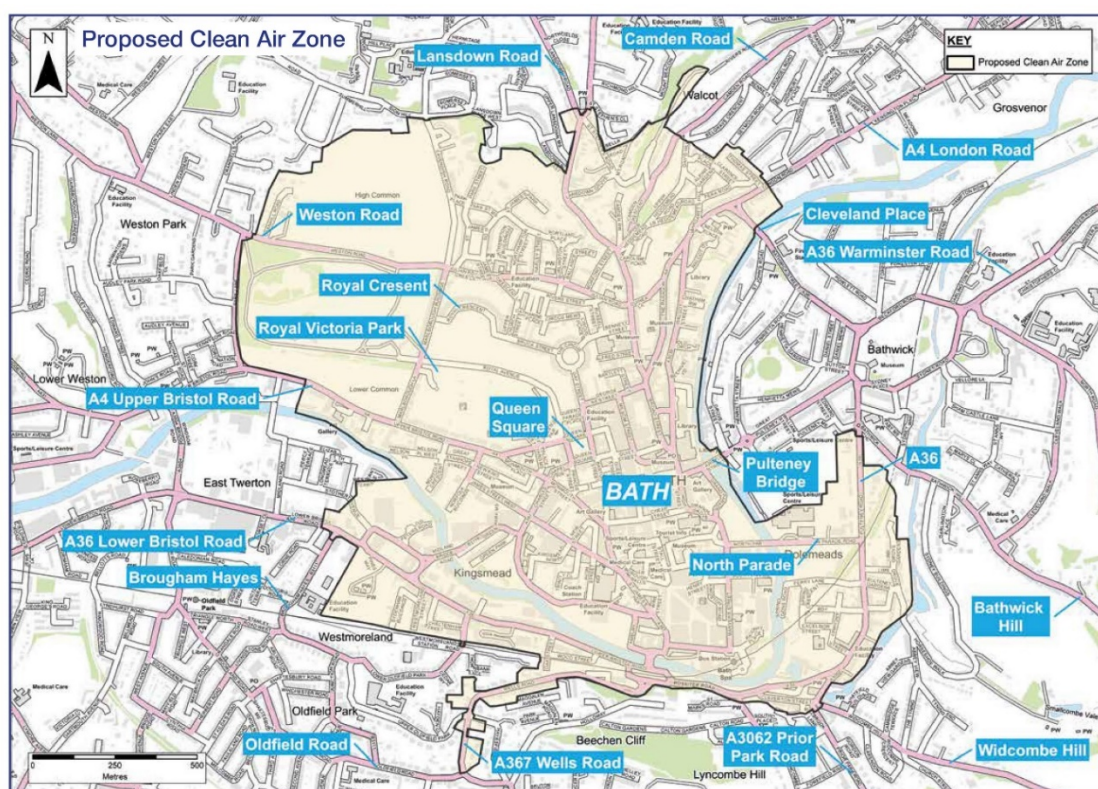
For reasons given below PERA has concluded that the CAZ boundary as proposed uniquely and disproportionately disadvantages residents in this area, and that it should be extended to include this area.

When you respond to the consultation be sure to state clearly your concerns about the proposals for this area and identify the area you would like added to the CAZ by indicating the most important roads you want included. It would also be helpful if you would say that you live in the Pulteney Estate area (the truncated postcode requested at the end of the survey isn't definitive on that).

### History

Based on outline proposals published in April, PERA argued that the Pulteney Estate area from Argyle Street through to Beckford Road, Sydney Road at the top of Sydney Gardens should be included in the Clean Air Zone, that cars be included to maximise the benefit and that there should be appropriate sunset periods for residents and concessions for disabled and carers. [See the associated documentation published on the PERA website.]

The consultation documents published last week have not extended the CAZ boundary as we requested. However, it has been extended further from Widcombe along Pulteney Road. The CAZ will stop short of the roundabout at the bottom of Bathwick Hill leaving the roundabout and the A36 to Warminster Road outside the CAZ – see map.



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### CAZ facts

Disappointingly, BANES have not included the Pulteney Estate area in the CAZ and there is no sunset period for cars (whether registered at addresses inside or outside the CAZ).

From late 2020, higher emission cars would be liable to pay a CAZ charge of £9 if they enter the CAZ. Cars that would be charged are pre-Euro 6 diesel vehicles, including hybrids (older than approx. 2015) and pre-Euro 4 petrol vehicles, including hybrids (older than approx. 2006). Full details of chargeable vehicles can be found on the Breathe 2021 webpages at <http://www.bathnes.gov.uk/bath-breathes-2021-overview/charges>

A CAZ charge will be applied for any 24 hour period in which a higher emission vehicle enters the CAZ. The CAZ charge is to deter higher emission vehicles and improve air quality – it's NOT a congestion charge and is not intended to reduce traffic. For example, haulage or delivery companies and bus companies will likely preferentially send newer vehicles from their fleet to Bath to avoid the £100 charge for such vehicles.

A CAZ charge would not be paid for a day on which a higher emission car parked in the CAZ was not moved.

A full list of exemptions and concessions is on the Breathe 2021 webpages at <http://www.bathnes.gov.uk/bath-breathes-2021-overview/exemptions-and-concessions> but key ones include Euro 4/5 diesel vehicles being used by blue badge holders or registered healthcare providers, for each of which there will be a concession until the end of 2021.

### **Impact on our area**

The impact of the changes now made to the proposed CAZ boundary is that the Pulteney Estate area would still be outside the proposed CAZ area, but is even more enclosed than before – in other words, the Pulteney Estate area would not be within the CAZ, but Pulteney Estate residents with “higher emission” cars effectively would have to pay the CAZ charge for most of the journeys they make, even if they are leaving Bath without going through the City Centre. It would be difficult or impossible to drive to the following without passing through the CAZ at Cleveland Place or Pulteney Road: the M4 (for London, Wales and the north), Bristol, Keynsham, Somerset towns, and the RUH.

Conversely, because our area is part of the heritage centre of the city, and parts of it are literally only a couple of minutes' walk from the most visited destinations in the City Centre (e.g. Roman Baths – over 1.2 million visitors last year), it will preferentially attract higher emission coaches and cars to drop off, park and wait here for visiting the City Centre or attending events in the city or at the Rec. We are uniquely singled out in this way.

**Our area is UNIQUELY disadvantaged in these ways – other areas outside the CAZ boundary are much further away from principal visitor attractions, and in general do not penalise people with higher emission vehicles for LEAVING Bath.**

The fact that William Street is not in the CAZ means that higher emission vehicles going to the Rec to deliver or undertake work will be able to access the Rec via William Street without passing through the CAZ. Parts of the Rec adjacent to North Parade Road and Pulteney Road are within the CAZ. This means that, if development takes place at the Rec, higher emission heavy vehicles will be incentivised to access the Rec via William Street to avoid the CAZ charge, rather than using the new main entrance proposed by Bath Rugby on North Parade Road which will be in the CAZ. This will clearly cause unacceptable nuisance to residents in and around William Street.

In view of the above, we have made strong representations to BANES officers that the Pulteney Estate area should be added to the CAZ. BANES officers currently take the position that the CAZ has to be as small as possible and that the improvement in air quality achievable with the currently proposed CAZ boundary is already sufficient without including the Pulteney Estate area. To persuade them otherwise, we would need to show that residents of this area support our inclusion in the CAZ.

The pros and cons of being inside/outside the CAZ, clearly supporting the above conclusions, are summarised below:

**Pros and cons of being outside the CAZ:**

Benefits	Disadvantages
<ul style="list-style-type: none"> <li>• BANES say that modelling shows this area will benefit from overall improvement in air quality. PERA accepts that may be true for Bathwick Street and Sydney Place but expects air quality may deteriorate in other parts of the area as a result of coaches and cars seeking to avoid CAZ charge.</li> <li>• With a higher emission vehicle you will be able to avoid the CAZ charge if you leave this area via the A36 or Bathwick Hill (only).</li> <li>• Visitors/tradesmen with higher emission vehicles arriving in Bath via A36 wouldn't have to pay CAZ charge to visit you – provided that they can find a parking space outside the CAZ.</li> </ul>	<ul style="list-style-type: none"> <li>• Asymmetrical CAZ uniquely disadvantages our area, which at Laura Place/Argyle Street is extremely near to main visitor attractions and commercial centre of Bath. This will preferentially attract higher emission coaches and cars arriving from A36 to drop off passengers without needing pay the CAZ charge.</li> <li>• CAZ avoiders will look to park in our area – e.g. the kind of “cruising” around the area that happens on rugby days, and increase in the existing problem of coaches waiting for returning passengers. Greater pressure on parking and disproportionate displacement of dirty emissions to our area.</li> <li>• Despite being outside the CAZ, drivers of higher emission cars will need to pay the CAZ charge every time they leave/arrive in the Pulteney Estate area via Cleveland Place or via Pulteney Road.</li> <li>• Whilst air quality <u>may</u> improve along the A36, the above issues will likely worsen air quality on the streets either side of A36.</li> <li>• Higher emission vehicles accessing the Rec via William Street will not need to pay the CAZ charge if arriving via A36.</li> </ul>

**Pros and cons if the Pulteney Estate area is included in the CAZ**

Benefits	Disadvantages
<ul style="list-style-type: none"> <li>• There will be an improvement in air quality everywhere, not just along the A36 and Bathwick Street</li> <li>• Higher emission vehicles will be deterred from entering this area just as much as from entering other parts of the CAZ</li> <li>• Higher emission coaches in particular will be dis-incentivised by £100 charge to enter this</li> </ul>	<ul style="list-style-type: none"> <li>• Any resident in the PERA area with a higher emission car would have to pay a daily CAZ charge every day they drive their car – not merely on any day on which they travel via Cleveland Place or via Pulteney Road.</li> <li>• Visitors arriving by higher emission vehicle along A36 (not just other routes) would have to pay CAZ charge.</li> </ul>

<p>area preferentially to drop off passengers close to City Centre</p> <ul style="list-style-type: none"><li>• £100 CAZ charge will deter use of higher emission vehicles for deliveries to Rec via William Street.</li><li>• Fewer higher emission vehicles on A36 = greater incentive for schoolchildren to walk to school along Beckford Road/Sydney Road rather than being taken by car</li></ul>	
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