

Camden Residents' Association

Response to the Breathe2021 Briefing at BRLSI on 19/04/18.

We agreed with you that the CAZ is the best opportunity to make a big difference to Bath after years of quiet incremental progress, and the effort going into it is impressively large. We don't want it to fail and we want to help you make it work.

The main points we wanted to feedback were:

STRATEGIC

We trust that the immediate effect of the CAZ will be a demonstrable reduction in NO_x levels, to well below the 40µg/m³. In so doing we expect that traffic levels will reduce noticeably in, and close to, the zone and that this should open all our minds to the advantages of a more vehicle free Bath with:

- streets and spaces with less vehicular congestion and conflict
- better air quality
- a more conducive environment for relaxing, walking and cycling.

Over time, more exempt vehicles will increase traffic levels again. We deeply hope that surpluses generated from the scheme will go towards encouraging new attitudes towards travelling into and through the city and thereby sustain the initial changes in traffic levels achieved.

EXTENT OF THE CLEAN AIR ZONE

1. Your own emissions pie chart slide (comparing emissions at Lambridge and Anglo Terrace) strongly suggests that the narrow and congested Camden Road is currently a cut through for some high NO_x emitting traffic and if monitored assiduously would carry higher pollution levels than people might think.
2. The 'Small Zone', as now depicted, cuts across Camden Road thereby stopping the NE Bath 'rat run' from the A46 at Upper Swainswick to Camden Road. This involves traffic passing alongside three schools entrances and perimeters with narrow pavements. This could facilitate a change from car-based 'school runs' to school buses, walking and cycling which will improve public health and safety.
3. The current maps reveal a 'cut round' from Fairfield Road to Richmond Road and thence out to Lansdown Road via Charlcombe Lane. This is predictable traffic displacement involving dangers to residents and those involved in four schools (St Stephens, Royal High and possibly Kingswood and the new St Alfege School in Ensleigh) and must be considered carefully in the final solution.
4. We note your view that the recently collected ANPR data suggests that of HGV traffic travelling along London Road only 3% of this continues SE on to the A36. This sounds incredibly low despite your double checking. Nonetheless the rest must be using the A36 going South and westwards which will continue to afflict the communities of Bathwick and Widcombe, pedestrians and cyclists as well as two historic parks and another school.

CHARGEABLE VEHICLE CLASSES

5. Our observations of traffic make us believe that class D cars must be included. The pie charts suggest that nothing is likely to change enough for us in Camden and probably elsewhere, if it doesn't. This would be a small but necessary sacrifice of personal freedom for many to gain the desired effect.

RISKS TO SUCCESS

6. Holistically it has to make sense to the population. It does not have to be the ultimate solution at this stage but it must seem viable and beneficial, if less convenient to some.
7. Unless you get buy-in from those likely to have change driving behaviours then you will fail. You can influence but you have no absolute control over this as polluters can still pollute if they are prepared to pay or fiercely oppose and somehow derail the CAZ scheme. This needs very careful and considered messaging, weighing up of the benefits versus the inconvenience, and the absolute backing and leadership from the politicians.
8. You speak of failing if the solution makes a financial surplus. It's more nuanced than that. Yes, it's got to bite sufficiently hard so that most 'dirty' vehicle owners don't swallow the cost and continue as before. But those that can afford it still will and those that can't will be ill served and shut out of the city centre. Unless the surpluses are invested in viable alternatives to help people who need cheap access to the city centre then this will look like a solution to serve the rich and punish the poor. This is completely regressive and will seem unfair to most of us. Those funds will also be required to make the secondary changes needed.
9. There is a parallel with the 2007 smoking ban in enclosed public spaces. Unpopular with those who were compelled to smoke outside it but highly protective to those working in pubs and clubs and a far cleaner environment for customers, and it has now reduced overall smoking by 20%: few, if any, would now contemplate reversing the measure.
10. If successful we think the CAZ will be a further impetus for change in Bath but there are very strong resistive forces which pose a high risk of failure, if not addressed and/or ameliorated, such as:
 - a sense of entitlement to drive unrestrictedly in Bath
 - protests from drivers conducting 'school runs' which are likely to be charged by the CAZ restrictions, if higher emitting cars are included
 - people with sufficient wealth to pay the CAZ charges and enjoy driving at will on decongested roads (if London precedents are adopted, then inner CAZ residents with 'dirty' cars will get 90% discounts and will then be able to drive at will around the city)
 - current wide dispersal of schooling and after-school activities, even within the same families requiring safe transit methods, if car use is restricted
 - local business lobbies believing that residents and visitors will stop wanting to work, shop and relax in the centre of Bath, despite better amenity – where else will they go? On the contrary shopping in a clean air environment is what most malls offer and what a UNESCO world heritage site should provide.
 - lack of belief in the reason for doing it – i.e. the public health hazards of NO_x and its associated pollutants
11. To counter these we've heard various compelling ways of putting the case for the CAZ. Some of these are:

- Bath is one of 29 cities and towns in Britain that has to comply with this High Court Direction because it is a recognised public health issue affecting the young and old particularly. Yes, we may have to rethink how we get around Bath, but everyone's health will be safeguarded
 - Bath is unique in the UK, being the only whole city to be considered as a UNESCO world heritage site – for others it is often just the centre. One of the criteria it is judged on is clean air so failure could put this at risk
 - The most polluted areas, close to the station and east of the city, are much used by residents, commuters and visitors
 - This is a great chance for the city to tackle the harder traffic related emissions problems and should not be seen as political party issue. The council is compelled to respond with a workable and effective plan to qualify for funding from Defra.
12. Foremost amongst your aims, as discussed on the night, is your intent to change the composition of the vehicle fleet travelling into the CAZ in Bath by 2020 which will give you less than 18 months to achieve this. Maybe there is some inbuilt flexibility possible for hauliers with larger fleets but for local drivers this flexibility is not there.
13. However we have seen a statistic suggesting that the average tenure of a car is six years now so a modest turnover would only be possible by 2025. In addition for many car owners this means buying a new, or nearly new car, (not just a replacement) between now and 2020. This is a forlorn hope which no one in the room thought you had the slightest chance of achieving. Those that can afford to might, but many people run older cars worth virtually nothing but could cost more than £15,000 to replace with a low NOx emissions vehicle. This is impossible to envisage happening despite scrappage schemes and other incentives.
14. In our estimation you have far more chance of getting to the emissions levels required by altering driving behaviours rather than upgrading cars. This will be achievable, in part, by making the costs of encroachment prohibitive but also needs the provision of alternative quick solutions and ideas which have to be argued for as part of the business case. These might be:
- more relevant and cheaper bus routes
 - subsidised taxis
 - incentivising walking and cycling in their separate ways
 - subsidising the hire or purchase of electric bikes
 - making home deliveries more efficient
 - making P&R and other natural hubs, such as stations, into centres with free or subsidised transit into and around the city
 - school buses
 - prioritising the transit of buses through the city and beyond
 - providing safe, well-worked-through journeys across the city for school children.
15. The worst outcome is failure. We do not understand what the legal consequences of failure are. If they are a financial penalty, then that will ultimately be paid by the population of Bath in some way or other which will certainly stick in the throat of many of us and simply add to the mounting frustration

Maybe this would take us to a breaking point? If there is a reputational risk to the party in power then that's perhaps a strong force in favour of getting the proposed solution to work. If the council fails then maybe they will be subject to special measures imposed by Central Government.

Yours sincerely,

Jeremy Labram Chair of Camden Residents' Association. 03/05/18.