BMA Response to Air Quality Action Plan consultation

November 2017

This is a response to the public consultation on the Bath & North East Somerset Council Bath Air Quality Action Plan -Consultation Draft (Final) August 2017. It is submitted on behalf of the Bathampton Meadows Alliance ("BMA").

Introduction

The BMA welcomes the opportunity to be part of the conversation to identify the most effective solutions to Bath's poor air quality. The challenge is to devise a basket of prioritised measures which will be cost effective in reducing the City's poor air quality quickly, effectively and *permanently*, so that the City becomes a healthy, green and appealing place to live, work and visit.

Bath has grappled with levels of air pollution injurious to health and wellbeing for the best part of two decades, with its first AQMA declared in 2002. In recent years NO2 readings have shown a welcome, if gradual, decline in some parts of the City. For the most part this appears to be a passive trend – suspected to be largely attributable to the gradual improvement in clean air technology in the HGV, LGV and private vehicle fleet. A notable exception is the dramatic improvement in air quality over the first year since inception of the new Widcombe High Street layout as a result of the Rossiter Road re-routing work, which illustrates neatly the positive impact that a well researched and implemented capital intervention can make. Less a capital intervention and more a felicitous accidental consequence is the improvement in air quality seen in Batheaston in 2015 when the A36 was closed for some weeks for major stabilisation works. The closure meant cars no longer crossed the toll bridge from Batheaston to link with the A36, and found other routes, and saw NO2 levels fall on average by 7.5 micrograms/m3 over the closure period. Closing local roads can be seen to have a dramatic impact on local air pollution.

NO2 emissions remain resolutely high, and at illegal levels in many parts of the City however, unsurprisingly in the context of a road network operating at 96% capacity and rising. [1] Yet this Council is committed to an ambitious development programme which will bring more traffic into the City, hoping to attract ever more residents, commerce and visitors. An unwillingness to really tackle poor air quality root causes is seen in the latest draft Parking Strategy. Although the draft Parking Strategy is yet to be adopted, to our reading it will result in an increase in short stay trips into the City and cannot be allowed to become policy if there is any serious ambition within the Council to deliver safe air quality levels. [2] We believe measurable improvements to air quality will be undeliverable until those responsible for transport policy and investment, traffic management, and air quality operate in concert; until the silo approach to departmental governance is replaced with an integrated strategy with public health, air quality and congestion at its heart.

[1] Transport Evidence Explanatory Note CD/PMP/B27 Bath: Park and Ride Expansion

[2] Please see the submission of the BMA on the draft Parking Strategy Consultation for our full commentary on this document. It can be found here: http://bathamptonmeadowsalliance.org.uk/wp-content/uploads/2017/11/BMA-Parking-Strategy-consultation-response-22nd-October-2017.pdf

Sometimes things have to get really bad before they can be turned around. So it seems with Bath's air quality. Bath is now identified as one of the 29 most polluting Local Authority areas in the country, and as a result has grabbed the attention of national government, and is the focus of DEFRA's mandate to *"develop and implement a plan designed to deliver compliance [with national and EU limit levels for NO2] in shortest time possible.* With national focus, comes national funding, and there is, finally, an opportunity to begin to reverse the disastrous impact of years of chronic under (and mis-) investment in Bath in measures designed to reduce congestion and improve air quality.

The BMA would like to believe that the Council's commitment to improving air quality goes beyond taking the steps mandated by Government. The City needs to be more ambitious than that. Improving the quality of life in Bath is not just about getting the NO2 figures on the London Road below 40mg, though that will be a momentous achievement which we hope will reap unintended, but nonetheless welcome rewards elsewhere in the City. A common refrain is that Council has no budget for air pollution. What this says about Council priorities is a discussion for another paper, but the absence of a budget is no excuse for not having public health at the heart of Council strategy. If this Council is committed to giving its citizens clean air to breathe, and in creating an environment where people are supported and encouraged to live healthy, active lifestyles it can do so by only implementing schemes which make a positive contribution to those outcomes. This means making questions such as "what will be the impact of this on traffic congestion and air pollution?" and "how will this scheme enable those who live/work here to live active healthy lifestyles not reliant on private car use?" the first to be asked in the context of any new development. The BMA believes the Council currently asks the wrong questions first.

Adopting an evidence based approach to selection and prioritisation of measures will be key to the success of this plan; what particular problem will a particular measure ameliorate or remove? How do we know this to be true, and how can success be tested and measured? So too will an integrated approach to development which sees those responsible for commercial and major residential schemes, transport planning and parking strategy collaborating for the health and well-being of those who live, work and visit the City. The City faces tough decisions, and capital infrastructure schemes which promise only "not to make things worse" must make way for schemes which have at their heart the goal of r*educing* congestion and pollution, of changing the way we think about living in and travelling to and around this World Heritage space.

Our Submission: Executive Summary & Recommendations

1. The ANPR Survey will provide a hugely welcome data set on traffic movements across the main arterial routes of the City. However unless further work is done on two fronts, the data set will leave analysts with key further questions. First there should be supplementary research into the causes of congestion. While the ANPR will tell us the total number of cars travelling to different places, we still will not know why and what would motivate drivers to switch to more sustainable modes. Second unless a comparison is enabled between normal school term traffic and traffic when state and private schools in Bath or on holiday, an incomplete picture will be presented, particularly with regard to the situation on the London Road, since changes to journey patterns made between term and school holiday time are likely to account for in excess of 30% of morning peak time traffic to the East of Bath. Air pollution solutions must be prioritised towards tackling times when congestion is highest as well as the right root causes of congestion – during the morning and afternoon peaks, and school traffic comprises a huge part of this.

The Council should deploy funds earmarked for feasibility studies on an A36/A46 Link, since the impact of the school run will need to be understood in the context of that project, but the research will more immediately inform the focus of the new Air Quality Action Plan. Transition Bath advocate investing in permanent ANPR infrastructure, and we agree that this would provide a solid statistical base going forward on which to base transport investment decisions.

Recommendations:

(a) Expand the ANPR research to include data enabling a comparison of traffic between normal school term and state and private school holidays.

(b) Consider possible funding of this through the feasibility funding made available for the A36/46 link road.

(c) Invest in permanent ANPR monitoring to provide game changing factual data to inform future choices and investment.

(d) Carry out further research into understanding why drivers are in their cars and what would motivate them to move to other more sustainable modes.

2. The Council should proceed to implement a Clean Air Zone in the shortest time frame achievable. The Council's newly launched Parking Strategy does not provide the necessary disincentive to private vehicles to enter the City centre, making it likely that only a "broad catchment" CAZ will be effective - capturing private vehicles as well as HGVs and LGVs. Taxing individuals on their choice to drive into the city is a vital tool in directing behavioural change.

   Recommendation:

   (e) Implement a broad spectrum charging CAZ, which includes private vehicles as well as HGVs, LGVs and tourist coaches.

3. There should be a fundamental recalibration of the lines of communication between those departments within the council whose decisions and actions will impact upon air quality and congestion. These include planning, public health, transport and the environment as well as the air quality teams. "What will be the impact upon air quality and congestion" should be among the first questions to be asked in relation to planning, development and investment decisions. The answer to the question must in all cases be founded in evidence, not speculation. Officers' reports should be required to state how the recommendations within the report will impact upon air quality. This would mean for example that the current parking strategy would have to consider its implications upon air quality, as would future development and other proposals such as expansion of the Christmas market.

   Recommendations:

   (f) Make it a constitutional requirement that every relevant council report include a statement as to how the report's recommendations impact upon air quality. This would be in addition to the current required statements on finance, equalities and legal implications.

   (g) Require a report on the implications of the proposed Parking Strategy on air quality before this strategy is adopted. The strategy should not be adopted until there is confidence that it will contribute to the goal of reducing air pollution and congestion.

   The Final Air Quality Action Plan should commit to preparation and implementation of a Local Cycling and Walking Infrastructure Plan, as recommended by the Department of Transport's 2017 Cycling and Walking Investment Strategy. It is an essential pre-requisite to unlocking government funding for cycling and walking *initiatives*, and there is a wealth of community expertise from cycling groups to help inform such a plan. Such a plan is a

high feasibility, low cost, high output measure which should be implemented as a matter of priority.

Recommendations:

(h) Prepare, with community input, and implement a Local Cycling and Walking Infrastructure Plan, and report progress against it.

(i) Use the Plan, and the city's monitored progress against it to unlock national funding; prepare intelligent, informed and persuasive bids for national funding to improve cycling and walking infrastructure.

4. The list of potential actions lacks ambition. Bath is not the only city grappling with illegal levels of air quality and other cities around the country are beginning to develop bold, ambitious ideas to improve air quality and create healthy environments. We would like the Council to be less fearful of local Bath business, which has proved resistant to the idea that vehicular traffic in the centre must be reduced to improve our air quality and make our inner city a more pleasant place to work, shop and live. We do not believe this would be the death of our High Streets, but rather their renaissance.

Recommendation:

(j) Draw inspiration from what other Cities battling poor air quality are doing. Critically assess the draft Action Plan against the proposals being drawn up and implemented by others.

(k) Listen to independent, informed voices. Place the fears of local business into a realistic context. They are understandable, but may not legitimate and should not guide policy. Encourage business to re-imagine a city devoid of polluting, congesting traffic as one which will bring about a renaissance, not the death of our High Streets.

(l) Take the best from other regional initiatives and recast the plan into one which is focussed, driven, measurable and achievable.

5. The Plan does not sufficiently emphasise the pivotal role to be played by public transport, in particular buses. Through WECA and the Bus Services Act 2017, there is new opportunity to deliver a fresh approach to our bus services via greater franchising powers. Bath needs a frequent, reliable, sustainable bus service between its suburbs and more rural communities and the City centre, to undermine dependence on the private car.

Recommendation:

(m) Set up a dedicated task force, with community input, and under research guidance from Bath University or the University of the West of England, to understand the shortcomings in current bus service provision in the City and surrounding rural areas, including routing, frequency, reliability and pricing, and use this information to formulate detailed Bus Quality Partnership and Direct Franchise proposals.

(n) Put in place a measurable action plan for negotiating and implementing in the shortest time frame possible, Bus Quality Partnerships and Direct Franchising through WECA.

6. Inaccurate, unevidenced statements continue to be made in favour of the case for expansion of Park & Ride as a weapon in the battle for air quality, and these must stop.

Recommendation:

(o) The Plan must cease to refer to there being a 16% increase in P&R patronage as a result of the Bath Transport Package. Such an assertion is demonstrably false and misleads both the public and DEFRA into believing it is a future solution that would work for Bath.

Our Submission: In Detail

1. **The APNR Survey & the School Run.**

   The BMA is delighted that funding has become available to conduct an ANPR study through Bath. We hope it will reveal solid data about traffic movements of all classes of vehicle in and through the main arterial routes of the City. The BMA has long campaigned for an evidence base of this calibre, and it is a vital step in formulating and prioritising the measures which should be taken to meet national and local air quality improvement imperatives.

   One further step that we feel is critical is greater research into understanding why people are in their cars and what would motivate them to other more sustainable modes. Without this part of the evidence base, interventions can only be blanket, rather than targeted. Such research might present the Council with different priorities to tackle or prevent them investing in measures that do not work.

   We were also disappointed that the survey was not timetabled to include a direct comparison between traffic during a normal school term week, and one when state and private schools in Bath are on holiday. We would like to see the survey re-run for a fortnight overlapping the February 2018 half term week. There is strong evidence to suggest that **East of Bath vehicular traffic drops by *at least 30%* during school holiday periods**. We believe this because:

   - The BMA carried out a five-week automated road traffic count at 240 London Road (Batheaston High St) during March and April 2016 (05/03/2016 to 08/04/2016), using Transport Data Collection, a company that B&NES has used for similar work. The collection period covered three weeks of term time leading up to the Easter Holidays, the first week of the holidays when all independent and some state schools in the area were off, then the second week of the holidays when all local schools were off. The results showed **a 33% drop in traffic between term time weeks vs the all school holiday week in the 7am-9am period** (see next slide for the data table). For the afternoon peak there was a 9% drop, but by this time of day (and as city centre residents would say), families are out enjoying the holidays, as are day trippers, so this time of day is much more difficult to understand without further research. The changes in traffic volume on Batheaston High Street between term time and the Easter 2016 holiday period holidays are tabulated below:

Batheaston High St traffic volume changes during Easter holidays 2016 (7am-9am)

Volume of cars passing 240 London Road (Batheaston High St) 7am to 9am	Mon	Tues	Wed	Thurs	Fri	Weekday total (excl bank holidays)	Weekday average (by week, excl bank holidays)	Average term time weekday	% decrease (average term time weekday vs respective average holiday weekday)	who was off?
05/03/2016 TO 11/03/2016 (termtime 1)	1092	1054	1116	1027	1034	5323	1065	1078		Nobody
12/03/2016 TO 18/03/2016 (termtime 2)	1138	1147	1128	1055	1072	5540	1108			Nobody
19/03/2016 TO 25/03/2016 (termtime 3)	1047	1074	1061	1061	119	4243	1061			Nobody (inc Good Friday)
26/03/2016 TO 01/04/2016 (week 4)	263	827	835	822	825	3309	827		**23.2**	Independent and some state (inc Easter Monday)
02/04/2016 TO 08/04/2016 (week 5)	770	590	728	738	814	3640	728		**32.5**	All schools

Source: Transport Data Collection ATC count 05/03/2016 to 08/04/2016

Batheaston High St traffic volume changes during Easter holidays 2016 (3pm-5pm)

Volume of cars passing 240 London Road (Batheaston High St) 3pm to 5pm	Monday	Tuesday	Wednesday	Thursday	Friday	Weekday total (excl bank holidays)	Weekday average (by week, excl bank holidays)	Average term time weekday	% decrease (average term time weekday vs respective average holiday weekday)	who was off?
05/03/2016 TO 11/03/2016 (termtime 1)	1100	1055	1111	1114	1156	5536	1107	1086		Nobody
12/03/2016 TO 18/03/2016 (termtime 2)	1099	1089	1138	1088	1203	5617	1123			Nobody
19/03/2016 TO 25/03/2016 (termtime 3)	1121	845	1029	1119	758	4114	1029			Nobody (inc Good Friday)
26/03/2016 TO 01/04/2016 (week 4)	646	1027	1077	1073	1086	4263	1066		**1.9**	Independent and some state (inc Easter Monday)
02/04/2016 TO 08/04/2016 (week 5)	1042	991	1004	1072	844	4953	991		**8.8**	All schools

Source: Transport Data Collection ATC count 05/03/2016 to 08/04/2016

- In 2017, the University of Bath, in conjunction with the South West Foundation and Transition Larkhall, carried out a research project on traffic in the Larkhall area. Volunteers spent 126 hours between 13th February 2017 and 25th February 2017 counting approximately 39,504 vehicles in the 3 separate locations, chosen because they are the only alternative access points for through traffic to Bath avoiding the London Road, thus examining the "rat run" effect. The dates in February were carefully chosen, as one was a week when all schools state and private were at school, the other when all schools state and private were on holiday. **When all schools were on holiday, decreases in traffic of between**

33% and 49% were observed depending on location. Dr Ian Walker, Associate Dean at the University of Bath who directed the study, observed that:

> *"The average level of traffic on term-time weekdays is higher than the average level of traffic in the other three situations [weekdays when only private schools are on holiday, weekdays when private and state schools are on holiday, and weekends], and this difference is statistically significant. This means term-time weekdays are very likely fundamentally different to the other three situations as there would only be a tiny chance of seeing numbers like these if they were not."*

The full report of this survey is very informative, and can be found here:
How do Parents take their children to school and why do they choose to travel that way

We want the Council to acknowledge in the final Air Quality Plan that the impact on pollution and congestion of the school run is likely to be significant but is poorly understood. For example there has been no examination of parental behaviour between school and work in the city- generating traffic movements criss-crossing the city between school, place of work and home. Parents might still work during school holidays, but take different, more direct routes to their place of work. It would be hugely beneficial if not only were the ANPR survey re-run to enable the school run effect to be registered, but for this work to be supplemented with proper surveys of parents (via schools) to unpick changing travel habits during holiday periods.

The apparent connection between peak hour congestion and the school run is strongly indicated by the evidence – and is hugely significant in terms of volume. If verified by full traffic count and ANPR data it is a "game changer" in terms of measures to be prioritised to manage vehicular traffic pressure on our key arterial routes, which should be focussed on the mass transit of school pupils by means other than private cars.

The BMA understands that funding has been secured for feasibility studies into an A36/A46 link road. Whilst it is our view (discussed further below), that the possibility of such a link can have no place on a list of measures designed to bring air quality across the City to within legal limits within the shortest possible time frame because of the lengthy gestation period of a project of this scale, cost and likely level of public opposition, nonetheless there is available a pot of funding for studies which will, in the fullness of time have to examine the very thing we are talking about here – the impact of school run traffic on the London Road. Would it not be sensible to apply some of this funding to a re-run of the ANPR survey in February 2018, so that it could find usefulness not just for the Link Road investigation, but more importantly, and far more urgently, for the purpose of devising an action plan of the quality and deliverability that DEFRA are now demanding?

2. **Clean Air Zones**.

The BMA supports the proposal to undertake a feasibility study into Clean Air Zones. The newly launched Parking Strategy does not go far enough to deter private vehicles from entering the city centre. The very recent proposal by Oxford City to ban all diesel cars from its city centre from 2020 is audacious, but not expected to raise the level of objection in Oxford that they might in Bath, as Oxford is seen as an environmentally aware city – a reputation to which Bath should aspire. If this is seen as a step too far for Bath, then the introduction of a wide- ranging charging CAZ, where drivers are not banned, but must think about, and pay for their choice to travel into the centre, needs to be a step this Council is prepared to take. We believe the CAZ

should include private vehicles as well as HGVs and LGVs. Whether the zone should include local buses and taxis is a complex issue, as we would not wish the CAZ to undermine the feasibility of public transport services, and buses and taxis will need support to be encouraged to retrofit polluting vehicles and over time to regenerate fleets to more modern, less polluting vehicles. We do think however that the Council should be tough with visiting tourist coaches. We have heard that on some "whistle stop tours" passengers do not disembark at all (other than perhaps to take photographs), meaning that there is no economic, social or health benefit whatsoever to the City from these polluting vehicles. Tourist coaches should be charged to enter the City, and obliged to park outside the central zone.

3. **Active Travel Measures.** The BMA welcomes the initiatives set out under Section B –provision of additional cycle parking, the safe routes to school measures and the proposal to implement a package of walking and cycling priority schemes. We see these as complementary to a CAZ – the "carrot" to the CAZ's "stick".

   We would advocate including within this Section of the approved Air Quality Action Plan[3] a commitment to preparation and implementation of a Local Cycling and Walking Infrastructure Plan. In April this year, the Department of Transport published its Cycling and Walking Investment Strategy (CWIS). It contains a framework to assist councils to Local Cycling and Walking Infrastructure Plans (LCWIPs). These are a new, strategic approach to identifying cycling and walking improvements required at the local level. They enable a long-term approach to developing local cycling and walking networks, ideally over a 10 year period, and form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle. The following is written in the Government's forward to the CWIS:

   > *If we can increase levels of walking and cycling, the benefits are substantial. For people, it means cheaper travel and better health. For businesses, it means increased productivity and increased footfall in shops. And for society as a whole it means lower congestion, better air quality, and vibrant, attractive places and communities.*
   >
   > *Those benefits explain the Government's ambition for walking and cycling in England. We aim to double cycling activity by 2025 and each year reduce the rate of cyclists killed or seriously injured on English roads. We aim to reverse the decline in walking that we have seen over the last few years. For that to happen, we want cycling and walking to be the natural choices for shorter journeys in every urban and rural community in England. For cycling or walking to be normalised in this way, they need to be safer, and be perceived to be safe, normal and enjoyable ways to travel.*
   >
   > *We cannot achieve these changes alone. Our ambition will be delivered only if we bring people together in local places, including local government, businesses, charities, and the public - the same approach taken in other nations, such as the Netherlands. This ambition is part of our commitment to build a society and an economy that works for all people. To achieve this, we have published guidance on the preparation of Local Cycling and Walking Infrastructure Plans. The guidance will help support local delivery partners to identify and deliver individual and tailored interventions fit for their own local areas and get the most out of existing tools, such as the Propensity to Cycle Tool. The Government will only take a lead*

[3] Or in Section E, Promoting Travel Alternatives

on issues which require a national approach, such as setting the framework, and sharing knowledge and good practice."

The key outputs of an LCWIP are:

- a network plan for walking and cycling which identifies preferred routes and core zones for further development
- a prioritised programme of infrastructure improvements for future investment
- a report which sets out the underlying analysis carried out and provides a narrative which supports the identified improvements and network

By taking a strategic approach to improving conditions for cycling and walking, LCWIPs will assist the Council to:

- identify cycling and walking infrastructure improvements for future investment in the short, medium and long term
- ensure that consideration is given to cycling and walking within both local planning and transport policies and strategies
- make the case for future funding for walking and cycling infrastructure

While the preparation of LCWIPs is non-mandatory, the CWIS makes clear that Local Authorities who have plans will be well placed to make the case for future investment. There is a resourcing cost to this initiative, but the Government has provided a toolkit and access to technical assistance for implementation. Cycle Bath are advocating that the Council prioritise the preparation and implementation of an LCWIP[4] and would undoubtedly provide a wealth of expertise to Council in imagining and realising an ambitious but achievable programme of measures to improve Bath's accessibility by bike. Measures could include ensuring that planning policy becomes an enabler of walking and cycling friendly initiatives, for example by requiring developments to improve pedestrian access and provide cycle storage and even showering facilities in offices. S106 contributions could be required to provide this off site, especially if not included in the development. Using the categorisation system in the consultation, we would assess this as a high feasibility, low cost, high output measure which should be implemented as a matter of priority.

4. **A Visionary Approach.**

The Plan lacks vision. It is frankly depressing to see Park & Ride expansion and the A4/A36 Link Road given continued prominence. There is no acknowledgement of the evidenced limitations of Park & Ride and its negative contribution to overall air quality. Moreover it is fanciful to include (indeed give sole billing to under the "Transport Planning & Infrastructure" section) a Link Road in a conversation about reducing air pollution in the shortest time frame possible. Only a radical plan will positively impact upon traffic- generated air pollution. Bath is not alone with its air quality problems, and it can learn from what other cities are doing. In London for example, the

[4] See article at https://cyclebath.org.uk/2017/09/15/cwis-and-not-getting-a-fair-crack-of-the-lcwip/comment-page-1/#comment-3532

Mayor has created the "Healthy Streets Approach" to help to improve air quality, reduce congestion and make London's communities become greener, healthier and more attractive places in which to live, play and do business. The Approach includes this within its vision:

"Our vision for the future of London is of a city where people choose to visit their local shops. A city where high streets are designed for people and the neighbouring streets are pleasant to be in; where people choose to take the bus instead of driving because buses are prioritised over other traffic. It is a city where essential delivery and service vehicles can get around efficiently, keeping everyone's lives running smoothly. London can become a city where people choose to walk, cycle and use public transport more, bringing huge health and wellbeing benefits to everyone. Providing more appealing walking, cycling and public transport options is the best way to reduce car use."

The full strategy can be reviewed here:

http://content.tfl.gov.uk/healthy-streets-for-london.pdf

On page 35 of the draft, paragraph E3 of the section on Promoting Travel Alternatives mentions use of such initiatives as variable messaging and anti- idling campaigns. We agree these would be helpful in changing driver behaviour. The council might like to see the work of Wandsworth City Council in this regard – it can be viewed here:

http://www.wandsworth.gov.uk/news/article/14177/campaign_urges_drivers_to_switch_off_car_engines.

We would like the Council to draw inspiration from what other cities are doing. We would like the Council to listen to independent, informed voices about how a future of Bath not reliant on the private vehicle might look. We would like the Council to be less fearful of local Bath business, which has proved resistant to the idea that vehicular traffic in the centre must be reduced to improve our air quality and make our inner city a more pleasant place to work, shop and live. We do not believe this would be the death of our High Streets, but rather their renaissance, and the Council needs to be evangelical in its promotion of a near car – less city centre.

5. **A Strategy for the Bus Network**

We are pleased to see *"Encourage West of England Mayor to introduce advanced Bus Quality Partnerships and Direct Franchising"* identified as one of the alternatives to private car use, and agree with the assessment that this could have a high impact on air pollution. An efficient and affordable public transport system is as important to the City as great walking and cycling opportunities, both for the health of Bath's residents, and the attractiveness of the City as a place to live and work. It should form a central plank in the Council's long term plans to improve air quality, because, as with cycling and walking, the easier it is for people to travel by public transport, the less likely it becomes that people will choose to get into their cars.

The Bus Services Act 2017 which received Royal Assent this April has introduced a range of new tools for local authorities to use to work with bus operators to improve services for passengers. WECA now has the power to franchise local bus services. B&NES can now work collaboratively with bus operators to agree how best to improve the local network to make it more attractive to passengers and raise the environmental standards of the buses used. A package of improvements might range from bus priority measures, reducing idling and journey times, introduction of low emission vehicles along key routes, to the creation of a significantly

enhanced local bus network. DEFRA in its Plan for tackling roadside NO2 concentrations has urged local authorities to work with bus operators to take advantage of the opportunities this new legislation brings to improve local air quality and reduce congestion.

The draft Air Quality Action Plan identifies Bus Quality Partnerships as having a "medium" feasibility. It concerns us however that there is no visible energy being applied to promoting this within the Council at present. Nothing at all is likely to happen until the current level of service and its shortcomings are understood and the Council should be arming itself now with evidence for the conversations with WECA ahead. There is an opportunity to bring about transformative change to our bus services but the groundwork should be done now. We think the Council should set up a dedicated task force to understand the problems in current bus service provision in the City and surrounding rural areas, including routing, frequency, reliability and pricing. Perhaps the University of Bath, or the University of the West of England could become involved? Might it be possible to engage with one or both of these institutions to resource and implement a properly structured piece of research, and use this information to press for Bus Quality Partnerships and Direct Franchising through WECA? Acquiring the evidence to inform change in our bus provision is a high feasibility, low cost, high outcome measure which the Council could take easily and quickly.

What we dislike about the Proposals.

We speak above of our disappointment that the Plan lacks vision. It contains some good ideas, but they are not developed and the plan lacks cohesion and any clear direction of travel. It is to be hoped that consultation responses will help inform a major revision to the published plan. By way of final observation, there are aspects of the draft plan with which we take particular exception, and these are set out below:

1. The BMA is disappointed to see that "Expand existing Bath's Park & Ride provision" finds voice under the section of proposed measures entitled *"Alternatives to private car use: Public Transport".* We take issue with this on a number of grounds:

    (a) The consultation draft asserts that the Bath Transportation Package has resulted in an additional 890 park and ride spaces across the three existing park and ride sites, "facilitating a 16% increase in P & R patronage between 2008/09- 2016/17. Whilst the number of park and ride bus passengers may have increased by 16% over the longer term (since 2007/8), they have declined since the full implementation of the Bath Transportation Package and the investment in expansion of existing Park & Ride was completed. These figures cannot be used as a measure of success of the BTP, yet this is precisely the claim that is being made for them by the Council's Transport Officers. There is no evidence that the number of cars in the park and rides (surely the only sensible reference point in a conversation about air quality and congestion), indeed the only publically available figures indicate that use had declined since the expansions were given planning consent. It is misleading to have correlated a long term increase in bus patronage with anything other than an argument that long term investment in bus routes is a good thing, more so when bus passengers may have boarded anywhere along the bus route, and when no other data is presented as to the number of cars using the P & R car parks and at what times. It is most assuredly wrong to use this statistic to evidence success of the BTP or to champion Park & Ride.

A similar claim was made in the recently closed consultation on a Parking Strategy for Bath; the figure of 16% has gained an unwanted, pernicious credibility within the Council. It is a false, meaningless statistic, and it is deeply worrying that it appears to have gained the status of some kind of "alternative truth" influencing council policy on such critical matters as how the Council makes expensive choices between measures designed to improve the health and wellbeing of our city and its residents.

(b) Park & Ride is surely miscategorised when it is placed in a section dealing with "Alternatives to private car use: Public Transport". It is widely accepted that Park & Rides tend to increase overall vehicle miles, as drivers divert from their usual routes to access them. It is also understood that they can increase air pollution in the area surrounding the park and ride development, and that they have a tendency to abstract travellers from true modes of public transport, in particular buses. It is difficult to understand why Park & Ride is identified as a potential measure here, or elsewhere in the consultation, when measures to improve bus frequency, reliability and pricing are given scant attention.

2. Under the Transport Planning & Infrastructure section, section F, the only proposal relates to the A36/A46 Link Road, whose feasibility is assessed as Medium and likely impact on Air pollution as High. We consider both prognoses to be optimistic (or at the very least premature) and find it dispiriting that the "one trick pony" of a Link Road comprises the limit of the Council's ambition in this section. There is currently no evidence base to suggest that this hugely expensive capital project will achieve the results which have been casually attributed to it by the Council. There is no current understanding of the HGV and LGV vehicle movements into, through and out of the city, no analysis of the impact of suppressed vehicle demand which a reduction of freight vehicles on the London Road would unleash, (particularly in the absence of demand suppressants elsewhere such as CAZ and strict parking controls, which the Council has failed to grapple with effectively in its most recent parking strategy), no understanding of the extent to which freight congestion on the London Road is in fact caused by stationary and slow moving private vehicular (school run?) traffic. To give pre-eminence – indeed sole billing – to such a hugely expensive capital infrastructure project, whose lead time will extend long beyond the 5 year tenure of the new Air Quality Plan, is unimaginative on a charitable view, and politically motivated at worst.

(p) On page 36 of the draft Plan, the execution of a study to better understand through traffic movements in Bath is given an outcome of "Low". We disagree with this categorisation. Hard evidence of who is travelling from where, to where, at what times and in what volumes, is exactly what is required to underpin this Air Quality plan. It is the sine qua non of sensible decision making. A culture in which independent, verifiable evidence-based decision making replaces casual speculation as the basis for investment in major capital expenditure schemes must be fostered if this City is to deliver effective, value for money solutions to its air quality and congestion problems.

Annie Kilvington

On Behalf of the Bathampton Meadows Alliance

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