

21<sup>st</sup> November 2020

Cllr Dine Romero  
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Cabinet Office  
Wiltshire Council  
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Our ref: PW/PT/PW20112

Dear Cllr Romero

**Re: Clean Air Zone – Diversion of non-compliant vehicles**

I am aware that the Clean Air Zone in Bath is proposed to go live on 15<sup>th</sup> March 2021 and that while cars will now be exempt from charging, HVGs and vans that exceed emission standards will be charged to enter.

One of the inevitable effects will be to divert non-compliant vehicles on to the A350 and other roads in Wiltshire and cause a damaging effect on those towns and villages which already suffer air quality issues.

I know that your analysis concluded that the level of diverted HGV traffic would be modest, your calculation being around 13 HGVs per day diverting on to Wiltshire's roads.

That assessment required use of a range of forecasting techniques and was heavily reliant on use of your 'stated preference' survey (eliciting responses from drivers on how they thought their behaviour would change).

In respect of HGV's, you reported that 80% of HGV drivers/operators would replace their fleet to be compliant with the emission standard – hence the corresponding low number of diversions.

You concluded that the impact of the CAZ on roads to the east of Bath is expected to be overall neutral with individual changes in volumes making up at most 1% reductions or increases in daily traffic volume. Diversions on the A350 are forecast to be low, with around 1 vehicle diverting along this route per hour.

I know you are aware that my Council has always been highly sceptical of the above forecast and asked you to admit the possibility that the real impacts could be significantly worse.

To cover that eventuality, we asked that you extend your monitoring such that we could have a better understanding of wider HGV diversions, and I know that you incorporated extended monitoring in your bid to JAQU/Defra. I am also aware that the bid was rejected.

I do not believe however, that our concerns – and your responsibility to address them – have been properly dealt with.

As you are aware, accurately assessing the amount of displaced traffic is vital to understand the intended and unintended impacts of the Bath CAZ.

This is particularly important for West Wilts towns because two of the potential diversion routes for those avoiding the proposed CAZ, (Westbury and Bradford on Avon) already experience poor air quality with values above legal limits.

Both towns have a designated Air Quality Management Area. Any material displacement arising from the proposed CAZ in Bath will compound the air quality problem in these towns which has separately been deemed unacceptable by Defra.

Government guidance on displacement is clear:

*“...the introduction of a CAZ should not displace the most polluting traffic from one polluted road on to other roads, whether within **or outside** (my emphasis) the local authority area”.*

The Clean Air Zone Framework (2017) also is clear that;

*“...should a decision be taken to introduce a Clean Air Zone, a local authority will need to take account of any impacts on any AQMAs outside the Zone as well as other areas, for example through displacement of vehicles.”*

I know you will be fully aware of the above guidance on displacement and your obligation to assess the wider impacts of the proposed CAZ. This is why the monitoring and evaluation plan included monitoring in Wiltshire; not because of courtesy, but because it is necessary.

Therefore, as the promoting authority, I must press you to fulfil your responsibility to ensure the impacts of their scheme can be monitored, irrespective of JAQU/Defra's funding decision.

Yours sincerely



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