

Wiltshire Council

Passenger Transport Unit

Response to B&NES Bath Clean Air Zone Consultation

Whilst Wiltshire Council's Passenger Transport Unit agrees that air pollution from road traffic is a serious issue, and that measures need to be taken to reduce it, we are concerned that some aspects of the proposed Clean Air Zone in Bath will have a significant negative effect on residents and businesses in Wiltshire.

Simply moving the problem to someone else's area isn't acceptable, whilst insisting on Euro6 engines for buses which will spend only a small percentage of their time within the CAZ has the potential to reduce the viability of the very services which offer the best opportunity to reduce both pollution AND congestion.

Public Transport

The economics of bus operation outside urban areas is fragile and each additional cost places strain on bus companies. The offer to retro-fit equipment to older buses to make them CAZ compliant is recognised, but details of the scheme seem rather vague and are meeting with a less than enthusiastic response from some of our operators. It is a matter of serious concern that no clear funding stream has yet been identified for this work.

Commercial bus services

Faresaver and First both operate commercial bus services from Wiltshire into the proposed CAZ. Whilst First are committed to providing CAZ compliant buses, we understand that Faresaver are far less convinced, which presents a threat to routes from Chippenham, Devizes and Colerne to Bath. One of several possible scenarios could arise if these routes were withdrawn, all of which would cost Wiltshire Council in terms of financial support to replace the missing link(s) and could present a very unattractive service to the passenger, potentially even encouraging car use into Bath. We are also concerned that the funding for conversion will not cover on-going costs, nor will it cover a level of spare vehicles to maintain the current level of service.

One effect of the CAZ could be a significant modal switch, as people decide that the CAZ fee and parking charges together make public transport a viable alternative. With no Park & Ride sites on the Wiltshire approaches to Bath, that means by train or bus, throughout. This might seem to be good news for the bus operators, but with scarce resources (especially drivers,) they may choose to abandon the less remunerative, outer most, parts of their routes from Bath. Wiltshire Council has no funding available to procure a bus service between Warminster and Salisbury, or Devizes (possibly Melksham) and Urchfont which would be at risk in such a scenario.

We are also concerned that the fitting of such equipment will be a burden to operators for years to come, until Euro 6 has become the "standard". Suppose a route needs 4 single decks and 2 double decks at the time of implementation, what happens if, a year down the line, passenger growth is such that 2 of the single decks now need to be double decks? We assume that there would be no funding for conversion of the extra double decks. Mid-life Euro6 buses aren't available, so the operator has either to convert at his own expense, or buy new, neither of which might be financially possible, despite increased patronage. The market value of the surplus converted single decks is also an unknown; will they be sought after, or worthless? These uncertainties are causing much concern for Faresaver, which is a family business.

Council supported bus services

Wiltshire Council supports many local bus services which the market does not provide on a commercial basis. In terms of daily (Mondays to Saturdays) services offering a range of journeys there is only one route which passes into the CAZ, service 94 Westwood – Bath. The current contractor, Libra Travel, has a fleet replacement policy which allows him to purchase a new bus for the contract, which will be of Euro6 standard and delivered well before the CAZ is implemented. This is, however, a very unusual position for a small, independent, operator.

There is also a college days only service, which takes agricultural students to Wiltshire College Lackham which currently starts at Grand Parade. The contract for this journey then has the bus continuing to work all day on local journeys within Wiltshire before returning to Bath in the evening. This service would be curtailed at Batheaston, inconveniencing those agricultural students living in Bath (five individuals, on our most recent surveys).

Finally, Wiltshire Council also procures several Shoppers' Buses, one of which runs Mondays to Fridays and the others run on just one day a week. By their nature these are worked by older/ spare vehicles. The viability of these routes (in terms of subsidy per passenger journey) is already precarious as they will need to be converted to low-floor/ easy-access vehicles from 1st January 2020 in line with the Public Service Vehicle Accessibility Regulations. Older PSVR compliant vehicles which could be used on this work are unlikely to be suitable for Euro6 conversion and, as they are likely to have a limited lifespan, it would be hard to justify a conversion even if it was possible. It is highly likely, therefore, that these shoppers' services will either cease completely, or head for other destinations. Wiltshire Council will have no hesitation to explain the CAZ as the reason for any such service withdrawals/ changes if that is the change which tips the balance.

Education Transport

Whilst mainstream students only attend Bath schools through parental choice (which means parents are responsible for transport arrangements) there are a number of SEND pupils who attend Three Ways School in Bath. Whilst the school is outside the CAZ area, taxis and wheelchair accessible minibuses transporting students from some areas of Wiltshire will need to enter the CAZ to cross the city.

We would ask that dispensation be made for vehicles engaged on SEND school transport from Wiltshire be included in the concessions for vulnerable groups, and for the concession for BANES licenced taxis be extended to include taxis licensed by Wiltshire but engaged on SEND transport contract work for the council.

Without these concessions, we will be facing significant price increases in the contracts to transport some of the most vulnerable people in our community, and it may even prove impossible to provide transport for them. The taxi fleet in Wiltshire reflects the state of the local market and therefore are not the latest models.

It is a matter of considerable concern that this particular group of clients will be disproportionately affected by the CAZ.

Congestion

The continuing growth of traffic on Wiltshire's roads makes journey times longer and for the bus operator that means extra cost, through needing additional vehicles and drivers to provide the same frequency of service.

Some of this traffic growth is the result of a growing economy, and Wiltshire needs a vibrant economy. However, once the CAZ is implemented Wiltshire will see increased levels of traffic as drivers avoid the CAZ. This will lead to traffic pinch points becoming bottlenecks, with a negative effect on public transport, including on routes which go nowhere near Bath.

Conclusion

It is for the above reasons that we are extremely concerned that the Bath CAZ will have a negative impact on public transport users, bus operators and Wiltshire's ability to provide socially necessary transport. These effects could stretch far beyond Bath, across much of north and west Wiltshire.