

Parking Permits Consultation

Consultation Outcome Summary

24 June 2021

Revision 01

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Contents

1 Introduction	7
2 Public consultation	11
3 Consultation Response	12
4 Consultation Responses	13
5 Quantitative Results	19
6 On-line survey text responses	39
7 Summary	76
Appendix PPC1: Online Survey Questionnaire	77

Table of Figures

Figure 4-1: Basis of Interest	13
Figure 4-2: Working Status	14
Figure 4-3 How do you describe your gender?	14
Figure 4-4: Age	15
Figure 4-5: Dependent children.....	15
Figure 4-6: Do you consider yourself to be disabled?	16
Figure 4-7: Do you have (or use a vehicle with) a Blue Badge?	16
Figure 4-8: Do you live in a residents parking zone?	17
Figure 5-1: Review of Permit Proposals – How they work	22
Figure 5-2: Review of Permit Proposals – New charges.....	23
Figure 5-3: Issues Important in My Area.....	24
Figure 5-4: Reducing Pollution and Promoting Sustainability	25
Figure 5-5: Data Table, all respondents.....	26
Figure 5-6: Will proposals improve air quality.....	28
Figure 5-7: Emissions based permits postcode plot – Bath area	29
Figure 5-8: Emissions based permits postcode plot – All Bath & North East Somerset area	30
Figure 5-9: Hotel permits review postcode plot –Bath area.....	31
Figure 5-10: Medical permits review postcode plot –Bath area	32
Figure 5-11: Visitor permit charges postcode plot –Bath area	33
Figure 5-12: Trade permit charges postcode plot –Bath area.....	34
Figure 5-13: Importance of air quality postcode plot –Bath area	35
Figure 5-14: Behaviour change needed to address air pollution postcode plot –Bath area.....	36
Figure 5-15: Councils have an important role in reducing air pollution postcode plot –Bath area	37
Figure 5-16: Vehicles should pollute less postcode plot –Bath area	38
Figure 6-1: Number of individual comments from by respondents per question	39

1 Introduction

1.1 Background

1.1.1 Air quality, managing traffic flows and availability of parking are all significant issues in our region, particularly in the city of Bath. Whilst these proposals detailed in this report are a separate standalone scheme, they are complimentary to other projects aimed at addressing these issues, including the following:

- Promoting a major shift to mass transport, walking and cycling, with incentives to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy
- Improving the safety of cyclists and pedestrians through active travel schemes which rebalance priorities on our roads and build on social distancing needs
- Introducing a Clean Air Zone in central Bath, to encourage less polluting ways of travelling around the city
- Reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods, aligning with our policy and work on Liveable Neighbourhoods.

1.2 Proposals

1.2.1 This consultation is about new proposals for how we manage controls for on-street parking in our area. We have drawn up new terms and conditions for the range of parking permits that we issue, monitor and control as a council, and we asked for feedback from local people on the following proposals:

A. Emissions based charging for residents parking permits

- Charges for resident permits to be based on the CO2 emissions of the vehicle using the existing bands classified for Vehicle Excise Duty (VED), or 'car tax'.
- The baseline prices under the proposals are equivalent to existing permit prices in Bath. A first permit is £100 per year, with a second permit at £160 per year. This baseline is set at CO2 emissions of 111-130g/km, including 44% of all existing permits. The proposed price increases by 5% for each subsequent and higher emissions band
- A diesel supplement is proposed to compliment the work to achieve NO2 targets in the shortest possible time. The price for a permit for a diesel fuelled vehicle contains a 25% surcharge on top of the basic price based on CO2 emission alone. On a baseline price this surcharge would be £25 and £40 for the first and second permit respectively.

- Proposed prices are to be applied consistently to all residents parking zones across Bath & North East Somerset to ensure they are fair with more polluting vehicles set higher based proportionately on their emissions.
- Residents will be required to provide all Vehicle Registration Marks (VRM) in their household that may use the permit at the point of purchase (subject to a maximum of four vehicles per permit). Once a permit is issued changes must be staff mediated and will incur an administration charge of £10. This change is subject to the new vehicle being equal to or less polluting than the highest polluting vehicle pre-registered against the permit.

B. Review of Hotel permits

- All existing permits for hospitality businesses combined into a single permit type and digitised within MiPermit – removing the need to renew, manage and display a paper permit.
- Permit only provides parking in council long stay car parks, removing vehicles from residential areas.
- Charges for guest parking are brought in line with the daily charge for visitor parking in council car parks, this is currently at £15 per day. Businesses will only pay for parking when they activate a permit stay for a guest and may be passed on to guests at the discretion of the business.
- As with all other parking on-street and in council car parks, the activation of a permit stay does not provide reserved parking and access to a parking space will be dependent on availability within any long stay car park.

C. Review of Medical permits

- Medical permits to be separated into a Medical and a Social Care permits and digitised within MiPermit. To be available to healthcare professionals treating residents in their own homes.
- Initial application only required, with account holders able to renew annually via self serve with no further authorisation required. Current medical permit costs are £60, the new annual charge will be linked to the baseline cost of a residents permit, currently £100.

- When needed, a free 2-hour parking permit stay must be activated online each time the permit is used using the MiPermit app, website, or text service. Online parking permit activation can be managed centrally by a practice or business, or individual staff members can do it.

D. Review of Visitor permits

- Introduction of half day paper permits in zones where paper permits are available to provide greater flexibility to those that cannot use digital permits and avoid using a whole day permit for shorter visits.
- Includes a modest increase in daily charges for visitor parking, the first time we have done this since 2013. Increases will be phased in over three years, with a 50p per day rise in year one, followed by 25p per day rises in years two and three.

E. Review of Trade permits

- Trade permits allow trade persons or landlords to park in any permit holder's bay or pay and display bay on street or in car parks across Bath. Within pay and display areas, holders can activate and pay for parking stays that are longer than the maximum stay period at any location.
- Existing charges for the Central and zone 1 (inner zones) are £3 per hour, with all other residential zones (outer zones) charged at £6.60 per day.
- We are proposing modest price increases for inner zone trade permit activations to bring them in line with proposed on street parking charges equivalent to our second tier areas, which include premium locations such as Walcot Street, Queens Square and St James Parade in central Bath.

Proposed Trade Permit price increases			
Parking Zone	Year 1	Year 2	Year 3
Central and Zone 1 (hourly charge)	£3.50 (£28 max/day)	£3.60	£3.70
Outer zones (daily charge)	£7	£7.50	£8

1.2.2 New terms and conditions have been drafted and included in the consultation to reflect the changes proposed and explain how each permit type works at an operational level and includes:

- Where the permits will apply

- Who each permit is for
- How many permits you may be eligible for
- How to buy, renew and activate or use a permit
- Any prohibitions or limits on permit use
- What each permit will cost

1.2.3 Stakeholders were invited to indicate how reasonable they feel these terms and conditions are and provide further comment as appropriate.

1.3 Structure of the report

1.3.1 The following sections of this report are set out as follows:

- section 2 summarises the public consultation activities;
- section 3 provides a summary of the responses;
- section 4 sets out the respondents' characteristics;
- section 5 provides a summary of the quantitative results from the on-line survey;
- section 6 provides a summary of the free text comments made by individuals via the online survey;
- section 7 provides a general summary.

2 Public consultation

- 2.1.1 The first stage consultation was held between 27 April and 24 May 2021 and publicised digitally via the council's website; twitter account; press release; the Council's Interagency Network; CCG newsletter, and direct contact via email with Residents Associations; expressions of interest; and over 8,000 permit account holders.
- 2.1.2 A web-based questionnaire was developed to seek views on the proposals. A copy of the survey questionnaire is provided as Appendix PPC1.
- 2.1.3 Questions were designed to minimise any bias or loading of respondent's answers.
- 2.1.4 Respondents were directed to the online consultation form to provide their feedback or could be provided with a paper copy to complete and send in upon request.
- 2.1.5 Due to Covid-19 restrictions no public-facing drop-in events were held. Any queries were directed to a dedicated consultation email address: Parking_consultation@bathnes.gov.uk.

3 Consultation Response

3.1 Feedback generated

- 3.1.1 The online survey generated a total of 1,086 individual responses including 15 responses sent by post which were transposed into the online survey.
- 3.1.2 The consultation analysis has involved both quantitative and qualitative data. Quantitative data was gathered through multiple choice or single answer questions producing numerical results. Qualitative data was gathered through nine open-ended questions for additional comments and suggestions.

3.2 Quantitative analysis

- 3.2.1 Section 4 provides a profile of respondents, whilst section 5 provides a summary of the results relating to opinion questions on the proposals.

3.3 Qualitative data analysis

- 3.3.1 The more detailed, qualitative feedback generated from questions is summarised in sections 6 and 7.

4 Consultation Responses

4.1 General Characteristics

4.1.1 The on-line survey asked respondents to provide general information relating to their individual characteristics. The results are provided in Figure 4-1 to Figure 4-8.

4.1.2 Respondent type

97% of respondents were replying on behalf of themselves, with 3% responding on behalf of organisations.

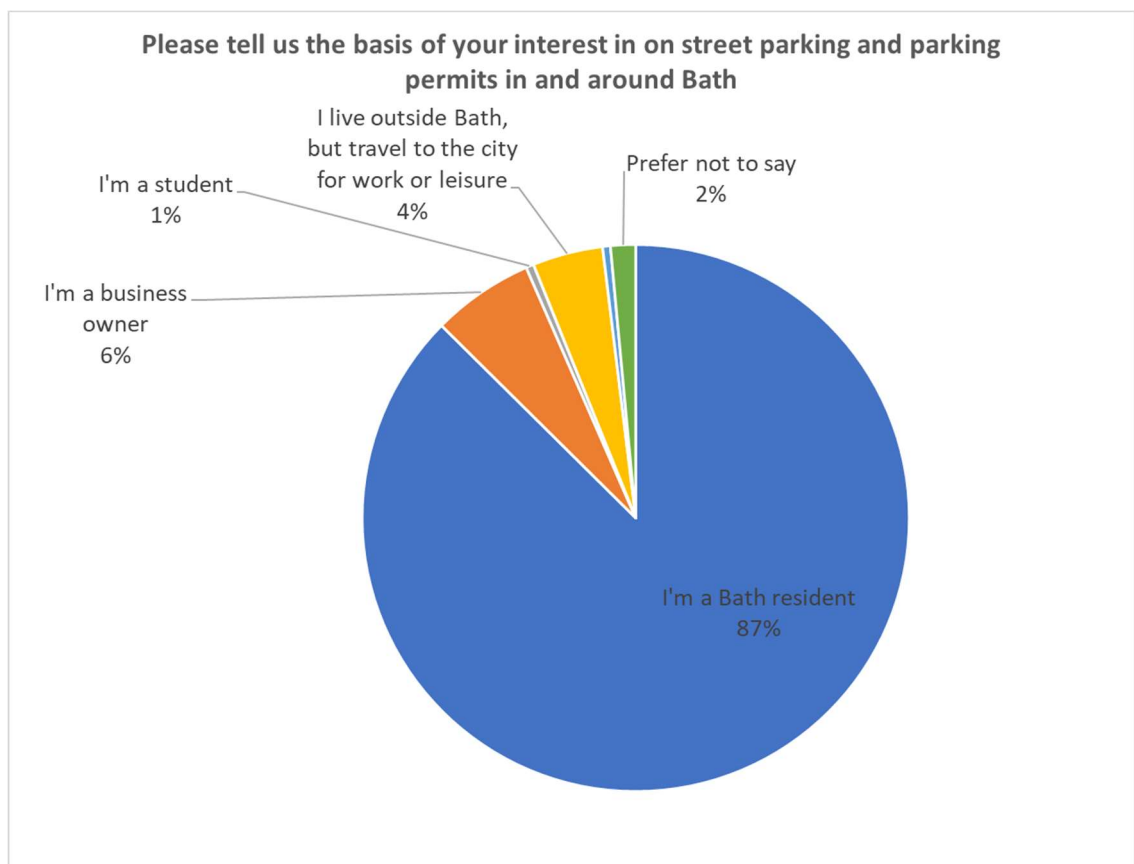


Figure 4-1: Basis of Interest

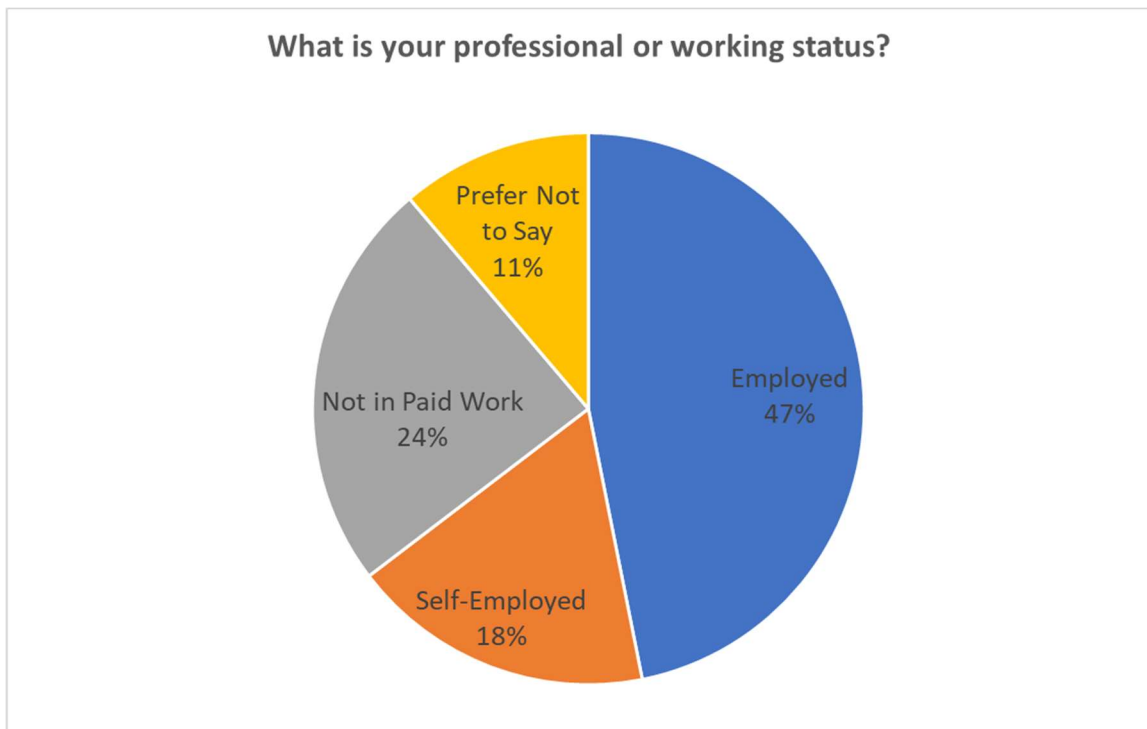


Figure 4-2: Working Status

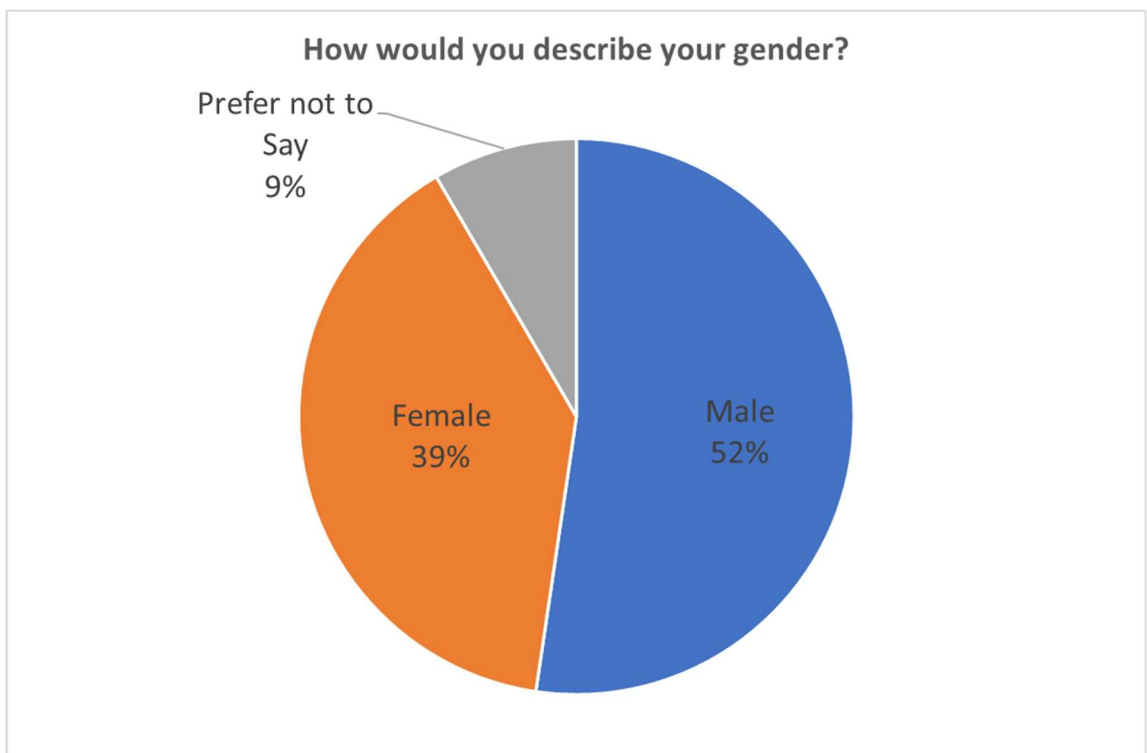


Figure 4-3 How do you describe your gender?

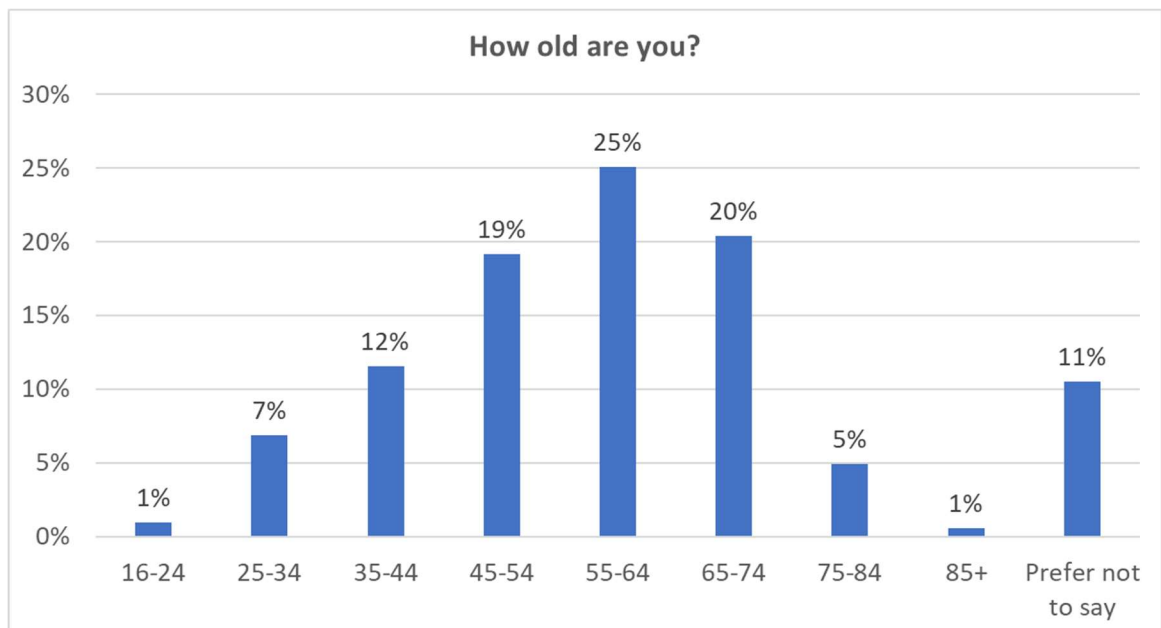


Figure 4-4: Age

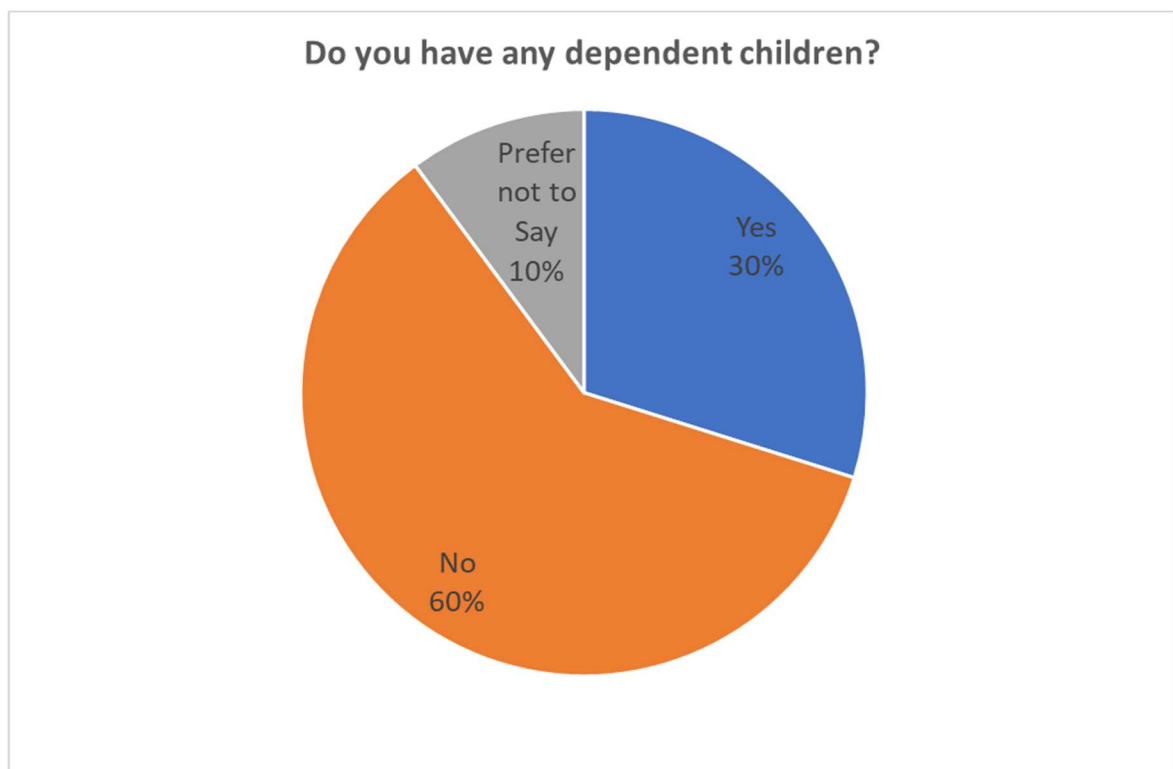


Figure 4-5: Dependent children

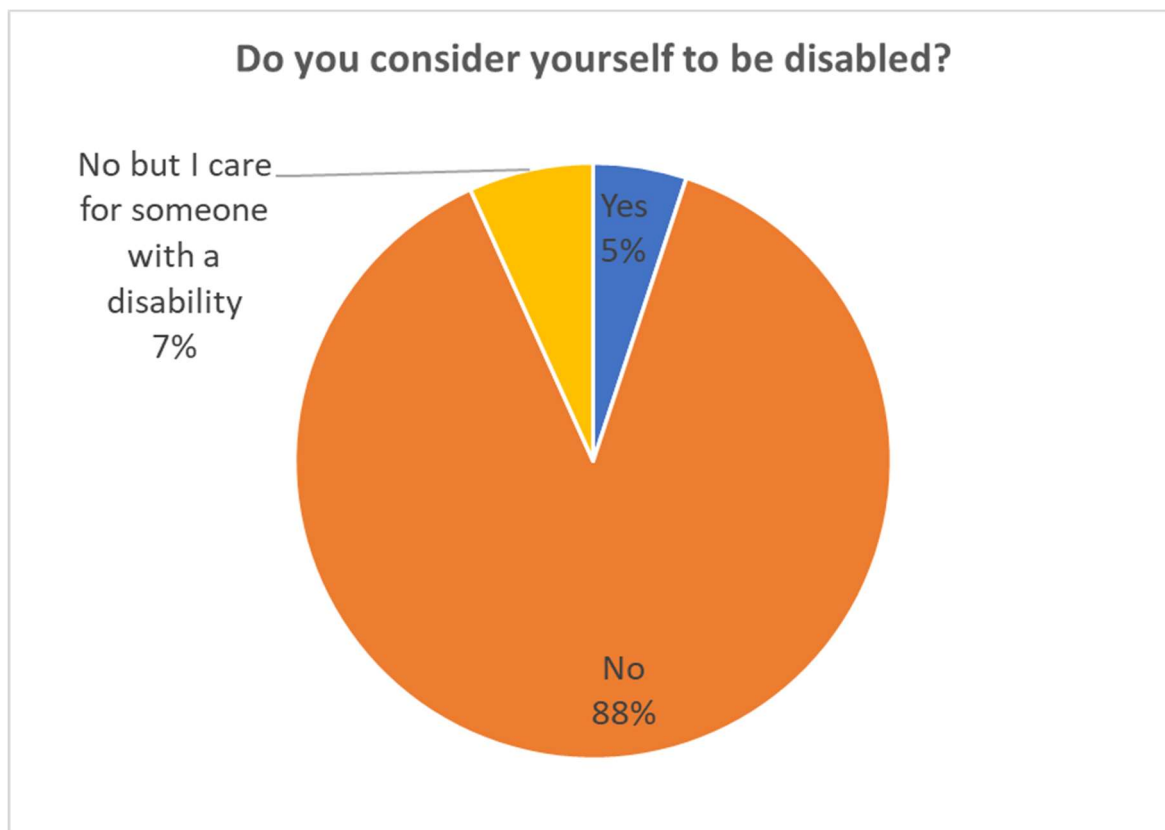


Figure 4-6: Do you consider yourself to be disabled?

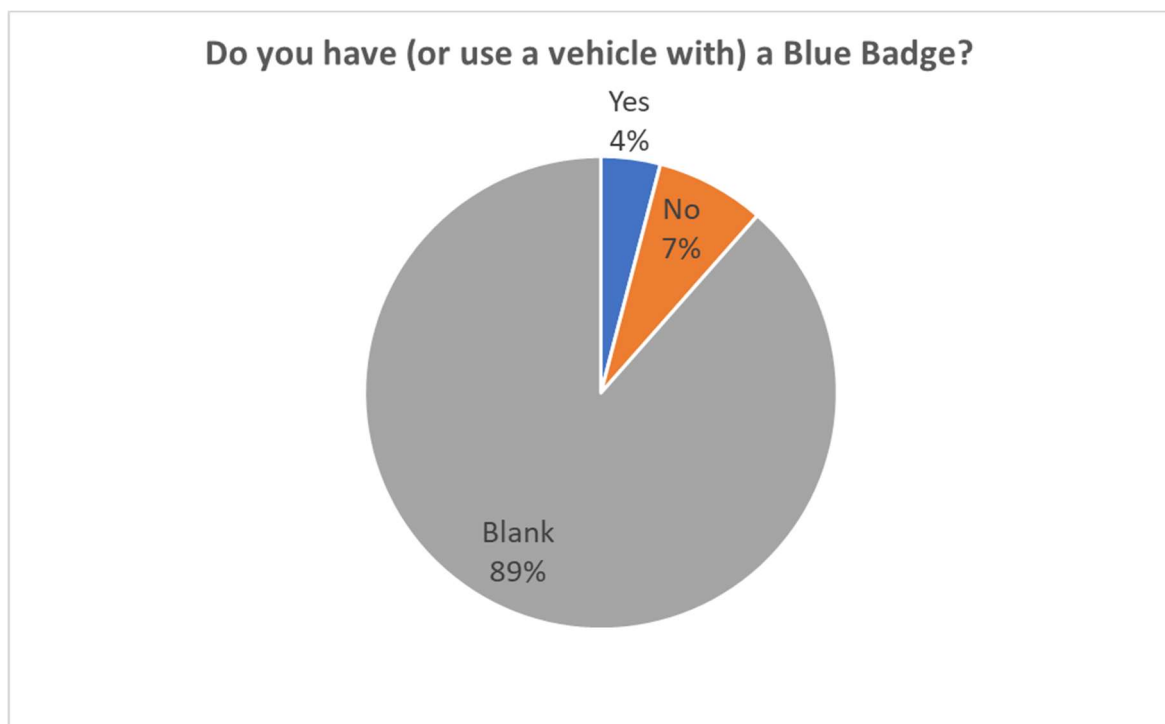


Figure 4-7: Do you have (or use a vehicle with) a Blue Badge?

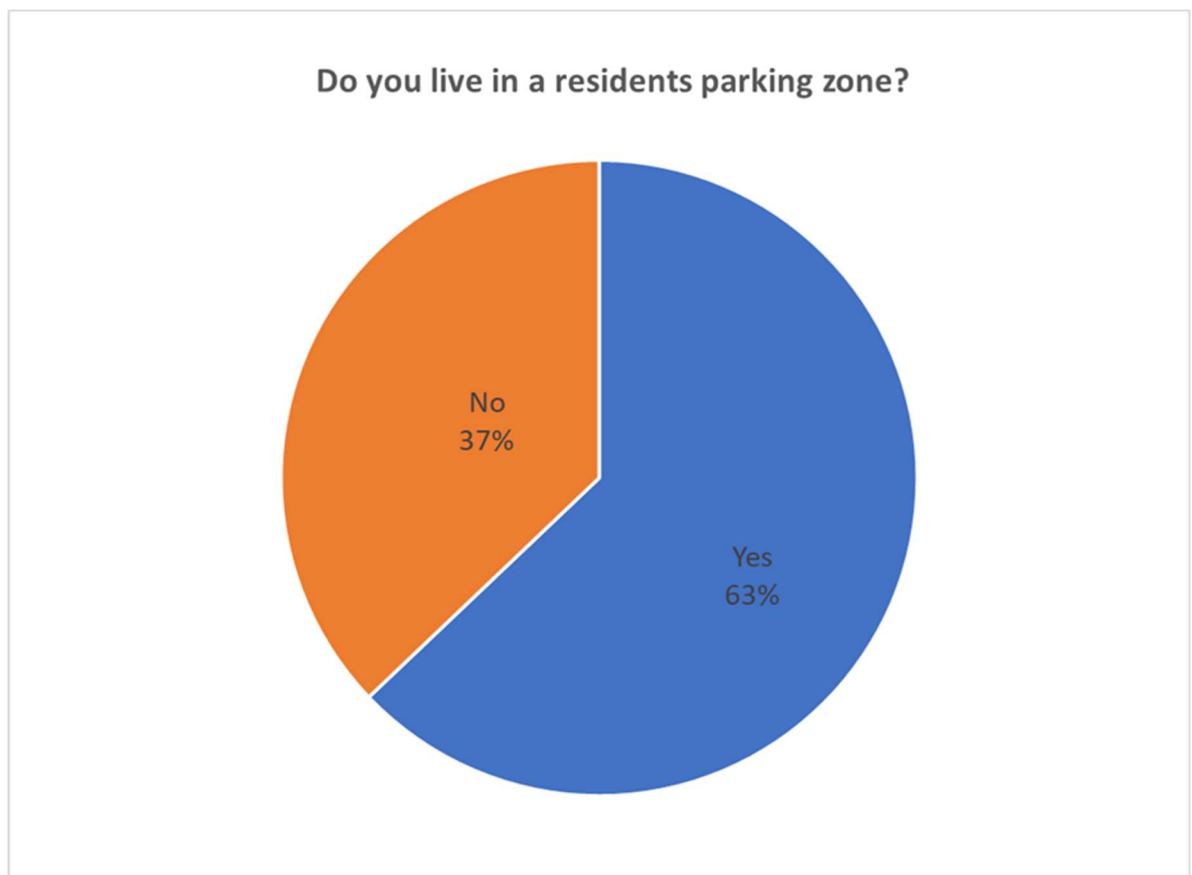


Figure 4-8: Do you live in a residents parking zone?

4.2 Response distribution

- 4.2.1 Figure 4-1 indicates that the overwhelming number of responses were from residents, students or business owners from within Bath (88%), with only 4% declaring they live outside the city. 6% of respondents declared they were business owners and not residents; however, a review of the quantitative data indicates that some respondents felt they fell into more than one category, for example “I’m a Bath resident and also a business owner in Bath”. It would have therefore been beneficial to have provided a higher number of separate groups, particularly as the different proposals impact different groups in different ways.
- 4.2.2 Figure 4-4 indicates that 70% of respondents are over the age of 45 with 51% over the age of 55. The 2011 census indicates that 43% of the B&NES adult population are over the age of 45 and 30% are over 55. It’s worth noting that this census data is 10 years old, the 2021 census data is not yet available.

Even accounting for the aging population in this 10 year period since the last census, and assuming there has not been a large movement of the population into or out of B&NES, the results indicate a disproportionate response rate amongst the over 45s than exists in the population. This is further evidenced by the low response rate of 1% amongst the under 25’s, who comprise 16% of the B&NES population and are an age group with low car availability.

- 4.2.3 Figure 4-5 indicates that 30% of respondents have dependent children. This is lower than the proportion of B&NES households who have dependent children (source: ONS), at 40%, and is a further indicator of a disproportionate response rate from older age groups.
- 4.2.4 Figure 4-6 indicates that 5% of responses considered themselves to be a disabled person. This is an under-representation of the population, with 16% of the B&NES population having a long-term health problem or disability (source: ONS).
- 4.2.5 Figure 4-8 indicate a higher number of responses, 63%, from those living within residents parking zones, and therefore directly affected by proposals which may increase their permit costs.

4.3 Participation in future travel studies

- 4.3.1 51% of respondents stated that they would be prepared to take part in future studies of travel habits and provided email and telephone contact details.

5 Quantitative Results

5.1 Background

- 5.1.1 The consultation questionnaire included 13 specific questions in a Likert format. 7 questions covered their views on specific issues within their area related to air quality and parking, with the remaining 6 covering the proposals specifically.
- 5.1.2 Respondents were able to respond to questions relating to just one or multiple proposals.

5.2 Presentation of results

- 5.2.1 Figure 5-1 to Figure 5-4 present the results of these 13 questions as stacked bars with 'support' and 'strongly support' shown as positive percentages (in light green and dark green respectively) and 'don't really support' and 'strongly disagree' shown as negative percentages (in pink and red respectively). Respondents who replied 'no strong opinion' are not shown in the charts, but included within Table 5.1 which shows the full results
- 5.2.2 Figure 5-1 shows the results of the feedback on the new permit proposals and includes emission-based residents permits; changes to hospitality guest parking; changes to medical permits and the wider permit terms and conditions.

5.2.2.1 *Emissions based resident permit feedback*

The strength of feeling among respondents for the emissions-based proposals is split; however, there is a majority (51% vs 40%) who do not support the proposals. It's important that this result is considered in the context of the results shown in Figure 5-3 and Figure 5-4 (see paragraphs 5.2.4 and 5.2.5).

Analysis of the data from only those respondents who declared they lived within an RPZ (63% of the total) showed comparable results.

5.2.2.2 *Hotel permit feedback*

There was clear support for this proposal with 44% of respondents expressing their support versus 25% against. 31% expressed 'no strong opinion'.

5.2.2.3 *Medical permit feedback*

There was clear support for this proposal with 45% of respondents expressing their support. 36% expressed 'no strong opinion'.

5.2.2.4 *Terms and conditions feedback*

There was clear support for this proposal with 39% of respondents expressing their support versus 31% of those that did not support it. 30% expressed 'no strong opinion'.

- 5.2.3 Figure 5-2 shows the results of the proposals to increase costs for both visitor permits and trade permits. Strength of feeling amongst respondents is evenly matched in both questions; however, overall the opinion is against the proposals by 5% and 6% respectively. It should be noted that in both questions the number of 'no strong opinion' responses was high at 21% and 34% respectively and is the favoured single response by the majority of respondents.
- 5.2.4 Figure 5-3 shows overwhelmingly that respondents are passionate about air quality with 69% agreeing that air quality in their areas is important to them. A majority of respondents feel that congestion/noise and parking availability is an issue in their area, however, this was less overwhelming with support to these issues being 42% and 51% respectively.
- 5.2.5 Figure 5-4 presents the results of the questions regarding reducing pollution and promoting sustainability. Support ranges from 58% to 62% across all four questions, which mirrors the passion shown by respondents to the importance of air quality showing a clear correlation to how important this issue is locally.
- 5.2.6 The results from questions about respondents' views on air quality contrast markedly with their feelings on the emissions-based permit proposals. This could suggest that it is the mechanism itself, which is linked to an increased charge on the polluter pays principle, that is not supported rather than the outcomes.
- 5.2.7 The results of this analysis indicated marginal differences with the results from the 'all respondent' analysis. A data table for the Bath-only responses is provided as Figure 5-5.
- 5.2.8 Figure 5-6 shows that 53% of respondents felt that the proposals would have an impact on improving air quality.

5.3 Postcode plots

- 5.3.1 Postcode plots of the results for 9 selected questions have been prepared where postcodes were provided. 90% of the 1,086 respondents provided a full postcode, with 88% of all respondents (954) within the Bath area. These plots are provided as Figure 5-7 to Figure 5-16. Due to the significant majority of respondents with postcodes coming from the Bath area (98%) most of the plots show only a zoomed in view of Bath.
- 5.3.2 The postcode plots indicate the number of responses in each full postcode area. Respondents who supported or strongly supported are combined and shown as green semi-circles. Respondents who didn't really support or strongly disagreed are also combined and shown as red semi-circles.

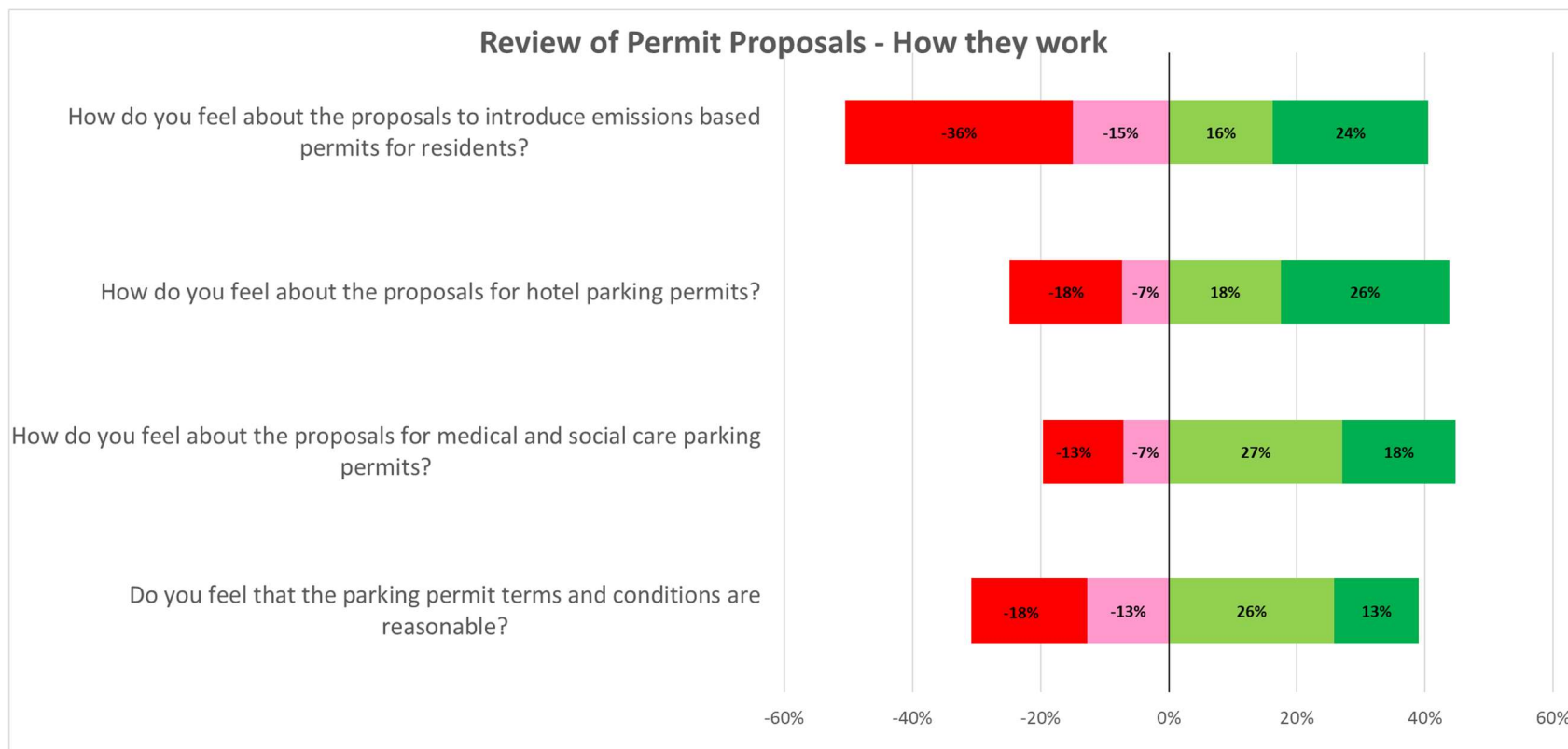


Figure 5-1: Review of Permit Proposals – How they work

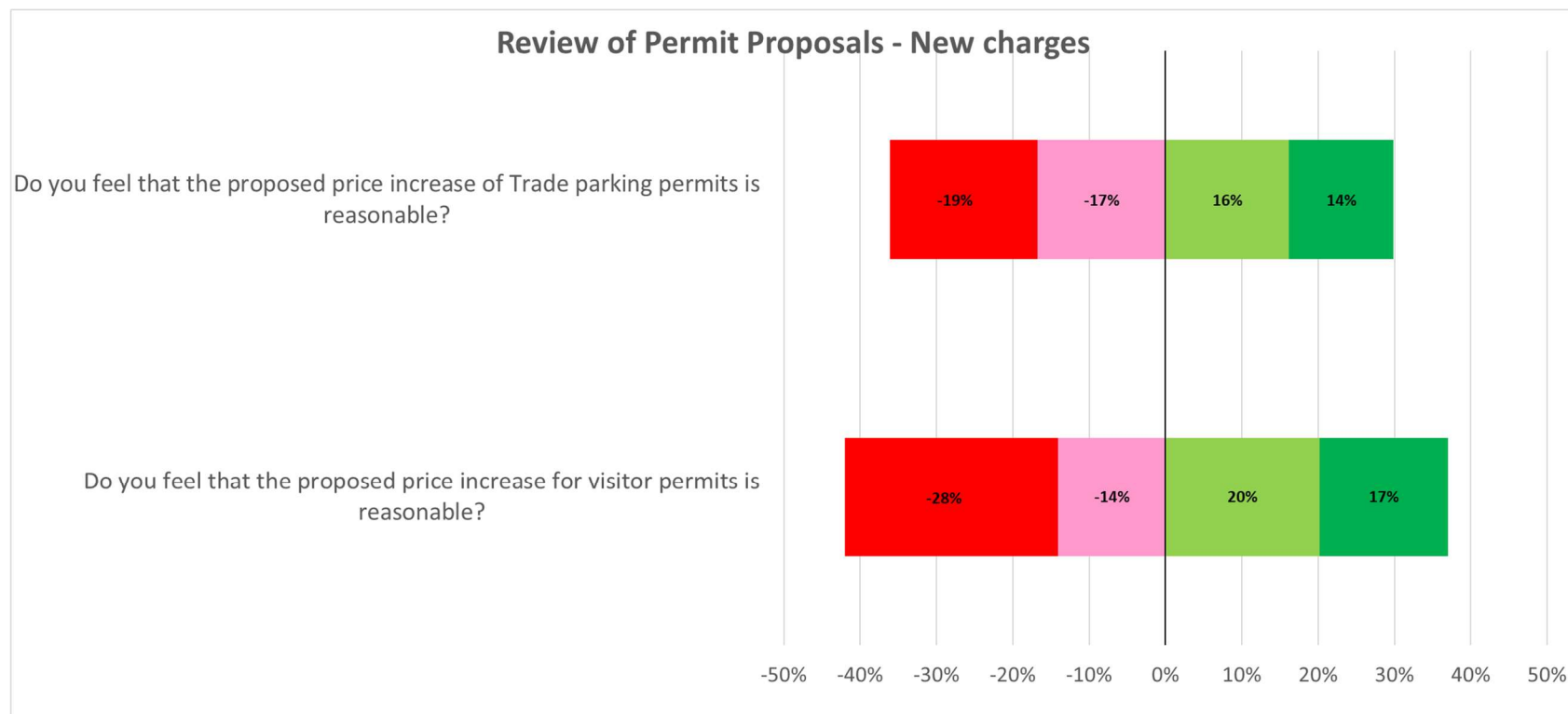


Figure 5-2: Review of Permit Proposals – New charges

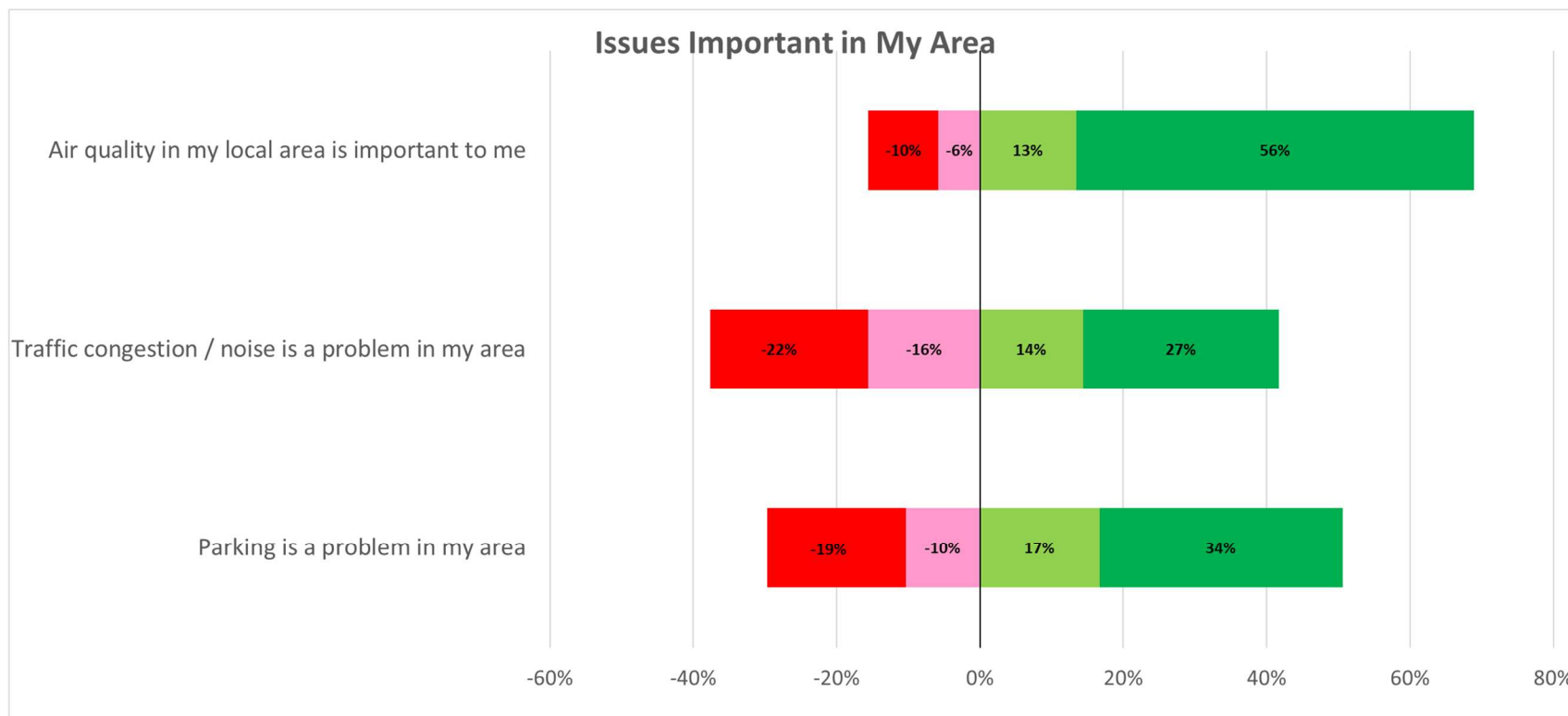


Figure 5-3: Issues Important in My Area

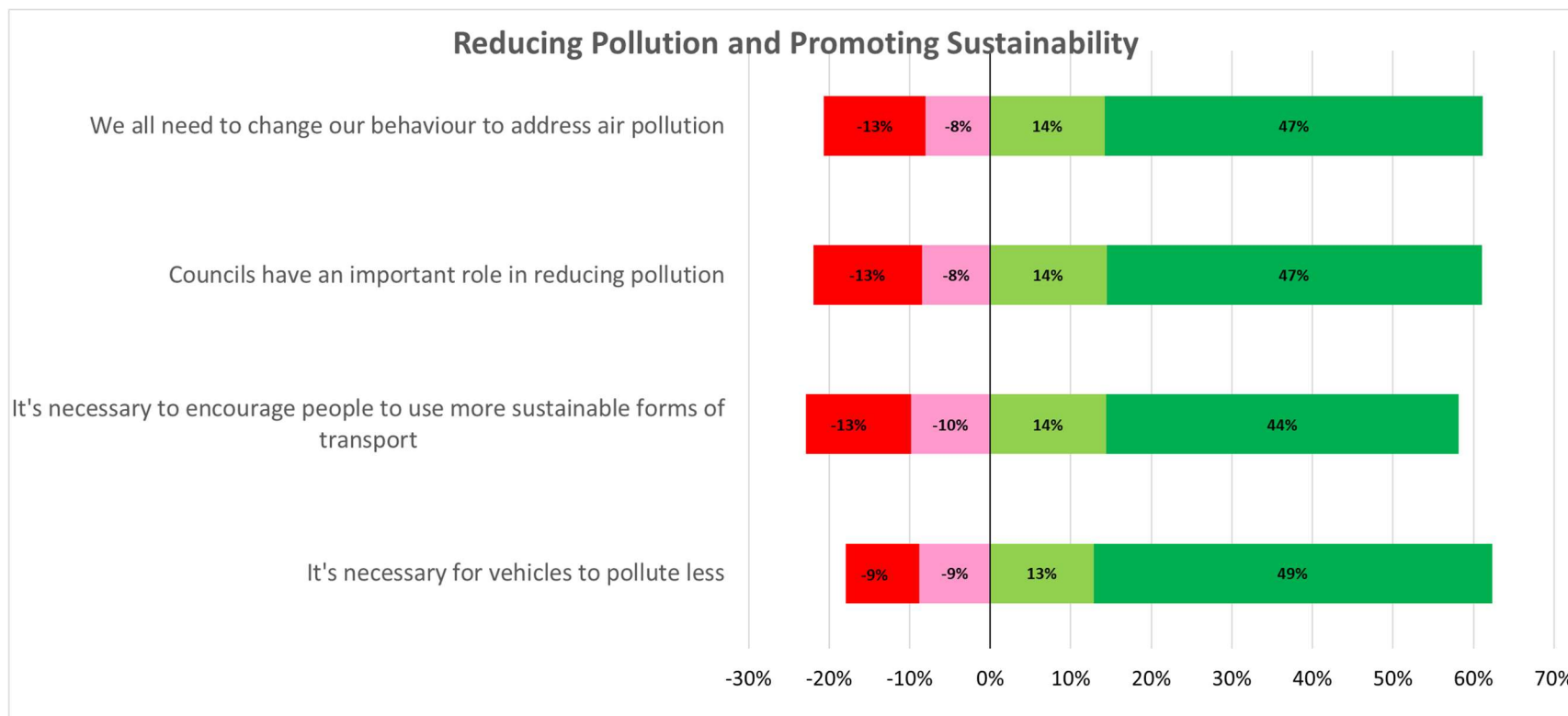


Figure 5-4: Reducing Pollution and Promoting Sustainability

	A	B	C	D	E	F	G	H	I	J	K	L	M
Number of responses													
No Response							20	25	18	22	22	25	25
Strongly Support	262	282	191	142	181	147	603	297	369	509	506	476	537
Support	175	188	291	277	217	173	146	156	181	155	157	156	140
No Strong Opinion	97	337	383	323	226	365	148	199	196	176	163	181	189
Don't Really Support	162	78	76	137	151	179	63	169	112	87	92	107	96
Strongly Disagree	384	189	135	194	301	207	106	240	210	137	146	141	99
Total	1080	1074	1076	1073	1076	1071	1086	1086	1086	1086	1086	1086	1086
Percentage of responses													
No Response	-	-	-	-	-	-	2%	2%	2%	2%	2%	2%	2%
Strongly Support	24%	26%	18%	13%	17%	14%	56%	27%	34%	47%	47%	44%	49%
Support	16%	18%	27%	26%	20%	16%	13%	14%	17%	14%	14%	14%	13%
No Strong Opinion	9%	31%	36%	30%	21%	34%	14%	18%	18%	16%	15%	17%	17%
Don't Really Support	15%	7%	7%	13%	14%	17%	6%	16%	10%	8%	8%	10%	9%
Strongly Disagree	36%	18%	13%	18%	28%	19%	10%	22%	19%	13%	13%	13%	9%
Support & strongly support	40%	44%	45%	39%	37%	30%	69%	42%	51%	61%	61%	58%	62%
Don't really support & strongly disagree	51%	25%	20%	31%	42%	36%	16%	38%	30%	21%	22%	23%	18%
Difference (supported vs not supported)	-11%	19%	25%	8%	-5%	-6%	53%	4%	21%	40%	39%	35%	42%

Figure 5-5: Data Table, all respondents

Data table key

- A How do you feel about the proposals to introduce emissions based permits for residents?
- B How do you feel about the proposals for hotel parking permits?
- C How do you feel about the proposals for medical and social care parking permits?
- D Do you feel that the parking permit terms and conditions are reasonable?
- E Do you feel that the proposed price increase for visitor permits is reasonable?
- F Do you feel that the proposed price increase of Trade parking permits is reasonable?
- G Air quality in my local area is important to me
- H Traffic congestion / noise is a problem in my area
- I Parking is a problem in my area
- J We all need to change our behaviour to address air pollution
- K Councils have an important role in reducing pollution
- L It's necessary to encourage people to use more sustainable forms of transport
- M It's necessary for vehicles to pollute less

Do you feel that our proposals will improve air quality?

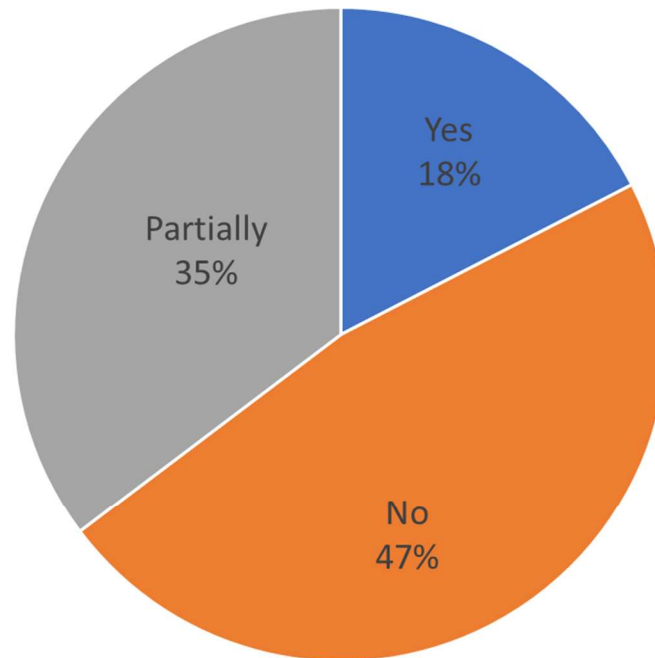


Figure 5-6: Will proposals improve air quality

2021 Parking Consultation: Results by area (District)

How do you feel about the proposals to introduce emissions based permits for residents?

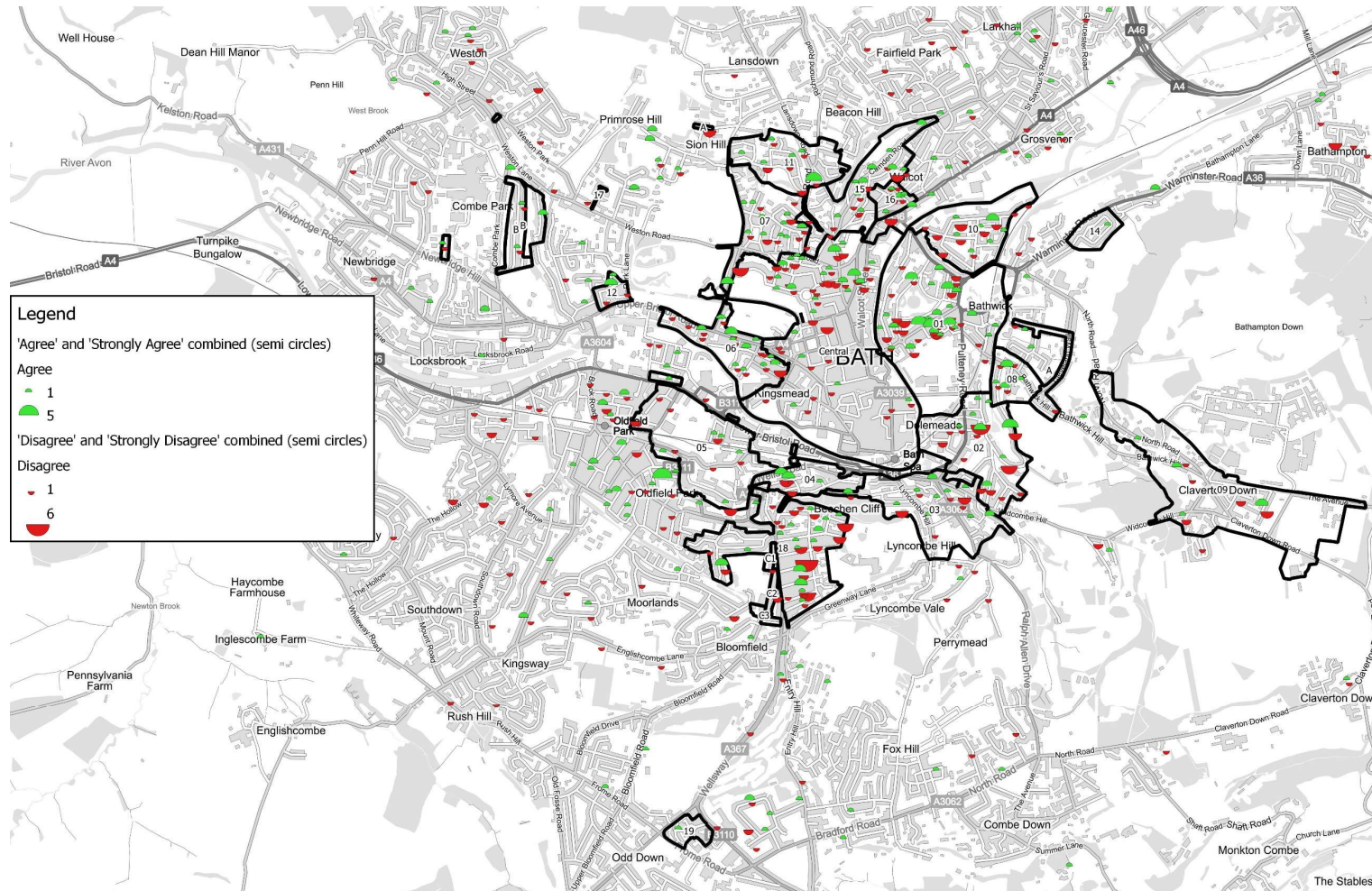


Figure 5-7: Emissions based permits postcode plot – Bath area

2021 Parking Consultation: Results by area (District)

How do you feel about the proposals to introduce emissions based permits for residents?

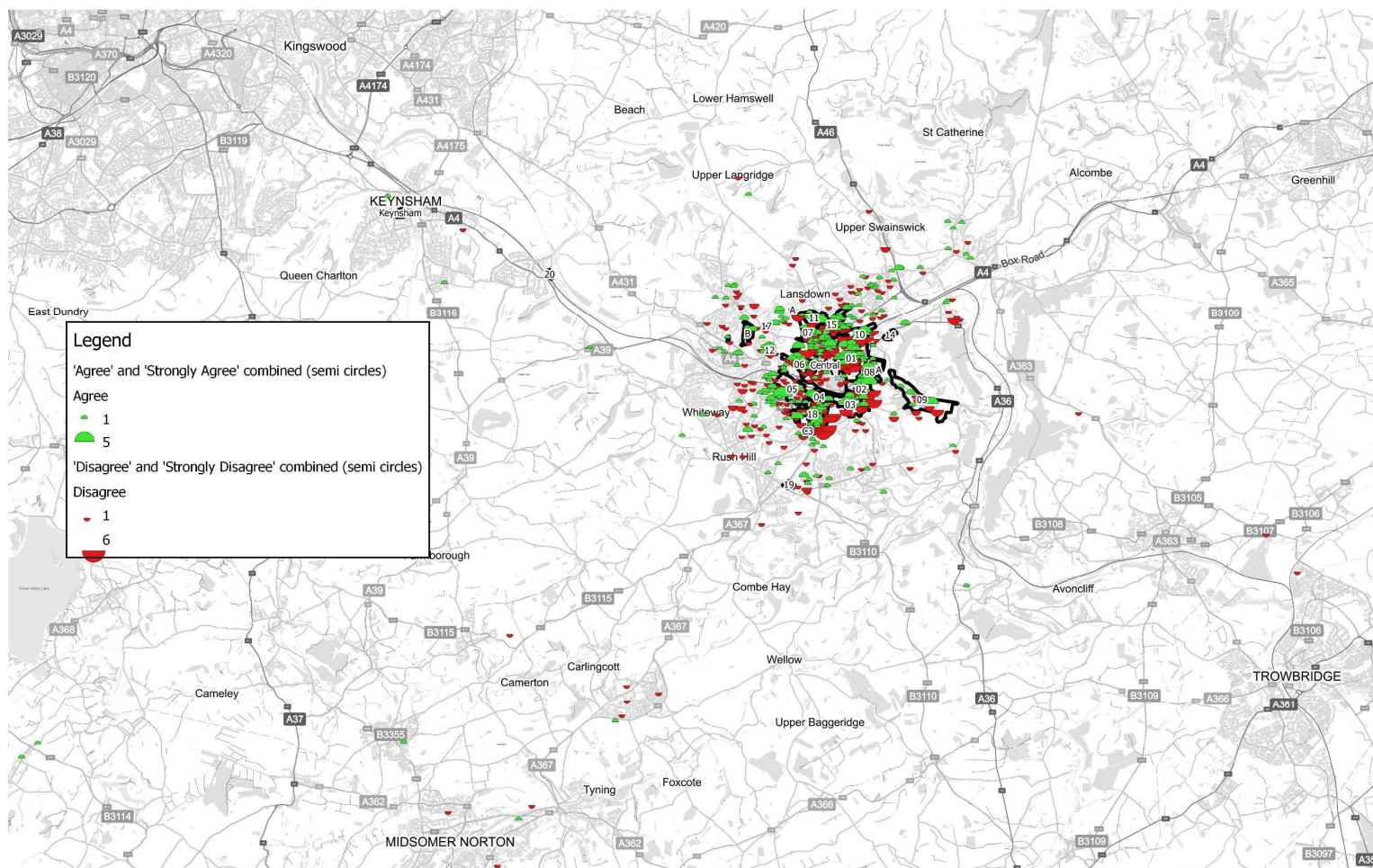


Figure 5-8: Emissions based permits postcode plot – All Bath & North East Somerset area

2021 Parking Consultation: Results by area (Bath)
 'How do you feel about the proposals for hotel parking permits?'

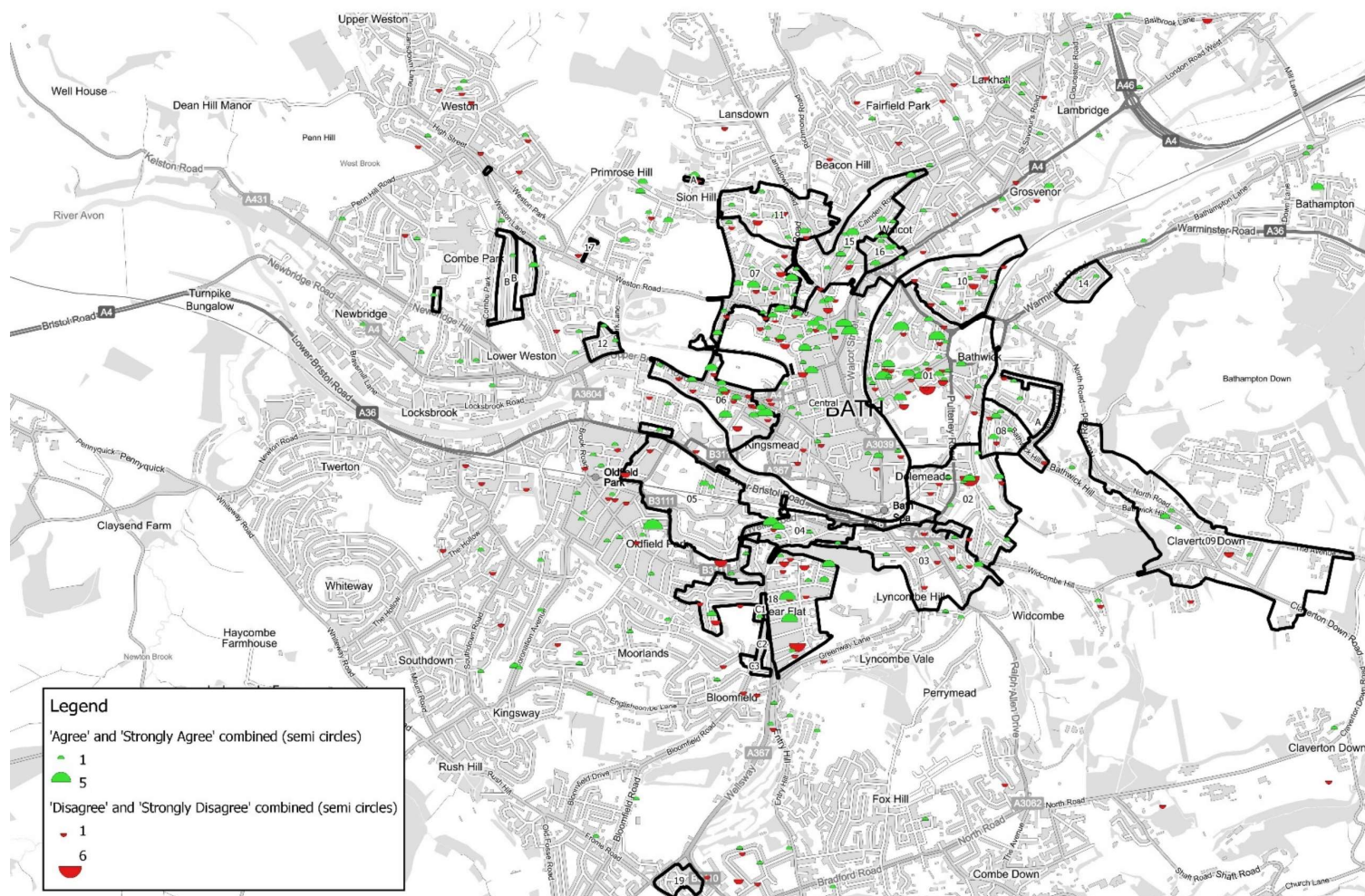


Figure 5-9: Hotel permits review postcode plot –Bath area

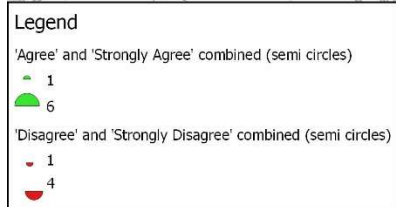


Figure 5-10: Medical permits review postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)

Do you feel that the proposed price increase for visitor permits is reasonable?

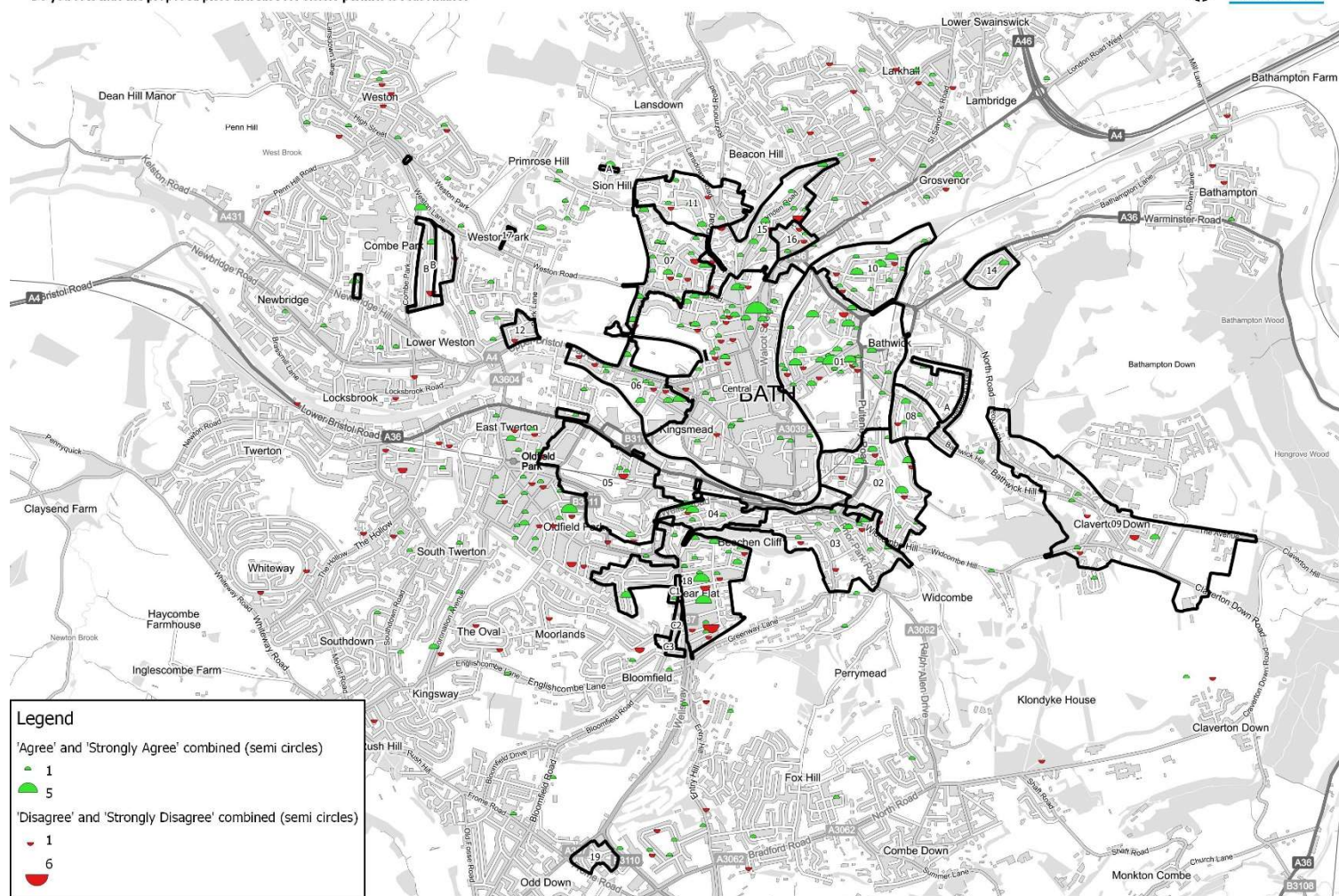


Figure 5-11: Visitor permit charges postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)

Do you feel that the proposed price increase of Trade parking permits is reasonable?

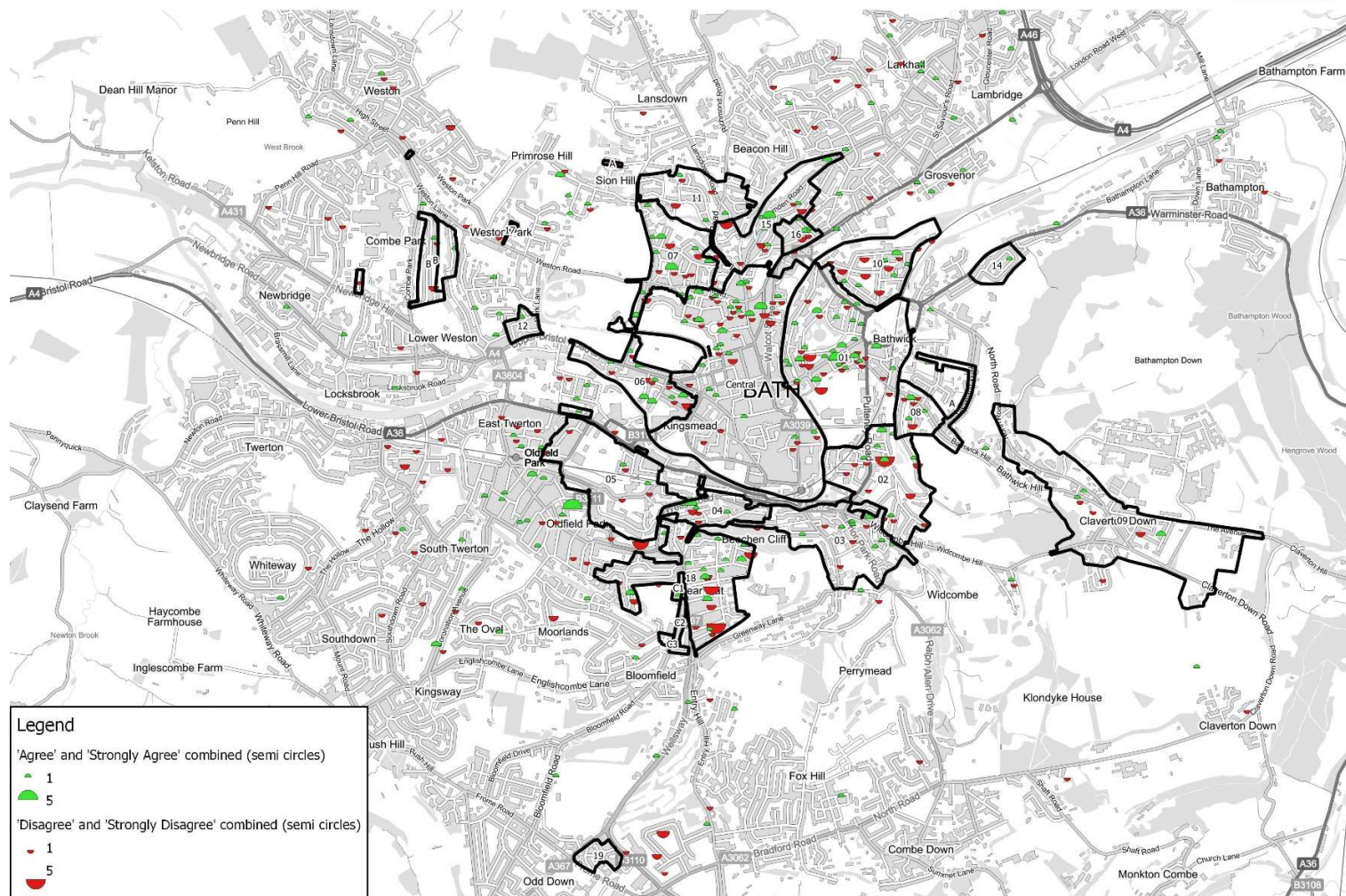


Figure 5-12: Trade permit charges postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath)

Air quality in my local area is important to me

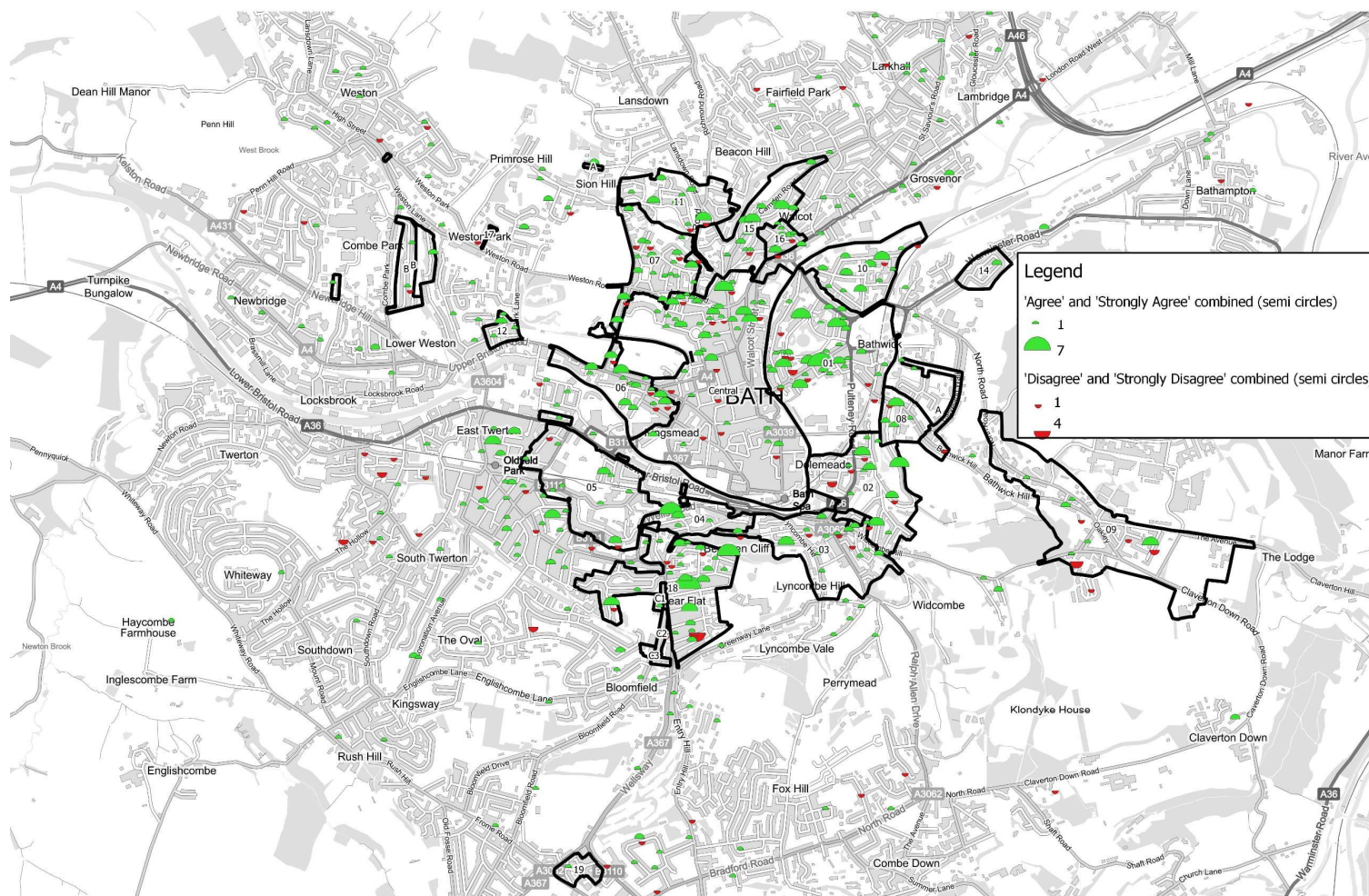


Figure 5-13: Importance of air quality postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath)
We all need to change our behaviour to address air pollution

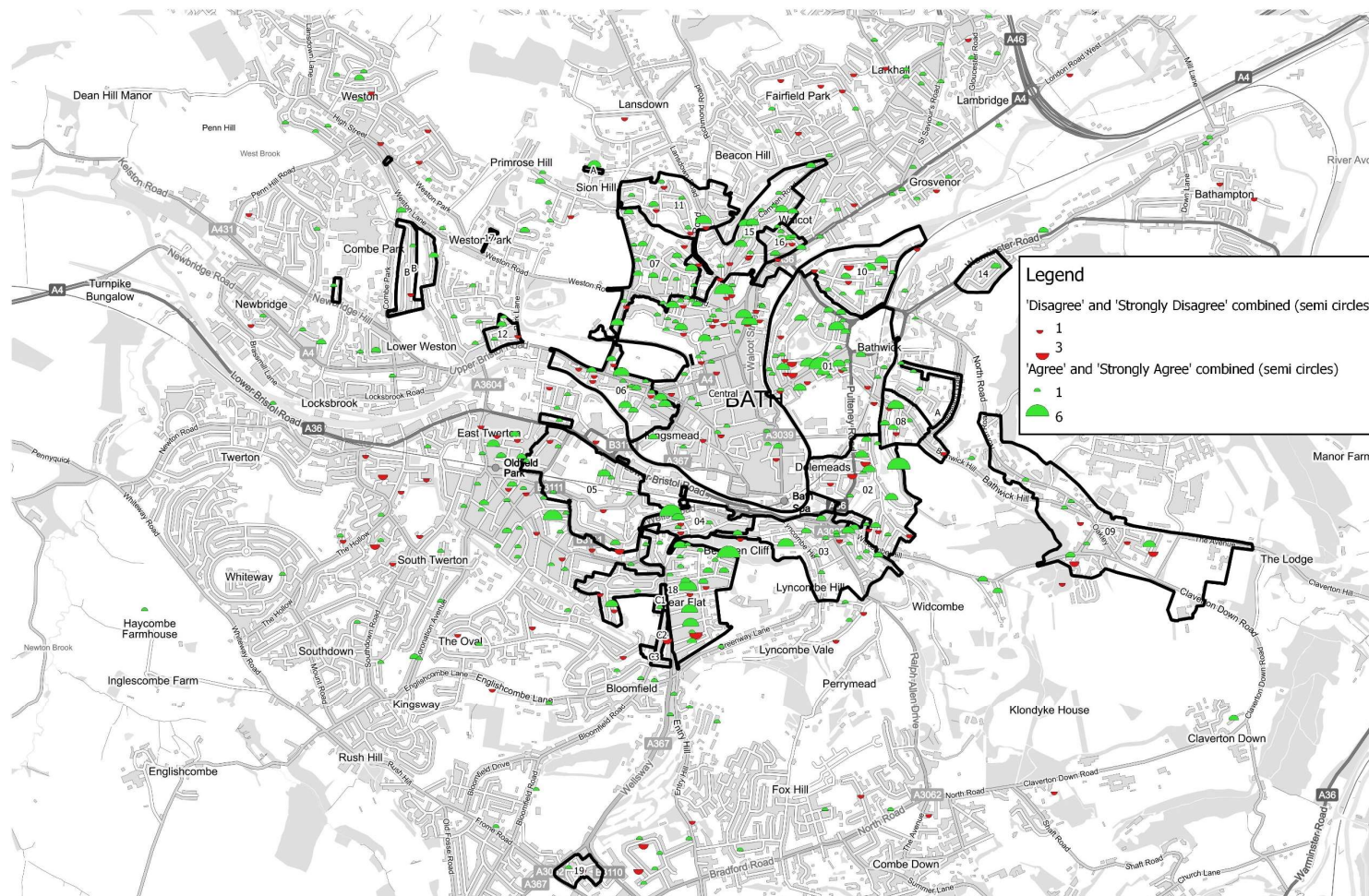


Figure 5-14: Behaviour change needed to address air pollution postcode plot –Bath area



2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)

It's necessary for vehicles to pollute less.

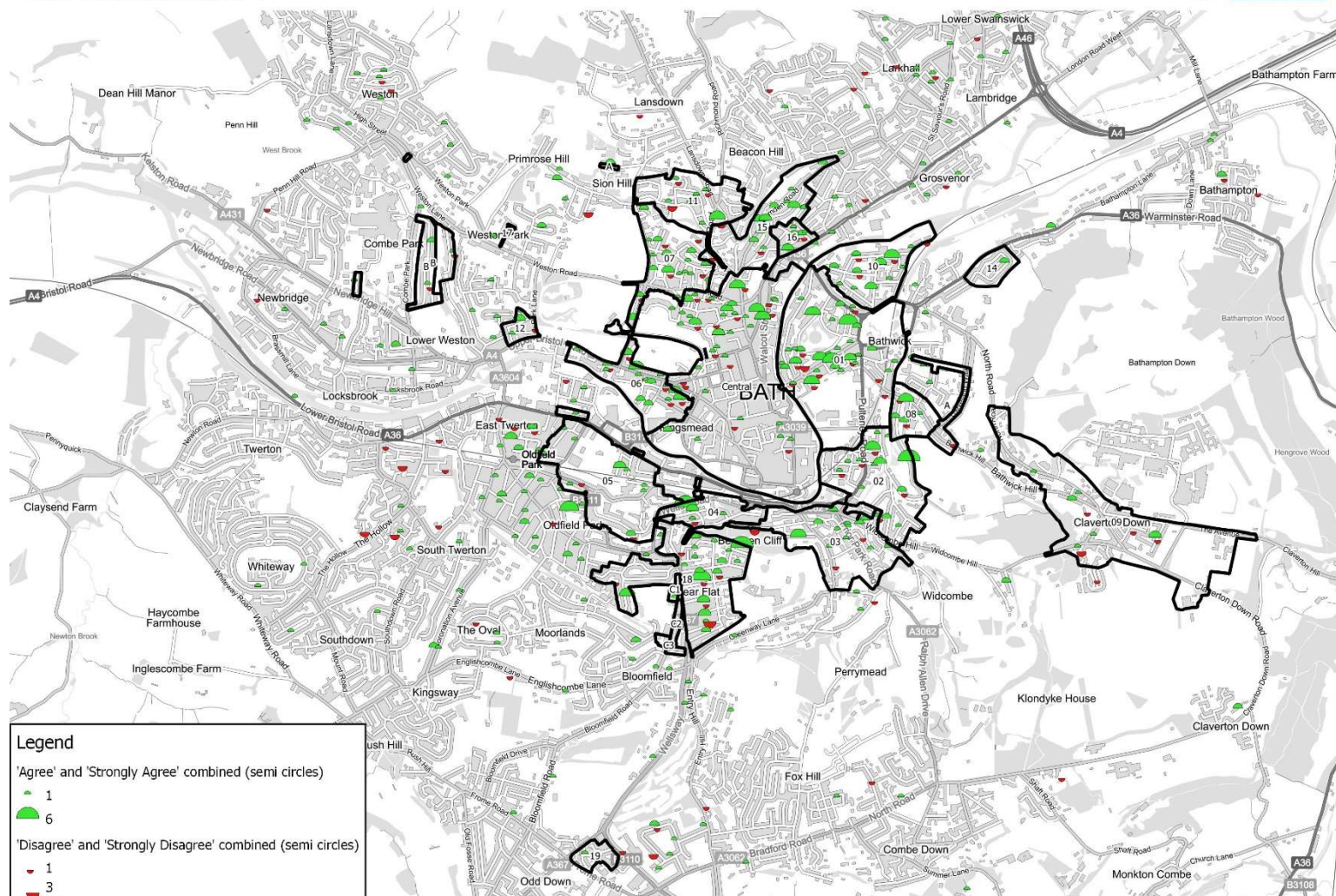


Figure 5-16: Vehicles should pollute less postcode plot –Bath area

6 On-line survey text responses

6.1 Overview

- 6.1.1 Free-text comment boxes were provided to all respondents where they expressed a negative opinion to the proposal selecting either 'Don't really support' or 'Strongly disagree'. Whilst this has the effect of providing a negative weighting to the comments received, it should be noted that some residents disagreed with the proposals as they didn't feel they went far enough and can be considered broadly supportive of the proposals.
- 6.1.2 A text limit of 2,500 characters was in place for each comment to encourage concise feedback, this is approximately equivalent to a page of A4 at size 12 font. An additional free text box, again limited to 2,500 characters, was provided at the end of the questionnaire to allow all respondents to provide any further comments.
- 6.1.3 A combined total of 3,380 free text comments were provided by respondents across all the questions. Figure 6-1 shows how these were distributed against each question.

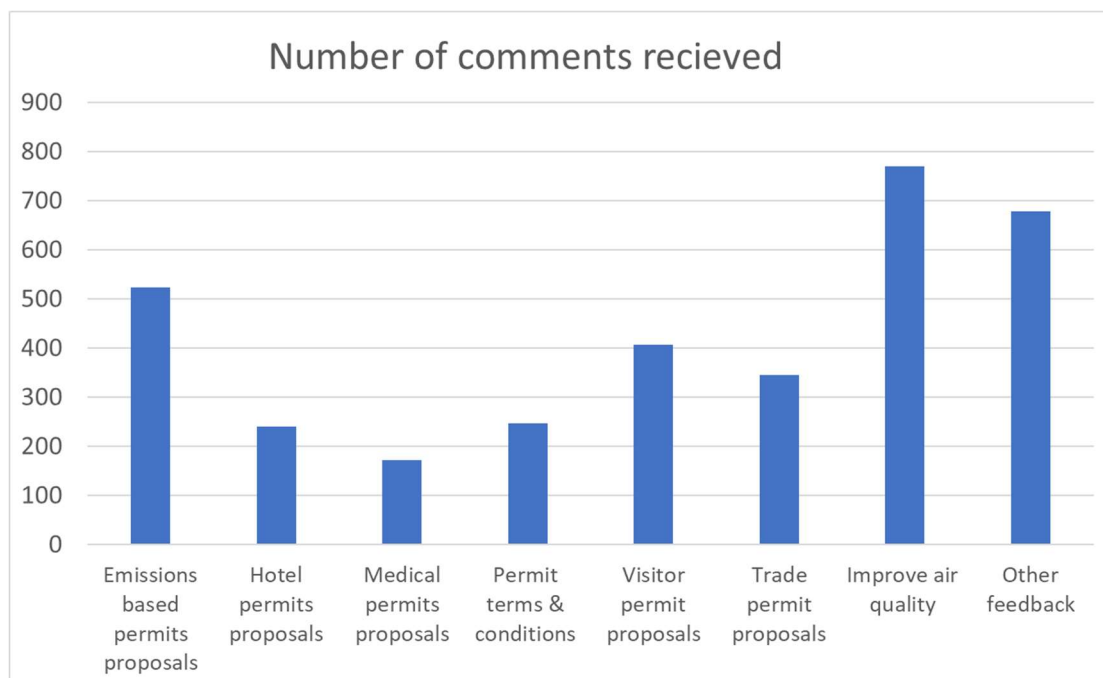


Figure 6-1: Number of individual comments from by respondents per question

6.1.4 The following sections in part 6 outline the issues raised in comments to each question. Due to the volume of responses received comments have been analysed and grouped into themes and a selection of key comments are included to summarise the issues raised which is then followed by a B&NES officer response to these themes, issues and opinions.

6.2 Emissions based parking permits

6.2.1 Theme: *Air Quality*

Key Comments

- *The proposals haven't explained how the change in price will actually reduce air pollution.*
- *Localised air pollution is caused by concentrations of NOx, nothing to do with CO2 emissions.*
- *They take no account of vehicle usage or the very high emission standards of new diesel vehicles*
- *It is a totally unnecessary idea when air pollution and traffic are not an issue in our area.*
- *Many towns across the UK and Europe have taken the necessary steps to reduce/ban non-residential driving and preserve their historical neighbourhoods.*
- *The number of higher polluting vehicles on the road is already decreasing year by year as owners switch to newer vehicles or EVs*
- *It's an absurd idea that the only way to help reduce emissions is to tax people more*
- *There is no evidence to suggest adding a varying permit charge will reduce emissions.*
- *Where is the detailed research over the potential impact of this proposal on emissions in bath? Why would you not wait to see what the actual impact of the CAZ is on emissions and air quality in Bath before investigating this as an option.*
- *An A36 to A46 link and legalisation of electric scooters to cut down school traffic are far more obvious ways to address air quality issues and nugatory pollution*
- *The bulk of pollution comes from congestion which for Bath primarily comes from through traffic, rather than Bath residents. It is this that needs to be solved rather than any charge being applied for which the funds are used for even more admin.*
- *If really worried about cutting down emissions, ban all petrol & diesel vehicles from the centre.*
- *Hopefully this will deter people from buying big gas guzzling cars.*
- *Quantity of cars is really the problem, steps should reduce the numbers overall regardless of emissions.*
- *Cleveland bridge should be closed to all lorries which would improve air quality in the city, reduce congestion and allow the unesco [SIC] city of Bath to flourish.*
- *There is a tax on fuel, which is proportional to emissions, and that could be increased instead.*

- *A huge amount of traffic is generated by parents driving children to school. Tackling this issue would have a far greater impact than penalising local residents who are already very mindful of their environment.*
- *It should be up to the council, university and their appointed bus companies to lead with reduced emissions.*
- *Enforcement should be introduced to fine coach drivers who do not stop their engines whilst dropping or waiting to pick up passengers at terrace walk*

6.2.2 Theme: **Cost**

Key Comments

- *The parking scheme costs were introduced in your own words to 'cover administration not collect revenue, while that may have changed this proposal is a step to far and sounds like cynical money grab.*
- *You are penalising people with low incomes after what has been the most financially difficult year for everyone. The whole idea is ridiculous*
- *Main issue is second vehicles - rather than penalise someone producing 20% more emissions than average - penalise those that have two or more cars and produce 100% + more emissions*
- *If you want to increase the costs then make the costs increase based on the size of a vehicle, as longer ones take up a space and a half compared with a hatchback.*
- *Wouldn't it be fairer to freeze charges for existing residents' vehicles and apply the new charging regime to replacement vehicles as they are introduced?*
- *Change of vehicle costs in MiPermit are currently zero and this needs to be maintained.*
- *As a resident I am paying for a parking space regardless of what vehicle I park*
- *Road tax is already calculated based on emissions. In addition fuel taxation also reflects different emission profiles.*
- *If you can afford an enormous gas-guzzling 4x4 you can afford the proposed increases*
- *The permit costs really needs to be a lot more for high emission vehicles before these people will consider going green!*
- *Considering we were just in a pandemic and most were probably furloughed, and now you want more money or force residents to buy new cars.*

6.2.3 Theme: **Legality**

Key Comments

- *There is precedent that legislation is not applied retrospectively. This will tax residents for buying a car many years ago when the choice they made at the time may have been in line with government policy which focused on CO2 emissions solely.*

- *The idea that parking charges be increased for certain classes of vehicle appears to be an attempt to impose by stealth a more draconian form of Clean Air Zone (CAZ) charging...There is therefore no quantitative or legal reason for introducing increases to parking charges to intervene in vehicle ownership in Bath.*

6.2.4 Theme: **Public Transport & sustainable travel**

Key Comments

- *The continuing refusal to support an East of Bath park and ride works against what you appear to be trying to achieve.*
- *Improve regularity and cut costs for buses.*
- *I understand and agree with the push towards less-polluting vehicles but this is not the fairest way, unless your options for public sustainable transport are vastly improved in tandem*
- *Reward positive behaviour if Park and Ride were free everyone would use it, as long as you charge for it no one will use it.*
- *Electrify your buses*
- *A wider policy and better infrastructure need's to be place first. E. G. Better buses, park and ride bypass etc. Edinburgh does well*
- *Public transport is always late and unhygienic. So therefore I choose to have a car.*
- *Other positive steps, cycle lanes, places to store them etc, not enough cycle storage*
- *There are no proposals to bring motorcycles into the scheme*

6.2.5 Theme: **Electric vehicles**

Key Comments

- *Where are your plans for provision of EV charging ?*
- *I have a diesel and would love to swap to electric - but given the pitiful availability of charging options within the centre of Bath this is not viable.*
- *If the council added EV chargers in residential streets my views would be different.*
- *You need to provide the infrastructure to allow people to be able charge an electric vehicle before you tax us more for not having one!*
- *The proposals are not accompanied by any investment in infrastructure for electric/hybrid vehicles.*
- *We need more research into other technologies such as hydrogen fuel. Residents must not be penalised for this lack of alternative vehicle opportunity.*
- *Yes it will be a good idea in a few years time when street charging points are installed but it is far to early to consider emissions.*

6.2.6 Theme: **Vehicle/behaviour change and choice**

Key Comments

- *People operate a car(s) that meets their needs. They are unable to change at the whim of the council.*
- *People need to choose a vehicle that suits them at their leisure, not because the council wants to try to force people into buying a car that they don't need to avoid excessive parking charges*
- *Most fundamentally the psychology is wrong - we need to reward people for making the right choices in future rather than taxing them for the choices they have already made. The benefits of positive reinforcement over punishment are well documented.*
- *For the 70% of residents who will see their costs increase we need to know that we will be contributing to the future infrastructure of charging points, hydrogen refuelling infrastructure, clean and green public transport.*
- *The emissions policy should be phased in gradually. If people have a serviceable car they bought several years ago, ie a diesel car when they were being encouraged to buy them a few years ago, they should be encouraged to keep these rather than having to sell them to someone outside Bath*
- *I bought a new diesel vehicle in 2010 based on the fact they were promoted by government as the environmentally better option due to reduced CO2 emissions.*
- *Not environmentally sound to introduce any measures that may lead to people changing their vehicle and possibly scrapping older vehicles. This may help air quality but not the environment as a whole*
- *It forces people to scrap or replace otherwise viable vehicles which is costly and impacts in particular families who require larger vehicles.*
- *the amount of energy /emissions involved in making a new car exceeds the emissions of my current car*
- *If you left the current schemes in place over the next 5-10 years there will be a large shift to less polluting/electric cars anyway irrespective of whatever you do*

6.2.7 Theme: **Off street parking**

Key Comments

- *Proposal is penalizing residents who do not have off street parking, no impact on wealthier residents with off-street parking who are likely to have more polluting SUV*
- *Homes with off street parking can easily move to low emission cars by fitting a EV Charger.*
- *Without off road access it is impossible to charge a more environmental electric vehicle. The nearest charging station is over 1 mile away at a local supermarket.*
- *It seems unfair and contrary to your policy that residents who have their own private parking spaces do not have their ownership of polluting vehicles discouraged*

6.2.8 Theme: **Council Intrusion**

Key Comments

- *I do not believe it is the role of the council to take action on these issues. It's intrusive and contrary to individual freedoms on the selection of vehicle.*
- *I object to you telling me what i can do or not do. I pay for my car, It's the car manufacturers of car that should pay not the customer.*
- *BANES should not use charges (especially for non-services like permits) to try to control and manage citizens' lives. Councils were not established to do that.*
- *Parking zones were set up by a vote of residents. By changing the parking costs for some people the council are misusing the original basis of reason for the parking zone which is undemocratic*

6.2.9 Theme: **Incentives**

Key Comments

- *The cost of parking permits and the like are the not the barrier of entry preventing people from buying a lower emission vehicle, it is the up-front cost of buying a newer car*
- *Why not give cheaper parking for electric cars? Give incentives instead of grabbing more money from us.*
- *If you want to alter behaviour make eco car passes Free and create on-street charging options*
- *If you committed to a 3-5 year zero emissions £10 permit without limiting the numbers in any significant way, that would be a better nudge for people to respond to*
- *Creating a hardship scheme will just complicate the service and be abused.*
- *Concentrate on getting people to use their cars less rather than penalising them for owning them.*

6.2.10 Theme: **Administration & Enforcement**

Key Comments

- *You are creating a complex system of charging that will be difficult and more costly to enforce*
- *It does seem complex to administer with different rates to apply when vehicles are changed during the year.*
- *The Council's proposals on the RPZ have obviously been driven by the CAZ so immediate alignment of the boundaries must be introduced to simplify the whole parking arrangements for all residents*
- *Visitor permits should last longer than 12 months*

6.2.11 Theme: **Clean Air Zone**

Key Comments

- *Efforts should focus on removing high polluting commercial traffic from the city*
- *This feels like a back door approach due to the council not getting the answer it wanted on the clean air zone consultation.*
- *A more direct way of deterring high emission vehicles would be to use the clean air zone infrastructure to charge such personal vehicles when entering the city*
- *The same CAZ mechanism could also be used to deter oversized personal vehicles, especially when they have only one occupant.*
- *You are not charging extra for visitors who drive their private cars into the clean air zone, how can you justify residents having to pay?*

6.2.12 Theme: **Students**

Key Comments

- *If you want to reduce pollution, ban student cars and for once act in favour of RESIDENTS.*
- *I think students should be charged as they not a full time resident and they bring sometimes 5 or 6 cars to 1 property they will be staying.*

6.2.13 Theme: **Equalities impact and accessibility**

Key Comments

- *The EDIA has not been completed in a transparent way and has used some really bias views on the assessment...It has not considered the non-residents who can come in to use the limited time bays at not [sic] cost (so are a service user).*
- *The changes are discriminatory towards disabled and elderly people. People will be more isolated and overall there will be no difference to the pollution.*

6.2.14 **Officer Response**

- a. The emissions-based permit proposals aim to improve air quality by encouraging the ownership of less polluting vehicles. Whilst the proposals are a standalone scheme, they are complimentary to other schemes aimed at improving air quality; reducing congestion and vehicle intrusion in residential neighbourhoods; which include:
 - Promoting a major shift to mass transport, walking and cycling, to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy

- Improving the safety of cyclists and pedestrians through active travel schemes
 - Introducing the Clean Air Zone (CAZ) in central Bath, to encourage less polluting ways of travelling around the city to specifically address levels of harmful nitrogen dioxide (NO₂) following government directive
 - Reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods, aligning with our policy and work on Liveable Neighbourhoods.
- b. The council's overarching objective in managing on street parking is to ensure that the highway is able to operate for its primary purpose, the safe movement of vehicles. Parking on the highway, irrespective of the demand for kerb space, can only be provided where it is safe to do so and where the free movement of vehicles can be maintained. The council has a general duty to help protect the health of its residents, business community and visitors' and is committed to improving air quality.
- c. It is important to note that parking permit charges cannot be introduced for the purpose, whether primary or secondary, of raising revenue, even if this revenue was intended to be applied to fund projects meeting the purposes set out in The Road Traffic Regulation Act (1984) (RTRA 1984). The proposals are themselves the measure to address risks to pedestrian safety from air pollution and achieve its duty under s122 of the RTRA 1984.
- d. Any surplus raised from on street charges must be applied for a purpose specified in section 55(4) of the RTRA 1984 and will be allocated to support the development of sustainable transport schemes in accordance with statutory obligations, such as Safer Routes to Schools.
- e. Analysis of current permit data has identified that there is no disproportionate impact from these proposals to those living in more deprived localities compared to those in less deprived localities based on vehicle ownership. The proportion of vehicles impacted by the new proposals is consistent across all areas at 2 in 3 (or 69%), with the average additional charge for a more polluting vehicle being a modest £25.
- f. However, the council acknowledges that whilst there is no disproportionate impact, this does not mean that those in more deprived areas will not be impacted more by the increased charge and is therefore reviewing the duration at which permits can be purchased. This is currently 12 and 6 months; however, shorter durations, including an autorenewal where no changes are required, are being assessed. If implemented, this will provide greater flexibility for the purchase and management of permits, whilst also helping to ensure they are not accidentally left to expire (subject to payment card details remaining valid).

- g. Whilst there is no direct evidence available to show that these proposals will improve air quality; charging mechanisms are a well understood demand management restraint tool linked to price elasticity. As the price of the permit rises for those with more polluting vehicles, its availability will increase as less permits are sold.
- h. We recognise that the timing of any proposed increase in costs is never welcome and that it has been a challenging time for many due to the impacts of covid-19. However, we cannot ignore the need to act to progress measures which aim to improve air quality. As set out in the consultation information and project timeline we don't envisage the implementation of any final decisions made by the cabinet in the summer, until January 2022, after a further stage of statutory consultation in the autumn of 2021. No charges are applied retrospectively as the new charges will only apply at the point of purchase or renewal of a resident parking permit. It should also be noted that the purchase of a permit is optional as residents may choose to park in unrestricted areas outside of their residents parking zone.
- i. The proposed charging structure for emissions based resident permits aligns with the Vehicle Excise Duty (VED), (commonly known as car or road tax) bands based on CO2 emissions, used by the DVLA. Charges will only increase for petrol vehicles that produce more than 130g/km of CO2 or use diesel fuel. You can find out your emission band online at <https://www.gov.uk/get-vehicle-information-from-dvla>.
- j. Based on current permit data, 1 in 3 vehicles will not be subject to any increased charges for their permit. Of those 2 in 3 vehicles that are expected to see a price increase, the average rise for a 12 month 'first' permit is approximately £25.
- k. These proposals are not designed to reduce CO2 itself, but uses CO2 bands as a mechanism to improve air quality by reducing other harmful pollutants from a vehicle's tailpipe. Increased CO2 output from an engine is an indicator of increased combustion of fuel, and therefore other harmful by-products of combustion. It is commonly accepted that the burning of fossil fuels in internal combustion engines result in the production of harmful pollutants at the tailpipe and this is reflected in national policy and the Bath CAZ.
- l. As noted in the National Air Quality Strategy, measures designed to address air quality issues will often have a positive effect on climate change. Whilst there is no attempt to justify the on-street parking permit proposals on climate change grounds, it is anticipated that these proposals will also reduce the level of emissions that drive climate change. For example, as a result, of encouraging a switch to low emission vehicles.
- m. Whilst the general aim of this proposal is aligned to the Bath CAZ, the improvement of air quality, it should be noted that the CAZ is only focussed on reducing NOx to below the legal limit of 40 µg/m3.

- n. These proposals seek to reduce all pollutants through the encouragement of residents to own cleaner less-polluting vehicles. Whilst the level of charge may not in isolation be sufficient to change a person's behaviour on its own, it increases awareness of, and helps make the connection to existing vehicle and travel choices, their impact on air quality and people's health. It is acknowledged that people will make vehicle choices for a variety of reasons to meet their needs and will continue to do so. This proposal does not seek to mandate vehicle change. In doing so, the proposal aims to help influence proactive choices for zero or lower emission vehicles, when people decide to purchase a vehicle. It also aims for greater consideration of other more sustainable or active ways to travel, to reduce car usage and congestion across the road network.
- o. Whilst a link can be made to these aims with duty on fuel, it is a hidden link and not directly associated to emissions. We are unable to influence the levy for fuel duty as this is set nationally.
- p. Air pollution can cause or contribute to a variety of health conditions, particularly amongst the young and elderly. Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution which plays a role in many of the major health challenges of our day. It has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death, to our health services and to business. In the UK, these costs add up to more than £20 billion every year. Source: Royal College of Physicians – *"Every breath we take: the lifelong impact of air pollution"* <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>.
- q. The 'differential' approach for payment of DVLA vehicle excise duty provides for different levels of charge. It has been in place for many years, is well understood and accepted as the basis for payment of vehicle excise duty. The public have the ability to check VED bands online at <https://www.gov.uk/get-vehicle-information-from-dvla>. In contrast, the data on Euro emission standards is less consistent, less accessible and less understood generally. Noting the transition from September 2018 (following the high profile emissions scandals in previous years) from the 'New European Driving Cycle' (NEDC) laboratory tests, based on theoretical behaviour, to 'e-NEDC' tests, which use a Worldwide Harmonised Light Vehicle Test Procedure (WLTP), which is based on real worlds driving data and not comparable to NEDC.

- r. According to DVLA statistics, in 2020 new petrol cars had average CO₂ emissions of 149g/km, whilst new diesel cars had emissions of 165g/km, decreases of 4.1% and 0.4% on 2019 respectively. Average new car fuel efficiency has generally increased over the past two decades, however, this trend reversed in 2016 as new cars became less fuel efficient driven largely by an increase in the proportion of SUVs and other large vehicles (source: DfT Transport Statistics 2019). Furthermore, Euro standard data on a per vehicle level is not available to councils to allow automatic validation of compliance.
- s. Whilst the new euro standards have ensured that diesel vehicles emit lower levels of NO_x comparatively, they still emit higher levels of NO_x and more particulate matter than petrol vehicles. The current Euro 6 emission standard for diesel vehicles registered from 2015 has a higher acceptable level of NO_x at 0.08g/km compared to its petrol equivalent at 0.06g/km.
- t. We acknowledge that some years ago, government policy was to encourage diesel vehicles as a more carbon-efficient fuel than petrol vehicles. We cannot ignore, that more recent evidence shows that diesel vehicles have harmful effects to health with higher emissions of NO_x and particulate matter, which are now well publicised.
- u. We acknowledge that a parked vehicle doesn't generate emissions, and that in some cases vehicles may not be regularly used, or only used for short local journeys. However, the potential for daily usage of vehicles is present and the proposal allows for a simplified and consistent approach. Analysis undertaken for the Clean Air Zone identified, that 1 out of every 3 car journey in Bath are made within the city, which equates to over 50,000 car movements on a typical weekday.
- v. Resident permits are restricted to 2 per eligible property in all zones except for Bath central and Peasedown St John (which are restricted to 1 permit). Higher charges continue to apply to 2nd permits as a disincentive to purchase.
- w. The new scheme will still allow residents to manage and swap vehicles on their permit where they have pre-registered at the time of purchase. Four can be registered when the permit is purchased, with the charge based on the most polluting.
- x. The administration charge is required to allow residents to add/change a vehicle at a future date, (the maximum of four still applies) providing its emissions band is equal to or less than the most polluting vehicle already on the permit. A member of staff must undertake a check to verify this and the change will then need to be applied on the resident's behalf.
- y. The application process for a resident's permit will remain self-serve through MiPermit with new charges calculated automatically based on the most polluting vehicle of those pre-registered.

- z. To make the emissions-based prices fair, we are proposing to apply the new charges consistently across all residents parking zones in in Bath and North East Somerset, not just those in Bath.
- aa. The council is currently assessing proposals to implement powers to tackle idling vehicles which will allow it to issue fines to drivers that refuse to switch off their engines when parked.
- bb. Clevedon Bridge carries the A36 which is a major strategic highway to the South with daily traffic of up to 17,000 vehicles. Without this crossing, all traffic would either route through the historic centre which are roads protected by access and weight restrictions, or divert using roads to the east which would incur significant additional journey time. <https://beta.bathnes.gov.uk/cleveland-bridge-renovation-project/cleveland-bridge-renovation-project-0>
- cc. We acknowledge school runs can contribute to unnecessary local car journeys. The draft on-street parking terms and conditions propose that other historical permits not specifically detailed in the terms and conditions (for example school parking permits) will be reviewed on a case-by-case basis, as and when we receive requests for renewal. Permits which are not in line with council policies may not be renewed and may be removed from circulation. As a council we engage with school communities to promote active and sustainable travel journeys. See an example at <https://www.bathnes.gov.uk/services/streets-and-highway-maintenance/road-safety/school-crossing-patrols/safer-routes-school>
- dd. You can view our wider strategy for Liveable Neighbourhoods at <https://beta.bathnes.gov.uk/liveable-neighbourhoods-consultation>
- ee. Bus operator First West of England has invested £30million as part of a programme to introduce new-build vehicles and retrofit new technology into slightly older models to become much cleaner. It has also committed to operating a zero-emission bus fleet by 2035.
- ff. The council is taking a lead to reduce emissions along with WECA including oversight of public transport. Replacement council fleet vehicles must now be zero emission, except where no EV variant is available.
- gg. The council has previously examined the potential for provision of a P&R site to the east of Bath and concluded that there are no deliverable sites meaning that alternative solutions to tackling these issues are now being explored.
- hh. Bus based public transport is mainly a deregulated service under the Transport Act 1985. Due to the pandemic, most if not all services are currently funded by Central Government, who have spent over £1b to support bus networks during the period since March 2020.
- ii. Bath benefits from a Railway station, centrally located as part of the main line to and from the South West. Other local stations for example Keynsham and Oldfield Park provide further local convenience.

- jj. Central Government released their “Bus Back Better” Strategy <https://www.gov.uk/government/publications/bus-back-better> . This national strategy sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered.
- kk. Work is underway at WECA to deliver the requirements of the strategy to ensure the West of England has the best possible public transport network that is both efficient and affordable. Accessibility remains a key consideration including the commitment to the requirements of the Public Service Vehicles Accessibility Regulations 2000 to ensure that all our buses are accessible.
- ll. As part of the strategy we are required, as part of WECA, to produce a Bus Service Improvement Plan and submit it to Govt by 31 October 2021 as a bid for a share of £3bn Transformation Funding to provide ongoing support to the bus network during recovery and to improve the service offer.
- mm. BNES continues to support what are classed as socially necessary bus services to the tune of approximately £1.4m per annum through a mixture of funding sources including revenue funding and section 106 money, paid via levy to the West of England Combined Authority who are the Local Transport Authority since the powers transferred in 2018. The council continues to attempt to identify additional funding mechanisms to support services further, but this can be challenging in light of other budget pressures.
- nn. Parking at the Park and Ride is free of charge. A range of fares are available for the bus travel into Bath which includes a group return ticket (2 adults with children under 16 free of charge) covering the whole day for less than the cost of two individual tickets, or equivalent four- hour parking stay in the council’s off- street car parks. Groups of up to five may also travel on the service, with unlimited travel on other services in the Bath zone, for £9, a 50% saving than the cost 5 individual tickets.
- oo. The council has ambitions, subject to relevant approvals, to operate later park and ride services and overnight parking at its park and ride sites to facilitate long stay visitor parking outside the city centre.
- pp. These proposals do not include motorcycles as both the council’s Placemaking Plan and Parking Strategy support and encourage the use of this more sustainable form of transport. As such, motorcycles do not require parking permits within Residents parking zones
- qq. Public electric charging points are available in the locality with more planned across the West of England. For example, the ‘Revive’ project is delivering four rapid charging hubs and 120 new charge point connections through the Go Ultra Low West project with new chargers being installed in Charlotte Street car park, Kingsmead Square car park, and other locations. <https://travelwest.info/electric-vehicles/revive-charging-network>

- rr. It is true that electric vehicles still have associated emissions from manufacturing the battery and from electric generation. A study by the universities of Exeter, Nijmegen and Cambridge concluded that electric cars lead to lower carbon emissions overall. Researchers carried out life-cycle assessment which included the production chain and waste processing.
<https://ore.exeter.ac.uk/repository/handle/10871/41003>
- ss. We accept that over time more people will change to electric vehicles given Government directive for all new electric vehicles from 2030. The emission-based permit proposals aim to contribute to the improvement of air pollution now.
- tt. Further appropriate infrastructure is needed to support electric vehicle charging. As part of proposals for Liveable neighbourhoods, the council recently undertook public consultation on On-street electric charging strategy. This can be viewed in full at <https://beta.bathnes.gov.uk/sites/default/files/2020-09/DRAFT%20ON%20STREET%20EV%20strategy.pdf> report
- uu. It's acknowledged that those with off street parking may not be directly affected by this specific policy in respect of charging; however, it should be acknowledged that the cost of a property with off street parking will be greater than an equivalent property in the same locality without off street parking. This is typically greater than the cost of on street permit to park on the highway. However, as land and property costs vary considerably it's not possible to make a comparison between the costs of private land use vs the costs for using public highway to park a vehicle. Typical costs for converting private land into a single car driveway are estimated at £3,500 on average (source: www.priceyourjob.co.uk), with this adding typically 5% to a property's value, rising to as much as £50k in densely populated urban areas. Creating an off-street parking space may also require planning consent or approvals from the Highway Authority for a dropped kerb. A survey of private parking spaces available for rent via parkonmydrive.com shows equivalent annual costs of renting private off-street parking in central Bath of between £700 and £5,000.
- vv. The council does not have resources to provide grants to support residents changing to less-polluting vehicles. Whilst grants are available in respect of compliance for the Clean Air Zone, this is provided via government funding, and is subject to eligibility.
- ww. There are financial incentives available from central government towards the cost of new electric vehicles and charge points, both for individuals and businesses - <https://www.gov.uk/plug-in-car-van-grants/what-youll-get>
- xx. The proposed emissions-based charging structure includes reduced rates for zero emission vehicles, equivalent to a 50% discount of the base price of £100 for a 1st non diesel resident parking permit.

- yy. Free parking permits are not proposed for electric vehicles. Whilst significantly better for the environment, they are not resistant to producing airborne pollutants. This includes for example particles released from brake and tyre wear and road dust disturbed by a vehicle's motion regardless of the vehicle type or its mode of power. Whilst emissions from EV vehicles on the road are significantly less than other vehicles, they still contribute to congestion and the use of kerb space. However, limited numbers of permits are currently available across all council parking permits with discounts of up to 90% in place for motorists with a zero-emission vehicle. The council will review options for extending this offer.
- zz. Students are subject to the same eligibility criteria and terms and conditions as any other applicant to determine residency for the purposes of resident parking permits. The same maximum permit entitlements apply for an eligible property including Houses in Multiple Occupation, dependent on the zone in which they reside i.e. maximum of 2 (1 in Bath central zone and Peasedown St John. If permit misuse is suspected, this can be reported to Parking Services for investigation.
- aaa. We completed Preliminary Equalities Impact Assessments to assess and identify impacts to those groups with protected characteristics and those vulnerable individuals on low income and in deprived areas. This proactive first stage consultation allows us to consider additional needs and feedback that we may not have considered, and we will publish an updated and revised Equalities Impact Assessment alongside the report on the outcome of this consultation. Time limited parking bays do not require a parking permit so are not within the scope of this consultation.

6.3 Hotel permits review

6.3.1 Theme: **Residents**

Key Comments

- *There are too many issued*
- *There is insufficient parking for residents whose needs are the priority over hotel visitors.*
- *Hotels take a lot of residents parking for their customers, which result that the people living in the area CANNOT PARK ANYWHERE, OR THEY HAVE TO TAKE THEIR CAR IN OTHER AREAS!!*
- *If residents can no longer drive into the centre of Bath and park why should tourists be given more benefits.*
- *You are telling us to move to public transport and then give out tourist parking permits. Too many. Tax the tourists*

- *There are now too many operations that are classified as hotel (Air BnBs, etc), and it generates far too many parkers in and around residences that pay year round to park in their zone.*
- *If/when I go to London, or other major cities, I have to pay for garage or similar parking, why not same here?*

6.3.2 Theme: **Business Impact & cost**

Key Comments

- *You are penalising visitors and businesses*
- *You will discourage tourists from using B&B's & Holiday Lets*
- *Small business survive by having this as part of their USPs*
- *Hotel and holiday let guests often have luggage and need/ want to be able to park close by. If this is not possible it may mean guests will not choose these hotels and many city centre hotels and guest houses/holiday lets may close*
- *We need to support local businesses not hinder them with extra charges for parking as well as all the other charges they have to pay, we should be encouraging people to visit Bath*
- *Hotel guests need to be able to park as near to the hotel as possible and removing on street parking will simply make Bath less attractive as a destination.*
- *More stress on the tourism industry. Struggling businesses need a break. This will make it more expensive for customers.*
- *It is not offering any value or convenience for accommodation providers or their guests.*
- *The extra administration is no 'advantage' for hoteliers it will be more complex and more time wasting. A one off annual payment for each permit is by far better for the hotelier*
- *It is totally unreasonable to expect guests of hotels. guest houses and holiday lettings situated away from the city centre to use long-term council car parks, all of which are in the city centre.*
- *There is no fair parking provision for staff.*
- *These businesses are a fundamental part of the life of the city, providing employment for residents and facilities enjoyed by residents, as well as visitors.*
- *This isn't the initial welcome we want to give our guests, and unfair to expect our accommodation providers to deliver this shameful organisational chaos to our guests the minute they arrive.*
- *In addition, the cost is most likely to be absorbed by the accommodation provider and is unlikely to be passed on to the guest, as it's embarrassing enough to ask them to go through the ordeal of parking let alone having to charge them £15 a day for the privilege! it is just another blow to the already price-sensitive tourism industry.*
- *Shuttle services could also be encouraged by hotels using electric vehicles*

- *It needs 2 years notice of implementation so we can alter marketing as we allow guests to book upto 2 years in advance whilst enjoying free parking.*
- *Hotels should be required to provide off-street parking for their guests. Otherwise they are being subsidised by residents and council tax payers*

6.3.3 Theme: **Tourism**

Key Comments

- *It will undermine Bath's tourist industry - very inconvenient for tourists who want to come to Bath - they simply won't come*
- *We want to encourage tourism and visitors to Bath*
- *You are going to limit the amount of visitors coming to Bath especially those that cannot use public transport.*
- *Will impact hospitality sector*
- *Bath is increasing becoming a 'destination city' so visitors should be encouraged to use public transport & the city car parks.*
- *The tourism policy seeks to increase the quantity of high value tourism and visitor length of stay, however this policy works against that policy and will only make the high calibre visitor travel elsewhere.*
- *This will leave the city open to lower quality day visitors on coaches and group party tourism such as Hen and Stag parties again arriving in coaches, that do not bring the value that we would like to see being enjoyed in the city*
- *A 'meaningful' tourism tax on stays is common in popular destinations outside the UK - having a similar tax for Bath would make sense for accommodation stay*
- *This policy will simply damage the local economy and will not achieve the improvements in congestion and pollution that the policy sets out to achieve, in fact it will have the reverse effect as cars will be stuck in the city with nowhere to park.*

6.3.4 Theme: **Parking**

Key Comments

- *The only people who should have a right to park in the city are RESIDENTS*
- *These are not helpful in terms of solving the parking problems for local people or day visitors.*
- *Visitors to hotels should find their own parking.*
- *Hotels should use their land to park cars.*
- *Provide viable alternatives, the hospitality industry has it bad enough as it is the moment.*
- *There is no need for parking to be close to the hotel - this is the case in most European destinations, where visitors are encouraged to leave their vehicle in a car park and use public transport/walk.*

- *You're happy for people staying in hotels to park in Bath but not residents. Tell them they have to use public transport instead*
- *What about lone women travellers arriving after dark and not being able to park close to their hotel.*
- *There are logistical issues with the proposed method of permit usage and validation and so we are not convinced about the practical implementation without further trials*
- *What is the point of a pre-paid licence to park in a car park with no guaranteed space? The driver should just pay on arrival having found a space.*
- *They are just as likely either way to drive round Bath trying to find somewhere to park. More pollution and congestion*
- *There will be many more cars looking to park in the car parks and, as is well known, Charlotte St car park becomes full at peak times already - perhaps the others do too. Where do guests park then?*
- *The alternative is that the guests park dangerously on double yellows / corners to drop off the majority of the group and luggage (a nuisance to residents, other road users and - as has been proven on Rivers Street - damages the pavements)*
- *Why not allocate park and ride spaces for some of the city centre hotels instead?*
- *From direct observation the street fills up from a Thursday to Monday each week with cars that do not move all of whom are residents of the four main hotels at this end of Great Pulteney Street.*
- *Hotels should sort out their parking with their own car parks or using the public car parks or Park and Ride.*
- *They should get no permits at all, they should just have to take the risk and pay the 24hour cost*
- *Too many permits. Too few parking spaces. The Council could remove a lot of single yellow to increase space. It chooses not to.*
- *Locals in the central zone have chosen to stay at the very heart of the city. They have many options to live a car free life (trains, buses, car share clubs) and so if they have a car, they bought it knowing how difficult it is to park.*
- *Our visitors should be a higher priority for Bath than locals who knew & chose to live, in the parking situation that they find themselves.*

6.3.5 Theme: **Public Transport**

Key Comments

- *Set up a proper park and ride service like Oxford*
- *Hotels should promote the use of the park and ride parking available around the city limits*
- *The use of public transport eg train, bus, taxi should be encouraged.*
- *Those that drive into Bath do so because there is no public transport alternative*
- *Visitors to the city should travel on public transport if the hotel cannot provide off road parking for them.*

- *Hotels should contribute to the park and ride and vehicles should not be allowed to drive into Bath at all.*
- *There are perfectly good services available to support this without permits being provided. This in itself would help reduce traffic in the town.*
- *There is no secure 24 hr park and rides in bath for people to park in.*
- *There is not a park and ride to the east of the city for people to park in. Please do not change the current system for hotel visitor parking without providing a viable alternative.*
- *Hotel visitors should arrive by train, bus or taxi*
- *Make some Park and Ride provision that enabled visitors to park free outside Bath and get into Bath on PT to their Hotel, B&B or Let with a voucher that formed part of their booking to provide a Free Bus Ride - part of the provision to and from their Vehicle.*
- *Most visitors arrive in a car NOT the train/bus. If they are doing a tour around the South West or moving on to another town they need a car - it cannot be done on public transport currently.*

6.3.6 Theme: **Air Pollution and congestion**

Key Comments

- *Proposals haven't explained how the change in price will actually reduce air pollution*
- *The proposals to force visitors to park in long-stay car parks will increase unnecessary car journeys in, through and around the city, increasing emissions and congestion rather than promoting hyperlocal car parking options*
- *Get the train, the city already too congested*
- *Holiday Let guests are an insignificant contributor to pollution. They generally drive in, park and at the end of the stay leave*

6.3.7 Theme: **Misuse**

Key Comments

- *Hotels have been known to sell their guests parking thereby making money on parking.*
- *The revenue for these permits currently goes to the hotel/guest house (not the Council or the community) and has become a profit centre for some of them.*
- *The proposals suggest breaches of terms and conditions as a motive for such significant price increases; whereas monitoring and enforcement is a solution to this.*

6.3.8 Theme: **Accessibility**

Key Comments

- *The proposals are detrimental to visitors with reduced mobility and accessibility needs and prevents guests parking near their accommodation. This is likely to increase anxiety regarding safety and security*

6.3.9 Officer Response

- a. The proposals consulted on seek to relocate long stay visitor parking from on street residential parking areas into council long stay car parks.
- b. Owners and managers of hospitality accommodation whose property is registered for business rates will be able to utilise the new electronic system and activate off street parking on behalf of their guests in periods of multiples of 24 hours running from midday to midday. The permit account holder will be charged by the council at the equivalent daily car park rate, currently £15 per day as at June 2021.
- c. These proposals aim to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods.
- d. The council's overarching objective in managing on street parking is to ensure that the highway is able to operate for its primary purpose, the safe movement of vehicles. Parking on the highway, irrespective of the demand for kerb space, can only be provided where it is safe to do so and where the free movement of vehicles can be maintained.
- e. The Parking Strategy adopted in 2018, set out a number of objectives and actions. This includes a reduction in on street long stay parking in the city centre in order to allocate a greater proportion of spaces for disabled users, residents and short stay visitors. This was further supported by the introduction of the hierarchy of kerb space to allocate limited kerb space using a balanced approach to meet these aims.
- f. The removal of cheap convenient parking in residential areas is proposed to discourage visitors from bringing their cars into the city centre.
- g. Limiting the availability of on street parking for long stay guests, where vehicles typically remain parked for long periods during the visitors stay, ensures a higher turnover of the limited parking availability in the central areas.
- h. The current hotel parking permit terms and conditions require permit holders to charge no more than the pro rata daily amount to their guests for the use of the permit. This is typically between £0.20 and £0.50 per day depending on the number held. However, we are aware of significant abuse of this permit with permit holders charging rates of between £10-12 per day.

- i. The low cost of pro rata charges for Hotel permits, between £0.20 and £0.50 per day depending on the number held, is significantly below the charges for city centre long stay parking and disincentivises visitors from using more sustainable forms of transport to visit Bath.
- j. The council acknowledges that the hospitality sector, like so many sectors in the UK, has been affected by the COVID pandemic since March 2020. Government schemes have been available to support business impacted by the pandemic restrictions at a national level. It's not reasonable or fair for the council to provide subsidised parking and an economic advantage to businesses with more desirable tourist locations close to popular tourist attractions in the centre of Bath, whether this makes it more convenient for, or the business more desirable to guests.
- k. The system is not intended to guarantee parking for visitors and instead serves to ensure that should those premises that do not have their own parking want to include it for their guests as part of an inclusive package, they can do so.
- l. The council is aware from Penalty Charge Notice appeals and from business websites that many permit holders levy charges to guests significantly above the pro rata daily charge (typically between £10-12 per night) thereby profiting from the permit at the expense of council income to support sustainable transport schemes, including local bus services and safer routes to schools.
- m. The proposed charges would see businesses charged at the same rate for 24hours parking as a visitor using the council off street car parks. If a business chooses to absorb these costs as part of a managed package to guests, or include them within their standard fees, or pass them on to guests for those that want parking, they are free to do so, at a cost they feel appropriate to charge.
- n. This proposal is based on an online system which ensures minimal administrative burden onto permit account holders and is used across the UK in a variety of parking operations.
- o. Establishments can manage their guest parking directly with a public MiPermit account, as they may currently do, to allow them to benefit from the greater flexibility with tariffs and arrival/departure times. However, use of the public facing system in this way requires greater management and administration to ensure guests remain legitimately parked. This burden is likely to increase exponentially the more consecutive and concurrent stays they manage.
- p. The new system will ensure businesses have an accurate digital record of when guests' vehicles parked with a valid permit and ensure that there is no paper permit to manage or renew
- q. The council acknowledges that not all residents parking zones and affected businesses are located in central areas close to where off street car parks are located and the proposal will be reviewed in light of this.

- r. The council has ambitions, subject to relevant approvals, to operate later park and ride services and overnight parking at its park and ride sites to facilitate long stay visitor parking outside the city centre.
- s. The council acknowledges the benefits to blue badge holders being able to park close to their destination and is assessing options to address this within the proposals. Blue badge holders are also permitted to park on yellow lines in accordance with the provisions of the Blue Badge Rights and Responsibilities scheme. <https://www.gov.uk/government/publications/the-blue-badge-scheme-rights-and-responsibilities-in-england>. Blue Badge holders may park for unlimited time in on street pay and display bays located across the city centre.
- t. Visitors to Bath coming by car may purchase their parking through this new system as part of a package, managed by their hotel, or they may purchase parking themselves directly via MiPermit (www.wanttopark.com/bathnes) to benefit from the full flexibility of the tariffs available. If they purchase themselves they can do so in advance at their own risk, or they may purchase upon arrival after having located a parking space. When purchased directly the customer is only charged on the day and can cancel unused future dates.
- u. Provision of staff parking is the responsibility of the employer and the council does not provide on street permits for commuter parking. Season tickets are available for the council's off street car parks via MiPermit at www.wanttopark.com/bathnes.
- v. The city centre is covered by an extensive CCTV network that is monitored 24 hours a day. The council will review its membership of the Park Mark © Safer Parking Scheme, a Police Crime Prevention Initiative (Police-CPI) and is aimed at reducing both crime and the fear of crime in parking facilities. This standard is awarded to parking facilities that have met the requirements of a risk assessment conducted by the police and was previously held by all council operated car parks until it withdrew from the scheme.
- w. National exemptions apply which allow loading and unloading to take place on single and double yellow lines. In addition, this exemption applies within permit holder bays. Guests arriving at an establishment after the operational hours of a residents parking zone may also park for free on single yellow lines overnight until they are operational in the morning. Operational times of the single yellow line is displayed on signage throughout the zone and at the point of entry into the zone. The council's Civil Enforcement Officers undertake regular patrols of all city centre areas where parking controls exist to ensure restrictions are not abused.

- x. Where members of the public believe regular contraventions are taking place, these can be reported to Parking Services on 01225 477133 or Parking@Bathnes.gov.uk so that officers can investigate and take appropriate action. The council is unable to provide a reactive service, however, where regular issues are identified proactive monitoring will be put into place subject to resources being available.

6.4 Medical permit review

6.4.1 Theme: *Impact on visit/Service*

Key Comments

- *Will reduce time for visits putting vulnerable at risk.*
- *Need more than 2 hours*
- *Too complicated to implement*
- *Will take time away from patients*

6.4.2 Theme: *Cost*

Key Comments

- *Permits should be free*
- *Yet another financial burden – need to reduce cost*
- *These professionals must park close to homes so it's a stealth tax*
- *Should be cost recovery only*
- *Costs will be passed on to the sick and elderly*

6.4.3 Theme: *Provision of permit*

Key Comments

- *Not needed*
- *Too many permits already*
- *Other workers are essential not just medical*
- *Will be abused e.g. for commuting*
- *Medical professionals shouldn't get cheaper parking than everyone else*
- *Without permit to display can't tell if someone is parked legally*

6.4.4 Theme: *Confidentiality*

Key Comments

- *Collection of info could breach confidentiality*

6.4.5 Officer Response

- The introduction of a time limit for each activation supports the results of previous monitoring exercises on the use of paper permits. This showed that paper permits were often used for much longer stays as a form of cheap commuter parking. There are no restrictions on a permit holder activating concurrent stays in the same location, even where they do not move their vehicle. The information provided will allow proactive monitoring to determine if frequent concurrent stays are legitimate or indicate a pattern of use for commuter parking.
- Activating a stay uses the same simple process (mobile app, online via a browser on mobile or PC; via text; or call centre) used for the activation of cashless pay and display parking in council car parks and on street used by the customers to create 55% of all parking stays across Bath & North East Somerset
- Current Medical permits are provided to care and medical professionals to enable them to visit patients in their own homes, easing pressure on local services. They currently cost £60, or 25p per day based on working days only (236 days a year).
- These permits are typically purchased by businesses and not by an individual personally. The proposed charge brings them in line with the council's baseline charge for an on street residents permit, and increased the daily cost to 42p per day, significantly below the cost for on street parking in Bath at £2.50 to £3.80 per hour (June 2021 charges).
- Medical and care professionals will continue to be able to park close to patient's homes where parking spaces are available
- The new digital permit, like the existing digital residents permits, will be viewable to the council's Civil Enforcement Officers when they are on patrol allowing enforcement action to be taken if appropriate. The new permit will allow proactive monitoring to determine if frequent concurrent stays are legitimate or indicate a pattern of use for commuter parking to allow misuse to be proactively managed in a more efficient way than paper permits allow.

- g. Information on parking stays activated will be used in line with the Data Protection Act 2018. The council is under a duty to protect the public funds it administers, and to this end may use the information provided when applying for or administering a permit for the prevention and detection of fraud. It may also share this information with other bodies responsible for auditing or administering public funds for these purposes. We may also use personal data to enforce the parking terms and conditions and where Bath & North East Somerset believes a contravention has occurred. We are processing personal information in order to fulfil our legal obligations under the Traffic Management Act (2004). Personal data may be collected and retained in order to carry out the performance of a legal obligation and information may be shared with third parties for reasons permitted by law. If you would like more information about how we use your data, please see <http://www.bathnes.gov.uk/council-privacy-notice>

6.5 New Terms and Conditions

- 6.5.1 Where themes and issues identified from responses about the new terms and conditions related specifically to other proposals included in this consultation, they have been included within appropriate section to avoid duplication within this report. This includes the following themes identified within this proposal:

- *Air Quality*
- *Costs*
- *Administration & Enforcement*
- *Off street parking*

6.5.2 Theme: ***On Street parking***

Key Comments

- *Visitor permits should be taken away as there are not enough spaces*
- *Should be allowed to park wherever we want to.*
- *Residents should be given single parking space because they are a resident.*
- *Permits should be valid in the original area and all adjoining zones.*
- *One permit per household would decrease parking 'pressure' and encourage car reduction.*
- *2nd resident permit should be on a 1st come 1st served basis & at a higher premium, with the combined total limited to the on street parking space available in the zone applied for.*
- *Local businesses should have access to permits in outer zones where there are no local car parks.*
- *The central zone should be increased to 2 permits now that Airbnbs, hotels and similar transient users have no entitlements.*

- *No residents permits where households have access private parking spaces .*
- *Business permits should be ended to encourage public transport usage or provision of own on-site parking. They disadvantage residents, ignore issue of student and tourists and prioritise the holiday let business.*
- *Permits should solely be for residents i.e. the council tax payers, not HMO's and/or student accommodation.*
- *Staff cannot use public transport should be allowed permits.*
- *Lending a permit is reasonable in the event of eg. house-sitting or similar.*
- *Make the Central car parks for residents and trades only. Make all day visitors use the perimeter car parks*
- *New developments and new builds having no permits may negatively impact the creation of new homes in Bath.*

6.5.3 Theme: **Sunday charges**

Key Comments

- *Public transport on a Sunday is terrible, despite changes to park and rides.*
- *No justification for Saturday and Sunday - charge for mid-week to catch commuters*
- *There is an issue on Sundays for those who come into and around the city centre to worship in churches and other places.*
- *RPZs should be extended to include Sundays, when the maximum demand for retail visitors and residents parking coincide.*

6.5.4 **Officer Response**

- a. The council's overarching objective in managing on street parking is to ensure that the highway is able to operate for its primary purpose, the safe movement of vehicles. Parking on the highway, irrespective of the demand for kerb space, can only be provided where it is safe to do so and where the free movement of vehicles can be maintained. The use of residents parking schemes is a useful control to provide priority to limited kerb space to residents over commuters and visitors to an area where demand for parking is high.
- b. The Residents Parking Schemes strategy sets out the strategic vision for resident parking schemes in the city of Bath and sets out the revised policy for the implementation of residents' parking schemes within wider B&NES. This policy applies to the consideration of new schemes and the review of existing schemes where necessary. This will include proposals for design of schemes for example, the layout; times of operation, and the process for community engagement; public consultation; and traffic regulation order approval. The policy can be viewed at <https://beta.bathnes.gov.uk/sites/default/files/2020-09/DRAFT%20RESIDENTS%20PARKING%20SCHEMES.pdf>

- c. Existing policy for new residents parking schemes ensures that the entitlement to permits for a residential property is offset by its availability to off street parking. An off street parking space is an area whose internal dimensions are 2.5m by 5m and multiples thereof.
- d. The Parking Strategy adopted in 2018, set out an action, subject to resource being available, to “*consider undertaking a strategic review of the existing residents parking scheme zoning system to determine whether an alternative zoning structure would result in more efficient use of on-street spaces.*”. This review may provide the opportunity to assess the implementation of this offset to all residents parking zones, however it should be noted that it is expected this change could only be applied where the ownership or tenancy of a property changes.
- e. Parking permits provide the permit holder with the authorisation to park in a permit bay as a member of a scheme. They are not a payment for parking and a parking space is not guaranteed. This is due to the need to manage a range of competing demands on the public highway in a popular modern city to enable it to function, including residents parking; property maintenance; access to businesses for goods and services; pay and display parking (where dual use bays operate).
- f. The council is unable to limit the sale of permits to a first come first served basis, linked to the availability of permit spaces, due to the competing demand for these spaces by other valid users. The management of bays on a first come first served basis would require the management of waiting lists for those users unable to obtain a permit and the council does not have the resources available to manage this process.
- g. The council provides a limited number of visitors permits (varying by zone) to residents to allow visitors to park close to their homes. This helps to ensure, particularly amongst residents that are vulnerable or living alone, that they are able to receive guests.
- h. The controls on restricting permit entitlement to new builds or properties which have undergone redevelopment is only applied in residents parking zones where potential demand for kerb space exceeds the amount of parking available. Potential demand is based on all eligible properties purchasing a first permit, with uptake of second permits based on the average across all zones, currently 40%.
- i. The council’s city centre long stay car parks provide capacity to enable the council to meet its obligations to manage traffic on the highway and to support the local economy by providing long stay parking to visitors and commuters working in the city centre. Central zone and zone 6 permit holders are entitled to use their residents permit to park free of charge in Charlotte Street car park from 17.30 until 10.00 the next day. This ensures other users that require access to the city centre for parking during the day can access spaces.

- j. Provision of staff parking is the responsibility of the employer and the council does not provide on street permits for commuter parking. Season tickets are available for the council's off street car parks via MiPermit at www.wanttopark.com/bathnes.
- k. The extension of operational hours for paid for parking and residents parking is not included as part of this consultation. This proposal will be subject to further consultation later in 2021 in accordance with legislative requirements for Traffic Regulation Orders. These are the legal orders that set out the restrictions that apply for each resident parking zone.

6.6 Review of Trade permit charges

6.6.1 Theme: **Cost**

Key Comments

- *Increase in price just makes any work done for us residents more expensive, as there is no alternative.*
- *Increased costs damage local economy and prosperity*
- *Trade Permit should increase in line with inflation*
- *Will put up the price of everything to customers, again hitting societies poorest*
- *A trade permit should be reasonably priced £5 or £10 a day MAX!*
- *Trades make the City work. They should not be charged*
- *Support a free and limited parking allowance for tradespeople carrying out essential work within the CAZ*
- *Why parking in inner zones should cost 4 times as much as outer zones*
- *An increase in prices will have no impact on whether a plumber/builder/electrician uses his/her van.*
- *Maintaining what is deemed to be of national importance is already expensive as residents we are being asked to bear yet more costs for the privilege of living in the city.*
- *This measure has absolutely nothing to do with air pollution or parking, it is simply financial exploitation.*
- *Councils proposals never take account of peoples ability to pay.*
- *People have been unable to trade for long periods through Covid*
- *Unfair on small businesses to pay higher parking rates.*
- *Big companies will just absorb the price.*
- *Smaller, independent retailers will suffer*
- *may discourage some traders from working in Bath.*
- *Given the number of empty retail units in town, the need for refurbishment and general quality maintenance to maintain the upmarket look of Bath. Deterring trade must be deemed negative.*
- *Tradesmen like myself need to carry a lot of tools and materials parking near place of work is essential*

6.6.2 Theme: **Residential parking**

Key Comments

- *Tradesman are deterred by the difficulty in finding convenient parking spaces.*
- *Street parking is essential, especially for single trades people/visits.*
- *Large scale projects - limited to total vehicles per day, per project. Roads frequently blocked by double parking, vehicles left idling and unsafe parking on double yellow lines at junctions.*
- *There also isn't enough availability of parking bays*
- *Seek means of controlling the volume and type of vehicles. Eg limiting delivery vehicles in size and fuel type.*
- *If a business is allowed to have as many permit as they want on one account that surely is open to misuse!!! Permits costs are very low when compared with parking in a car-park - so for business cheap easy parking.*
- *I am concerned that these permits give extended access for numerous vehicles to space-limited resident parking zones.*
- *Tradespeople ask us to provide visitors permits for them. It is an expectation that they have*
- *The price increases should be higher*

6.6.3 Theme: **Shops**

Key Comments

- *transport companies will push the cost on to shop owners*
- *Refuse delivery*
- *How are shops going to get stock*

6.6.4 Theme: **Air Quality**

Key Comments

- *The proposals haven't explained how the change in price will actually reduce air pollution.*

6.6.5 Theme: **Public Transport**

Key Comments

- *How can you expect a plumber to ride a bike to work with all his tools and materials or a chippie to get on the train with a work bench?*
- *It is rarely possible for them to use the park and ride*

- *There are no sustainable alternatives.*

6.6.6 Theme: **Enforcement**

Key Comments

- *roads frequently blocked by double parking, unsafe parking on double yellow lines at junctions*
- *Currently trade vehicles park illegally rather than in the designated bays in our road - this is a daily occurrence. This is because there is NO enforcement*

6.6.7 **Officer Response**

- a. These proposals aim to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods.
- b. The council's overarching objective in managing on street parking is to ensure that the highway is able to operate for its primary purpose, the safe movement of vehicles. Parking on the highway, irrespective of the demand for kerb space, can only be provided where it is safe to do so and where the free movement of vehicles can be maintained.
- c. The Parking Strategy adopted in 2018, set out a number of objectives and actions. This includes a reduction in on street long stay parking in the city centre in order to allocate a greater proportion of spaces for disabled users, residents and short stay visitors. This was further supported by the introduction of the hierarchy of kerb space to allocate limited kerb space using a balanced approach to meet these aims.
- d. Limiting the availability of on street parking for long stay users ensures a higher turnover of the limited parking availability in the central areas.
- e. The council acknowledges that this can have a negative impact on residents and businesses that require maintenance works, and the local businesses that need to undertake this work with access to property.
- f. The trade permit allows the account holder to activate 'pay and display' parking in on street pay and display or resident permit holders only bays. Within the 'inner zone' (which comprises the central zone and zone 1 residents parking zones), where most pay and display parking is available, the charges for activation of a trade stay are chargeable by the hour. This reflects the high demand and low availability for parking within these areas and the increased competition for spaces due to short term use of pay and display parking by both residents and visitors alike.

- g. The current charge for a one hour stay in the inner zone is cheaper than most paid for parking available to the general public and its therefore contrary to the objectives set out the Parking Strategy. This proposal increases the hourly charge so that it's in line with the mid tariff (tariff band 2) for the first hour under new complimentary proposals (see Appendix B - <https://democracy.bathnes.gov.uk/ieDecisionDetails.aspx?ID=1507>) to increase the on street pay and display charges. Unlike pay and display customers, trade permit account holders are able benefit from the convenience of buying parking all day long, exceeding the maximum stay time of any paid for parking (both on street and in council short stay car parks), as well as using residents permit spaces.
- h. The new charge represents an increase of 50p per hour (£3 to £3.50) with increases over the next three years in line with on street charges for paid for parking for residents and visitors
- i. The trade permit is provided to facilitate convenient parking close to a property where a tradesperson may be working, and not to facilitate the delivery or collection of goods.
- j. Trade permit holders are able to take advantage of national exemptions for loading and unloading, meaning they can stop on double yellow lines and in permit holder bays in order to unload tools and materials directly at their destination. Trade permit holders are then able to choose to park with either their trade permit on street (in an appropriate bay), or use paid for locations using the tariffs available to the general public both on street and in car parks if they wish to take advantage of cheaper parking, with the reduced convenience that may also come with this.
- k. A national exemption for loading and loading applies to the delivery and collection of goods, no trade permit is required by vehicles undertaking this activity. Additionally, dedicated loading bays are available across the city to ensure space is available for vehicles to deliver and collect goods.
- l. The council's Civil Enforcement Officers undertake regular patrols of all city centre areas where parking controls exist to ensure restrictions are not abused. Where members of the public believe regular contraventions are taking place, these can be reported to Parking Services on 01225 477133 or Parking@Bathnes.gov.uk so that officers can investigate and take appropriate action. The council is unable to provide a reactive service, however, were regular issues are identified proactive monitoring will be put into place subject to resources being available.

6.7 Review of visitor permit charges

6.7.1 Theme: **Cost**

Key Comments

- *People have every right to have visitors to their own home and it shouldn't be dependent on wealth*
- *We have seen a falling availability of parking, yet the price is going to go up? if you want to ask for more money create a better parking service*
- *£1 50 a day is reasonable just wary that this will turn into £11 50 in the same way that 'resident permits' turned into 'permit holders'*
- *The permit cost rise is largely irrelevant it is the minimum quantity you must buy and the fact that they are time limited for 12 months that are the major factors in the cost for low volume users*
- *I cannot see that an increase in this cost will affect parking at all. I use the permits for workmen and for guests an increase in cost will not change the number of guests or workmen visiting it will just cost me more and I object to that.*
- *other than the fact that there has been no increase since 2013 the council does not make any case for increasing the charge for visitor permits, providing the current charges cover the cost of administering the system there is no justification for an increase*
- *people of bath have gone a year without any visitors due to Covid surely the council should be encouraging people to socialise and have visitors*
- *you are restricting local business visiting residents penalising the elderly and infirm you should not use residents as a method of raising money*
- *I have no problem with the increase in price I would even accept a higher price than you are proposing, however I object to unused permits having a time limit*
- *It is entirely wrong for you to restrict me to purchasing visitor permits in blocks of 100 and then not allowing me to roll them over or claim a refund for unused hours.*

6.7.2 Theme: **Public Transport**

Key Comments

- *nobody is going to stop using their car until public transport gets very much better and very much cheaper.*
- *visitors should be encouraged by free park and ride options.*

6.7.3 Theme: **Accessibility**

Key Comments

- *Bath is not very accessible for those with mobility issues therefore I require to be able to use my visitors permit for her to visit*
- *Many elderly & lonely residents rely upon family & friends to visit & help with shopping & care. This would make those people even more isolated.*
- *For the elderly receiving visitors is extremely important for their mental health, these visits should not be discouraged*

6.7.4 Theme: **Air quality**

Key Comments

- *The issues with traffic and environment in Bath are not related to people visiting friends and family.*

6.7.5 Theme: **On street parking**

Key Comments

- *blue badge holders and residents should be the only private vehicles allowed to enter the city centre for on street parking everyone else should be diverted to the dedicated car parks or park and rides*

6.7.6 **Officer Response**

- a. These proposals aim to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods.
- b. It is important to note that parking permit charges cannot be introduced for the purpose, whether primary or secondary, of raising revenue, even if this revenue was intended to be applied to fund projects meeting the purposes set out in The Road Traffic Regulation Act (1984). The proposals are themselves the measure and mechanism to facilitate the achievement of strategic outcomes of local transport policy to improve air pollution, reduce congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods.
- c. We are proposing a modest increase in daily charges for visitor parking stays, the first time we have done this since 2013.
- d. The proposed charges for visitor permit, at £1.50 for a full day remains significantly below the cost for on street parking in Bath at £2.50 to £3.80 per hour (June 2021 charges).

- e. To provide additional flexibility of use and cost effectiveness, we have proposed a new half day permit (equivalent to 50% of the daily charge) for those wishing to use paper permits in eligible zones.
- f. We recognise that residents may wish visitors to park a vehicle in the zone they are visiting and offer visitor permits as part of the resident parking scheme service.
- g. Visitor permits are purchased in advance by residents and remain valid for 12 months from the date of purchase. This expiry is an important control to ensure that high number of visitor permits cannot be accrued which may lead to an accumulation of permits and a subsequent pressure on available space. Expiring unused permits after 12 months is an effective control to prevent this. Permits may be purchased in small bundles of 100 hours or 10 days (for paper permits) at a time to ensure unused permits are minimised. This bundle size is set at a volume that ensures consistency for both digital and paper types and is based on the lowest charge possible for paper permits where they must be posted to the recipient to ensure no additional handling and postage charges apply.
- h. Permit income funds the provision of the resident parking scheme service. This includes the cost of administration, maintenance, and enforcement of parking restrictions across the zones. It must be operated on a cost neutral basis. We therefore do not provide refunds in the event resident or visitor parking permits are no longer required or expire after 12 months. A valid parking permit does not represent paid for parking or guarantee a space, it provides authorisation for parking within the terms and conditions of the on-street parking permit service.
- i. The proposed increase in charge for visitor permits also aims to encourage behaviour change, by encouraging residents and their visitors to consider the use of more sustainable modes of transport such as public transport, park & ride, walking and cycling. This will help reduce vehicle intrusion in residential areas and help reduce emissions to improve air quality for all.
- j. These proposals compliment a wider council strategy to promote more Liveable Neighbourhoods and reduce pollution. You can find out more information on this strategy online at <https://beta.bathnes.gov.uk/liveable-neighbourhoods-consultation>.
- k. It is a resident's choice if they wish to allocate visitor parking to trades people or other visiting services to their home. Other parking permits are available to professionals when visiting residents in residents parking zones to avoid the need for use of visitor parking permits including trade permits and medical permits.
- l. Limited waiting parking is typically available in many residents parking zones which allow free parking for short periods of up to typically between 2-3 hours.

- m. Bus based public transport is mainly a deregulated service under the Transport Act 1985. Due to the pandemic, most if not all services are currently funded by Central Government, who have spent over £1b to support bus networks during the period since March 2020.
- n. Bath benefits from a Railway station, centrally located as part of the main line to and from the South West. Other local stations for example Keynsham and Oldfield Park provide further local convenience.
- o. Central Government released their “Bus Back Better” Strategy <https://www.gov.uk/government/publications/bus-back-better>. This national strategy sets out the vision and opportunity to deliver better bus services for passengers across England, through ambitious and far-reaching reform of how services are planned and delivered.
- p. Work is underway at WECA to deliver the requirements of the strategy to ensure the West of England has the best possible public transport network that is both efficient and affordable. Accessibility remains a key consideration including the commitment to the requirements of the Public Service Vehicles Accessibility Regulations 2000 to ensure that all our buses are accessible.
- q. As part of the strategy we are required, as part of WECA, to produce a Bus Service Improvement Plan and submit it to Govt by 31 October 2021 as a bid for a share of £3bn Transformation Funding to provide ongoing support to the bus network during recovery and to improve the service offer.
- r. The council continues to support what are classed as socially necessary bus services to the tune of approximately £1.4m per annum through a mixture of funding sources including revenue funding and section 106 money, paid via levy to the West of England Combined Authority who are the Local Transport Authority since the powers transferred in 2018. The council continues to attempt to identify additional funding mechanisms to support services further but this can be challenging in light of other budget pressures.

6.8 Will proposals improve Air Quality

6.8.1 Where themes and issues identified from respondents on their views as to whether they felt the proposals would improve air quality related specifically to other proposals included in this consultation, they have been included within appropriate section to avoid duplication within this report. This includes the following themes identified within this proposal:

- *Air Quality*
- *Costs*
- *Public Transport & sustainable travel*
- *Electric vehicles*

- *On street parking*
- *Vehicle/behaviour change and choice*
- *Clean Air Zone*
- *Enforcement*

6.8.2 Officer Response

- a. All issues and themes raised within feedback to this question are included in Officer responses in sections 6.2 to 6.7.

6.9 Other comments

- 6.9.1 Where themes and issues identified from respondents providing further feedback via the free text 'Other comments' question related specifically to other proposals included in this consultation, they have been included within appropriate section to avoid duplication within this report. This includes the following themes identified within this proposal:

- *Air Quality*
- *Emissions based permits*
- *Hotel permit review*
- *Medical permit review*
- *Visitor permit charges review*
- *Costs*
- *Public Transport & sustainable travel*
- *Vehicle/behaviour change and choice*
- *Electric vehicles*
- *Accessibility*
- *On street parking*
- *Enforcement*

6.9.2 Officer Response

- a. All issues and themes raised within feedback to this question are included in Officer responses in sections 6.2 to 6.7.

- 6.9.3 Other issues raised by respondents that are not part of or within the scope of this consultation, and which therefore have not been responded to are listed below:

- *A36/A46 link road*
- *Introduction of Trams*
- *Relocate the bus and train station out of their central locations*
- *Ban pavement parking*
- *Include cars in the CAZ*

7 Summary

- 7.1.1 A range of proposals affecting on street parking permits were the subject of a public consultation between 27 April and 24 May. These proposals were aimed to address air quality issues through a major shift to mass transport, walking and cycling and incentives to reduce the use of more polluting vehicles in order to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution.
- 7.1.2 These proposals also aim to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods and align with the council policy on Liveable Neighbourhoods.
- 7.1.3 As noted in the National Air Quality Strategy, measures designed to address air quality issues will often have a positive effect on climate change. Whilst these proposals are designed to (1) improve air quality in order to secure the safer movement of pedestrian traffic on the highway, and (2) meet traffic management purposes, it is anticipated that the measures will also reduce the level of emissions that drive climate change, as a result, for example, of encouraging a switch to low emission vehicles.
- 7.1.4 Five on street parking permit proposals were the focus of the public consultation and public views were also sought on new terms and conditions to accompany on street permits and reflect changes included within the proposals. An online survey generated 1,086 individual responses and 3,380 free text comments for analysis.
- 7.1.5 There was broad support for council action to address a widely held view that air quality was important to respondents. However, this was in contrast to the mechanism proposed to encourage behaviour change through the implementation of emissions based residents parking permits with key objections linked to increased cost; the impacts on those on low incomes; and the link to CO2 emissions rather than the Euro standard classification.
- 7.1.6 There was broad support amongst respondents for the hotel and medical permit proposals and the new terms and conditions; however, the outcome for the proposals to increase charges for trade and visitor permits whilst evenly matched was in favour of no support. It should be noted that responses for these two proposals contained a high proportion of 'no strong opinion' of at least 1 in 5 respondents.
- 7.1.7 Within the 3,380 free text responses respondents raised a broad range of themes and issues which have been responded to. The council is assessing issues raised to determine if mitigating measures should be included within recommendations taken forward.

Appendix PPC1: Online Survey Questionnaire

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