

Cabinet

Date: Tuesday, 20th July, 2021

Time: 6.30 pm

Venue: Council Chamber - Guildhall, Bath

Agenda

To: All Members of the Cabinet

Councillor Kevin Guy (Leader of the Council, Liberal Democrat Group Leader), Councillor Dine Romero (Cabinet Member for Children and Young People, Communities and Culture), Councillor Tim Ball (Cabinet Member for Planning and Licensing), Councillor Richard Samuel (Deputy Council Leader (statutory) and Cabinet Member for Economic Development and Resources), Councillor Sarah Warren (Deputy Council Leader and Cabinet Member for Climate and Sustainable Travel), Councillor David Wood (Cabinet Member for Neighbourhood Services), Councillor Tom Davies (Cabinet Member for Adults and Council House Building), Councillor Alison Born (Cabinet Member for Adults and Council House Building) and Councillor Manda Rigby (Cabinet Member for Transport)

Chief Executive and other appropriate officers
Press and Public

The agenda is set out overleaf.



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NOTES:

1. **Inspection of Papers:** Papers are available for inspection as follows:

Council's website: <https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1>

2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

3. **Recording at Meetings:-**

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control. Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators. We request that those filming/recording meetings avoid filming public seating areas, children, vulnerable people etc; however, the Council cannot guarantee this will happen.

The Council will broadcast the images and sounds live via the internet www.bathnes.gov.uk/webcast. The Council may also use the images/sound recordings on its social media site or share with other organisations, such as broadcasters.

4. **Public Speaking at Meetings**

From the 6 May 2021 all formal Council meetings of whatever nature must take place physically. This meeting will be subject to health & safety considerations and social distancing measures. This means that room capacities are significantly reduced, and the visiting public may be prevented from entering a meeting room if it is at capacity. In this period, we encourage people to view the meeting online if possible. Further details are available from the Democratic Services team.

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group.

Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.

Further details of the scheme can be found at:

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942>

6. **Supplementary information for meetings**

Additional information and Protocols and procedures relating to meetings

<https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505>

Cabinet - Tuesday, 20th July, 2021

in the Council Chamber - Guildhall, Bath

AGENDA

1. WELCOME AND INTRODUCTIONS

2. EMERGENCY EVACUATION PROCEDURE

The Chair will draw attention to the emergency evacuation procedure as set out in the Notes

3. APOLOGIES FOR ABSENCE

4. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

(a) The agenda item number in which they have an interest to declare.

(b) The nature of their interest.

*(c) Whether their interest is **a disclosable pecuniary interest** or an **other interest**, (as defined in Part 2, A and B of the Code of Conduct and Rules for Registration of Interests)*

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

5. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

6. QUESTIONS FROM PUBLIC AND COUNCILLORS

Questions submitted before the deadline will receive a reply from an appropriate Cabinet member or a promise to respond within 5 days of the meeting. Councillors may ask one supplementary question for each question they submitted, up to a maximum of two per Councillor.

7. STATEMENTS, DEPUTATIONS OR PETITIONS FROM PUBLIC OR COUNCILLORS

Councillors and members of the public may register their intention to make a statement if they notify the subject matter of their statement before the deadline. Statements are limited to 3 minutes each. The speaker may then be asked by Cabinet members to answer factual questions arising out of their statement.

8. MINUTES OF PREVIOUS CABINET MEETING (Pages 9 - 20)

To be confirmed as a correct record and signed by the Chair

9. CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET

This is a standard agenda item, to cover any reports originally placed on the Weekly

list for single Member decision making, which have subsequently been the subject of a Cabinet Member requisition to the full Cabinet, under the Council's procedural rules

10. MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

This is a standing agenda item (Constitution rule 14, part 4D – Executive Procedure Rules) for matters referred by Policy Development and Scrutiny bodies. The Chair of the relevant PDS Panel will have the right to attend and to introduce the Panel's recommendations to Cabinet.

11. SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING (Pages 21 - 22)

A list of Cabinet Single Member decisions taken and published since the last Cabinet meeting to note (no debate).

12. BATH CITY CENTRE SECURITY (Pages 23 - 312)

The National Counter-Terrorism Security Office (NaCTSO) Counter-Terrorism Security Survey on Bath City Centre in September 2016; identified locations in Bath as a 'Crowded Place'; with particular focus on the areas around Bath Abbey and the Roman Baths. As the 2017 attacks demonstrated, crowded places present attractive targets for terrorists. Subsequently disrupted plots and intelligence assessments suggest this will continue to be the case (Contest Strategy Document 2018).

The report identified where the City is vulnerable and where the overall risk to the City is raised. By taking action to address these identified vulnerabilities, the likelihood and impact and therefore the risk to the area is reduced.

13. BATH CITY CENTRE HIGH STREET RENEWAL (Pages 313 - 390)

A £1.235m funding package to support Bath High Street Renewal has been secured from the West of England Investment Fund's 'Love our High Street' grant programme. A proposal put forward by B&NES Council via a Full Business Case focused on the northern part of Bath City centre, combining targeted public realm interventions with support for events, animation and culture on the streets and in public spaces focused on the Milsom Quarter and Kingsmead Square, together with other city centre wide interventions relating to outdoor trading. The project will support the Council's Liveable Neighbourhoods agenda and seek to respond to the Climate and Ecological emergencies and the transition towards greener, less car dominated and accessible, people friendly High Streets.

This report requests agreement to accept the £1.235m funding from WECA in line with the Full Business Case approved by WECA on 25th June 2021. This report summarises the proposed project scope and includes economic and social impact analysis and a summary of pilot activities and engagement which has informed the project scope. The Report summarises key items of proposed spend, funding approval mechanisms and key deliverables and outputs anticipated.

14. ON STREET PARKING PERMITS AND CHARGES (Pages 391 - 584)

A range of proposals affecting on street parking permits have been developed aimed to improve air quality 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. These proposals are also aimed 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.

15. INVESTMENT IN NEIGHBOURHOOD SERVICES FROM 2022 (Pages 585 - 590)

Neighbourhood Services (highways maintenance, waste, cleansing, fleet, parks & grounds) has delivered significant cashable service efficiencies during the past 10 years. This has resulted in a risk-based approach to delivery of a number of functions and in some cases, decisions have been taken to stop services. The Council has invested additional funding in street cleansing in 21/22 and would like to invest further in Neighbourhood Services to improve standards and reinstate some services. This report provides options for future investment in these high-profile front-line services for 22/23. The Climate Emergency and Sustainability Policy Development and Scrutiny Panel (CES PDS panel) has been consulted on these proposals and will be further engaged as the proposals are developed to be considered through the budget setting process

16. WASTE INFRASTRUCTURE & MODERNISATION PROGRAMME (Pages 591 - 598)

The Waste Infrastructure programme includes the development of previously acquired land at Pixash Lane, Keynsham, to relocate and consolidate Council waste & recycling operations and modernise the existing public Recycling Centre there. Significant progress has been made in recent years, and final approval of capital is now required in order to progress into the final stages of construction and enable relocation in early 2023.

Proposals for re-providing household waste and recycling centres in Bath continue to be developed and appraised so that Bath residents will have uninterrupted access to recycling centres local to them, aligned with the Council's climate and nature priorities. The Council is committed to keeping the public recycling centre at Midland Road open until an alternative is in place for residents of Bath. A supplementary paper outlining more detail on providing at least one recycling centre in the city of Bath is intended to be tabled at the meeting.

17. COMMERCIAL ESTATE REVIEW UPDATE (Pages 599 - 620)

The report provides an update to the Cabinet on the outcome of the Commercial Estate review carried out by Montague Evans during the final quarter of the 2020/21 financial year and sets out the next steps in managing the Council's commercial assets.

18. REVENUE & CAPITAL OUTTURN 2020/21 (Pages 621 - 664)

The report presents the revenue and capital outturn for 2020/21, highlighting an on-budget position after allowing for proposed transfers to reserves and carry forwards. Whilst there has been no movement in the reported position against the Quarter 3 forecast, there has been improvement from an under budget position in Adult Social Care of £4.29m, together with the proactive Financial Recovery measures and Covid

grant funding that has mitigated all other pressures leaving a further net £1.13m underspend. These are one-off benefits which are proposed to be transferred to reserves to support the Council in dealing with the budgetary impact of Covid in 2021/22.

19. REVENUE & CAPITAL BUDGET MONITORING, CASH LIMITS AND VIREMENTS – APRIL TO JUNE 2021 (Pages 665 - 698)

This report presents the financial monitoring information for the Authority as a whole for the financial year 2021/22, using information available as at the end of June 2021.

20. TREASURY MANAGEMENT OUTTURN REPORT 2020/21 (Pages 699 - 716)

This report gives details of performance against the Council's Treasury Management Strategy and Annual Investment Plan for 2020/21.

21. TREASURY MANAGEMENT MONITORING REPORT TO 30TH JUNE 2021 (Pages 717 - 732)

This report gives details of performance against the Council's Treasury Management Strategy for 2021/22 for the first three months of 2021/22.

The Committee Administrator for this meeting is Jack Latkovic who can be contacted on 01225 394452.

BATH AND NORTH EAST SOMERSET

CABINET

These minutes are draft until confirmed as a correct record at the next meeting.

Wednesday, 23rd June, 2021

Present:

Councillor Kevin Guy	Leader of the Council, Liberal Democrat Group Leader
Councillor Dine Romero	Cabinet Member for Children and Young People, Communities and Culture
Councillor Tim Ball	Cabinet Member for Planning and Licensing
Councillor Richard Samuel	Deputy Council Leader (statutory) and Cabinet Member for Economic Development and Resources
Councillor Sarah Warren	Deputy Council Leader and Cabinet Member for Climate and Sustainable Travel
Councillor David Wood	Cabinet Member for Neighbourhood Services
Councillor Tom Davies	Cabinet Member for Adults and Council House Building
Councillor Alison Born	Cabinet Member for Adults and Council House Building
Councillor Manda Rigby	Cabinet Member for Transport

15 WELCOME AND INTRODUCTIONS

The Chair (Councillor Kevin Guy) welcomed everyone to the meeting.

The Chair invited all Cabinet Members to introduce themselves.

The Chair also informed the meeting that speakers will have their opportunity to address the Cabinet before questions from public and Councillors.

16 EMERGENCY EVACUATION PROCEDURE

The Senior Democratic Services Officer drew attention to the evacuation procedure with health and safety notice.

17 APOLOGIES FOR ABSENCE

There were no apologies for absence.

18 DECLARATIONS OF INTEREST

The Deputy Monitoring Officer issued an urgent and temporary dispensation of interest declaration for this meeting only to all Members who either live, work or represent their Wards affected by the Active Travel Plans and Liveable Neighbourhoods items in order that those agenda items may be appropriately debated and determined at this Cabinet meeting.

19 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

There was none.

The Chair used this opportunity to read out the following statement:

'Before we move on, I'd like to give an update on the issue of urban gull nuisance.

As many residents know, the rules around gull controls were made much stricter last year. B&NES needed a new licence from Natural England to carry out treatments, including nest and egg removal. We asked residents to help us by supplying evidence in support of our application.

Under the new licence the bar for intervention has been set very high. Controls may only be carried out to preserve public health or safety and as a last resort if non-lethal measures are ineffective.

This means that in most cases, we are not legally allowed to remove nests or eggs, despite the serious problems they cause, including gull attacks and sleep deprivation.

This is clearly unacceptable, and I have written to Natural England to raise our concerns about the impact on residents. We understand that Natural England are willing to listen to feedback from Councils about how they approach this situation next year.

We are calling for a wider programme of treatments to be allowed and for the intervention benchmark to be reassessed for urban gulls. This would enable us to assist more of our long-suffering residents.'

20 QUESTIONS FROM PUBLIC AND COUNCILLORS

There were 14 questions from Councillors and no questions from members of the public.

[Copies of the questions and responses, including supplementary questions and responses if any, have been placed on the Minute book as Appendix 1 and are available on the Council's website.]

21 STATEMENTS, DEPUTATIONS OR PETITIONS FROM PUBLIC OR COUNCILLORS

Fia Heijltjes (6 years old and accompanied by parent) in a statement [*a copy of which is attached to the Minutes as Appendix 2 and on the Council's website*] addressed her concerns with road safety.

David Redgewell made a statement around traffic and bus issues in West of England Combined Authority as per background paper circulated to the Cabinet in advance of the meeting.

Susan Charles in a statement [*a copy of which is attached to the Minutes as Appendix 3 and on the Council's website*] expressed her concerns about future of parking spaces for Blue Badge holders.

Shiva Page in a statement [*a copy of which is attached to the Minutes as Appendix 4 and on the Council's website*] expressed a number of concerns related to Equality

Impact Assessments on Clean Air Zone, Liveable Neighbourhoods and Active Travel Schemes.

Martin Grixoni in a statement [*a copy of which is attached to the Minutes as Appendix 5 and on the Council's website*] said that he was concerned about misplaced priorities, in particular with recycling and refuse collection.

Allison Herbert in a statement [*a copy of which is attached to the Minutes as Appendix 6 and on the Council's website*] where she highlighted the reasons and benefits of having Bath Christmas Market, and the issues which people mostly complain about, such as access, parking and transport.

Kathryn Davis addressed the Cabinet by supporting Bath Christmas Market as a unique event for local and national visitor experience. Kathryn Davies welcomed the report before the Cabinet by saying that this was an opportunity to deliver an event in 2021 which would provide phenomenal boost to local economy, tourism, and hospitality network.

Charlie Williams said that there would always be those who would be for and against Active Travel Schemes but the Cabinet should stay consistent and continue to combat climate change by trailing and eventually implementing schemes which may not always be popular with all residents.

Jeremy Labram (Chair, Camden Residents' Association) in a statement [*a copy of which is attached to the Minutes as Appendix 7 and on the Council's website*] said that the residents were keen to get into in the Liveable Neighbourhood programme as soon as possible. The association would also like to see the detail of the assessment of the Walcot bid to understand what the project team's misgivings were over complexity and challenge so the residents could start to address those now.

Rachael Hushon in a statement [*a copy of which is attached to the Minutes as Appendix 8 and on the Council's website*] said that residents who live in the lower Lansdown area were grateful to the Council who have recognised that the Kingsmead area and lower Lansdown needed to be looked at in a joined up way with regards to Liveable neighbourhood planning.

Lynda Lloyd in a statement [*a copy of which is attached to the Minutes as Appendix 9 and on the Council's website*] said that she was concerned that the creation of Liveable Neighbourhoods seems to be on a 'Bubble' principle yet the impact was far wider than the immediate community who live within a proposed Liveable Neighbourhood.

Patrick Rotheram in a statement [*a copy of which is attached to the Minutes as Appendix 10 and on the Council's website*] where he expressed his concerns about Camden Low Traffic Neighbourhood, in particular traffic calming measures such as a 20 mph limit and permanent resident parking on Paragon, enforcing the HGV weight limit, and a pedestrian crossing at the unsafe junction of Paragon and Lansdown.

Malcolm Baldwin in a statement [*a copy of which is attached to the Minutes as Appendix 11 and on the Council's website*] said that having spoken in a general context about LTNs at last meeting, it was great to this evening have the opportunity for Cabinet to agree, and hopefully sign-off a process which could lead to

implementation of a number of major environmental and life-style improvements in the city.

Kari Ericsson in a statement [*a copy of which is attached to the Minutes as Appendix 12 and on the Council's website*] expressed her concern about the lack of transport infrastructure, such as pooled cars, buses and taxis, in the delivery of Low Traffic Neighbourhoods, and negative impact that Liveable Neighbourhoods may have on businesses in Bath.

Councillor Joanna Wright in a statement [*a copy of which is attached to the Minutes as Appendix 13 and on the Council's website*] expressed her concerns that the Cabinet has decided not to implement the bus gate on North Road which would give an ammunition to the few who would actively oppose Liveable Neighbourhoods, and in her view this would make Liveable neighbourhoods so much harder to deliver. Councillor Joanna Wright used this opportunity to tender her resignation of the Liberal Democrat Party and said that she would be representing the ward of Lambridge as a Green Party member.

Councillor Michelle O'Doherty in a statement [*a copy of which is attached to the Minutes as Appendix 14 and on the Council's website*] read out a statement from a resident in her constituency in respect to the parking situation around Chelsea Road.

Some members of the public were asked factual questions by the Cabinet Members in order to clarify/verify details and specifics mentioned in their statements.

22 MINUTES OF PREVIOUS CABINET MEETING

RESOLVED that the minutes of the meeting held on Thursday 20th May 2021 be confirmed as a correct record and signed by the Chair.

23 CONSIDERATION OF SINGLE MEMBER ITEMS REQUISITIONED TO CABINET

There were none.

24 MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

There were none.

25 SINGLE MEMBER CABINET DECISIONS TAKEN SINCE PREVIOUS CABINET MEETING

The Cabinet agreed to note the report.

Councillor Richard Samuel wanted to draw Cabinet's attention to the two decisions he has made recently: the discretionary business rate scheme for 21/22 and BANES businesses in hardship by providing 100% relief to qualifying hospitality and leisure businesses for 3 months then falling to 66% for the remaining 9 months of the year,

and a land disposal at less than market value to enable the construction of a new primary school in Keynsham.

26 BATH CHRISTMAS MARKET

Councillor Dine Romero introduced the report by reading out the following statement:

'We need decide tonight whether to proceed with planning, and delivery of the Bath Christmas Market 2021.

As you will recall last year's Christmas market was cancelled due to the rapid increase in cases without the backstop of a mass vaccination program. Uncertainty still remains due to the increases in case numbers, however this increase must be considered alongside the fact that the majority of adults are now being vaccinated, and there are low-far the cases are less severe cases and people are not ending up in our hospitals. Be assured, I am not underplaying the severity of the pandemic, and will along with the local SAGE be keeping an eye on the situation and changes will be made as required.

However, if we are to have the Christmas Market, we need to decide that now. We are already about 4 months behind where we would be in a normal year, if you can remember what that was like!

I am hopeful that all on cabinet will see that we must decide to proceed. The economic wellbeing of the city, and its traders depends on us making the right decision now.

I know some have asked to move the market to Victoria Park for example, but if we did that then the extra business for our hard pressed local traders will be lost, following such a year this could be death knell for many who are hanging on to survival by their fingertips.

The market is ranked in the top 10 of Europe, and attracts 400k visitors each year, with an estimated spend of £32.5 million in 2019. Half of which is spent elsewhere in the city, on food drink, entertainment, travel and other shopping. The market directly or indirectly supports about 500 actual jobs.

We know that greater proportion of visitors to the market are local, with perhaps 40% coming from further afield. But we are not expecting as many visitors this as that not least as we will not be marketing internationally.

As in previous years we will be asking all to travel sustainably, to use the P&Rs, or public transport wherever possible. This will also be the most sustainable market so far, we are clamping down on the use of single use plastics, relishes etc won't be offered in plastic sachets, LED lights will be used throughout, reliance on fossil fuels on site will be replaced by mains fed electricity points.

The market itself will have an increased footprint, while the number of chalets is being reduced from 205 to 161, with spaces built into the arrangement, and the footprint of the overall market will increase. This will help manage social distancing, and help people stay safe.

The high numbers of visitors can be inconvenient for our residents, but we have a range offers to help. These include a residents-only pre-market event, advertised quieter times for those with autism or who appreciate less bustle, and mobility helpers for those who need extra help and support getting around.

I hope all on cabinet will support this paper, and the proposal, and maybe even pop down to the market when it opens. We need this market, the city traders need this to happen, and to be honest I think we could all do with some festive cheer and normality after the last 18 months.'

Councillor Dine Romero moved the recommendations as per report.

Councillor Richard Samuel seconded the motion by saying that business community has suffered greatly during 2020 and 2021, and that the Council working with Bath BID was strongly committed to taking action to stimulate local retail and hospitality economy. The Bath Christmas market has traditionally provided a major economic boost in the run up to Christmas. This was always welcome but this year it was more important than ever to hold the event if this was possible. In reaching the decision a thought has to be given to the likely events over the next 6 months. However, the risk of cancellation must be acknowledged because of the unpredictability of the spread and mutation of the virus and the actions the government may have to take to reduce transmission. It would be impossible to predict what would happen over the next 5 to 6 months and so the decision to proceed has to be tempered both with caution and realism.

RESOLVED (unanimously) that the Cabinet agreed to:

1. Approve the Bath Christmas Market for 2021, from Thursday 25th November to Sunday 12th December, as set out in Appendix one (SAGE proposal).
2. Approve capital budget of £27,200 funded from revenue for the purpose of financing 2021/22 improvements to chalets.
3. Approve the creation of a smoothing capital replacement reserve to be funded from annual profits.
4. Delegate to the Director of Place Management in consultation with the Cabinet Member for Children & Young People, Communities & Culture, SAGE and the Director of Public Health, key gateway decision dates on whether to:
 - (1) Scale back the plans
 - (2) Cancel the event

A decision-making framework incorporating Covid-19 related indicators, national guidance on Covid-19 restrictions and risk mitigation measures is appended at Appendix six. Decision dates will be aligned with financial milestones. This process aims to reduce both risk to public health and pressure on council budgets.

27 ACTIVE TRAVEL FUND SCHEMES

Councillor Sarah Warren introduced the report by reading out the following statement:

'The Cabinet will be considering and voting on this item with regard to amended drawings UBR 3 and 4, now updated on the council website. These corrected drawings show the 'buffer' area at one of the parking bays and bus stops that had been accidentally omitted.

I would like to thank everyone who submitted questions. It hasn't been possible to answer them all before the meeting. If any are not answered either within the report, or through this evening's discussion, they should be emailed to ActiveTravel_FundConsultation@bathnes.gov.uk.

On 14 Mar 2019, a climate emergency was declared here in the Guildhall. Many councillors that day, typically of extensive life experience, told how they had discussed the environmental crisis with their children and grandchildren, before deciding how to vote. Their youngsters had impressed upon them the enormity of the crisis, which looms large in young lives. And vote they did, some of you here tonight, almost unanimously, to reduce emissions to zero by 2030.

We know 29% of carbon emissions in B&NES come from land transport. Our greatest priority for reducing these is for each of us to drive less.

We also face a public health crisis: of obesity, of mental health, of air pollution affecting our lungs. These all originate in part from low levels of physical activity. The great news is that that feeling of the wind in your hair, cycling in safety, is not only great fun, but at the same time, it can help us tackle all of these problems.

Commuting by bike is a great way to build a few minutes of exercise and happiness into your life on a daily basis.

As a Council, the main way we can influence travel behaviour is through the infrastructure on our roads. We know that the biggest impediment to taking up cycling is perceived danger, and we are going to change that in Bath and North East Somerset, starting with the Upper Bristol and Beckford Roads.

Now, you might have noticed, Cabinet, that Bath is not Milton Keynes. Our roads were designed before the advent of cars and even of bikes. There are purist cyclists in this city complaining that our plans are not perfect for cyclists in every way, and at the expense of other road users.

But we know that there are still people in Bath and North East Somerset who don't cycle... (yet). We have listened to all responses as government asked us, and we hear that people have legitimate concerns. On the advice of our expert staff, and in line with best design practice, we have made changes to accommodate businesses and disabled residents, as well as other road users. In response to feedback, we have planned in improvements to pavements, spaces for loading, and additional residents' parking.

Because of our narrow, historic streets, we have compromised cycle infrastructure in some areas, but let's be clear, these cycle routes will still be safer than any current on-road cycle provision in B&NES. And we seek a continuing dialogue with Active Travel England, the new body providing national leadership on cycle infrastructure. We will monitor these schemes' success, and learn from how they work in practice, to inform similar decisions in future.

There have also been complaints that we will not be installing a bus gate on North Road, as consulted on. Well, Cabinet, whilst we are fully committed to providing safe active travel between Bath's valley floor, and the educational institutions and centres of employment on the plateau, the clue was in the name. It was a consultation, and we have listened to all our residents, as government asked us. Many told us that the planned bus gate caused them great concern. We do not intend to join the ranks of Crawley, Horsham, Kensington and Chelsea, in removing cycle lanes and wasting taxpayers' money.

We will work closely with residents and commuters in the coming months to codesign strategic routes and schemes that are the best that we can provide for all, both those who cycle, and those who don't (yet).

Now Cabinet, when you think of a cyclist, what do you imagine? A middle-aged man in Lycra on an expensive, racing bike, travelling at speed with friends on Sunday morning?

The cycle lanes that we will build are the first of many, and they are for mums in skirts with shopping bags, and children in uniform with satchels. They are for grans on e-bikes on their way to the RUH, and delivery drivers with e-cargo bikes.

Cabinet, this evening's decision is not about "cyclists" – in quotation marks – or indeed in lycra. We will build excellent infrastructure for all residents and visitors to enjoy. We will build it for our families and for our businesses. We will build it for our young people and for our older residents, for work and for play. This is what those who voted to declare a climate emergency, voted for. This is climate action. I commend this paper to you. Please back these proposals to commit the funds to progress these schemes to the next stage.'

Councillor Sarah Warren moved the recommendations as printed in the report, with an addition of the following recommendation:

7. Delegate to the Cabinet Member for Climate and Sustainable Travel, along with the Director of Place Management to make final decisions on details for resolutions 1 to 6, and to report back to Cabinet should there be any significant departure from the recommendations.

Councillor Manda Rigby seconded the motion by saying that everyone should be able to see the benefit in creating an environment where walking and cycling would be perceived as safe choices when making a journey, and those who really need to use their car could do so with fewer other vehicles on the road. Councillor Rigby also welcomed the fact that the schemes have been amended after receiving the consultation input from the residents. Councillor Rigby said that credit must be given to Councillors Warren and McCabe, and the officers for working so hard to find a deliverable set of proposals which, whilst not giving any one section of the community 100% of what it initially wanted, has brought people together to understand the benefits of the current proposal. Councillor Rigby added that she would be looking forward to the setting up of a citizens jury, or similar, to examine the issues round travel to the University of Bath as a whole, and that such a working arrangement can show that it was possible to be both ambitious in aims, and considerate in implementation. Councillor Rigby finished her statement by saying that from her personal perspective, it could be possible to be a supporter of active travel whilst still not supporting non-working elements of the schemes originally presented.

Councillor Richard Samuel welcomed the report by saying that in a city such as Bath creating these safe routes was very challenging due to the historic layout of the city. Many roads were narrow and congested, and in some areas car ownership was very high with little road space available due to parking. Road widths were often narrow reflecting historic patterns of land values that reduced the size of these spaces. In setting out the schemes before the Cabinet today there has been an enormous amount of work and discussion to reach the proposals on the table. It has to be acknowledged that not all the original proposals were popular with the residents directly affected, but what was now before the Cabinet offers the best mix of achievability and value for money.

Councillor Alison Born also welcomed the report by saying that she was happy to support the current plans going out to consultation and she would be looking forward to further pedestrian and cycle friendly measures being introduced across the city in the coming months and years. It was imperative for the Council to consider the feedback from the consultation as these modified schemes would support and encourage active travel (both walking and cycling) which would help to improve the health and wellbeing of our citizens by enabling them to move around the city more

safely, and also take into account the everyday needs of the residents and businesses that were directly affected by the introduction of the cycle lanes.

Councillor Tom Davies welcomed the report by saying that the Active Travel Schemes would seek to rebalance the way in which we travel around our area and tackle the great challenges of pollution, the climate emergency and improving our health and wellbeing. Councillor Davies added that this would enable families, neighbours and residents who enjoy cycling to start take to the streets and roads with confidence helped further by the huge growth in e-bikes and scooters. Councillor Davies thanked everyone who responded to the consultation and he was delighted that the Council was able to invest additional funds in this cycling infrastructure, in addition to anything provided by WECA and central government.

The rest of the Cabinet also welcomed the report, thanked to all those who have provided their feedback in the consultation, and acknowledged the work of the relevant Cabinet Members, Cabinet Assistants and officers on this matter.

RESOLVED (unanimously) that the Cabinet agreed to:

- 1 Approve proceeding to the Traffic Regulation Order stage of consultation for the amended Upper Bristol Road scheme (as outlined within the report);
- 2 Approve proceeding to the Traffic Regulation Order stage of consultation for the Beckford Road cycle lane scheme;
- 3 Agree that, should the Upper Bristol Road and Beckford Road schemes go ahead following the Traffic Regulation Order stage, a review of both schemes should be undertaken once they have been in place for 12 months;
- 4 Agree that officers explore external funding streams to cover the £140,438 difference between the Active Travel Fund allocation and the cost of the Upper Bristol Road and Beckford Road proposals. If such funding cannot be secured, delegated approval will be sought to use the £150,000 funding already allocated in the 2021/22 Transport Improvement Fund for the development of walking and cycling schemes;
- 5 Agree that officers should commission a citizens' jury or other suitable process of deep public engagement, to determine the most appropriate safe, strategic cycle route to improve between the city centre, the University of Bath and the large employment and education sites in the Claverton Down area, which will take place before the end of this financial year;
- 6 Approve proceeding to the Traffic Regulation Order stage of the Combe Down to University of Bath scheme as part of the wider business case development work being undertaken to improve walking and cycling routes between Combe Down, the city centre and the University of Bath.
7. Delegate to the Cabinet Member for Climate and Sustainable Travel, along with the Director of Place Management to make final decisions on details for resolutions 1 to 6, and to report back to Cabinet should there be any significant departure from the recommendations.

28 LIVEABLE NEIGHBOURHOODS

Councillor Sarah Warren introduced the report by reading out the following statement:

'Liveable Neighbourhoods are residential areas where road space is reconsidered. They create pleasant outdoor environments in which people can relax and socialise

and enjoy spending time. They are safe, welcoming spaces for outdoor activity, where neighbours are able to make more connections with one another, and they make for vibrant local high streets where people want to spend time and money. To create these schemes, a range of measures, which may include vehicle restrictions, traffic calming, residents' parking zones, additional planting, and electric vehicle charging, are used to reduce the dominance of motor vehicles in residential areas, although people are still able to access their homes by car. By making it safer to move around actively, such measures enable more journeys to take place on foot and have been demonstrated over time to reduce the number of journeys taken by car. This may even reduce congestion on the roads for those with no alternative but to travel by car.

They will not disadvantage, and should actively assist disabled people, by incorporating wider pavements and disabled parking spaces where needed, and by enabling more people who can, to leave their cars at home.

The schemes are an important part of the council's wider programme of works aiming to reduce carbon emissions, improve air quality, enhance road safety, and promote healthy lifestyles by encouraging the use of sustainable transport. They will breathe new life into residential areas and improve the quality of the public realm.

The programme builds upon our pioneering project bringing in the first charging Clean Air Zone outside London earlier this year.

Some have expressed concern about traffic displacement, and about air quality impacts outside the schemes. Whilst displacement can be an issue in the initial few days, over the weeks that follow installation, a new pattern of traffic flow develops, as people find new routines – and fewer of these new routines will involve a car.

However, we do recognise people's real worries, so as for the Clean Air Zone, we will commit to monitoring locations of concern, so that we can determine the facts, and take action if necessary.

Cabinet adopted our Liveable Neighbourhoods policy on 10th December 2020 following a consultation on the principles, which received over 1,500 responses, demonstrating overwhelming support for the concept.

47 schemes were submitted, and tonight, Cabinet, I am bringing forward to you the first 15 that we are proposing to take forward for detailed community consultation and design, the next stages in the process. 12 of these are in Bath, and 3 in North East Somerset, reflecting the fact that many more Bath councillors made submissions.

This is absolutely not a policy, however, that can only work in cities, and I would strongly encourage all North East Somerset councillors to reconsider, ahead of the next deadline on 5th August, whether their residents might also benefit, along with people in Bath, from a pleasanter public realm, and calmer residential areas. I am sure that every ward has a spot with too much through traffic, and I would encourage all councillors to engage their communities in identifying these.

Prioritisation of submissions was carried out using a scoring matrix including factors such as: number of affected households, severity of issues, level of through traffic, community deprivation index, and impact on routes to school – but also factors to do with the logistics of implementation. So, in the first instance, we aim to complete relatively simple schemes, saving complex ones for when we have gained organisational learning from earlier projects.

For the first phase of schemes, residents, businesses and local organisations will be consulted and given the opportunity to work with councillors, with preliminary designs prepared, starting in the autumn. There will then be further public consultation, before detailed designs are drawn up and the first schemes implemented.

All schemes judged to be deliverable will be delivered in due course, and work to design Phase 2 schemes will follow on from Phase 1. Indeed, as we consult and

listen to residents, it is possible that some schemes in Phase 1 may fall by the wayside, and projects in Phase 2 may be brought forward more rapidly. Several schemes will be installed by 2023, and designs completed on others so that they can progress rapidly when funds and capacity permit.

Cabinet, Liveable Neighbourhoods were a manifesto commitment, forming a key pillar of our administration's plans to improve public health, and enable sustainable transport choices. They will create connected, healthy, vibrant communities where motor vehicles are less dominant, improving the local environment for residents, and fostering conditions where people are enabled to use alternatives to the private car. I commend this report to you and ask you to approve provisional allocation of £2.2m funding for the development and delivery of the first 15 schemes, over the next two financial years.'

Councillor Sarah Warren moved the recommendations.

Councillor David Wood seconded the motion by saying that he was delighted to support this report which would be applicable not just to Bath but also to rural areas of North East Somerset. This report was about giving power back to our residents who have helped the Council in identifying what the problems were in their communities.

Councillor Dine Romero welcomed the report and added that she would want to see more about arrangements regarding traffic that may be displaced.

Councillor Alison Born welcomed the report by saying that these schemes were the start of the move to reduce dominance of cars in our streets, and to support the development of communities where people should feel that children can travel to school safely independently, and where people can interact without the ever present threat and fast moving through traffic.

Councillor Manda Rigby also supported the report by saying that the schemes going forward were on the agenda because of requests from the community, and the same community would be involved and consulted on further schemes. Councillor Rigby added that the administration was committed to raising the quality of where all of our communities live, and this was just a starting point.

Councillor Tom Davies also welcomed the report by saying that, designed well with engagement with local residents, Liveable Neighbourhoods have the ability to transform our communities - making our neighbourhoods safer, healthier and ultimately happier places for all. Councillor Davies thanked to all involved in the production of this proposal and said that he would be looking forward to the next few months to see the transformative impact of these new Liveable Neighbourhoods on our communities.

Councillor Tim Ball also welcomed the report and added that by implementing these schemes the Council should make sure that there was nobody adversely affected by these schemes.

Councillor Richard Samuel also welcomed the report by saying that this was the beginning of the rebalancing of local priorities away from the dominance of vehicles in streets across B&NES and towards less intrusive environments for residents. The response from local communities and their ward councillors has been tremendous and this report now moves that to the next level. Councillor Samuel announced that

in preparing the 22/23 budget he would intend to commit further capital funds to this programme to enable it to extend further in 22/23 and beyond into 23/24. The precise amounts would not be announced today but would be determined once the impact of the schemes being announced today has been assessed.

RESOLVED (unanimously) that the Cabinet agreed to:

1. Approve the priority list of phase 1 liveable neighbourhood areas to be progressed as outlined in section 3.11 to 3.12 of this report.
2. Note schemes will be considered in consultation with other workstreams.
3. Approve expenditure of £1m from £2.2m allocation (£1,700k in 2021/22 and £500k in 2022/23) for liveable neighbourhoods within the Transportation Delivery Programme Provisional Approval. This will provide funding to support project activity outlined in 3.14 up to detailed design in 2021/22 and provide some funding to deliver priority schemes that are aligned with other portfolio priorities and capable of early implementation.
4. Full approval of balance of funding for programme delivery to be delegated for approval by the Director of Place Management in consultation with the Cabinet Member for Climate and Sustainable Travel and the Cabinet Member for Economic Development and Resources as schemes become ready for implementation.

The meeting ended at 9.00 pm

Chair _____

Date Confirmed and Signed _____

Prepared by Democratic Services

Bath & North East Somerset Council

Cabinet Single-Member Decisions and Responses to Recommendations from PDS Panels

published from 14-June-2021 to 8-Jul-2021

Further details of each decision can be seen on the Council's Single-member Decision Register at <http://democracy.bathnes.gov.uk/mgDelegatedDecisions.aspx?&dm=3>

E3290 Stanton Drew Neighbourhood Plan

Decision maker: Cabinet Member for Planning

Decision: Not before 26th Jun 2021

Lead officer: Richard Daone

Decision status: Approved

Notice of proposed decision first published: 25/05/2021

E3291 Freshford Community Right to Build Order

Decision maker: Cabinet Member for Planning

Decision: Not before 26th Jun 2021

Lead officer: Richard Daone

Decision status: Approved

Notice of proposed decision first published: 25/05/2021

E3286 Amendment to B&NES Local Development Scheme

Decision maker: Cabinet Member for Planning

Decision: Not before 26th Jun 2021

Lead officer: Simon De Beer

Decision status: Approved

Notice of proposed decision first published: 20/05/2021

E3282 Test and Trace Support Payment Policy extension

Decision maker: Cabinet Member for Economic Development and Resources

Decision: Not before 12th Jun 2021

Lead officer: Damien Peak

Decision status: Approved

Notice of proposed decision first published: 04/05/2021

E3302 Adoption of Locally Listed Heritage Assets Supplementary Planning Document

Decision maker: Cabinet Member for Planning

Decision: Not before 28th Jun 2021

Lead officer: Caroline Power

Decision status: Approved

Notice of proposed decision first published: 08/06/2021

Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Cabinet	
MEETING/ DECISION DATE:	20 July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3278
TITLE:	Bath City Centre Security	
WARD:	Kingsmead	
AN OPEN PUBLIC ITEM/LIKELY TO BE TAKEN IN EXEMPT SESSION		
<p>List of attachments to this report:</p> <p>Appendix 1 – NaCTSO Report – EXEMPT – LGA Exemption 7 - Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime</p> <p>Appendix 2 – Correspondence from Chief Constable – Avon & Somerset Police – February 2019</p> <p>Appendix 3 – Proposed Bath City Centre Security Map</p> <p>Appendix 4 – Correspondence from Chief Constable – Avon & Somerset Police – May 2021</p> <p>Appendix 5 - Proposed HVM for Protective Measures</p> <p>Appendix 6 – City Centre Legal Advice</p> <p>Appendix 7a to 7h– Risk and Impact Assessments</p> <p>Appendix 8 – Equality Impact Assessment</p> <p>Appendix 9 – Accessibility Study</p> <p>Appendix 10 – Consultation Report</p> <p>Appendix 11 – Additional Feedback Report from 19 May to 1 June 2021</p>		

1 THE ISSUE

- 1.1 The National Counter-Terrorism Security Office (NaCTSO) Counter-Terrorism Security Survey on Bath City Centre in September 2016; identified locations in Bath as a ‘Crowded Place’; with particular focus on the areas around Bath Abbey and the Roman Baths. As the 2017 attacks demonstrated, crowded places present attractive targets for terrorists. Subsequently disrupted plots and intelligence assessments suggest this will continue to be the case (Contest Strategy Document 2018)

- 1.2 The report identified where the City is vulnerable and where the overall risk to the City is raised. By taking action to address these identified vulnerabilities, the likelihood and impact and therefore the risk to the area is reduced.
- 1.3 The impact of terrorism can include death and injury to the general public, staff and customers, economic harm and disruption to businesses and reputation and loss of public confidence. The likelihood of such an attack taking place is based on a combination of threat and vulnerability. There is currently no specific intelligence to suggest that Bath is under increased threat. The current general terrorist threat to the UK is 'substantial' which means that an attack is likely. Such an attack could take place anywhere in the UK.
- 1.4 Since 2016 the Council and South West Counter Terrorism Advisors (CTSA's), with Avon & Somerset Police, have worked together on preventative measures to reduce the risk of a terrorist attack in the City. These include temporary hostile vehicle mitigations (HVM) for events, such as the Christmas Market and Remembrance Services and specific training for CCTV operatives, front-line staff, managers, and senior officers across private, public and third sector organisations, including regular deployments of Avon & Somerset Police's Project Servator teams.
- 1.5 The Council with CTSA's have focussed attention on areas identified as crowded places, with the Chief Constable of Avon & Somerset Police writing to the Council on 21 February 2020 (Attached at Appendix 2) to recommend the Council introduce an Anti-Terrorism Traffic Regulation Order ("ATTRO") in respect of all roads within the area defined within the map attached as Appendix 3.
- 1.6 The Council is now required to make a decision on a proportionate response to the Chief Constable's letter, which also takes into account the Council's duties under the Equality Act 2010 and public consultation carried out from November 2020 to January 2021, with consideration to the Accessibility Study and subsequent recommendations

2 RECOMMENDATION

The Cabinet is asked to:

- 2.1 To approve the TRO (for anti-terrorism purposes) for advertisement such that it would operate between 1000 hours and 1800 hours on the following streets:
 - (1) Lower Borough Walls, Stall Street, including Abbeygate Street, Abbey Green, Swallow Street (South), Bath Street and Hot Bath Street
 - (2) York Street
- 2.2 To approve the TRO (for anti-terrorism purposes) for advertisement such that it would operate between 1000 hours and 1800 hours on the following streets:
 - (1) Cheap Street, Westgate Street, Saw Close and Upper Borough Walls

with access to the restricted streets also being provided to Blue Badge Holders, carers transporting Blue Badge Holders, and taxi's transporting Blue Badge Holders. Access would be provided via Controlled Authorised Access by the Council's CCTV team.

2.3 To advertise the TRO between 1800 hours and 2200 hours on York Street, to reflect its proximity to the Roman Baths and to support the increased footfall from Terrace Walk through York Street to the new Clore Learning Centre and World Heritage Centre. The Roman Baths, Clore Learning Centre and World Heritage Centre will, at times, will be open late into the evening.

2.4 To note that we will not advertise the TRO between 2200 hours and 1000 hours on York Street.

2.5 To note that we will not advertise the TRO between 1800 hours and 1000 hours for the following streets:

(1) Lower Borough Walls, Stall Street, including Abbeygate Street, Abbey Green, Swallow Street (South), Bath Street and Hot Bath Street

(2) Cheap Street, Westgate Street, Saw Close and Upper Borough Walls

when the streets are not deemed as crowded, based on footfall data and the security risk is not considered to be proportionate to the terrorist threat.

ATTRO - 1000 to 1800 hours with no blue badge access	ATTRO – 1000 to 1800 hours with blue badge access	TRO - 1800 to 2200 hours	No TRO 2200 to 1000 hours	No TRO 1800 to 1000 hours
York Street Lower Borough Walls Stall Street Abbeygate Street Abbey Green Swallow Street (south) Bath Street Hot Bath Street	Cheap Street Westgate Street Saw Close Upper Borough Walls	York Street	York Street	Lower Borough Walls Stall Street Abbeygate Street Abbey Green Swallow Street (south) Bath Street Hot Bath Street Cheap Street Westgate Street Saw Close Upper Borough Walls

2.6 Delegate to the Director of Place Management in consultation with the Cabinet Member for Transport the operational management procedures for access to the restricted streets.

2.7 To note that subject to investigations which are currently taking place on vault survey works, to determine exact locations, based on engineering design options, a series of suitable Hostile Vehicle Mitigation (HVM) measures to be installed at the entrance/exit to the following streets within the city centre. Exact locations to be delegated to Director of Place Management in consultation with Cabinet Member for Transport, with access provided via Controlled Authorised Access by the Council’s CCTV team:

(1) York Street

(2) Cheap Street

(3) Upper Borough Walls

(4) Lower Borough Walls

(5) Hot Bath Street

2.8 To note that subject to investigations, enhance existing street furniture with a series of public realm HVM measures to the following streets:

(1) Old Bond St (North)

(2) Burton St (North) (incl occasional access)

(3) New Bond St Place (North)

(4) New Bond St Place (South)

(5) Northumberland Place

(6) The Corridor

(7) Barton St/ Saw Close (incl occasional access)

(8) Seven Dials (incl occasional access)

(9) Chandos Buildings (West)

(10) Hetling Court (West)

(11) Beau St (East) (incl occasional access)

(12) New Orchard St (East) (incl occasional access)

(13) Southgate St (south)

(14) Kingston Buildings (Orange Grove)

2.9 To note the recommended series of mitigation measures, to support the City Centre Security programme, as highlighted in the Accessibility Study, namely:

(1) Additional seating to be installed on Cheap Street and Westgate Street

(2) Dropped kerbs and footway surface improvements to allow improved accessibility from existing city centre car parks and proposed additional blue badge bays.

(3) Provide additional blue badge and loading bays (as detailed in 3.20 below)

(4) Clear and accessible Communications Plan

2.10 To note that recommended additional measures, in a phased approach, from both the Consultation Report and Accessibility Study will be considered as part of wider Bath City Centre public realm and transport improvement programmes, with an holistic approach, working with Accessibility Groups, businesses and residents. This request is subject to approval of the revenue and capital budget provisions by Cabinet and Council as part of the council's budget setting process.

- 2.11 Advertise TRO's as necessary for all the restricted streets to prevent all waiting, except for the provision of parking for Blue Badge Holders and loading/unloading for specific time periods
- 2.12 Enable the TRO (for anti-terrorism purposes) restrictions to prevent access by Blue Badge Holders, and identified delivery vehicles, should the National or local security risk increase to severe or critical, and as advised by the Police, either for an unplanned incident or planned event, ie Bath Christmas Market/Remembrance Services, as per the Operational Management Procedures.
- 2.13 To note the resource implications set out in section 5 of the report, final scheme design and financial implications will require the approval of the Chief Financial Officer and Deputy Leader and Cabinet Member for Resources and Economic Development.

3 THE REPORT

- 3.1 The Council has a responsibility to keep residents, businesses and visitors safe. Furthermore, the Council has a duty to consider the impact of all their functions and decisions on crime and disorder in their local area.
- 3.2 Why Bath? Counter Terrorism colleagues in the South West at the request of the Home Office completed a Crowded Places Assessment across the region. This is in part predicated by the following:
 - a) The international profile of the city as a tourist destination
 - b) The high volume of visitors to the city, particularly during the summer months and attendance at events such as the Christmas Market
- 3.3 The Home Office directed CTSA's to start dialogue with this local authority on measures to strengthen our city through physical and non-physical security arrangements. It should be noted that we are one of a small number of localities across the south west that have been highlighted as a higher risk.
- 3.4 Our work with Avon and Somerset Police and Regional Counter Terrorism Security Advisors (CTSA's) has been ongoing for some time. A partnership steering group was established in 2018 and comprised of CTSA's, B&NES Neighbourhood Policing Team and Council Officers from Emergency Management, Highways, Transport, Public Realm and Legal, with regular input from the Centre of the Protection of National Infrastructure. The council takes the security of the city very seriously and from the very beginning this work has been undertaken in partnership with Avon & Somerset Police and CTSA's. We have taken advice and guidance on the proportionate approach to the national threat assessment and considered the local risk profile of our city.
- 3.4 By way of background, in 2017 the Council was approached by CTSA's for a conversation about security arrangements for the Christmas Market. As a result of a joint risk assessment with police colleagues action was undertaken.
- 3.5 Following this initial work, further work was undertaken in 2018 including improvements to bollards in the city centre, and officer's undertaking training at the Centre for Protection of National Infrastructure. Work was carried out in

2019 by a specialist HVM Consultant together with liaison with other Council's, Members and other internal Service areas within B&NES. Liaison with key stakeholders including Bath Business Improvement District (BID) was carried out in 2020, and workshops were held with the Council's Heritage teams. Following the Covid-19 lockdown in March 2020, temporary access restrictions were installed in the City Centre, in accordance with advice from CPNI.

- 3.6 Consultation on the Council's permanent proposals for HVM in the City Centre was undertaken between November 2020 and January 2021. Close liaison with the Police and CTSA's was continued during 2020 and 2021
- 3.7 Risk Assessments have been carried out on security and impacts. However, the footfall figures captured in the Bath Improvement District report (Pre-Covid Figures) in Bath City Centre shows that there is considerable reduction in the footfall in the City Centre and crowded place area identified in the NaCTSO report in 2016 after 1800hrs, which lowers the potential of an incident.
- 3.8 Further to the initial ATTRO request and resulting engagement with the Council the Chief Constable of Avon and Somerset Police wrote to Bath and North East Somerset Council in March 2020 agreeing to amend the request of an Anti-Terrorism Traffic Regulation Order ("ATTRO") in respect of the roads which are identified as crowded places within the inner core of Bath City Centre (shown in Appendix 3). Further to the advice given to the Chief Constable by his CTSA's and the Centre of Protection of National Infrastructure on this matter, the Chief Constable is of the view that the restriction of traffic from the main crowded areas at peak times is proportionate, and he would welcome and support any scheme that limited vehicular access to these areas. Letter attached at Appendix 4.
- 3.9 Cabinet is also required to take into consideration the following:
- 1) Changes in threat levels nationally and our response, review of national risk assessments
 - 2) On-going review of any intelligence, including locally and especially linked to planned events, ie Remembrance Services, Bath Half Marathon and Christmas Market
 - 3) The Government is currently consulting on a national 'Protect Duty'

The Protect Duty is proposed to be a legal requirement for public places to ensure preparedness for and protection from terrorist attacks.

The Protect Duty delivers on the Government's manifesto commitment to improve the safety and security of public venues and spaces, drawing on lessons learned from previous terrorist incidents.

The proposals have been championed by victims' groups, including the Martyn's Law campaign, which was established by Figen Murray, who tragically lost her son, Martyn, in the Manchester Arena attack in 2017

- 3.10 A City Centre Security public consultation exercise was carried out between November 2020 and January 2021 regarding plans to further strengthen city

centre access restrictions and install new purpose-designed street furniture to provide permanent enhanced safety for people in areas of high footfall in Bath City centre. The details of the Consultation exercise are set out in the Consultation section below.

3.11 The City Centre Security scheme proposals include for Hostile Vehicle Mitigation (HVM) measures to be installed at the entrance to the following streets within the city centre:

- a) York Street
- b) Cheap Street
- c) Upper Borough Walls (this will be at the exit location from the one-way road system)
- d) Lower Borough Walls
- e) Hot Bath Street

3.12 To note that subject to investigations, enhance existing street furniture with a series of public realm HVM measures to the following streets:

- a) Old Bond St (North)
- b) Burton St (North) (incl occasional access)
- c) New Bond St Place (North)
- d) New Bond St Place (South)
- e) Northumberland Place
- f) The Corridor
- g) Barton St/ Saw Close (incl occasional access)
- h) Seven Dials (incl occasional access)
- i) Chandos Buildings (West)
- j) Hetling Court (West)
- k) Beau St (East) (incl occasional access)
- l) New Orchard St (East) (incl occasional access)
- m) Southgate St (south)
- n) Kingston Buildings (Orange Grove)

3.13 The proposed HVM is for protective measures at the entrance/ exit to each street, with public realm improvements providing protection on the footways, as shown in Appendix 5. These measures have been tested against PAS 68 and have been given a rating which states they will protect from 7.5 tonne

vehicles at approach speeds of up to 50mph. The vehicle access points will be controlled and operated by the Council's CCTV control room.

- 3.14 Stall Street's current TRO does not allow access for vehicles between 1000 hours and 1800 hours and to reintroduce traffic into this street, will have an adverse impact on public safety, as the expectation of those accessing the street is that vehicles are not permitted. To allow vehicles access would also increase the security risk. Therefore, it is not proposed to allow blue badge holders access through this area.
- 3.15 York Street leads to the Roman Baths and with the opening of the new Clore Learning Centre, and coach drops offs in Terrace Walk, footfall in this area will be high. The Roman Baths opens until 2200 hours during the summer and late at Easter, with regular evening private functions throughout the year. The Clore Learning Centre is due to open until later into the evening on selected evenings, hosting special events including those for children and adults with 'hidden' disabilities, ie autism or dementia. Due to footfall remaining high to one of identified crowded places, in and around the Roman Baths and the associated security risk, it is recommended York Street remains closed until 2200 hours, with a TRO supporting the ATTRO.
- 3.16 Since York Street is not a through route for motor traffic and there is no turning area, any motor vehicle that enters either has to reverse back out into Terrace Walk or small cars can attempt to turn around, which requires several forward and reverse manoeuvres, in order to get back out. This will create a public safety issue and increase the risk of harm. Due to this and the increased footfall in the road from the Clore Learning Centre, it will not be possible to allow blue badge holders or residents to park here. There will be an exemption for goods and waste vehicles only, who are able to use banksmen and/or reversing signals to egress from the road allowing them to safely manoeuvre and meaning the above identified risk is removed or lessened significantly.
- 3.17 A preliminary Road Safety Audit has been carried out on Cheap Street, Westgate Street, Sawclose and Upper Borough Walls to determine whether, by permitting blue badge holders vehicular access, the current Pavement Licences on Cheap Street, Westgate Street and Upper Borough Walls can remain, along with additional seating areas on Cheap Street and Westgate Street, to support the recommendations of the Access Study. The preliminary audit confirms both the pavement licences can remain and seating introduced.
- 3.18 All germane legislation has been considered; security is clearly the aim of the ATTRO however; the Councils public sector equality duty must also be considered in relation to those with protected characteristics. It is considered, on balance, that allowing blue badge access to Cheap Street, Westgate Street, Saw Close and Upper Borough Walls, but not, as stated above Stall Street, Abbeygate Street, Green Street, Bath Street, Hot Bath Street and York Street, allows the public sector equality duty to be discharged, by providing those with blue badges access, whilst still maintaining security and limiting the impact on the principle of the ATTRO.
- 3.19 It is essential that the function of the Traffic Regulation Order to minimise anti-terrorism and maintain security is achieved however the Council also recognises that this may cause difficulties for some and have tried to mitigate

this. As recommended in the Accessibility Study, access will be allowed for those who are eligible for a blue badge, subject to the availability of parking. This is a reasonable adjustment whilst still managing the security risk.

- 3.20 Further, the introduction of the city centre security will not result in any loss of either residents or blue badge holder provision the above therefore allows for a reasoned and balanced approach to access whilst ensuring the most vulnerable are safeguarded. In addition, Blue Badge Holders are permitted to park on Cheap Street, Westgate Street and Upper Borough Walls on double yellow lines for a period of 3 hours, subject to space being available.

Road	Loss of BB Bays	Loss of Residents Bays
York Street	2	4
Lower Borough Walls	0	1

Road	Additional BB Bays	Additional Residents Bays	Additional Loading Bays
Westgate Buildings	4		2
Orange Grove	4		
Henry Street		2	
Broad Street		3	
Terrace Walk			2 (0800 to 1000)

- 3.21 Additional seating will be provided along Cheap Street and Westgate Street at as close to 50m intervals with existing street furniture as possible, to ensure there is adequate resting space to allow the street to be used more easily. 'Parklets' are proposed, which will be located on street and be accessible from the footway to avoid extra clutter and obstacles of furniture on the narrow footways.
- 3.22 The parklets will be fully accessible, level with the footway and can accommodate wheelchair circulation. The parklets can include a range of seating types, including perch seating and those with backrests and armrests. Visual clarity will be designed into the parklets, with bold colours used that contrast with the immediate surroundings and surfaces.

4 STATUTORY CONSIDERATIONS

4.1 The Council's Statutory consideration relate to:

- Anti-Terrorism Traffic Regulation Orders in accordance with the Road Traffic Regulation Act 1984 (Section 22C)
- Traffic Regulation Orders in accordance with the Road traffic Regulation Act 1984 (Section 1, 22(D) and Part III of Schedule 9 (and paragraph 20(1) in particular))
- The Public Sector Equality Duty of the Council in accordance with Section 149 of the Equality Act 2010

- Sections 6 and 17(1) of the Crime and Disorder Act 1998 in relation to strategy and crime and disorder implications
- Sections 16 and 18 of the Traffic Management Act 2004 in relation to traffic management
- The proposed Protect Duty (“Martyn’s Law“) legislation for which a consultation is shortly to be launched and would require public places and venues to improve security
- There are several statutory and legal risks that must be considered please refer to the advice note (Appendix 6)

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The City Centre Security proposals have an approved budget of £674k, with a spend to date of £307k. This budget is sufficient to complete ground investigations, finalise design and undertake contract tendering.
- 5.2 A Provisional Capital Budget of £2.356m is also earmarked to implement the scheme. Current estimates forecast a cost of up to £2.756m which represents a £400k funding gap against the provisional capital budget. This will be reviewed through the capital strategy group to identify and agree how this can be mitigated through the scheme design and / or alternative funding sources being identified.
- 5.3 When final estimates for the scheme are confirmed and full approval of capital budgets are sought through the normal capital approval process, the level of contingency required will be reviewed. Funding for any additional contingency will be sought from the Corporate Capital Contingency budget, which is currently £2.172m. Approval for use of the Corporate Capital Contingency is delegated to the Chief Financial Officer in consultation with the Deputy Council Leader, Economic Development and Resources.
- 5.4 The proposed scheme is likely to incur additional operating costs that are unavoidable, when implemented these costs will need to be understood and if they cannot be contained within the portfolio budget they may result in a budget pressure that will need to be considered through the 2022/23 budget setting process.

6 RISK MANAGEMENT

- 6.1 Risk and impact assessments (listed in Appendix 7a to 7h) have been carried out for risks to security and impacts on the disabled, residents of the restricted streets and businesses/deliveries within the restricted streets. The risk and impact assessments undertaken have been undertaken, in compliance with the Council's decision-making risk management guidance.
- 6.2 Due to the significant differences between risks to security and associated impacts on wellbeing and livelihood in terms of impact and the number of people affected, the rating results of the risk and impact assessments cannot be compared to each other, but relate solely to:
- Risks to security (see 6.4 below)

- Impacts on the disabled (Blue Badge)
 - Impacts on residents who live within the restricted streets
 - Impacts on businesses (or deliveries) to restricted streets
- 6.3 Reputational risk – The NaCTSO report of 2016 makes recommendations to the Council to increase security within its most crowded streets. This has subsequently been followed up by correspondence from the Chief Constable of Avon and Somerset Police recommending that an ATTRO be implemented in respect of the roads which are identified as high footfall/crowd density areas within the inner core of Bath City Centre.
- 6.4 The Risk Assessment takes a whole system approach to the city centre security into consideration, including:
- (1) Vehicle as a Weapon (VAW) Vehicle as a Weapon (VAW)
 - a) Deliberately driving a vehicle: at an individual or into crowds of people to cause harm; or deliberately driving a vehicle into infrastructure to damage or disrupt its operation. This may indirectly lead to harm to people or disruption to the operation of a site/event, or more widely, critical services or supplies. Driving a vehicle into crowds is regarded by terrorists as attractive because it is likely to cause multiple casualties, is low complexity, affordable, requires little planning and skill and is perceived as less likely to be detected in the planning phase. VAW attacks are frequently the first part of a *Layered Attack*. The attacks frequently begin on public roads with little or no warning and are often followed by a marauding attack using bladed weapons, firearms or fire as a weapon.
 - (2) Vehicle Borne Improvised Explosive Device (VBIED)
 - a) An improvised explosive device is either visible or concealed within a vehicle and transported to target. The effects from a VBIED detonation include the blast, fireball, primary & secondary fragmentation and ground shock. The blast stand-off (the distance between the device and the asset) is the most important factor in determining the extent of damage that can be caused. Maximising the blast stand-off distance will reduce the damage sustained to the asset
 - (3) Layered Attack – Vehicle Transporting Attackers and/or Weapons
 - a) A layered attack is a combination of attack types. The vehicle may facilitate the delivery of armed attackers, either covertly or overtly; or be combined with VBIED or VAW attack

7 EQUALITIES

- 7.1 An Equality Impact Assessment Statement was published with the Consultation. An Accessibility Study has been carried out by an independent consultant who is a member of the National Register of Access Consultants (NRAC) has now been completed and has been used to inform an Equality Impact Assessment, which is included in Appendix 8 (an Easy Read version is also available).

7.2 The Accessibility Study (included as Appendix 9) was a wide-ranging study into the impacts not only of the City Centre scheme, but also the Council's proposals for the Milsom Street bus gate and Kingsmead Square public realm improvements.

7.3 The Accessibility Study considers the impacts of the above schemes on various types of disability including the mobility impaired together with those people with visual, neurological, auditory and metabolic disabilities.

7.4 The NRAC Consultant has also undertaken a series of interviews (accompanied by the Council's Equalities Officer) with individuals who had responded to the Council's City Centre Security public consultation. These interviews include testimony from individuals/ representatives of various types of disabled organisations regarding the proposals.

7.5 The main recommendations arising from the Accessibility Study include:

- (1) Vehicular access to be provided for Blue Badge holders at all times into the restricted streets
- (2) A requirement for the administrative burden relating to access requests into the restricted streets to be borne as far as possible by the Council.
- (3) The Accessibility Study recommended specific to ATTRO proposal mitigations including:
 - a) Provision of more on-street disabled bays in streets adjacent to and nearby to the restricted streets
 - b) Provision of more loading/unloading bays in streets adjacent to and nearby to the restricted streets

These will be considered as emerging capital items in the Council's budget setting process for 2022/23 and will include assessment of prioritisation in other programmes including highway maintenance and transport improvement programmes.

7.6 Other access improvements recommended by the include

- a) Provision of more off-street disabled bays in the Council's car parks with recommendation that these are free to blue badge holders (with time limits)
- b) Provision of a ramp at Kingsmead Square car park which is compliant with the requirements of the Disability Discrimination Act 1995
- c) Potential for the provision of electric shuttle bus which would be free to blue badge holders and the elderly
- d) Shopmobility to be re-established, but at an improved location
- e) More seating to be provided
- f) Improvements to way-finding facilities
- g) Improvements to surfaces and street lighting

- h) Dedicated pedestrian areas and segregated paths for cyclists and e scooters
- i) Improvements to the Council's public toilets, with more information on the location and accessibility of toilets in cafes and shops

These will be considered as emerging capital items in the Council's budget setting process and includes assessment of prioritisation in other programmes including Highway Maintenance and Transport Improvement Programmes.

8 CLIMATE CHANGE

8.1 The City Centre Security Scheme would likely assist in achieving carbon neutrality by 2030 for the following reasons:

- (1) Reduction in general car parking within the restricted streets may encourage visitors to use more sustainable forms of accessing the City Centre, such as by public transport, walking or cycling
- (2) The changes required for deliveries may encourage businesses to consider more sustainable forms of deliveries, eg 'Last Mile Delivery', Cargo Bike Deliveries, etc

9 OTHER OPTIONS CONSIDERED

9.1 Option 1 - No Modifications to ATTRO or TRO – Mitigations Only

- (1) Security risk: Security risk remains low, as most mitigations lie outside the restricted streets.
- (2) Accessibility: Impact on blue badge: Despite the significant mitigations including additional Blue Badge parking, Kingsmead Square car ramp and a pedestrian crossing at Westgate Buildings, this option still has a significant impact on Blue Badge Holders as it does not provide for any vehicular access by Blue Badge Holders into the restricted streets.
- (3) This option was considered unacceptable as it was not proportionate to risk, in accordance with the Chief Constable's recommendation that the risk was proportionate to threat when the streets are crowded.

9.2 Option 2: Modify ATTRO to "10.30am to 6.00pm". Modify TRO to permit Blue Badge access.

- (1) Option 2 – Assessment of commencing the ATTRO at 10.30am
- (2) Pre "Covid-19" footfall records provided by the Bath Business Improvement District (BID) for the restricted streets show that the commencement of the ATTRO could potentially be delayed by half an hour to commence at 10.30am instead of 10.00am.
- (3) A start time of 10.30am for the vehicle restrictions would also align with similar provisions at York and Chester city centres.

- (4) The option of commencing the ATTRO at 10.30am instead of 10.00am would potentially provide greater opportunity for Blue Badge holders to access services and amenities within the restricted streets prior to the commencement of the ATTRO. However, this would be dependent on a modification being made to the TRO to enable Blue Badge Holders to access the restricted streets during non-ATTRO hours.
- (5) The security risk is considered to be low, although it should be noted that this is based on there being no parked vehicles in the restricted streets after 10.30am.
- (6) However, a significant benefit of the 10.30am ATTRO start would be the opportunity to provide access to Blue Badge holders, and therefore this would depend on exemptions being provided to the TRO to give night-time access to Blue Badge holders, or no TRO being put in place.
- (7) This option was considered unacceptable as it was not proportionate to risk, in accordance with the Chief Constable's recommendation that the risk was proportionate to threat when the streets are crowded.

9.3 Option 3: Modify ATTRO to "10.30am to 6.00pm". No TRO – streets open 6.00pm to 10.30am.

- (1) This option proposes to commence the ATTRO at 10.30am. This will provide additional time for Blue Badge holders to access shops and services from when the shops open to 10.30am.
- (2) As the ATTRO is proposed to be maintained in place between 10.30am and 6.00pm, this option includes for a substantial series of mitigations to reduce its impact, particularly Blue Badge holders.
 - a) This option was considered unacceptable as restricting blue badge holder to before 10.30 am and after 6 pm would prevent some disabled people from accessing shops and services for most of the day. In addition, many shops/services would still be inaccessible to blue badge holders even if additional disabled access bays are created on adjacent streets.

10 CONSULTATION

- 10.1 The Consultation feedback report in Appendix 10 provides further details of how public consultation was undertaken and a verbatim record of all comments received during the consultation. This includes responses submitted through an online questionnaire and those submitted by email or letter. The headline information is provided here.
- 10.2 The public consultation ran from 16 November 2020 – 31 January 2021 with 522 responses received. Much of this feedback received focused on the concerns the proposals would have on people's lives, especially accessibility, particularly in relation to people with mobility impairments; the ability to receive deliveries within the proposed restricted zone; the impact on city centre businesses and residents and the justification for the proposed security measures.
- 10.3 The Council appointed a Nationally Registered Accessibility Consultant to review the consultation responses, and also conducted online and

telephone interviews with 12 people. Some of those who were interviewed were disabled people who had taken part in the consultation, and others were from local disability organisations (including Access B&NES and RNIB). Interviewees were selected to ensure people with a wide range of lived experience of disability were included, including people with mobility impairment, sensory impairment and learning disability. A carer was also interviewed. Interviewees included people who lived inside the proposed security zone, as well as disabled people who travel into the city for different reasons (e.g. to access services or for employment).

- 10.4 In addition to this the Council sought specific feedback on the consultation feedback report and accessibility study from 19 May to 1 June 2021, for Cabinet to review ahead of their final decision. The feedback can be found in Appendix 11.
- 10.5 Consultation has also been carried out with the Council's senior responsible officers, including the Chief Executive, S151 and Monitoring Officers, the Chief Operating Officer, Director of Place Management, as well as the Leader, Deputy Leader and Cabinet Member for Economic Development & Resources, the Cabinet Member for Transport and the Ward Councillors for Kingsmead
- 10.6 There is a further statutory requirement to consult on any TRO. The Council must publish a notice in a local newspaper and will display notices in the relevant area. The relevant documents will be available for inspection from the date that the notice of proposal is first published until six weeks after the proposed Order has been made. Anyone may object in writing to an order within 21 days of the notice being published. Any objection must be considered and a response in writing provided the reasons for decision taken. If the TRO is made a further notice must be published in a local newspaper.

Contact person	Lynda Deane – 01225 396428
Background papers	<i>Contest Strategy 2018</i>
Please contact the report author if you need to access this report in an alternative format	

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By virtue of paragraph(s) 7 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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Access to Information Arrangements

Exclusion of access by the public to Council meetings

Information Compliance Ref: LGA 839/21

Meeting / Decision: Cabinet

Date: 20th July 2021

Author: Lynda Deane

Report Title: Bath City Centre Security

Exempt Appendix 1 – NaCTSO Report

Appendix 2 – Correspondence from Chief Constable – Avon & Somerset Police – February 2019

Appendix 3 – Proposed Bath City Centre Security Map

Appendix 4 – Correspondence from Chief Constable – Avon & Somerset Police – May 2021

Appendix 5 - Proposed HVM for Protective Measures

Appendix 6 – City Centre Legal Advice

Appendix 7a to 7h– Risk and Impact Assessments

Appendix 8 – Equality Impact Assessment

Appendix 9 – Accessibility Study

Appendix 10 – Consultation Report

Appendix 11 – Additional Feedback Report from 19 May to 1 June 2021

The Report contains exempt information, according to the categories set out in the Local Government Act 1972 (amended Schedule 12A). The relevant exemption is set out below.

Stating the exemption:

7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

The public interest test has been applied, and it is concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. It is therefore recommended that the Exempt Appendix be withheld from publication on the Council website. The paragraphs below set out the relevant public interest issues in this case.

PUBLIC INTEREST TEST

If the Cabinet wishes to consider a matter with press and public excluded, they must be satisfied on two matters.

Firstly, they must be satisfied that the information likely to be disclosed falls within one of the accepted categories of exempt information under the Local Government Act 1972.

The officer responsible for this item believes that this information falls within the following exemptions and this has been confirmed by the Council's Information Compliance Manager.

The following exemptions are engaged in respect to this report:

7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Secondly, it is necessary to weigh up the arguments for and against disclosure on public interest grounds. It is considered that there is a public interest in information relating to the City Centre Security being disclosed into the public domain. Other factors in favour of disclosure include:

- furthering public understanding of the issues involved;
- furthering public participation in the public debate of issues, in that disclosure would allow a more informed debate;
- promoting accountability and transparency by the Council for the decisions it takes;

Weighed against this is the fact that the exempt appendix contains detailed information which if disclosed into the public domain would prejudice the prevention or detection of crime and the ability to safeguard national security. It is considered that the disclosure of this information would undermine the ability to properly police on a day to day basis and would undermine both national security and the prevention of crime. The Council must ensure that information which would extend any risk to the security of the City Centre and jeopardise public safety is not disclosed into the wider public domain.

It would not be in the public interest if advisors and officers could not express in confidence opinions which are in good faith and on the basis of the best information available. It is important for public authorities to have some measure of 'private thinking space', and that they are able to share important information with Elected Members tasked with representing the local community.

It is considered that the public interest is best served in this matter by not releasing this information at this time and that a significant amount of information regarding the matter has been made available on these issues – by way of the main report. Therefore it is recommended that exemption 7 applies. The Council considers that the public interest is in favour of not

holding this matter in open session at this time and that any reporting on the meeting is prevented in accordance with Section 100A(5A).

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Chief Constable Andy Marsh QPM

Avon and Somerset Constabulary, Police and Fire HQ,
PO Box 37, Valley Road, Portishead, Bristol BS20 8QJ
Telephone: 01278 646321 Facsimile: 01278 646216

PRIVATE AND CONFIDENTIAL

Mr Will Godfrey & Councillor Dine Romero
Chief Executive & Leader
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

Our ref: AM/JJT

Your Ref:

Date: 21st February 2020

Dear Will and Dine

I write to recommend that Bath and North East Somerset Council introduce an Anti-Terrorism Traffic Order ("ATTRO") in respect of all roads within the area defined within the map attached as 'Appendix A'.

You will be aware that since 2016 Counter Terrorism Security Advisors have been engaged with Bath and North East Somerset Council over discussions around the protection of the city centre from terrorist incidents and the following meetings whereby we advised of our recommendations.

Considerable thought and detail has been considered in relation to the recommendations and has been widely circulated with the local authority during the meetings. The consensus between Bath and North East Somerset Council and ourselves was that recommendations should be submitted to you.

The ATTRO is recommended in order to enable the Chief Constable of Avon and Somerset Constabulary to restrict or regulate the movement of pedestrians and vehicles for the purpose of avoiding or reducing, or reducing the likelihood of, danger connected with terrorism to persons or property on or near a road; and or preventing or reducing damage connected with terrorism (as defined by section 1 Terrorism Act 2000). This would be one of a package of measures designed to improve overall public safety, specifically the security of people in crowded places and protect/prevent damage to buildings from a terrorist attack.

There is an acknowledged threat to the United Kingdom from international terrorism and past experience has demonstrated that this particular threat is acute in intensely crowded places. The City of Bath is a UNESCO World Heritage site and major tourist destination, it has also been identified as a significant crowded place. It is home to Bath Abbey, the Roman Baths, Southgate Centre and the Rec (home of Bath Rugby) amongst many other culturally and natural significant sites. It is also known for events such as the Christmas Market, Bath Half Marathon and Remembrance Sunday parades as well as being home to two Universities.

Bath plays a significant role in the regional economy and the value of the visitor economy in BANES cannot be ignored. The RAND Corporation published a report stating that the five terror attacks that took place in the United Kingdom in 2017 – at Westminster, Manchester, London Bridge, Finsbury Park and Parson Green – potentially led to a loss in economic output of £3.5 billion. The closure of Borough Market and 'denial of access caused by extensive cordons' following the London Bridge attack was estimated to cost £1.4 million. This was mainly borne by smaller and medium sized businesses. The local economy took 6-9 months to return to the level it had been prior to the attack.

I consider that the above circumstances meet both the criteria under section 22C (1) and (2) of the Road Traffic Regulation ACT 1984.

The latest amendment to the Road Traffic Regulation ACT 1984 (enacted by the Counter-Terrorism and Border Security ACT 2019) waives the requirement to publicise an ATTRO in advance, where

in the opinion of the Chief Police Officer, such publicity would undermine the purpose of the order. It is agreed by Avon and Somerset Constabulary and Bath and North East Somerset Council that, in the interests of transparency and accountability there will be no intention to waive the requirement to publicise the ATTRO.

An ATTRO enables traffic which includes vehicle and/or pedestrians to be regulated (the extreme of which would be to restrict access of a road) for preventative purposes in connection with Counter Terrorism. An order will supplement physical security measures in order to preclude vehicles and/or pedestrians from entering or proceeding along a road within the designated area. The ATTRO can only be progressed by way of a recommendation from ourselves the police.

The ATTRO which I am recommending would be permanent but of a contingency nature, which would enable an officer of Avon and Somerset Constabulary to direct that a provision of the ATTRO restricting or regulating pedestrian or vehicular traffic on a particular road should be commenced, suspended or revived. Avon and Somerset Constabulary would make this direction to the extent they considered necessary, informed by security assessment or intelligence of a terrorist threat. If an emergency resulted in the use of the ATTRO this would be authorised by an officer of at least the rank of Inspector and for pre-planned events it would be the Superintendent of Operations.

I will further recommend that wherever possible, at least 7 days' notice of restrictions associated with emergency operation of the ATTRO will be provided to the local authority in order that such notice may also be provided to those persons likely to be affected by the restrictions. Finally, it is also recommended that any emergency restriction put in place in accordance with the ATTRO will not exceed a period of 48 hours without prior approval from the Chief Officer of Police.

A jointly agreed schedule (from the police and local authority) will also be attached to the ATTRO detailing the specific working/operational arrangements for the implementation of the ATTRO between the police and the local authorities when it arises in both pre-planned and emergency arrangements.

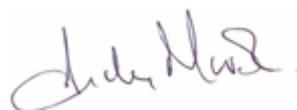
These recommendations ensure that the ATTRO is a proportionate measure used to the minimum extent necessary in an emergency in order to deal with the likelihood of danger connected with terrorism, and which also safeguards the areas identified as being vulnerable. The ATTRO provision will be reviewed annually by Avon and Somerset Constabulary to assess the proportionate use of the power and if it is still necessary.

As mentioned, the ATTRO would be one of a package of measures designed to improve overall public safety and as such we ask Bath and North East Somerset Council to look at ways to further strengthen their protection in areas of high footfall/crowd density.

May I take this opportunity to thank Bath and North East Somerset Council for its consideration of this ATTRO recommendation, which it is believed will provide us with a further protective measure to keep the city safe from a terrorist threat.

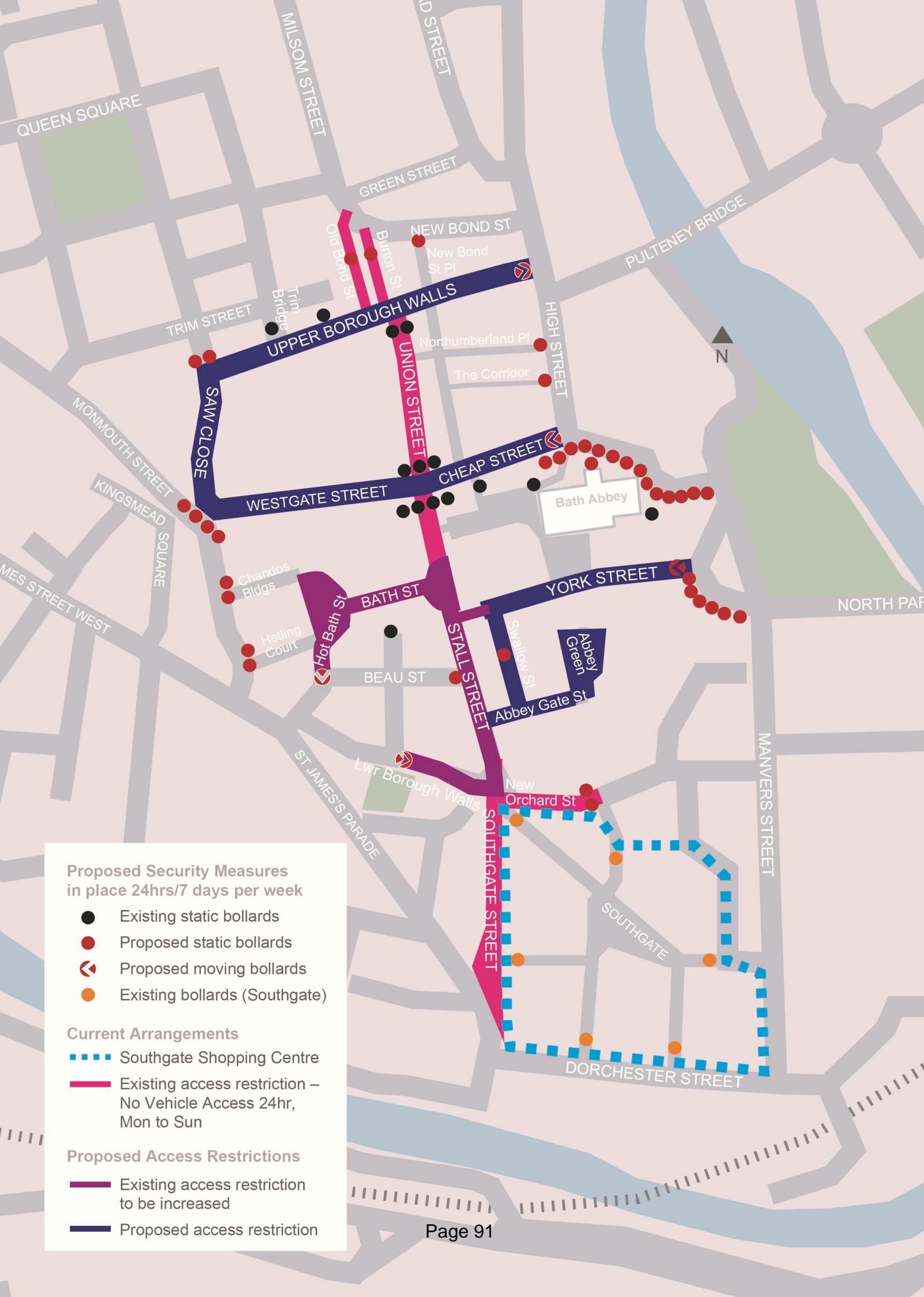
I wait to hear further from you in due course.

Yours sincerely,



Andy Marsh QPM
Chief Constable
Avon and Somerset Constabulary

Avon and Somerset Constabulary Privacy Notice, which relates to the use of personal information, can be viewed via the force website <https://www.avonandsomerset.police.uk/privacy>



**Proposed Security Measures
in place 24hrs/7 days per week**

- Existing static bollards
- Proposed static bollards
- ◀ Proposed moving bollards
- Existing bollards (Southgate)

Current Arrangements

- ▬ Southgate Shopping Centre
- ▬ Existing access restriction –
No Vehicle Access 24hr,
Mon to Sun

Proposed Access Restrictions

- ▬ Existing access restriction
to be increased
- ▬ Proposed access restriction

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Chief Constable Andy Marsh QPM
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PRIVATE AND CONFIDENTIAL

Mr Will Godfrey
Chief Executive
Bath and North East Somerset Council
Email only

Our ref: AM/JR

Your Ref:

Date: 25th May 2021

Dear Will

Further to your letter of 6th May 2021, I understand Counter Terrorism Security Advisors have continued their engagement with colleagues at Bath and North East Somerset Council to discuss the responsibilities around implementation of a proportionate scheme which also takes account of the duties under the Equalities Act 2010.

The Counter Terrorism Security Advisors agree the proposed controlled restricted access of vehicles into the designated area helps balance the needs of the community and businesses with the security requirements and as such would support the implementation of Option 4 as a proportionate solution.

This option will rely heavily on effective control of any access into the designated area and the associated arrangements to maintain security and limit the relative residual risk. As such it will be important for the council to ensure that all the necessary mitigation protocols are in place.

Yours sincerely,

Andy Marsh QPM
Chief Constable
Avon and Somerset Constabulary

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Bath City Centre Security – Proposed HVM for Protective Measures

Sliding Bollards



Static Bollards



Model shown is the Marshall's Rhinoguard with crash rating of [7.5T@40mph](#)

273mm diameter

Height above ground – 1100mm

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City Centre ATTRO/TRO

The Law for Traffic Regulation Order:

1. The powers provided to Councils to implement an Anti-Terrorism Traffic Regulation Order (ATTRO) and a Traffic Regulation order (TRO) are contained in the Road Traffic Regulation Act 1984 ("the 1984 Act). Specifically, Section 22C (ATTRO) and Section 1 (TRO).
2. For an Order to meet the criteria for an ATTRO it must be made for the following purposes:
for the purpose of avoiding or reducing, or reducing the likelihood of, danger connected with terrorism (for which purpose the reference to persons or other traffic using the road shall be treated as including a reference to persons or property on or near the road); or
for the purpose of preventing or reducing damage connected with terrorism.
3. For an order to meet the criteria for a TRO it must be made for the following purposes:
for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or
for preventing damage to the road or to any building on or near the road, or
for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or
for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
(without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or
for preserving or improving the amenities of the area through which the road runs [or
for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality)].
4. The Council must also consider Section 122 of the 1984 Act which states:
It shall be the duty of local authority upon whom functions are conferred by or under this Act, so to exercise the functions conferred on them by this Act as (so far as practicable having regard to the matters specified in subsection (2) below) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off.
(2) The matters referred to in subsection (1) above as being specified in this subsection are—
(a) the desirability of securing and maintaining reasonable access to premises;
(b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
(c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
(d) any other matters appearing to the local authority to be relevant.

5. The Local Authorities' Traffic Orders (Procedure) Regulations 1996 ("The 1996 Regulations") under Regulation 6 requires the Council to consult, before making an order, such organisations representing persons likely to be affected by the order.
6. An objection to the order can be made during the advertisement period (21 days) prior to make the order final. If such an objection is made and cannot be resolved the Council may be required to hold a public inquiry. Paragraph 9(3)(a) The 1996 Regulations sets out when a public inquiry is mandatory that being:
its effect is to prohibit the loading or unloading of vehicles or vehicles of any class in a road on any day of the week—
at all times;
before 07.00 hours;
between 10.00 and 16.00 hours; or
after 19.00 hours, or
its effect is to prohibit or restrict the passage of public service vehicles along a road.
7. By virtue of Section 35 of the 1984 Act any person can object to the making of a TRO within 6 weeks of the date the order is made, please note that although the ATTRO is made under section 22c this section simply adds anti-terrorism as a purpose for the making of an order under section 1, thus an ATTRO is still a TRO for the purposes of objection.
8. The Council will need to discharge the public sector equality duty under section 149 of the Equality Act 2010 ("the 2010 Act") *before* making any order.
9. There is a range of protected characteristics in the 2010 Act.
10. The Council should consider Section 6 of the Crime and Disorder Act 1998 which imposes a duty to formulate and implement certain types of strategies. If the Councils strategy makes reference to or is relevant to the proposed ATTRO this can be taken into account in deciding whether or not to make the proposed ATTRO.
11. The Council should also consider Section 17(1) of the Crime and Disorder Act 1998 which states:

Duty to consider crime and disorder implications.

(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,

(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and

(b) the misuse of drugs, alcohol and other substances in its area; and

(c) re-offending in its area

12. The final current piece of legislation that should be considered is Section of the Traffic Management Act 2004 (“the 2004 Act”) which states:

16(1) It is the duty of a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives—

(a)securing the expeditious movement of traffic on the authority's road network; and

(b)facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

(2) The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing—

(a)the more efficient use of their road network; or

(b)the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority;

and may involve the exercise of any power to regulate or co-ordinate the uses made of any road (or part of a road) in the road network (whether or not the power was conferred on them in their capacity as a traffic authority).

18(1) The appropriate national authority may publish guidance authorities about the techniques of network management or any other matter relating to the performance of the duties imposed by sections 16 and 17.

(2) In performing those duties an authority shall have regard to any such guidance.

13. Protect Duty Legislation (Martyns’ Law) is not yet on the legislative books but on the presumption it will be this can be considered.

14. I trust this advice note is helpful, but should there be any questions please do not hesitate to contact me.

Annemarie Strong

Solicitor

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Hostile Threat Risk Assessment Form MTFA

PROJECT: CITY CENTRE SECURITY – RISK ASSESSMENT – Marauding Terrorist Firearms Attack

DATE: 8th June 2021

ACTIVITY: ATTRO & TRO WITH HVM - CONSULTATION PROPOSAL

COMPLETED BY: D. Noad

Ref.	Sub-standard design ref and issue	Significant Hazard	Population at Risk	Uncontrolled Risk Classification			Risk Control Measure	Action Needed	Residual Risk Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Consequences	Rating	
Bath City Centre Security Scheme	N/A	Marauding Terrorist Firearms Attack	General public	2	4	5 HIGH	<p>The existing CCTV provision provides for good camera coverage of the 'restricted area' and with the proposal for additional cameras to cover blind spots, this will improve the Local authorities ability to support Police in the response phase of a MTA and in the later investigation.</p> <p>ACT Training has been delivered to most operational staff, but refresher training courses need to be scheduled in.</p> <p>ScaN Training has been delivered to CCTV officers from the CTSA's raising awareness for safety and security.</p> <p>The ACT application is another tool which raises awareness and benefits members of the public caught up in a MTFA incident.</p> <p>This includes the principles Run, Hide, Tell.</p> <p>Good collaborative working between Police and CCTV officers. This includes a Police comms device in the CCTV room which enable's CCTV officers the ability to describe the situation on the ground for Police awareness.</p> <p>Work has started with Landlords (southgate) to coordinate response, share preparation effort and receive warnings of an</p>	<p>Continuous improvements to the CCTV system. Adding new cameras to counter new development and blind spots.</p> <p>Review camera locations to ensure that they are in the best positions</p> <p>Regular review of ACT training/awareness</p> <p>Bi-annually exercise to test the operational procedure.</p> <p>Review process for incidents e.g. unauthorised access to the protected zone.</p> <p>Operational group to meet monthly – To include a Police representative.</p> <p>Formal process for information sharing with the Roman Baths</p> <p>ScaN training for new CCTV</p>	1	2	3 LOW	<p>PROTECT DUTY The Government has published a consultation document on a new Protect duty, aimed at helping to protect public venues and spaces from terrorist attacks.</p> <p>Current National Threat level of Substantial shows terrorist attack is "Likely".</p> <p>Please note</p> <p>The consequences rating is low due to the existing control measures in place.</p> <p>However, due to the fast-moving violent attacks associated with MTFA where assailants are moving through a location aiming to find and kill or injure as many people as possible. Most deaths occur within the first few minutes, before the Police are able to respond.</p> <p>Therefore 1 death, or 100 deaths will have a high severity outcome and is hard to mitigate.</p> <p>Further work areas to consider:</p> <ul style="list-style-type: none"> Develop response plans that define clear roles and responsibilities Train staff and personnel to perform key tasks under pressure Provide signage, accessible hiding places and optimise technical capabilities Test, refine and rehearse your response Make provisions for recovery Using announcements makes a difference. Decide how to use them to alert personnel and public

						<p>attack before it's started.</p> <p>Bath Improvement District radio system which will raise collaborative comms and eyes on the ground.</p> <p>Officers have been historically trained in Griffin, and Argus raising awareness of people acting suspiciously and how to look out for the signs. However, these products have now been replaced by Act and SCAN.</p> <p>Police have deployed Operation Servator which aims to detect, deter, and disrupt crime.</p> <p>Roman Baths have 24/7 security in place, this is linked into the CCTV Control Room.</p> <p>Impacts on Local Authority should there be an incident</p> <p>Loss of reputation - The reputational damage of a security breach is something that will concern all senior management – the loss of trust following a failure to protect staff, clients or even data may prove difficult to recover.</p> <p>Costs - Lost or destroyed assets may need to be replaced quickly and at great cost. This is in addition to any losses that might be incurred through the suspension of normal business.</p> <p>Health and safety - Health and safety at work regulations place a legal responsibility on the owner or occupier of premises to have a 'duty of care' for staff and visitors. In the</p>	<p>officers. Team review 2 years.</p>				
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							event of an incident, any subsequent inquiry or court proceeding will look for evidence that the relevant legislation was followed.					
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Risk Classification

Likelihood: -

- Very likely = 4
- Likely = 3
- Possible = 2
- Unlikely = 1

Consequences: -

- No Security Measures = 4
- Some Security measures = 3
- Existing Security Measures = 2
- All security Measures = 1

Risk Rating = Likelihood + Severity: -

- 7, 8 = High
- 4, 5, 6 = Significant
- 2, 3, = Low

Designer / originator: DN

Date 08/06/21

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Hostile Threat Risk Assessment Form IED

Sheet 1 of 1

PROJECT: CITY CENTRE SECURITY – RISK ASSESSMENT - Improvised Explosive Device (Posted, by person, or dropped off)

DATE: 08th June 2021

ACTIVITY: ATTRO & TRO WITH HVM - CONSULTATION PROPOSAL

COMPLETED BY: D. Noad

Ref.	Sub-standard design ref and issue	Significant Hazard	Population at Risk	Uncontrolled Risk Classification			Risk Control Measure	Action Needed	Residual Risk Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Consequences:	Rating	
Bath City Centre Security Scheme	N/A	Improvised Explosive Device Delivered by: Person Post Dropped off		2	6	3 HIGH	<p>The existing CCTV provision provides for good camera coverage of the 'restricted area' and with the proposal for additional camera's to cover blind spots, this will improve the Local authorities ability to support Police in the response phase of a MTA and in the later investigation.</p> <p>ACT Training has been delivered to most operational staff, but refresher training courses need to be scheduled in.</p> <p>ScaN Training has been delivered to CCTV officers from the CTSA's raising awareness for safety and security.</p> <p>The ACT application is another tool which raises awareness and benefits members of the public caught up in a MTFA incident.</p> <p>This includes the principles Run, Hide, Tell.</p> <p>Good collaborative working between Police and CCTV officers. This includes a Police comms device in the CCTV room which enable's CCTV officers the ability to describe the situation on the ground for Police</p>	<p>Continuous improvements to the CCTV system. Adding new camera's to counter new development and blind spots.</p> <p>Review camera locations to ensure that they are in the best positions</p> <p>Regular review of ACT training/awareness</p> <p>Bi-annually exercise to test the operational procedure.</p> <p>Review process for incidents e.g. unauthorised access to the protected zone.</p> <p>Operational group to meet monthly – To include a Police representative.</p> <p>Formal process for information sharing with the Roman Baths</p>	1	2	3 LOW	<p>PROTECT DUTY The Government has published a consultation document on a new Protect duty, aimed at helping to protect public venues and spaces from terrorist attacks.</p> <p>Current National Threat level of Substantial shows terrorist attack is "Likely".</p> <p>Please note</p> <p>The consequences rating is low due to the existing control measures in place.</p> <p>The effects of a detonated IED can be highly destructive. In addition to the initial blast which can be lethal, debris such as broken glass and metal in the form of secondary fragmentation, can cause further injury at a considerable distance away from the seat of the explosion. The longer term disruption as a result of the blast can last for many further weeks, leading to business continuity, economic damage and infrastructure challenges.</p> <p>Therefore 1 death, or 100 deaths will have a high severity outcome and is hard to immigrate.</p> <p>Further work areas to consider:</p> <ul style="list-style-type: none"> • Develop response plans that define clear roles and responsibilities • Test, refine and rehearse your response

							<p>Health and safety - Health and safety at work regulations place a legal responsibility on the owner or occupier of premises to have a 'duty of care' for staff and visitors. In the event of an incident, any subsequent inquiry or court proceeding will look for evidence that the relevant legislation was followed.</p>					
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<u>Risk Classification</u>	Likelihood:-	Very Likely	=	4	Consequences of:-	No security measures	=	4	Risk Rating = Likelihood + Severity:-	
		Likely	=	3		Some security measures	=	3	7,8	= High
		Possible	=	2		Existing security measures	=	2	4,5,6	= Significant
		Unlikely	=	1		All security measures	=	1	2, 3,	= Low

Designer / originator: DN Date 08/06/21

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Designer Risk Assessment Form CP4

PROJECT: CITY CENTRE SECURITY – RISK ASSESSMENT No. RA14rev.1 – ATTRO, 1000 to 1800 hours incl. Blue Badge Access. No TRO, 1800 to 1000 hours. CHEAP STREET & UPPER BOROUGH WALLS

DATE: 21st June 2021

ACTIVITY: ATTRO WITH HVM including BLUE BADGE HOLDER ACCESS. NO TRO (OPTION 4)

COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population at Risk	Uncontrolled Risk Classification			Risk Control Measure	Action Needed	Residual Risk Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO incl BBH access. No TRO Option 4 RA14	Existng situation, pre-Covid 19 pandemic, roads open. No HVM	Vehicle as a Weapon.	General public	4	6	10 HIGH	<p><u>Option 4 proposal</u></p> <p>- Provide ATTRO (10.00am to 6.00pm) with HVM, but include Blue Badge Holder access No TRO, roads open 6.00pm to 10.00am.</p> <p>Proposed for: Cheap Street Upper Borough Walls</p> <p>The report to the Council from the National Counter Terrorism Security Office (NaCTSO) in 2016, raised the issue of potential terrorist threat to Bath's crowded streets in the vicinity of the Abbey Churchyard. Recommendations for increased security at these locations were advised.</p> <p>The Chief Constable for Avon & Somerset Police recommended an ATTRO for the streets referred to above in a letter to the Council in 2019 in order to protect against the use of a Vehicle as a Weapon.</p>	<p><u>Proposals</u></p> <p>Progress an Anti-Terrorism Traffic Regulation Order with HVM (10.00am to 6.00pm), including Blue Badge Holder access.</p> <p>Restrict parking in Cheap Street, Westgate Street and Upper Borough Walls to Blue Badge holders and loading only.</p> <p>Ensure protocols in place to remove any parked vehicles from restricted streets as soon as possible at 10.00am.</p> <p>Strict protocols governing access.</p>	2	2	4 LOW	<p>PROTECT DUTY would include for consideration of HVM in crowded places</p> <p>Current National Threat level of Substantial shows terrorist attack as "Likely" for existing pre-covid situation.</p> <p>With no ATTRO the Council cannot: (i) follow the recommendation within the NaCTSO report. (ii) potentially not comply with Protect Duty legislation</p> <p>With Cheap Street, Westgate Street and Upper Borough Walls restricted only with an ATTRO with HVM (10.00am to 6.00pm) including access for Blue Badge Holders and no TRO, the risk of a terrorist attack by a Vehicle as a Weapon, will be reduced by only permitting Blue Badge Holders access and parking and loading and unloading.</p> <p>Risk will be dependent on removing vehicles from the restricted streets at the start of the ATTRO at 10.00am.</p> <p>Reputational Risk – It should be recognised that the percentage of respondents to the Consultation that agreed/ strongly agreed to the proposals (46%), was the same as the percentage of respondents who disagreed/ strongly disagreed to the proposals (46%). Therefore there would be potential for reputational damage to the Council if it was not seen to be proceeding with its proposals.</p>

<u>Risk Classification</u>	Likelihood:-	Certain = 6 Very likely = 5 Likely = 4 Possible = 3 Unlikely = 2 Very Unlikely = 1	Severity:-	No security measures = 6 Many vehicles in street 1000 hrs = 5 Few vehicles in street, 1000 hrs = 4 Less than 1 hour to remove vehicles = 3 Secure – Vehicles moved 1000 hrs = 2 Secure ATTRO & TRO in place = 1	Risk Rating = Likelihood + Severity:-	8, 9, 10, 11, 12 = High 5, 6, 7 = Significant 2, 3, 4 = Low
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Designer Risk Assessment Form CP4

PROJECT: CITY CENTRE SECURITY – RISK ASSESSMENT No. RA16 – ATTRO, 1000 to 1800 hours; No TRO, 1800 to 1000 hours. LOWER BOROUGH WALLS, HOT BATH STREET

DATE: 22nd June 2021

ACTIVITY: ATTRO WITH HVM including BLUE BADGE HOLDER ACCESS. NO TRO (OPTION 4)

COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population at Risk	Uncontrolled Risk Classification			Risk Control Measure	Action Needed	Residual Risk Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO No TRO Option 4 RA16	Existng situation, pre-Covid 19 pandemic, roads open. No HVM	Vehicle as a Weapon.	General public	4	6	10 HIGH	<p><u>Option 4 proposal</u></p> <p>- Provide ATTRO (10.00am to 6.00pm) with HVM.</p> <p>No TRO, roads open 6.00pm to 10.00am.</p> <p>Proposed for: Lower Borough Walls Hot Bath Street</p> <p>The report to the Council from the National Counter Terrorism Security Office (NaCTSO) in 2016, raised the issue of potential terrorist threat to Bath's crowded streets in the vicinity of the Abbey Churchyard. Recommendations for increased security at these locations were advised.</p> <p>The Chief Constable for Avon & Somerset Police recommended an ATTRO for the streets referred to above in a letter to the Council in 2019 in order to protect against the use of a Vehicle as a Weapon.</p>	<p><u>Proposals</u></p> <p>Progress an Anti-Terrorism Traffic Regulation Order with HVM (10.00am to 6.00pm).</p> <p>No TRO, 6.00pm to 10.00am.</p> <p>Ensure protocols in place to remove any parked vehicles from Lower Borough Walls, Hot Bath Street, Stall Street etc as soon as possible at 10.00am.</p> <p>Strict protocols governing access.</p>	2	2	4 LOW	<p>PROTECT DUTY would include for consideration of HVM in crowded places</p> <p>Current National Threat level of Substantial shows terrorist attack as "Likely" for existing pre-covid situation.</p> <p>With no ATTRO the Council cannot: (i) follow the recommendation within the NaCTSO report. (ii) potentially not comply with Protect Duty legislation</p> <p>With Lower Borough Walls and Hot Bath Street restricted with an ATTRO the Risk Rating is low during the hours when the streets are crowded. With no TRO (6.00pm to 10.00am), and only Blue Badge Holders able to park, this reduces the risk of vehicles needing to be moved from Hot Bath Street, Lower Borough Walls at the start of the ATTRO at 10.00am.</p> <p>Reputational Risk – It should be recognised that the percentage of respondents to the Consultation that agreed/ strongly agreed to the proposals (46%), was the same as the percentage of respondents who disagreed/ strongly disagreed to the proposals (46%). Therefore there would be potential for reputational damage to the Council if it was not seen to be proceeding with its proposals.</p>

<u>Risk Classification</u>	Likelihood:-	Certain = 6 Very likely = 5 Likely = 4 Possible = 3 Unlikely = 2 Very Unlikely = 1	Severity:-	No security measures = 6 Many vehicles in street 1000 hrs = 5 Few vehicles in street, 1000 hrs = 4 Less than 1 hour to remove vehicles = 3 Secure – Vehicles moved 1000 hrs = 2 Secure ATTRO & TRO in place = 1	Risk Rating = Likelihood + Severity:-	8, 9, 10, 11, 12 = High 5, 6, 7 = Significant 2, 3, 4 = Low
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Designer / originator: SJF Date 22/06/21 CDM – Comments: n/a

Designer Risk Assessment Form CP4

PROJECT: CITY CENTRE SECURITY – RISK ASSESSMENT No. RA15 – ATTRO, 1000 to 1800 hours; TRO 1800 to 2200 hours. No TRO, 2200 to 1000 hours. YORK STREET

DATE: 21st June 2021

ACTIVITY: ATTRO WITH HVM including BLUE BADGE HOLDER ACCESS. NO TRO (OPTION 4)

COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population at Risk	Uncontrolled Risk Classification			Risk Control Measure	Action Needed	Residual Risk Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO No TRO Option 4 RA15	Existng situation, pre-Covid 19 pandemic, roads open. No HVM	Vehicle as a Weapon.	General public	4	6	10 HIGH	<p><u>Option 4 proposal</u></p> <p>- Provide ATTRO (10.00am to 6.00pm) with HVM. Provide TRO (6.00pm to 10.00pm) with HVM. No TRO, roads open 10.00pm to 10.00am.</p> <p>Proposed for: York Street</p> <p>The report to the Council from the National Counter Terrorism Security Office (NaCTSO) in 2016, raised the issue of potential terrorist threat to Bath's crowded streets in the vicinity of the Abbey Churchyard. Recommendations for increased security at these locations were advised.</p> <p>The Chief Constable for Avon & Somerset Police recommended an ATTRO for the streets referred to above in a letter to the Council in 2019 in order to protect against the use of a Vehicle as a Weapon.</p>	<p><u>Proposals</u></p> <p>Progress an Anti-Terrorism Traffic Regulation Order with HVM (10.00am to 6.00pm).</p> <p>Progress a Traffic Regulation Order with no access (6.00pm to 10.00pm)</p> <p>No TRO, 10.00pm to 10.00am, but restrict parking in York street to Blue Badge holders and loading only.</p> <p>Ensure protocols in place to remove any parked vehicles from York Street as soon as possible at 10.00am.</p> <p>Strict protocols governing access.</p>	2	2	4 LOW	<p>PROTECT DUTY would include for consideration of HVM in crowded places</p> <p>Current National Threat level of Substantial shows terrorist attack as "Likely" for existing pre-covid situation.</p> <p>With no ATTRO the Council cannot: (i) follow the recommendation within the NaCTSO report. (ii) potentially not comply with Protect Duty legislation</p> <p>With York Street restricted with an ATTRO with HVM (10.00am to 6.00pm) and a TRO with no access (6.00pm to 10.00pm) the Risk Rating is low during the hours when the streets are crowded. With no TRO (10.00pm to 10.00am), and only Blue Badge Holders able to park, this reduces the risk of vehicles needing to be moved from York Street at the start of the ATTRO at 10.00am.</p> <p>Reputational Risk – It should be recognised that the percentage of respondents to the Consultation that agreed/ strongly agreed to the proposals (46%), was the same as the percentage of respondents who disagreed/ strongly disagreed to the proposals (46%). Therefore there would be potential for reputational damage to the Council if it was not seen to be proceeding with its proposals.</p>

<u>Risk Classification</u>	Likelihood:-	Certain = 6 Very likely = 5 Likely = 4 Possible = 3 Unlikely = 2 Very Unlikely = 1	Severity:-	No security measures = 6 Many vehicles in street 1000 hrs = 5 Few vehicles in street, 1000 hrs = 4 Less than 1 hour to remove vehicles = 3 Secure – Vehicles moved 1000 hrs = 2 Secure ATTRO & TRO in place = 1		Risk Rating = Likelihood + Severity:-	8, 9, 10, 11, 12 = High 5, 6, 7 = Significant 2, 3, 4 = Low
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Designer Risk Assessment Form CP5

Sheet 1 of 1

PROJECT: CITY CENTRE SECURITY – IMPACT ASSESSMENT No. ATTRO & TRO - IA5

DATE: 29th June 2021

ACTIVITY: ANTI-TERRORISM TRAFFIC REGULATION ORDER (ATTRO) WITH MITIGATIONS/ No TRO – IMPACT ON RESIDENTS OF RESTRICTED STREETS

COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population impacted	Uncontrolled Impact Classification			Impact Control Measure	Action Needed	Residual Impact Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO & TRO IA5	ATTRO's (10.00am to 6.00pm) & TRO (6.00pm to 10.00am) proposed for: York Street Cheap Street Upper Borough Walls Lower Borough Walls Hot Bath Street Representations were made by the public in response to the public consultation to state that both the ATTRO and TRO would have a negative impact on the lives of the residents of the restricted streets.	Impact on residents of the restricted streets with regard to residents' not being able: - to access the restricted streets with vehicles - to park within the restricted streets - to receive deliveries - to receive essential services - to have access for tradespeople.	Residents of restricted streets.	4	4	HIGH	<u>Mitigation measures</u> - No TRO - Additional Central Zone residents parking spaces to be provided in the City Centre to replace those lost in restricted streets. - Improvements to administration process for one off access requests.	<u>Proposals</u> No TRO for period 1800 – 1000 hours, therefore access (but not general parking) permitted for: Cheap Street Upper Borough Walls Lower Borough Walls Hot Bath Street - 5 no. replacement Residents parking bays to be provided within the City Centre. Administrative burden reduced for those requiring assistance. 20 day Notice period for "one-off" access request permits to be reduced (2021/22).	2	2	LOW	There are not a significant number of Resident's Parking bays currently within the restricted streets. Therefore the impact on Resident's Parking places is low. Residents with Central Zone parking permits can park during the night-time free in the Council's car parks. Residents can utilise existing Central Zone Residents parking bays in other streets in the city centre. Five replacement Residents parking bays are to be provided within the City Centre. Residents can arrange for large deliveries/house removals during ATTRO hours. Residents can receive deliveries during ATTRO hours with the deliveries being made on foot/ by trolley. Statutory Undertakers' services are available during ATTRO hours. As no TRO residents will be able to load and unload outside of the TRO hours. If tradespeople required a vehicle, access for tradespeople would be managed via a one-off access request as part of the Council's protocols.

Page 115

<u>Impact Classification</u>	Likelihood:-	Certain	=	6	Severity:-	Major disturbance for many residents	=	6	Impact Rating = Likelihood + Severity:-
		Very likely	=	5		Major disturbance for few residents	=	5	
		Likely	=	4		Lost time for many residents	=	4	8, 9, 10, 11, 12
		Possible	=	3		Lost time for few residents	=	3	5, 6, 7
		Unlikely	=	2		Minor inconvenience to residents	=	2	2, 3, 4
		Very Unlikely	=	1		No residents concerns	=	1	

Designer / originator: SJF Date 29/06/21 CDM – Comments: n/a

Designer Risk Assessment Form CP5

PROJECT: CITY CENTRE SECURITY – IMPACT ASSESSMENT No. ATTRO & TRO - IA6 DATE: 30th June 2021

ACTIVITY: ANTI-TERRORISM TRAFFIC REGULATION ORDER (ATTRO) WITH MITIGATIONS/ No TRO – IMPACT ON BUSINESSES/ DELIVERIES COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population impacted	Uncontrolled Impact Classification			Impact Control Measure	Action Needed	Residual Impact Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO & TRO IA6	ATTRO's (10.00am to 6.00pm) & TRO (6.00pm to 10.00am) proposed for: York Street Cheap Street Upper Borough Walls Lower Borough Walls Hot Bath Street Representations were made by the public in response to the public consultation to state that the ATTRO and TRO would have a negative impact on businesses/ deliveries within the restricted streets.	Impact on businesses/ deliveries within the restricted streets with regard to: - no daytime access to the restricted streets with vehicles - load and unload within the restricted streets - to provide and receive deliveries - practicalities concerning deliveries - concern over reduced custom	Businesses/ deliverer's within the restricted streets.	4	4	HIGH	<u>Mitigation measures</u> - Additional loading/ unloading bays to be provided in adjacent streets. - Improvements to administration process for one off access requests. - No TRO, so deliveries can be made outside of TRO hours. - Daytime deliveries can be trolleyed/ carried - Potential for use of "last mile"/ cargo bike deliveries	<u>Proposals</u> Additional loading/ unloading bays to be provided in adjacent streets (2021/22): 2 no. at Westgate Buildings Additional loading at Terrace Walk 0800 – 1000 hours loading at southern (coach) bay at Terrace Walk. No TRO 1800 to 1000 hours for all streets except York Street (No TRO 2200 – 1000 hours) 20 day Notice period for "one-off" access request permits to be reduced (2021/22).	2	2	LOW	Deliveries can be made from outside the restricted streets and carried/ trolleyed into the restricted streets during ATTRO hours. Deliveries for large/ bulky items can be made by vehicle during ATTRO hours via the protocols system. The 20 day Notice period could be reconsidered.

<u>Impact Classification</u>	Likelihood:-	Certain	=	6	Severity:-	Major disturbance for many deliveries	=	6		Impact Rating = Likelihood + Severity:-
		Very likely	=	5		Major disturbance for few deliveries	=	5		
		Likely	=	4		Lost time for many deliveries	=	4		8, 9, 10, 11, 12 = High
		Possible	=	3		Lost time for few businesses	=	3		5, 6, 7 = Significant
		Unlikely	=	2		Minor inconvenience to deliveries	=	2		2, 3, 4 = Low
		Very Unlikely	=	1		No business/ delivery concerns	=	1		

Designer / originator: SJF Date 30/06/21 CDM – Comments: n/a

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Designer Impact Assessment Form CP5

PROJECT: CITY CENTRE SECURITY – IMPACT ASSESSMENT No. ATTRO & TRO - IA4 DATE: 30th June 2021

ACTIVITY: ANTI-TERRORISM TRAFFIC REGULATION ORDER (ATTRO) OPTION 4: WITH MITIGATIONS/ No TRO – IMPACT ON DISABLED COMPLETED BY: S. Froggatt

Ref.	Sub-standard design ref and issue	Significant Hazard	Population Impacted	Uncontrolled Impact Classification			Impact Control Measure	Action Needed	Residual Impact Calculation			Comments
				Likelihood	Severity	Rating			Likelihood	Severity	Rating	
ATTRO & TRO IA4	ATTRO's (10.00am to 6.00pm) & TRO (6.00pm to 10.00am) proposed for: York Street Cheap Street Upper Borough Walls Lower Borough Walls Hot Bath Street Representations were made by the public in response to the public consultation to state that the ATTRO would have a detrimental impact on the ability of disabled blue badge holders to access services and amenities within the restricted streets. The Accessibility Report for City Centre Security/ Milsom Street/ Kingsmead Square drew the same conclusions raising concern over the long-term health deterioration for the disabled.	Impact on blue badge holders, due to lack of access to amenities within the restricted streets. Hazards include: - Additional length of travel. - Additional height to travel. - Method of travel. - adverse impact on health and wellbeing	Blue badge holders	5	5	10 HIGH	<u>Mitigation measures</u> - Access and 3 hour parking for Blue Badge holders during ATTRO hours & no TRO for Cheap Street, Westgate Street, Upper Borough Walls. - Additional disabled parking in nearby/ adjacent streets. - Taxi/ carer access for resident disabled - Additional loading and unloading measures in nearby/ adjacent streets. - Improvements to administration process for one off access requests. - More seating	<u>Proposals</u> 8 no. additional on-street blue badge spaces to replace the 2 BBH bays lost through the City Centre Security proposals. 4 no. additional loading and unloading spaces (Westgate Bldgs and Terrace Walk) Administrative burden reduced for those requiring assistance. More Seating.	2	2	4 LOW	(i) More on-street blue badge (ii) More loading/ unloading in adjacent streets (iii) Administrative burden reduced (iv) 20 Day Notice period reduced (v) More seating

<u>Impact Classification</u>	Likelihood:-	Certain = 6	Very likely = 5	Likely = 4	Possible = 3	Unlikely = 2	Very Unlikely = 1	Severity:-	Access extremely difficult for many = 6	Access extremely difficult for few = 5	Lost time/ difficult access for many = 4	Lost time/ difficult access for few = 3	Minor access inconveniences = 2	No access difficulties = 1	Impact Rating = Likelihood + Severity:-
															8, 9, 10, 11, 12 = High
															5, 6, 7 = Significant
															2, 3, 4 = Low

Designer / originator: SJF Date 27/03/21 CDM – Comments: n/a

Equality Impact Assessment / Equality Analysis

Title of service or policy	City Centre Security Project – Proposed Access Restrictions (interim EIA)
Name of directorate and service	Environmental Services – Highways, Transport and Parking
Name and role of officers completing the EIA	Simon Thomas – Senior Engineer, Design & Projects Group Louise Murphy – Corporate Equalities & Diversity Officer
Date of assessment	29 th June 2021 (and ongoing)

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version (including the action plan section) being published on the Council’s and NHS Bath and North East Somerset’s websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g</p> <ul style="list-style-type: none"> ● How the service/ policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>Since 2017 Bath & North East Somerset Council have been working with the police and stakeholder organisations to improve security to key crowded streets and spaces within the city centre, particularly from hostile vehicle attack.</p> <p>Whilst there is no specific terrorism threat at present, counter terrorism police have advised that improved permanent protection and access restrictions should be a priority. Bath & North East Somerset Council therefore proposes to install purpose-designed controlled access points, replacing temporary measures and providing a higher quality of protection around the Bath Abbey, the Roman Baths and Pump Room, as well as the retail core of the city centre by early 2022.</p> <p>The council aims to ensure security measures combine protection of people, the economy and Bath’s outstanding heritage through robust but sensitive design and management.</p> <p>The project will be delivered through the Council’s Highways department with collaboration with its Emergency Management Team, although there will be frequent liaison with all internal service providers affected.</p>

1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>Whilst there is no legal or national requirement for the provision of access restrictions and associated protection measures in city centres, counter terrorism police representing forces across the UK, are now advising local authorities that improved protection should be introduced. In 2016 Avon and Somerset Police commissioned a survey report, which was carried out by the National Counter Terrorism Security Office (NaCTSO), which identified areas of crowded spaces in key parts of the city centre that are vulnerable to terrorist attack.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The key objective of the project is the protection of key crowded spaces within the central core of the city centre.</p>
<h2>2. Consideration of available data, research and information</h2>		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> ● Demographic data and other statistics, including census findings ● Recent research findings (local and national) ● Results from consultation or engagement you have undertaken ● Service user monitoring data (including ethnicity, gender, disability, religion/belief, sexual orientation and age) ● Information from relevant groups or agencies, for example trade unions and voluntary/community organisations ● Analysis of records of enquiries about your service, or complaints or compliments about them ● Recommendations of external inspections or audit reports 		

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Because of the size of the team it is not appropriate to include specific details of protected characteristics.
2.2	What equalities training have staff received?	All staff receive equalities training as part of the induction programme and some top-up training. CCTV operatives have received bespoke equalities training. Future training should be designed to ensure staff are informed to provide advice on access queries, and also that any checking or vetting of people is carried out in a fair and consistent manner and that this does not vary across groups (due to stereotypes about certain minority ethnic minority groups). Checking should be consistent across all social groups. This will also need to be included within policy and protocols documentation.
2.3	What is the equalities profile of service users?	Residents, visitors, businesses, service providers across all equality groups and protected characteristics.
2.4	What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction surveys, consultation findings). Are there any gaps?	Data collection for footfall has been examined. An assessment for potential blue badge holder displacement was undertaken. In addition, some research was completed on supported housing provision within the protected zone.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	The proposals were shared with the Active Travel and Accessibility Forum and the Independent Equality Advisory Group. A public consultation ran from November 2020 to January 2021 522 responses in total 46% Agree 46% Disagree to principle of proposals 60% disagreed on streets proposed/timing of restrictions Respondents: 86% residents 19% businesses (some overlap) 18% of respondents considered themselves to have a disability

		<p>Responses to the consultation included the following issues:</p> <ul style="list-style-type: none"> • accessibility, particularly in relation to people with mobility impairments • the ability to receive deliveries within the proposed restricted zone • the impact on city centre businesses and residents and • the justification for the proposed security measures. <p>In addition, an Accessibility Study was undertaken by an independent access consultant. This study included meetings with a number of disabled people to find out in detail about the way that the proposals might impact upon them, and also to determine the effectiveness of possible mitigations. The findings of the Accessibility Study are summarised in 3.4.</p> <p>Consultation took place with B&NES internal teams to determine potential effect on Council wide services and operations. This has included the Council's Carer and Mental Health service providers. We have also consulted trusted partners/ key stakeholders and then the wider business and residential community that are likely to be affected. Comments have been captured, collated and compiled within a report to Cabinet in advance of advertising Traffic Regulation Orders.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	When a decision is made, the ATTRO/TRO will then be advertised and subject to additional consultation. Additional issues relating to equality that are raised will be monitored, and potential mitigations will be considered where possible.
<h3>3. Assessment of impact: 'Equality analysis'</h3>		
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. 	

			<ul style="list-style-type: none"> • Could have a negative or adverse impact for any of the equality's groups
		<p>Potential positive impacts of the proposals to increase city centre security</p>	<p>Potential negative impacts and what could be done to alleviate these?</p>
	All groups	<p>The provision of security measures is aimed at lessening the city centre's vulnerability to terrorist threats. The proposals aim to keep residents and visitors safe, to minimise potential casualties/ loss of life and also severe impacts on the economy of Bath and potentially the wider region.</p>	<p>Several options have been explored that aim to balance the need for increased security against ensuring access for disabled people and those who live within the proposed zone.</p>
3.1	<p>Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>No particular positive impacts have been identified on the grounds of sex and gender.</p>	<p>No issues relating to the single characteristic of sex/gender were raised within the consultation process. Within the consultation there were issues raised about safety issues for disabled women.</p> <p>The issue of the safety of women and girls have been brought sharply into focus recently. There are potential implications in relation to perceived safety for women (both disabled and non-disabled) who are likely to feel more vulnerable if they are not able to park/get a taxi/be dropped off close to their destination.</p> <p>Therefore, there are issues to address in relation to</p>

			safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.2	Pregnancy and maternity	<p>As the proposals would result in streets with less vehicles, there are likely to be positive impacts for parents/carers with young children who may be less at risk from passing cars.</p> <p>Streets with less traffic may also be much easier to negotiate to anyone pushing a pram/buggy.</p> <p>The removal of vehicles from the area will have a beneficial impact on air quality. Children who are subject to poor air quality can have whole life impacts and reduction in lung capacity of up to 15%.</p>	<p>There are potential implications in relation to parents/carers with small children if they are no longer able to park/get a taxi/be dropped off as close to their destination within the proposed zone.</p> <p>This could be considered during the implementation stages, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.</p>
3.3	Transgender – – identify the impact/potential impact of the policy on transgender people	No positive impacts were identified in relation to transgender people.	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination.

			There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.4	Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	<p>For some disabled people, restricting traffic to the proposed areas would have a positive impact and make them feel more safe and secure.</p> <p>Streets with less traffic may be easier to negotiate for some disabled people (e.g. those with mobility impairment, wheelchair users, people with learning disabilities).</p> <p>The removal of vehicles from the area will have a beneficial impact on those who have asthma, COPD and similar conditions</p>	<p>Within the consultation, there were a lot of issues raised in relation to disability. In particular:</p> <ul style="list-style-type: none"> • The need for access “at-all-times” for vulnerable groups (particularly Blue Badge Holders). • Access for residents <p>A full Accessibility Study was undertaken to understand the potential impacts and assess potential mitigations. The Access Study made the following recommendations:</p> <ul style="list-style-type: none"> • Allow Blue Badge holders to access the zone at all times – (this recommendation is now being considered, and Cabinet will base their decision on the need to balance access requirements alongside security risks). • Switch administrative burden for access requests to B&NES (incl. deliveries). This would involve the Council working with customers and residents to ensure that access is as easy as possible whilst ensuring that the security objective remains in place. <p>The Accessibility Study also explores a number of possible mitigations:-</p>

			<ul style="list-style-type: none"> • Electric shuttle bus if options to allow Blue Badge Holders access was not possible (In the study, disabled people expressed concerns that a shuttle may be difficult to access for many, and also had concerns about frequency, route, hours of operation etc). • Increase number of on-street disabled parking in adjacent streets (In the study, concerns were expressed about the unmanageable distances this would still involve for those with mobility impairment and also the knock-on negative impacts for residents parking). • Increase number of free off-street disabled parking in Council car parks (this is being explored) • Various other improvements (which are outside of the scope of the work for the City Centre Security Proposals, but might lessen negative impacts for some disabled people - such as improvements to footway surfaces, tactile surfaces, lighting, seating etc, improvements to public toilets). • Concerns around personal safety at night are to be addressed through simple changes to the design of streets such as increased street-lighting and the installation of additional CCTV. Funding for these safety measures will be considered through mechanisms such as the Safer Street Fund, CIL monies or even potential provision through developer contributions.
3.5	Age – identify the impact/potential	For some older people,	Many of the issues outlined in 3.4 also apply to older

	<p>impact of the policy on different age groups</p>	<p>restricting traffic to the proposed areas could have a positive impact and make them feel more safe and secure.</p> <p>This may also be the case for younger age groups, where there may be positive impacts and increased safety with less traffic.</p> <p>The removal of vehicles from the area will have a beneficial impact on air quality. Children who are subject to poor air quality can have whole life impacts and reduction in lung capacity of up to 15%.</p>	<p>people. Within the consultation, there were a lot of issues raised in relation to vulnerable groups, which include older people. In particular:</p> <ul style="list-style-type: none"> • The need for access “at-all-times” for vulnerable groups (particularly Blue Badge Holders). • Access for residents <p>There may be particular issues for older people who use taxis if these were no longer able to access the zone to drop off.</p> <p>It was noted that particular service run by Age UK are located within the proposed zone (St Michaels Day Centre) and service users are dropped off by minibus near to the centre. Many service users have difficulties walking any distance. This will need to be addressed in the implementation phases, whichever option is chosen.</p>
3.6	<p>Race – identify the impact/potential impact on different black and minority ethnic groups</p>	<p>No positive impacts identified</p>	<p>No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination.</p> <p>There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and</p>

			street lighting.
3.6	Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	No positive impacts identified	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination. There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.7	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	No positive impacts identified.	Further decisions to be made surrounding vehicular access requirements for weddings at the Abbey.
3.8	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	No positive impacts identified	Further decisions to be made surrounding vehicular access requirements for funerals at the Abbey.
3.9	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	No positive impacts identified.	There are cost implications for some people if there is less available on-street parking (for Blue Badge Holders and non-Blue Badge Holders). On-street parking provision is being considered alongside this proposal.
3.10	Rural communities* – identify the impact / potential impact on people living in rural communities	No positive impacts identified	No issues identified

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
NB – As a decision has not been made about which particular option will be progressed, it is not possible to develop a clear action plan at present. Potential issues that will need to be worked on when a decision is made have been listed below. Further details will be added as the pathway becomes clear.				
Training for CCTV staff				
Safety issues - Explore CCTV coverage and lighting				
Access for Age UK service users to St Michael's Day Centre				
Explore and increase parking provision for Blue Badge Holders adjacent to the zone				
Explore further improvements to the				

public realm (such as improvements to footway surfaces, tactile surfaces, lighting, seating etc)				
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5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Chris Major (Divisional Director or nominated senior officer)
Date: 30/06/21

Louise's notes after meeting Lynda and Simon 4/2/20

Bollard spacing – will be 1.2 metres – louise will check what is recommended for mobility scooters. The current spacing in Union St is 1.2 metres and has received no complaints. Simon has been informed by London Cycle Guides that widest width of bikes is 1.2 metres.

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SNC • LAVALIN

Bath City Centre Accessibility Study Final Report

Bath & North East Somerset Council

18th May 2021

5204216-3-1



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Formats:

We have used minimum 12pt text for the body of the text used within the report when printed at A4 size. Best endeavours have been perused to enable screen reading. Please advise if you have any difficulties accessing this document.

If you require a copy of the findings of this report in an alternative format including easy read, audio, braille, or alternative languages, please contact Equality@bathnes.gov.uk or telephone 01225 39 40 41

Limitation of Scope:

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This document has 60 pages including the cover.

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Contents

Chapter	Page
Preface	5
1. Introduction	6
2. Executive Summary	6
2.1. Addendum to Executive Summary:	7
3. Report Scope	11
3.1. Legislative Context	11
3.2. Limitations of Report	11
4. Methodology	12
4.1. Methodology Outline	12
4.2. Methodology Approach	13
4.3. Methodology Reach	14
4.4. Stage 1 – Initial Evidence Gathering	14
4.5. Stage 2 – Initial Assessment - leading to this Interim Report	15
4.6. Stage 3 – Stakeholder Engagement	15
4.7. Stage 4 – Final Assessment - leading to this Final Report	16
4.8. Programme	16
5. Evidence / Examples	17
5.1. Public Consultation	17
5.2. Stakeholder Engagement	19
5.3. A Stakeholder’s Analysis	27
5.4. Other Stakeholder Evidence	31
5.5. B&NES’s Preliminary Post-Consultation Considerations	31
5.6. Examples from other Cities	34
6. Observations	36
6.1. Persona Narratives	36
6.2. Scenarios	36
6.3. The “Mobility” Narrative	36
6.4. The “Visual” (and “tactile”) Narrative	38
6.5. The “Auditory” (and “alternative communication”) Narrative	39
6.6. The “Neurological” Narrative	40
6.7. The “Metabolic” (aka “convenience”) Narrative	40
6.8. The “Companion” Narrative	41
6.9. The “Resident” Narrative	41
6.10. The “Worker” Narrative	42
6.11. The “Shopper / Service User” Narrative	42
6.12. The “Tourist” Narrative	43

7.	Considerations Regarding Modifications	44
8.	Recommendations	49
8.1.	Risk Perspectives	49
8.2.	The Service Design Paradigm	50
8.3.	Shifting the Administrative Burden	51
8.4.	Accessibility Permits	51
8.5.	Electric Shuttle	53
8.6.	Improvements	54
8.7.	Milsom Street	57
8.8.	Kingsmead Square	57
8.9.	New Bond Street and Seven-Dials Junction	58
8.10.	Management and Communication	59

Figure	Page
Figure 1: Accessibility Study Area	8
Figure 2: Proposed Measures	9

Preface

Following advice obtained from Avon and Somerset Police, Bath & North East Somerset Council are proposing to limit access to the central City Centre area as an anti-terrorism measure. The Council are also intending to limit access to Milsom Street and Kingsmead Square as traffic reduction and urban realm enhancement measures.

This Report identifies the impacts of these proposals (both in terms of benefits and challenges) with regards to accessibility and puts forward recommendations for the Council's consideration in the form of improvements and/or mitigations.

1. Introduction

Following advice obtained from Avon and Somerset Police, Bath & North East Somerset Council are proposing to limit access to the central City Centre area as an anti-terrorism measure (see figure 2). The Council are also intending to limit access to Milsom Street and Kingsmead Square as traffic reduction and urban realm enhancement measures. Initial proposals propose the exclusion of most vehicles, including those used by disabled people or companions of disabled people with support roles, whether with or without Blue Badges.

This report identifies the impacts of these proposals (both in terms of benefits and challenges) with regards to accessibility and puts forward recommendations for the Council's consideration in the form of improvements and/or mitigations.

Between the end of 2020 and the beginning of 2021, the council undertook a public consultation exercise. A significant proportion of the 522 instances of feedback, provided via the online public consultation, pertain to accessibility. Depending on the precise question to which respondents were giving an answer, there was an almost equal split between those for and against making changes in relation to security but around 60% of all respondents were negative with regards to implementation.

Atkins' methodology hinges around the use of representative Persona Narratives and understanding probable impacts for each Personas, reinforced by stakeholder interviews with panellists able to provide insight with regards to:

- 5 areas of need / requirements for which we were seeking feedback and circumscribing a universal "Envelope of Need" including: Mobility, Visual, Auditory, Neurological and Metabolic Needs.
- 4 Scenarios that arise as a result of the context of the proposals. These Scenarios are encapsulated by personas, described as Residents, Workers, Shoppers / Service Users and Tourists.
- In addition, we sought to take account of companions with "support" roles.

Following on from the Public Consultation and Interim report, Atkins assisted B&NES whilst undertaking Stakeholder Engagement via online and phone interviews with a range of people able to share their experiences in relation to each of the above Persona.

2. Executive Summary

Bath City Centre is a very significant *Place*, however, in order to achieve the most desirable outcome, it is firstly most beneficial to look at the City Centre from the perspective of the *Service* it performs and not just the *Place* in of itself. Our overarching recommendation, therefore, is to consider how one approaches the issues that the council are seeking to address within a Service Design paradigm. Therefore, our summary of recommendations, are as follows:

- Whilst it is recognised that vulnerability can come in the form of short and well recognised security related events we also recommend that overall project assessment take into account the "vulnerabilities" experienced by multiple people as a result of the detrimental effect on their wellbeing over time. Exclusion from everyday community life can result in decline in physical and mental health, with the risk of an earlier death (see: [Social Isolation and Health by Julianne Holt-Lunstad](#))

- In the first instance and from an equity perspective therefore, we would be obligated to question reasonableness of excluding vehicles used for the purposes of enabling access. We are of the view, especially following Stakeholder Engagement, that in order to maintain equity of access that the B&NES Council would be best advised, to devise security protocols that enable rather than exclude access for Blue Badge holders if at all possible and, whether by car, by taxi or care organisation.
- Indeed, respondents to Public Consultation and Stakeholder Engagement (who were concerned about the lack of accessibility of the initial proposals) were keen to stress not only the matter of detrimental impacts on wellbeing, but independence and dignity as well. The view expressed was that proposals amounted to exclusion. Key reasons for this view were that:
 - Blue Badges for example are only issued where someone is not able to walk further than 50m. The resulting restrictions would result in people having to travel more than 50m.
 - For some blind people this is further than some can reasonably navigate.
 - For some people with mobility difficulties this is further than they can walk and if they could walk further would involve enduring intolerable pain.
 - Using a car also reduces the likelihood of tripping and falling on Bath’s uneven streets by enabling people to get close to their destination which may not be wheelchair accessible.
- Some might ask “why cannot people use a wheelchair?” The problem here is that many of Bath’s pavements are uneven, too narrow, obstructed by street furniture and there are insufficient dropped kerbs. Moreover, wheelchairs would be of little use for blind and partially sighted people who are able to walk independently. Furthermore, there are significant changes in level across the city if people were to use manual chairs, whilst obtaining and using powered wheelchairs to make such journeys is not as straightforward as people might imagine. For example, it would appear that Shopmobility, whilst in ambience due to COVID-19, is currently located too far from the shops and that take-up in its use may be impacted by the problems posed by the current streetscape.
- Nevertheless, we recognise that security concerns need to be addressed also. Within our Interim Report our first recommendation, was for the B&NES Council to explore a permit-based system. However, much of the Stakeholder feedback identified a number of problems with regards to the workability of permits if a complicated permit system were introduced. We also recommend that an electric shuttle service be explored. Even so, this is not ideal and would pose a number of significant problems for reasons that we will explain in the body of the report. Consequentially:

Stakeholder feedback pertaining to mobility difficulties, blind, partially sighted, dementia and companion perspectives were of the view that exemption should simply be given to Blue Badge holders (whether for a car that the holder drove, a car that others drove, a taxi or care organisation). They felt that the Blue Badge holder scheme and taxi / private hire vehicle licencing system would provide means of assessing risk.

2.1. Addendum to Executive Summary:

- There was consistent feedback that the administrative burden for deliveries should be switched and placed on the team responsible for managing Access and Security,

rather than induce added complications and onerous requirements upon residents seeking permissions, otherwise this will place significant burdens on residents and prove inaccessible for some without every effort made to assist.

- If reliance were to be placed on increasing Blue Badge parking in both Council owned and privately owned car parks (such as at Southgate) then free parking would be necessary and although not solving the problem of distances travelled, routes would need to be significantly improved from car parks, and toilets would need to be made more available and accessible for use.
- We would recommend implementing improvements to address the remaining issues identified during the 2015 access audit (where these fall beyond the current scope), over the short to medium term, as and when opportunities arise.
- Particular concern was expressed during Stakeholder Engagement at:
 - The lack of toilet facilities at Avon Street, used formerly by coach services and car park users.
 - The dangers posed by the steps in the urban realm between the Rail and Bus Stations and the poor visual realm characteristics of the Bus Station.
 - The unevenness of the route to and from Charlotte Street Car Park.
 - An adverse cross-fall to pavement created by the entrance to Manvers Street carpark.
 - The hazards pertaining to the configuration of Seven-Dials Junction,
- Whilst some improvements may take longer to implement than desirable, the accumulative message coming from Stakeholder Engagement, is one of a pressing need to significantly improve the experience of people who face the risk of ever-increasing hurdles to accessing the City and its services, especially if access restrictions, as originally proposed, proceed.
- With regards to Milsom Street and Kingsmead Square our recommendation is to implement a coordinated and consistent approach that works in conjunction with the Security area/zone.
- Whilst New Bond Street and Seven-Dials Junction sit outside the project areas, they sit between the Security area/zone and each of the two other project areas and have significance to how everything works. We recommend attention be given to these spaces as well.

In terms of enabling the delivery of an accessible and inclusive Service driven outcome within the City Centre, we would also recommend:

- Implementing managerial provisions such as enabling access for Blue Badge holders, enabling deliveries, and enforcing cycle and e-scooter use of designated routes only.
- Facilitation of access to toilets.
- Updating and implementing improvements to wayfinding to facilitate navigation.
- Implementing a Service driven inclusive and accessible communication strategy in parallel with the implementation of physical improvements.



Figure 1: Accessibility Study Area – also showing the three project areas within and the relative location of off-street parking

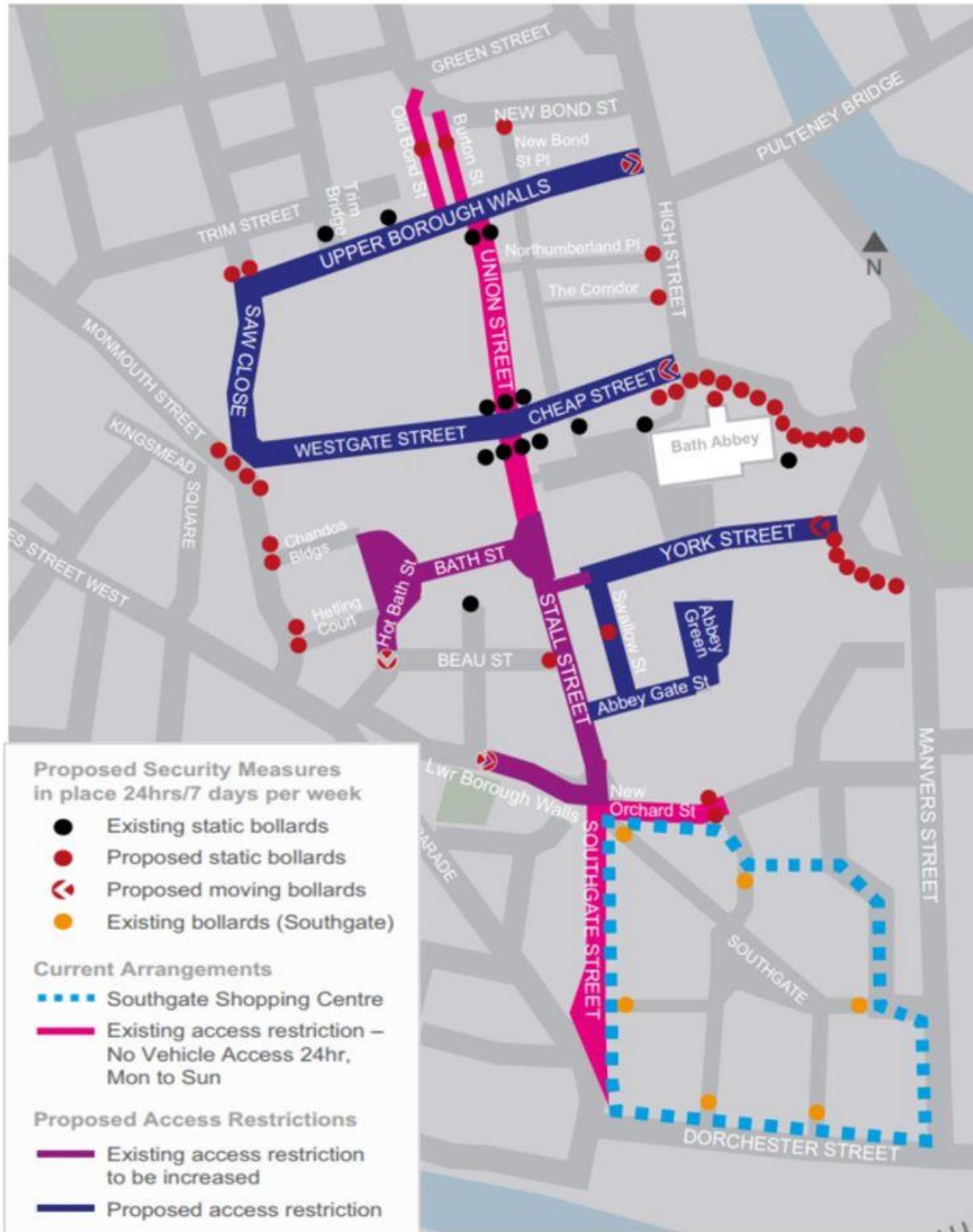


Figure 2: Proposed Measures

3. Report Scope

3.1. Legislative Context

It should be noted that the Equality Act 2010 (EA) (and its predecessor the Disability Discrimination Act (DDA)) are not “design standards”, but civil rights legislation for which it is not possible for us to provide a literal undertaking to provide clients with a “cast iron” technical assessment of “EA compliance”. The legislation on the other hand places legal requirements upon the commissioning organisation’s management and decision-making processes. As such, Atkins’s Access and Inclusive Design Consultancy are working with the B&NES Council officers so that the Council can come to informed decisions. We take British Standards and other such guidance into account to inform our advice, but these do not in themselves denote that the EA has been addressed.

It is the process of public consultation, evidence gathering, accessibility assessment, further stakeholder engagement and the way the accumulated evidence and advice is received and acted upon, that would establish whether the Council have met with their Public Sector Equality Duties (PSED) under the Equality Act.

3.2. Limitations of Report

Whilst Atkins may, in this report, make general observations and suggestions (where applicable) with regards to light quality, the auditory environment, fire, health and safety issues, vertical transport, highways, road safety, active travel and similar subjects; advice provided cannot be deemed to be a report on any one of these related but specialist subjects where Atkins has been appointed to provide advice akin to the discipline of Access Consultancy. Advice will be framed within the current legislative context, but will not be a substitute for other advice, such as legal, employment, fire, nor health and safety advice etc. Further expert advice may be required within these and similarly specialist fields.

Advice will be observational (within the specific time frame of our study) and initial recommendations only will be made. As access and similar consultancy work is advisory and subject to the decision of others, it will not constitute design or specification work, which is the responsibility of others instructed for this purpose. Atkins expects these consultants to diligently refer to our recommendations and to ask questions where necessary.

4. Methodology

4.1. Methodology Outline

The following outlines the methodology taken and steps leading up to this report:

Clarification of Approach:

- Approach: Use Persona Narratives as the basis of probable Persona Journeys and likely impacts
- Reach: Clarifying what is in and outside the scope of the project
- Stages: Identify work stages
- Programme: Outline anticipated programme

Stage 1 – Initial Evidence Gathering

- Gathering desktop material in the form of prior audits, plans, data and existing work that officers have already undertaken to identify opportunities.
- Gathering feedback obtained from Public Consultation that has already commenced and is expected to conclude by the end of January 2021.
- Gather information arising from dialogue with council officers.
- Identify the necessary components of Stakeholder Engagement to collect evidence following an Initial Assessment, whilst also giving sufficient opportunity for stakeholder voices to be heard.

Stage 2 – Initial Assessment - leading to an Interim Report

- Identifying Impacts (pros and cons) - undertaking an initial technical assessment of the likely impacts of the proposals
- Identifying Positive Outcomes and Mitigations – undertaking an assessment highlighting positive outcomes and identifying potential mitigations to counteract identified potential negative impacts.
- Prioritise Mitigations – based on what can be achieved within budget and what ought to reasonably follow.
- Produce an Interim Report – containing preliminary recommendations as the basis for Public Consultation Stakeholder Engagement

Stage 3 - Stakeholder Engagement

- Liaise with B&NES's Equalities Officer in order to design stakeholder engagement suitable to COVID -19 conditions and inclusive engagement.

Stage 4 - Final Assessment – leading to Final Report

- Take account of refined evidence base –following focussed stakeholder engagement.
- Confirm positive outcomes, impacts, reasonable mitigations, and priorities.

- Clearly distinguish short-term measures (to be accommodated with the budget of each project) from medium to longer term measures.
- Make recommendations regarding medium term measures that fall outside immediate budgets.

Programme:

- Consisting of the above four stages with the aim to complete by the end of March 2021.

4.2. Methodology Approach

Whilst the current situation is one of temporary COVID-19 related restriction to access, the starting point against which to assess the proposed permanent restrictions will be the situation prior to the temporary COVID-19 restrictions. Nevertheless, it is considered that the current temporary restrictions provide a measure of evidential insight as to the likely implications of permanent restrictions.

Our methodology employs evidence gathering, assessment of impacts, positive outcomes, mitigations and prioritization, production of an interim report, stakeholder engagement, final assessment, and the production of a final report. It hinges around the use of representative Persona Narratives and Scenarios and understanding probable impacts for Persona Journeys.

By using Persona Narratives together with Scenarios, it was possible to identify the probable impact of the proposed projects upon Persona Journeys. This not only aided analysis, but aided stakeholder engagement, reporting and could aid subsequent communications that B&NES Council undertake.

To generate these Persona Narratives, we will use the “Envelope of Need” approach to circumscribe the 5 universal areas of need that everybody has and the specific requirements that some people have:

1. **Mobility** (including wheelchair users and walking aid users),
2. **Visual** (including blind and partial sighted users with/without guide dogs and/or canes),
3. **Auditory** (including Deaf and hard of hearing users),
4. **Neurological** (including people living with Dementia, on the Autistic Spectrum etc.)
5. **Metabolic** (including users living with dietary and/or toilet related requirements)

We also considered other people’s needs such as:

6. **Companions** with support roles, with relevance to parents of young children and pregnant mothers

However over and above the above needs there are Scenarios.

- A. Residents - those with accessibility requirements who live or have businesses in one or another of the areas affected and have needs of access and deliveries.
- B. Workers - those with accessibility requirements who work in one or another of the areas affected or are visiting on business.

- C. Shoppers / Service Users – those with accessibility requirements who wish to access shops and/or services in one or another of the areas affected.
- D. Tourists – those with accessibility requirements who wish to enjoy the tourism/visitor opportunities.

Scenario “A” includes individuals/families/households who within the context of COVID-19 have had to shield and may be dependent on others coming to them, in addition to them venturing out when not shielding.

4.3. Methodology Reach

There are three related and yet separate subsidiary projects to the Accessibility study (see figure 1):

- City Centre Security Area
- Kingsmead Square
- Milsom Street

Since some of the anticipated physical mitigations may include identifying alternative Blue Badge parking areas in bays or appropriate double or single yellow line parking locations outside the immediate project areas, it is anticipated that the scope of any physical recommendations would fall inside the area encompassed by the River Avon, the A367, Charlotte Street Carpark, Queen Square, George Street and Cattle Market Carpark (see Figure 1). In practice though, recommendations are likely to apply to adjacent streets, those no further than one/two streets away or routes to and from off-street carparks.

4.4. Stage 1 – Initial Evidence Gathering

One of the primary forms of documentary evidence that we have considered are the results of the Access Audit undertaken by CAE (Centre for Accessible Environments) in 2015. In addition, plans of existing road layouts, and temporary road layouts, used for Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs), have provided information on physical context. We have also considered broad land use information for the areas affected by the proposed projects, so that we might better identify where people may be setting out from or seeking to get to. To aid interpretation of the proposals we have viewed the streets via Google Earth and Google Street View.

An important source of information has been feedback obtained from formal public consultation commenced in 2020. We used this as our preliminary source of stakeholder information, to help inform and refine our stakeholder engagement exercise focussed on accessibility related matters.

We have undertaken a dialogue with Council officers responsible for Equalities and Highways Engineering. Furthermore, we have held meetings with the project team for Kingsmead Square and Milson Street and with the project team for the City Centre Security project. In addition to the audit and plan information that was available, it became apparent that council officers have also begun some initial analysis themselves of where accessibility improvements might be carried out owing to the installation of security measures.

As part of gathering evidence, we continued to engage with those responsible for equalities and communications to refine and confirm the necessary components of Stakeholder Engagement. This was in part because of conversations with known groups and bodies. Stakeholder engagement provided us with additional evidence following our Initial Assessment, whilst also giving sufficient opportunity for stakeholder voices to be heard.

4.5. Stage 2 – Initial Assessment - leading to this Interim Report

Whilst gathering evidence, we began to identify the likely impacts of the proposed changes, identify positive outcomes and reasonable mitigations and then outline priorities.

It was anticipated that due to the limited capital budget for the City Centre Security project, any recommendations regarding mitigations would need to be prioritized. The measures of highest priority will be those which are directly related to physical alterations around security interventions, parking changes and routes between anticipated points of arrival and target locations within the areas affected.

Similar prioritization of recommendations was applied to the mitigations directly associated with Kingsmead Square and Milson Street Projects, where they could be seen as more applicable to these project budgets. Nevertheless, it was stressed that there is likely to be a significant number of interdependencies and benefits to be had by mitigations for all three projects, especially where routes from off-street parking are concerned. Feasibility and effectiveness of our recommendations will still need to be sounded out with both project teams and managerial teams.

Where it was apparent that there are legacy access issues that have historically not yet been addressed (such as those identified within the 2015 access audit) and fall within the project areas but cannot be immediately addressed owing to budgetary limits, then it was recommended that these be identified as short to medium term objectives. We also recommended that the council seek opportunities and funding to address these as a rolling programme of improvements outside the immediate scope of the current projects.

Since the current three projects are capital projects, recommendations sought to identify what physical mitigations can be applied. Nevertheless, we understood from initial dialogue that recommendations pertaining to managerial protocols were also sought. These related to protocols pertaining to vehicle access restrictions within the three areas for specific scenarios that would warrant it. We also recommended, subject to assessment of financial sustainability being undertaken by others, options equivalent to local driven electric buggy services. Even so we understood that a conversation would need to be had pertaining to the recent experiences of the Shopmobility service and its viability.

4.6. Stage 3 – Stakeholder Engagement

Preparation for the Stakeholder Engagement focussed on accessibility formed part of the Evidence Gathering process. We prepared appropriate communication material prior to the Stakeholder Engagement, so that the Equalities Officer had material that could be used to set out the objectives and methodology of the Stakeholder Engagement.

As a by-product of the analysis leading up to this report, we prepared an initial Executive Summary. The initial Executive Summary formed the basis of communications at the outset of Stakeholder Engagement. We sought to communicate in clear non-technical language as possible and made communications available for editorial assessment by the Council's communications team.

The Persona Narratives and Scenarios (described within the Methodology section of this Approach description) formed the basis for framing questions with panellists able to provide insight into probable Persona Narratives and Scenarios and the likely implications for Persona Journeys.

Owing to Covid-19 we had to devise remote means of communication with panellists. Each panellist was assigned to Persona Narratives and/or Scenarios, with the aim of informing anticipated Persona Journeys. The reason for this, was that remote communications can

pose a challenge for some potential panellists, if there is more than one person communicating during an online conferencing.

Owing to the potential difference in communication requirements that different panellists had, we organised twin or individual sessions. This was by far the simplest means of undertaking the Stakeholder Engagement and made organising assistance with communication easier. It also enabled panellists to be more open about matters that they might not want to divulge during a more open session.

4.7. Stage 4 – Final Assessment - leading to this Final Report

This final report is an update on the interim report. It takes account of the refined evidence base – following focussed stakeholder engagement and other evidence that has come in from other sources since the interim assessment. Owing to programme mismatches for the Kingsmead Square and Milsom Street projects, in terms of updating the final report in time, then we have advised that these be dealt as tactical and strategic level matters that could be consulted upon following on from this commission.

We have sought to clearly distinguish and identify short-term measures (to be accommodated with the budget of each project) from short to medium term measures. We made recommendations regarding short to medium term measures that fall outside immediate project budgets, whether they be capital works, managerial recommendations, or revenue funded service options that the council need to consider.

4.8. Programme

The programme for this study was based on the work stages described above. Stakeholder Engagement took place at the beginning of March 2021, following issue of the interim report mid-February 2021. This followed the completion of the wider Public Consultation at the end of January 2021. This final report was written to achieve completion for the end of March 2021.

5. Evidence / Examples

5.1. Public Consultation

First impressions from reading through the public consultation feedback, were that:

- A significant proportion of just the first 200 plus instances of feedback, provided via the online public consultation, pertained to concerns about accessibility. There were at that time over 30 respondents that identified as being disabled and then approximately another 40 who referred to concerns with regards the impact of proposals on disabled people.
- Since the initial review of public consultation took place over 500 have now responded 101 expressed the need to provide access for disabled people within the restricted zone. 76 people considered that they are disabled and 46 preferred not to say whether they were or not.
- It is also apparent that those in favour of the proposals produced a petition at “The Grapes” pub with over 140 respondents who are positive about proposals.
- When considering both streams of information, it seemed that opinion is split as to whether this will benefit Bath or not, and that online consultation feedback indicates that approximately 60% were against the proposals as they originally stood.
- On one hand one has respondents from among those in favour expressing such views as (and we quote) “cars suck” and on the other hand others drawing attention to the fact that their cars, and not just wheelchairs, provide them with a means of mobility. In other words, cars and taxis, just like wheelchairs are a mobility aid for some people and in such circumstances people who rely on them would not necessarily take kindly to their mode of mobility being described negatively.

Of those who commented on accessibility, there was a very strong sense that the planned exclusion of blue badge parking and taxis and the consequential increased travel distances are likely to exclude respondents and/or people that they know from the City Centre. This is also touched upon by some of those who are otherwise broadly in favour of the proposals. Some respondents also expressed the view that proposals, as they currently stand, will present significant accessibility problems to those who live within the City Centre security zone.

It is very apparent that for some, people’s cars and or taxis are equivalent to wheelchairs. Indeed, the strength of feeling expressed by respondents indicates that to them, removal of vehicular access to locations within the City Centre, is equivalent to banning people from using wheelchairs. It is anticipated that some may say in response, the proposals are not banning wheelchairs or mobility buggies and why don’t people use wheelchairs instead of vehicles and walking short distances from these vehicles? However, what this doesn’t take account of is what some respondents expressed, and that is:

- There are limitations for some manual wheelchairs in terms of the distances and vertical changes in level that one can reasonable expect someone to travel.
- Some are not able to operate powered chairs or mobility buggies.
- Some can encounter logistical and fatigue related challenges getting chairs and buggies in and out of cars parked further than would be ideal.

Whilst it doesn’t seem to be spelt out by respondents to the public consultation (and perhaps this is because respondents have taken for granted that others might comprehend this), it’s

also apparent that many of those who would use wheelchairs or mobility buggies in some situations, are not necessarily going to be able to access some of the older and historic properties with their wheelchairs. That is why some will elect to walk short distances into these properties when vehicular access enables them to get close enough and where alternative wheelchair or mobility buggy would be of little help. Moreover, short distances reduce the risk of tripping and falling when not using wheelchairs.

It is also apparent that whilst an access audit was carried out in 2015 in relation to the City Centre, it is perceived by some that little in the way of accessibility within the City Centre has improved. This situation may have inadvertently built up a sense of resentment and increased concern with regards to current proposals. Whilst carrying out an audit was a good thing and although some improvements are reported as having already taken place, if people do not see much change because of an audit there is a danger that people can become cynical.

Some respondents inferred, in one form or another, that accessibility seemed to them to not be sufficiently high up the agenda, especially as it seemed that security now seemed to be taking priority. Some struggled to understand the validity of the security threat and questioned whether proposals would be sufficiently effective when it comes to countering the alternatives to vehicular based terrorist attack.

Whilst these views could be based on limited knowledge of the security threats it is, in part, expressed from a perspective that the proposals themselves pose a threat. One could express this perspective in the following way:

- Whilst there is a perceived form of vulnerability in the form of a physical threat that may occur at a point in the future to people yet unknown there is another form of “vulnerability” that affects people that are known. Consequentially, several respondents inferred that one form of vulnerability was taking priority over another form of “vulnerability.”
- This latter form of vulnerability was expressed as a threat to people’s wellbeing as a result of being excluded and the risk of isolation.
- If not sufficiently addressed, this “vulnerability” would have a long-lasting and known effect, lasting years or lead to early deterioration in both psychological and physical health. For example:
 - One respondent, who is currently shielding, explained the negative psychological implications of not being able to access the City Centre following COVID-19 having already had to live in relative isolation for so long.

It would also be pertinent to highlight that distance from potential points of arrival to destinations would result in some of the respondents having to endure pain for longer and at higher levels, such that attempting some journeys would place some respondents beyond their ability to endure such pain. This would result in a much higher probability of not being able to access parts of the City Centre as a result. Respondents also highlighted the importance of maintaining independence and dignity.

5.2. Stakeholder Engagement

The following are a collation of notes taken during stakeholder engagement and attributed to topic headings:

In General:

- *Overall, are these proposals preventing someone with a mobility problem from going into the City Centre? It could be discriminatory to prevent disabled people from accessing parts of the city.*
- *Maintain access to these roads for Blue Badge Holders.*
- *Anti – terrorism measures might be important/good but not good for people if there is no dispensation.*
- *Disabled people and older people spend a lot of money in Bath. Much more than the young people who come into town having gotten tanked up before they arrive in town. Bath shops and restaurants need the spending power of older and disabled people. If the Council stops Blue Badge Holders parking/entering these roads Bath businesses will lose a lot of money.*
- *Also equates to exclusion from economy.*

About Strategy:

- *Perception of piecemeal approach. It seems like this is just tinkering with traffic management without any overall plans for the City Centre - what is the vision for what kind of City Centre we want? Needs to be a joined-up proposal.*
- *It seems they haven't thought about people living in the City Centre. The government are encouraging people to live in the City Centre – so how does this fit with that? Could this study inform a Liveable Neighbourhoods approach?*
- *This should be a joint consultation between B&NES Council, the Police and Crime Commissioner and WECA.*
- *The Public Realm Movement Strategy was useful, but seems as though it has been put on a shelf?*
- *It feels like the police/security proposals are being used to fulfil an ambition to close the City Centre to cars without public realm improvements/budget.*
- *Need to consider how all these proposals are coming on top of previous changes – more on top of more.*
- *Concerned that it will be much more difficult when hotels and shops fully reopen.*
- *Bath has a lot of older residents. As the population ages, it's a problem shutting down the City Centre without making access arrangements.*
- *We could promote Bath as a city that takes care of people in old age – a spa city, a City of Health, with good public toilets, safe pavements. A City of Health is more than plunging into a spa pool!*

Hours of Use:

- *Why is it a 24/7 closure rather than particular times of day? Why is this a 24/7 proposal? There is not a high footfall in the evenings. 24-hour measures are*

completely over the top. It will stop disabled people and older people visiting cinemas, theatre, bars, restaurants.

- *The 24-hour proposal needs to be delayed. We need to look again at the footfall when everything opens again, and then reassess.*
- *Why not open area up to traffic when the footfall is less?*

About Understanding:

- *The purpose of a Blue Badge is that “it allows 2.5 million people to maintain their independence”. The proposals do NOT promote independent living. These proposals remove independence from disabled people.*
- *One needs to role play 6 months in the life of a city dweller to get an idea of all the examples of challenges they would face.*
- *With these proposed counter terrorism measures, disabled people will have to sacrifice their independence to keep everyone safe.*
- *When City Centre was going into Covid-19 measures, the response was that it could be over-run by Blue Badge Holders. Were any numbers of Blue Badge Holders in the zone at any one time counted? We need to look at the actual numbers, rather than saying there would be too many.*

Practicalities:

- *The City Centre is on a hill.*
- *Concerned about access – how close can you get if you are a Blue Badge Holders, or a taxi – how are disabled people going to get in and out.*
- *Blind people don't drive vehicles. I would like to see short term parking for a driver to be able to park up and assist the person to where they need to get to.*
- *As a blind person, it would be very difficult if you were to get a taxi into Bath and the taxi driver couldn't then take you to where I wanted to go.*
- *The further I have to walk, the more stressful it is. When I am in a large space, there is no “shoreline” for my long cane. Disorientation is much greater without physical detectable features. Crowds meander all over the place now traffic isn't coming through. Where there is shared space, sometimes a vehicle will stop, sometimes not.*
- *I only have to walk a short distance from the bus to where I work. I can get quite tired, so I need to walk at a steady pace. If the streets were quieter with less cars around that would be good for me.*
- *Toilets are really important; some people cannot go out if they don't have access to an accessible toilet during their visit to Bath.*
- *There needs to be multiple drop off points for people bringing disabled people/older people in. Every extra metre of walking counts.*

Implications of proposals:

- *It feels as if we've had the restrictions of Covid-19, and lockdowns, and now we have this restriction too.*
- *When lockdown ends for everyone else, I will still be locked down. I pay Council tax. I can't walk and I can't cycle. I'm not a very emotional person but this upsets me. If*

you don't live this life, then you don't understand. The proposals are NOT proportionate to the risk.

- *Recently, I had a very traumatic experience taking my elderly mum to Specsavers. Hadn't been into town for a while so were surprised to find roads closed off even to Blue Badge holders. This ended up with husband having to drop me and mum off at the other end of Westgate St, meaning it was quite a walk for my parent. Afterwards, when we came out, husband had been moved on by traffic warden and wasn't there to pick us up. My mum almost collapsed.*
- *It is unfair to not allow Blue Badge Holders as visitors to park. It will affect people's ability to re-engage after lockdown, to visit family and friends.*
- *Unevenness of pavements. Very difficult for mum who uses a rollator. Pavements are so unsafe mum cannot go out alone.*
- *The Georgian Disneyland design has to be practical for disabled people. If it isn't then it will just become like a Shopping/Leisure place for only able-bodied people, where I won't be welcome.*
- *Carers often need to stick to a buttoned-down routine. If the hurdles to visit the City Centre are too great, carer may feel it is too much of a challenge for them.*
- *Loss of Blue badge parking affects some people with Dementia and their carers. One often needs to keep things simple.*
- *Access to toilets is vital. This can be even more difficult if carer is another gender.*
- *Too much waiting around would be difficult for some individuals if access to car not made easy.*
- *Distances are important as falls can occur.*
- *Routines for some people is very important.*
- *Wellbeing can be affected if people are no longer able to visit places that are familiar.*
- *If I had chosen Bath with these restrictions, I would have to try to move somewhere else.*

Regarding Taxis, Busses and Coaches:

- *Why are taxis banned? They are all licenced and registered already.*
- *Some people with accessibility requirements usually travel into town by bus.*
- *Locations of stops and design need considering.*
- *Lack of colour contrast at the Bus Station, it's all grey.*
- *Can't see what bus is on the bay in the bus station.*
- *Raised kerbs at bus stops are not always in the right place – workmen put them in the middle, so the bus then has to park at the far end of the layby. Positioning of kerbs is very important – maybe there is a lack of awareness of the specification?*
- *There's a problem with a lack of accessible coach drop of places in the City Centre. Coaches with a lift in the middle of the vehicle – we need to consider where they can drop off safely, improvements may need to be made.*
- *There are no accessible toilets at Avon St, where coaches come in anymore.*

Car Parking:

- *Kingsmead Square shouldn't be closed to traffic. It should be used to provide more Blue Badge bays and parking for resident permit holders.*
- *As a resident it is hard to find a parking space*
- *Car parking spaces in the City Centre are too far away. Distance of Charlotte St Car park. Try and walk with a crutch in one hand and shopping in the other. And if it's raining, forget it, you will get soaked because you have no hand to hold an umbrella.*

Perceived Vulnerabilities:

- *Disabled people and older people (particularly women) more fearful of being attacked at night. They will not feel safe on a lonely long walk to a car park at night.*
- *Person, whose mother has dementia, can't leave her on a street corner near a destination and go and find somewhere to park. With a car it is so much easier.*
- *Having a row of parked cars can actually help protect people from a hostile vehicle attack – parked cars could provide a barrier.*
- *They have stopped traffic in some areas but not stopped people from cycling or skateboarding.*
- *Does this proposal allow bikes to come in?*
- *Bike access – conflicts with cyclists, whose right of way. Bikes are great if the environment is safe for others.*
- *Bikes are difficult for me. Sometimes they don't stay in their lanes. Also, I can't hear them if they ring their bell. Two-way cycle lanes are confusing.*
- *E-scooters need a bell or a beep to let people know they are there.*
- *Shouldn't cycles be banned from going through as well as cars? Scooters and cyclists are also a hazard. Whilst stopping Blue badge holders going into the centre of Bath will the same rules apply to cyclist with no identification, no registration and a quick means of 'get away' if chosen as a means of attack?'*
- *Terrorists – people with a rucksack can do a lot of damage.*

Accessing Services:

- *Organisationally it will result in the closure the service if this goes ahead. 99% of members have mobility issues. An alternative drop-off point is categorically not possible.*
- *It would potentially mean we couldn't do some things at all or would have to limit to the most mobile and independent who could get themselves there. We have already lost a lot of community involvement this year and I'm concerned this would restrict us further.*
- *Service providers don't want to deprive service users of the City Centre.*
- *Carers and things like Meals on Wheels deliveries would need permits.*
- *Proposals could make issues of loneliness and isolation worse.*
- *Bath offers lonely and isolated people a chance to feel part of the community.*

- *The community aspect of life is extremely important to the Deaf community, and with additional needs it's even more important to keep access as easy as possible to reduce isolation.*
- *Some people already don't visit Bath because of lack of accessible toilets and seating – it's not seen as a welcoming place even before these changes.*

Permit System:

- *Some will have difficulties applying.*
- *Would this involve a lot of extra form filling?*
- *Any permit would need to be free.*
- *Anything we can do to make it simpler has to be good.*
- *Are we cherry picking a particular group for permits though?*
- *What about others such as carers who are operating on tight timescales for their visits?*
- *What about visitors e.g., friend who is Blue badge holder, drives over from Bristol. Will the Council tell Blue badge holders where they can park?*
- *With a permit scheme it is very difficult to draw a geographical boundary – as there is a doughnut shape surrounding Bath which is North East Somerset, a different constituency.*
- *What about others such as carers, podiatrist, hairdressers etc. who are operating on tight timescales for their visits and sometimes carrying equipment?*
- *Some services for deliveries also offer contact with the outside world and a chance for someone to do a quick welfare check (e.g., Wiltshire Farm foods). This is a light touch community support and wellbeing.*
- *Resident Parking areas – if you live within a restricted zone, you should be able to have a BBH who is a friend or relative visit you and park.*
- *Taxis are vital for so many people, not just wheelchair users. A lot of older people have given up their cars because it's safer, easier and cheaper to use taxis. It would be simple to introduce a permit system for taxis.*
- *A permit system could be an option. But it needs to be made easy, with a control centre to manage it.*
- *Accessible taxis, could be an arrangement where they have a code they type in. It could be easily managed.*
- *Taxis couldn't be limited to Bath taxis, as you would need to consider taxis from South Gloucestershire, Bristol, Wiltshire, N Somerset (Airport). Therefore, one needs a phone number to ring to bring a person into the City Centre.*

Shuttle Service:

- *If a buggy/shuttle system is too complicated people will go elsewhere*
- *It would have to be free.*
- *It will be difficult for some people to transfer from their car to wheelchair to shuttle.*

- *It would mean that people can't be independent as they are when using their car and Blue Badge.*
- *If it's only for people with restricted mobility are you not risking those people being stigmatised and how do you control who uses it? Could such service be stigmatising?*
- *What about waiting times and could people wait that long?*
- *It would depend on how long I would be expected to stand and blazing sun or freezing cold.*
- *Shuttle service doesn't help people who shop and then put it in the car, they do a bit more shopping.*
- *It alarms me to some degree. It creates inequality.*
- *Not a solution for our service users as it would mean time consuming transfer of 12 people.*
- *How frequent? When using airports and Paddington, it can take ages to make the arrangements for a buggy service.*
- *What are the hours of operation? e.g. ..will it be running at night when people come out of theatre/restaurants/cinema/pubs?*
- *Where would this run from /to?*
- *Where would it stop?*
- *Will shelters/seats be provided for people to wait for the next shuttle?*
- *Will it be for those with restricted mobility only? If not, how long will disabled people be left standing if the shuttle is full.?*
- *Will it be fully accessible for wheelchair users both electric wheelchairs and manual?*
- *Will a person on their own in a manual wheelchair be given assistance to board?*
- *I would have serious concerns about the suspension – bumpy rides could be very painful for some disabled people.*
- *It would need to be 18 hours a day, or even 24/7 operation to ensure people are not disqualified if it only operates certain hours of the day. E.g. nightclubs are open until early hours. Young disabled people want the same as their friends*
- *As children with Autism are now entitled to a Blue Badge, do you think this form of transport is suitable for them?*
- *Travelling with other people who don't behave appropriately and are not understanding of Dementia can be a problem*
- *My mum has limited mobility so it would probably be too difficult for her to get on and off as she finds steps difficult (has to sit a swivel to get in and out of the car). May be useful for some disabled/older people though).*
- *Multiple drop off points in every street are needed. Room for doors to open both sides, giving enough space for people to be able to get in and out of cars safely.*
- *Unevenness of pavements. Very difficult for mum who uses a rollator. Pavements are so unsafe mum cannot go out alone.*
- *It would be good if the driver could say hello and goodbye in BSL.*

- *If it's electric – silent vehicles moving at speed are very dangerous*
- *It sounds great but when you look at it I see a lot of practical problems with it.*
- *Getting down to basics, as a disabled person when you need to go home, you need to go. E.g. to rest, or to get to the toilet etc. Waiting for a shuttle could be difficult for disabled people.*

Shopmobility:

- *Shopmobility is a godsend. Did use it regularly when injured initially. I have also used Shopmobility in other places.*
- *Current location of Shopmobility is too far away from the central shops/services though.*
- *Staff at Shopmobility did used to meet people across at Manvers St car park with wheelchairs which was good.*
- *The problem with Shopmobility in Bath is that the pavements in Bath are terrible and dropped kerbs are inadequate.*
- *There was a proposal to move Shopmobility to the basement of Southgate carpark, but it wasn't progressed.*

Administration:

- *Delivery plans – initial proposal put all the onus onto the person trying to arrange it, and some people can't do this.*
- *I have had no lessons in technology. I live on my own and it gets difficult and frustrating – it has an impact on your mental health. I would starve (if I had to go online to make special arrangements to organise food deliveries)*
- *Arranging deliveries would be extremely difficult.*
- *Initial proposal is not considered practical.*
- *This shouldn't be a problem that is left for City Centre residents to solve/manage.*
- *There ought to be an officer in the council to manage it including urgent requests.*
- *Places like AO.com offer next day delivery – how can you give notice?*
- *Deliveries can turn up at odd hours.*
- *There isn't a system in place, like cargo bike delivery.*
- *I can't order online easily – I have to get someone else to help me with tech issues if I can't do things by telephone.*
- *Concerned about deliveries – if I live in the City Centre how does my amazon parcel arrive?*

Improvements:

- *It seems that the council want to design in a way that wouldn't upset Jane Austen. But partially sighted people need to be able to see street furniture.*
- *Lighting is often atmospheric, but partially sighted people need lighting to help navigate and a sense of security.*

- *Need to remove clutter from the streets (at a time when we are increasing things like parklets, café culture tables and chairs etc)*
- *Need clearer directions/signposting for Blue Badge holders. e.g. Barton St has 5 spaces, but they are very tricky to navigate to – so they are always empty.*
- *Motorbike parking – sometimes they park in the middle of a parking space and don't pay anything for parking.*
- *It would be good to have some free parking for disabled people in Southgate car park. It's an added cost for disabled people. Could the Council obtain some free spaces in Southgate shopping centre?*
- *Concerned about nearest drop off points e.g., the theatre, nearest drop off point will be Sainsbury's.*
- *One needs to employ wardens to give people access through the bollards.*

Specific Streets:

- *Street furniture – example of Kingsmead Square, it's a jumble of benches, bollards, cycle racks, raised areas in the road. And new café areas will be additional clutter – a nightmare for those with mobility issues or visually impaired people.*
- *It would be useful to have some more Blue Badge Bays near Waitrose on Walcot St.*
- *Kingsmead Square – chairs and tables can fit on pavements, there is no need to put them in the road.*
- *Remove 24-hour Loading bays at Bog Island/Terrace walk. There is no need for loading at 10/11pm at night. Release them for Blue Badge holders in the evenings.*
- *Getting to the crossing at Dorchester St is a problem.*
- *Camber of pavement Manvers Street by the car park – very bad and not safe.*
- *In Milsom Street there are bollards on the pavement, big concrete bollards designed by traffic engineers. They are difficult to negotiate. Need to be designed with accessibility in mind, reflectors etc. Could the bollards be moveable?*

Specific Issues:

- *Lack of Seating*
- *Lack accessible toilets*
- *Lack of kerbs to detect by cane*
- *Delineators/corduroy - hard to know which side you are on*
- *Lack of dropped kerbs*
- *Uneven paving slabs*
- *Cobbles are difficult.*
- *Slippery drain coverings*
- *A Boards and other clutter*
- *Queues*

- *Shared space confusing people*
- *Pavements in Bath are very narrow*
- *Busy paving patterns*
- *Be clear where the road is and where the pavement is*
- *It's particularly difficult when it's wet, rainy, or icy as can be slippery.*
- *Streetlights – in some places it's a bit dark at night.*

5.3. A Stakeholder's Analysis

Given the extent and effort that went into their analysis, the following are observations and suggestions for a solution to the reduction in parking for Blue Badge holders provided by one of the Stakeholder panellists. Please note that some of these observations and suggestions relates to temporary restrictions due to COVID-19 and that some relate to long-term changes that have taken place over time. Our recommendation is that as many spaces as possible are reinstated, prior to exploring opportunities for additional spaces that may be deemed necessary as mitigation measures. We have compiled and conveyed a selection of what they wrote as follows:

General observations:

I note the LOCAL AUTHORITY revisited its Equality Impact Assessment on 30/7/20 and has provided further comment in relation to Blue Badge holders. However, it continues to use the word 'may' in relation to adverse impact (3.3) which falls far short when clearly there is a definite adverse impact so should be recognised by the word 'will'.

An Equality and Human Rights Commission report entitled: Being disabled in Britain: A journey less equal and the panellist highlighted the following:

- *Page 6 The significance of living independently.*
- *Page 7 The imperative to not treated be treated less favourably.*
- *Page 8 The sense of wearing a "Badge of shame" ... i.e., still not being treated equally.*
- *Page 12 Worries that individuals have about physical attack on streets.*
- *Page 12/13 How poor access to a car affects community and social life of disabled people.*
- *Page 13/14 Concern at the lack of implementation of accessible transport planning*
- *Page 14 Recommends action taken to strengthen disabled people's autonomy and choices.*
- *Page 20 Reference to the Convention on Rights of Persons with Disabilities (CRPD)*
- *Page 20/21 Reference to the Human Rights Act*
- *Page 61 Additional costs faced by disabled people in later life.*
- *Page 74 Extra costs incurred by people with disabilities.*
- *Page 75/76 Disabled people's struggles to remain connected to others and relevance of car access.*

- *Page 124/125 Perceived unsafe walking in local area/disabled women most likely to feel at risk.*
- *Page 143 With regards to access to services, disabled people feel trapped by cost and limited options*
- *Page 144/145 Compound effect that cuts to bus routes has on options.*
- *Page 149 Limitations on use of leisure activities for those without a car*

Loss of spaces, including some to current restrictions for Covid-19:

- *Westgate Buildings loss of single and double yellow lines on entire length of right-hand side and a couple of spaces outside Halfords*
- *Quiet Street: Loss of yellow lines when Pay and Display was installed. This meant previously available parking for Blue Badge holders was lost as the Pay and Display spaces are rarely available. Since the pandemic 2 Pay and Display spaces have been converted to Blue Badge Bays*
- *Milsom Street: On right hand side all the Pay and Display parking the entire length of the street has been lost along with the single and double yellow lines along a large part of the left-hand side. Loss of 4 spaces at top outside Paperchase*
- *The Cross Bath: Loss of access to yellow lines by proposed installation of bollards at junction of Hot Bath Street and Beau St (particularly valuable for Blue Badge holder parking for the Little Theatre and Help the Aged Day Centre)*
- *York St: Loss of Pay and display as well as yellow lines. The end of York street near Stall street was cut off some time ago; this was a very convenient place for Blue Badge holders to park for the middle of the shopping centre.*
- *When the lines on Terrace walk were effectively removed from use by Blue Badge holders by the imposition of No Loading restrictions this was a further reduction on available parking for Blue Badge holders.*
- *Barton St yellow line loss which was turned into permit parking 2 years ago so is now always full.*
- *The issue of neighbouring low traffic neighbourhoods (LTN) needs to be addressed as how this is implemented could have an impact on available parking Blue Badge holders.*
- *3 or 4 spaces Upper Borough Walls fairly recently created (from Middyay) to replace the Blue Badge space lost in Saw Close.
(The 4 spaces in New Bond Street are still there if people realise you can access them via Old King St/John St and Quiet St)*

Yellow Lines Lost owing to current Covid-19 restrictions

- *Broad Street bollards*
- *Milsom St at the bottom (road closure)*
- *Kingsmead Square and Avon St (road closure)*
- *Cheap St/Westgate St/Upper Bough Walls (road closure)*

- York St (road closure)
- Bog Island Bollards
- Monmouth St opposite Halfords/Tesco Bollards
- Dead end street by Forum bollards
- Queen Square -some ends or rows of paid parking

On Street Pay Parking Lost owing to current Covid-19 restrictions which would otherwise be free and unrestricted time for Blue Badge holders

- The length of Milsom Street on Right hand side
- Walcot St outside Harvest and in the bend northwards
- Street by the Forum
- 3 sides of Queen Square
- Monmouth Street - entire length near Ustinov
- Monmouth Street - outside Halfords
- Monmouth Place
- Chapel Row - all

Proposals for an increase in Blue Badge holders parking

- Abolish charges for Blue Badge holders in B&NES car parks.
- Broad St Car park: current provision 5 spaces. Increase to 10.
- Change all parking spaces in Quiet St to provide either Blue Badge spaces or yellow lines. This was a good place to park before it was converted to Pay and Display. Now it's always full even with the 2 new Temporary spaces created this will be inadequate once the City Centre reopens
- Remove no loading marks in Henry St to keep Double Yellow lines available.
- In Street by Forum provide Blue Badge spaces
- Remove bollards in Monmouth Street to allow either Blue Badge spaces or single yellow lines -near Halfords and near the Ustinov to replace lost parking in Kingsmead Square.
- Seal off Kingsmead Square further north to allow the northern end of Avon street with the shops be end on to the pavement which would allow access and egress. This would retain the integrity of Kingsmead Square for the open space desired.
- Increase Blue Badge spaces in Beau Street linking Gainsborough hotel with Stall street. There are currently 4 Blue Badge spaces limited to 4 hours.
- There are Blue Badge spaces in Westgate Buildings leading to Stall street, but these are usually full - so increase the number of Blue Badge spaces here.
- Remove the No Loading restriction in Terrace Walk; this may have been relevant when coaches used to draw up there but no longer is needed.

- *Change some residents Parking Bays and Pay & Display bays to Blue Badge spaces the replace the 3 spaces (shared with Loading use) lost in Upper Borough Walls and the loss of yellow lines outside Pizza Express in Barton St.*

Other Mitigations

- *Allow Blue Badge holders to register their vehicles with the local authority to access the City Centre at any time by use of ANPR.*
- *Allow taxis to register in same way and for them to enter also via ANPR.*
- *Change loading bays from 24 hours to the most used periods during the day.*
- *Do not have the restrictions 24 hours per day 365 days per year*
- *The Chief constable says the proposals should be PROPORTIONATE and intended for areas/times when footfall is highest.*
- *Therefore, allow parking for Blue Badge holders from late afternoon (as per Canterbury before 10:30 and after 4:30 and York after 5pm)*
- *This will enable early/late shopping for Blue Badge holders as well as access to entertainment venues/theatre/restaurants/pubs in the evening.*
- *This in turn will revitalise the City Centre. Until the City Centre is out of lockdown it is impossible to say how long it will be before the City Centre is as busy as it was pre-pandemic.*

Further Commentary

- *Even these measures are by no means replacing the amount of parking that has been removed and was accessed particularly by Blue Badge holders. If you add the amount of Pay and Display also lost it is a huge amount. It needs to be recognised that Blue Badge holders do not park only in Disabled Parking spaces...*
- *One often sees reference to “no Blue Badge spaces have been removed” which suggests it’s not fully understood that Blue Badge holders park in Pay and Display spaces/residents parking and on double and single yellow lines. It is vital this point is understood by those designing schemes.*
- *For this reason I oppose the proposal to exclude Blue Badge holders from parking in Residents parking area (is it intended Blue Badge holders who live in an area will be given a free permit?) this will make it difficult for Blue Badge holders to visit friends and relatives in other areas of the City.*
- *The amount of general Pay and Display parking and loss of yellow lines with the proposed Active Travel schemes (Upper Bristol Road and North Road) where it is proposed parking is removed to make way for cycle lanes will mean that Blue Badge holders will find it increasingly difficult to park close to where they need to be.*
- *This drip, drip, drip of parking space removal (including Pay and Display and yellow lines) is undermining the essence of the Blue Badge Parking scheme. The Councils own Equality Impact Assessment of October 2011 (Blue badge reform Program and Changes) states on Page 5 states that “the Blue Badge Scheme gives severely disabled people access to vital services and a better quality of life by improving access to parking”. It appears that the Local*

Authority is making proposals which directly contradict the aim and purpose of the Blue Badge Scheme.

- *All this comes following restrictions to access Yellow lines in Stall St, Abbeygate Street leading to Abbey green, (near M&S) end of York Street leading to Stall Street. all implemented over a period of time.*
- *It would be a good idea if Banes sent a surveyor to measure the length of available parking lost both yellow line (single and double), Pay and Display parking bays on street and Blue Badge spaces.*
- *This is the measure of the problem now faced by Blue Badge holders, many who are elderly, use walking aids. As well as disabled younger people. Blue badges are not always awarded to physically disabled people but also to those with hidden disabilities and I feel strongly that many of B&NES residents are being forgotten by the local authority.*

5.4. Other Stakeholder Evidence

Transport for All have just published in January 2021 a report called “Pave The way -The impact of Low Traffic Neighbourhoods (LTNs) on disabled people, and the future of accessible Active Travel.” Although the report is on LTNs rather than security areas/zones, there is much in the way of valuable evidence in this report to take account of. Rather than summarise the observations in this report, we strongly advise readers of this report to refer to it as it provides numerous insights, many of which underline the significance of the topic limiting access to urban areas, otherwise known as LTNs.

5.5. B&NES’s Preliminary Post-Consultation Considerations

The following captures some of the council’s post-consultation analysis and an exploration of mitigations:

Original Proposals:

- **10.00am to 6.00pm Anti-Terrorism Traffic Regulation Order (ATTRO)**
 - *Unrestricted Access: Emergency Services, Utilities, Pedestrians and cyclists*
 - *Exemptions, CCTV Controlled Authorised Access for: Construction vehicles, Highway cleaning and Maintenance, Bank and Building Society Cash in transit, Residential moves, Large theatre and film equipment, Royal Mail (incl. Parcelforce), Temporary Events (e.g. Christmas Market)*
 - *No Vehicle Access for: Residential vehicles, Residential deliveries for small items (e.g. food deliveries, small parcels), General Car Parking, Blue Badge holders, Taxis and Hackney carriages.*
- **Original 6.00pm to 10.00am Traffic Regulation Order (TRO) proposal:**
 - *Unrestricted Access: Emergency Services, Utilities, Pedestrians, and cyclists*
 - *Exemptions: CCTV Controlled Limited Access for: Shop and business deliveries/ collections, Market Traders, Theatre Equipment, Waste collections, B&NES Parks service maintenance, Home delivery for larger items (e.g., white goods)*

- *No Vehicle Access for: Residential vehicles, Residential deliveries for small items (e.g. food deliveries, small parcels), General Car Parking, Blue Badge holders, Taxis and Hackney carriages.*

Main hierarchy of concerns expressed by consultation:

- *Impact on Vulnerable groups e.g. blue badge, mobility, learning disabled, non-sighted.*
- *Justification for proposals*
- *Impact on businesses*
- *Impact on City Centre Residents*
- *Proposals disproportionate*
- *Perceived excuse to pedestrianize the City Centre.*

Main objections/ suggestions of respondents:

- *Vulnerable groups/ blue badge should have access at all times.*
- *Negative impact on businesses: deliveries should be allowed (particularly with Covid).*
- *Negative impact on business night-time economy.*
- *Negative impact on City Centre residents re: access, parking and deliveries. Residents should have access.*
- *Additional disruption at night-time for City Centre residents due to night-time deliveries / works etc.*
- *Justification for proposals questioned and disproportionate to threat.*
- *Proposal for permits/ licenses to be given to blue badge/ deliveries/residents/ taxis.*
- *Inappropriate timing and lack of publicity. Need more consultation.*

Responding to Consultation

- *The response to the Consultation needs to consider:*
 - *The responses received from the public and Stakeholder's as part of the Consultation.*
 - *To recognise that the largest number of objections was from disabled people, but also consider impact on residents and businesses.*
 - *The issues arising from the Accessibility Study.*
- *Balance the Risks of Security Against Accessibility Impact Assessments have been carried out for:*
 - *The Anti-Terrorism Traffic Regulation Order (ATTRO) (10.00am to 6.00pm) with various potential mitigations and ATTRO amendments assessed.*
 - *The Traffic Regulation Order (TRO) (6.00pm to 10.00am) with various potential mitigations and TRO amendments assessed.*

- *What are the national threat levels in the UK? Explanation of Threat Levels:*
 - *Critical: An attack is highly likely in the near future*
 - *Severe: An attack is highly likely*
 - **Substantial: An attack is likely** (current national threat level in the UK)
 - *Moderate: An attack is possible but not likely*
 - *Low: An attack is highly unlikely*

Revised Proposals:

- *In reviewing the responses to the public consultation and the recommendations made within this report, Council officers, in conjunction with the Police, have considered a number of potential modifications and mitigations to the original proposals as summarised below:*
 - *No restrictions between 6.00pm to 10.00am in recognition that the previously proposed TRO could not be considered as being proportionate to the risk of a terrorism threat when the streets are not as crowded.*
- *And:*
 - *A proposal to modify the ATTRO to between 10.30am to 6.00pm to provide a greater window of access to the restricted streets outside the ATTRO hours, particularly for blue badge holders up to 10.30am. Time limited parking would be available for blue badge holders between the hours of 6.00pm and 10.30am. This proposal would also include mitigations such as significant additional Blue Badge holder parking in streets adjacent to and nearby the restricted streets.*
- *Or:*
 - *A proposal to maintain the ATTRO between 10.00am to 6.00pm, but to permit Blue Badge holder access (via protocols to be determined) into the restricted streets during ATTRO hours of 10.00am to 6.00pm. Time limited parking would be available for blue badge holders at all times.*

Other Considerations [urgency/extent/options dependant on which of above alternative revised proposal are taken forward]:

- *Additional On-Street Blue Badge spaces in adjacent/ nearby streets. [numbers to be determined]*
- *Additional Off-Street Blue Badge car park spaces in Council car parks. [numbers to be determined]*
- *Having first looked at council car parks, discuss scope for free Blue Badge provision within Podium and Southgate car parks whilst recognising that they are private car parks and the feasibility of them doing this may be limited.*
- *Additional loading and unloading measures in adjacent/ nearby streets.*
- *Improvements to disabled access at Kingsmead Square car park (considering a ramp at the north end and potentially a more accessible footway at the existing vehicle entrance point).*

- *Switch administrative burden such that B&NES manage requests for deliveries/ collections/ access.*
- *20 Day Notice period for “Access Requests” to be reduced.*
- *Provision of electric shuttle bus (free to elderly and blue badge)?*
- *Provision of Shopmobility.*
- *More seating within City Centre.*
- *Improvements to surfaces on routes for disabled from parking bays/ car parks.*
- *Potential controlled pedestrian crossing at Westgate Buildings.*
- *Note significant capital and ongoing revenue costs to above proposals.*

Other potential Mitigations from Accessibility Report [urgency/extent dependant on which of above alternative revised proposal are taken forward]::

- *Improve specific pick-up/ drop-off outside security areas for general public.*
- *Taxi pick-up and drop-off to be improved.*
- *Retain/ improve existing bus stops to optimise arrival/ departure times.*
- *Improve wayfinding facilities.*
- *Review use of cycles and e-scooters and consider limits if necessary.*
- *Provide information that can easily be understood: In Plain English/ Translated into Easy-read/ Communicated with Makaton symbols (and signage).*
- *Locate, map and communicate quiet spaces and places.*
- *Improvements to toilets*

5.6. Examples from other Cities

Bath & North East Somerset Council have also obtained information pertaining to examples of access provision in other local authority City Centre areas. However, it is worth noting that whilst these examples are useful points of reference, the situations and circumstances will differ and that what may have been considered applicable in one situation doesn't necessarily translate to another. Moreover, each local authority has its own duties under the Public Sector Equality Duty to follow a process that achieves an equitable outcome, rather than solely rely on what others have done. Notes taken by Bath & North East Somerset Council with regards to what other local authorities have done are as follows:

Canterbury:

- Pedestrian zone operates 10.30 – 16.00 daily.
- Bollards in place 24hrs/ 7 days a week
- 24-hour access for the following groups:
 - Residents & others with City Centre access permits
 - Emergency services
 - Medical practitioners e.g., midwives & GP's
 - Armoured security vehicles

- Between 16.00 and 10.30 (outside the pedestrian zone hours) the following are permitted:
 - Deliveries to businesses and residents and collection of trade waste
 - Blue badge holders
 - Royal mail collections from Post Office and letter boxes
 - Road work contractors and utilities
 - Delivery of large theatrical equipment

York:

- 'Footstreet' (pedestrian streets) hours between 10.30 and 20.00 daily.
- No Blue Badge Holder between these hours.
- City Centre access for those with mobility issues:
 - Provide parking on streets next to restricted area
 - Ensure access for Dial-a-ride services
 - Support and promote alternative services such as Dial-a-ride & Shopmobility
 - Have included locations of disabled access toilets
- Parking for Blue Badge Holders is available at:
 - All Council carparks, any bay, free and without limits
 - Disabled bays in all Council carparks, free and without limits
 - Double and Single Yellow Lines, except no loading lengths, free, up to 3 hours
 - Taxi shuttle service
- Exemptions to restrictions:
 - Emergency Services
 - Emergency utility works
 - Security deliveries
 - Dial-a-ride
- Further information:
 - <https://www.york.gov.uk/york-city-centre/city-centre-access-vehicles/1>

Chester:

- Community toilet scheme - including disabled access toilets
- Assessment of access points for hard-to-reach areas of the City Centre
- Support services such Shopmobility provided
- Location of specific car parks and Blue Badge holder spaces near pedestrian zone
- Further information:
 - <https://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/living-independently/living-with-a-disability/getting-out-and-about/access-guides.aspx>
 - <https://www.cheshirewestandchester.gov.uk/documents/social-care-and-health/health-and-wellbeing/living-with-a-disability/chester-city-centre-access-guide.pdf>

6. Observations

6.1. Persona Narratives

Our approach hinges around the use of representative Persona Narratives and understanding probable impacts for Persona Journeys. Persona Narratives are collective and broadly representative storylines. As explained in our methodology section, in order to generate these Persona Narratives, we use the “Envelope of Need” approach to circumscribe 5 universal areas of need that everybody has and that lead to specific requirements for specific individuals:

1. **Mobility** (including wheelchair users and walking aid users),
2. **Visual** (including blind and partial sighted users with/without guide dogs and/or canes),
3. **Auditory** (including Deaf and hard of hearing users),
4. **Neurological** (including people living with Dementia, on the Autistic Spectrum etc.) and
5. **Metabolic** (including users living with dietary and/or toilet related requirements)

In addition, we seek to take account of:

6. **Companions** with “support” roles, with relevance to parents of young children and pregnant mothers.

6.2. Scenarios

Over and above the above Persona Narratives there are Scenarios that arise as a result of the context of the proposals. These Scenarios are encapsulated by personas who are:

- A. **Residents** - those with accessibility requirements who live or have businesses in one or other of the areas affected and have need of access and deliveries
- B. **Workers** - those with accessibility requirements who work in one or other of the areas affected or are visiting on business
- C. **Shoppers** / Service Users – those with accessibility requirements who wish to access shops and/or services in one or other of the areas affected
- D. **Tourists** – those with accessibility requirements who wish to enjoy the tourism/visitor opportunities

6.3. The “Mobility” Narrative

Our “mobility” related observations with regards to the proposals (including taking into account the experiences of wheelchair users, walking aid users and others who find mobility difficult) are as follows:

- There are some inherent positive benefits of reducing uncontrolled vehicular access:
 - Reduction in vehicular access could make it easier to get around the project areas for some people with mobility difficulties where they have the means of operating powered chairs and mobility buggies, since this could mean that they could have use of the road surface (subject to the resulting highway status of the road surface and powered mobility device classifications) and could have an alternative, where pavements are too narrow or uneven.

- However, proposals as they currently stand would give rise to a significant increase in horizontal distances of travel because of changes, bearing in mind that 50m is nominally considered within guidance and mobility assessments to be the maximum horizontal distance one should expect someone with mobility difficulties to have to travel horizontally before encountering a point at which they can rest, and even then, many find 50m too far and painful. To give an indication of relative distance, the situation within the City Centre of Bath is that:
 - from Dorchester Street to Upper Borough Walls, there is nominal horizontal distance of 500m
 - ...and then up to the top of Milsom Street there is a further nominal distance of 250m
- There would be significant topographical level changes, bearing in mind the maximum recommended overall vertical travel for unassisted accessibility is 2m. The situation within the City Centre of Bath is:
 - from Dorchester Street to Upper Borough Walls, there is nominal change in altitude of 14m
 - ...and then up to the top of Milsom Street change there is another 5m further change in altitude
- Moreover:
 - Powered chairs and mobility buggies do not suit everybody, owing to the differing control that one needs to have in order to operate different kinds of chair/buggy,
 - Distances travelled in chairs and buggies can exert vibration and jolts upon users that can result in increased pain and discomfort.
 - Independently propelled manual alternatives require significant upper body strength and control if used for long periods of time over longer distances and significant vertical rise or falls in gradient.
 - Those pushing manual alternatives or attendant only chairs over long periods of time over longer distances and significant vertical rise or falls, often require sufficient strength to do so and do not always have this strength, especially in such circumstances as when a partner or companion is also elderly or has their own mobility difficulties.
 - The current urban realm consists of many uneven surfaces and insufficient dropped kerbs.
- The above distances and topography would have implications for the effectiveness of the following alternative places of arrival (in relation to destinations):
 - general on street parking
 - blue badge on street parking spaces
 - blue badge parking on yellow lines
 - off-street parking alternatives
 - drop-off points and pick-up points that can be used by the general public
 - taxi drop-off points and pick-up points
 - bus stops
 - coach and rail stations

- The above distances and topography would have implications for the effectiveness of the following destinations (in relation to places of arrival):
 - shops, including the post office
 - the theatre
 - pharmacies
 - pubs and restaurants
 - key destinations such as other shops and services
 - where people live in or very close to the project areas
- The importance of the quality of routes to and from alternative points of arrival, may give rise to changes needing to take place in relation to the:
 - quality of parking bays and other arrival points such as bus stops
 - availability of dropped kerbs
 - evenness of route
 - widths of route
 - obstructions on route
 - addressing problems associated with changes in level along routes
 - the availability of level resting places and seating on route
- As the access audit of 2015 would testify, many of the above are not as yet satisfactory.

Other than concerns over distances, routes travelled and the quality thereof, other factors also pose concern to respondents to the public consultation (and are not uncommonly raised by disabled people in general), such as:

- abuse of blue badge bays
- bays being used by residents with access needs being constantly occupied by others
- pedestrianised and/or pedestrian prioritised areas where pedestrians have to share spaces with other vehicles
- conflicts with authorized and or unauthorized cycle and e-scooter use of pedestrian areas, with insufficient policing

6.4. The “Visual” (and “tactile”) Narrative

With regards to the proposals, our “visual” realm related observations (including taking into account the experiences of blind and partial sighted people) are as follows:

- Blind and partially sighted people will experience similar difficulties to those experienced by people with mobility difficulties, since not being able to see clearly has an impact on how swiftly and safely one moves:
 - Distance travelled from point of arrival to destination will be a factor whilst utilizing remaining sensory information and maintaining concentration on where one is going. The longer the distance, the less likely it is that some blind and partially sighted people will be able to navigate independently.
 - Many blind and partially sighted people will be dependent on:

- Someone else driving and parking somewhere for them, either whilst travelling in a private vehicle whilst using a blue badge and/or via a taxi
- Public transport such as bus, coaches and taxis
- Blind and partially sighted people can often be fearful of collisions with vehicles, cyclists and e-scooters
- Consequentially the following becomes important:
 - Location and quality of points arrival will be of significance, such as:
 - Bus stops
 - Taxi pick-ups
 - Blue badge parking
 - Drop-off and Pick-up point
 - Quality of routes from points of arrival will be significant. In particular:
 - The relative location of destinations in relation to points of arrival
 - Evenness or otherwise of the route
 - Visual clarity and use of contrast (or otherwise) on route, such as:
 - at the point between pavement and roadway
 - street furniture in relation to background
 - Availability and or adequacy of existing tactile surfaces to:
 - delineate between pedestrian and vehicular areas
 - warn of hazards
 - Adequacy of lighting in terms of:
 - Illumination of surfaces,
 - Attention being given to where potential hazards exist
 - Avoidance of glare
 - Identifying the presence of trip and fall hazards that would not otherwise be easily perceived
 - Clarity of wayfinding at the earliest opportunity to enable the facilitation of efficient navigation through the City Centre between points of arrival and destinations.

6.5. The “Auditory” (and “alternative communication”) Narrative

With regards to the proposals, our “auditory” realm related observations (including taking into account the experiences of Deaf and hard of hearing people) are as follows:

- The auditory environment is likely to change as a result of proposed limits to vehicular access and although streets may be quieter, other issues may become more prominent. Such as:
 - Access to information
 - Fear/risk of collision as a result of not hearing cyclists and e-scooters
- Consequentially the following becomes important:
 - Giving consideration of how changes are communicated

- Exploring ways of reducing the fear of collision through exploring greater separation between cyclists and e-scooters

6.6. The “Neurological” Narrative

Our “neurologically” related observations (including taking into account the experiences of people on the autistic spectrum, living with dementia etc) are as follows:

- Many of the issues concerning mobility, visual and auditory needs will pertain to people’s neurological needs
- Some respondents drew attention to:
 - The psychological benefits of being able to gain access to one’s City Centre,
 - The importance of those living with dementia, who are on the autistic spectrum, have learning difficulties or have other neuro-diverse conditions (possibly in conjunction with other mobility, visual, hearing and metabolic needs) gaining access to the City Centre.
- Consequentially the following becomes important:
 - Not introducing paving patterns that would cause confusion or visual noise
 - Not introducing lighting that is known to give sensory/neurological processing issues
 - Providing information that can be easily understood, such as:
 - in Plain English,
 - translated into Easy Read
 - and communicated with Makaton symbols (and signing where appropriate)
 - Locating, mapping and communicating quiet spaces and places where one can go if stressed, would be beneficial.
 - Wayfinding improvements in order to facilitate navigation through the City Centre.

6.7. The “Metabolic” (aka “convenience”) Narrative

Our “metabolic” related observations (including considering the experiences of people with particular dietary and/or toilet related requirements) are as follows:

- Most of the observations pertaining to mobility will apply to people with toilet access needs since:
 - Distances travelled and time taken to get to places will tend to influence whether or not some individuals can run the risk of not getting to a location where there is a toilet in time.
 - Increasing the distances between points of arrival to destinations will potentially lead to people with toilet access related needs not risking a journey.
- Consequentially the following becomes important:
 - Existing public toilets and clarity as to their location and availability
 - Providing/establishing toilet provision in close proximity to arrival points such as coach stops and car parks.
 - Information with regards to the availability of toilets within City Centre premises such as shops, cafes etc., and whether they are wheelchair accessible or not,

will be particularly beneficial and worth mapping and engaging owners of premises in supporting this.

- Information with regards to an adult Changing Places toilet

6.8. The “Companion” Narrative

Our “companion” related observations (with relevance to parents of young children and pregnant mothers) are as follows:

- Everything listed above will be significant to companions of disabled people with support roles, especially when it comes to:
 - Distances over which they might be expected to assist
 - Vertical travel if they are pushing someone who uses a wheelchair
 - Duration and distance over which they may need to steady and offer support to someone who is unsteady on their feet or in pain
 - Finding resting places where they and those they are supporting can rest on their route
 - Finding toilets and adult changing places toilets
- Moreover:
 - Parents of young children will also benefit from the above access considerations in addition to the availability of baby changing facilities and information about where they can be found
 - Pregnant mothers will also benefit from resting places and easy reach of toilet facilities
 - Breast feeding mothers would also benefit from information with regards to breast feeding friendly spaces

6.9. The “Resident” Narrative

Our “resident” related observations (with relevance to those with accessibility requirements who live in the City Centre or have businesses and have need of access and deliveries) are as follows:

- Some respondents either live in the area (or very close to it) who identified that they have access needs and would need access to blue badge parking/pick up points:
 - If there were to be access restrictions that didn’t exclude all Blue Badge users this could improve the situation for some blue badge users
 - Neighbouring streets however could be adversely affected by proposals and could worsen abuse of Blue Badge or residents parking
- Some respondents expressed concerns about deliveries and practicalities and problems that they are likely to experience:
 - This is likely to be particularly the case when taking into account diverse accessibility requirements identified above
 - It was apparent that some respondents felt that the administrative onus was too great for arranging access in particular scenarios
 - A consistent view was expressed that the administrative burden should be switched and placed on the team responsible for security and vehicle access controls

- Some respondents with businesses or services identified that those using their services are likely to encounter problems accessing them and greater thought needs to be given to these practicalities.

6.10. The “Worker” Narrative

Our “worker” related observations (with relevance to those with accessibility requirements who work in the City Centre or are visiting on business) are as follows:

- There are likely to be employees who work in the project areas who have access needs and whose journey to work may prevent them from getting to work without opportunity to enter the project areas
- Some people visiting on business, who have access needs could similarly be excluded from getting to destinations as a visitor, unless their journey was made easier

6.11. The “Shopper / Service User” Narrative

Our “shopper / service user” related observations (with relevance to those with accessibility requirements seeking to access shops and services) are as follows:

- The Bath City Centre provides for a variety of essential services, such as a central post office, opticians and pharmacists in addition to clothing shops, food / beverage facilities and entertainment facilities. Access to these facilities will be severely limited.
- Without access being given to service providers’ vehicles, there will be significant practical challenges to these service providers when it comes to providing access to the City Centre for individuals with learning and age related difficulties to the extent that some services could become unviable and other service providers who use their own transport vehicles would find the logistics of getting service users to destinations within the City Centre very difficult.
- Some service providers such as meals on wheels, care agencies and medical personnel are likely to find it very difficult to deliver their services to residents within the City Centre, especially if they need to carry things with them
- In these days, when people often seek to obtain purchases online, some may argue that people do not need to gain physical access to shops anymore, however this doesn’t take account of:
 - people who would find arranging deliveries problematic for technical knowhow and communication reasons
 - some people owing to sight impairments often needing to interact with others over purchase within a physical real-world environment where they obtain greater clarity multi-sensory with regards to purchases, either directly or when interacting with sales assistants
 - the social and psychological benefits of getting out of one’s house and visiting one’s local City Centre and meeting friends and family
 - the services that some people need to access that cannot easily be accessed elsewhere, such as a central Post Office
 - Being able to handle and look at the goods themselves, rather than look at them on screen, is beneficial to all people in determining the goods tactile and visual properties.

6.12. The “Tourist” Narrative

Our “tourist” related observations (with relevance to those with accessibility requirements who wish to enjoy the tourism/visitor opportunities) are as follows:

- Whilst it seems reasonable to assume that residents and local people with access needs ought to be given priority access to City Centre facilities, it is nevertheless important to acknowledge that some people with access needs will want to enjoy what Bath has to offer.
- Consequentially considerations pertaining to access ought to consider:
 - Visitor access Blue Badge holders
 - Information pertaining to where access parking can be found
 - Consideration of an electric shuttle service

7. Considerations Regarding Modifications

The following are a list of modifications/mitigations that B&NES are considering following our Interim Report. We have provided our observations/recommendations following each modification/mitigation:

- *No restrictions between 6.00pm to 10.00am in recognition that the previously proposed TRO could not be considered as being proportionate to the risk of terrorism threat when the streets are not as crowded:*
 - This is a positive proposal but would still deny disabled people access during the hours in which most would want to gain access to the City Centre if the measure were not accompanied by permitted access during the day.
- *Modify the ATTRO to between 10.30am to 6.00pm to provide a greater window of access to the restricted streets outside the ATTRO hours, particularly for blue badge holders up to 10.30am. Time limited parking would be available for Blue Badge holders between the hours of 6.00pm and 10.30am. This proposal would also include mitigations such as significant additional blue badge holder parking in streets adjacent to and nearby the restricted streets:*
 - These are positive considerations as they will lengthen the time in which people could make use of facilities. However, it is important to take into account the time consumed by some disabled people going through morning routines that some of us can take for granted, such that it is usually reasonable to assume that whenever planning something with disabled people in mind, it is not until mid to late morning that you can reasonably expect some individuals to arrive at a venue.
 - Therefore, whilst beneficial to some (and we wouldn't therefore advise against the improvement), it isn't likely to provide relief for those who are most likely to be excluded by the ATTRO. Moreover, there are lunchtime and afternoon social opportunities that disabled people will want to be part of too, from which disabled and elderly people are likely to find themselves excluded.
 - Consequently, our recommendation still stands that we would advise from an equity perspective that Blue Badge holders be permitted to access the restricted area to park at all times. If access is not provided at all times are still not possible then we would suggest that during lower footfall days or when threat alert levels fall beneath a threshold, then restrictions could be lifted.
- *A proposal to maintain the ATTRO between 10.00am to 6.00pm, but to permit Blue Badge holder access (via protocols to be determined) into the restricted streets during ATTRO hours of 10.00am to 6.00pm. Time limited parking would be available for blue badge holders at all times:*
 - This would be a very positive and reasonable proposal consistent with public consultation and stakeholder engagement feedback.
 - We would also recommend that specific organisations, who provide services to elderly and disabled people be provided with similar exemptions and reasonable allowance for the time it takes for them to deliver the service that they provide for their service users.

- *Additional On-Street Blue Badge spaces in adjacent/ nearby streets. AND Additional Off-Street Blue Badge car park spaces:*
 - We would recommend that such measures take account of the historic loss of Blue Badge Parking opportunities, including use of yellow lines and pay and display bays by Blue Badge holders, as well as that which would occur if restrictions were to be implemented.
- *Having first looked at council car parks, discuss scope for free Blue Badge provision within Podium and Southgate car parks whilst recognising that they are private car parks and that the feasibility of them doing this may be limited:*
 - This could be a very beneficial improvement and would help reinforce a wider Service model for the City Centre, whilst recognising it wouldn't in of itself solve the issues that disabled people face.
 - Southgate offers potentially significant advantages due to its proximity to the City Centre, because it provides protection from inclement weather (whilst people are getting in and out of their cars) and because it offers an opportunity to co-locate provision with a more advantageous location for Shopmobility.
- *Additional loading and unloading measures in adjacent/ nearby streets AND Improve specific pick-up/ drop-off outside security areas for general public.:*
 - Additional loading and unloading will be necessary in order to facilitate deliveries for which it is not possible to deliver outside ATTRO hours.
 - Additional locations whereby people may be dropped off or picked up would be essential if Blue Badge holder access restrictions were implemented. This would also be important where people don't possess a Blue Badge or cannot enter the restricted areas and yet have need of getting as close as they can to a destination.
- *Improvements to disabled access at Kingsmead Square car park (considering a ramp at the north end and potentially a more accessible footway at the existing vehicle entrance point):*
 - These improvements will be beneficial and arguably essential. However, it is important to note that:
 - The vertical change in level, that people would have to transition, is significant.
 - Respondents to Public Consultation and Stakeholder Engagement, have cited Kingsmead Square as a significant entry point to accessing the city, and that the roads leading into and out of Kingsmead Square (Avon Street and New Street) present significant Blue Badge Parking capacity opportunities if access to the City Centre security area/zone were limited.
 - However, if Blue Badge holders were to be permitted access to parking within the City Centre security area/zone at all times then this could significantly reduce pressure on Kingsmead Square in terms of the need to look for alternative means of accessing the City Centre. Even so:
 - We would advise that distances required for accessing Kingsmead Square will need to be kept to a minimum and that reliance on existing

Blue Badge parking in Kingsmead Square car park would still mean that travel distances for Blue Badge holders would be more than 50m.

- Consequently, improving access from Kingsmead Square and providing a ramp between the car park and Kingsmead Street would be necessary in order to go some way towards mitigating the impact that Kingsmead Square proposals would have, even if City Centre security area/zone proposals weren't going ahead.
 - We would also recommend that at least a drop-off and pick-up provision in New Street and the entrance to Avon Street be considered and that other Blue Badge parking options (as close to Kingsmead Square as possible) are explored so that travel distances of Blue Badge Holders are kept to a minimum, with the goal of keeping journey distances under 50m for blue badge holders.
- *Switch administrative burden such that B&NES manage requests for deliveries/ collections/ access AND 20 Day Notice period for "Access Requests" to be reduced:*
 - This is essential and would need the team tasked with security to also be tasked with enabling access and deliveries, such that they would perhaps be best described as "Access and Security" personnel, and not just be responsible for security.
 - This is important in order to maintain an enabling culture that avoids placing unnecessary hinderances to people seeking to gain reasonable access within the context of the Equality Act. If access were not within the job title and job description then staff could find themselves losing sight of the facilitatory role that would be a necessary part of the Council having to implement its duties under the Equality Act.
 - *Provision of electric shuttle bus (free to elderly and blue badge). AND Provision of Shopmobility:*
 - A shuttle bus or call-up service, if provided with enough capacity and frequency could make access easier and less stigmatizing, if it was also made available to people accessing the City Centre in general, however it is important that this is not to the detriment of disabled people and does not incur significant waiting around for the service to turn up.
 - However, it is essential to recognize that whilst an electric shuttle bus could provide some people with some benefit, some stakeholders interviewed were keen to point out its limitations.
 - Even so this realm of consideration essentially falls under the question as to what assistance could be provided should people have difficulty accessing the City Centre? This is especially the case if there were any restriction to Blue Badge holders gaining access.
 - If there was to be no restricted access for Blue Badge holder parking within the City Centre security area/zone, then this lessens the necessity for considering a continuously operating electric shuttle bus service, but still poses a question pertaining to access by those who don't quite qualify for a Blue Badge but find access difficult.
 - We would suggest that at the very least Shopmobilty should continue and in a better location than it is at present, especially during any changes that arise out of the final ATTRO. We would also suggest that a service such as dial-a-ride

could be considered as an option in terms of offering access to those without a Blue Badge but who could perhaps qualify for assistance from such a service, providing such an arrangement could be agreed.

- *More seating within City Centre:*
 - Seating that is compliant with BS8300:2018 Part 1 (in height, ergonomics, and other details), strategically located around the centre and not further apart than 50m would help a number of people. However, it is important that such seating tonally contrasts with surroundings and is not located in routes that would create obstructions for people with mobility and sight related needs/requirements.
- *Improvements to surfaces on routes for disabled from parking bays/ car parks:*
 - This is essential if access for Blue Badge holders was restricted and is strongly advised as part of ongoing improvements in any case.
 - It will need to include attention to matters such as introducing dropped kerbs where there is insufficient/inadequate provision and removing obstacles.
 - We would also recommend that other improvements will be necessary beyond initial routes identified.
- *Potential controlled pedestrian crossing at Westgate Buildings:*
 - Subject to an appropriate assessment of all the relevant issues, a pedestrian controlled crossing at Seven Dials Junction could be an important improvement, made more pertinent if Blue Badge holders were not to have access to parking within the City Centre security area/zone.
 - Even so, the lack of clarity both visually and in terms of tactile paving warning depth between road and pavement surface also presents a safety issue in of itself, irrespective of other proposed changes. Because it is on a significant pedestrian route, it is advisable that a controlled pedestrian crossing be considered separately as part of overall safety improvements.
- *Taxi pick-up and drop-off to be improved AND retain/ improve existing bus stops to optimise arrival/ departure times:*
 - Improvement to both taxi and bus facilities in the City Centre locality will be most necessary if Blue Badge holder access restrictions are to be implemented, in order to help mitigate challenges experienced by Blue Badge holders.
 - Even if Blue Badge holders were able to gain access, a commitment to look at what improvements could be made, would benefit those who have mobility difficulties who are not eligible for a Blue Badge and who already rely on means of accessing the City Centre other than by using private cars.
- *Improve wayfinding facilities AND locate, map and communicate quiet spaces and places:*
 - Whilst improvements to wayfinding would be made more necessary if Blue Badge holder access were restricted, it would arguably be beneficial for others not eligible to Blue Badges as part of overall ongoing improvements. Consequently, with the extension of routes for those not able/permitted to access the City Centre by car, we would recommend that wayfinding be seen as an important measure in terms of enabling people to navigate longer routes than they may be used to.

- Mapping quiet spaces and places within a wayfinding strategy could help those for whom urban and crowded environments can become overwhelming and where access to a car is not so immediate to them when seeking to find sensory refuge, relief, and rest. This approach would be consistent with current thinking with regards to neurodiversity and would help towards making Bath more Dementia and Autism friendly, as well as amenable to others with neurodiversity related conditions.
- *Review use of cycles and e-scooters and consider limits if necessary:*
 - If there is anything else, other than restricting access to Blue Badge holders, that causes disabled people to feel that their wellbeing and independence is being threatened within the public realm then it's when people are expected to share space with modes of transport that are faster than them and liable to collide with them such as when they are unable to see, hear, or move out of the way of hazards.
 - If significant effort is being put into implementing security measures then it is reasonable to expect that similar effort and human resources made available to maintain security are also charged with reinforcing separation between cyclists / e-scooters and what should be pedestrian only domains.
- *Provide information that can easily be understood: In Plain English/ Translated into Easy-read/ Communicated with Makaton symbols (and signage):*
 - Changes can often pass people with learning difficulties by or lead to anxiety if they are not able to understand such changes. Consequently, it is important to work with those working with people with learning difficulties in order to enable greater understanding of what it means for them.
 - It is not only Plain English/, Easy-read/ and Makaton symbols that ought to be considered but communications in Braille, Large Text, BSL, etc
 - Makaton on signage is not what we would advise, but that written communication is made available that uses Makaton symbols and that any recorded spoken communications are also available with a Makaton signer to prove signing supported speech.
- *Improvements to toilets:*
 - It cannot be understated how important access to toilets is to people seeking to go out for the day and who may have metabolic reasons why they need ready access to a toilet or, owing to reduced mobility, may have less opportunity to lengthen their journey and get to toilets in time.
 - Locating toilets near car parks and other transportation nodes would be important. Where it is not possible to provide public toilet facilities then we would suggest that B&NES partner with retailers, service providers and other venues to make suitably accessible toilets available and easy to find. Indeed, this may be considered preferable to public toilets in some regards as there may be greater scope to “keep an eye on” and maintain such facilities.

8. Recommendations

We will start with general recommendations, most pertinent to the City Centre Security area/zone proposals as there will be some relevance to the Milsom Street and Kingsmead Square proposals. However, we will pay particular attention to Milsom Street and Kingsmead Square proposals towards the end of our recommendations in order to pick up on particularities that arise within the context of these projects.

8.1. Risk Perspectives

It is recognised that Hostile Vehicle Mitigation (HVM) proposals are intended to reduce the risk posed by Vehicle as a Weapon attacks and that the HVM proposals are also part of a layered security system that includes awareness training for front line staff, additional CCTV, temporary HVM measures put into place for events such as the Christmas Market, and the Police's "Project Servator" which raises the presence of Police officers in the City Centre when necessary. However, we would also recommend that the risk perspective also considers the impact of proposals on people over time and the risks that these impacts have on individuals who would be adversely affected.

We therefore recommend, that whilst it is recognised vulnerability can come in the form of short and well recognised security related events, overall project assessment take into account the "vulnerabilities" experienced by multiple people as a result of the detrimental effect on their wellbeing over time. This is because the accumulative result of barriers and hurdles preventing people from gaining feasible access to destinations enjoyed by others can significantly affect people's wellbeing. In other words, if quantified, the accumulative effect of "slow disasters" affecting multiple individuals who are not within public attention, could outweigh the detrimental effect of "rapid disasters" and yet society tends to react and respond to "rapid disasters" because they capture society's attention.

Whilst an assessment of security is not our remit, given the pressures placed on accessibility posed by proposed changes (even with mitigations), there are questions that have been raised during Public Consultation and by those with whom we have talked to and discussed matters, such as:

- What will the proposed measures do to prevent terrorist attacks that do not involve vehicles?
- If someone was wanting to introduce a bomb; would they not use other means of entering the areas other than a vehicle?
- Is footfall the only criteria that terrorists look for, and are not local concentrations of people, such as outside pubs, clubs, places of worship and waiting for busses outside the security area/zone just as likely to also attract hostile vehicles?
- Is allowing Blue Badge holder access to the security area, any more likely to present a risk than any of the above and if not, then why consider that excluding Blue Badge holders limits the risk if, like water, the risk can be more easily directed elsewhere?

Mention has been made of security threat levels and that current national alert levels are at Substantial. Would it not be more reasonable and proportionate if restrictions were related to the threat levels in force at the time and only if the threat went higher than a particular level or there was particularly relevant intelligence would restrictions be increased? And, if threat levels dropped, would there then be scope to lift restrictions? Similarly, if it were known that footfall drops below a particular threshold on particular days in the week or year, could not restrictions also be lifted on these days?

We don't intend to be conclusive by raising these security questions but believe it important to address the "other side of the coin," through these questions.

8.2. The Service Design Paradigm

Bath City Centre is a significant Place, consisting of, architecture, streets, shops, other destinations etc. Consequentially, urban realm, highways, economics, sustainability, safety, security and accessibility considerations form an important part of how this Place functions. Place is therefore the context for what happens within. However, in order to achieve the most desirable outcome, it is firstly most beneficial to look at the City Centre from the perspective of the Service it performs:

- How would one describe the Service that the city needs to offer and what are the constituent parts to this service?
- What does the overarching Service of the city look like?

In other words:

- What does the City Centre do in the way of enabling its residents, workers, shoppers/service users and tourists/visitors to do what they want to do?
- How will it be experienced?
- Is it an inclusive experience?

Indeed, a key element of the Equality Act pertains to rights of access to Goods, Facilities and Services. Our overarching recommendation, therefore, is to consider how one approaches the issues that the council are seeking to address within a Service Design paradigm:

- The Service Design paradigm recognises that the value of project outcomes will not be realized in the physical component of the projects themselves, but in the User Experiences that are realized by the Service that the city offers as a whole.
- User experiences will be diverse and informed by differing perspectives.
- A Service is achieved through a combination of measures of which the physical components form just a part.

The Service Design Paradigm is why our observations utilized diverse needs-informed Persona Narratives and then further informed by Scenarios. This is so that we might elicit an understanding of the likely User Experience of the proposed Service and obtain an understanding of what the Service could be if it took account of diverse perspectives.

We have stated that the physical components form just a part of achieving a positive User Experience of Service outcome. The other two crucial components are operations (management) and communication, for without these two components a Service will fail to be realized and it will usually fail to achieve the necessary accessibility and inclusiveness for it to be equitable.

As we are taking a Service Design perspective whilst writing these recommendations, rather than refer to those that will manage the City Centre as security staff we have referred to them as Access and Security staff on the basis that this could help staff maintain a service perspective in all that they do. It is key that staff know their duty is to literally and metaphorically "remove barriers" to enable those coming to the city for legitimate reasons to gain access as much as it is to "place barriers" and hinder those seeking access for illegitimate reasons.

8.3. Shifting the Administrative Burden

It may be perceived by some that “Accessibility” is purely a physical matter. However, one of the major potential barriers could be the administrative burden that people are faced with. As it stands, the current proposals would appear to place some significant burdens upon people seeking permissions pertaining to particular kinds of deliveries.

A view, that was expressed during the public consultation, was that the proposed administrative burden for deliveries should be switched and placed on the team responsible for managing Access and Security, rather than induce added complications and onerous requirements upon residents seeking permissions. We would concur with this view. Experience informs us, that needless time can be taken up by demanding administrative tasks that disabled people are often having to navigate and that more often than not these administrative processes tend to fail to work as they should when it comes to disabled people’s needs and requirements. Moreover, not all disabled people will necessarily have the capacity nor energy to wade their way through these kinds of hurdle. It could also be said that life for some disabled people is already filled with enough complications and hurdles as it is.

We would therefore advise that a Service and enabling approach ought to be taken to arranging deliveries and obtaining any other permissions that may lift such burdens. We would also recommend that more diverse forms of deliveries ought to be permitted during the day to meet the needs of residents, especially those with accessibility related requirements. If it necessitated deliveries being delivered to a designated point and then delivered by members of the Access and Security team then this should form part of a Service driven approach. It may be that, if an electric shuttle service were made available, it could undertake such deliveries in addition to providing a shuttle service for people.

8.4. Accessibility Permits

Much of the public consultation respondents questioned the equity and appropriateness of excluding Blue Badge parking and raised similar questions regarding excluding access to taxis. From an equity perspective, we are minded to concur with this feedback and would be obligated to question reasonableness of this exclusion in the first instance. However, it is recognised that security concerns also need to be addressed.

Consequently, our Interim Report’s primary recommendation was, therefore, to explore a permit-based system. To be clear this wasn’t to give wholesale Blue Badge access but to permit access to permit holders on the grounds of accessibility in order to address both access and security concerns. The potential benefits could be two-fold:

- Offer a means by which security concerns could be addressed.
- Offer a means of preventing Blue Badge bay abuse through tighter controls since permit holders would be held to higher levels of accountability and the legitimacy of their presence could therefore be verified.
- Staff could then be given a two-fold remit that is one of Access and Security in equal measures, where their responsibility isn’t to exclude one at the expense of the other, so that a safe, positive User Experience of the City Centre Service can be achieved.

In order to achieve this, we therefore suggest that at security/access control points, a system of recognition using a combination of perhaps ANPR, permit scanning, facial recognition and staff presence to verify who is seeking entry at any given point.

We suggested that permitted access could be given to those who met particular criteria, such as:

- Holding evidence of their access requirements, such as a Blue Badge or evidence from a doctor that supports a person need for permit (so that those with injuries, awaiting surgery or not otherwise eligible for a Blue Badge can gain essential access – even for a limited period before the permit expires).
- Satisfying the security services that they don't present a likely threat.
- Either:
 - living within the proposed City Centre security area/zone or immediately outside it (such as those who currently have difficulty accessing bays that are regularly obstructed by others)
 - living within Bath and within a predetermined catchment/hinterland (such that Bath can reasonably be considered as their local city)
 - regularly working in the proposed City Centre security area/zone

We suggested that a permit system could:

- Extend to those organisations within the City Centre, Bath and its hinterland (such as Age UK or services to people with learning difficulties) with a clearly demonstrable service to a client group within which there is a high probability of requiring access within close reach of specific destinations.
- Be used in conjunction with an app so as to enable permit holders to signal to Access and Security staff that they wish to gain temporary access or be picked up by a taxi or private hire vehicle:
 - Details could be entered into such an app to permit access for a taxi or private hire vehicle for a limited period and only where the passenger holds a permit.
 - Taxi and private hire vehicles drivers, by virtue of their licencing ought to therefore offer Security Services an opportunity for vetting.
 - If needs be, taxi or private hire vehicle access could be limited to those with a corresponding permit of their own that can only be used in conjunction with an accessibility permit holder's permit.

Subject to the viability (for security purposes) of doing so, those visiting Bath on business or for enjoyment and wish to access a specific destination and have accessibility requirements could apply for short-term permits having satisfied both accessibility and security criteria and having had their vehicle checked on entry.

As indicated before, by providing more controlled access limited to those with legitimate access requirements, we suggested one would go some significant way towards addressing an existing concern regarding the misuse of Blue Badge bays by those with no legal reason for using them. This might have been seen as a significant improvement in accessibility terms.

Recommendations Following Stakeholder Engagement

The consistent feedback that we obtained from Stakeholder engagement was that Blue Badge holders ought to be provided access and that security protocols be devised around their use. The eligibility and administrative hurdles were seen as potentially being too much of a barrier to what many considered are legitimate and a necessary basis for access. Having heard the testimony of Stakeholder panellists, we would agree that an over-complicated permit system could be a problem. However, what is apparent, is that there would need to be some form of security protocols used by Access and Security Staff that

could easily link cars and taxis with Blue Badges holders, including occasions when taxi drivers have been asked to pick up a Blue Badge holder. Moreover, there are other vehicles such as those operated by social care service providers, health and social care workers, and “meals-on-wheels” providers and a service such as, or similar to, dial-a-ride services who ought to be permitted access on a basis other than occupants holding Blue Badges, or at the very least meeting agreed criteria for assistance.

8.5. Electric Shuttle

If the above proposals were not considered feasible, and if all options for making it work had been exhausted, then in our Interim Report we recommend exploring other alternatives that maintained a Service Design approach to the question of how the city delivers an inclusive and accessible Service. Indeed, during wider Public Consultations, some respondents suggested the idea of an electric shuttle service that included the car parks such as Charlotte Street would be a good idea.

However, it should be noted that any added complication to getting up, getting out and getting to a destination can become a significant hurdle. Getting out can often be a complicated and time-consuming logistical exercise for many, even before thinking about other “links in the access chain.” Added to this complication, there is uncertainty caused by delays, not knowing the arrangements and inclement weather.

Nevertheless, before dismissing this idea, we suggested that it was worth noting that this approach is not uncommon in large transportation domains such as major rail stations and airports where travel distances are known to be too great. It is also reported that Cardiff introduced an electric shuttle service. Even so, points to consider would be as follows:

- How would this effect the viability of Shopmobility and would it work in conjunction with Shopmobility and/or make a shuttle service less or even more viable?
- The Cardiff example utilized golf buggies and many transport domains examples don’t carry wheelchair users in their chairs and consequently it would be wise to explore options that utilized the electric version of the London Cab rather than offer a solution that did not include space for wheelchair users.
- Would an electric shuttle service function as a form of timetabled bus service or could they be called upon and/or even booked? This would need to be the subject of further evaluation.
- If this formed part of a Service Design and User Experience (UX) strategy for Bath, it might even be seen as a positive attraction and chargeable for use by those without Blue Badges or permits?
- It may be that if some form of electric shuttle service were provided that this might offer some solutions if there were an exchange point for particular deliveries that other residents might seek.

These are some of the questions that we suggested were best resolved through consulting stakeholders whilst also establishing what would be necessary in terms of business and service plans.

Recommendations Following Stakeholder Engagement

Whilst some of the Stakeholders could see benefits in having a shuttle system, there were a number of concerns raised with regards to the predicaments, uncertainties and added hassle factor that users could very easily face with a shuttle service. Whilst a shuttle service could be advantageous to some there was a consistent message that some Blue Badge holders

have need to stop in multiple locations and have need of getting to their cars and back home when energy levels, pain or other complications arising during their daily lives “kick-in”.

We were also able to consult one person with regards to the Shopmobility service. What became apparent is that it did not seem that it was located in the most appropriate location, some distance from where shops and services are located. It was also apparent that there are major hinderances to using mobility aids in Bath City Centre, such as uneven surfaces, a lack of dropped kerbs, narrow pavements, and obstructions such as A boards. It should also be noted that some people can’t make use of Shopmobility:

- where their visual impairment is such that they cannot see where they are going,
- where they have neither the strength nor control to operate mobility aids provided,
- where transfer to Shopmobility mobility aids is not physically possible.

There might be greater take-up in Shopmobility, if streetscape challenges were addressed and if Shopmobility located where the shops are and was closely associated with covered parking, where transfer between car and mobility aid could be made easier. Moreover, if there were drop-off and pick-up points in key car park locations, where the Shopmobility operator could arrange to meet-up with potential users when and where it is most advantageous to them, then this could also help. However, it is important to note that Shopmobility in of itself is not a total solution as needs and requirements vary and what is necessary is options and choices.

8.6. Improvements

It is very apparent that whether or not other mitigations are made available, improvements would be necessary to varying extent, according to the final decision made with regards the City Centre security area/zone. There would be a greater imperative to make urgent improvements if Blue Badge holders were not able to access the City Centre security area/zone. Nevertheless, if Blue Badge holders were provided with access other improvements would need to be considered as part of an overall and ongoing programme of improvement in order hat those without Blue Badges would benefit from improvements too. Consequently:

1. From a “mobility” narrative perspective we would recommend that:

- More Blue Badge bays and yellow-line parking capacity (subject to the Highway Authority’s assessment and approval) would be necessary. The necessary extent of increased parking provision will depend on the final option taken forwards. However, locations for consideration, include streets such as:
 - Beau Street
 - Broad Street
 - Barton Street
 - New Bond Street
 - Monmouth Street
- Where additional Blue Badge bays are provided, appropriate means of accessing the pedestrian surfaces, such as dropped kerbs, would need to be provided as well
- The relative number of Blue Badge bays and localities marked out by yellow lines outside the Security area/zone, Milson Street and Kingsmead Square,

would need to be assessed for additional capacity to not only address any loss of Blue Badge parking within these project areas but to also address loss of designated parking over preceding years.

- More Blue Badge bay allocations would need to be provided in off-street carparks, especially if access to the Blue Badge holders were restricted within the City Centre Security area/zone. Locations for consideration, include:
 - Broad Street Car Park,
 - Manvers Street Car Park
 - Kingsmead Square Car Park
 - Charlotte Street Car Park
 - Avon Street Car Park
 - Southgate Car Park
- It is recommended that owing to the challenges faced by disabled people, irrespective of any restrictions arising from proposals, that parking in council owned off-street parking is free for Blue Badge holders.
- The above measures pertaining to parking would be advisable even if Blue Badge holders were permitted to park within the City Centre security area/zone, since alternative and free Blue Badge parking locations would help alleviate problems that could occur if all the spaces within the security area/zone were taken up.
- Specific pick-up and drop-off locations outside the project areas for use by the general public would need to be explored and, where feasible, be provided at the soonest opportunity to account for those who wouldn't necessarily be eligible for Blue Badges but would benefit from being dropped off as close to destinations as possible.
- For similar reasons as above, taxi pick-up and drop-off locations outside the project areas would need to be revisited and improvements made, where feasible and at the earliest opportunity, in order that arrival/departure by taxi would be as optimal as possible in access terms.
- For similar reasons as above, existing bus stops would not only need to be retained but improved at the soonest opportunity, wherever physically feasible, in order that arrival/departure by bus would be as optimal as possible in access terms.
- Routes would need to be improved and addressed at the soonest opportunity to and from:
 - alternative off-street Blue Badge parking outside the project areas,
 - on-street Blue Badge bays outside the project areas and
 - permitted Blue Badge parking on yellow lines and outside the project areas (subject to the Highway Authority's assessment and approval)
- More seating will need to be provided at the soonest opportunity, in order that individuals might find somewhere to rest, provided that seating design follows inclusive ergonomic design guidance.
- Dropped kerbs are likely to be required, especially those near existing and proposed Blue Badge bays, or on key routes into the project areas from points of arrival.

- Improvement of wayfinding will be needed at the earliest opportunity to enable the facilitation of efficient navigation through the City Centre between points of arrival and destinations.
 - Other improvements identified within the 2015 access audit would need to be eventually addressed wherever feasible as part of a short to longer term plan as and when opportunities and funding became available.
2. From a “visual” and “tactile” realm perspective we would recommend:
- Attention be given to the “mobility” considerations access above, but with particular emphasis being given to addressing the following in and around parking and on routes to and from destinations, at the earliest opportunity:
 - Addressing visual clarity problems where they occur
 - Addressing tactile surface details where necessary
 - Addressing any lighting issues where necessary
 - That it will be necessary to impose limits on where cycles and e-scooters are permitted to go:
 - Limiting cycle and e-scooter access to designated routes only and
 - Policing illegal cycle and e-scooter access within pedestrian only areas
 - Working through the rest of the issues pertaining to peoples’ visual/tactile/lighting needs as identified in the 2015 access audit, over the medium to longer term, as and when opportunities arise.
 - Providing information that can be accessed by blind and partially sighted people with regards to limitations, changes and provisions
3. From a “auditory” realm and “alternative communication” perspective we would recommend:
- That, as with the needs of blind and partially sighted people, it will be necessary to impose limits on where cycles and e-scooters are permitted to go, from the perspective of Deaf and hard of hearing people:
 - Limiting cycle and e-scooter access to designated routes only and
 - Policing illegal cycle and e-scooter access within pedestrian only areas
 - Providing information that can be accessed by Deaf and hard of hearing people with regards to limitations, changes and provisions
4. From a “neurological” and “alternative communication” perspective we would recommend:
- Giving particular care to:
 - Not introducing paving patterns that would cause confusion or visual noise
 - Not introducing lighting that is known to give sensory/neurological processing issues
 - Locating, mapping and communicating quiet spaces and places where one can go if stressed, would be beneficial
 - Wayfinding improvements in order to facilitate navigation through the City Centre

- Providing information that can be easily understood, such as:
 - in Plain English,
 - translated into Easy-read
 - and communicated with Makaton symbols (and signing where appropriate)
5. From a “metabolic,” aka “convenience perspective” we would recommend that attention be given to:
- Existing public toilets and clarity as to their location and availability will be particularly important
 - Information with regards to the availability of toilets within City Centre premises such as shops, cafes etc., and whether they are wheelchair accessible or not, will be particularly beneficial and worth mapping and engaging owners of premises in supporting a positive experience of the City Centre

Information with regards to an adult changing places toilet facility will also be important

- Identifying gaps in toilet provision and addressing these within the medium term

8.7. Milsom Street

Our recommendations regarding Milsom Street are:

- Provide access for those with accessibility requirements via a Blue Badge holder permit system
- In conjunction with the above, rather than an ANPR monitored bus gate consider using a sliding bollard system similar to that provided for the security area/zone so as to provide one familiar system of access control within the city and prevent people following permit holders through in error
- If any electric shuttle service were in operation, then it should include Milsom Street
- Making improvements regarding Blue Badge parking in the locality. Such as:
 - Increasing Blue Badge parking provision within Broad Street Carpark.
 - Increasing Blue Badge provision in neighbouring streets to the South west side of Milsom Street
- Committing to making commensurate and progressive assessments and then improvements:
 - particularly those pertaining to tactile clarity between pedestrian only and pedestrian priority and vehicle accessible surfaces
 - other improvements identified in the 2015 access audit over the short, medium and longer term

8.8. Kingsmead Square

Our initial observations and thoughts, regarding Kingsmead Square, were going to be slightly different to the observations and thoughts given with regards to the Security area/zone and Milsom Street, but the more we have looked at this, the more we saw the need to apply similar principles to that of the Security area/zone. The reason is that Kingsmead Square is strategically located to enable access and drop of in conjunction with the Security area/zone.

Consequently, **if Blue Badge holders are not permitted to park within the City Centre security area/zone** our recommendations regarding Kingsmead Square are:

- Provide access to pass through but not park for those with accessibility requirements.
- In conjunction with the above, rather than a locked gate, consider using a sliding bollard system similar to that provided for the security area/zone so as to prevent misuse if it were reliant on an alternative ANPR. This would allow drop-off function and parking function for permit holders parking in New St and Avon Street leading to and from the square itself, but not permit parking within the square itself.

The reasoning for our recommendations is that it is apparent from stakeholder feedback, that Kingsmead Square locality acts as a strategic locality for some people getting to places like the theatre and parts of the centre area and consequently this would be of value in particular for Blue Badge holders. Moreover, the nearest off-street parking in Kingsmead Square Car Park is a reasonably significant level change from the Kingsmead Street branch of the Square's domain and one ought to allow for Blue Badge parking which offers more direct access to the Square.

Moreover, one would need to consider significantly improving Blue Badge parking capacity in the neighbouring Kingsmead Square Car Park and addressing the level change between the car park and the square and providing ramped access in addition to the current steps. Even then this doesn't necessarily address the effort that would need to be exerted to transition between these levels. The alternative might be to provide a lift, however unless lifts are enclosed within a building are supervised they can become a liability. For a lift to be provided it would need to be within a building domain with other activity, such as café in order that people, such as café staff could provide natural supervision of a lift.

If the improvements to access between the Kingsmead Square Car Park and Kingsmead Square were not undertaken, then this would place greater pressure on finding limited capacity within neighbouring streets for Blue Badge bay and yellow line capacity.

Irrespective of the selected option for the City Centre security area/zone we advise that commitment is given to making commensurate and progressive improvements. Particularly:

- those pertaining to evenness of surfaces and, tactile and visual clarity between pedestrian only and pedestrian priority and vehicle accessible surfaces.
- other improvements identified in the 2015 access audit over the short, medium and longer term.
- Improving access between the Kingsmead Square Car Park and the square and itself, from other directions as previously described under section 5.5

8.9. New Bond Street and Seven-Dials Junction

Whilst it sits outside Milsom Street, it is also apparent that New Bond Street sits between Milsom Street and the Security area/zone, it nevertheless lacks tactile delineation and ought to be reviewed. Our reasoning is that it sits between project areas and also sits on some strategic pedestrian/wheelchair access routes into the centre.

Furthermore, whilst it sits outside Kingsmead Square, it is also apparent, that Seven-Dials Junction is particularly hazardous and not working as it should:

- This is because it sits between Kingsmead Square and the Security Zone, there ought to be a conversation with regards how this might be addressed through traffic calming measures, a designated crossing point and a careful look at tactile delineators between pedestrian only and vehicle accessed surfaces. It should either be

considered as part of both or one of the projects or at the very least in relative quick succession to these projects.

- Our reasoning is that:
 - it sits between project areas and also sits on some strategic pedestrian/wheelchair access routes into the centre:
 - vehicular through-traffic does not apparently slow sufficiently for this area to work as intended.
 - whilst delineators are barely suitable for parallel travel by blind and partially sighted people they are not at all suitable for non-parallel travel as people can easily step over them and miss them.

8.10. Management and Communication

Whilst some of these recommendations have already been listed above, we would reiterate that in terms of enabling delivering on an accessible and inclusive Service driven outcome we would recommend:

- When appointing staff, that they are referred to as Access and Security staff and trained in matters of accessibility as well as security.
- Addressing issues identified during the 2015 access audit and pertaining to mobility access, over the medium to longer term, as and when opportunities arise.
- Implementing managerial provisions such as:
 - limiting cycle and e-scooter access to designated routes only
 - policing the prevention of illegal cycle and e-scooter access within pedestrian only areas
- Updating and implementing improvements to Wayfinding in order to facilitate navigation through the City Centre.
- Implementing an inclusive and accessible communication strategy in parallel with the implementation of all changes and Service driven outcomes.

END. (Please refer to the **Executive Summary** towards the beginning of this document for a summary)

Written by:

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For Bath and North East Somerset Council

Please direct all communications via:

Bath and North East Somerset Council

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Consultation Feedback Report

Bath City Centre Security Scheme

Proposed Permanent Access Restrictions Public Consultation 16 November 2020 – 31 January 2021

Final Version | 18 May 2021

**Bath & North East
Somerset Council**

Improving People's Lives

Contents

1. Executive Summary
2. Project Background
3. Consultation
 - 3.1 Consultation Period
 - 3.2 Publicity and Consultation
 - 3.3 Stakeholder Engagement
 - 3.4 Public Engagement
4. Methodology
 - 4.1 Consultation Material
 - 4.2 Ways to Respond
 - 4.3 Survey Questions
 - 4.4 Collation of Responses
5. Amount of Feedback
6. Overview of Feedback
 - 6.1 Survey
 - 6.2 Open email and letter responses
7. Full Record of Responses Received

Appendices

Appendix 1 Consultation Material

Appendix 2 Verbatim Survey Responses

Appendix 3 Verbatim Open Email and Letter Responses

1. Executive Summary

Introduction

- Between 16 November 2020 and 31 January 2021, Bath and North East Somerset Council held a public consultation to obtain feedback on draft proposals to provide additional security protection to people and property within Bath city centre’s most crowded public spaces.
- This is a report of the public consultation, including the process undertaken and a collation of comments made in response to the consultation. A verbatim record of all comments received during the consultation is available in Appendix 2 and 3.

Proposals were made following advice received from anti-terrorism police in response to the national threat from hostile vehicle terrorism.

The proposed scheme combines:

- Vehicle access restrictions within the city centre’s most crowded streets.
- Strengthened secure vehicle access points controlled/operated by the Council’s CCTV control room
- New purpose designed reinforced static and sliding protective bollards and furniture

Publicity and Communication

Consultation sought feedback from:

- People who live and work within, or visit the city centre.
- Business, cultural and service organisations which support the economy and wellbeing of the city.
- Organisations that help protect our heritage and ensure the city is inclusive and welcoming.

To alert target groups to the proposals and enable them to provide feedback, the Council undertook the following communications:

Stakeholder Notification

Notification letters were sent from the Leader of the Council to over 1000 residential and business addresses, identified as being within the proposed restricted zone.

Notification emails were sent to over 50 key stakeholders, identified as having a direct relationship with the city centre security scheme area or represent residents and organisations that visit and operate within it.

Publicity channels

- B&NES Media releases. 2 media releases sent.
- B&NES Website – Council Newsroom. Media releases made available on front page of Council website.
- B&NES Social Media channels (Twitter and Facebook) Regular posts throughout consultation period.
- B&NES weekly newsletter e-Connect.

Consultation Components

Due to COVID-19 restrictions there was no opportunity to hold face to face stakeholder or public events. The Council therefore provided online consultation material. This combined:

Dedicated B&NES Council Bath Security Project webpage (see [here](#)) containing:

- **Consultation Summary Brochure** 16 page document to help the reader identify the key points of the consultation. See Appendix 1.
- **Video presentation** Approx. 4 minute video to summarise key points of consultation, hosted on YouTube. See [here](#).
- **Questions and answers document** 2 page FAQs document providing answers to some key questions related to the proposed vehicle access restrictions. See Appendix 1.
- **Equalities Impact and Mitigation Statement** See Appendix 1.

Those without access to the internet were able to call the Council to request printed copies of the summary brochure and the survey.

Stakeholder Webinar

The Council invited city centre resident and business stakeholders (see below for details) to a presentation and question and answer webinar which was held on 25 November 2020. It was hosted by the Leader of Bath and North East Somerset Council, Cabinet Member for Transport, police representatives and senior council project managers. It was attended live by 25 people.

Feedback Summary

- A total of 522 responses were made to the consultation.
- The most comments received raised issues related to:
 - accessibility, particularly in relation to people with mobility impairments
 - the ability to receive deliveries within the proposed restricted zone
 - the impact on city centre businesses and residents and
 - the justification for the proposed security measures.

Next steps

In conjunction with the public consultation exercise, the Council has also commissioned an Accessibility Study into the City Centre Security proposals which has been carried out by a Consultant who is a Member of The National Register of Access Consultants.

The Council will review the comments contained in this Consultation report and the recommendations made within the Accessibility Study to determine any potential modifications or mitigations to the proposed scheme, and a decision on the advertisement of any Traffic Regulation Orders relating to the City Centre Security proposals will be made at the Council's Cabinet meeting on 23rd June 2021.

The advertisement and resolution of any Traffic Regulation Order (TRO) will then be carried out in accordance with the Council's decision-making process.

2. Project Background

2.1 Context

A key part of the Council's role is keeping the city's streets and spaces safe and secure, including protecting people and property from the threat of terrorism. Since 2016, the Council and Avon & Somerset Police have coordinated protection work designed to improve overall public safety and strengthen protection in areas of high footfall.

As the threat to the United Kingdom from terrorism remains, it is important that Bath & North East Somerset Council, with the help of its partners, continues to work hard to support the economy and community of Bath city centre. The Council has been working closely with the Police on plans to further strengthen city centre access restrictions and install new purpose-designed street furniture which will provide permanent enhanced safety for people in areas of high footfall.

The proposed improvements combine:

- Vehicle access restrictions within the city centre's most crowded streets
- Strengthened secure vehicle access points controlled / operated by the Council's CCTV control room
- New purpose designed reinforced static and sliding protective bollards and furniture.

2.2 Project Area

The area referred to within the consultation material is outlined in red on the plan below. Full details of the draft proposals consulted upon are available [here](#).

Below: City Centre Security scheme area



3. Consultation

3.1 Consultation Period

The public consultation was held between 16 November 2020 and 31 January 2021.

The consultation was initially scheduled to take place between 16 November 2020 and 15 January 2021. Due to the tightening of COVID-19 restrictions after Christmas 2020, the Council extended the consultation period to 11 weeks to allow respondents more time to submit comments.

3.2 Publicity and Communication

In order to shape the best possible city centre security scheme with input from residents, businesses, guardians and visitors to the city, the Council targeted communication and consultation opportunities to the following groups:

- People who live and work within, or visit the city centre
- Business, cultural and service organisations which support the economy and wellbeing of the city and
- Organisations that help protect our heritage and ensure the city is inclusive and welcoming.

3.3 Stakeholder Engagement

The Council identified a list of Key stakeholders from which to seek feedback as part of the public consultation. These were people and organisations that had a direct relationship with the city centre security scheme area or represented residents and organisations that visit and operate within it.

The Council contacted these stakeholders directly using email to point them to the online consultation and to request that they share the consultation with their members or other interested parties.

Table 1 is an overview of the identified stakeholders, engagement activities undertaken and amount of engagement over the consultation period.

Table 1 (below) – Stakeholder Engagement and Publicity Overview

Stakeholder	Activity	Engagement Statistics
<p>Key External Stakeholders</p> <p>Including:</p> <ul style="list-style-type: none"> • directly affected businesses, tourist attractions and residents (those within the proposed restricted zone) • business and trader groups • heritage groups • transport groups • resident associations • waste operators • emergency services • Active Travel and Accessibility Forum (ATAF) • Independent Equalities Advisory Group (IEAG) 	<p>Notification letter/email sent, including:</p> <ul style="list-style-type: none"> • Short summary information • Link to webpage - where they could see exhibition boards, interactive map, protocols, FAQs, ways to feedback, • Invitation to register for a Webinar session <p>60-minute Webinar Session - Presentation of proposals, including:</p> <ul style="list-style-type: none"> • Short film, narrated with visuals, on-street footage • Q&A session with answers from B&NES project officers / ward members / police • Link to feedback webpage <p>The session was recorded so it could be watched by those who missed it live.</p>	<ul style="list-style-type: none"> • 970 letters sent via Royal Mail (623 commercial addresses, 347 residential address) • 55 emails sent to key stakeholders <ul style="list-style-type: none"> • 25 attendees at live webinar on 25 November 2020. • 66 views of webinar recording on B&NES YouTube channel <p>Short film viewed 520 times on B&NES YouTube channel</p>

Stakeholder	Activity	Engagement Statistics
<p>Public</p>	<p>Public notification of consultation and informing public of the proposals, including via:</p> <ul style="list-style-type: none"> • Media release • B&NES Website – Council Newsroom • Social Media channels (Twitter and Facebook) <p>Each included access to the consultation information on the Council’s website and a link to the feedback page.</p>	<ul style="list-style-type: none"> • 570 (529 unique) views of Newsroom post: https://newsroom.bathnes.gov.uk/news/ha-ve-your-say-security-proposals-bath-city-centre • 270 (248 unique) views of Newsroom post: https://newsroom.bathnes.gov.uk/news/bath-city-centre-security-consultation-extended • 2919 (2307 unique) views of Council Consultation page: www.bathnes.gov.uk/citycentresecurityconsultation • 1257 (1097 unique) views of Council Project webpage: www.bathnes.gov.uk/citycentresecurity • 4 x Twitter posts: 8133 Impressions (times people saw a tweet); 295 Engagements (time people interacted with a tweet) • 2 x Facebook posts: 1555 Impressions; 74 engagements

Table 1 (above) – Stakeholder Engagement and Publicity Overview

3.4 Public Engagement

In addition to contacting identified city centre stakeholders, the Council publicised the scheme and consultation to inform and invite feedback from all sections of B&NES community and from people and organisations outside of the authority.

To do this the Council utilised the following publicity channels:

- B&NES Media releases. 2 media releases sent.
- B&NES Website – Council Newsroom. Media releases made available on front page of Council website.
- B&NES Social Media channels (Twitter and Facebook) Regular posts throughout consultation period.
- B&NES weekly newsletter e-Connect.

4. Methodology

4.1 Consultation Material

The Council made the following consultation material available:

- **Consultation Summary Brochure** 16 page document to help the reader identify the key points of the consultation. See Appendix 1.
- **Video presentation** Approx. 4 minute video to summarise key points of consultation, hosted on YouTube. See [here](#).
- **Questions and answers document** 2 page FAQs document providing answers to some key questions related to the proposed vehicle access restrictions. See Appendix 1.
- **Equalities Impact and Mitigation Statement** See Appendix 1.

All of the material was available online on the Council's website (see [here](#)).

Those without access to the internet were able to call the Council to request printed copies of the consultation summary brochure (and survey, see 4.2 below).

4.2 Ways to Respond

The principle method of response was via the online survey which went live on 16 November 2020 and closed on 31 January 2021. Survey Monkey was chosen as the most appropriate platform for this, due to its user-friendly interface and ease of use. The same survey was available to all participants. The survey was accessible via the Council's dedicated [consultation webpage](#). The Council set up the online survey so that it would only accept one response per IP address.

Those without access to the internet could call the Council to request printed copies of the survey (and consultation summary brochure, see 4.1 above). The printed survey was the same as the online survey described above. Completed printed surveys could then be posted to the dedicated team at the Council.

Respondents were also able to email the Council via a dedicated email address, and post letters/completed print survey to the dedicated consultation team, with any questions or comments that could not be expressed within the survey.

It should be noted that the respondents were self-selecting and as a result any conclusions made cannot be as representative as a random sample would be.

4.3 Survey Questions

See Appendix 1 for a full, clean copy of the survey. The survey had 12 questions in total and was broadly split into 7 parts structured around the following:

- About city centre security priority from hostile vehicles
- About the protected streets
- About proposed daytime security access restrictions
- About proposed night time limited vehicle access
- About access and mobility
- Additional comments
- About the respondent

The survey included closed questions as well as open questions allowing freeform text responses allowing respondents to be clear and specific about their views.

4.4 Collation of Responses

Responses to the consultation were received via the survey and open email and letters sent to the Council.

Online and paper responses to the survey have been combined. Survey Monkey creates charts and tables that display a summary of responses to the closed questions. This functionality was utilised for these questions and is included in Section 6 of this report. The full spreadsheet of verbatim survey responses, which includes full responses to the open questions, is included at Appendix 2.

Open email and letter responses were transcribed into a spreadsheet and their content broadly organised into the survey categories. This is in order to protect respondents' anonymity and to prepare the data for analysis. The spreadsheet includes the categorised verbatim responses and is included at Appendix 3.

The open survey questions allowed freeform responses. The responses were read in full and categorised as per their content. The analysis process was fluid; there was no limit to the number of categories, and categories were created according to the content of the responses. Splitting the responses into categories allowed the identification of common viewpoints.

Section 6.1 of this report includes an overview of the categories identified, and, for survey Questions 3, 5, 7 and 8, information on how many responses fell within each category. Due to the nature of freeform responses, some comments fell into more than one category.

[Q3. Was a freeform response to Q2 *'Do you agree with the streets proposed to be included in the protected area?'* 'If No, please provide any comments or suggestions']

[Q5. Was a freeform response to Q4 *'Do you agree with the limits on the use of the streets between 10am and 6pm?'* 'If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?']

[Q7. Was a freeform response to Q6 *'Do you agree with the limits on the use of the streets between 6pm and 10am?'* 'If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?']

[Q8. Was a freeform response to *'Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders'*

Question 9 of the survey, and all of the open email and letter responses were analysed using a similar categorical process. However, due to the particularly open nature of these responses, this report does not include information about how many comments fell within each category. Instead, it provides a summary of the categories to provide an overview of comments made. See Section 6.1 Question 9 Additional Comments, and Section 6.2 below.

[Q9. 'Please provide any other comments or suggestions below']

If it was not clear what was meant by a response, no assumptions have been made about the meaning of the comment where it was not explicit.

The final section of the survey asked respondents about their relationship with the scheme to enable the council to identify views of city centre businesses / bath residents / people who live outside of Bath.

Please note that Section 6 of this report is a collation of the consultation responses and does not go into detail of each response made. A full verbatim record of responses made is available in the Appendix.

5. Amount of Feedback

A total of 522 responses were received to the consultation.

484 responses were made via the Survey, 483 of which were made online, and 1 paper copy. See Appendix 2.

38 open letter / email responses were received. See Appendix 3.

6. Overview of Feedback

This section includes:

- An overview of the comments made in response to the survey
- an overview of comments made in the open email and letter responses

6.1 Survey

Over the following pages, an overview of responses made are displayed in the same order as the survey.

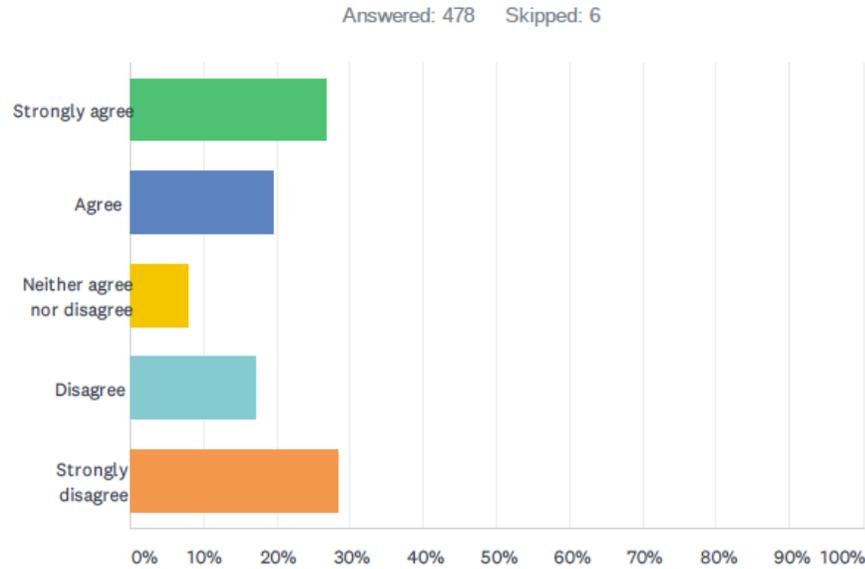
Specific question wording is shown at the top of the page, as well as a summary of the number of respondents that answered the question and the number of respondents that skipped it.

Survey Monkey charts and tables are included as summaries of the responses to the closed questions.

For each of the open questions, a collation of the comments made in the responses is included, produced using the categorical methods outlined in Section 4.4.

Verbatim survey responses are available at Appendix 2.

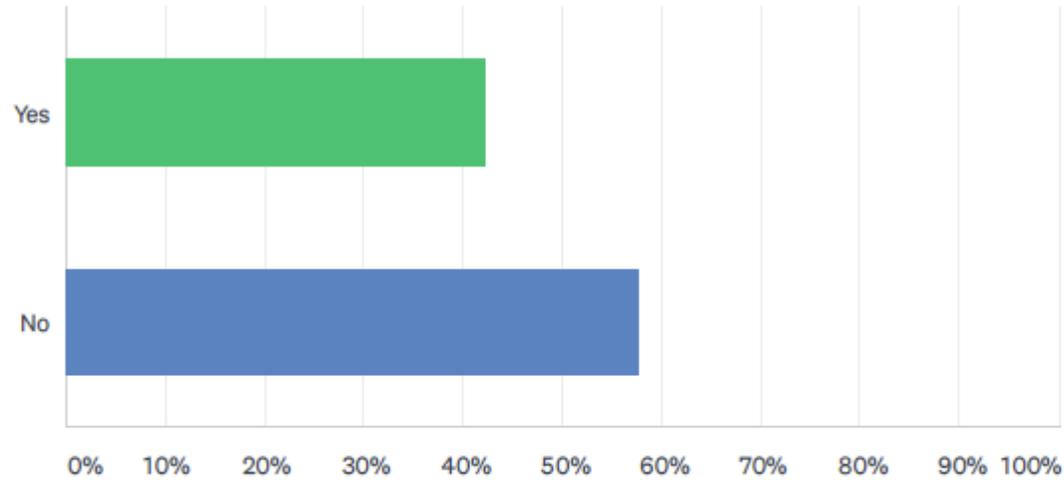
Question 1. Vehicle access restrictions in the city centre’s most crowded streets should be used to protect people from hostile vehicles.



ANSWER CHOICES	RESPONSES	
Strongly agree	26.78%	128
Agree	19.67%	94
Neither agree nor disagree	7.95%	38
Disagree	17.15%	82
Strongly disagree	28.45%	136
TOTAL		478

Question 2. Do you agree with the streets proposed to be included in the protected area?

Answered: 450 Skipped: 34



ANSWER CHOICES	RESPONSES	
Yes	42.22%	190
No	57.78%	260
TOTAL		450

Question 3. If No, please provide any comments or suggestions

Answered: 227 Skipped: 257

Comments were made in relation to the following categories. It should be noted that the categories below were identified to group and aid the analysis of the responses; they do not go into detail of each comment. Some comments fell into more than one category. Numbers given are approximate.

- Approx. 54 comments related specifically to concerns arising from the proposals over access to and within the city centre for already **vulnerable groups** e.g. blue badge holders, those with mobility issues, autistic/learning disabled people, non-sighted people
- Approx. 52 comments questioned the **justification for the proposals**, stating that the risk from terrorism was lower than stated in the consultation material and/or that the proposals would not stop another type of terrorist attack if there were one
- Approx. 41 comments related to the negative impact of the proposals on **businesses within and around city centre** due to difficulty with deliveries, reduced custom, practicalities of business etc.
- 28 comments related to the negative impact of the proposals on the lives of **city centre residents** due to restrictions on access, parking, deliveries etc
- Approx. 25 comments related to the **proposals being disproportionate**; a better balance needed between risk from terrorism and access needs
- Approx. 13 comments related to the risk from terrorism being an **excuse to pedestrianise** / ban cars from the city centre
- Approx. 11 comments related specifically to the proposals causing **difficulty for people coming into the city centre** (e.g. residents, tourists) to access facilities and services
- Approx. 8 comments related to **accepting the principle** of restricting traffic in the city centre

- Approx. 8 comments related to the notion that the **roads should be left as they are**
- Approx. 5 comments related to wanting to see **more streets being included** in proposals for pedestrianisation
- Approx. 5 comments related to the notion that **everyday life and behaviour should not change** because of the risk from terrorism
- Approx. 4 comments related to concerns that the **character and community** of the city centre would be negatively altered by the proposals
- Approx. 4 comments related to the notion that many **other streets / areas are more crowded** than those in the proposed restricted zone
- Approx. 3 comments related to suggestions that the proposals only be enforced at certain times when the city centre is most crowded e.g. Christmas Market; **not all year**
- Approx. 3 comments related to the proposals **prioritising tourists over locals**
- Approx. 3 comments related concerns that progress on this project should not be happening during the **COVID-19 pandemic**
- Approx. 3 comments related to the **structure of the questionnaire** limiting the responses possible

Categories with approx. 2 related comments:

- Concerns over emergency access in the city centre
- Negative impact on surrounding streets
- The proposals restrict peoples' freedom
- More police needed on the streets instead of the proposals
- There should be fewer permanent bollards
- There is already insufficient parking provision in the city centre

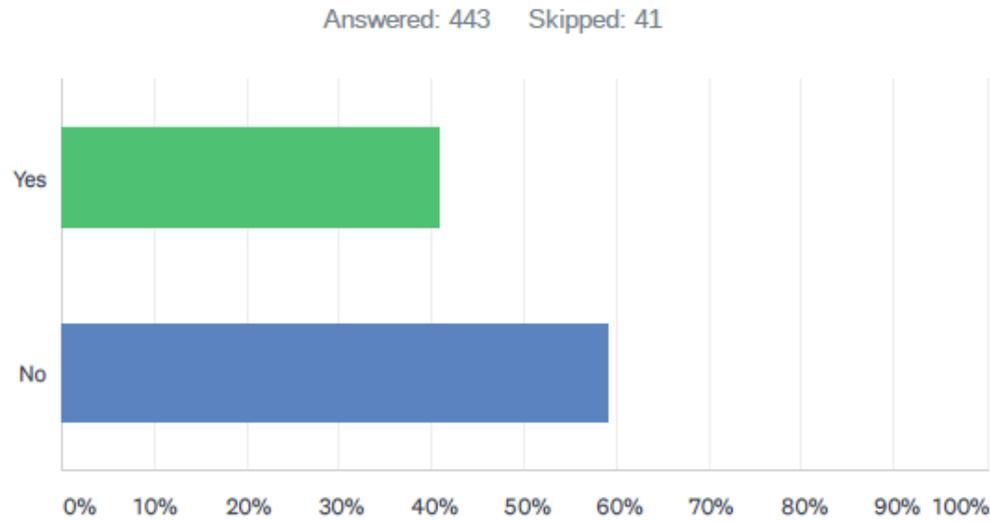
Categories with approx. 1 related comment:

- There needs to be more and easier vehicular access in the city centre
- There is no need for permanent bollards on Cheap St / Westgate St

Proposed Scheme Details

<p>Suggestions for streets / areas to be excluded from restricted zone (approx. number of comments)</p>	<p>Suggestions for streets / areas to be included in restricted zone (approx. number of comments)</p>
<ul style="list-style-type: none"> - Westgate Street (4) - Lower Borough Walls (3) - Upper Borough Walls (2) - Orchard St (2) - Full length of York St is not necessary; barriers should be installed just to the East of Kingston Parade/Church St (2) - Abbey Gate St (1) - Swallow St (1) - York St (1) - Cheap Street (1) 	<ul style="list-style-type: none"> - Westgate Street (2) - Protection needed at intersection of Milsom St and Old Bond / Burton St. 1 - Westgate Buildings (1) - George St (2) - Queen Square (1) - Milsom Street (2) - Manvers Street (1) - Dorchester Street (1) - Stall St (1) - Guildhall / Waitrose area (1) - Royal Crescent / Circus (1) - High Street (1) - South entrance to Southgate St (1) - Bridge St & Pulteney Bridge (1) - Access from John St to Wood St (1) - Kingsmead Square (1)

Question 4. Do you agree with the limits on the use of streets between 10am and 6pm?



ANSWER CHOICES	RESPONSES	
Yes	40.86%	181
No	59.14%	262
TOTAL		443

Question 5. If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?

Answered: 226 Skipped: 258

Comments were made in relation to the following categories. It should be noted that the categories below were identified to group and aid the analysis of the responses; they do not go into detail of each comment. Some comments fell into more than one category. Numbers given are approximate.

- Approx. 63 comments related specifically to concerns over access to and within the city centre for already **vulnerable groups** e.g. blue badge holders, disabled people, or those with mental health issues, and or to the suggestion that **blue badge holders should be allowed** within restricted zone
- Approx. 33 comments related to the proposals negatively **restricting access for deliveries**, and/or the suggestion that delivery drivers should be allowed within the restricted zone
- Approx. 33 comments related to the negative impact of the proposals on **businesses that operate within the city centre** / particularly within context of the **COVID-19 pandemic**
- Approx. 30 comments related to the negative impact of the proposals on the lives of **city centre residents** due to restrictions on access affecting deliveries, tradespeople working etc. and/or the suggestion that residents' vehicles should be allowed within restricted zone
- Approx. 25 comments questioned the **justification for the proposals**, stating that the risk from terrorism was lower than stated in the consultation material and/or that the proposals would not stop another type of terrorist attack if there were one
- Approx. 20 comments related to the notion that **the roads should be left as they are**
- Approx. 15 comments related to the negative impact of the proposals on **taxi services**, and/or to the suggestion that taxis should be allowed within all or part of the restricted zone

- Approx. 13 comments related to the risk from terrorism being an **excuse to pedestrianise** / ban cars from the city centre
- Approx. 12 comments related to broadly **accepting the proposed restriction** times
- Approx. 10 comments related to the **proposals being disproportionate** to the threat from terrorism and the actual number of people on streets
- Approx. 8 comments related to suggesting **more police** on street or a new police station instead of the proposals
- Approx. 7 comments related to wanting to see **more traffic restriction**
- Approx. 7 comments related to the suggestion of **controlled access for licenced vehicles** e.g. permits, CCTV, number plate recognition, code for businesses and customers
- Approx. 7 comments related to the proposals causing difficulty specifically for **people to access day time** city centre services e.g. theatre matinees, religious services, shopping, banking, restaurants
- Approx. 5 Comments related to the **need for more consultation and research** to be undertaken before progressing

Categories with approx. 2 related comments:

- Concerns over emergency access in the city centre caused by the proposals
- Negative impact on people trying to travel through Bath

Categories with approx. 1 related comment:

- The proposals restrict peoples' freedom
- The proposals prioritise visitors over locals
- Consultation material does not show the full extent of (disabled) parking spaces lost
- The pedestrianisation of city centre roads during 2020 made for a pleasant atmosphere

Proposed Scheme Details (approx. number of comments)

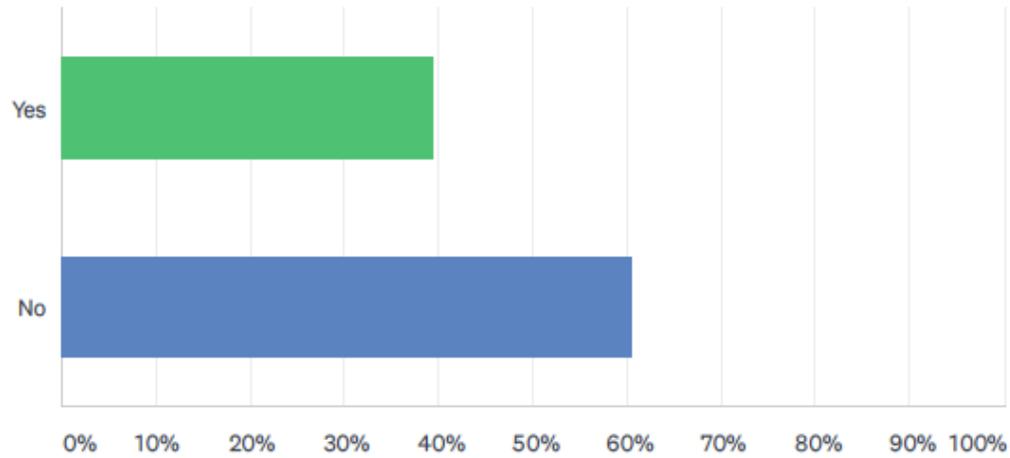
- New or additional loading bays could be provided on Westgate Buildings, Monmouth St or New Bond St (1)
- Restrict 'general car parking' but allow access for all other categories at all times (1)
- Buses should be allowed in restricted zone (3)
- Public transport into the city centre must be adequate and frequent (1)
- Access restrictions should include those on electric bikes and scooters (1)
- Services in the city centre could remain accessible perhaps 1 day a week or within a daily time period 1
- Bollards should be located on pavements instead 1
- There are not many vehicles on Westgate St (1)
- Cyclists should cycle more slowly / walk with bikes in restricted areas (2)
- There needs to be access to the Abbey for hearses / wedding cars (1)
- There should be less street furniture (1)

Proposed restriction times

- start at 8am (1)
- start at 9am (2)
- End at 5pm (1)
- End at 6pm (1)
- Extend past 6pm (1)
- Should be 9am-10pm (1)
- Should be 11am-4pm (1)
- Should be 10am-10pm along Westgate and Saw Close (1)
- 24 hour restrictions needed in high risk areas (2)

Question 6. Do you agree on the limits on the use of the streets between 6pm and 10am?

Answered: 433 Skipped: 51



ANSWER CHOICES	RESPONSES	
Yes	39.49%	171
No	60.51%	262
TOTAL		433

Question 7: If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?

Answered: 203 Skipped: 281

Comments were made in relation to the following categories. It should be noted that the categories below were identified to group and aid the analysis of the responses; they do not go into detail of each comment. Some comments fell into more than one category. Numbers given are approximate.

- Approx. 44 comments related specifically to concerns over access to and within the city centre for already **vulnerable groups** e.g. blue badge holders, disabled people, those with mental health issues an/or the suggestion that blue badge holders should be allowed within restricted zone
- Approx. 37 comments related to the proposals negatively **restricting access for deliveries**, and/or the suggestion that delivery drivers should be allowed within the restricted zone
- Approx. 35 comments related to the negative impact of the proposals on **businesses, including those that contribute to the night time economy**, that operate within the city centre
- Approx. 21 comments related to the notion that the **roads should be left as they are**
- Approx. 19 comments related to the negative impact of the proposals on the lives of **city centre residents** due to restrictions on access affecting parking, tradespeople working, disruption caused by night time deliveries etc., and/or the suggestion that residents' vehicles should be allowed in the restricted zone
- Approx. 18 comments questioned the **justification for the proposals**, stating that the risk from terrorism was lower than stated in the consultation material and/or that the proposals would not stop another type of terrorist attack if there were one
- Approx. 17 comments related to the **proposals being disproportionate** to risk from terrorism in Bath and the number of people actually on the streets / especially during the evenings

- Approx. 11 comments related to the **negative impact on taxi services** arising from the proposals and/or the suggestion that taxis should be allowed within all or part of the restricted zone
- Approx. 8 comments related to the risk from terrorism being an **excuse to pedestrianise** / ban cars from the city centre
- Approx. 5 comments related specifically to the proposals causing difficulty for **people coming into the city centre** (e.g. residents, tourists) to access evening facilities and services
- Approx. 4 comments related to **broadly accepting** the proposed times of restriction
- Approx. 4 comments related to concerns that related problems / threats will get pushed to city centre outskirts or the surrounding area
- Approx. 4 comments related to suggesting more police and/or security on the streets instead of proposals

Categories with approx. 3 related comments:

- The proposals restrict people's lives / freedom
- Vehicular access should be allowed for special events
- More streets and/or 24hr restrictions should be proposed
- Controlled access for licenced vehicles e.g. permits, CCTV, number plate recognition, code for businesses and customers

Categories with approx. 2 related comments:

- Proposals that limit cars in the city centre are positive
- The streets will be more dangerous at night for those who have to walk from venues to get a taxi

Categories with approx. 1 related comment:

- Concern over emergency access in the city centre caused by the proposals

- Existing barriers are difficult to navigate for cyclists
- Buses should be allowed in the restricted zone
- There should be less street furniture
- There needs to be more consultation / research / consideration before the scheme progresses
- The proposals create an atmosphere of fear and exclusion

Suggestions for proposed time period (approx. number of comments)

- Wrong time period proposed (2)
- Restrictions should start at 6 or 7am (1)
- Restrictions should start at 7.30am
- Restrictions should start at 8am (1)
- Restrictions should start at 9am (1)
- Restrictions should be between 9am and 6pm (2)
- Restrictions should be between 11am and 5pm (1)
- Restrictions should be between 10am and 10pm (1)
- Consider restrictions to extend until 12am around Saw Close (1)

Question 8. Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for 'blue badge' holders

Answered: 261 Skipped 223

Comments were made in relation to the following categories. It should be noted that the categories below were identified to group and aid the analysis of the responses; they do not go into detail of each comment. Some comments fell into more than one category. Numbers given are approximate.

- Approx. 101 comments related to the notion that the proposals exclude those in already vulnerable groups, and/or the suggestion that **disabled people should be allowed into the restricted zone** to park near to the destinations that they want or need to visit. (See below for specific streets suggested)
- Approx. 29 comments related to **withdrawing the proposals** and/or there is no need for the proposals
- Approx. 21 comments related to the need for **further information and consultation** before any progress on the scheme
- Approx. 18 comments related to the need to **consider other disabilities**; not just those with blue badges and/or to consider that not all those with mobility issues use mobility scooters
- Approx. 17 comments related to the suggestion of **controlled access for licenced vehicles** (e.g. through permits, CCTV, number plate recognition) to allow for blue badge holders, deliveries, residents, taxis etc in the restricted zone
- Approx. 15 comments related to the suggestion of providing **more, free and non time-restricted disabled city centre parking** (e.g. in Broad St car park (approx. 4 comments) and Southgate car park (approx. 2 comments))
- Approx. 12 comments related to the negative impact of the proposals on **city centre businesses**
- Approx. 9 comments related to providing **alternative / improved ways for people to travel around the city** e.g. tram network, better park and ride services, better links to surrounding road network

- Approx. 8 comments related to providing city centre residents with **more, free city centre parking**
- Approx. 6 comments related to ensuring that **clear cycle / pedestrian management** needed within and around restricted zone
- Approx. 5 comments related to the suggestion of providing a **shuttle service** for disabled people
- Approx. 5 comments related to the suggestion of providing **pick-up and drop off spaces** near businesses and/or at the edge of the restricted zone
- Approx. 5 comments related to broadly **supporting the proposals** to pedestrianise city centre streets
- Approx. 4 comments related to the suggestion of providing **mobility scooters for hire**
- Approx. 4 comments related to the need for **stricter enforcement** of proper use of disabled parking spaces around the city centre
- Approx. 4 comments related to the need to ensure the design and location of street furniture is safe for all and fits into the historic context of Bath

Categories with approx. 3 related comments:

- Provide more disabled parking spaces on the edge of restricted zone

Categories with approx. 2 related comments:

- Provide more cycle, motorcycle, and EV parking spaces in restricted zone
- Provide dropped kerbs and ramp access to wheelchair enabled spaces
- Reduce the size of the restricted zone to only cover the most busy parts

Categories with approx. 1 related comment:

- Move the post office to more accessible place

- Provide more parking for everyone
- Stop the war against cars

Suggestions for where access for blue badge parking is needed

- New Bond St
- Trim St
- Barton St
- Monmouth St,
- George St
- Gay St
- Bond St
- Orange Grove
- around Guildhall
- Henry St
- South Parade
- Milsom St
- St James

Question 9. Please provide any other comments or suggestions below

Answered: 263

Skipped: 221

Comments were made in relation to the following categories. Due to the particularly open nature of these responses, the following does not include information about how many comments fell within each category. Instead, it provides a summary of the categories to provide an overview of comments made.

- **Rational behind the proposals.** Comments made in relation to:
 - The proposals being an excuse to progress a car-free city centre agenda
 - The proposals being disproportionate to the terrorist threat level in Bath; more evidence needed
 - Inefficacy of the proposals to stop other forms of terrorist attack (e.g. attacks made by single pedestrians rather than those in hostile vehicles)
 - Other more important things for the Council to spend money on e.g. public toilets
 - Supporting the scheme
 - Not supporting the scheme

- **Controlled access to restricted zone.** Comments made in relation to:
 - City centre residents, blue badge holders, licenced businesses (e.g. delivery drivers, tradespeople, maintenance vehicles, taxis), and identified other stakeholders should have access to the restricted zone to drive through and to park.
 - Well managed CCTV / number plate recognition / permits etc could be a way to manage this

- **Consultation and Scheme Development Process.** Comments made in relation to:
 - Inappropriate timing of consultation during pandemic. Lack of publicity.
 - More research and consultation with relevant stakeholders being needed.
 - The format of the questionnaire; leading questions
 - The information in the consultation material; more/less detail needed
 - Inappropriate timing of scheme development during pandemic
 - Concerns that comments won't be listened to

- **Impact on city centre economy.** Comments made in relation to:
 - Economic concerns; the city centre will be less accessible to residents and tourists and so less money will be spent on local businesses.
 - Concerns over practicalities for businesses that operate within the city centre including shops/restaurants/businesses, taxi firms, delivery drivers

- **Impact on city centre residents.** Comments made in relation to:
 - Concerns over impact on city centre residents

- **Accessibility and Mobility.** Comments made in relation to:
 - Concerns over access to and within the proposed restricted zone for vulnerable groups who already face accessibility problems.
 - The proposals would prevent many disabled people from being able to access essential and valued city centre facilities and services (e.g. pharmacies, opticians, post office, theatre, other shops).
 - The proposals would curtail independence of many disabled people
 - The proposals should not include the removal of disabled parking spaces.
 - (Disabled) Parking provision in the area is already inadequate.
 - Better enforcement of existing disabled parking restrictions is needed
 - More, free disabled parking should be provided

- **Public realm and street furniture.** Comments made in relation to:
 - New street furniture should be attractive and inkeeping with the World Heritage Site context of the city
 - There should be new attractive paving to aid pedestrianisation

- **Cycling infrastructure.** Comments made in relation to:
 - There should be better management of pedestrians and cyclists within the shared space
 - CCTV monitored bike racks should be installed
 - Bikes and scooters should be banned from the restricted zone

- **Alternative ways to address risk from terrorism in Bath.** Comments made in relation to:
 - More police on street instead of the proposals

- Train business owners to look out for terrorist threats
- Better public transport needed instead e.g. buses and park and ride

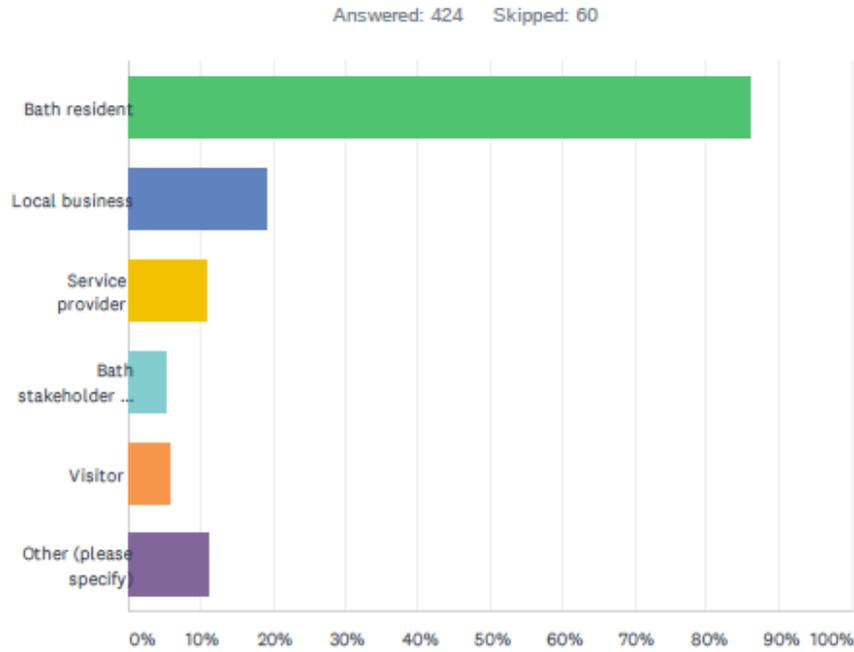
- **Proposed scheme details.** Comments made in relation to:

- Parking / driving restrictions should be wider. Specifically:
 - Further restrictions needed on George St, southern entrance of South St, Manvers St, Dorchester St, Kingsmead Square, Westgate Buildings, Milsom St, footway that connects Terrace Walk and Abbey Green
 - Restricted zone should go on later into the night
- How will the scheme be managed and reviewed in the future?
- How does the existing coach drop-off area fit into the proposals?
- How does Queens Square fit in to this?
- The Christmas Market should not be an exception within the restricted zone

- **Other**

- Bus gates should be removed
- Need to consider the impact of the proposals on the surrounding area

Question 10. What is your interest in the City Centre Security scheme (please select all that apply)



ANSWER CHOICES	RESPONSES	
Bath resident	86.08%	365
Local business	19.10%	81
Service provider	10.85%	46
Bath stakeholder / Community organisation	5.19%	22
Visitor	5.90%	25
Other (please specify)	11.08%	47
Total Respondents: 424		

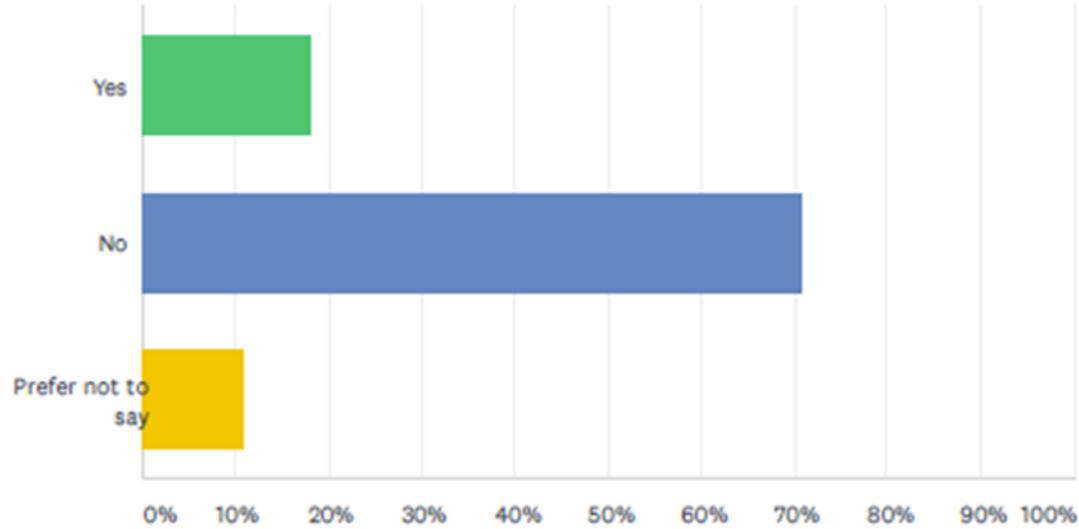
Question 11. What is your postcode?

Answered: 398 Skipped: 86

Responses have been redacted in Appendix 2

Question 12. Do you consider yourself to have a disability?

Answered: 420 Skipped: 64



ANSWER CHOICES	RESPONSES	
Yes	18.10%	76
No	70.95%	298
Prefer not to say	10.95%	46
TOTAL		420

6.2 Open Letter and Email Responses

Comments were made in relation to the following categories. Due to the particularly open nature of these responses, the following does not include information about how many comments fell within each category. Instead, it provides a summary of the categories to provide an overview of comments made.

Verbatim open letter and email responses, categorised as outlined in ‘Collation of Responses’ above, are available at Appendix 3

- **Rational behind the proposals.** Comments made in relation to:
 - Insignificance of the threat from terrorism in Bath
 - Inefficacy of the proposals; what about threats from other forms of terrorist attack (e.g. attacks made by single pedestrians rather than those in hostile vehicles)?
 - The proposals being an excuse to progress a car-free city centre agenda.
 - Supporting the need to increase city centre security
 - Supporting the proposals.

- **Negative impact on city centre businesses.** Comments made in relation to:
 - Economic concerns; the city centre will be less accessible to residents and tourists and so less money will be spent on local businesses.
 - Concern over restrictions to deliveries to businesses in the proposed restricted areas. Many businesses depend on road freight and deliveries need to be done during daytime working hours.
 - Increased barriers to local tradespeople undertaking work in the proposed restricted area.

- **Negative impact on city centre residents.** Comments made in relation to:
 - Concerns over access for emergency works e.g. utility services, plumbers, electricians etc.
 - Concerns over practicalities of managing courier deliveries and essential service provision (e.g. NHS carers, cleaners etc) to city centre residents

- **Accessibility and Mobility.** Comments made in relation to:
 - Concerns over access to the proposed restricted zone for vulnerable groups who already face accessibility problems.

- The proposals would prevent many disabled people from being able to access essential and valued city centre facilities and services (e.g. pharmacies, opticians, post office, theatre, other shops).
 - The proposals would curtail independence of many disabled people who currently drive into and/or park in the proposed restricted area in order to visit the city centre.
 - The proposals should not include the removal of disabled parking spaces.
 - (Disabled) Parking provision in the area is already inadequate.
- **Consultation Process.** Comments made in relation to:
 - Concerns that the consultation should not be happening during the pandemic when many people are shielding / staying at home.
 - More consultation with relevant stakeholders, including more disabled people, needs to be undertaken
- **Proposed Scheme Details.** Suggestions on the proposals:
 - Consider additional security measures on John's Street and nearby bars, High Street and Guild Hall, Kingsmead Square, Milsom Street and Green Street
 - Restrict motorcycle access
 - Restrict vehicular access but still provide disabled parking access in proposed restricted zone e.g. on Westgate Buildings or Kingsmead Square
 - Ensure that location of proposed bollards allows for easy boarding and alighting of all buses
 - Ensure that proposed street furniture is inkeeping with Bath's UNESCO World Heritage status and historic character
 - Allow city centre residents vehicular access to the proposed restricted zone
 - Include electric vehicle charging points
 - Consider proposals to increase blue badge holder parking (see Appendix 3 for detail)
 - Consider practicalities for redevelopment of former Mineral Hospital
 - Consider practicalities for access to the Abbey for special events e.g. weddings, funerals.

7. Full record of Responses Received

Please note that this report is an overview of the consultation, and categorises the consultation responses in order to present an overview of the comments.

Please see Appendix 2 and 3 for a full verbatim record of the responses received during the consultation.

Appendix 1 Consultation Material

Please see overleaf

Bath City Centre Security

Proposed Permanent Access Restrictions

Public consultation



**Bath & North East
Somerset Council**

Improving People's Lives

Contents

INTRODUCTION	3
About this document	
A coordinated package of improvements	
Three key investments for 2021	
CONTEXT & OBJECTIVES	6
Bath security today	
Prevention and protection from hostile vehicles	
Improving and strengthening city centre security	
PROPOSED CITY CENTRE IMPROVEMENTS SCHEME	8
Guiding principles	
Summary	
Area and streets covered	
Restricted access periods	
Access restriction exemptions	
Providing alternative parking and drop off facilities	
DELIVERING THE SCHEME	13
Tools to deliver the scheme	
Traffic regulation orders	
PURPOSE-DESIGNED STREET FURNITURE	14
POTENTIAL TIMELINE	15
HOW TO GIVE US YOUR COMMENTS	16

Introduction

About this document

This document summarises initial draft proposals to permanently strengthen on-street security within Bath city centre's busiest streets and spaces.

To help shape the best possible city centre security scheme, the Council really wants to hear the views of:

- People who live and work within, or visit the city centre.
- Business, cultural and service organisations which support the economy and wellbeing of the city.
- Organisations that help protect our heritage and ensure the city is inclusive and welcoming.

Feedback to this consultation should be provided between 16 November 2020 and 15 January 2021.

To give your feedback [click here](#).

Further consultation Spring 2021

Your feedback and suggestions will inform any changes and refinements to the final proposals. Traffic Regulation Orders that will be necessary to enforce proposed access controls will be formally advertised for further public comment in Spring 2021.



Bath city centre public life

A coordinated package of improvements to support Bath city centre recovery

With the help of its partners, Bath & North East Somerset Council continues to work hard to support the economy and community of Bath city centre, particularly now, as we look to the future and recovery from the impacts of Covid-19.

The city centre's streets and public spaces play a vital role in its attractiveness and success. As well as providing access to shops, attractions and homes, they're the setting of our world class heritage and the canvas for the city's vibrant public life.

Covid-19 needed the Council to quickly turn to emergency measures to help Bath re-open safely. In June temporary access restrictions and pavement widening was installed to help social distancing when the Government eased lockdown restrictions. These are planned to be in place up to December 2021, or until social distancing requirements are removed by Government or they are replaced by permanent measures. The Council thanks residents, businesses and service providers for adapting to and supporting these measures at such short notice.

With emergency temporary measures in place the Council is now working with businesses and the Police on a coordinated package of improvements. These will follow and build upon existing and temporary measures to help underpin the city's recovery.



Three key schemes are to be progressed during 2021. Together they will make a significant contribution to city centre safety and security and the quality of its streets and spaces. Each will be progressed with a sequence of consultations in the coming months.

Three key investments for 2021

1. Bath city centre security improvements

There is an acknowledged threat to the United Kingdom from terrorism and past experience has demonstrated that this particular threat is acute in intensely crowded places.

Counter Terrorism Security Advisors have worked with Bath and North East Somerset Council on ways to protect the city centre and have given their support to a scheme which limits vehicle access during busy times.

This is one of a package of measures we have been working on which is designed to improve overall public safety and further strengthen protection in areas of high footfall.

On 16 November the Council is launching an eight week initial public consultation on its draft proposals with the city's residents, businesses and visitors.

**PUBLIC CONSULTATION
16 NOVEMBER 2020 – 15 JANUARY 2021**

**This is the focus of this document.
Find out more below**

2. Kingsmead Square further 'public realm' improvements

Kingsmead Square is an important focus of the city's leisure and evening economy. Proposals aim to make it a safer car free space throughout the day and into the evening.

The existing temporary access restriction will continue, with new street furniture having been installed during October 2020.

- The Kingsmead Square proposals are separate to the City Centre Security proposals and will be subject to a separate consultation on further improvements/ operating hours and whether there should be a permanent access restriction. This separate consultation is planned to take place in early 2021.

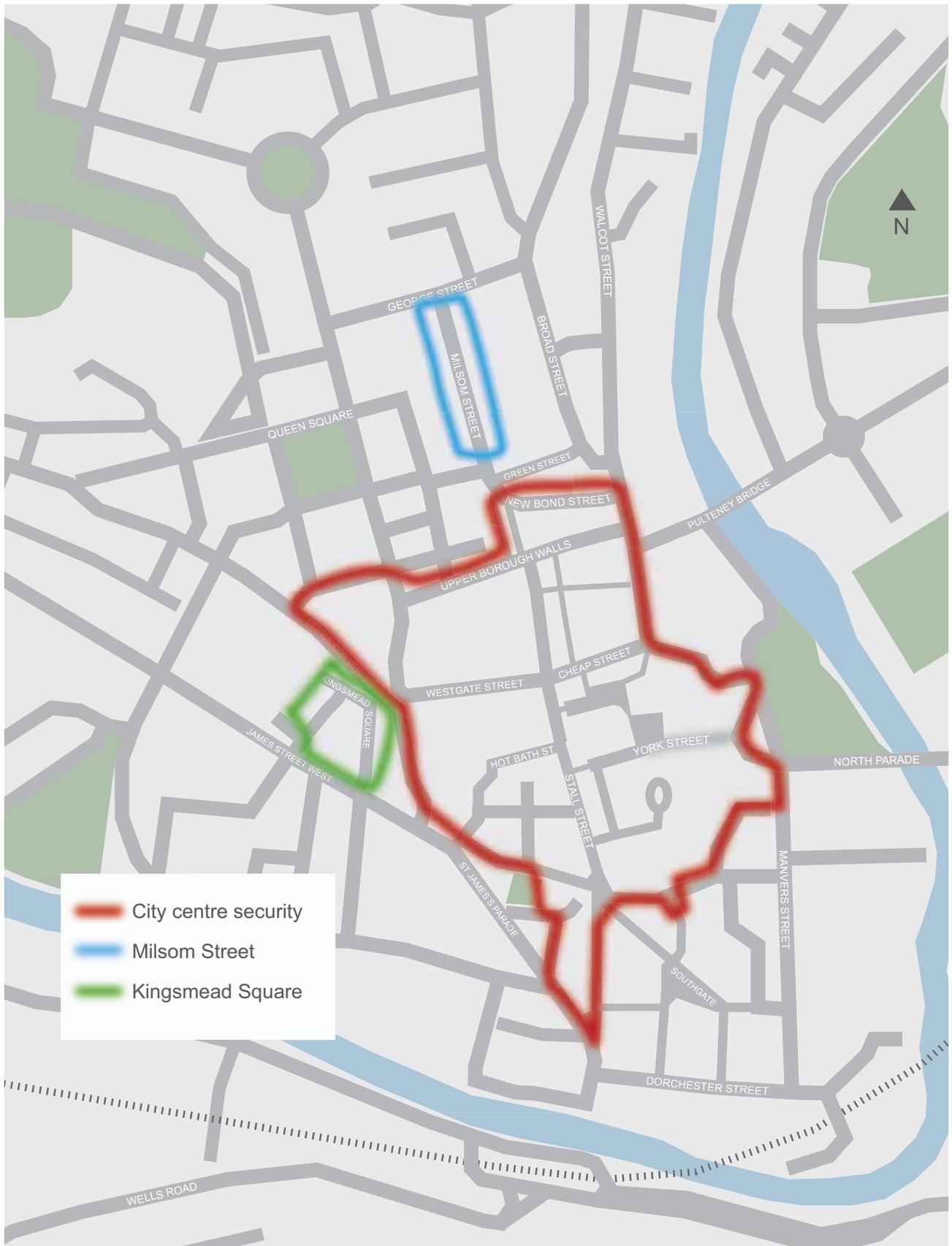
3. Milsom Street: permanent bus gate and access restrictions

Milsom Street is the heart of the "top of the town". But it has suffered from changes in shopping and now from Covid-19 impacts. The Council will be working hard with partners to build a new successful future for the quarter.

The existing temporary "bus gate" will remain in place whilst consultation is undertaken on whether this should become permanent. It is now managed by Automatic Number Plate Recognition (ANPR) camera.

- Any proposals for Milsom Street will be distinct from the City Centre Security scheme and will be subject to separate business and public consultation.

Together they will make a significant contribution to city centre safety and security and the quality of its streets and spaces.



Plan of city centre priority schemes

Context and objectives

Bath security today

Safe and welcoming streets are the heart of a city's economic success.

Sadly, safety and security now must include prevention of terrorism. The Council and Police work together to protect people, livelihoods and the heritage of Bath city centre from this ongoing threat.

Since 2016, the partnership has provided a network of security. This has included:

- local and national intelligence
- City centre CCTV monitoring
- Staff and steward training
- Vehicle access restrictions with concrete barriers to protect the city's most crowded places against the risk of a vehicle based terrorist attack

There is an acknowledged threat to the United Kingdom from terrorism and past experience has demonstrated that this particular threat is acute in intensely crowded places.

The current national threat level is "severe", meaning an attack in the UK is highly likely, although this is not based on a specific threat. City centre security therefore must remain a very important factor in supporting successful recovery.

Prevention and protection from hostile vehicles

Prevention and protection from hostile vehicles is the focus of the proposed security improvement measures.

Protection from hostile vehicles is provided through coordinated activities and measures including:

- Access restrictions and controlled gateways to control vehicles entering crowded places

What is a hostile vehicle?

- A weapon, driven to harm people.
- Containing a bomb parked near a target
- Containing a bomb, driven at a target
- A "Trojan" vehicle, concealing terrorists

- Re-enforced street furniture to prevent hostile vehicles being driven into restricted areas

Improving and strengthening city centre security

The acknowledged threat to the United Kingdom from terrorism, as well as past experience, has demonstrated that the particular threat of hostile vehicles is acute in intensely crowded places like city centres.

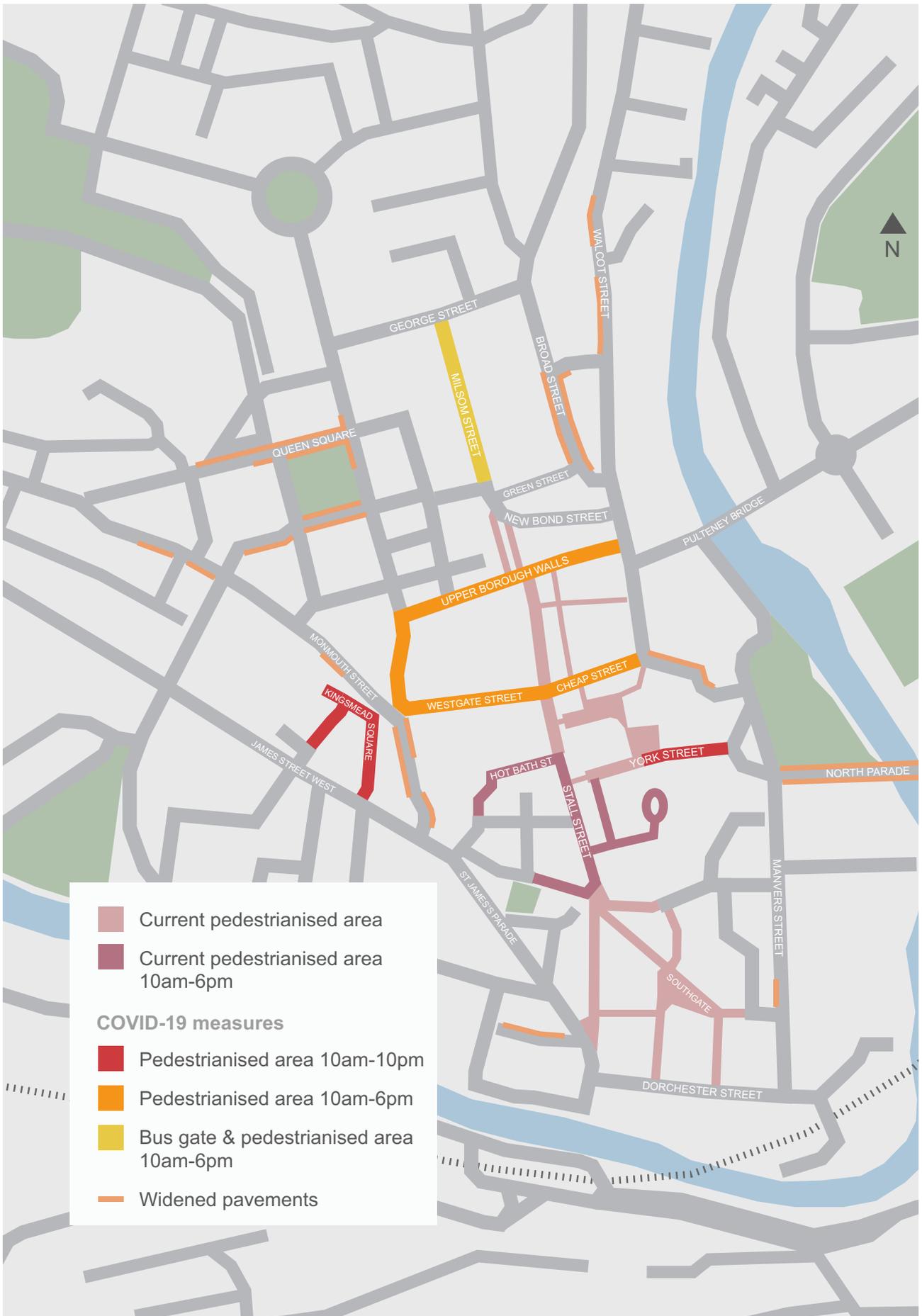
Counter Terrorism Security Advisors have worked with Bath and North East Somerset Council on ways to protect the city centre and have given their support to a scheme which limits vehicle access during busy times.

This is one of a package of measures we have been working on which is designed to improve overall public safety and further strengthen protection in areas of high footfall.

We believe these will create a welcoming, safe and secure environment that will be a big factor in supporting the city's recovery and future success.

This document contains details of the draft 2021 access restriction and security proposals. It will enable local businesses, residents and members of the public to learn more about the scheme. It should be read before providing your feedback.

City centre security must remain a very important factor in supporting successful recovery



Plan of existing access restrictions and temporary Covid-19 measures in city centre

Proposed city centre improvements scheme

Guiding principles

Access restrictions and street furniture will help protect the heart of Bath World Heritage Site, maintain a safe and accessible environment and create opportunities for public life.

The suite of street furniture is currently being developed with the Council's heritage and urban design experts in liaison with Bath Preservation Trust and the Bath World Heritage Site Manager.

The scheme design will be informed by six key criteria contained in Government guidance on the design of hostile vehicle mitigation. The proposed scheme combines:

1 Proportionate measures to manage threats

The proposals for 10.00am to 6.00pm are restricted to those considered absolutely necessary to manage the risk from terrorism informed by the Police and the Centre for the Protection of National Infrastructure (CPNI), with the 6.00pm to 10.00am restrictions maintaining safety within the streets and supporting the daytime proposals.

2 Ensuring an accessible environment

New equipment will be positioned and designed to maintain pedestrian access for all people.

The Council is also commissioning an independent pan-disability study that will inform the scheme's approach to accessible design. It will engage with key stakeholders to inform the schemes approach to accessibility.

3 Design to protect Bath's heritage

The security scheme will ensure it:

- (i) Minimises impact on historic fabric above or below ground
- (ii) Minimises visual impact on heritage setting
- (iii) Improves opportunities to enjoy the city

4 Avoiding street clutter

New security equipment will add to and replace existing temporary equipment and integrate security measures within a suite of multi-functional furniture.

5 Design with maintenance in mind

B&NES Council has committed both capital and revenue funding to enable a high quality of specification that is maintained to a high standard.

6 Future proofed and flexible to counter developing threats

Access restrictions will be designed and reviewed to ensure measures can remain proportionate to and effective in protecting people from threat levels informed by the police.

To maintain security, restrictions must be in place seven days a week and will be enforced all year.

Summary

The proposed scheme combines:

- Vehicle access restrictions within the city centre's most crowded streets
- Strengthened secure vehicle access points controlled/operated by the Council's CCTV control room
- New purpose-designed reinforced static and sliding protective bollards and furniture

Working with the Police, the Council proposes access restrictions that seek to provide appropriately improved security whilst continuing to allow the city's businesses and service providers a viable level of vehicle access.

Area and streets covered

The streets covered within the City Centre Security scheme have been defined as those that are regularly sufficiently crowded to justify use of access restriction traffic regulation orders and protection from the risk of terrorist attack by robust street furniture.

The streets:

- Cheap Street and Westgate Street,
- Stall Street,
- Lower Borough Walls
- Bath Street & Hot Bath Street
- York Street
- Swallow Street
- Saw Close
- Upper Borough Walls

Restricted access periods

To maintain security, restrictions must be in place seven days a week and will be enforced all year.

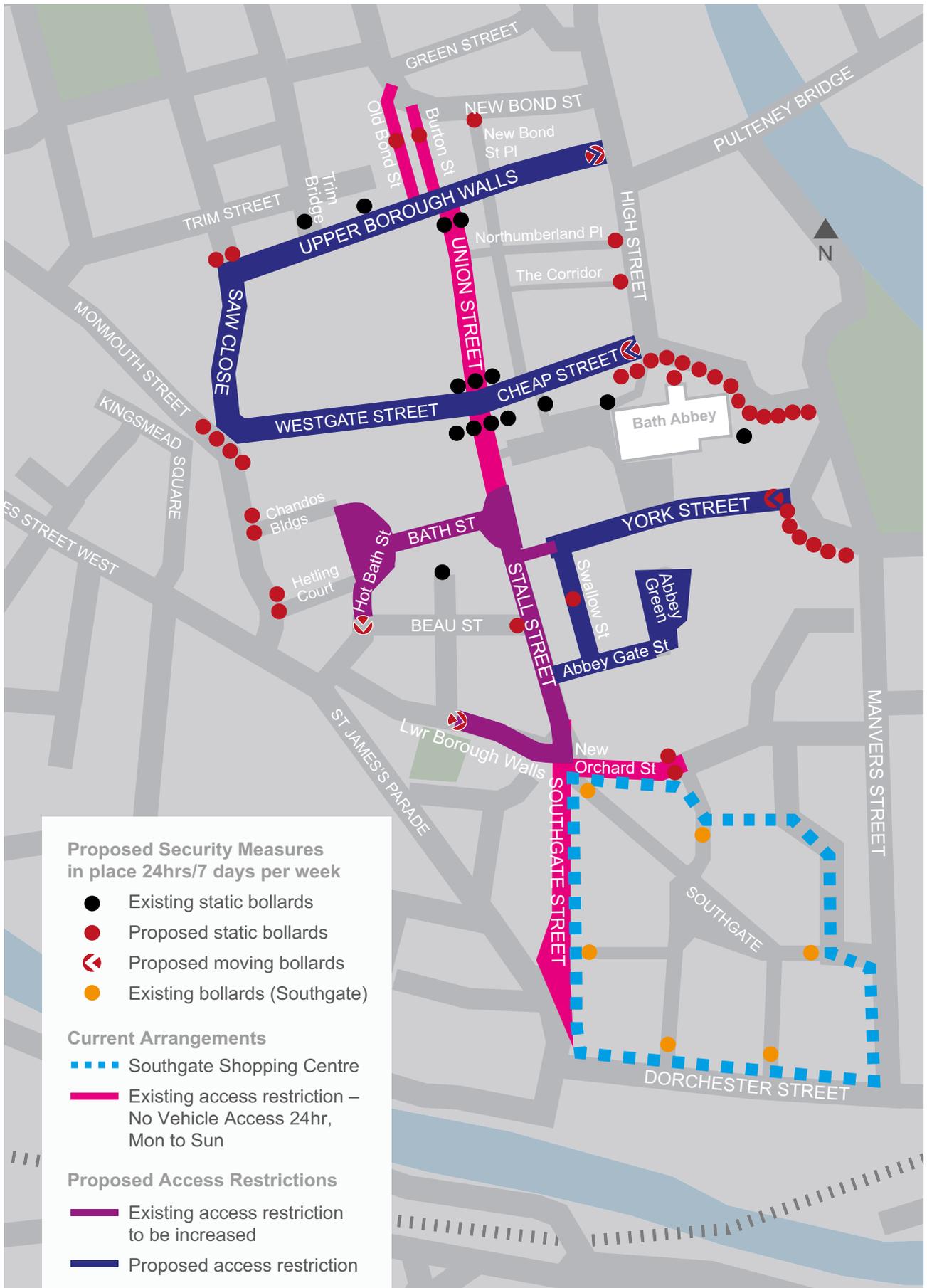
Pedestrian and cyclist access and emergency service attendance will not be affected by the access restrictions at any time.

Between 10am and 6pm restrictions will only allow controlled access by authorised vehicles including construction and maintenance vehicles. These restrictions are similar to the current temporary access restriction measures.

Between 6pm and 10am, it will be necessary to introduce new limited and controlled access to maintain street safety and to support security. This will enable access for street cleaning and refuse collection as well as managed access for business deliveries and delivery of larger goods to residential addresses.

At all times, it will be necessary to prevent opportunities to leave vehicles within the protected area. This requires removing all general vehicle access and car parking, including for residents and people who hold blue badge parking permits. The scheme will create more safe pedestrian space, but the Council recognizes removing parking affects disabled people and those with mobility issues.

Spaces for blue badge holders are available at Southgate and Council car parks, and the Council is also undertaking a pan-disability study in relation to the city centre access restrictions currently proposed, with a view to further mitigating the impacts on the disabled and those with mobility issues.



Bath city centre security proposed access restrictions

Access restriction exemptions

Unrestricted access at all times

- Emergency services responding on a blue light
- Utility vehicles
- Pedestrians and cyclist access not affected

Daytime

10am – 6pm, 365 days

CCTV Controlled Authorised Access only for:

- Construction vehicles
- Highway cleaning and maintenance
- Bank and building society cash in transit
- Residential moves
- Large theatre and film equipment
- Royal Mail
- Temporary events e.g. Christmas Market

Night-time

6pm – 10am, 365 days

CCTV Controlled Limited Access for:

- Shop and business deliveries/collections
- Market traders
- Theatre equipment
- Waste collections
- B&NES Parks service maintenance
- Home delivery for larger items (e.g. white goods)

CCTV Controlled 24 Hour Access Restrictions

No Vehicle Access for:

- Residential vehicles
- Residential deliveries for small items such as food deliveries or small parcels
- General car parking
- Blue badge holders
- Taxis and hackney carriages

Providing alternative car parking and drop off facilities

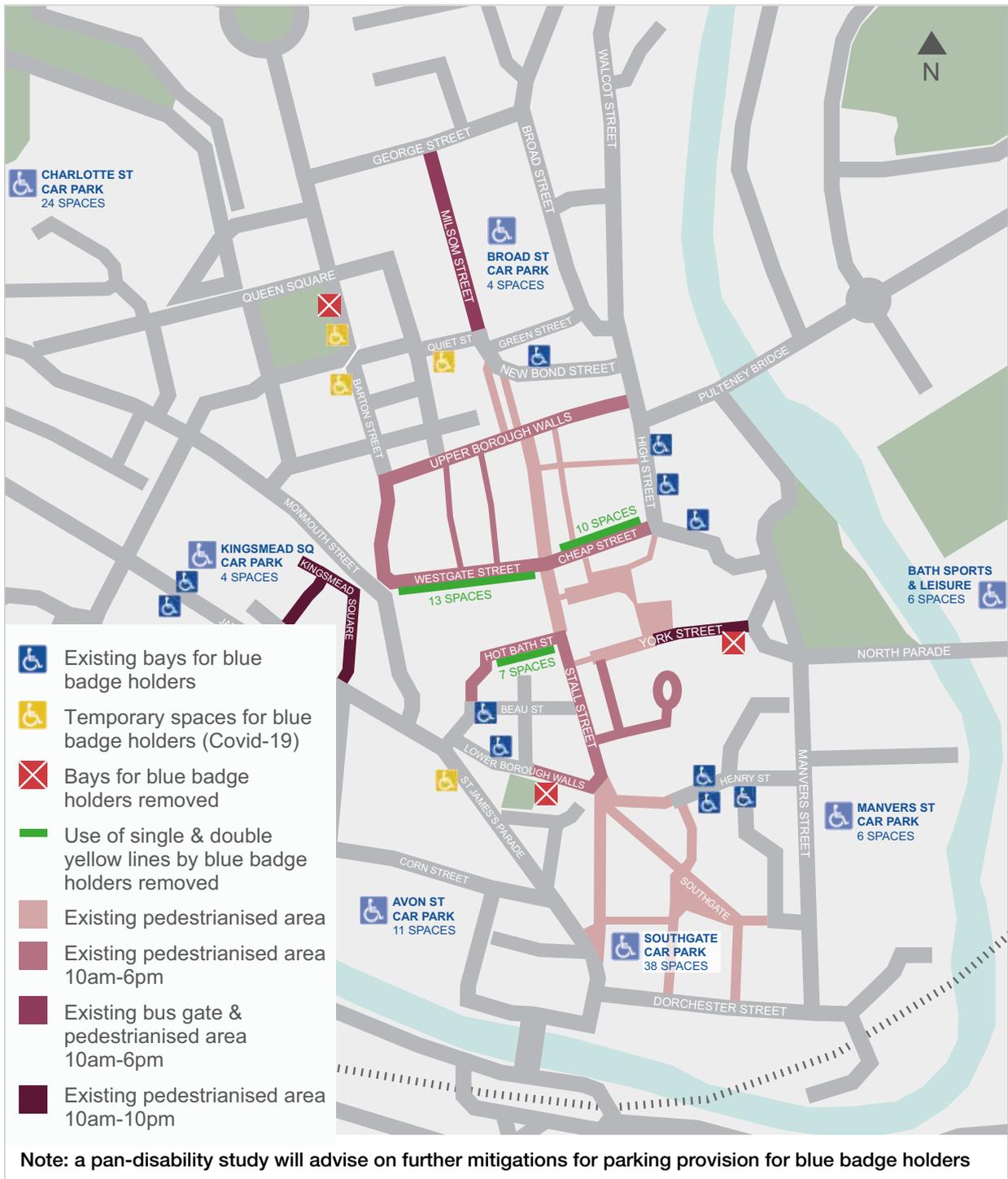
Achieving the higher levels of security in the city centre through restricting vehicle access will create a significantly safer, more spacious and welcoming environment for everyone. This is particularly important whilst social distancing continues to be necessary.

Ensuring sufficient levels of security and safety are maintained throughout the day and night within the restricted area will however require prevention of general private vehicle access and removal of all on-street car parking within the secured streets. This must include car parking spaces for blue badge holders and car access for drop-offs close to venues.

The Council recognizes this reduces the current quality of parking for disabled and mobility impaired people. This cannot be replaced within the security zone.

Spaces for blue badge holders are available at Southgate and Council car parks, and the Council is also commissioning an independent pan-disability study in relation to the city centre access restrictions currently proposed. This will engage with stakeholders to help identify a package of measures to mitigate the impacts on the disabled community and those with mobility issues.

Achieving the higher levels of security in the city centre through restricting vehicle access will create a significantly safer, more spacious and welcoming environment for everyone.



City centre spaces for blue badge holders

Delivering the scheme

Tools to deliver the scheme

The Council will combine two tools to put the proposed city centre security measures in place and then enforce their access restriction and protection.

- Traffic Regulation Orders
- Reinforced Street Furniture with CCTV Access Controls

Traffic Regulation Orders

Councils and the Police have responsibilities and powers to keep our streets accessible and safe for everyone. Controlling when vehicles can access streets or park is part of the toolkit they have to achieve this. **Traffic Regulation Orders** (TROs) are the formal legislation used to enforce vehicle access, street parking and loading.

Government has recently created additional anti-terrorism Traffic Regulation Order powers to enable the Police and Councils to prevent access to a street or area where and when the Police recommend the need for added security demands. These new powers are proposed to be used to protect Bath city centre.

Traffic Regulation Orders proposed

Traffic Regulation Order Restrictions 10.00am to 6.00pm:

Traffic Regulation Orders utilising anti-terrorism powers are used to protect people in specific streets when the Police judge them sufficiently crowded on a daily basis. This must be restricted to the times when they are usually crowded.

The Police consider this applies to the streets around the Abbey between 10am and 6pm seven days a week, all year and has recommended that permanent restrictions are enforced here.

A Traffic Regulation Order for the purpose of preventing or reducing damage connected with terrorism is therefore proposed for the hours 10.00am to 6.00pm.

Traffic Regulation Order Restrictions 6.00pm to 10.00am:

In support of the 10.00am to 6.00pm proposed restrictions, Traffic Regulation Orders are also proposed for the period 6.00pm to 10.00am for the purposes of avoiding danger to persons or other traffic using the road and for preventing damage to the road or to any building on or near the road.

How are Traffic Regulation Orders Made?

All TROs, including those powers relating to anti-terrorism measures, must be decided through a formal process established by highways legislation and managed by the local authority. The proposed changes will be formally advertised by the Council for 21 days. In this time a member of the public or affected party may lodge an objection to the proposals. Any duly made objection must be considered by the local authority, in its determining of whether to “seal” or confirm the TRO.

Initial eight week consultation

To enable views to inform and shape the best possible scheme before it is formally advertised, the Council has committed to this initial eight week period of public consultation. This includes an opportunity to view and comment on proposals at:

www.bathnes.gov.uk/citycentresecurity

Purpose -designed reinforced street furniture

Access restrictions and crowded streets and spaces in many cities are now protected by purpose-designed strengthened suites of permanent street furniture. This can incorporate:

Moving “vehicle access” bollards

To enforce access restrictions and resist hostile vehicles, moving bollard gateways will be installed at entrances into restricted streets. To avoid damage to Bath’s underground cellars and heritage, the scheme is proposing the use of a sliding bollard system which does not require deep foundations.

Static street furniture

Protection of Bath’s city core crowded pedestrian streets and public spaces will be enhanced using a suite of purpose designed street furniture.

Proposed locations of equipment are shown on proposal plans.

Equipment also may include:

- Bollards
- Cycle stands

Detailed designs are currently being considered in collaboration with the Council’s Design and Heritage teams and Heritage stakeholders.



Rising bollards in London

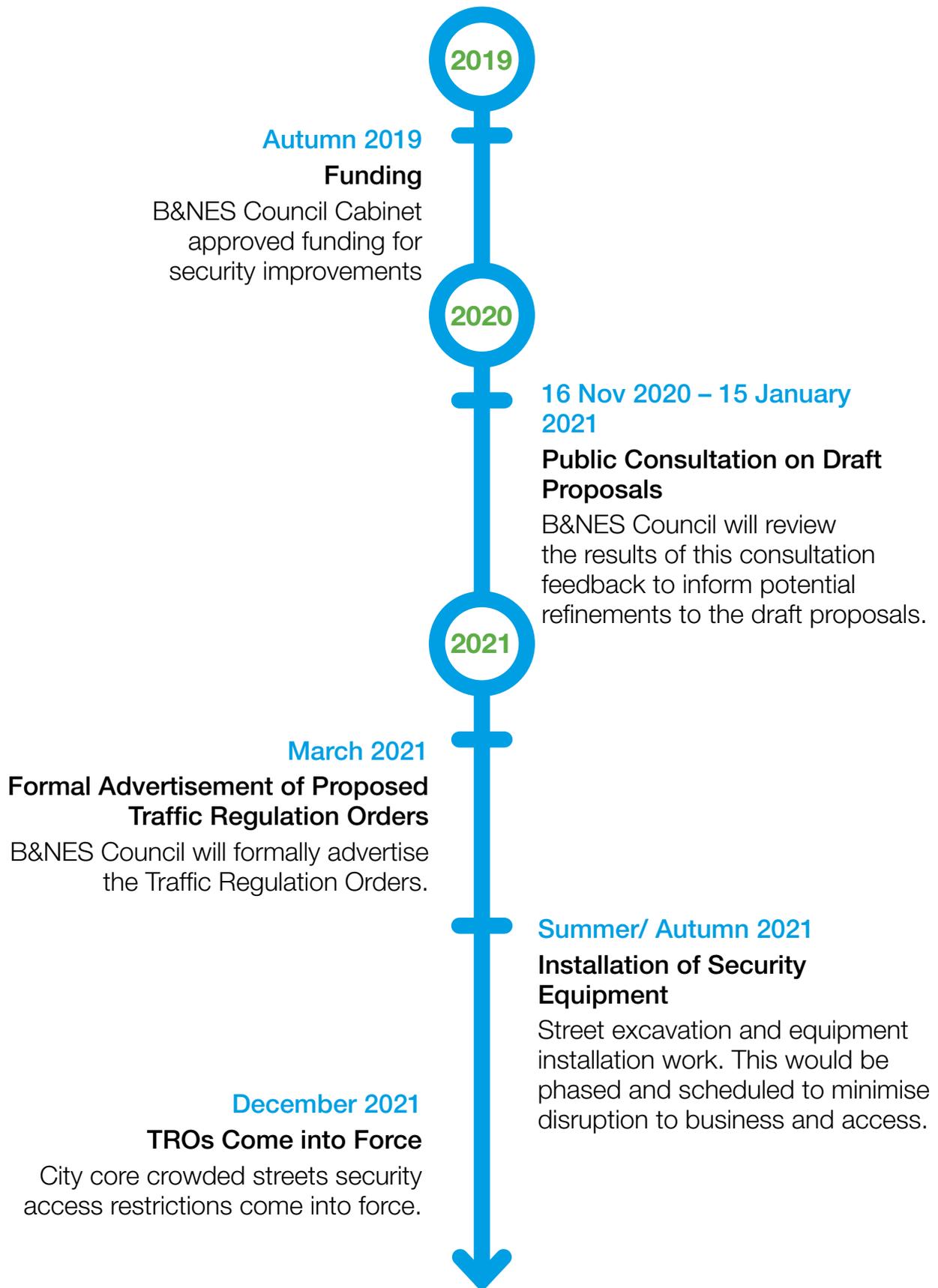


Moving bollards in Southampton



Bollards in London

Potential timeline



How to give us your comments

Feedback to this consultation should be provided between 16 November 2020 and 15 January 2021. To give your feedback online **click here**.

Online

To fill out and submit a feedback form **click here**.

By post

Information about this consultation is available on request in other languages, audio, Braille, large print or other formats.

To request a hard copy or another format please contact us by email citycentresecurity@bathnes.gov.uk or by telephone on 01225 39 40 41.

These can be returned by post to:

Bath and North East Somerset Council
Environmental Services
Lewis House, Manvers Street,
Bath, BA1 1JG

By email

citycentresecurity@bathnes.gov.uk

Thank you for your time and feedback

**Bath & North East
Somerset Council**

Improving People's Lives



Avon and Somerset Police
SERVE.PROTECT.RESPECT.

City Centre Security: Frequently Asked Questions and Answers on proposals

Vehicle Access Restrictions

What type of access restriction will be in place and how will this be managed?

The restricted streets will be signed as 'pedestrian and cycle zones' with automated bollards in place to prevent vehicular access. Access to the city centre will only be allowed via an intercom on a communication pillar. Our CCTV Control Room staff will respond to the intercom and have the final say on who can gain access. It will only be granted to vehicles specified in the traffic regulation order.

I am disabled and need to park outside the shops. How can I do this if you are preventing access?

To maintain necessary levels of security inside the pedestrian zones it will not be possible to park on-street, this includes blue badge holders. There are a number of dedicated disabled bays available within the streets surrounding the access restrictions, including some temporary additional disabled parking in response to Covid-19. The Council has also commissioned a pan-disability study which will advise on further mitigations to disabled parking provision.

Disabled bays for blue badge holders are available within Council car parks at Charlotte St (24 spaces), Avon St (11 spaces), Kingsmead Square (4 spaces), Broad St (4 spaces) and Manvers St (6 spaces). Further spaces are available in private car parks at Southgate (38 spaces) and Podium (13 spaces).

I am a resident living within one of the restricted streets. Will I still be able to receive my food delivery service, parcels or other goods e.g. new washing machine during daytime hours?

Food delivery services will not have access, and will need to be trolleyed or carried in from outside the restricted zone. Smaller parcels will need to be dropped at a collection point e.g. Amazon Dropbox or Collect+ located around the city centre and surrounding areas. For larger goods e.g. new washing machines you will need to apply for a 'one-time use' access permit, which you can apply for on the Council's website.

How will I move to or from a property within one of the pedestrian zones once the new security measures are in place?

You will need to apply for a 'one-time use' access permit, which you can apply for on the Council's website. Subject to approval, permitted vehicles will be required to show a copy of the approved permit to control room staff at the vehicle access point. Failure to present this document will prevent access.

Will I still be able to pick up larger goods purchased in-store by car within the road closure area?

No, you will need to find suitable parking provision outside of the restricted area or make arrangements with the store to deliver to your place of residence. *I live within one of the pedestrian zones. How will I receive medication through my chemist delivery service?*

Pharmacies and medical delivery services will need to find suitable parking provision outside the pedestrian zones at all times.

I am a street trader that operates in Bath. When I can access my pitch location?

Access will be provided before 10am to enable set up and after 6pm to dismantle your pitch. Should you wish to dismantle before 6pm you will need to do so utilising one of the loading bays outside the pedestrian zones.

Where the roads have been restricted will the Council or private waste service providers continue collections at their normal times?

Waste collections will remain the same, ensuring they are completed before 10am or after 6pm to suit the new restrictions.

If I have a fault with one of my utility service providers and the road is closed how can they access my business or property to undertake repairs?

Utility service providers will be able to gain access to make necessary repairs but will be required to provide a number of pieces of information to the Council's CCTV Control Room beforehand before access is granted.

I am due to have work undertaken to my property; will trades people, who require a vehicle, have access while the road is closed?

Between 10am and 6pm, a tradesperson will not be given access to any of the pedestrian zones and should park outside the restricted zone and carry or trolley in their required apparatus. However, if it is considered essential for the trader to have vehicular access, a one-time permit should be applied for via the Council's website by the resident/ business owner.

I have a burst water pipe in my property, will an emergency plumber be given access?

Access for emergency work on a property is permitted, but residents/ business owners will be required to provide one hour's notice to the CCTV Control Room, in addition to details of the tradesperson who will be attending.

Will I be permitted to have a skip delivered/ removed from outside my property or have scaffolding erected/ dismantled on a restricted street?

Yes. Subject to a successful request for a skip/scaffolding license, the Council's skips and scaffolds licensing requirements automatically provides for access. A number of pieces of information will need to be provided to the Council's CCTV Control Room beforehand before access is granted.

Will I still be able to cycle through the restricted streets?

Yes, where permitted and with caution.

Bath City Centre Security Improvements

Equalities Impact and Mitigation Statement

There is an acknowledged threat to the United Kingdom from terrorism and past experience has demonstrated that this particular threat is acute in intensely crowded places.

To maintain the necessary levels of security required as part of the City Centre Security scheme, no on-street car parking will be allowed within the proposed protected areas at any time, including for blue badge holders. The Council recognises this reduces the current quality of parking for disabled and mobility impaired people.

The Council is committed to maximising the accessibility of the city centre and minimising the impacts caused by securing it from terrorist threat. To help achieve this it is commissioning an independent pan-disability access consultant to inform the schemes approach to accessible design. The consultant will engage with stakeholders to help identify a package of measures to mitigate scheme impacts on the disabled community and optimise opportunities to deliver its benefits.

Existing temporary COVID-19 blue badge permit holder parking spaces will remain in place during the consultation period and prior to any resolution and implementation of permanent security proposals and access restrictions, subject to the Government maintaining social distancing requirements.

Dedicated blue badge holder on-street parking bays remain available within the streets surrounding the access restrictions.

Furthermore, disabled bays for blue badge holders are available within Council car parks at Charlotte St (24 spaces), Avon St (11 spaces), Kingsmead Square (4 spaces), Broad St (4 spaces) and Manvers St (6 spaces). Further spaces are available in private car parks at Southgate (38 spaces) and Podium (13 spaces).

A key part of the Council's role is keeping the city's streets and spaces safe and secure from the threat of terrorism. Since 2016, the Council and Avon & Somerset Police have coordinated protection work designed to improve overall public safety and strengthen protection in areas of high footfall.

As the threat to the United Kingdom from terrorism remains, it is important that Bath & North East Somerset Council, with the help of its partners, continues to work hard to support the economy and community of Bath City Centre. The Council has been working closely with the Police on plans to further strengthen City Centre access restrictions and install new purpose-designed street furniture which will provide permanent enhanced safety for people in areas of high footfall.

We'd like your views on proposals to permanently strengthen on-street security within Bath City Centre's busiest streets and spaces.

There is an acknowledged threat to the United Kingdom from terrorism and past experience has demonstrated that this particular threat is acute in intensely crowded places. Avon & Somerset Police Counter Terrorism Security Advisors have worked with Bath and North East Somerset Council on ways to protect people in Bath's most crowded tourist and shopping streets from hostile vehicles by improved, permanent 24 hour, all-year round vehicle access restrictions enforced by robust CCTV controlled gateway points and bollards.

1. Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Bath City Centre Security Scheme

About the protected streets

The streets covered within the City Centre Security scheme have been defined as those that are regularly sufficiently crowded to justify use of access restriction traffic regulation orders and protection from the risk of terrorist attack by robust street furniture.

Please see attached [link](#) to the streets included in the City Centre Security proposal.

2. Do you agree with the streets proposed to be included in the protected area?

- Yes
 No

3. If No, please provide any comments or suggestions

Bath City Centre Security Scheme

About Proposed Daytime Security Access Restrictions

To increase security, between 10am and 6pm only pedestrians, cyclists, emergency and authorised vehicles can be allowed access into the protected area.

Please see attached [link](#) to the restrictions.

4. Do you agree with the limits on the use of the streets between 10am and 6pm?

Yes

No

5. If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?

Bath City Centre Security Scheme

About Proposed Night time Limited Vehicle Access

To maintain safety, between 6pm and 10am only business deliveries and services and home delivery of large items (e.g white goods) will be provided access within the restricted area.

Please see attached [link](#) to the restrictions.

6. Do you agree with the limits on the use of the streets between 6pm and 10am?

Yes

No

7. If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?

Access for mobility scooter users will not be restricted. However, to maintain security and safety levels, no on-street car parking will be allowed within the protected area at any time. The Council recognises this reduces the current quality of parking for disabled and mobility impaired people. The Council is commissioning an independent pan-disability study in relation to the City Centre access restrictions currently proposed. This will engage with stakeholders to help identify a package of measures to mitigate the impacts on the disabled community and those with mobility issues.

8. Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for “blue badge” holders

Additional Comments

9. Please provide any other comments or suggestions below

Bath City Centre Security Scheme

About you

10. What is your interest in the City Centre Security scheme (please select all that apply)

- Bath resident
- Local business
- Service provider
- Bath stakeholder / Community organisation
- Visitor
- Other (please specify)

11. What is your postcode?

12. Do you consider yourself to have a disability?

- Yes
- No
- Prefer not to say

Consultation Feedback Report | Bath City Centre Security Scheme | Final | 17.5.21
Appendix 2 Verbatim Survey Responses

Vehicle access restrictions in the city centre's most crowded streets should be included to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	I consider that security measures should be put in place at specific times eg. christmas market, rugby days, Bath festival, Jane Austen events, etc and not 365 days a year	No	You're challenging terrorists and offering them opportunity to operate after 6pm and before 10am and visit southgate or the train and bus stations. I do not consider that 365 day security is acceptable.	No	At a time when people expect same-day delivery and even home delivery you are asking that 20 day notice is given. This severely restricts the rights of those in central Bath. Delivery costs will rise for after 6pm deliveries, an unfair penalty for those living in the centre of Bath.	I trust that further consideration will be given to the needs of the elderly, unfirm or Blue badge holders. Bath is unlike Oxford, not conducive to cyclists from north to south, which have steep hills. The loss of on-street parking will seriously impact on the ability of traders to make a profit. Your proposals coincide with other places being asked for cheaper, or free, parking. A town in the north has introduced 'park free after three'. What a difference!	A cynic might say that this draconian policy is a way of implementing the Council's obvious hostility to the car, dressed up as a way of making Bath safer. Combined with the Clean Air plans, wider pavements I fear the result will be deserted streets, more empty shops and a serious loss of income for the Council (resulting from unpaid rent, business rates & Council tax - from the hundreds of exempt listed buildings). Yes, the air will be fresher but there will be many fewer in Bath able to breathe it. Cyclists and walkers will not make up the shortfalls. I note that Banes is taking a hard line with those behind with their rent, unlike many private and public company landlords who are allowing deferred payments, & in many cases are writing off some of the arrears. I am 87 & my wife has a Blue badge without car parking - to include Blue Badge parking - we shall shop and visit Frome, Warminster, trowbridge, etc rather than the city we love, to have lived in all our lives. Personally I worked in Central Bath from 1957-2015 and I never thought my Council would embark on a scheme of this nature. A sad tax payer as I write this. I would really like to know whether it was the Avon & Somerset Constabulary, or the Council that first came up with this policy. I suspect the latter. If the Police took the initiative why aren't similar policies being implemented in cities like Salisbury, Taunton,Cheltenham, Swindon, Gloucester, York, Harrogate, etc. Bath cannot be the only town or city that is vulnerable.	I live within Banes, but outside the central area	Yes
Strongly disagree	No	You are being discriminative because of a possibility and why should innocent be affected daily because of criminals.	No	Again you are discriminating against residents and disabled drivers.	No	You do not have the right to affect people's lives at all let alone timetable it.	Give them back all the spaces you have already deleted over the last few years in favour of the casino, taxis, loading bays and stop giving against the disability discrimination act as you are stopping access to their amenities.	I am sending you my long letter of all the reasons why I object and how dare you try this in the middle of a pandemic when most disabled people have been locked in their homes. The government has been protecting us, you are eliminating us from our city.	Bath resident	Yes
Strongly agree	Yes		Yes		No	Emergency access for tradesperson need to be revised. I do not think that 1 hours notice is necessary by the householder. I think perhaps a recommended list of responsible tradesperson be provide that can access the area when necessary.	Perhaps access to an electric chair can be provided, e.g. hired at discount price from city car parks.	It is usually the less able or poorer citizens that will have trouble with all these rules and regulations. More thought, education, publicity and work arounds need to be factored into these new RULES.	Bath resident	Yes
Strongly disagree	No	Why would anyone wanting to execute an attack in Bath be dissuaded by stopping vehicles on a few streets? You have not articulated the scale of potential threat in Bath as opposed to any other City or target in the UK. If it's soft targets and tourists in the Roman Bath/Abbey precinct, it's more likely to be a suicide attack from someone wearing a back pack. I assume the next set of restrictions you come up with will then have to be security checks for everyone coming in to and out of the centre? As our elected representatives you are doing a pretty poor job at understanding what we regard as the likely threats and just how small they are. This feels like unfocused activity that is more to do with the clean air zone than it ever is to deal with terrorist threat. It could be argued that greater concentrations of pedestrians in the new area would actually increase likely fatalities given a similar attack as the Ariana Grande Manchester concert bomb in May 2017. Nothing in these proposals would help. You proposals are for treating symptoms of a problem that I'm not sure we believe we have.	No	I don't believe the proposal in any way reduces risks of terrorist attack.	No	I don't believe the proposals deal in any way with reducing risks of terrorist attack. The terrorists will just target other locations where they can have maximum impact. The Ariana Grande concert attack killed 22 people. A suicide bomber on any of the streets in your proposal could injure and kill many more. A vehicle attack could target and kill many more people in Victoria Park either on the grass or along the wide pavements. Your approach will have wide ramifications to those of us that live in Bath, cost a shed load of money and actually achieve nothing of what you claim.	Please don't take this usual approach of a study to follow to assess the impact. Try working on this from the other end. Access for blue badge holders is a problem now and your proposal just makes it worse and most likely won't stop any terrorist attack. If Bath built a tram network that provided proper blue badge holder support in terms of ease of access, trained helpers, and free parking at a tram stop elsewhere in Bath, you might actually be thinking about their problems before you start asking us to solve the problems you are causing for them.	This whole proposition is ill-conceived, ill-timed and as far as I can ascertain responding to threats that quite honestly are of little concern to many Bath residents. You spent a fortune on the signs for 20mph limits which has added further inappropriate street furniture in almost every street, signage and cameras for the clean air zone and now you want to place bollards and more cameras to stop terrorist attack. You are heading the wrong way and claiming it's because we the tax payers want it. I don't think we do. We want a healthy, attractive City, with vibrant shops and nightlife. You are actively seeking to make the centre of Bath into a 1960's concrete "shopping" centre. They didn't work then and they won't work now. You will remove the essence of the centre of Bath with this proposal and you are not doing it because we asked you to. Vigilant, engaged citizens who love this City and feel you work for and with us is your best defence against terrorism. Don't make this mistake in our name.	Bath resident	No
Neither agree nor disagree	No		No		No				Bath resident	Prefer not to say
Strongly agree	Yes		Yes		Yes				Local business	No
Strongly disagree	No	This seems to be more about banning cars than protecting us from terrorists (or Covid, which is the current excuse). I'd suggest you just leave the streets alone.	No	The 'threat' doesn't warrant this level of over-reaction. If the Council wants to ban cars, it should put its proposals to proper consultation and impact assessment, not hide behind Covid and Terrorism regulations.	No	The proposals are almost certainly illegal because of their discriminatory impact on disabled people. At the very least blue badge holders should be allowed in from 6-10, although it should be 24/7.	Offering extra spaces in council car parks is a fatuous response - the point of the blue badge scheme is to allow disabled people to park near their destinations, not hundreds of metres away. The current situation effectively bars disabled people from Westgate St. They need to be allowed in.	Some of the proposals (such as that someone in the 'protected' zone with a burst pipe will have to wait an extra hour while their plumber is 'authorised') border on the unhelpful. All of them are redolent of a council that thinks the city belongs to them, not to the people who live here. The use of first anti-Covid and now anti-terrorist legislation to push these measures through shows that the council knows they wouldn't stand up to full scrutiny. Please can the council concentrate on delivering good services and leave our streets alone.	Bath stakeholder / Community organisation	No
Agree	No	The principal of restricting traffic on Cheap Street, Westgate, Saw Close and Upper Borough Walls to help prevent vehicle security threats is accepted. However, businesses on these roads still need to operate effectively. This includes the need for deliveries, collections, pick-up and drop-off activities for example. If these can't be accommodated on these streets, suitable mitigation in the form of nearby loading bays or drop-off bays outside of the security zone should therefore be provided.	No	The principal of the times of restrictions is accepted. Deliveries for consumable and perishable goods to businesses would also have to take place during the day when vehicles would not be permitted. If these can't be accommodated on these streets, suitable mitigation in the form of nearby loading bays outside of the security zone should therefore be provided. For instance new or additional bays on Westgate Buildings, Monmouth Street or New Bond Street. This isn't provided for in the current scheme.	No	Businesses in this area would not be anticipated to attract a significant number of vehicle trips largely due to its central location accessible by walking, cycling and public transport. However, visitors, particularly those that may be mobility impaired should be offered a choice of means to reach the businesses on those streets, for instance by taxi from the railway station. The drop-off and pick-up requirements would therefore need to be considered nearby to mitigate the impact on businesses. Additional pick-up and drop-off facilities and "blue badge" parking should be provided close to the existing businesses affected, such as on New Bond Street, Trim Street, Barton Street or Monmouth Street.	Reassurance is required that the vehicle access protocol in place would allow for construction and redevelopment of properties within the zone without excessive restrictions in what is already a complex area for construction to take place.	Local business	Prefer not to say	
Neither agree nor disagree	No	I am very worried about the use of static bollards. I think it is much safer to only use raising bollards - a threat such as fire in the Abbey, for example, would require speedy vehicle access all around the building. Furthermore, it is not known what emergency circumstances may evolve within all the city centre all elsewhere, and static bollards could easily cause delay in vehicle response times to attend those emergencies, or block or restrict access. You cannot know what lies ahead, and should not risk endangering life.	No	I think it unreasonable to city centre residents that they cannot have food deliveries, or utilities and tradespeople to access their homes by vehicle. It is depriving those residents of equal opportunities with residents in other parts of the city.	No	Please read my previous comments. I do not believe it is lawful to deprive residents in the centre of Bath of the ease of access for deliveries and services to their homes	It seems from your map of disabled parking spaces that there are no new ones to be provided. I believe that it is a duty that you investigate the number of residents with the city centre zone who require disabled parking spaces adjacent to their homes and ensure that you provide them in your plan. If you do not, you risk treating them unfairly, and could be guilty of discrimination. You could also risk making the city centre a very undesirable place to live, which I doubt is your intention - this also applies to the previous question.	Although the intention is fair, I think the strategy needs revising. The plans risk making the city centre a very undesirable place to live, which I doubt is your intention. You cannot protect the city from terrorist threats by vehicle access bans alone, and the bans you suggest have problems I have listed previously. I believe that a return of a proper viable and visible police service is essential - and a visible police station. As we sadly know, terrorists can also arrive on foot. We need police regularly patrolling our city and doing other vital police work, as in other major cities.	Bath resident	No
Agree	Yes		Yes		Yes			I am not in a position to question or challenge the Council's view as to whether these restrictions are proportionate to the terrorist threat, on which the entire proposal depends. The major constraints are on residents in the affected area and on the disabled. The proposed pan-disability study ought really to be undertaken and consulted on before the proposed restrictions are implemented.	Bath resident	No
Strongly agree	Yes		Yes		Yes			More pedestrianisation is a good thing.....some people object to any change and see it all as a threat to their convenience. When will they realise we need to use cars less. The whole way we use cars and get aggressive when driving is detrimental to good quality of life. Bath and the world would be a better place with less cars.....	Bath resident	No
Strongly agree	Yes	I would like to see more pedestrianisation regardless of the security risk	Yes		Yes	Limiting cars access is a good thing...people will adapt and it be better for everyone regardless of security risk	Presumably you can always make exceptions for disabled people....just allow the barriers to rise			
Strongly disagree	No	I cannot see the need for this protection scheme, if a terrorist want to create mayhem in Bath none of these measures will stop them!	No	Do you not think the Global Pandemic is hurting city centre traders enough without you sending shoppers elsewhere	No	We've all been encourage to shop on line Now you want to prevent the goods being delivered with ease, have you really thought this through for the current climate? Access to restaurants and theatres, cinemas etc may as well not even attempt to open after Covid -19	So you think the elderly, and partial disabled will go elsewhere to shop and dine and for their entertainment for now UNTIL they are have declined in health enough to have a mobility scooter and then like a lot of ageing scatter /bike riding thugs they come back to Bath and keep riding around 'cos they can't park up. If this wasn't so serious, I'd be laughing at the joke!	You obviously made the information available so difficult to follow on purpose. I imagine few folk had the patience to work their way through it all. I cannot believe in the economic climate we are are in right now, you are STILL planning to go ahead with discretionary so called clean air zone for those who can't afford an electric car which cost more economically and environmentally to produce than a modern combustion engine and the hardship you will cause to the blue badge holders who maybe are still able to walk, but suffer from eg COPD so cannot collect goods and carry them to an outer central car park. Liberal D's don't ever expect my vote again. I thought you were going to be good for Bath.	Bath resident	Yes
Strongly disagree	No	There should be more and easier access for all vehicles to make life easier for residents and reduce pollution from vehicles taking longer, slower routes	No		No				Bath resident	No
									Local business	

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Agree	Yes		No	If the risk is as you say, why not start at 8.00 am?	No	If deliveries can only take place during these hours, presumably the costs of delivery will increase, to be passed on to the buyers	As blue badge holder I am very concerned about this. Until we see the outcome and recommendations from your study it's impossible to comment on specifics. As it stands the proposal, allowing no drop-offs either, will curtail independence. Not everyone can afford a mobility scooter - or has room to house it.	Since we have no details of the terrorism threat it is impossible to know how proportionate these proposals are. Generally the cost of living in Bath will inevitably rise and this will disproportionately impact on the older and poorer population. How about a tourist tax/levy to cover these costs which you say will improve the visitor experience and necessary investment in the arts and heritage sector.	Bath resident	Yes
Strongly disagree	No	Residents, many elderly will have their lives made more difficult especially if they rely on deliveries. Will harm business. Waste of tax payers money.	No	Many people require access for business. Residents inconvenienced. Trojan horse for councils anti vehicle stance. Will drive city business backwards at this hard time.	No	Don't have any.	not necessary if above plans are scrapped.	Ludicrous waste of money. Bath should be moving forward as a vibrant city not getting stuck in aspic. This seems like a dogma driven scheme hidden in a cloak of security.	Bath resident	No
Strongly agree	No	Agree with current scope but Kingsmead Square should be covered as well.	No	Residents should be encouraged to avoid having deliveries between 10am and 6pm and repeat offenders should be spoken to however, for the city centre to be a viable place for people to live, including the disabled and elderly, all the categories in this list apart from "general car parking" should be allowed access at all times. Vehicles that are allowed in must accept that "pedestrians are king" and conduct themselves accordingly. Until we have moved, as a society, to having e.g. plumbers that can service the city centre in vehicles other than motorised ones, we should also allow tradesmen to have access at all times to drop tools etc off then remove their vehicles to a car park. CCTV Controlled 24 Hour Access Restrictions No Vehicle Access for: 1 Residential vehicles 1 Residential deliveries for small items such as food deliveries or small parcels 1 General car parking 1 Blue badge holders 1 Taxis and hackney carriages	No	Please see answer to previous question	Blue badge holders should be allowed access at all times	Other European cities have managed to do this without leaving their residents completely cut off at any time. If we have the overhead of manned CCTV 24x7, this must be possible?	Bath resident Bath stakeholder / Community organisation	No
Disagree	No		No		No				Bath resident	No
Strongly disagree	No	Totally unnecessary especially in the present circumstances with retailers fighting for their economic life. Totally unnecessary particularly in the present circumstances with retailers fighting for their economic life. Also for Blue Badge holders	No	Now it has been decided to introduce this 24/7. See answer to 3.	No	Why not just kill off the city completely. Also what about Blue Badge holders who will no longer be able to visit the Theatre Royal and central shops and restaurants.	A Blue Badge holder such as myself will not be able to reach a central toilet or anything else as I cannot take a bus or walk far. I feel I am being discriminated against compared to any non disabled person who is not affected in any way and maintains full rights.	This whole arrangement is discriminating and wholly unnecessary, thought up by Council employees who obviously have little else to do whilst on full pay during the lockdowns which is patently apparent with regard to trying to read between three maps and three sets of details. How very, very sad that the Liberal Democrat Council can act in such a thoughtless imbecilic manner.	Bath resident Bath resident	Yes
Agree	No	There is an imbalance between risk and access needs in these proposals. Westgate Street and Lower Borough Walls for example do not need to be in the restricted zones and the pavement widening is disproportionate in the light of reasonable access needs for disabled people and deliveries.	No	all the areas are not constantly busy during these boundaries. If any plans go ahead, then regulations need to be more bespoke to and discerning of changes in people volumes.	No	see comments in question 5....	The plans are over the top and take no account of the impairment of quality of living for the many residents in restricted areas - how do they get daily deliveries from Amazon and the like? And what about people with mobility difficulties - these will be hard to solve satisfactorily and the proposals represent an extra layer of pressure on residential and commercial properties in Bath at a time when the pandemic has already wreaked enough damage.	Whilst there is a need for sensible measures to mitigate the risk of terrorist attack, these proposals are disproportionate to the need, especially when balanced against other factors related to the quality of life for residents (especially those with disability or other disadvantage) in Bath and its economy. How about some police presence in Bath to make people in the centre feel a little safer? Kingsmead Square often feels very unsafe after dark and no amount of bollards will mitigate that. These proposals will be severely inhibiting to businesses in Bath and to a good quality of life for residents within the restricted areas and I believe we have already come to realise that it is residents and people who work in Bath who account for a significant portion of spending in Bath's city centre. The balance of risk between safety from terrorist attack and what's right for the Bath community overall is badly out of kilter in these proposals.	Local business Bath stakeholder / Community organisation	No
Strongly disagree	No	you are giving a free rein to all suicide bombers who will be unimpeded by vehicles. By spending all money and time on elaborate technology you are facilitating on foot access. Bath will never be as crowded again, and the threat is minimal. Let the people make their own risk evaluation, and decide whether or not they want to live in a "Nanny state" of a City, and how they perceive the Risk of terrorism to that tiny City somewhere in the South West	No	you simply funnel terrorist thoughts into a narrower time frame	No	Covid and on-line shopping have killed city centres anyway. You are shutting the door after the horse etc. The hospitality trade relies on evening custom. IF any of them survive the pandemic restrictions, then these ridiculously OTT "safety measures" will demolish them for ever	I am a blue badge holder. Do you really think I could walk from Charlotte Street car park into the centre shops AND back? You seem to be ignorant of the fact of disability. My badge has meant I can do essential shopping, although I can never browse shops again, so I suppose my needs are of no consequence to the skewed financial ethic of this Council - spending vast monies on technology for an insubstantial 'terrorist threat, when a few people, however mourned, MAY die or be injured, against the everyday quality of life of residents. Students and visitors are catered for, NOT residents, and now, particularly, blue badge holders who make an insignificant contribution to the Bath economy in the Council's eyes, and can therefore be ignored.	See all previous responses		
Agree	No	I think Orchard Street could be continued to be used for Disabled Parking. Sufficiently strong bollards can be installed by Iceland and at end of current paving. This is a valued resource for those both accessing the shops and Old Theatre Royal.	No	It could terminate at 17:00hrs. There is a significant drop in footfall after 17:00hrs thus the risk factor to pedestrians has decreased. One suspects terrorists will act earlier in the day or be waiting for the cover of darkness to attack an event at either Rugby (outside the area) or the Abbey etc.	No	It should also be possible for organisers of Charity Events to gain access for setting up stalls equipment etc. E.G. the midnight walk for Dorothy House.	We should be looking to provide a transport system within the area for disabled. Using "Golf Buggy" type vehicles.		B&NES Resident with several activities within City Centre	No
Strongly disagree	No		Yes		No	There are many events that take place during evenings at the Pump Room and Roman Baths. I see that deliveries and collections to businesses are permitted from 6pm to 10am. I hope this permission extends to private individuals (eg. wedding couples) needing to collect items such as flowers and gifts left at the end of a wedding or party.	Blue badge holders should have access to parking that is closest to where they live		Bath resident Local business	No
Disagree	No	Limits access for city centre residents and deliveries	No	Access will be required for deliveries. As so many people now depend on online grocery deliveries there needs to full access for delivery and local residents	No	Residents and local citizens should have access to the city	Blue badge holders should have access to parking that is closest to where they live		Bath resident	No
Disagree	No	I love in the centre of town and this would be a disruption not a positive, you are driving people away and making it hard to live in the city of bath. How am I meant to do a food shop and drop my food off at my flat- consider the residents	No	What is our terrorist risk rating? I haven't heard anything of Bath being at risk, you already have temporary barriers up	No	Could do residents permits to grant residents and disable people access, these vehicles and drivers can be vetted	I live on XXX and need access to the loading bay outside my house, maybe you should include permits	You are not prioritising the needs of your residents	Local business Bath resident	No
Neither agree nor disagree	Yes	Need to ensure there is still access for residents and deliveries at all times	Yes	But again there will still need to accessibility for residents	Yes				Bath resident	No
Strongly disagree	No	This will cause massive disruption to residents and business owners and employees with regard to healthcare provision, emergency access, tradesmen's access, deliveries and put huge further economic strain on businesses already struggling with the effects of the pandemic.	No	Do not restrict vehicular access to the city centre at any time.	No	Do not restrict vehicular access to the city centre at any time.	Allow blue badge holders unlimited access to the city centre.	What madness is this to cause a REAL threat to all those who HAVE to access the city centre by putting in restrictions for a PERCEIVED threat?	Bath resident Local business Service provider	No
Neither agree nor disagree	No	Westgate Street should be excluded as it includes several pharmacies which require access. It also includes residential properties which would suffer considerably under the proposals in relation to access by food deliveries, taxis, small parcels, white goods. In the pandemic such deliveries have been a lifeline and the proposal would make living in the area untenable to many.	No	The measures are not practical for businesses or residents reliant on access. They would suffer considerably under the proposals in relation to access by food deliveries, taxis, small parcels, white goods, tradespersons. Even the emergency access seems limited to an hours' notice which in a real emergency seems unworkable. In the pandemic home deliveries have been a lifeline and the proposal would make living in the area untenable to many and dramatically reduce the attractiveness of the properties to businesses and residents. Measures which slow vehicles and make access at speed more difficult alongside improved security measures such as CCTV monitoring or patrolling would be much better than the proposed measures which seem incredibly out of date and kilter with modern life particularly post Covid. This is particularly significant when many premises are empty due to the lockdowns. Such severe restrictions to both residential and commercial premises will put alternative tenants off. More work needs to be done on access for businesses and residents. The measures seem disproportionate to the risk and will come at a financial cost to businesses, residents and landlords in the area. Coupled with clean air policy these proposals make Bath and unattractive proposition without better consideration of infrastructure for delivery and transportation. There seems to be insufficient consideration given to equality and diversity. Residents with mobility issues will struggle to access homes in the area with no taxi journeys and greatly restricted access to deliveries. This will affect the elderly and disabled more than other sectors of the community. There is also a cost implication to residents having to pay for specific delivery slots for larger goods which will impact the less affluent. Has any study been carried out on the demographic mix of the residents in the stated zones to assess this? There also appears to be preferential treatment given to Royal Mail over any other delivery company or service, restricting business and residential choice. Has consideration been given to other companies and courier services? It is also unclear why temporary events such as the Christmas market pose less of a risk and should be permitted compared to the livelihood of on	No	The measures are not practical for businesses or residents reliant on access. They would suffer considerably under the proposals in relation to access by food deliveries, taxis, small parcels, white goods, tradespersons. The emergency access seems limited to an hours' notice which in a real emergency is questionable. In the pandemic home deliveries have been a lifeline and the proposal would make living in the area untenable to many and dramatically reduce the attractiveness of the properties to businesses and residents. Measures which slow vehicles and make access at speed more difficult alongside improved security measures such as CCTV monitoring or patrolling would be much better than the proposed measures which seem incredibly out of date and kilter with modern life particularly post Covid. This is particularly significant when many premises are empty due to the lockdowns. Such severe restrictions to both residential and commercial premises will put alternative tenants off. More work needs to be done on access for businesses and residents. 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In particular, in relation to the almshouses at Monmouth Street where elderly residents require access to disabled parking and deliveries.	Bath resident Local business Bath stakeholder / Community organisation	Prefer not to say

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	If streets are closed it will not stop terrorists! Previous attack in Bath. Dec 1974 a 5lb IRA bomb in the corridor. I worked in Bath when there was concern about IRA activities and I remember the general concern, searching bags etc at the time. It was a frightening time for everyone. 2004, A 21-year-old local who made a number of pipe bombs because he enjoyed the "excitement and intrigue" of it has been jailed for three years. XXX was just a slightly crazy young man and this is the last incidents I remember but is there any current threat? Emails to the council are met with standardised replies signifying nothing...	No	Street closures will not stop terrorists with backpacks. A device in a rucksack can do just as much damage as a vehicle in the middle of a crowd.	No	a device in a rucksack can do just as much damage in the middle of a crowd.	Dont block our streets! This scheme strikes me as someone somewhere improving their CV for future job applications.	The council does not really listen. The clean air zone. Some vehicles charged and some not charged even though identical emissions, leaving out cars for political reasons. I'm sure the councils legal team have covered the bases but surely irresponsible spending of peoples hard earned money should be an offence?	Bath resident	Prefer not to say
Strongly disagree	No		No	Why 6pm? There could be crowds outside this time.	No				Bath resident	No
Disagree	No		No		No	excessive			Bath resident	No
Strongly disagree	No	Most of the restaurants are in the city centre, by not allowing cars to drive there a lot of people will not be able to work and make as much money as they do now. Delivery drivers are as important as taxi and bus drivers.	No	Delivery drivers should have access 24/7 as bus drivers.	No	Delivery drivers should have access 24/7	i have none More loading bays needed for delivery drivers. We cannot park in a car park where we have 2 pay £2 for a fastfood delivery that costs £3 and also have to waste 10/15 mins walking to the restaurants	i find this wrong headed	Bath resident Local business	No No
Strongly disagree	No		No	Blocking access for nothing .	No				Service provider	No
Strongly disagree	No	No streets should be included in an unnecessary protected area. Residents within the proposed area are being seriously discriminated against	No	I think these proposals are mad and an utter disaster for the residents of Bath	No	As before. The whole proposal is ridiculous	Stop the proposals	Terrorist protection is a lame excuse for ridiculous proposals. What is to stop a terrorist on foot? Remember the Manchester Arena?	Bath resident	No
Neither agree nor disagree	No	ACCESS DELEVERIVRYS PEOPLE WITH DISABILTYS LIMITED WALKING	No	CANT ALWAYS DELV SHOPS B4 10 AFTER 6	No		DONT BLOCK STREETS OFF SIMPLES		Bath stakeholder / Community organisation Bath resident	Yes
Strongly disagree	No	you want to transform this beautiful city into a militarised zone, based on a very unlikely probability that terrorists will attack a city with 89,000 inhabitants?	No	there are already too many streets that are restricted, i am a food delivery driver which struggles every day to get access to the restaurants, which are 90% located in city center, we already have to make extra miles, because of restricted streets, if you completely restrict access to vehicles, our business will go down the hill, lots of time lost, cold food, complaints, etc. and all this for a very low probability of a vehicle terrorist attack?	No	people are fed up already with covid restrictions, i don't think this city deserves to be destroyed, more than it already is.	i think you should consider dropping the entire plan and don't make it harder for people to live and work in this beautiful city. There will be more harm than benefit from this plan	i think you should reconsider priority plans for this city, and repair broken roads, invest in education, culture, and businesses, than to spend a lot of tax payers money on unlikely terrorist attacks	Bath resident Local business Service provider	Prefer not to say
Disagree	No		No	Tradesmen need access to do valuable work.	No	Trades men need access to do much valued work.	Opening up the side streets would help decongest the city		Bath stakeholder / Community organisation Bath resident	Prefer not to say
Agree	Yes		Yes		Yes			Why is the one way scheme in Queen's Square not being included in this proposal - allowing pedestrianisation of one side of the square?	Bath resident	No
Strongly disagree	No	I am so glad that we no longer live in Bath as the council seem to want to make it a ghost town.	No	This seems to be more about ridding the city of vehicles to me than security. You are discriminating against people like XXX who needs to be dropped of outside shops as she is not very mobile and also making Bath a very bureaucratic dictatorial place that would be hell to live in under these rules	No	No, because companies will not want the hassle of delivering anything to Bath with these restrictions.	There are lots of elderly and infirm people that don't have blue badges or cars that can be dropped in front of shops at the moment that will not be able to in future. You are discriminating against them and reducing inclusivity and also driving people to shop elsewhere to the detriment of your businesses	if these plans are adopted I pity anyone that lives in this area of Bath as their lives would become a nightmare. Everything from deliveries to burst pipes would seemingly have to involve a load of form filling, future planning, unnecessary bureaucracy and no doubt permit fees. Street closures and parking spaces being removed will increase traffic and pollution around the city as people search for other routes and options. I think a lot of people will not bother with Bath after a while as there are much easier more welcome towns and cities to visit. I still feel this is more about the councils 'known' wish to reduce vehicles in Bath than a security issue. Perhaps the council will prefer it when no-one wants to visit or live in the centre of Bath anymore because it is to much hassle. You will then have the traffic free streets that you seem to hanker after but you will also have no businesses either.	Visitor	Prefer not to say
Disagree	No	Terrorist attacks in UK are as likely to be individuals - by creating a traffic free city centre this mainly disadvantages businesses and those that live there. Any potential terrorist would just find another way to attack Bath, if they somehow think that Bath is a worthwhile target	No	Businesses will be disadvantaged, tax revenue will drop, council tax will have to go up	No	As before	Keep it broadly the same as it is.	This plan is ill thought through for a minor city that has not been identified as a viable target for vehicle borne IEDs. It will disadvantage too many things and comes across as a more likely political agenda of making Bath car-free. This is in my estimation not well thought through and will have foreseeable major long term disadvantages	Bath resident Local business	Yes
Disagree	No	This is unfair on residents.	No	You are discriminating against residents - they will not be able to receive shopping or have tradesmen visit.	No	White goods delivery companies give at best a 4 hour delivery slot for delivery - this is not workable.	No personal experience with this but perhaps a pick up and drop off area instead?	Bath Council seems to be doing its best to make the residents of Bath feel undervalued. As a Bathonian, the latest CAZ and now these measures make me want to move away from Bath as you are making the lives of residents very hard indeed. Life shouldn't be a daily battle, there should be some joy in living in such a beautiful town - it's a town, not a city.	Bath resident Local business	No
Disagree	Yes	There are people unable to walk or cycle to these streets and need to be transported their.	No	There are people - and they don't all have blue badges - who need transport to get to these streets. This proposal makes the wrong assumptions about people who do not walk or cycle.	No	People living in these areas need to have visitors - how can you restrict people and refuse this right?	Not all people who don't walk or cycle are blue badge holders. You are restricting people's freedom. Consequently, local businesses will suffer. The proposals are too restrictive. There are people who will need private transport or they will not visit the city centre.	Make Westgate Street, for example, open for, say 30 mins parking. If someone needs to be taken to Specsavers, for example, how are they supposed to get there if they do not walk or cycle?	Bath resident	No
Agree	Yes		No	I believe that the measures proposed fail to take into account the needs of residents within the area, and discriminate against disabled people by forcing them to leave their vehicles outside the protected zone. The requirements to seek consent to pass into the zone during the day are far too onerous, for example, for tradesmen.	Yes		The ability to pass through the cordon during the day time should be extended to residents, tradesmen and those who are disabled without having to go through an elaborate and bureaucratic process. Pass tags that can operate the moving bollards would be one way of enabling access for essential access.	The proposed extension to the vehicle free zone for security reasons is virtually the same as the area identified in the Public Realm and Movement Strategy as a traffic free area. It is essential that the implementation of the security zone parallels the objectives of this strategy, and is regarded as being totally compatible with the environmental improvement of the city centre. This applies particularly to the amount of new street furniture that will be required, including road signing. There is too much unnecessary road signing within the city and this scheme will add to it. Every effort must be made to limit signing to the absolute minimum.	Bath resident	No
Disagree	No	It's disingenuous of the council to ask such pointed questions and then give such limited choice of answers. For example, question #1 is worded in such a way to get only one response - in support. Of course no one wants terrorist vehicles to gain access to town, but nor do we want town closed to cars.	No	This is a major issue that needs proper consideration by Bath's citizens and how it affects those living in town as well as the effect on restaurants and trade. The council should not base a decision like this on a vary basic online survey which most people would not complete or be aware of.	No	Is the council trying to prevent vehicular access under the guise of 'safety'? What of disabled people who need their food deliveries as well as the needs of restaurants and trade? Closing down the town centre to vehicles is not the right decision for Bath.	The Council are running rough-shod over the rights of Bath citizens and visitors, including the elderly and disabled. We need to retain Blue Badge parking spaces and the rights of those to park and stroll. Some people can only manage to walk for a few minutes and cannot park far away. Unacceptable to close down the town centre to vehicles completely.	Again, the council may have called for a climate change emergency for Bath, unlike most other councils. It does not mean a carte blanche for killing off Bath through closing down town to vehicular access. It feels very undemocratic to put in place such a major change during Covid, when businesses are closed and everyone is at home, probably quite unaware of what the council is planning. Very bad form to try to sneak this through during Covid. If you feel that this pedestrianisation of Bath is the way forward, then hold off on any decisions for a year, to let everyone get back to normal and have their say. City citizens, tourist groups, trade and disabled groups need time to organise and present their case as well.	Bath resident	No
Agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No		No		No				Bath resident	Prefer not to say
Agree	Yes		No		No				Bath resident	No
Strongly agree	Yes		Yes		Yes		Please make cycle lanes clearer. Some need repainting.	Bath will be massively improved by reducing traffic in the centre It will be even more popular with residents and visitors.	Bath resident	No
Strongly agree	Yes		Yes		Yes				Work in centre	No
Disagree	No		No		No				Bath resident	No
Disagree	No		No	because it restricts too many vehicles that need not to be. and 1 hours notice for emergency repairs is ridiculous	No	it would be hard to have deliveries made at these times, due to the delivery companies not being able to know in advance of any hold up or traffic, they won't know what time they are able to arrive	every street should have a limited number of disabled parking giving them enough time to complete a task even I'd they have to move to one street at a time to do so		Bath resident	Prefer not to say
Disagree		If the real reason is 'security' then the area should extend to a much larger area. E.g. George Street, High Street, Broad Street, Pulteney Bridge, Bog Island, Dorchester Street etc. all of which have high footfall.	No	The city centre has already been ripped apart by the huge economic impact of Covid. Just look at the number of empty premises. Making it harder for people to visit the city centre is going to have a catastrophic impact on the City's ability to recover and be the final nail in the coffin to Bath. As a former resident who suffered previous restrictions brought in without consultation I would say all residents within the area should be excluded are they really likely to mount an attack? Permit holders already supply their vehicle details so would be easy to regulate.	No	The night time economy has already been destroyed by Covid why make it suffer more? The council really are being negligent in their duties.	There are already plenty of Blue Badge spaces available. What needs to happen is greater enforcement of vans using these for deliveries.	These ideas are ridiculous. The council are being totally negligent in their duties to act in the interest of the residents and businesses of Bath.	Bath resident Bath stakeholder / Community organisation Visitor	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	Recent bomb threats (Manchester) have been pedestrian. Restricting vehicles will cause serious inconvenience with negligible improvement in security.	No	I disagree with the proposal as a concept. Alternative timing makes it no better.	No	By implementing these proposals we are effectively saying that terror has won and our lives are changed for ever. Perhaps we'd be better served with public awareness / information about the risk levels (do we even have a terrorist risk level for Bath) - than inconveniencing the residents hugely with a scheme which tackles only one small component of any terrorist arsenal.	Leave it as is	See previous answers	Bath resident	No
Strongly disagree	No	I think it is absurd to close streets in case of terrorist threats, that is letting the supposed terrorists win. In fact, I can't think of anything more ridiculous. Terrorist threats, how utterly laughable.	No		No	There doesn't need to have any further security access restrictions	Registering blue badge holders cars and using number plate recognition to let them into the restricted area	This will cause massive inconvenience, not only to residents in the area but to delivery drivers who are on a very tight delivery schedule. Using a supermarket delivery van as an example: the driver needs to find a parking spot outside of the zone, which could be miles away as street parking will be at even more of a premium. Then they will likely have to make multiple trips between the van and the property they are delivering too. This will add several, if not many, minutes to the delivery. They might even stop offering food deliveries to anyone living inside the area. What about blue badge holders who don't use mobility aids but at the same time are not able to walk for longer distances? That means they will lose that precious access and/or independence. If the street parking is reduced, will parking in council car parks be free for blue badge holders, especially for those that one need to park for 5-10 minutes, why should they pay £3.50+ for the privilege of having to go further for a short period of time.	Bath resident	Yes
Strongly disagree	No	Leave it as it is	No	Leave it as it is	No	Leave it as it is	Don't change something that isn't broken	Stop messing with traffic	Bath resident	No
Strongly disagree	No	I think it would be really disappointing to, in my view, 'give in' to the threat of terrorism in this way. I don't feel that the proposed measures are proportionate to the threat posed to security. I am very concerned that disabled or elderly people will not easily be able to access essential transport. Additionally, individuals who live in the affected streets won't be able to get deliveries to their homes.	No	Allow delivery vehicles and taxis for the elderly in at any time.	No	Also allow access for cars or taxis providing transport to elderly or disabled			Local business Bath resident	No
Neither agree nor disagree	Yes		No		Yes			The new street furniture (fixed seating areas with flower boxes) on Milson Street and Kingsmead Square are really great. They really improve the appearance of the area and give the impression that the city cares about the wellbeing of its inhabitants by providing social space and more green planting.	Bath resident	No
Strongly disagree	No		No		No		Ridiculous that blue badge holders/elderly/parents with children are not being made provision for with access - how are they supposed to be included in Bath city centre if they cannot adequately access it.		Bath resident	No
Strongly disagree	No	I strongly disagree with the plans to restrict the freedom of motorists in the city centre. Barriers to separate motorists from pedestrians should be sufficient	No	Favouring access to one group of tax paying residents over another is unacceptable. You risk the economic wellbeing of the city by turning people away.	No	I don't understand why you want to restrict on street parking. Anything that takes blue badge holders to another area (even if a shuttle service is provided to get them back into the centre) is a barrier to their access and adds extra time to their journeys. Some blue badge holders will find this extra time and the hurdles very difficult to deal with. You will end up turning those people away because of their disabilities, that doesn't sound very community-minded and doesn't seem to recognise their genuine needs.	Please consider ALL users of the city when making your decision, even if their behaviours and desires do not match with your own. I don't see any evidence that people are clamouring for these changes to be introduced, no petitions demanding this. It feels very much you are punishing people who have a genuine need to access the city centre via car. You risk making a journey into the city so unbearable and long (especially for rural residents) that they will instead adopt shopping habits in other towns, and B&NES is small enough that those towns are likely to be in other council areas thus depriving our own businesses of much needed income.	B&NES resident	No	
Strongly agree	Yes		Yes		Yes				Bath resident	No
Neither agree nor disagree	No	Access to Blue Badge holders should be provided at all times. Failure to do so is a breach of the Equalities Act, as demonstrated by the recent defeat of the London Mayor in the High Court for similar restrictions	No	Local blue badge holders should be provided with access via mobile bollards	No	Access should be made to all areas for blue badge holders, including in the evenings. If film crew can have access as stated, so should disabled residents.	Disabled bays in car parks is not enough for those only able to walk a short distance. They will not be able to get to where they need. To deprive the disabled access to shops is illegal discrimination, immoral and disgraceful.	The council is using Coronavirus, terrorism and global warming as an excuse in its rabid hatred of vehicle users. CO2 is not produced by electric vehicles. Mobile bollards supported by ANPR could be used to allow emergency and local disabled blue badge holders to get where they need to go. The only way one hears about these consultations is via social media, such as Nextdoor, often after the consultation is closed. This is consultation by evasion and stealth, in hope of spinning the response to back the proposal. I no longer trust this Council, and neither do the majority, given the comments on Nextdoor, etc.	Bath resident	Yes
Strongly agree	Yes		No	1. There must be an adequate and frequent public transport network into the city centre from all directions. This includes Park and Ride including maximum consideration for those whose mobility is restricted. 2. Access restrictions must include those on electric scooters, electric bikes etc., who frequently endanger/frighten pedestrians by their speed and lack of adherence to any Highway Code.	Yes			I would welcome further additions to the street furniture and the planting which has recently been developed around the city, in particular around Southmead, including shrubs and trees as large as practical.	Bath resident	No
Strongly disagree	No	There is no significant threat in the proposed area, a terrorist would choose the rugby ground on a match night. You will deny access to residents within this cordon and retail premises will suffer.	No	Why are 10a.m. and 6p.m. considered sacred hours...in mid-summer the streets are thronged at 9p.m.	No	Deliveries of goods cannot be scheduled to conform to such hours...scrap the whole idea unless you want Bath to collapse as a city....Bath is not a theme park	Obviously, abandoning this wreck less scheme will MAINTAIN accessibility for all people including Blue Badge holders.	Your 'security' plans are quite simply a cover for your determined plan to make Bath centre a pedestrian zone...people live in the centre and need access, shops trade in the centre and need access for supplies at all times. You consider making empty shops into residential accommodations yet deny your prospective residents vehicle access to their homes. There is no significant or definable terrorist threat to Bath city centre. If a terrorist wanted to bomb the centre he'd just arrange a 'delivery' through one of your checkpoints and drive to his detonation destination...he would'nt have to be a genius...you don't have to be geniuses either to see that this security cordon is of zero worth	Bath resident Local business Service provider	Prefer not to say
Strongly disagree	No		No		No		It will be devastating to businesses and city centre residents alike		Bath resident	No
Strongly agree	Yes		Yes		No	I do feel that pedestrian flows are still pretty high between 8am and 10am with people walking to work, too. I realise that there is a compromise with delivery and services access that needs to be taken into account though.	As this involves opening up the roadways of Cheap St, Westgate St and Upper Borough Walls to non-motor traffic, all of which have pavements which are, broadly speaking, extremely inaccessible, the northern part of the scheme seems like a large improvement for access. I worry about the impact on Monmouth St/Seven Dials and that it would end up being used as a drop-off area (although it's not designated as such in the plan). It's already extremely hostile to non-motor traffic as it's used for taxi-rank, and for food pickup services. This scheme will make it even more urgent to protect pedestrian access there from encroachment by motor vehicle parking. Henry St should also have work done to ensure that it remains usable for pedestrian traffic and for the increased amount of use it will get in its role as a key city centre drop-off and pick-up area.	I'm hugely supportive of this scheme, especially being able to avoid the currently unusable pavements of Westgate St and Upper Borough Walls.	Bath resident	Yes
Neither agree nor disagree	Yes		Yes		Yes		I feel that restricting home grocery deliveries and taxi's is unfair and will make life very difficult for those with mobility issues as well as older people		Bath resident	No
Agree	Yes		No	Before 10am is when people are making their way through the streets to work and 6pm the streets will be busy with people returning home- So very busy. Either do it 24hrs or not bother.	No	I think the time period is too broad and the wrong timings again.			Bath resident	No
Strongly disagree	No	I believe that this will make Bath a no go area for all and will no longer be a viable place to work, trade and live. Recent terrorist attacks with the most devastating effects have been committed by Lone Wolves such as the Manchester arena bomber, so will the councils next step be to stop back pack carrying locals and tourists?	No	Obviously terrorists only act during 10am and 6pm. Please note that this is a sarcastic comment as the notion that this would realistically protect the public is laughable. The money would be better spent reinstating a real police presence including a station in the city centre. That would make me feel safer	No	Not all items can be safely moved over large distances on the city pavements on trolleys. People living in the area are going to be charged for the extra time and equipment required by trades to facilitate work that they require done on their property. Trades will struggle to provide services. As a pedestrian I would not enjoy dodging heavy loads being pushed along the streets. This council is destroying the very life of this beautiful vibrant WORKING city. You are driving businesses out of the city and soon all that will be left is student accommodation and tourists.	Totally shameful that this will directly effect the less able of our city. This council just gives token lip service to this and I have absolutely no confidence that this will be resolved. People who have been assessed that they require a blue badge must be able to park at the nearest point to the properties they wish to visit. This is a clear discrimination and will affect a number of vulnerable people. Shame on you	These proposals will not give protection but adversely affect the everyday lives of the local community. The police need to be back in the city that would be more effective and more reassuring than restricting everyday functions of a living city. The proposals effect all who live, work, visit and trade in the city and will adversely effect their day to day lives. Sadly we live with the threat of terrorists and I do not underestimate the concerns that the council have but these restrictions will not stop them as they will just find another way to attack if that is their aim. This is just a hidden agenda to get all vehicles out of the city. The park and ride is not a cheap option and I wonder if council staff have allocated parking spaces in the city car parks. This I think I will ask formally under FOI	Local business Bath resident Local business Service provider	No
Disagree	No	The proposals go too far and are not justified on security grounds. A complete rethink is needed	Yes	There should be no restrictions outside 10:00 to 18:00	No	We have lived successfully without these restrictions for very many years. The security situation does not require this draconian approach	The Council has considerable investment in retail space. It is already losing huge sums in rental income. To restrict vehicle access and put greater restrictions on the retail trade will exacerbate this situation.	These proposals will not aid recovery, they will restrain recovery. The Council should be concentrating on efforts which will enhance the Bath economy not hobble it!	Bath resident	Yes
Agree	Yes		No	For people living inside the restrictions will make life impossible. Can. You imagine an Amazon driver walking from outside the area to make a delivery?	No	Proposed restrictions are far too restrictive	Some limited parking within the restricted area should be provided for disabled	Why are cyclists under no restrictions. Cyclists should be forced to walk within the restricted area.	Bath resident	No
Neither agree nor disagree	No		No		No	nnnnnnnnnnnn				

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly agree	Yes		Yes		Yes		XXX used to own a car and be Blue Badge holders - they now use public transport and taxis.	A Bathonian who has lived and worked in the City all my life I very much support this initiative.	Bath resident	Yes
Strongly disagree	No	Fragile and disabled residents would be excluded and denied freedom to access. This large group is already denied access to the centre with the loss of short term parking in Cheap Street to cover a short distance (walking/wheelchair) to essential shops and businesses. There are many streets no longer available to official blue badge holders. B&NES is guilty of bulldozing the frail and disabled off of the streets and imposing impractical alternatives and facilities remote from the city.	No	The city centre should be better policed (police are rarely seen in the city) and should receive a higher level of training to enable them to have greater security awareness. The city centre should not be denied to residents as it will discourage shoppers- Again the frail and disabled are being denied by B&NES who seem to have become anti-blue badge and for their own peace of mind issuing a map of blue badge spaces, most of which are too far away from shops, businesses or places of interest.	No	Once again it denies the disabled and fragile to enjoy city night life. Once again B&NES is trying to control the activities of the disabled and frail denying them the right to freedom of choice.	If B&NES denies blue badge vehicles from the city centre B&NES denies a right to life for the disabled and fragile! It sounds as if uncaring B&NES has made this decision already with selective representation. The only way B&NES can humanely assist blue badge holders is offering city centre parking which affords ease of physical mobility. Anything less is discrimination against the disabled or frail.	Residents have to have trust in the Councillors they appoint. The trust has to display honesty and loyalty to welfare and quality of life for the residents who appointed the Councillors, who sadly are betraying the wishes of its elderly, disabled and frail residents, most of whom pay their Council Taxes and support the city. Bath is not just here for students or tourists!! The current 'over kill' regarding security is seen as a ploy by B&NES to discriminate pedestrianise the whole city centre. I have mobility weaknesses and from the now nearest blue badge bay cannot walk the distance to Nationwide: Stall Street: Monmouth Street: Milsom Street: I could go on. B&NES has excluded me from enjoying city life.	Local business Bath resident	Yes
Disagree	No	Business owners who need to use vehicles as part of their work - to load products, goods, samples etc. need vehicular access to do so	No	In all honesty comments (even backed up with evidence) are generally ignored by the Council who are he'll bent on their agenda of destroying the city for local (not visitor) users. For years shared access of vehicle and pedestrian has existed with very few incidents to support your strategy. Terrorism is farcical as is the COVID situation that you have used to your benefit in areas of the city and surrounding suburbs	No	I wish I could have said "yes" but your 10am cut off is stupid and unnecessary. 6 9r 7am would be more sensible. 6pm onwards will help with the evening and night culture of the city	Disabled parking should be restricted to marked parking zones rather than anywhere	As a Council you have an agenda regardless of views - at least in my experience - which is why you are SO unpopular. You will push through your proposals and any consultation is purely a tick box exercise however you dress it up. On your heads be the demise of the vibrant and varied culture of what is a beautiful city	Local business	No
Strongly disagree	No	Bath is a touristic area and many tourists are nationals that come to Bath on cars. Restrictions on streets will make that harder, plus as a resident that lives far away from the centre a car is my only way to bring my family to the centre.	No	Only if it applies to areas where infrastructure is weak.	Yes		These should not be replaced. Blue badge holders live a hard life as it is and bringing these measures will be marked as anti-disabilities friendly.	This measures are useless and there is no real threat to Bath as it is to other cities. Rather than these manic proposals focus on trying to make more cycle ways to make it safe for cyclists and motivate it as a way to commute.	Bath resident Health and social services Bath resident	No
Strongly agree	Yes		Yes		Yes		You need to consult disabled groups about this. They will be very unhappy.			No
Strongly disagree	No		No		No		Don't do this	Madness	Bath resident	Yes
Strongly disagree	No	Parking for disabled drivers near theatre royal	No	Theatre matinees twice weekly	No	Disabled parking	Disabled parking close to the theatre	Parking for residents within the area	Bath resident	Yes
Strongly disagree	No	Only occasion when this would be necessary is during the return of the Christmas Market.	No	CCTV with number plate recognition of suspect or stolen vehicles.	No	The police have highlighted there is not any specific threat to the city centre so this measure is unnecessary.	Unnecessary measure.	In 40 years I've lived in Bath including the active years of the IRA there has not been a terrorist threat to the city of Bath. The regional police have told the council there is not a specific threat to Bath. The only occasions when extra security is needed is during the Christmas Market and Royal family visits such as Prince Edward in University graduation week. The most likely case of terrorism would come from a pedestrian with explosives or a knife attack. The best step forward for my council tax would be to reopen a police station to serve the 90 thousand residents of Bath rather than waste money trying to kill access and trade to the city centre.	Bath resident Bath resident Bath resident	Prefer not to say
Strongly disagree	No	Because you are taking freedom away from people and if you get away with this what next passes to visit Bath, should we also have the same in Bradford on Avon there all people who also can be knocked down	No	Definitely, any freedom taken away is not acceptable	No	No more freedom should be taken away			I shop and do business in Bath	Yes
Disagree	No	Cheap Street and Westgate Street must be kept open after 6pm to allow parking for the evening economy.	No		No	There is no need for access restrictions in the evening - there is no security threat when there are no shopping crowds.		Removal of yet more parking spaces in the evening is going to kill restaurants, bars, cinemas etc which are already struggling to survive.	Bath resident	No
Neither agree nor disagree	No		Yes		No				Bath resident Local business	No
Disagree	No	Try putting police on the beat. And the sight of them moving around bath will put most people off doing wrong	Yes				Most disabled only go to do certain tasks shopping banking theatre opticians and dentist. In these areas provide access	Remove all residents parking zones . Open to all with time restrictions as we all should have equal use of the highway	Service provider Service provider	No
Strongly agree	Yes		Yes		Yes				Also a landlord Bath resident	No
Disagree	No	Bath doesn't have a Terrorism problem this is suited by could be problematic at the real and everyday usage for residents	No	There are restrictions that cost residents huge amounts of cost to have to drive round Bath and petrol costs and usage are not ecological	No	Bath is used so infrequently by cars at night. By all means heavy good vehicles for noise etc but but to restrict residents for terror tactics seems strong handed at best	Bath is a real town with living people running their lives within they need to be able to use town. It's not just a museum for people to be drop in and out of	I do understand Bath has developed in the last two decades but it's not a museum it's not a terrorist hotspot. A police station and some well placed bollards and CCTV would be adequate. I feel that the pandemic/ terror is being used as a smokescreen for the council to arbitrarily do what they always wanted and close of the Bath center. Bad for business and residents	Bath resident Local business	Yes
Strongly agree	No	I personally think this is a wee bit over the top. Terrorist? When did Bath ever have a terrorist incident? Knee jerk idiocy if you ask me?	No	There does not need to be restrictions or limits. Restrictions or limits from what?	No	These restrictions are not needed. This is a ridiculous consultation that is not needed.	Try giving better access to the old and disabled because Bath is becoming the Georgian retirement village of the south west!	Yet more of the tax payers money wasted on meaningless projects.	Bath resident	No
Strongly agree	Yes	huknlmii								
Disagree	No		No	Why limit it to 6pm? Deny access at all times, if you have to.	No			Your surveys are always couched in terms of "Should you beat your wife with a) a stick or b) a bat?". You have no interest in residents opinions. This 'anti-terrorism' survey may have been appropriate years ago, but with shops closing up and down the city centre, you should be actively encouraging life into the city. Not stifling it.	Bath resident	No
Disagree	No	Not to this extent	No	Have you forgotten about blue badge holders completely?	No	Life is 24 hours a day especially with busy families you can't control residents day or night if deliveries need to be in this time then so be it	There currently is no free disabled parking in this city during this pandemic, you told me there was they had just been moved, but believe me there is not I drove to every spot and either they didn't exist or was being used but mostly I could not find them, so again either didn't exist or was not clearly marked, I had to pay nearly £5 to go to 2 shops where as I can go to nearly any other town and park for free or for 20p, you are completely discriminating against blue badge holders/disabilities Bath is not that small that we can park up on the outskirts and walk it if you have disabilities you may not have an electric wheel chair, you may not be able to walk a few steps if at all or you may be in huge amounts of pain with every step you take, its not do able Honestly can not believe how poorly Bath treats blue badge holders even in normal times there are what 10 Town accessible free parking spaces and just how many blue badge holders are there? Do they matter, even Moorland Road has what 2 designated disabled bays and how many people in that area or who visit that area as its easier than the city centre have blue badges? Larkhall how many space to badge holders? Weston Village hight street how many disabled bays? 0 ZERO NONE but yet other towns don't have this issue or not as severe or as lacking as Bath, it is absolutely disgraceful discrimination do not close of the few spaces available please, it will be a massive mistake unless its part of the plan that all us Bathonians are predicting.	Just don't do this, please, if its not broken don't fix it!	Bath resident	Yes
Strongly agree	Yes		Yes		Yes				Bath resident	No
Neither agree nor disagree	Yes		No	I had understood that access by commercial vehicles was controlled by staffed cameras, so that deliveries (possibly by appointment) could happen during trading hours. Clearly planning post-Covid is tricky, but the non-tourist commercial heart of Bath should not be damaged.	Yes		Reducing the availability of these spaces in any way should not be allowed as part of any plan. An increase is in fact more appropriate. Badge holders can only be expected to walk a maximum of 200 metres.	Residents (particularly disabled) should not have vehicle access removed unless an adequate alternative form of free parking permit is provided. Unless this plan dovetails with other pedestrianising plans etc it should not be considered alone. XXXX, unless particular targets are identified in the centre of Bath as particularly vulnerable (the Roman Baths for instance) then drawing a wider circumference achieves little additional security. Deep seated security bollards are expensive and disruptive to ground areas which may need preserving - they should be used sparingly. The threat identified needs to be considered in the context of proportionality, with a minimum disruption to other important considerations (resident, commercial, disabled and community access). Mapping a counter-terrorism threat to a World Heritage site can be achieved by looking elsewhere to see what proportionate actions were taken.	Local business Carer for disabled resident	No
Agree	No		No	White good deliveries could be delivered between those times, as they are considered essential items, and the providers do not work to an accurate time slot, and would not necessarily make the delivery in the time allowed.	No	There are residential properties in certain streets affected by these time limits and for those residents that work during the day would have disturbed nights due to deliveries being made.	Reducing the cost for blue badge holders in the major carparks may help.		Bath resident	No
Agree	Yes		Yes					Happy to have York St closed from 10.00am to 6.00pm for traffic to allow easier pedestrian access. Would prefer the bollards in the brochure that automatically rise and fall compared to the unsightly barricade currently in place at the end of York Street. I would like York Street resurfaced to increase street appeal (for pedestrians, not cars). I would also like them to continue the policy of street furniture that is currently in place until September 2021 with perhaps some standardisation to ensure we don't end up with a mish mash of different tables and chairs.	Bath resident	No
Strongly agree	Yes		Yes		Yes		Provision of priority parking facilities on periphery of protected area		Bath resident	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	As a disabled person and blue badge holder for many years I have seen the available parking in Bath City centre eroded over a period of years, not just the current proposals, the provision in car parks is inadequate as it is too far from the shops/cinemas/theatre for mobility restricted people to access. The blue badge scheme (originally orange badge scheme) was conceived to give disabled people independence to access services they need. If this proposal goes ahead disabled people will once again have to rely on family member/friends/neighbors to drive them into town drop them off and then pick them up again, this loss of independence is a loss of self respect. The proposals also ignore the use of the blue badge scheme for parents with autistic/learning disabled children who often have to be able to stop immediately outside a shop or services as they are unable to be controlled safely walking in public open spaces. The point seems to have been ignored and the only consideration given to mobility and non-sighted people.	No	Please see previous comments PLEASE NOTE..the plan on page 12 highlighting loss of yellow line parking to BBH is inaccurate and misleading. it ignores not only the loss of yellow line s in Milsom street but also the loss of all the pay and display parking in Milsom st. it does not identify the loss of 2 disabled spaces at the top of Milsom Street on the left hand side. It ignores the loss of the P&D spaces on the road leading to Kingsmead sq which now has parklets in it. The fairly recently created disabled spaces (3) available from noon in upper borough walls are not marked as lost. The closure of westgate street has put pressure on the single yellow lone by the side of the Guildhall and Victoria art gallery as many goods vehicles and white vans now have to park there while the goods are trolled into the closed area. This is another erosion of available spaces for BBH. yellow lines and P&D spaces outside halfords have been removed for social distancing as have yellow lines in Broad St...will these ever be replaced. Parking i Queen Square has been removed on 2 sides because of the new traffic system all of these have a massive impct on the ability of thos with disabilities being able to access the city centre. Again.. none of these are marked on the proposal map as they are not in the area affected but the map does not tell the whole story.in making these comments I am referring to plans on p7 and p12.	No	can see no reason for the restriction as less people around to ram with a vehicle..over the top provision. surely , ant terrorist can walk a device into a city centre or cycle it in?	Mobility scooters have to be brought into town by car...so spaces are needed to park in! remove charges for DBH in all local authority car parks as previous parking on yellow lines for 3 hours was free. Who are the stake holders and what are the groups being consulted as I have been unable to find reference to any appropriate groups in the area. The proposals affect many Banes residents who visit the city, not just Bath residents...how widely have you published these proposals?	Bath has an increasingly aged population who will become less mobile. If these proposals are implemented you are alienating a large proportion of the population and depriving them of access to restaurants/pubs/shops/entertainment venues. given that Bath will rely on its own population to revive its local retail and hospitality economy before international tourists are able to return...is this a sensible proposal? After the pandemic, shouldnt we be a more caring and considerate society to more vulnerable members of our communities or is Banes so obsessed with keeping cars out of the city that it is prepared to disadvantage its own citizens?	Bath resident	Yes
Agree	Yes		No	The Forum is used as a church, will the disabled members of the church still be allowed to park nearby on a Sunday morning?	Yes				Bath resident	Prefer not to say
Disagree	Yes	The streets identified are sensible, but the restrictions proposed are unworkable for a vibrant mixed-residential and commercial city centre and the anti-terrorism "justification" is preposterous.	No	The restrictions appear to cut off residents, many of whom do not have cars, from aspects of life they may depend on due to the lack of a car. For instance there appears to be no provision to allow residents in the affected areas to receive food deliveries from supermarkets (leave alone take-aways etc.), nor to obtain taxis to/from their home. I'm all in favour of reducing traffic in the city centre and making it pedestrian friendly, but these proposals could make living in the affected area untenable for some residents, which would be a grievous wound to inflict on the city at this time. A more sensible quality-of-life-based proposal should be introduced (possibly over a slightly wider area) with "global pedestrian priority and no marked road for cars to use" and restricted commercial delivery slots, but which should not unduly impede residents amenity.	No	If this is genuinely a security-based proposal then clearly allowing access 6pm (when many of these areas, e.g. around Saw Close) would be as busy or busier until 10pm gives the game away that this isn't really about security. It is noticeable that there is not statement the police support these proposals, and that TROs will be sought on a very vague basis for this timeframe. In terms of access the same comments as previously apply. In particular for older residents preventing them having a taxi to/from their address. Some are likely to be uneasy having to walk through the streets thronged with night life to get to a taxi rank or similar.	n/a	I'm shocked that a liberal council should even have thought fit to bring such a proposal forward. The security justification is just theatre; the actual proposals will make a small improvement on one particular mode of terrorist attack (which despite the government's hyperbolic rating of "severe" risk on a realistic appraisal seems unlikely to be in the list of top five risks to the city) without doing anything to defend against others. As security experts have repeatedly pointed out spending money to protect against the previous terrorist attack method is almost always money wasted; better to spend the money on sensible policing, which protects us both against terrorism and far more mundane, and sadly common, crimes.	Bath resident	No
Strongly agree	No	I would stop all cars going through the centre of town except delivery vehicles	No	How will people deliver things	Yes		Make electronic barriers so that delivery vehicles and disabled people can still have access.	You need to stop the cars on George street. As long as there are cars on George street the influx of traffic on the London road is always going to be absolutely insane. All the children in Snowhill and Larkhall having to walk along there everyday with the fumes. Absolutely crazy. I personally do not understand why the clean air zone penalises vehicles delivering things and not all the cars when we know that most car journeys in bath are less than a mile.. I really hope that cars come in to the clean air zone.	Bath resident	No
Strongly agree	Yes		Yes		Yes	More streets should be included for increased safety for nighttime economy			Bath resident	No
Strongly agree	Yes		Yes		Yes		Pedestrianise the centre of the town and create an amazing cafe culture		Local business	No
Agree	No	Milsom street/ new Bond Street. so many offices that people can't drop things off at. I had to carry three huge boxes from Alfred st. To new Bond Street because my car would have incurred a fine with the new system. I really did my back in. Having some flexibility for those businesses is essential. Not to mention Milsom street is a blue badge hot spot and this will effect disabled people greatly.	Yes		Yes		Put up pretty barriers down milsom street, cover them in flowers or something then allow blue badge holders to park there. You'll see a huge amount of visitors using local permit space in order to park closer to town. You'll devalue property by the lack of easy parking for residents and it's already hard enough to park with a central permit.	The multi story car park behind the collage needs rebuilding which has been in the plans for years. Maybe consider sorting this before restricting even more parking areas in town	Local business	No
Strongly disagree	No	This is a ridiculous scheme if you are disabled or elderly and live within the boundaries of the scheme.	No	I think it's unlikely that it's necessary at all on the grounds of terrorism. I feel it's an underhand way of implementing the pedestrianisation that has been on the councils agenda.	No	This will make Bath a danger for people at night. If there are no vehicles around then the street will be much more dangerous, especially for women. If you have to walk to the taxi rank to get a taxi because they can't drive in the zone.	I think that blue badge holders should be allowed to park as usual. No restrictions. This scheme is unnecessary.	I am so angry at the way Bath council are choosing to completely destroy the city. I know that there is a general trend to ban cars but this city is dying and the council are the ones responsible.	Bath resident	No
Agree	Yes		Yes		Yes		There needs to be more access for blue card holders, just having access in Southgate car park is not enough. Possibly there could be places to drive and wait to drop off or pick up. If these or nothing else is provided then the council is not giving equal access for everyone as they will not be catering for people with disabilities, especially those who find it difficult to walk very far.	If pedestrians and cyclists are to be sharing the space there needs to be some restrictions/signage to indicate where cyclists can go otherwise there's a risk of accidents.	Bath resident	No
Strongly disagree	No		No		No		Leave it as it is		Bath resident	No
Strongly agree	Yes		Yes		Yes				Service provider	No
Agree	No	If the Council is serious about prevent hostile vehicles from Bath City Centre why is this scheme restricted to a very small area? It seems that protection against hostile vehicles is being used as an excuse to ban vehicles from central Bath.	No	Given that residents within the restricted areas and blue badge holders are unlikely to be hostile actors why are they banned from access? Surely they could be vetted in advance and given access. Banning them is illogical.	No	As per previous response.	Given access to the restricted areas for residents of the areas and for Blue Badge holders.	I am strongly against these proposals for the following reasons: 1. Given the huge impact and pressure on the B&NES Council's budget as a result of the Covid-19 Pandemic should this scheme really be a high priority for Council spending. Giving help to businesses and to the residents in Bath would seem to be a much higher priority. 2. Given the change to high streets in many cities and in Bath as a consequence of the pandemic and the ongoing changes to the retail landscape are plans of this type really so necessary? Maybe introduce temporary schemes during periods such as the Christmas Market (if it does continue). 3. If this scheme is really about anti-terrorism why is it restricted to such a small area leaving out potentially busy areas of Central Bath? 4. I assume that widening pavements in Broad Street would prevent any future ideas of making Broad Street 2-way. 5. Preventing vehicular access to residents of the restricted areas and to Blue Badge holders on the basis of anti-terrorist protection is illogical.	Bath resident	No
Agree	Yes		Yes		Yes				Bath resident	No
Disagree	No	Any attacks nowadays use knives	No		No					
Strongly disagree	No	Many of these streets accommodate residential homes where are you propping they park their vehicles?	No	Small business are on there knees without having this to contend with and what about the disabled people needing to get into the centre for things such as eye tests etc	No	Re- think this scheme to enable access for genuine access. I appreciate we must have safer streets and cleaner air in the city. My office (XXX) is and will continue to be in one of the most polluted areas in this city all that seems so be happening ios that all these problems are being pushed out to the outskirts of the town	With your proposed scheme there is little scope for this. This whole proposal needs further thinking and planning for it to work for all of our Bath residents and workforce.	I feel sadden that the city of Bath will become a ghost town more and more businesses will have to close as the cost for deliveries will go up due and in turn of course these costs will be put on to the customer. There has to be a balance for everyone to keep us safe and imprive the city air but many will pay for this unless these plans are really thought out. Already there is a distaste in the air. I have builders working fr us and contractors that are independant traders and are worried about the costs to change their vans etc. I think some of the proposals that are available from what I can see are not sufficiently guarded for fraud but I am not going into this on here.	Local business	No
Disagree	Yes		Yes		Yes					
Disagree	No	It is already incredibly challenging to access certain parts of the city centre by car. XX, who does not drive often cares for my XX while I go to work. In order to drop him off I have to either park a considerable distance away, at a large cost or risk leaving my car illegally parked to drop him off. If these plans are brought forward, it will make situations like this even more challenging. It seems the council are desperate to remove vehicles from the centre and are now trying this on the grounds of 'anti terrorism' there are far more, alternative measures which could be implemented before these drastic measures that will impact many.								
Strongly disagree	No	We will not be safe until everyone predestianising our streets and putting 20 mph limits on our roads is dead. This will save lives by allowing the emergency services to move, reduce congestion and pollution and allow us to build a better greener fairer society where everybody matters	No	Allow access to everyone. So we can have a better greener fairer society where everybody matters	No	Stop closing off roads no cycle lanes on roads. Remove traffic lights at *** junctions	Create more parking for everyone to revive the high street	Equip the police with flame throwers to deal with extinction rebellion riots	Local business	No
Disagree	Yes				No	I don't agree it will always be possible to arrange deliveries in this time frame. Also, devastating to remove disabled parking;is anyone proposing this disabled?	I don't understand how it's possible to 're-home' all the cars of both disabled, and people with parking permits. Do the council really just want no residents?	I find it amazing that an example of an exclusion to this might be the Christmas Market; surely the perfect target for a terror attack, lots of people in one place, excellent.	Local business	No
Strongly disagree	No		No		No				Bath resident	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly agree	Yes		Yes		Yes			This is a very good initiative. Bath is particularly vulnerable to the types of terrorist attacks identified. This is clear given how packed with pedestrians Bath usually is in normal times. A terrorist attack could kill or injure a large number of people. There are clearly related consequences of restricting vehicular access, but these are likely to be very positive overall. Access restrictions will allow a much better environment for pedestrians, making the city centre an even more attractive place to visit. Post covid, the city centre will need to bounce back, and whether this is through retail or other uses, this can be best achieved by creating a pleasant, attractive and vibrant place for people. The loss of access for most vehicles and some parking is small beer by comparison. Disabled people will need careful consideration and it is therefore welcome that the council is assessing this through a specific report.	Bath resident	No
Neither agree nor disagree	No	Only Stall Street, Union Street, Kingsmead Square during the peak times only is security required. Very few people using upper or lower borough walls, hot bath street, York street, Orchard Street and Abbey Gate Street these are not busy or crowded streets therefore very unlikely for a motorist terror attack. Protection for the Abbey area, Roman Baths area, Southgate areas which are already in place. Stall and Union Street and Kingsmead square at peak times required from vehicle attack. Milsom Street which was rarely busy with traffic and never more crowded than Keynsham High Street does not require bus gates for traffic control. Bus gated Milsom Street is of no benefit to pedestrians but a huge source of income to the council from the tourists, businesses and resident's visitors who are unaware of the restrictions and are issued penalty fines.	No	Residents and Businesses and their visitors/customers should always have access to their properties during these times with their vehicle for loading and unloading and dropping off passengers etc. These restrictions should not be imposed on these residents and businesses due to a motorist terror threat. Residents and Businesses of the very few and only necessary streets should be contacted direct and consulted and agreeable plans drawn up on how to proceed.	No	As last answer ..	This planned area is too big and covers unnecessary streets therefore will cause parking issues for the disabled and mobility impaired. Reduce the size of area to the truly crowded areas only and take away the unnecessary bus gates on Milsom Street which is only a benefit to the council and more blue badge parking will be available.	The motorised security risk is only to the areas that become truly crowded so reduce the plan significantly to limit the impact to residents and businesses which also need protecting. Remove the unnecessary bus gates with unfair charging. Consult with the residents and businesses of the few remaining affected streets on how their lives can be improved.	Bath resident Service provider	No
Strongly agree	Yes		Yes		Yes				Bath resident Local business Service provider Bath stakeholder / Community organisation Visitor	Yes
Agree	No	I understand the reasons for trying to do this , but it is difficult enough for businesses to function without people being put off , ie to pick up large items.	No	could it not be possible if a retail business customer were able to give a code ie from a retailer so a customer can gain access to collect / pick up large items.	No	shops need to access their business etc in the evenings, so again if a code etc could be given for this so that it is granted.	I think as previously mentioned. An individual code for a business to use / pass on for access . which would be used for deliveries and large pick ups.	Sorry , no.	Local business	No
Strongly disagree	No	Absolute waste of time and money	Yes	There is no security threat, agree with the limits on the use of the streets between 10am and 6pm	Yes				Bath resident	No
Strongly disagree	No	These proposals do nothing for bomb threats like the Manchester bombing where it was a pedestrian carrying a bomb in a back pack, disabled access is virtually terminated by these proposals	No	Existing restriction pre Covid have been restrictive enough, small traders in Bath have been ravaged by successive poorly conceived traffic management schemes in the past, enough is enough	No	You state that you wish to protect pedestrians at the busiest times and then want the restrictions to apply 24hrs a day !	There should be no restriction on access for blue badge holders, even if the scheme went ahead, blue badge holders must not be disadvantaged in any way	Although this may have been conceived with the best intentions, this is the ringing of the "Passing bell" for Bath as anything other than a Museum where one has to pass through a security fence to enter. The Council will not have the funds to run the city if traders cannot afford to continue and shoppers cannot access the city easily.	Bath resident Local business	No
Strongly agree	Yes		Yes		Yes				Service provider Service provider	No
Strongly agree	Yes		Yes		Yes				Visitor Visitor Visitor	No
Strongly disagree	No		No		No		DIFFICULT TO SEE HOW YOU CAN MITIGATE IMPACT ON DISABLED COMMUNITY	THERE HAS NOT BEEN A TERRORIST INCIDENT IN BATH SINCE THE 1970s. THESE PROPOSALS ARE OVER THE TOP . LOWER KEY MEASURES SHOULD BE ADOPTED.	Bath resident	No
Strongly disagree	No	It is a further impediment to local businesses and local residents, reducing yet more available parking spaces. Yet more ugly street clutter.	No	Enough with the barriers and limits.	No	Not good for night time economy	Already too many residents' bay turned into disabled parking bays which are being underused	This is yet another excuse to turn central Bath into a car free zone which is making it even more difficult for families to live in and enjoy the centre of the city. Also yet another impediment for local shops and cafes which we all miss if they are forced to shut down.	Bath resident Bath resident	No
Strongly disagree	No		No		No				Bath resident	No
Strongly disagree	No	there is no need	Yes		Yes			pointless waste of money	Local business Bath resident Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident Local business Bath resident	No
Strongly disagree	No	No. Terrorism doesn't refer to any specific threat. Terrorists win when you change your behaviour. There is absolutely no evidence to support terrorist measures in Bath because of a generalised terrorist threat.	No	Try more police on the streets who might stop general harassment, problem drinking etc etc, but don't restrict the entire population from their city center because of an unknown terrorist! How is the city to carry out its actual business life!	No	Look, if the 'threat' to the population is so 'great' that you want to change the city, then police the streets properly, escort every vehicle with a policeman in the cab or maybe the police can walk alongside "every" "dangerous" vehicle whilst they carry out their job and then escort them out of Bath again. Sounds expensive or ridiculous that because when you are proposing is ridiculous. Its just the cheapest way to say you've covered your backs. Any terrorist can easily think of a way of driving around a bollard or do you think they are afraid of your security cameras! Be sensible. Get on with your lives and stop changing things that already work well.	I would restrict access to the city council office to people with some sense as it seems most of the 'threat' to the city is coming from there.	No. Terrorism doesn't refer to any specific threat. Terrorists win when you change your behaviour. There is absolutely no evidence to support terrorist measures in Bath because of a generalised terrorist threat. Call it what it is, but it isn't down to terrorism. Has someone just completed a Health and Safety Terrorism Course?	Bath resident Local business	Prefer not to say
Strongly disagree	No	You are changing the character of Bath and for its residents who live within those areas. Restrict cars then they will blow up on foot	No	You do not need this. Have more police on foot and the way to stop terrorists is before they act. Stop this hate on cars	No	What about the trades and jobs that need to access homes to work?	Where on earth do you propose all the existing cars go?- this is insane. They don't just disappear overnight. Stop this war against cars!!! This is what this is all about	Your proposals for more plastic bollards is hideous- why does this council hate cars so much? You cannot push us all onto bicycles. I hate what is happening to Bath, to the businesses being forced out with the development of industrial sites into flats. Your continued bringing in of clean air while we are in Covid. You have no empathy- you don't listen	Bath resident Local business	No
Strongly agree	Yes		No	I live in Parsonage Lane. I am a vulnerable adult who doesn't drive. I feel disabled resident's (with both physical & mental health issues) should be given a permit. Taxis should be able to drop resident's with disability at their front doors. It is hard enough to receive deliveries already. To have to worry about having to match up getting council permission with the delivery company's availability sounds like a very long winded process. For someone with mental health issues this is already making me feel overwhelmed. I feel totally hemmed in without access to the outside world.	No	I already have to order my online shop for after 6.00pm which would not be my preferred time. I feel it is very unfair to expect delivery workers to walk that distance as well as finding a space to park. If I were to get a taxi home it is not safe for them to drop me so far away from my front door.	I feel you are already focusing on physical disability. Disability is not just about physical mobility. I don't have a blue badge as I don't drive, so I rely very heavily on people being able to have access to my address for deliveries & pick up / drop off.	I am very concerned about the risk of a terror attack & I appreciate the Police & Council taking action. However I do think very careful thought needs to be given to residents with disabilities (Equally both physical & mental health) The impact on the daily lives of these residents will be huge. For someone suddenly to inform you that you can't have any kind of vehicle pull up outside your house (without prior permission) you can't park or have a taxi to your property, & then add disability to this situation too, this would lead to a very much reduced quality of life.	Bath resident	Yes
Strongly disagree	No	This council is ****	No	This council needs to get rid of managers not people who shop	No	We are a 24/7 nation		Stop money grabbing you ****	Don't be nosey Bath resident	Yes
Disagree	No	What about the elderly and disabled, ask yourselves can they cycle or walk, come get real!	No	Town is for shopping, do we really want Bath to be full of you democrats environmentalists, no I don't think so.	No			Put a lot more cash into public transportation with fare caps to in courage the public to use it.		
Strongly disagree	No	I am a disabled person with a Blue Badge I cannot walk a great distance. Disabled parking is a necessity not a privilege. It appears that the proposed pedestrian areas will greatly reduce disabled parking spaces.	No	A Bath police Station Manned 24-7	No	Socialising Restaurnts and Bars acces for Taxi and pickup	Blue Badge is a nesesity not a Privilege	I have said all I need to	Regular Visitor you will make This Beautiful City A Fortress	Yes
Strongly disagree	No	Bath is not under thret from terrorism.	No	Bollards on pavements to stop cars mounting pavements.	No			Please do not shut the city centre to cars.	Bath resident	No
Disagree	No		No		No				Service provider	
Agree	Yes		Yes		Yes			I know there's been some hoo hah in the press about how this will affect residents in the centre but, broadly, I think we should be discouraging vehicles in the centre: they have too much priority as it is. As long as the security is proportionate (I trust that's been considered) and those in need of parking, eg disabled people are considered I don't have a problem with the plans.	Bath resident	No
Strongly disagree	No	This is Bath not London the risk of terrorism with cars is minimal. Someone could plant a bomb that is more likely.	No	Perhaps have more bollards on the pavements to stop terrorists from mounting pavements without need to close roads.	No	Deliveroo, uber eats and just eat need access to these roads in town to pick up and drop off food. 6pm to 11pm our busiest time for food delivery.	Disabled people need to be able to park in town.	Please keep roads open. Disabled people and deliveroo drivers need the roads in Bath open.	Bath resident Service provider	No
Disagree									Delivery driver	

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?	
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response	
Strongly disagree	No	The council provides no evidence to substantiate its assertion that there is a security threat that requires vehicle access to be restricted. Since M15 first made Threat Level data available to the general public on 1st August 2006, to the end of this month on 31 January 2021, the threat level for the UK has been severe for 2,867 days and critical for 818, meaning it has been severe or critical for 70% of those days. There is nothing significant about the threat level currently being severe that justifies this proposal. It is just as likely that a terrorist will walk down the street and explode a backpack bomb as it is that they will use a vehicle. Since the London bombings on 7th July 2005 only a small minority of terrorist attacks have involved the use of vehicles, far more have involved pedestrian attackers. If a terrorist really wanted to use a vehicle as a weapon there are plenty of other streets such as the High Street, Manvers Street, James Street West, Monmouth Street, etc where at busy times they could cause just as much damage as in the area proposed. The council has implemented temporary restrictions and closures supposedly as a response to Covid-19, although it is unclear why there was any need to restrict access to these particular roads. With the potential end of social distancing rules in sight as Covid-19 vaccinations are rolled out across the UK population, the Council appears to be trying to use a new threat as an excuse to make these temporary measure permanent. Without credible evidence of a genuine threat from hostile vehicles there is no justification to close any roads.	No	The list of what is and is not permitted makes no sense. Why is Royal Mail permitted into the protected area but not all the other delivery companies? Is it even legal to provide special access to Royal Mail in this way? How are residents and businesses in the area supposed to receive deliveries? Most deliveries happen between the hours of 7am-7pm, meaning that there would be very limited hours for delivery in this area; 7am-10am and 6pm-7pm. It will be very difficult for delivery companies to plan their deliveries to ensure they arrive in those time windows. It will inevitably drive up costs, and it is likely some of those costs will be passed onto the residents and businesses. The information is confusing when it comes to construction. The public consultation document states that construction vehicles will be allowed access between 10am and 6pm, while the FAQ states that tradespeople will not. Whichever is correct, people working in building related trades require access to their vehicle during the day as it contains tools and parts which they will need. To suggest that they should offload all this, and then park outside the area will in most cases not be practical, as will the suggestion that they may need to trolley in their apparatus. If they do have to then this will lead to increased costs which will have to be passed onto the customer. The proposal also seems to take no account of the needs of the disabled, the elderly and those with limited mobility. Not only are private cars banned but also taxis, hackney carriages and blue badge holders. If someone needs to be dropped off or picked up without having to walk more than a few steps this will be impossible. It is not a matter of refining the proposal, the proposal should be withdrawn.	No	To suggest that home delivery of large items should happen between 6pm and 10am is frankly absurd. As most delivery companies only operate between 7am and 7pm this allows very little opportunity to deliver to this area. Particularly when trying to deliver in the morning, a slight delay could mean missing the 10am deadline. The driver would then need to return 8 hours later, after 6pm, and in most cases would then have exceeded their permitted hours for the day. It is also not clear why the terrorist threat is reduced after 6pm. In the summer months in particular there are often large numbers of pedestrians in the centre of Bath into the early to mid-evening as people enjoy the entertainment and leisure activities available in the city centre. It is not a matter of refining the proposal, the proposal should be withdrawn.	The proposal seems to take no account of the needs of the disabled and those with limited mobility. To prevent access to all private cars, blue badge holders and even taxis and hackney carriages means that in many cases there will be no way for these people to access the shops and services within this city centre area. The council has a clear duty to undertake an Equality Impact Assessment. The House of Commons Briefing Paper The Public Sector Equality Duty and Equality Impact Assessments (Number 06591, 8 July 2020) makes clear that "the duty must be fulfilled both before and during consideration of a particular policy, and involves a "conscious approach and state of mind"; "it is not a question of ticking boxes, the duty must be approached in substance, with rigour and with an open mind, and a failure to refer expressly to the duty whilst exercising a public function will not be determinative of whether due regard has been had". The Council states that it "is also commissioning an independent pan-disability study that will inform the scheme's approach to accessible design. It will engage with key stakeholders to inform the schemes approach to accessibility." This does not appear to comply with the council's duty as this security policy has already been formed without conducting an Equality Impact Assessment (EIA). The council also states very clearly that it is only prepared to consider refining the proposal, when in all likelihood an EIA may conclude that the proposal must be scrapped. This does not suggest that the council has an "open mind" as required.	Please provide any other comments or suggestions below	My first comment is that the survey questions are biased, in particular the first question because it is "phrased or formatted in a way that skews people towards a certain answer". The first questions asks "Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles". This question has clearly been phrased to solicit the answer "Strongly agree". It presumes that there is a threat from hostile vehicles, without providing evidence, and how could a respondent not agree that people should be protected from that threat. I believe this invalidates the results of the survey. Secondly, in February 2016 the Cabinet Office published guidelines on consultation. This guidance makes clear that: Firstly - consultation must be at a time when proposals are still at a formative stage and give sufficient reasons for any proposal to permit a person to in the court's words "give an intelligent consideration and response". Secondly - adequate time must be given for consideration and response, and, Finally - the product of consultation must be conscientiously taken into account in finalising any statutory required proposals. This should be evidenced by a briefing document presented to the decision making body in this case the proposal is not formative, but nearly fully formed, and consultation is only to "refine" the proposal not to question its validity or necessity. There is nothing in the consultation that suggests that responses will be "conscientiously taken into account" in the documents provided as part of this public consultation the Council provides no evidence to substantiate its claim that there is a security threat that merits the proposed restrictions. The council uses the fact that the current terrorist threat level is "severe", along with statements such as "There is an acknowledged threat to the United Kingdom from terrorism" and "particular threat of hostile vehicles is acute in intensely crowded places like city centres" to create a climate of fear amongst residents, workers and visitors to the city. As already stated, the threat level has been severe or critical for 70% of days since data was first published on 1st August 2006, so there is no significance to the current threat level. While vehicles have been used in a number of attacks in the UK and abroad, they have not been used in the majority or terrorist attacks. In addition most of the terrorist attacks on UK soil to date have been in major cities such as London and Manchester, not smaller cities such as Bath. The reality would seem to be that security is an excuse to implement a desire to pedestrianise the centre of Bath. This policy was identified by SomersetLive in November 2019: https://www.somersetlive.co.uk/news/somerset-news/details-revealed-plan-pedestrianise-bath-3555046 . The article states "B&NES council has an objective to restrict vehicular access on Cheap St/ Westgate St/ Saw Close and Upper Borough Walls." The council has already used emergency powers provided as a response to Covid-19 to implement many of the restrictions proposed in this consultation, and now wants to find a reason to make these permanent. The council has been campaigning to close Bath streets to nothing but bicycles. This just feeds into your proposals by blaming it on terrorism. You will succeed in destroying the heart of the City	Bath resident	No
Disagree	No		No		No			The current council has been campaigning to close Bath streets to nothing but bicycles. This just feeds into your proposals by blaming it on terrorism. You will succeed in destroying the heart of the City	Bath resident	No	
Strongly disagree	No	A vast over-reaction to a very low risk threat. It's all very illogical, creates practical difficulties, and only nullifies one threat option	No		No	As previously stated, it's just a nonsense idea.	The removal of much of the meter/ street parking with the drastic plastic limits parking options for blue badge holders and is a back door way of reducing blue badge options. If only as much priority was given to blue badge holders as cyclists!	All said, rubbish idea, needs scrapping/ re-thinking. If you want it more pedestrianised, be honest and come up with a realistic plan	Bath resident	No	
Disagree	No	Your first question is worded so that you have to agree if you don't want terrorists to drive a car into people.	No	I would say 10 to 6 is ok if taxis and blue badges are allowed access.	No	Your assumption is that the security risk comes from cars being driven into these streets. But why these particular streets? What about the rest of the city? Also - is this the only way a terrorist could attack? What about drones, pedestrians with backpacks? You say you are doing this to make Bath safe but are there or have there been any known actual threats of this sort or are you just trying to cover all possibilities. Are we making it difficult for everyone to have access to the city centre, and difficult for residents who live there, on a possible worst case scenario - in which case, I would suggest that, this reaction to the threat of terror lets the terrorists win without raising a finger.	This "anti terrorist" plan coupled with the ongoing push for accessibility for anyone wishing to come into Bath. This coupled with the ongoing effects of the pandemic I feel will hasten the death of our high streets - our shops and restaurants. Bath needs car parks (allowing hotels to be built with no extra car parking doesn't help), we need a fast cheap public transport system, taxis and buses and blue badge cars need to be able to have access, local residents/shops and restaurants need to get deliveries. I know that city centre residents who need to use their cars are finding it increasingly difficult to park near their homes, often driving round and round (creating pollution) to find the dwindling spaces.	My main concerns are that planning to close off the city centre at the same time as implementing LTNs are going to make access to the city difficult and off putting at a time when we will be feeling the effects of the pandemic. I am concerned that many businesses won't survive. If it is to reduce pollution some other councils have already found that it actually increases as cars have to go the long way round or forced to choose the main arteries causing an increase along those routes - some councils have reversed their policies as a result. If it is to reduce pollution aren't cars heading that way with the drive to electric cars etc anyway? If it is for real terrorist concerns - yes, of course, no one would want any attack to happen in Bath but these proposals don't protect against all possibilities and we have to weigh up whether they are actually a detriment to local residents and visitors. A suggestion - keep the times of restrictions the same across all bus gates - make sure all restriction notices are very clearly displayed - unless you want to get revenue from mistakes made (especially from locals who find their usual routes restricted and get caught unintentionally). Given Covid restrictions I've only driven around Bath a few times and I was amazed by the hold ups around Queen Square with the new traffic lights - and this was in light Covid traffic... In the past there wasn't any delay - but now idling traffic held on the lights will be causing more pollution...I believe that they have been put in place to make the square more cyclist friendly (?) but does that really work?	Bath resident	No	
Disagree	No	How does the work carried out in Queen's Square improve anything in terms of security or anything else (just one example of many)?	No	With hidden fines and no convenient parking, the council is killing retail off. I for one avoid the town centre completely now...	No	I pay taxes for roads. I should be able to use them. The council is killing off retail and I don't understand why. Terrorism is not a valid reason. Most terrorist attacks are carried out by individuals on foot...	Don't use terrorism as an excuse. Using a pandemic as cover for carrying out work is as candle. Everyone's taxes pay for roads. It is not right to eliminate our access to roads that we paid for. It is not democratic and it is not right. Killing off retail is a bad idea.	Please explain to us, the public, why the council did what it g do is to Queen's Square. Please explain to the public how the work the council has done and will do regardless of what the people want, A) Won't kill off retail and B) prevents a terrorist on foot (by far the most common method) protects anybody or anything. Please explain to us the public what terrorist threats have been made to Bath city centre in the past 20 years so we know what information you have to justify what you are doing.	Bath resident	No	
Strongly disagree	No	Hair brained idea. Terrorists don't need to use vehicles. Knives can and have been used regularly so these measures are not required, expensive and totally pointless.	No	As before	No	As before	Complete and utter waste of our money. Will not stop terrorism but will cause an absolute nightmare to Bath residents living in these areas who actually pay money to BANES to look after their interests.	As before	Bath resident	Prefer not to say	
Disagree	No	More police on streets	No	Disabled access needed	No	More pollution will be caused in surrounding areas	You need to allow Blue Badge holders back in to the city. Currently Milsom Street is no longer accessible for people. such as my 87 year old mother who has shopped there for decades and is now effectively banned. As her carer, I can see how much this has impacted on her. She is NOT able to walk from the Council car parks where parking is available to central stores. She lives adjacent to Kingsmead Square and I haven't even told her this may also be off limits too. Your strategies favour cyclists time and time again and pay insufficient attention to those with poor mobility/sight. Even proposing to exclude them from residents parking areas outside their own zone is a blow. She cannot drive and therefore doesn't own a car so will not be eligible for a resident permit as a Blue Badge holder. I drive her everywhere in my car and therefore cannot apply for a parking permit on her behalf. I have already fed this back on a previous consultation. Please stop removing access for those with disabilities. This is inequality at its worst.	I am not against many of the proposals to reduce congestion, improve air quality and enhance public safety but they always favour able bodied people. Our older and disabled population have suffered enough this last year. Please don't ignore them.	Bath resident	No	
Agree	Yes	Whilst I support the restrictions for all vehicles, these measures do not support those with disabilities AT ALL.	No	I would only agree if there was access for Blue Badge holders	No	As previously stated			Bath resident	No	
Agree	Yes		No		No				Bath resident	No	
Strongly disagree	No	Main threat is no longer via cars or other vehicles. It is from a lone bomber with a backpack walking in to the Bath City centre.	No	City centre security needs to be re-thought by police to encompass mobile threats posed by lone bombers walking into Bath City centre. Example: Manchester bombing.	No	Limiting street use will not stop a lone bomber from just walking in with a backpack - or even a briefcase.	Do not restrict traffic. Else you will block access to shops, force shop closures, discriminate against the disabled and the elderly blue badge holders.	I agree with the proposals, which should make the streets of Bath safer. This plan is outdated. Please start again. Closing down Bath for an imagined threat is disingenuous. To residents it just seems to be a continuation of the left's intention to ban traffic from Bath for political reasons. Definitely not based on science facts. The Manchester bombing was not delivered by a van or a car. It was delivered by a lone bomber wearing a backpack. I am certain that terrorists have learned they can no longer use a vehicle to deliver their bombs. Why are we so slow to catch on to the changing face of terrorism? The aim of terrorism is to make us put in place restrictions that will deny our residents freedoms that were hard-won over the last few wars. Say no to these obsolete security plans. I, and many of my colleagues, do not support these plans.	Bath resident	No	
Strongly disagree	No		No		No				Bath resident	No	
Strongly disagree	No	Just an excuse to pedestrianize; a terrorist can damage elsewhere or with a back pack	No	Just makes life even more difficult	No	Just makes life even more difficult		This is a dishonest method of restricting access. It'll finish Bath as a viable thriving city	Bath resident	No	
Strongly agree	Yes		No	how about shoppers/commuters trying to get through Bath? Are there enough routes through the city centre?	No	many people are around by 10am so this should stop at 7.30am			Bath resident	No	
Strongly agree	No	This is totally ridiculous, to use a terrorist threat as an excuse for anti-car road closures is beyond belief - a determined terrorist will use whatever means in crowded places to attack. Stopping cars won't stop them - terrorists will use knives, bombs, guns, etc...	No	This is totally ridiculous, to use a terrorist threat as an excuse for anti-car road closures is beyond belief - a determined terrorist will use whatever means in crowded places to attack. Stopping cars won't stop them - terrorists will use knives, bombs, guns, etc...	No	This is totally ridiculous, to use a terrorist threat as an excuse for anti-car road closures is beyond belief - a determined terrorist will use whatever means in crowded places to attack. Stopping cars won't stop them - terrorists will use knives, bombs, guns, etc...	This is totally ridiculous, to use a terrorist threat as an excuse for anti-car road closures is beyond belief - a determined terrorist will use whatever means in crowded places to attack. Stopping cars won't stop them - terrorists will use knives, bombs, guns, etc... Your plans will damage business, reduce footfall and isolate residents from their friends and family.	This is totally ridiculous, to use a terrorist threat as an excuse for anti-car road closures is beyond belief - a determined terrorist will use whatever means in crowded places to attack. Stopping cars won't stop them - terrorists will use knives, bombs, guns, etc... Your plans will damage business, reduce footfall and isolate residents from their friends and family. I'm disgusted at this Council for even considering this as a way introducing anti-car, anti-business road closures.	Visitor	No	
Agree	Yes		Yes		No				Bath resident	No	
Agree	Yes		Yes		Yes				Bath resident	No	
Strongly disagree	No		No		No				Bath resident	No	

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?	
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response	
Strongly disagree	No	Shutting down the centre of Bath is to destroy a living, vibrant community. Pensioners, the disabled, the unhealthy and unwell will all be locked out with such severe restrictions on vehicular access	No	Open the city up don't close it down. Too many businesses are suffering already. Why does Bath & North East Somerset Council hates us, the ratepayers and residents, so much?	No	Life does go on after 6PM although councillors might be home and avoiding other people, residents still like to go out. Gosh, some even stay out until 9:00PM at least. Who knew?	On street parking everywhere is essential for "blue badge" holders. This council should be absolutely ashamed of itself for restricting those in the community who, through no fault of their own, must use their cars. Why harm the most vulnerable in our community?	I am looking forward to the next council elections to vote in representatives who actually care about residents rather than the current ones who are intent on punishing and restricting the most vulnerable members of our society. You shld all be ashamed of yourselves. Open Bath for the good of all. Please.	Bath stakeholder / Community organisation	Yes	
Neither agree nor disagree	No	Too small an area. Just plant your bomb outside the area and for all the technology you have installed it wont help.	No	Terrorists don't work to conventional	No	see last answer	if i were a terrorists and knew that blue badges were exempt, guess where i would put something that went bang?	can you tell the difference between a delivery van, builders van, disabled vehicle and a VBIED disguised as one of these? If not its all pointless.	interetsted	Prefer not to say	
Agree	No	I agree in principle within the day 10-6 but I cannot see why vehicle access cannot be granted after 6pm as it is now.	Yes	Although I mainly agree, I do think that restricting repair people like British Gas or other utility companies not being able to park outside a residence to carry out an essential repair is restrictive. Have you seen what they actually have to carry into a customer's house on occasions!	Yes		I think on the whole it will stop people who display a badge parking their vehicle where ever they feel like it and we all know this goes on however I am concerned about those people who have limited mobility will be restricted much more from enjoying what our city has to offer even if to just trying to get to their bank during the day of which most are at the top of town. Disability parking with a limited time might be an idea close to the banks near the top of town so that this section of our society can access what they need to without struggling to walk or wheel themselves to far to get to a bank.		Bath resident	No	
Agree Disagree	Yes No	The proposals do not include any exceptions for blue badges or residents with disabilities and are inherently discriminatory. Until those issues ae resolved then no streets should be restricted in the manner proposed.	Yes No	The proposals appear to ignore the needs of residences and of disabled visitors. A systems of (free)permits for residents and provisions for access for those with disabilities would be more appropriate. It's also concerning that the limits would severely restrict access for deliveries for visitors - the proposals appear to ignore the realities of options available for delivery slots, which often won't fit within the restive hours proposed. While of course consideration must be give to the risks posed by potential terrorism, they must be balances against the negative impact of the restrictions nd in particular how they will disproportionately affect the most vulnerable residents and visitors	Yes No	The proposed limits are excessive and poorly thought through, failing to take into account real life needs for access for residents, for deliveries, for disabled visitors.	It is obvious that preventing all blue badge parking will have the effect of excluding large numbers of disabled residents and visitors from the city and is extraordinarily discriminatory and inappropriate. Mobility scooters are not available or suitable for many with disabilities and permitting them will in no way address the issue. The measures will effectively mean that residents in the impacted areas will be trapped in their homes. It is an appalling suggestion and cannot possibly be justified. The council must take a more proportionate approach and balance the small, hypothetical risk of a terrorist attack against the very real, immediate and serious harm which will be caused by implementing the plans as they stand. One very obvious solution would be to issue (free) residents paermits allowing residents who hold a blue badge to access and park in the affected areas, in the same way that other essential vehicles such as refuse collection vehicles are to be permitted access. A car is just as essential to someone with disabilities as having rubbish collected is, and of course terrorists could hijack a bin lorry and do a huge amount of damage with it, so the council has already shown that it is willing to take some risks. I note that there is no suggestion that the rubbish should be collected by using hand carts which would address that risk. It's no doubt considered disproportionate. You need to think again and recognise that it is equally unacceptable to exclude disabled residents. It is quite extraordinary that the council did nothing to study the impact of these proposals on people with disabilities at the outset, so that their needs could be taken into consideration while putting together proposals, instead of being tacked on as an afterthought half way through the consultation period.	I am shocked and appalled y the total lack of thought or consideration for people with disabilities shown by these proposals. I would urge the council to review it's processes to ensure that, in future, there is proper consultation with, and consideration of, people with disabilities and other minority groups from the outset when considering issues which will affect them, to void such obvious and crass discrimination in future. I expect better of BATH. For what it is worth, I am not myself a blue badge holder but as an able-bodied person the discriminatory and thoughtless nature of these proposals is blindingly obvious and I am at a loss as to how anyone could possibly oppose them to be reasonable of appropriate.	Bath resident Local business local resident living outside the city centre	No Prefer not to say	
Strongly disagree	No	Have you thought of what will happen to all the surrounding streets? Traffic/parking will become a nightmare. What about the loss of resident's central zone parking within the area. Ridiculous that residents within the area cannot receive deliveries. Totally unjustifiable.	No		No	See previous answer	Let them have access!	Bath is becoming so unwelcoming to visitors and seems to have forgotten about its residents and their rights.	Bath resident	No	
Agree	No	There needs to be wider disabled and business delivery access. As a Blue Badge holder living in Mendip I regularly have to travel to Bath, the blue badge bays outside of the Milsom Street area make a quick visit into an expedition having to plan where to park and finding less blue badge bays will present access issues for disabled people who are easily exhausted having to walk further distances from the places they wish to visit. Whilst I support Counter Terrorism Policing this needs to be a balanced approach, outside of London there have been no vehicle attacks. Much of counter terrorism policing is intelligence lead combined with CCTV and ANPR could be used to mitigate the risk without closing off the city centre.	Yes	Disabled access should be granted to Blue Badge holders.	Yes	Disabled access should be granted to Blue Badge holders.	As a blue badge holder resident in Somerset and often travel to Bath, there needs to be access into the city centre for blue badge holders, the risk is that by closing off streets to blue badge holders that they will be effectively forced out of town to shop which will hit small shops in the City Centre and drive away customers who are blue badge holders. Also its worth noting that many blue badge holders have limited mobility and having to walk up hill from South Gate to Milsom Street is exhausting and can lead to pain and breathlessness. There needs to be a greater understanding of the needs of Blue Badge holders and the disabled in access to Milsom St and the City Centre.		Somerset Resident	Yes	
Strongly agree	Yes	access for people with restricted mobility should be maintained, not only wheelchair access but for people who drive and walk with a stick so that they can park on these streets and go to the shops	Yes	access for people with restricted mobility should be maintained, not only wheelchair access but for people who drive and walk with a stick so that they can park on these streets and go to the shops	Yes		This is discriminatory to people who drive and walk with a stick or other aid. Not all people with restricted mobility have mobility scooters.	Other similar scheme allow people who drive and walk with a stick or other aid access in the cars. Not all people with restricted mobility have mobility scooters.	Bath resident	No	
Strongly disagree	No		No		No		Blue badge access is needed at all times. Blue bage holders may be incapable of walking more than 20 metres so must be able to get by car to withing 20 metres of any premises at all times.	There needs to be a full disclosure of all threat assessments before extreme measures such as those suggested are implemented so that anyone accepted can eb certain they are proportionate. On the information currently available the suggested changes are grossly disproportionate.	Service provider Visitor	Yes	
Agree	Yes		Yes		No	City will become a ghost town No late buses to P&R walking and cycling ok for the young Bath has bloody steep hills which the Lib Dems forget	Trams ban dirty diesel cars and vans Clean air plans ridiculous at present London just does it Build a P&R off the A46 until you do Traffic off the M4 will still head straight into the city to park 40 years ago it was a problem and still nothing is done		Bath resident	No	
Strongly agree Strongly agree	Yes No	Should be extended to cover far more of Bath City Centre (retail) pedestrian area.	Yes No	Should be 9am to 10pm	Yes No	Should be 6pm to 9am			Bath City Centre, and Bath generally should be at the forefront clean air, people (not vehicle) centric designs and development.	Bath resident Bath resident	Yes No
Strongly agree	Yes		Yes		Yes					Bath resident	No
Strongly disagree Strongly agree	No No	I think it could be even wider. Guildhall/Waitrose is a particular area of concern. As is Queens Square which often has lots of pedestrians around the park area. Also no mention of areas like the Royal Crescent/Circus which could be targeted	Yes Yes		No Yes		Ensure any street furniture does not cause problems for accessibility. Including A board signs.	Think this is great and has added benefit not only of security but improving air quality/congestion in the city centre which should be a pedestrian dominant area.	Local business Bath resident Bath resident	No No No	
Agree	Yes		Yes		No	I am concerned that residents will not be able to access services to their properties. These must be practicable and support living within the City Centre. It will be critical for Bath to develop as a vibrant multi-use city. Residents will more and more important.	Will be important including access to the Theatre	Could there be a Bathes run approved delivery service for residents. Also quality of street furniture and signage must be merit for a WHS	Bath resident Bath stakeholder / Community organisation	No	
Disagree	No	I don't see how the area around the Abbey and Southgate is more at risk than the bus and train stations or Kingsmead Square. Also, the type of attack causing concern more usually involves a backpack than a vehicle. I know the council wants cars out of the centre but this is a deeply alarmist method of promoting that policy.	Yes	I don't often see vehicles in Westgate St. What I do see are visitors to Bath who believe it is already a pedestrianised area and overenthusiastic cyclists who don't understand that a bicycle isn't a Land Rover. Speed bumps for cyclists may help in this area.	No	I appreciate there are problems but the whole proposal seems badly thought out.	Yes, do please make provision for blue badge holders. I feel that the council will be failing in its duties if it does not.	I think that a lot more evidence of a threat to the city centre is required before these plans, as they are presented in the document, are considered. Anyone on an e scooter or skateboard can commit a crime, removing vehicle access on security grounds isn't the right way to deal with traffic issues.	Bath resident	Yes	
Disagree	Yes		No	Access needed for deliveries and trades otherwise additional costs will be added to the end user for the increased hassle. Free parking will be needed for these people. Is if a boiler breaks and an engineer is needed to come out	No	Should allow business needs minimum ie deliveries, trades etc free unrestricted access 24hrs	24hr park and ride facilities on the out skirts of Bath. New site needed on the east side, plus new by pass to reduce through traffic	Access needed for deliveries and trades	Bath resident Local business Service provider	No	
Disagree	No	This is simply the council seeking to restrict vehicular access and has been raised before - it is totally misleading to now present this as anti terrorism	No	Bath is difficult enough to traverse already this will make matters worse	No			The council should be honest - this has nothing to do with terrorise it is driven by your anti car approach	Bath resident	No	

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Disagree	No	You need to consider why you are protecting the rights of multiple busloads of foreign visitors who have no idea of personal space over the rights and needs of your own citizens, sadly the simple answer is money. This approach is a sellout.	No	You MUST continue to protect residents especially with restricted mobility, to park close to their homes and to receive food deliveries. If banks can move cash but our veterans can't get food, that is just WRONG.	No	1. Make the tourist coaches and other superfluous traffic park further away. 2. To prevent "Trojan" vehicles, better ID with prebooking for bonafide companies working on named projects on prebooked days only, and ban all unauthorised, anonymous "WhiteVans". Like the "Unexpected Caller? Don't Open the Door" initiative.	Blue Badge use MUST NOT be compromised. Mobile residents park free at those nearby carparks you identified, with unlimited access to load/unload at their house eg try shopping with 3 small children 😊.	Greater use of Park&Ride, identify and open another site closeby in Park&Walk distance (I often use XXX, but a bit far for some, can you look at the area near the M&S/McD at Weston Lock? Will help us walk off the chips too 😊👍)	Frequent flyer visitor/shopper/worshipper	Prefer not to say
Agree Strongly agree	No Yes	More streets should be included eg. High Street, Milsom street	Yes Yes		Yes Yes		I strongly support pedestrianising all of Bath city centre permanently The point of a council is to make life better and easier for its people. Millions spent this way does neither.		Bath resident Bath resident	No No
Strongly disagree	No	It is really important to weigh the actual threat of terrorism vs the huge potential difficulty these limits would cause for people of limited mobility (age, disability, young children).	No	What is the actual threat of a terrorist act occurring only between 10am and 6pm? In all likelihood Bath is not likely to be high on any terrorists target - given that it has a highly tourist based population and it is not a centre of central government. While I understand the need for environmental considerations to reduce pollution, using terrorism as an excuse to create a city that look like a bunker is completely pointless and defeats the purpose of Bath being a heritage city and a city that people come to for rest and recreation.	No	See previous comment.			Bath resident Local business	Prefer not to say
Strongly disagree	No		No		No				Visitor	Prefer not to say
Disagree	No	The low threat of terrorism is being used as a pretext to pedestrianise streets in central Bath.	No	It's not an issue of terrorism/security - the only threat is robbery/violence late at night.	No		Avoid removing current access.	As said, do not use the low threat of 'terrorism' as a pretext to drive through pedestrianisation of the streets of central Bath.	Bath resident	No
Neither agree nor disagree Strongly agree	Yes		Yes		Yes				Local business	No
Strongly agree Agree Strongly agree Strongly agree Disagree	Yes Yes Yes Yes No	I think this is a pretext to have fewer cars in Bath. I strongly endorse fewer cars in Bath. But pretending this is to shield the citizens of Bath from a planned terrorist attack is unrealistic. Terrorists don't always use cars to attack innocent people.	Yes Yes Yes Yes Yes		Yes Yes Yes Yes Yes		There is concern for residents living within the area who are vulnerable and who may need personal deliveries.... how will you handle this	Residents living in the area should be consulted more deeply on this plan	Service provider Bath resident Visitor Bath resident Bath resident	No No No No No
Agree	Yes		No	Need further access for residential deliveries. Perhaps licenses could be provided to authorised delivery companies?	No	Need access to delivery vehicles to residential properties.		Bath city centre could well see an increase in residential properties, due to changes in shopping habits that will lead to many unused retail outlets. People will need safe delivery systems.	Bath resident	No
Disagree	No	You are removing access for the most vulnerable, those who are disabled and need access to the City centre.	No	As before, you are restricted the access for disabled people. Bath city centre currently has a lot of empty shops and surely you need to encourage as many people as possible without denying them access. Regarding disabled parking, the car parks charge and are located at extremes of the city centre. Not all disabled people are in wheelchairs.	Yes		The Council should retain the on street parking for disabled people. It is all well and good having bays in car parks but the disabled need to park as close to shops and services as possible. Also, has any consideration been given to the location of bollards and their visibility in relation to the blind and severely visually impaired ?	Please do not reduce the disabled parking provision in the city centre or people will visit elsewhere where they can park their car for free.	Bath resident	Yes
Strongly agree Strongly disagree	Yes Yes		Yes	No vehicles between 10am and 6pm seems best There is no provision for disabled access for blue badge holders. This is a breach of their civil rights and outright discrimination. This is a disgrace in a city that boasts a concern for the whole community.	Yes Yes No	No for the reasons given above	The proposed allocation of Blue Badge parking is some distance from the actual centre where people need to get closer to such places as Chemists. Parking is needed in George St, Gay St and Bond St so as to enable disabled pedestrian access to Milsom St and the top part of the city. Following reduction of Blue Badge spaces in the City centre further consideration needs to be given to disabled residents who live in the City. Shoppers and visitors from outside the city compete for available parking. A suggestion is that the 3 hour restriction be removed from Lower Borough Walls and Beau St and increasing disabled parking in St James. For City Centre disabled residents the Car Parks around the centre are too far to walk to.	As people become older and more infirm they wish to move closer to the centre so as to be close to food and health facilities. These are the basic needs. Social events such as visiting the Theatre and eating out are made almost impossible with so many restrictions. The Council should wish to support this section of the community with the same enthusiasm as other parts of the community.	Bath resident Bath resident Bath resident	No No Yes
Strongly agree	Yes		Yes		Yes		Probably best to consult with 'blue badge' users to seek their suggestions	Whilst these measures have caused some understandable rage amongst some residents, if the threat of terrorism is high then we should do what we can to prevent this rather than be reactive after any such attacks.	Bath resident	No
Agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No	It is obvious to me that terrorism plays little part in your deliberations, and this is simply a ploy to pedestrianize these central streets for aimless tourists to wander in.	No	Please remember these restrictions only serve to make it even more difficult for older persons especially, to access key sites within this area. The problem is not parking but the inability to simply drive into or through the town. As it is myself and friends already find we are travelling to shop in Salford, Keynsham and Longwell Green. Surprisingly these places do not find they have a terrorism problem.	No		It is clear you have significantly reduced access for blue badge holders already. In addition the exorbitant cost of car parking around Bath for others means the only shoppers the town centre sees are either tourists or coach parties from Wales (when allowed).	I am appalled by the sheer underhandedness of this project and the dishonesty of its adherents. The traffic controls governing all the approaches to the town are so badly judged and problematic that your time and our money would be better spent in improving some of these.	Local business Bath resident	No
Agree Strongly agree	Yes Yes		Yes Yes		Yes Yes			Please extend parking ban through the city and increase cycling provision with dedicated lanes, Better cycling racks/storage in the centre of town	Bath resident	No
Agree	Yes		Yes		Yes			This consultation is primarily about security however thought should be given to the safety of pedestrians particularly in Cheap and Westgate Streets which are heavily used by cyclists who have little consideration for pedestrians and feel that their bell is a universal passport to priority.	Bath resident	No
Strongly agree Strongly agree Strongly disagree	Yes Yes No	The above statement refers to the streets covered as being 'those that are regularly sufficiently crowded'. There are many other places that are similarly or more 'crowded' such as: Pulteney Bridge, North Parade outside the Sports Centre, outside the Podium, New Bond Street, Dorchester Street outside the Railway Station to name but a few.	Yes Yes No	I believe that due consideration has not been given to two groups of people who will be severely detrimentally impacted by this proposal. 1. People with disabilities and limited mobility will have their independence and opportunities compromised by being denied access to an increased area of the city centre. 2. The hundreds of people living within the proposed restricted area will also suffer. Those who rely on vehicular access close to their homes will lose it. And delivery drivers will have further to walk to make online deliveries and food deliveries and some may well decide to make this a no-go area. Also there is also the obvious anomaly of allowing Royal Mail to have access whilst banning all other delivery vehicles.	No	If the purpose of the security measures is to make 'sufficiently crowded' streets safer, then there is no justification for limiting access when the shops are shut, and the streets are not crowded.	The Council should have consulted all stakeholders before this proposal was written. This 'pan disability' study should have been commissioned at the outset and the findings from this and consultations with all other stakeholders incorporated into the current proposal.	1. The whole premise on which this proposal hinges is that there is a significant threat of a vehicle-based terrorist attack in Bath. The M15 current threat level of 'severe' is for the whole of the UK and is based on all forms of terrorist attack. Looking at the terrorist attacks that have taken place in the UK in recent years, this type of attack is much less common than attacks using bombs or knives and have resulted in many fewer deaths and injuries. The proposed security measures will have no effect on the more common and more deadly forms of terrorist attack. All of the vehicle-based terrorist attacks, except one at Glasgow Airport, have taken place in London. Almost without exception all terrorist attacks of any sort have taken place in major cities. On page 6, the document refers to the proposed measures as creating a 'safe and secure' environment, but they will not protect us from the more common and more dangerous knife and bomb attacks. The council's proposals are totally disproportionate to the minimal risk of a vehicle-based terrorist attack and not a good use of public money. 2. Right at the beginning of the document, in the second column of page 3, a 'co-ordinated packet of improvements to support Bath city centre recovery' is discussed. The whole piece focuses on the effects of Covid and the importance of helping the economy. This is a totally different issue to security. Again, the next page talks about three major investments the council is planning two of which are totally irrelevant to the city's security. It ends with a statement linking safety and security with the quality of Bath's streets and spaces. Throughout the document safety is linked with qualities such as 'success' and 'opportunities'. Words such as 'welcoming', 'accessible', and 'more spacious' are also used alongside 'safe' to create a positive overall image. This gives the impression that factors other than security may be the main motive for the proposals.	Bath resident Bath resident Bath resident	No No Prefer not to say
Strongly agree	Yes		Yes		Yes		I think keeping Bath a safe city in the context of the world in which we live currently with indiscriminate attacks a real possibility is necessary and entirely sensible. This will always need to be balanced against accessibility for those with disability. Perhaps increasing disability spaces in existing car parks and reducing tariffs might be one way of being able to support this group.		Bath resident	Prefer not to say

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	Totally stupid, in a middle of a pandemic, when the council has reduced income to spend it is unbelievable. A case of trying to bury bad news.	No	You want to turn the centre into a no go area, along with other schemes you will not have any businesses left in Bath.	No	Totally unreasonable.	Abandon this stupid idea pretending it is linked to terrorism. Perhaps if you stopped the Christmas market then there wouldn't so many people on the streets which most people whom live locally would be pleased about. No other city in the UK seems to be worried about terrorism	Stop wasting council tax money, think about the people who don't live in Bath	Bath resident	Prefer not to say
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No	These streets already see minimal traffic. This would massively disrupt traffic flows around the city which is already heavily overburdened. Additionally it would cause considerable harm to residents in those areas, preventing deliveries, visitors and other normal business from taking place.	No	Drop this entire ridiculous idea. Bath is already one of the safest areas in the country, to increase security is nothing more than paranoia induced incompetence.	No	So residents and those working late in the area are not permitted to order food for delivery. Packages deliveries that take place until 8pm normally will not be made and online grocery shopping will be restricted too. This proposal is absurd.	I have a relative that requires a mobility scooter. Bath is already very unfriendly toward the disabled, reducing access to parking will require a significant redressing of the city's pavements causing immense disruption. This is completely unacceptable.	Stop mucking about with our city centre. This entire scheme is a terrible idea. Drop it immediately.	Bath resident Bath resident	No No
Agree	Yes		No	This is not an acceptable proposal for disabled residents who need vehicular access to make use of local shops and services	No	There must be vehicular access for disabled residents who hold a blue badge. Directing them to a car park is not a solution if a person can only walk a limited distance with a walking aid. Please consider incorporating blue badge holders into the number plate recognition proposal allowing up to two cars to be nominated per person. Parking should also be allowed for limited period to allow for appointments to be attended.	Number plate recognition extended to blue badge holders. Parking allowed for limited periods to allow appointments to be attended. Not all disabled people can walk from a car park to where they need to be.	It is a real pity that the city where I and my 90 year old mum live and pay council tax shows such blatant disregard for the needs of their disabled residents. Under this proposal I can't drive to and park anywhere near enough to Boots or Specsavers with her blue badge for her to attend a hearing or sight related appointment. What do you actually expect us to do in these circumstances?	Bath resident	No
Strongly agree	Yes		Yes		Yes			Please take the opportunity to incorporate cycle provisions, i.e. more, decent, cycle racks. Also, of course, aesthetic matters. Black painted correctly detailed bollards preferred over bright red plastic etc.	Bath resident	No
Strongly agree	Yes		Yes		Yes				Daughter of a disabled resident whose postcode is XXXXX	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No	It makes Bath inaccessible for people with mobility problems and makes it impossible for shops who are already closing down.	No	It makes Bath inaccessible for people with mobility problems. How would an elderly person get to their bank? Or the post office? It's already very difficult but this would make it impossible.	No	Lots of people come to bath in the evenings and park on single yellow lines in town. They won't come if they can't come into town. And what should residents do?? Not own a car??	It's already very difficult for disabled and elderly people to get into bath. This will make it impossible. It's already impossible to get to the post office and all the banks if you can't walk very far. Not everyone who has mobility problems has a wheelchair or someone to help them with it. This is a terrible idea. Bath is already very inaccessible.	MAKE THE BUSES CHEAPER! MAKE THE BUSES CHEAPER! MAKE THE BUSES CHEAPER! MAKE THE BUSES CHEAPER! I live in bath and it is cheaper for me to drive into town and pay the expensive parking fees than get the bus. It's cheaper for me to drive my children to school than them getting the bus..... I'd rather get the bus!!!!!!	Bath resident Bath resident Local business	Prefer not to say
Disagree	No	there is nothing wrong with the streets as they are	No	all this is for is so the council can stop all cars entering bath	No	the so called threat to bath has only come to light since the liberas came to power in bath	the only suggestion that i have is where is all the money coming from as the council has a short fall of millions so they say	as covid is about it would be better to look at how to help the people who have lost there jobs & those that are on furlow	Bath resident	No
Agree	Yes		Yes		Yes				Bath resident	No
Disagree	No	-	No	-	No	-	-	-	I live outside Bath but visit the City often	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Neither agree nor disagree	No	How are the disabled people supposed to live independently? Especially if they can not drive to Keynsham etc. Exceptions must be made, eye tests etc can only be postponed for a limited time.	No	Some services must remain accessible say one day a week or at a daily time.	No	No theatres or concerts? Maybe access could be provided and organised for events.	Free taxis to Keynsham? Seriously there is no way life can be reorganised to compensate for what you are proposing to do to many of your disabled residents	Please do not do this. Shops, health professional services, banks etc, concert and festival organisers, after a year of Covid restrictions are not going to be able to survive this.	Bath resident Bath resident	Yes
Neither agree nor disagree	No	As a wheelchair user I am dependent on being able to park centrally. Proposals remove all of the places I use at the moment	No	I use an adapted vehicle to access central Bath at these times. In essence you are stopping me from visiting the place where I live. Restricted access for disabled people are bad enough you are making it so much worse	No	As previously commented I am a disabled person that drives into central Bath and uses disabled parking which you are taking away. You are restricting my access to a city that I live in and feel more and more alienated from	why not allow Blue Badge Holders equal access to delivery vans. You have to have the infrastructure to allow these vehicles through, surely it is possible to extend this to Blue Badge Holders	Whoever has provided input from a disabled persons point of view needs to hold a meeting with disabled people to explain how they feel this impacts the lives of disabled people. The reason disabled space are provided is to minimise the distance mobility restricted people have to walk or propel themselves. This is being ignored. Simply saying spaces are available at Southgate, are you expecting me as a wheelchair user to push all the way uphill to go to shops on Milsom Street. Do you realise how much physical effort this takes? I would suggest you meet me and we will share a wheelchair trip around Bath so i can explain the problems I already face without further restricting my ability to park in town. You state this will cause 'inconvenience' to some people. Do you realise how much of an inconvenience this is. Such an understatement.	Bath resident	Yes
Agree	No	In addition, the south entrance to Southgate Street needs protection too.	Yes		Yes			Please protect the southern entrance to Southgate Street	Bath resident	No
Agree	No	The ever-expanding threat from B&NES council towards the residents of the City and surrounding villages/towns is far more concerning to me. We want access to our streets, it is that simple.	No	Unnecessary curfews to punish the residents paying for these absurd ideas. Do stop using silly excuses like terrorism, Covid or climate change to push through your various planning desires. Be honest with people.	No	see previous and even more preposterous for such periods of quiet.	by retaining and improving the accessibility for all. we need major investment in infrastructure around the periphery of Bath (e.g. linking the A367, A4, M4, major roads outside of the city centre altogether). That would help everyone, rather than just telling local people they're no longer welcome in their own city		Bath resident	Prefer not to say
Strongly disagree	No		No		No				Bath resident	Prefer not to say
Agree	No	Only close these streets during Christmas Market.	No	There is a balance between safety and people living in the centre, especially those in council properties. Disabled Blue badge holders should be allowed to park in their designated areas closest to their homes. With the pandemic rife - deliveries must be allowed to access home addresses.	No	Retail deliveries usually block roads anyway, so should be given a time slot in which to deliver, before rush hour.	Have camera that scan blue badges, like those used by the taxi companies for the bus gates.	Bath city centre is difficult to navigate and slow to most traffic, there are very few places a dangerous vehicle can harm pedestrians. The balance of needs is between the tourists and locals.	Visitor	Yes
Strongly agree	Yes		Yes		Yes			Please use this opportunity to provide more cycle parking (possibly attached to the security bollards) in the city centre. There's nowhere near enough, and none in some places eg Charles Street.	Bath resident	No
Agree	Yes		Yes		Yes			Please be very thoughtful about the choice of design for street furniture, pillars etc. They really do need to be in keeping with Bath. Think of regency lighting, Bath stone etc. Examples over recent years have been very ugly and detrimental.	Visitor Bath resident	No No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Agree	No	Feel that some roads included in this study are there to enforce bath councils desire to have all vehicles out of the town centre	No	Need to have some roads open to allow traffic to pass through the city and not force it onto already busy roads	No	As per previous answer			Bath resident	No
Strongly disagree	No		No		No		I strongly disagree with these proposals. My mother has a blue badge. You are effectively cutting her off from accessing the city centre for essential appointments or to visit her bank etc. This is just a ruse by an anti-car Council to evict cars and the people of Bath from traversing their own City. Shame on you.		Local business Bath resident	No
Agree	No	General Comments 5. The RHA strongly objects to the proposals contained in this consultation. This will severely and adversely impact the ability of road freight to operate in the proposed restricted area to make deliveries and collections. 6. All businesses rely on the delivery and collection of goods to enable them to trade. Without merchandise these businesses will close. 7. It is essential that these businesses have the ability to receive and collect goods, during normal business hours. Deliveries and collections out of hours are more expensive. 8. Everything in a city is delivered by road. All final mile deliveries are by road freight, the power source is irrelevant, roads are the only way to access business premises. 9. As well as businesses, private dwellings will be adversely impacted. Large, heavy items such as construction materials and heavy furniture will not be delivered, without considerable unnecessary administrative burden and additional cost. 10. Much Road freight operates on a just in time basis, the arrangements for deliveries in the restricted area will be unable to take place under these proposals. 11. The current Treat Level is cited as the reason for closing streets. To our knowledge Bath has not been subject to a terrorist attack. St Albans, also a Roman City, was subject to an IRA attack in the city centre in 1991 and has not seen the need to impose similar restrictions. 12. Oxford Street, the UK and London's premier shopping street - and prime terrorist target - also considered similar restrictions on security grounds, these were abandoned when businesses realised the adverse impact this would have on their trade. 13. We have asked for, but have not seen, an Economic Impact Assessment for these measures. 14. We have asked for, but have not seen, an Economic Impact Assessment for these measures. 14. We have asked for, but have not seen, an Economic Impact Assessment for these measures. 14. 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Strongly disagree	No	I don't think.	Yes		Yes		Give emergency access pass.		Bath resident	Prefer not to say
Disagree	No	It's not a practical idea	Yes		Yes			No need to do permanent.	Local business Bath resident Local business	Prefer not to say

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	The current restrictions would not prevent terrorism, a vehicle can currently drive down Cheap Street with the barrier up, the Manchester bomber was one man and a rucksack, and traders and residents will suffer	No	It is not about security, it is about reducing car use, which could be achieved with ANPR cameras and no physical barriers	No	This will mean hundreds of applications to get permission, for example, to have a fridge delivered, will staff have to trawl through all of these while vehicles are waiting to see if they are authorised? Any prospective terrorist only has to order a fridge?	An ANPR system, with blue badge holders and exempt vehicle registration numbers registered would work more efficiently	This is a highly flawed system, which will just add to the difficulty of trading and living in the city, without increasing security.	Bath resident Service provider	Prefer not to say
Agree	Yes		Yes		No			The brochure should have included visuals, especially in respect of concrete blocks which look truly terrible in this historic centre. A key point must be protection of the Abbey/Bath/Pump Room square and the current single bollard on the NE entrance may be insufficient. Also suitable provision must be maintained for access for funeral cars with coffins to reach the abbey main door during the day. Brilliant proposals, and long past their due	Bath resident	No
Strongly agree Agree	Yes No	Generally speaking yes, however, in my experience Westgate St/ Upper Borough Walls are not busy in the evenings and I strongly disagree with these being closed to traffic after 6pm. I take my disabled brother to the theatre and it will be even more difficult to do this if I can't drive past the front door to drop off, and park on Upper Borough Walls.	Yes Yes		Yes No	As above- Westgate St and Upper Borough Walls are not busy during this period and stopping through traffic and parking will be seriously detrimental to those will reduced mobility trying to access the Theatre royal or Little Theatre.			Bath resident Bath resident Local business	No Prefer not to say
Strongly agree Strongly disagree	Yes No	You are killing the access to central Bath especially for people with limited mobility. The latest bomb threats have been via people not in cars	Yes No	If people want to cause trouble they will find a way shutting roads will make no difference if they are determined they will just move their plans elsewhere. You seem determined to make living in Bath hell for residents I hate what Bath is becoming and seriously consider moving. I can't remember the last time I was in town as so difficult to get anywhere with no parking for blue badge holders. I assume all of you on the Council don't have any mobility issues so couldn't care less. You are just interested in money and I bet you get funding from Government if you do these restrictions it's all about money with Bath not consideration for people	Yes No	More security staff on streets	Think about people not money. There will be no opportunities to go to the theatre, cinema, restaurants without parking close by we are just trapped but nobody cares about people just money	Content with the proposals. Have some sole and consider people	Bath resident Bath resident Blue badge holders	No Yes
Agree	No	YOU MUST LEAVE PRIVATE VEHICLE ACCESS AROUND TO THE THEATRE AND BACK ALONG UPPER BOROUGH WALLS, WHATEVER OTHER CHANGES ARE APPROVED.	No	YES, IF AUTHORISED VEHICLES INCLUDES PRIVATE VEHICLES AND TAXIS	No	AGAIN, YES IF PRIVATE VEHICLES ALLOWED	NO MOBILITY SCOOTERS SHOULD BE ALLOWED. REVIEW COULD TAKE PLACE AFTER NATIONAL ASSESSMENTS COMPLETED		Bath resident Bath stakeholder / Community organisation	No
Strongly disagree	No	This will end the City having any businesses that can survive or thrive!	No	I do not agree with current limits. A city centre needs to be accessible to all. I no longer go into Bath or shop in Bath as the chaos surrounding Milsom Street for example means sitting in a jam for a long time. It is no longer possible to nip into town to undertake a task - pop into the bank, pick up something from town etc.	No	The businesses that are open in the evening - bars, restaurants, theatre and cinemas will struggle if people are not able to get near to them to park or be dropped off etc. Having had a recent 12 week period of limited mobility due to an injury to my leg it has been impossible to access the City for anything!	return all streets to how they were before Covid was used as an excuse to ruin to flow through the city	Please stop limiting the use of our streets for residents.	XXX Bath resident	No
Strongly disagree	No	Not required	No	restrictions are not required	No		leave them as they are, Bath does not require these measures.	These measures are designed as yet another car blocking plan using terrorism as an excuse. It will not reassure people that Bath is safe to visit but exactly the opposite the show there is a problem and it will scare people and put them off visiting. It is highly discriminatory to any blue badge holder, unnecessarily removes more parking areas in the town and underlines the Councils message that Bath is not open to visitors or residents who own a car.	Bath resident	No
Disagree	No	Detrimental to business	No	Detrimental to business	Yes			We should not desecrate our beautiful city by over reacting to perceived threat. Certainly protect the Abbey in any way viable. Pedestrianisation kills business.	Bath resident	No
Neither agree nor disagree Disagree	No	Terrorism is at a low level in this country. I am in favour of pedestrianising some streets, but the stated security reason does not make sense.	No	There is no need for increased security. You might make a better argument that restricting vehicle access would improve pedestrian and cyclist amenity, which I would be sympathetic to.	No	as before		Terrorism activity was much higher before the year 2000, so the stated reason for pedestrianising now makes no sense. Is there no case that restricting vehicle access would improve utility for pedestrians?	Bath resident	No
Agree Neither agree nor disagree	Yes No	I would prefer a softer approach with less bollards particularly permanent ones	Yes Yes		Yes No	I would prefer a softer approach with more free evening access		I think the inconvenience to local people will outweigh the benefits. I would like more info ie see a model of Bath showing the proposed restrictions to be able to understand better the consequences	Bath resident Bath resident	No No
Agree	Yes		Yes		Yes		More than 30 places removed, so please allow blue badge parking in Orange Grove, around Guildhall, all of Henry Street and South Parade.	Please choose bollards that are in keeping with the heritage of our city. Could the people vote on 3 or 4 choices?	Bath resident Blue badge holder	Yes
Agree	Yes		Yes		Yes			The council should look at Cannes in the south of France. Their 'bollards' are low level attractive round balls that just look like street decoration/enhancement, i.e. not like great ugly lumps of concrete or black posts. Any vehicle trying to access the pavement in Cannes would be broken up by the balls. Why do bollards and concrete lumps need to be tall and unsightly? Applying a bit of French chic would be a very good idea for a tourist town.	Visitor	No
Neither agree nor disagree	No	Spend the money on providing more shelter for the homeless or the poor	No	Restrict traffic to the city centre this would reduce the risk of attack and pollution you could then re access the stupid clear air zones as in my previous statement	Yes		You shouldn't reduce the blue badge parking	Spend the money on more worthwhile schemes for residents, keep the golf courses open and leisure facilities for the people of Bath not just tourists who don't live here	Bath resident	No
Strongly disagree	No	do you really think this will deter any terrorist threat if a vehicle threat was to take place they would just do it at another location this sounds just like another plan to reduce vehicles in the centre and the resident;s and business owners dererve better than this you dont really live in the real world if you think that doing this would by any way stop an attack guns bombs and knife attacks are the way they do it you could use what they have used in vegas bollard set into the pavement which is what they did after a attack there not by terrorists a waste of time and money	No		No	there is no need to do this at all at any time	yes do not do this at all	well you have out done your selves again with this you should spend a little more time sorting out the issues that have made this city even worse to live in lack of housing more buildings that are harking back to the brutalist architecture of the sixtys services cut making it harder for people to come to shop i do not know what world you all live in but as usual out of touch what is needed in bath	Bath resident Service provider	Prefer not to say
Agree Strongly disagree	Yes No		Yes Yes		No		Parking needs to be available outside of the shops, not a distance away.		Bath resident	Yes
Strongly agree	Yes		Yes		Yes		There is already adequate disabled parking in Southgate Waitrose and other areas of the city, a high proportion of "blue badge" parking is primarily to avoid parking charges in car parks that have disabled access, this is very clear in Waitrose where people park outside and walk further up more steps than if they used the car park	Introduce "red routes" on key streets such as George at and lower end of Walcott street near Waitrose	Bath resident	Prefer not to say
Disagree	No	I think the area covered is too extensive.	No	Whilst it might look good on paper I think this will have a seriously negative effect on people who live in the area and also on businesses. We should be encouraging more residential accommodation in the city centre and whilst I would agree that such accommodation should not come with parking rights it is necessary sometimes to allow parking for shopping, deliveries, visitors with disabilities etc.	No	I agree about business deliveries but home delivery seems too draconian. Will businesses increase delivery charges for night time deliveries? I wouldn't want a washing machine being delivered after dark.	There should be adjustments made to allow not only blue badge holders to have acceptable levels of access but also those who do not qualify for a blue badge but need access to the city centre. If someone lives in the restricted area and needs to go to the hospital but cannot use public transport it seems reasonable to allow them to use a taxi to get there and back.	This seems like a sledgehammer to crack a walnut! I would have preferred to see the three schemes being developed as one scheme to see how they impact each other. Also - I am doubtful that the street furniture will not be detrimental to the World heritage status and concerned about a further increase in street signage which is already excessive in many places.	Bath resident	No
Strongly agree	Yes		No	When I moved to Bath from London in 2017 I couldn't believe how much vehicle access there was to the City Centre. There have to be more restrictions for longer hours. The security proposals are only a start!	Yes		Your consultation should cover it. You can't please all people all the time!	Please keep the security (anti terror) and 'car free' schemes as separate as you can. There's a temptation to roll them into one (& you're doing this). The CTSAs must be a far greater influence on the terrorism measures than the general public.	Bath resident	No
Strongly disagree Strongly disagree	No No	Should be much narrower It might be this is the right conclusion but rushing ahead in the current crisis without greater thought and stakeholder engagement is simply wrong	No No	You are failing to understand the risk involved in this As per previous comment I am not aware of sufficient research and stakeholder engagement. How many disabled residents? How many businesses negatively impacted as can't offer click and collect for example. Needs a more professional approach.	No No	Once again it might be the right answer but insufficient evidence.Need to research, report and engage	Undertake a comprehensive review with full engagement including a public meeting when Covid restrictions sufficiently lifted. This should not be rushed.	Nothing more	Bath resident Bath resident	No No
Strongly disagree	No	This is a sham exercise	No	This is a sham exercise	No	This is a sham exercise	This is a sham exercise	Please be honest with the electorate.	Bath resident	Prefer not to say
Strongly disagree	No		No		No				Bath resident	Prefer not to say

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Agree	No	To me you have not established the nature of the threats. Vehicles are one source but do not require vehicles at all eg suicide bombing, ruck sack bombs, serial knife attacks. The station (bus and train) area is outside the zone by vulnerable to car bombs.		I neither agree or disagree with this because I don't understand the nature of the threats	No	Same as above	This does need expert input. A car adapted for disabilities only gets the occupant so far. After that their mode of travel has to change in some way. I no nothing about what these options generally are.	You are asking people to weigh up an unanalysed and unassessed risk against personal inconvenience. This is impossible for me, and many others, I suggest, to do, so regrettably I think this request for me to complete this survey is unproductive.	Bath resident	No
Strongly agree	Yes		Yes		Yes				Being a 'Bath resident' could mean that I use the city centre once a week or once per day, you have not asked me to say. Why are large people hubs outside the city centre excluded (supermarkets, Bartlett Qtr)	No
Disagree	No	You are preventing reasonable access to our city centre for blue badge holders and those shoppers who may have heavy purchases to take home.	No	Again, this is more of an attempt to make the city centre traffic free than the security reasons given. What you have done to Milano street is particularly bad!	No	If the intention is to increase city centre homes, to cut off vehicular access is a real turn off	You seemed to have lost the plot. The rationale for granting a blue badge is that the owner cannot walk far. To offer blue badge parking bays in car parks is an insult. Some users need to park next to the shop/ business they need to access, they can't go further. You are being discriminatory	I think this whole scheme is a ploy using security as an excuse to pedestrianise the city centre. You will further dissuade visitors, city dwellers and disabled people.	Local business Bath resident	Yes
Strongly disagree	No		No		No		You are discriminating against Blue Badge Holders	Whole thing is nonsense, a waste of money and unnecessary	Bath resident	Yes
Strongly disagree	Yes		No		Yes		It is to be hoped that with the extra space available, pedestrians will have physical segregation from cyclists and e-scooters		Bath resident	Yes
Strongly agree	Yes		Yes		Yes				Bath stakeholder / Community organisation	Prefer not to say
Neither agree nor disagree	No	Logistics UK members have expressed concerns that the road closures will hamper their ability to service residents and businesses based in the city centre and could result in their provision of services being withdrawn, which would damage economically the city centre.	No	Logistics UK members are concerned about access to recover vehicles in the zone after restrictions are imposed at 10am if they suffer a mechanical breakdown whilst within the zone. They question how their recovery vehicles will be able to access the zone to remove the breakdown? Express delivery members disagree with the 24/7 limits on street use as no suitable parking provision for their commercial vehicles has been readily identified to use in place of kerbside delivery. This poses significant load security concerns as vehicles will be left alone for longer as the driver must walk the goods to the delivery location. This new plan does not take into account health and safety concerns for the drivers in terms of manual handling of goods to be delivered that might now need to be transported over much greater distance on foot due to the access restrictions for the vehicle. Will vehicles that are now restricted have access to free parking? If not, this will make Bath a much less attractive location to deliver to and could result in service provision being removed, which would damage the city centre economically.	No	Many of Logistics UK members that operate in the home delivery sector utilise their vehicles as efficiently as possible and this means one vehicle may contain a varied load, with 'white goods' as well as parcels. The proposals to permit large deliveries but prohibit small parcel deliveries will be almost impossible to enforce as the interior of each vehicle would need to be checked. If enforced, it would mean an increase in the number of vehicles that are required for use in Bath city centre to separate large and small items for delivery. This proposal runs counter to the aims of this consultation as it will mean more vehicles entering Bath. Logistics UK members have, again, said that this would render Bath less viable as a delivery location and could see the provision of service reduced or removed that would damage the city centre economically.	N/A	Logistics UK consulted our members that provide transport operations in Bath and we do not agree with the restrictions as proposed in Bath. Their clear message is that these restrictions would make the centre Bath much harder to service, and could see some companies decide to no longer provide transport services in the city.	Logistics UK is the trade body representing freight and logistics operators in the UK	Prefer not to say
Strongly agree	Yes		Yes		Yes		Allow blue badge holders access by number plate recognition (owners can only use a registered vehicle)		Bath resident	No
Strongly agree	No	What about the terrorist with a backpack, as demonstrated in Manchester? or a bike or even a motor bike loaded with explosives. Why have taxis not been allowed, as this is the way that some people shop, (especially if disabled) that is if there are any shops still in business!	No		No		Not enough motorists places for disabled especially now that disabled permits are available to more people.		Bath resident	Yes
Disagree	No	It is essentially the whole core of our city shut off. It is also complicated by the notorious bus gates which prevents access that would be less intrusive were the bus gates removed. Residents will not want to reside here with the problems concerning deliveries. Many people are now relying on online orders and firms will not want the added expense and restrictions of delivering within these areas. Disabled people will be severely limited to accessing the town. Prior to Covid 19 there was already pressure on blue badge parking spaces - even before the wider qualifications allowed. Presently the situation is not reflective of the true scale as like us many disabled people will be shielding unable to access the city hence the closure of many businesses. Also if someone is determined to detonate a bomb they can do so on foot or on a bike. Restrictions could be enforced by CCTV interaction. The loss of Milsom Street and parking near to the Theatre is also far from providing equal opportunities for mental well being. Prohibiting taxis exacerbates access problems. The remaining blue badge parking will not be sufficient. I love the Christmas Market but it will remain a risk when so many are present and temporary barriers have been used successfully anyway in recent years.	No	A shorter timing might help but it would defeat your idea of shutting the centre off.	No	There are functions, societies, entertainment and further education classes that operate in the evenings. Access should be allowed.	There is simply not enough provision. Disabled bays are needed to be larger as hoists are used for mobility scooters etc making even less space for access. Perhaps booking in advance is an idea but relies on technological ability and availability and who can judge how long things will take when you are disabled? Visitors have to be considered also.	Lesser restrictions with barriers that can be used if and when the situation demands more protection would be far better for all concerned. Bring back the police station for a proper presence and deterrent in the city. CCTV observations monitored in conjunction with security.	Bath resident	Yes
Agree	Yes		Yes		Yes				Visitor	No
Neither agree nor disagree	No								Bath resident	
Agree	No	I do not consider that the full length of York St is 'regularly sufficiently crowded' to warrant its closure at the Eastern end by Terrace Walk. The new barriers should be installed just to the East of Kingston Parade/Church St. This would then provide access to about 8 residents/disabled parking spaces on the Eastern part of York St.	Yes		Yes	Recently the use of Lower Borough Walls and Stall St by vehicles collecting food from KFC on Lower Borough Walls and leaving by Stall St and Bath St in the evening has made Stall St a dangerous place to walk. As the streets are emptier in the evening the drivers think it is fine to drive at excessive speeds. The proposed restrictions will remove this hazard.	You must also consider the replacement of Residents Parking spaces that will be lost by the restrictions and no doubt additional Blue Badge spaces that will be provided in areas were residents can currently park. The provision of parking permits for guest of hotels and guest houses in the center needs to be reviewed.	The current closure of the full length of Avon St is excessive. If Kingsmead Sq is to have barriers then they should be half way down Avon St to again allow for residents/Blue Badge parking. Other areas that once had parking spaces (Western end of Bridge St) should have the parking spaces reinstated.	Bath resident	No
Disagree	No	My concern is that blue badge holders will be disadvantaged and marginalised. I will not be able to shop independently in the city centre. Able people can park further out and walk. I cannot unless I have a carer with me to help with my mobility scooter. I want to be independent and park close to shops that I can walk to by myself so I feel more normal and less disabled. Please consider blue badge holders seriously in all your plans for traffic restrictions and make sure enough disabled bays are allocated to any new scheme. I'm also particularly worried about Milsom Street. If I can't get access it will make my life more challenging and reliant on other people.	No	My reasons to the previous question apply. Perhaps blue badge holders could have morning only access for example or ideally complete access like taxis etc	Yes		I don't want to park in a carpark all the time to access shops. I will need a carer and scooter to do this. The purpose of blue badges is to enable disabled people who cannot walk very far to access shops etc independently.		Bath resident	Yes
Agree	Yes		Yes		No	The risk of a vehicle born terrorism attack between these hours does not justify making access difficult for businesses that would result from after hours restrictions. Please refine rules to allow easy access for vehicles for business purposes, not just for large items.	I am in favour of the concept of trams servicing Bath City centre as happens in nearly all Dutch Cities. People would use trams in preference to buses, just link the trams to adequate out of town parking.	Streets such as Cheap Street should be fully paved to encourage pedestrian use.	Bath resident	No
Strongly agree	Yes		Yes		Yes		Blue badges this facility is being abused in Bath cars parked all day in Milsom street?	This is a wonderful idea greater security for pedestrians also ban bikes	Bath resident	No
Strongly disagree	No	Covid has put a huge strain on the city already not just its shops and restaurants but its culture and character has disappeared with the low foot fall with these restrictions being imposed it will stay as a ghost town and lose its character for good	No	See comment before	No	It will discourage even more people to coming to Bath to use its many pubs and restaurants in the evening	Not everyone who requires on street parking is Disabled and has a blue badge. In bad or cold weather people won't be interested in parking at the bottom of town in the car park and walking all the way to the top	I think this proposal is pathetic and terrorism is a lame excuse for the councils poor and disruptive plan maybe the money will be better spent on more public toilets	Visitor	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Neither agree nor disagree	No	Theres no need for permanent bollards along Cheap Street / Westgate street.	Yes	I run a business in the area and am all for closing the roads between 10am and 6pm as during 2020 summer months people could social distance without the worry of vehicles. This created a pleasant atmosphere with no crowding on pavements etc and it meant that restaurants could provide outdoor seating. I was under the impression that the road closures at these times were for social distancing reasons (which I supported) but it seems there was an ulterior motive.	No	Hugely disagree! As I run a small independent business I often check on my premises and rely on being able to park on cheap street / Westgate street in an evening to drop off and pick up heavy stock. This is always on random days so can't be always be planned and it seems very unfair to penalise local business owners and residents who strongly rely on being able to access their properties. I also believe that parking along these roads out of peak hours is a lifeline for the disabled and those less able to walk long distances to access essential items.		Why not pave over the roads to fit in with the area but allow access only during 10am - 6pm and open road to use and park as normal out of these hours.	Local business	No
Agree	No	The streets proposed to be included are not the most busy streets. For example, Pulteney Bridge, an attraction visited by numerous visitors and the access to the city centre for thousands on foot or bike, is far, far more more crowded than several (possibly most) of the streets included in the proposal. Grand Parade also much busier than several of the streets included. There is far more need to reduce traffic access and provide wider safer pavements on Pulteney Bridge than there is to North Parade Road which is shown in the brochure as continuing with widened pavements first introduced as temp measure for pandemic. The number of people at risk on North Parade Road (residents/pedestrians/cyclists) compared to Pulteney Bridge/Great Pulteney Street is tiny. It has previously been suggested nothing can be done on Pulteney Bridge because of fire access - however, if this can be overcome for the city centre areas proposed to be included it is very clear that the previous reasons given against making Pulteney Bridge safer for pedestrians/cyclists (better protecting them from vehicles both hostile and non-hostile) are no longer valid.	No	I am concerned that the proposed arrangements are excessive with regard to provision for those with limited mobility and that this could set an unfortunate precedent. In my opinion there should be a strong presumption in favour of arrangements that are acceptable to those who live in the enclosed area, since the plans are otherwise likely to contribute to the hollowing out of the city centre.	No	It is hard to see how the proposed arrangements are compatible with retaining a thriving community in the city centre. There is both excessive limitation on residents and insufficient limitation on businesses. Should businesses really be required to deliver at night but also have no limitation on delivery times overnight with the accompanying noise disrupting the sleep of residents late at night and early morning? Much higher priority needs to be given to the residents' needs.	It is unfortunate you "are commissioning" a study, rather than deferring carrying out this consultation in the context of a full report of the outcome of the study.	It is essential that the proposals do not result in displacement of traffic to neighbouring residential areas especially the Pulteney Estate area on the other side of Pulteney Bridge. Many parts of the Pulteney Estate typically have far more pedestrian and cyclist traffic than a lot of the roads including in the plans and roads such as Pulteney Bridge, Great Pulteney Street and Laura Place are high profile visitor locations for locations. Therefore under the logic in the consultation these locations are already at equal or greater risk from hostile vehicles than the included streets. They are also more residential. All of these points mean that it would be totally against the aims of the proposals to displace any traffic into this area, and as indicated above the logic and aims of the proposal require that measures are now taken without delay to make Pulteney Bridge safer for pedestrians and cyclists.	Bath resident Bath stakeholder / Community organisation	No
Disagree	No	Disabled drivers will be unable to access large parts of the city centre and their use of restaurants and shops will be unfairly limited	No	We want to encourage people to live in the centre to bring life back to the area other than during shopping hours. If they cannot have home deliveries between the hours of 10am and 6pm this could deter people from living here. Will contractors have access during the day to effect repairs such as boiler breakdowns? It's difficult enough to get British Gas to attend a property	No	I can't see the necessity of closing the streets all night. Terrorists are not going to attack when there are no crowds of people.	I am a city centre resident with a small car, and I pay the Council yearly for a permit. With Covid restrictions in place all next year, please consider us residents who have so few spaces to park in when we return to the Centre. Perhaps we could be given an limited parking places in car parks until the end of the Covid crisis. And for blue badge holders, it is a disaster for them to have convenient on street spaces taken away.	I attended the zoom meeting about the security proposals and thought the ideas for the arrangement of delivery of goods quite unworkable, eg booking 2 weeks ahead with details of vehicle and driver. Also how do disabled people get to the Post Office in Stall St.? As disabled, they probably can't walk far, eg from the designated car parks.	Bath resident	No
Agree	No	Lower B. Walls, York St., Swallow St. and Upper B. Walls are not over used by pedestrians. Stall St. and Westgate St. are.	No	I agree that pedestrians and emergency vehicles should have access, but not cyclists, unless they are WALKING with their bikes on "pedestrian only" places.	No				Bath resident	No
Strongly agree	No	There seems to be a gap in the protection at the intersection of Milsom Street with Old Bond Street/Burton Street. This is vital pedestrian link between Milsom Street and the rest of the City. Bridge Street and Pulteney Bridge also appear to have been overlooked.	Yes		Yes		Please remember to make bollards and street furniture visible to those with partial sight, ensuring good lighting and using reflectives as appropriate.	I'm sure this will be a good step towards a safer City and will improve the environment greatly for pedestrians, aiding the City's recovery.	Bath resident	Yes
							Will the independent pan-disability study also include accessibility considerations for people with severe/ profound learning disability and autism? How many disabled parking spaces are currently within the city center (including on-road spaces) and how many spaces will remain after proposed permanent restrictions? Whilst some on road parking outside of these restricted areas may still be permissible for blue badge parking, what are the distances to be travelled to access the restricted parts of the city center and will movement networks be accessible for all? How will inclusive design access for all considerations be included within transport/movement design and who will be responsible for ensuring that these are built out? How will inclusive design be funded? Could a B&NES website link be provided on town center accessibility information which includes information as relates to disabled parking bay locations and costs, permissible blue badge street parking together with information on drop-off points which are safe and accessible and provide inclusive movement networks into the town center, disabled toilets, identification of changing places, Safe Places scheme etc. Many thanks.		Bath resident	Yes
Agree	No	Bath St's 7 "spaces" are vital for disabled access to the centre of Bath, especially for ourselves in XXX.	No	Disabled access MUST BE RESTORED ! If I could walk from Southgate car park to my disabled access flat in XXX I would not need a blue badge ! Yes, XXX is unaffected, HOWEVER it will become the ONLY dropping off / temporary parking area for the whole area inc blue badge / taxis/ Tesco's/ plumbers etc etc etc and I will never be able to gain reasonable disabled access to my apartment! Already, XXX is clogged up with all manner of vans, inc BANES and shop vans, most displaying "alleged" Blue Badges !	No	Restrict access if needs be, BUT allow " true" residents and at the VERY least immediate residential Blue Badge holders access.	See previous comments. HOWEVER, perhaps an additional " badge / permit" could be used for immediate residential physically disabled...so LEGITIMATE need / usage/ impairment is acknowledged, and third party / delivery van use of " blue badges" (some are parked all day!) are disallowed, including genuine blue badge NON residents if necessary... Be stricter in enforcing use of badges. Be stricter in enforcing the double yellow lines .	Will you also restrict the use of "back packs" as I believe that is how the "Manchester bomber" killed 20+ people? Please be more active preventing " fraudulent " use of blue badges...all day/every day we see "apparent" misuse / abuse of them....and not everyone has "hidden disabilities "!	Bath resident Physically Disabled resident living in XXX	Yes
Strongly disagree	Yes		No	No disabled parking within a reasonable distance of most location which were previously.	Yes		Have system where a disabled badge holders are allowed access.		Bath resident	Yes
Agree	Yes		No	Access should be provided for the disabled on request. Any one of us can suddenly become disabled.	No	Access should be provided on request for the disabled.	I believe that access should be provided on request for blue badge holders. Anyone can suddenly become disabled. Bath has an aging population and failing to provide for those with limited mobility will result in the city centre losing considerable trade at a time when they are already suffering the impact of Covid. Many people will be shopping in other local places with better provision or shopping online.		Bath resident	No
Neither agree nor disagree	No	All disabled and blue badge holders should have easy access and parking provisions close to their homes and anywhere at any time of day. A protected area must stay open for people who live in that area.	No	It is not acceptable to exclude resident parking and parking for blue badge holders. All residents in the protected area will be majorly inconvenienced, especially blue badge holders who may be particularly negatively affected by the proposed changes.	No	see previous comments. Those who live in these streets or need closest access to theatre/cinema or restaurants/shops should not be expected to loose this access. this would be especially detrimental for disabled/elderly population.	would like to see dedicated on street parking and 24/7 access to residents and blue badge holders.If this cannot be honoured there must at least be a shuttle service for blue badge holders that can take them to their chosen destination.		Bath resident	No
Strongly agree	Yes		Yes		Yes		Provide Shopmobility in Charlotte Street carpark and do not have any disabled parking within the city centre. Electric mobility scooters are marvellous and can go a long way.		Bath resident Bath resident	No Prefer not to say

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Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	As a disabled user I rely on access to the city centre to enjoy the roman baths, go to the spa, shop at my favorite small local shops, which I cannot do without being able to park within the centre. Many of the roads are already restricted access and are very tricky to navigate unless you know your way around, which is an advantage to disabled residents. I can meet with my friends and feel less disabled, as I am enebled to use my car nearby to escape when I need to.	No	Please give disabled users access to the same roads that are already open to traffic now. If restrictions are placed, give blue badge users an exemption-central london has a congestion zone that blue badge users can ring in advance to give the plate number of car they are using and if your car is registered disabled, the exemption automatically applies.	No	Bath changes the parking rules so frequently, it is hard to keep up. There are also sufficient wardens about to ask questions, I am certain they would report any suspicious activity.	Difficult to replace blue badge spaces in the centre above the roman baths. The double yellow lines are brilliant for loading/unloading for businesses as well as blue badgers. The blue badges in front of the mineral hospital have also been invaluable. I have always been able to find a space when I need to where I need one. The current proposals cut off a huge part of the city centre I would struggle to access without my van. I have a limited distance I can walk and get exhausted easily. It is so important to be able to plan my visit based on my escape route. I do not feel the terror of terrorism in the city centre and I lived and worked in NYC, London, and Bath-a terrorist will bring destruction if they so choose. Cutting off the city centre will only choke businesses even further than they already are. A street sweepers trolley or pop up food tent w/propane tanks could be just as dangerous as a parked van if either had explosives. Do not waste money changing the roads layout. London is not pedestrianized to prevent terrorism, why should bath be?	Educate businesses in counter terrorism measures-have them be your eyes and ears. Disabled users are much more aware of the road and parking rules and least likely to cause a problem if continued to be allowed to use the small network of roads intertangled throuout the centre of bath-many which are not short cuts, through roads etc. They are there for access.	Bath resident Visitor I have a X shop and am a lecturer during XXX	Yes
Agree Agree	No	The area proposed for protection is quite limited. Why not include, for example, Manvers Street and Dorchester Street, both very full of vehicles and pedestrians?	No	Since access will be controlled by ANPR and permitted for some classes of vehicles, and one of the stated aims is to support the Bath city centre community, access should be permitted for residents of the city centre restricted area using their cars	No	Comment as A5	Greater, perhaps exclusive, use of Broad Street car park for blue badge holders	There has already been a significant reduction in parking space in the centre due to the Covid restrictions which has impacted on city centre residents' ability to find parking space. If this proposal proceeds, residents of the restricted area will be forced to park elsewhere in the Central Controlled Parking Zone. This already has extremely high parking occupancy rates and parking is always difficult for residents. Meter parking in the Central CPZ should be eliminated to give priority to residents. This would also reduce traffic coming into and driving around the central area looking for parking, and so reduce overall traffic volumes and emissions.	Bath resident	No
Agree	Yes		Yes		Yes		The hostile vehicle blocking devices need to blend into Bath historic environment and under no circumstance should they in any way resemble the concrete monstrosities used in Larkhall		Bath resident	No
Disagree	No	The streets proposed, and indeed all other streets, are there to provide access to where people want to go. If you close them there is no point in having them.	No	Precious areas of the city centre should be denied access by vehicles unless specifically authorised, e.g. food deliveries to the Pump Rooms, taxis or worshippers at the Abbey, etc. and denied to all others who would then walk or take a taxi.	No	I was in the Army at the height of "the troubles" and learnt how bombers would place their bombs at any time of the day or night - viz the Europa Hotel.	It is madness to locate the Post Office at the back of an upper floor of an often crowded WH Smith in a pedestrian only area of town. That fact must be self evident to whoever thought of putting it there in the first place!	What similar measures are being taken in Salisbury or Southampton or Winchester?	Bath resident	Yes
Strongly agree Strongly disagree Strongly disagree	Yes No Yes	Need vehicle access daily My general feeling is that the more streets in the centre closed to traffic the better, but because of pollution and our living environment rather than a threat of terrorism.	Yes No No	Its suffocating and controlling I would it to be 24 hours, with exceptions for deliveries and access for people with disabilities.	Yes No Yes	Generally, but please see comment 5.	If other vehicles are removed from the centre it should be easier for them	At least to start with, I suspect some form of enforcement may be needed.	Bath resident Bath resident	No No
Strongly agree	No	Keep the streets open	No		No		There are no alternatives but to allow access especially for julie badge users. Many blue badge users cannot use mobility scooters! My XXX with rheumatoid arthritis would want or be able to use one! It is wrong to use that as an acceptable solution for those who have mobility issues		Bath resident	Prefer not to say
Agree	Yes		Yes		Yes			Where bikes are permitted on roads closed to other vehicles, there needs to be signage warning pedestrians to be alert to them. n/a	Bath resident	No
Neither agree nor disagree Strongly agree Neither agree nor disagree	Yes Yes No	I think the new measures will unduly restrict disabled parking even further than they are at present.	Yes Yes Yes		Yes Yes No	Disabled drivers should have access.	If the measures go through the disabled spaces should be increased on the edge of the zone. It is impossible for the majority of the disabled to access the zone from car parks further away.	The disabled bays outside Waitrose should be extended to take in the double yellow lines and make the whole area for disabled parking only. At present drivers are parking illegally in this area and denying blue badge holders of spaces. The Council in consultation with Waitrose should increase disabled spaces in the Waitrose car park. All suggestions should lead to a better quality of life for residents, businesses and tourists. This will help make the city safer both day and night.	Bath resident Bath resident Bath resident	No No Yes
Strongly agree Strongly agree	Yes Yes		Yes Yes		Yes Yes				Bath resident Bath resident	No No
Strongly agree Agree Strongly agree Strongly disagree	Yes Yes Yes No	I have heard some stupid proposals from banes in my time, but honestly this takes the cake. I've worked in high risk environments with mandatory CPS/security none of them were this Draconian. This is a stupid plan that will do nothing but inconvenience locals and deter visitors.	Yes Yes Yes No	Either this is to prevent terrorism or reduce cars/increase foot traffic if it's the first then no vehicle traffic ever, if it's the latter don't dress it up as security theatre.	Yes Yes Yes No	See previous comments	If security then no vehicles ever allowed in the space, as any could be a bomb, or as a weapon.	Pedestrianise the centre of bath, but don't use counterterrorism as an excuse. Take the understanding that this will kill business in the centre of town.	Bath resident Bath resident	Yes No
Disagree	No	You have sufficiently taken into account the need for disabled access and the support of shopkeepers for deliveries during the working day.	No	What about disabled drivers?	No	We are not a prison	This should be the start point. Until this is done I will not support any measures that restrict access	The council are trying to bulldoze a series of measures against drivers and in this case using the threat of a terrorist attack as the justification. The Police do agree that the threat of an attack in Bath has been raised and this should not be used as an excuse.	Local business Visitor Bath resident	No
Strongly disagree	No		No		No				Bath resident	Yes
Agree	Yes		No	I believe taxis and blue badge vehicles should still be given access	No	I think the increase in online shopping means that courier vehicles will ideally still need access but I recognise that may defeat the overall objective	I think all the council can do is reduce risk, it will never be totally eliminated. I believe the need of disabled drivers to have maintained flexibility on where they park is sufficiently important to allow it to be permitted without significantly increasing the terrorism risk	I think balancing security and accessibility is complex and difficult. I believe the needs of the disabled and infirm need to be weighted more in the decision making process. Many of the other measures being proposed will be sufficient to make Bath a more difficult target compared to elsewhere in the country	Local business Service provider Bath resident	No
Disagree Strongly agree Agree	No Yes Yes		No Yes Yes		No Yes Yes		All good. ensure dropped kerbs are present and/or are not blocked to facilitate use of wheelchairs and mobility scooters	Excellent strategy.	Bath resident Bath resident Bath resident	No No Yes
Strongly agree Strongly disagree	No	Keep centre open to help businesses	No	No need for restrictions	No		Bath belongs to the residents not the Lib Dem council	Next survey should be about Vote of No Confidence in our council and MP XX	Bath resident	Yes
Disagree Strongly agree Strongly disagree	Yes No	This scheme is an underhand way of banning cars from the city centre to the detriment of the local economy and residents/visitors - particularly disabled residents and visitors	Yes No	No not use 'security' as a smokescreen to implement manifesto pledges without proper scrutiny	Yes No		Do not ban blue badge holders and residents from accessing their properties with their vehicles and do not make them request access 20 days in advance that is simply ludicrous!	Stop using COVID and Security as smokescreens for the implementation of ideological manifesto pledges that will damage our city	Local business Service provider Bath resident Bath resident	No No
Strongly disagree	No	These proposals will kill the retail centre of the City.As a resident of Bath I have become more frustrated by the Councils highway policies and now prefer to visit Keynsham and Cribbs Causeway for shopping.The City is no longer welcoming.	No		No				Bath stakeholder / Community organisation Visitor Bath resident	Prefer not to say

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Disagree	No	This draconian action will kill of Bath as a destination for shopping , leisure , eating out and tourism . Where is the justification for this ? Where has this ongoing terrorist threat come from ?	No	This is a city that needs to function . You can't just shut it down like this . This action will directly affect business and tourism . My What's the justification for this - it feels more like a green agenda than a security one - if so say so ? You will have nothing left of Bath if you implement these measures	No	As before		If you want to pursue such a drastic change to the way Bath is then make your proposals very public . It feels like you are trying to push this through discreetly . I only found out about this on face book !! This proposal should be posted directly to every council tax payer in BANES !!	Bath resident Local business	No
Neither agree nor disagree	Yes		No	While broadly acceptable, consideration of people who live in the area has not been given reasonable thought. Deliveries in particular are a problem: I've had multiple failed deliveries under the current restrictions. In addition, the attitude towards disability is unacceptable, and frankly I find it hard to believe legal. You seem to have also forgotten about Age UK, who run their day clubs within the area in which you have banned disability.	No	Similar to the other limitations.	This is your problem to solve, not mine. If you can't find a solution within current plans they must be changed. Excluding a solution and then indicating that you will "solve it later" is unacceptable: it comes across as kicking a serious problem into the long grass and hoping it will go away. It is also not a real consultation if the plans are incomplete.	Current solution (concrete lumps) is ugly, and desperately needs replacing. While the plans as presented imply that this will be fixed, specific details must be put to consultation: I would expect the level of detail in an architectural drawing, i.e. drawings of the replacement bollards, with renderings of them in place so their appropriateness can be judged. Ditto for the cameras. In other words, when you consult with us you should be providing the same level of detail you would expect from us when we apply for planning permission.	Bath resident	No
Strongly agree	No	The prior question is perhaps one of the most lead questions a consultation has ever used, and the people who designed this survey are a disgrace. The police in particular though, is awful, and holds no significant exemptions for disabilities and will greatly harm businesses as they recover from the recession. There seems to be almost no analysis of the direct analysis of the harms it could do, or the likelihood of any benefits.	No		No		Simply scrap the entire concept.		Bath resident	Prefer not to say
Neither agree nor disagree	No	Another layer of bureaucracy to stifle tradespeople, citizens and businesses getting on with their work and life	No	To improve security you need to have a real presence of police and street wardens on the street 24/7	No	AS before - have a police and street warden presence on the streets - a bollard may stop a vehicle but it won't stop a person leaving the vehicle and undertaking hostile acts	Make the city centre accessible	The time and cost of this must far outweigh putting security personnel and encouraging a police presence on the street. A bollard or CCTV cannot break up a fight, control a mob or tackle a lone terrorist	Bath resident Local business	No
Strongly agree	Yes		Yes		Yes		It is essential this work is done, I have been concerned it was not done a number of years ago.	This is essential and all the detractors should be reminded about Nice. Residents should be made more aware of risks of terrorism and role they should take, regular communications needed to keep people aware of risk. As there has not been a major incident recently people are pulled into a false sense of security. Install as soon as possible.	Bath resident	No
Strongly disagree	No	It appears random and without an overall plan. Lack of consultation and an unwillingness to listen to opposing views is such an indictment on this council.	No	Why are you anti-small business? You are killing people's livelihoods, destroying futures with this woke nonsense.	No	Stop limiting people from going about their day-to-day lives. The council seems so anti-business it is a crying shame the town centre is dying.	No on-street parking? Why? How much does it cost to continually pay for outside 'advice' when staff are paid to listen to ratepayers and act accordingly. Very amateur indeed.	I think this council shld be ashamed of itself and its efforts at social engineering. Your job is to fix the street lights, pick up rubbish and keep out of the way of honest citizens going about their daily lives.	Bath resident	Prefer not to say
Strongly disagree	No	There is no evidence that this a credible security issue. It's draconian nonsense.	No	Manage your town centre on the basis of what residents want not what a few over-zealous power-crazed national-based outsiders have dreamed up	No	Security is a bogus issue. There has never been an issue in Bath. You're trying to create an issue that doesn't exist. Manage traffic and access on the basis of pollution, congestion etc but this is nonsense with no evidence to support it	All council and security staff have to park up on Lansdown and walk.	Stand up for local residents, that's your job	Bath resident Local business	No
Strongly agree	Yes		Yes		Yes		Suggest mobility scooters should be restricted - I see no reason why this type of vehicle wouldn't be used as a 'hostile vehicle'.	None.	Bath resident	No
Disagree	No	The "protection" is far too harsh	No	Far too expensive and the council tax payers will end up footing the bill	No	As 5	remove all mobility discrimination from the disabled.	A & S have shown their unwillingness to enforce the law in Bristol against XR - why are they trying to destroy Bath's centre.	Bath resident	No
Disagree	No	If people are going to attack they will just find another way. Like bombing arenas etc. All you are doing is restricting the lives of the innocent	No	Time restriction ain't going to stop someone from hurting others. Town gets busy in the evenings too and several attacks have happened at all sorts of times. Terrorists will just choose a different time.	No		This is yet another attack on disabled people like myself. The council keeps making it more and more difficult. Try being disabled for 3 months yourselves to see how difficult things are already. Drop offs don't work for people like myself because I can't be on my own as I need someone to push the wheelchair and I have seizures. This just seems like an excuse to cut vehicles in Bath full stop by back door methods. Just kill the high street even more. I'm so angry about this. I understand there is a risk of terrorism but if we keep putting restrictions in place they win. Plus this ain't going to stop anything. Like a terrorist is going to give a crap about road restrictions.	Please please be more considerate of disabled residents!!! You have no idea how difficult access is now let alone if you start doing stuff like this. Try living in a wheelchair for 3-6months and getting around Bath, parking etc then make a decision.	Bath resident	Yes
Strongly disagree	No	None of them	Yes		No				Bath resident	No
Strongly disagree	No	Bath is under no threat or the council will do is cause miserable to those residents who live in that area, as well as making it impossible to sell there properties in the future.	No	You have already enough restriction and have already make it hard for blue badge holders to shop in Bath.	No	As I already mention earlier there is enough restriction. Business needs to get vehicles in to stock up and people need to buy. No one what's to get there shopping elsewhere or pay extra to get goods delivery to them. Common sense needs to prevail.	Stop the nonsense you are doing, you will end up making Bath a ghost city.	I have already said early and if the Liberal Democrat what's to remain the main party in control next election then they need to come down from the sky and get there feet on the ground. This concept is complete madness. Bath is under no threat even the police said it is not a priority - London is not doing anything nor should Bath.	Bath resident	Prefer not to say
Strongly disagree	No	this is one of the most stupid things you have come up with if it was going to happen they would just do it somewhere else that is not in a secure zone	No	it is not needed at all they would use other ways to do something or if they were then just do elsewhere in bath	No	stupid idea without merit at all		words fail me another nail in the coffin of bath	Bath resident Local business	No
Disagree	No	There's no way i can walk thru centre without being able to park my mobility car very close to the few shops i visit, Southgate shops have been off limit for me since the shopping centre was built. Only once did i try walking around the shops & even with walking aids i had to cancel my "trip" due to the pain i was in because i had to walk, now you want to ban all cars including for the disabled which will mean I'll never be able to go into Bath city centre again, thankyou soo much for that.	No	The disabled people including myself will no longer be able to shop in the city centre again, I don't want to park my car god knows where & take alternative "transportation" to get to the centre then have to try & visit any shops & then get transport back to my car & then get home, then there's the cost, that's no good to me, provision needs to be made for disabled cars, like vehicle registration recognition that will allow a car thru a barrier, the CCTV could check a central database & know the car is registered, it's such an easy solution.	No	Again it means not just disabled people but ordinary people aswell won't be able to spend an evening in Bath, no way would i get on a bus or have the exorbitant amount a taxi charges in Bath, why should i when i could park my car up around the corner from eg cinema or restaurant or pub, it feels to me the residents of Bath are being punished, oh & let's not forget all the takeaways that will probably go out of business, i go into the city centre about once a fortnight with my granddaughter & we buy a takeaway & sit in the car & eat it, & once a month it's the cinema & just occasionally a pub if we know there's a karaoke, it's great fun, it's my treat for her, won't be able to do any of that either,	I don't have any suggestions, I'm all out, I've explained what my personal plight would be, i can only walk short distances, stand for a very short time, my trips are planned around where there's seating so I can recover from the pain in my back & then i walk to the next place i can sit until i get to my destination, it's exhausting believe me.	I already have made "comments" i strongly disagree with the fact that I'm pretty much banned from half of the centre, you can pretty it up with lots of fancy words but it remains the same, let's face it the centre isn't that big & if Bath wants the revenue from its own citizens not just tourists then think again & make sure we won't be "punished" in whatever is decided, we won't have any say in it, which is also wrong, so make sure you get it right 1st time & not at our expense.	Bath resident	Yes
Agree	No	I don't think you need to take such drastic action as blocking off streets to people who need to park close to the shops i.e disabled, elderly and you need to let deliveries in! It's just going to cause congestion outside your restricted area and make it very difficult for deliveries to shops!	No	As I've just said... Deliveries need to be able to get easy access to shops and disabled people need to be able to park easily and taxis.	No	I would say just leave Bath as it is... There is nothing wrong with it! What about buses?	So you're paying someone who will no doubt cost alot of money (our money!) To work out how not to make it easier for people with disabilities... Like I just said... Why change it... It's got nothing to do with terrorism. You're just using that as an excuse to make everyone's life more restrictive and difficult for no reason! Other than to waste money!	It's a total waste of time. Nothing to do with terrorism measures. We live in Bath. You've put big concrete bollards in the main places that need it... Do not need to bother with any of these Draconian measures in our city. It's a crime!	Bath resident	No
Strongly disagree	No	Yet again you are victimising the motorist	No		No				Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Disagree	No	What proof do we have of "terrorist" activity in Bath city centre streets... simple way for council to close streets down to disabled, delivery drivers etc	No	Do you think disabled people only go out after 6pm- two main streets that give access to parking on single or double yellow lines for close access have been blocked off, it's not always about blue badge spaces- as we know able bodied people park in these all the time, so double and single yellows are important for us, you think that having more spaces in a car parks and temporary blue badge spaces are all good, not when you physically can't push that far, Milsom street, west gate street are now closed, and they provide perfect positioning for disabled people to park on the single/double yellows for up to 3 hours, as the are so close to certain shops- you've "able bodied" the whole of town by just shutting these streets	No	Same reason, do you think disabled people don't go out after 6pm???	Are you actually using disabled people of all different mobility issues, such as independent paraplegics, independent quadriplegics, blind people, cerebral palsy etc, because if you use anyone other than disabled people it won't be a fair study... you need to know that not every disabled person can push 400m, some can only push say 100m but are independent but because you've closed down certain streets, are now unable to be independent because they are unable to park i. The closest proximity possible, ie: single/double yellow lines....	Follow the equalities act 2010 for reasonable adjustments for disabled people..... use us disabled people to actually give you a proper study for accessibility in Bath, not some random independent probably able bodied company	Bath resident Bath resident Bath resident	No No Yes
Strongly disagree	No	No evidence has been provided by BANES that there is a security threat and disabled access is being more and more restricted.	Yes No	Security access is being used as a mask to get rid of parking spaces. Where do disabled people park between these hours? Is there no terrorist threat between 1800 and 1000?	No	As before.	Nonsense.	This is the latest in a long line of lies and mistruths - the CAZ is just there to provide revenue and the anti-car stance of BANES is being pushed through using excuses like Covid and Terrorism. What's been the terrorist threat to Bath between 2001 and 2019 and why has it increased in 2020?	Bath resident	No
Strongly agree	Yes		Yes		Yes		Provide mobility scooters, operable only with some secure device like a RADAR key		Bath resident	No
Strongly agree	Yes		Yes		Yes		Add more		Bath resident	No
Strongly agree	Yes		Yes		Yes		Provide free Blue Badge spaces in other open air or multi story car parks		Bath resident	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	Waste of Public Money	Yes		Yes		Stop Wasting Public Money on Environmental Issues and Pedestrianised streets and start investing it in Local Businesses	Stop Destroying Bath	Bath resident	No
Strongly disagree	No	No access for the disabled.	No	No access for the disabled.	No	No shops open during those times (except for one hour... that's if they open at 9am) for use of the disabled.	So you're disabled but unable to drive a mobility scooter. You may be being brought into the city by another using a blue badge. Not everyone can use a M S, what about the visionary impaired?	It is about time this council looked after its most vulnerable residents. To close roads using the threat of hostile motorists, by which I think you mean, terrorist acts, is appalling. It is obvious to everyone that what your goal is, is to make driving into the City as difficult as possible so you'll encourage more walking and cycling, fine if you're not old or infirm. Don't forget, you lot will be old one day. "Baner. Improving people's lives" unless, of course, you're disabled! Shame on you all!	Bath resident Service provider	Yes
Strongly agree Agree	No	No. You can easily protect the centre without blocking disabled parking spaces. You are discriminating disabled people rather than preventing terrorism.	No	Terrorist attacks happened later than that in most cases. You are discriminating disabled people from using their city. No where else in the country does this and innocent people are being penalised for criminal activity.	No	You have already deleted so many disabled spaces in our city. What is to stop you deleting even more after 6pm? Local residents must feel so let down.	What improvements have you made? You have even vertically lined the only easier area to park I found out today outside the Guildhall! I am FURIOUS about this. You seem to want to pedestrianise at any cost and you are deliberately discriminating disabled parking within our City. I suspect you have got rid of 60 spaces now which must be illegal in a city of this size. No where have I ever seen this! I am disgusted with our council as you did this in the middle of a pandemic when disabled people were suggested to be inside. We come out and cannot visit our city like able bodied people. Disabled people are probably more at risk on public transport. Those electric scooters are every where, on pavements, fast and will cause more dangerous situations to pedestrians than blue badge spaces. What's to stop a terrorist driving at full speed on one of those and doing some damage. I cannot see any efforts at all to give access to blue badges. your priority has been to a casino, taxis, tourist coaches, buses, electric scooters. You deleted so many spaces by the theatre, now all of westgate street, now milsom street, now by the guildhall, where will be next? You even said we can be dropped off and picked up like school children! Newsflash. We like to feel enabled and independent. You are preventing this at all cost! Without consultation apart from this. There is no accessibility or mobility if Bath Council get there way as you are eliminating disabled people from using their shops and their city.	I think I have said it all but I cannot believe that you think this is ok. So many disabled people are feeling discriminated against that I am considering a petition or rally to stop this as it is discrimination and surely cannot be allowed to go ahead. No where else in the country has this in mind and I have written to the MP for disability in Swindon to ask for his advice on the matter.	Bath resident	Yes
Strongly disagree	No	lack of disabled access and parking will leave the city centre totally inaccessible to my son and I who are both disabled. Since new Southgate went in we have been unable to visit this part of town. The proposals will directly affect our quality of life and those of other disabled people. Our ability to use the shops and amenities will be removed leaving us feel further isolated. We both have severe chronic fatigue, the use of mobility scooters is not possible and we have no other family to help us.	No	I suggest allowing disabled access at the least busy times. How will we get our eyes tested at spec savers for example? If is an ableist scheme	No	You are creating a atmosphere of fear and exclusion.	I think it is immoral to remove disabled access and parking and provide no alternative. I am very angry. I have a mobility scooter but by the time I've got it out of my car to use I'm too exhausted to shop. Parking outside shops is essential for me and my son and others in our position.	I would like to know when the disabled assesment will be take place? Will it be before the decision is taken or after the event? How will I have access to this particular report and how will I comment on its findings.	Bath resident	Yes
Agree	Yes		Yes		Yes			My concerns are that escooters will be allowed on these pedestrianised roads. At speed they are more dangerous to pedestrians than cars and accidents are bound to happen.	Bath resident	No
Disagree	No	Please consider the disabled and elderly, permanently blocking these streets have a detrimental impact on a large proportion of the residents in Bath. You seem to have more consideration to visitors rather than residents.	No	Blue badge holders and disabled should always be allowed access to the centre. It is totally unacceptable to exclude this group of people from participating in the life of our community. I have lived in Bath all of my life and have never felt my disability more.	No	Where do locals park?	There is no mention of the loss of parking on single yellow lines in the city centre. As well as the 30 'removed' spaces there are 8-10 in York Street, 3 in Lower Borough Walls, Queen Square, Milsom St etc so potentially another 50+ spaces not included. This seems an excuse to close off Bath completely. Are any of the 'panel' disabled so that they can only walk a few yards before being in absolute pain? Bath's pavements are very rickety and uneven so it's impossible for me to access Stall St, Milsom St, Westgate St. My optician is in the centre, I've been with them 43 years and now I can't access them, my life has been severely impacted by these restrictions and I am very depressed by it. Can you not allow local blue badge owners access? The bus gate is bad enough as I have to drive an excessive distance to access both sides of Bath. I will be considering legal action if this goes ahead.		Bath resident	Yes
Strongly agree Agree	Yes Yes		Yes No	11am-4pm	No	When are disabled people going to be allowed to enjoy coming to town.	There must be more spaces for blue badge holders that make a visit to the city convenient and enjoyable. I have spoken throughout as a disabled driver, so please review my previous comments.	I am not sure that the retailers are going to be happy, so more public transport and Park and Ride capacity needs to be in place.	Bath resident	No
Agree	No	I do not disagree with the streets that you have designated to be included in the protected area, BUT what I do object to is that, once through the 'gate' before 1000am one cannot continue to park after 1000am. If my car is not a terror threat before 1000 then surely I should be allowed time to shop (I am thinking particularly of Milsom Street now). I have a blue badge, without which I could never shop in Bath, and disabled people need time to get from shop to shop, and even to get around just one shop. Also, I fear that we shall lose even more good shops because of lack of footfall. Disabled people seem to have had very little consideration given to them during Council's deliberations. Please reconsider.	No	Please see my remarks at No. 3 above. All my remarks are written as a disabled driver who cannot use buses, cycle or walk, so I cannot agree to your plans unless allowances are made for Blue Badge holders to be allowed through - or, at least, to park after 1000am. I reiterate my comment that having been allowed through before 1000, and with a Blue Badge, surely one should be allowed to continue to park.	No	What about social activity? Theatre/Cinema/Restaurants. Bath will become a dead City with what the Council is considering. If the Council is intent on closing the City Centre roads in this way I don't have any suggestions. Those who are lucky enough to be able to use buses, ride bikes or walk are the only people who will be able to continue to use the City Centre, either at day or night. My only (selfish) suggestion again is that perhaps you could devise some system whereby disabled badge holders could have access during the evening.		I have no other comments, except a plea for consideration of those of us who cannot walk any distance - or with any speed to beat the 1000am cut-off. I am sorry for my intransigence on this, but being able to drive, do what I need (and indeed want) to do, thus keeping my independence, is important to me - as I am sure it is to all other disabled drivers.	Bath resident	Yes
Neither agree nor disagree Strongly agree	Yes	This still leaves streets such as Dorchester Street unprotected	Yes		Yes		Increase use of the Broad Street car park for blue badge holders	This is good, but need to reduce traffic in George Street, Manvers Street and Dorchester Street	Bath resident	No
Disagree	No	The justification for all these draconian restrictions is vague but appears to be that in the past terrorists have used vehicles as weapons in crowded areas. This begs several questions: Why this crowded area? There are many other city centres which attract crowds is the intention to lock them all down? There are other areas of Bath and BANES which attract crowds can we expect these restrictions to spread?	No	The council seems to have given no consideration to helping or compensating residents at all and have only recently started to look at ways of helping even severely disabled residents. The current proposal leave disabled visitors a long way from the most popular shops. Some example of where we believe BANES should be looking to support residents include: Turning the proposed system for booking deliveries and trade visits on its head. Rather than leaving residents between the rock of an opaque bureaucratic permit process and the notoriously inflexible booking processes of major companies and harassed small traders, residents should be able to contact council officers explain what they need and why they need it and have the council contact the companies concerned gather the information they need and make the arrangements for access. Given the consistent failure of both central government and BANES to provide adequate affordable public transport a car is still essential for many city centre residents. We have already seen a considerable reduction in parking provision and these proposals will add to that. It is time that BANES acknowledged this reality and allocated "residents only" all-day parking in city centre car parks for residents in the area covered by these and other proposals to remove parking spaces. We are advised that these proposals are likely to have an impact on property values in this area and we think that resident thus affected are entitled to get compensated.	No	The council seems to have given no consideration to helping or compensating residents at all and have only recently started to look at ways of helping even severely disabled residents. The current proposal leave disabled visitors a long way from the most popular shops. Some example of where we believe BANES should be looking to support residents include: Turning the proposed system for booking deliveries and trade visits on its head. Rather than leaving residents between the rock of an opaque bureaucratic permit process and the notoriously inflexible booking processes of major companies and harassed small traders, residents should be able to contact council officers explain what they need and why they need it and have the council contact the companies concerned gather the information they need and make the arrangements for access. Given the consistent failure of both central government and BANES to provide adequate affordable public transport a car is still essential for many city centre residents. We have already seen a considerable reduction in parking provision and these proposals will add to that. It is time that BANES acknowledged this reality and allocated "residents only" all-day parking in city centre car parks for residents in the area covered by these and other proposals to remove parking spaces. We are advised that these proposals are likely to have an impact on property values in this area and we think that resident thus affected are entitled to get compensated.			Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath stakeholder / Community organisation Visitor I work in the city and I represent a B&NES Ward in the city	Yes

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly agree	Yes		No	Increased on-street dining & drinking during Summer months - may need to consider extending past 6pm to protect people in street cafes/bars	Yes					
Strongly agree	Yes		No	It should start from 9am	No	should be 9am not 10am	The loss of available Blue Badge Parking will discourage some people from coming into Bath.		Bath stakeholder / Community organisation	Yes
Disagree	Agree		No	Many shops do not open before 10am so disabled customers are locked out. How can one access a disabled parking space in Quiet St and New Bond st. if Milsom St is closed?	No	So no access for restaurants, theatre, bank cashpoints.	By the time this study is complete most disabled people will have given up on Bath city centre and disabled visitors will feel unwelcome. A lot of buildings are difficult to access with a scooter or wheel chair so some of us try to keep walking with aids but distances you are expecting us to manage are unrealistic.	A study is a waste of our money. Perhaps Councillor in charge should spend a day or two in a wheelchair and find out first hand what it is like being so restricted but trying keep some level of independence.	Bath resident	Yes
Strongly disagree	No	No access for disabled visitors and residents to access services and shops.	No		No					
Agree	No	There are too many. Basically if you have any mobility problems the city centre is now a no-go area.	Yes		Yes		Please be aware it is not just about blue-badge holders. With 100s people waiting for hip and knee replacements for up to two years now how are you supposed to use the shops? I was incapacitated for almost a year, not allowed a blue-badge because it isn't a permanent disability, and literally wept more than once trying to get from Kingsmead Car park to Specsavers. In the end I had to stop going to town. Do you really want to stop a significant number of Bath people getting to the shops?	The Green agenda and security against attack is one thing, but the social distancing measures are another - please get rid of them as soon as possible as they create more problems than they solve.	Bath resident	Yes
Disagree	No	I do not agree as you are restricting access to a large number of area / shops for disabled member of the Bath community. Surely there is a solution that would stop vehicles accessing these areas and make them secure whilst allowing blue badge holders to drive and park next to shops and services they need to access.	No	Again, this is because it is a blanket ban across all vehicles. It makes no consideration of disabled people / disabled blue badge holders who need to access shops and services in these areas. It is fine saying you have provided other places for these people to park, but these can be much further away from the places people need to access who cannot walk or make these distances. I fee this is discriminatory against disabled people.	No	At present they are ok, but if vehicle access is restricted between these times then I feel it is the same as previous comments and discriminatory against disabled members of the Bath resident population.	To allow blue badge holders access to these roads rather than implementing a blanket ban. This could be done via an intercom system similar to the one to access stall street from lower borough walls. Or use an ANPR system where registration plates are registered against blue badge serial numbers similar to the system implemented at the RUH car parks.	I feel there should be more consultation with the disabled community in Bath before a decision should be made. Again it seems like the local council pushing through a decision they have wanted to make for many years and using the cover of 'COVID restrictions' and 'Security Reasons' to make it happen.	Bath resident Bath stakeholder / Community organisation	Yes
Neither agree nor disagree	No	Some elderly and disabled need to access these areas and to close these to disabled and taxis is wrong	No	should be access for taxis	No	should be access for disabled and taxis		should not be closed to taxis	Blue Badge driver Bath resident Local business	No
Strongly disagree	No	The last hostile vehicles to visit Bath were German planes! There is no threat. This is just a scam!	No	These measures are not necessary.	No	Not necessary.	Open the streets and let them park.	Be honest with us and say what your true objectives are.	Service provider Bath resident	No
Strongly disagree	No	It's rubbish for us Blue Badge holders look at the map of closures and the amount of parking for disabled people complete rubbish. I guess none of you are disabled so you don't care.	No	It limits shopping and banking, for people and access to the theatre. I haven't been into the centre since June as it's all too difficult I use Trowbridge for shopping now who are much more friendly than money grabbing Bath	No	Look again who is using the city as nothing to go into Bath for parking expensive shops are closing proposed entry charges will put the final straw on it. Stop being so money grabbing Bath	You say you recognise the problem for accessibility for Blue Badge holders but you don't it's just words without action you don't care	You are ruining Bath and eventually will kill the city entirely think about people living here not just the students. If you do these things you need to provide decent park and ride and buses that go where people want to go at affordable prices first not years afterwards when everyone has given up on Bath. At present very few bus services go down Milsom Street anywhere near Westgate Street this is important when you have shopping to carry also access to Victoria Park and other open areas important when with limited mobility and no car to be able to enjoy the parks is lovely	Bath resident	Yes
Disagree	No	Far more disabled parking and access required. My late father used to love going to Bath and being part of the city and amongst the throng of people for a day. It helped him get some respite from being stuck at home. If he were alive now, he would struggle to get a space to be able to do that.	No	What is the point of a disabled bay in the city centre that is restricted after 10am??	Yes	As long as the disabled bays aren't time restricted whatsoever	Looking at the map there is simply not enough disabled access close to the shops and so much of it is time restricted. Please allow people who can only walk 50 - 100m at a time keep their independence and dignity by allowing them respite through access to their local city. Time restricted disabled bays are not good enough, neither is the number of overall disabled bays.	Think what effect this will have on the people who have spent almost the whole of 2020 stuck indoors. When they come out of the pandemic, they'll discover their livelihood is being marred because they can no longer face the battle for a disabled space nor a longer walk to get around the city. My late father loved his trips to Bath and would be utterly miserable if he saw these plans stopping him from being independent.	Bath resident	Prefer not to say
Strongly disagree	No	This is absolute nonsense, are all councils throughout England doing this?	No	Your killing business in Bath.	No	Isn't this the exact same question as the previous one?	Have you consulted any business about this, not just blue badge holders?	Please stop destroying Bath. You've only been "in power" for a couple of months and so far everything you've done has been to the detriment of Bath and its residents.	Bath resident Local business	No
Strongly Agree	Yes		No	Should be 24 hours in high risk areas of the town.	Yes		Please make Southgate carpark free for Blue badge holders for upto three/hours, within the rules of the badge.	Milsom St should allow access for Blue badge holders, so we can access shops easier.	Bath resident	Yes
Agree	Yes		Yes	But more details needed on how affected residents would have deliveries made during the day (given that many delivery services do not offer specified time slots and/or evening deliveries). This would be particularly pertinent in the event of another pandemic, which is not entirely unlikely, given the increasing human infringement on wildlife habitats and the resulting crossovers of viruses. Residents would need to be able to have shopping delivered to their door if self-isolating. Aside from pandemic conditions though, there may be residents whose mobility does not allow them to click and collect and depend on home deliveries, so this factor should be included in the study on accessibility.	No	Want to say yes, but not sure how practical this is. How many white goods (or similar sized items) delivery services are even available after 6pm?			Bath resident	No
Strongly agree	Yes		Yes		Yes			Brilliant for the city. Good car free public realm will further enhance what is already a beautiful city	Bath resident Local business Local business	No
Agree	Yes		Yes		No	We need to have vehicle access for deliveries and collections from Sawclose by private car, Taxi as well as commercial vehicles. There must be sufficient loading and unloading bays provided in the Sawclose area. Currently there is only a short bay that is available which is insufficient.				No
Strongly disagree	No		No		No				Bath resident Local business	No
Strongly agree	Yes		Yes		Yes			As a retired but active non-car owner who lives in the city centre (and hates the concrete bollards) I think these proposals are excellent and have my full support and gratitude.	Service provider Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly agree	Yes		Yes		Yes		Prohibit e scooters from the pedestrian area	Will the CCTV be used for crowd surveillance by the police?	Bath resident	No
Strongly disagree	No	Not disabled friendly	No	Return police to Bath	No	Return police to Bath	Need to be able to park within 20 m of where they want to go		Bath resident	Yes
Agree	Yes		Yes	Will access to Bath Abbey for hearses and wedding cars be permitted?	Yes		No suggestions, but strongly endorse the need for improvement and/or scheme mitigation for those with limited mobility.		Bath resident Bath stakeholder / Community organisation	No
Strongly agree	Yes	To be honest, a map would have been more useful as a link than just the street names	Yes	I am assuming that none of the affected streets are bus routes, If they are, have the needs of bus users been considered	Yes		How far reaching will the pan disability study be? Are there other examples of cities with no provision of any on street parking within a protected area? I can understand how this will be seen as a contentious issue for many, but if we are to make the protected area as secure as possible, it appears to be the only option	What is the scope for reviewing these new restrictions once they are in place? Are they only relevant for a specific period of time before they are reviewed? How does the current coach drop off facility on Bog Island fit within this proposal; is it outside of the protected area?	Bath resident	No
Strongly agree	Yes		Yes		Yes			The proposed changes will be a win win. Making the city safer while making it easier and more pleasant to move around as a pedestrian or cycle user.	Bath resident	No
Strongly agree										

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	The proposal is hysterical. The actual threat of terrorism is minimal and the language used to describe your proposal creates an atmosphere of paranoia and xenophobia totally at odds with the cultural heritage of Bath.	No		No			You assert "As the threat to the United Kingdom from terrorism remains." but give no evidence to support the existence of this threat. This proposal is totally ridiculous. So called "terrorist threats" are almost non-existent and these measures waste money and inconvenience our lives. I would like you to give an example of an actual terrorist incident that took place in the UK within the last few years that these measures would prevent were it to happen in Bath. Furthermore, even I were to accept the potential threat, these measures don't protect areas with large numbers of people wandering around: the train station, the bus station, hospitals, the rugby club, the universities, etc. All this does is help create an atmosphere of fear and suspicion. Ironically I actually support the pedestrianization of streets during the day as it helps make a safe environment for walkers. But I refuse to support your measures when they are pushed under the rhetoric of so-called anti-terror when you and the national government have failed to make the case for the existence of such threats.	Bath resident	No
Strongly disagree	No		Yes		Yes					Yes
Disagree	No	Hostile vehicle? Are you serious? You have ludicrously weak risk assessments for shared spaces but now you want robust street furniture on other streets. Do you grasp how stupid this sounds?	Yes		No		Get a grip on what you're combating, Bath is not a war zone.	It's very good these schemes but we haven't got a police force in Bath to enforce any of this Happy with pedestrianisation but please assess the risk properly. The likelihood of attack is so low, it does not justify spending my hard earned council tax.	Bath resident Bath resident	Yes Prefer not to say
Strongly agree	Yes		Yes		Yes		Car Parks should again offer free blue badge parking.	Allow deliveries from 6am to 10am .	Bath resident	No
Strongly agree	Yes		Yes		Yes			I would propose restrictions going later into the evening. Several terrorist attacks have occurred at night. Please think again and don't make Bath more of a no go area than it already is	Local business Bath resident Bath resident	No Yes
Neither agree nor disagree	No	As a blue badge holder I am already scared to drive into city shops in case I get stuck. What provision if any will be made for us as there are many others like me who cannot walk far enough to access public transport or carry shopping. who thinks we can all ride a bike, this is a big joke	No	Allow blue badge holders to access at all times	No	Its the blue badge holders who will suffer and so will the shops who cant afford more rules .	Surely you cannot ignore the disabled or are we meant never to go shopping. Your will push us to supermarkets only and the local shops can be forgotten			No
Agree	Yes		Yes		Yes		As I normally visit Bath on foot or by cycle, the proposed changes will be an improvement for me. This may change if I lose my mobility as I get older, but I cannot think of any sensible improvements.		Bath resident	No
Strongly disagree	No	The proposed restrictions on a range of vehicle access requirements are too limiting. Is there any evidence of terrorist plots that would suggest such measures, or is this just another restriction on vehicle access which will limit business operation, once the present emergency is over?	Yes	Inconvenient but probably bearable	No	Suggest restrictions between these times are unnecessary	Do not impose these restrictions	These latest proposals for restricting traffic in the centre of Bath ostensibly on the grounds of counter terrorism are excessive and will hinder business recovery. Are they really being seen by the Council as a further step in its attack on drivers, on top of the current largely unnecessary restrictions for COVID? Is there any real evidence of risk to justify the serious limitations being proposed? The Council and Police are supposed to be working on behalf of the public, not making life ever more difficult when things are bad enough already. XXXX	Bath resident	No
Strongly agree	Yes		Yes		Yes			Benefits: Increased security, social distancing & cleaner air. Please expedite asap.	Bath resident	No
Strongly agree	Yes		Yes		Yes		Reliable security means that everyone, including the disabled, will have to make some sacrifices around the convenience of access. Wherever possible, the disabled should have their share of parking spaces closest to the security zone.			
Strongly agree	Yes		Yes		Yes		We need some small electric buses to help people move across and around the city between car parks please!	Kingsmead Sq is vulnerable - especially where it meets 7 dials - can we have better bollards there please?	Bath resident	No
Agree	Yes		No	For residence in restricted areas allowance should be made for food deliveries and repair and maintenance personnel and their associated vehicles.	No	You must balance the needs of people who live in restricted area with the very minimal threat level, to cut the access for residence in their homes will result in it becoming a ghost area.	You are in effect trying to force out of the area all disabled and elderly residents, these measures will eventually kill Bath City centre.	This is a back door move to remove all vehicles from Bath without providing any alternative for parking or bypass of traffic.	Bath stakeholder / Community organisation Bath resident	No
Strongly agree	Yes		Yes		Yes		More cycle parking in the restricted areas. Some have been removed in recent years and never replaced - the ones that spring to mind were the ones on York Street		work in the city in the restricted areas	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No	I work for XXX, these proposals will make it more difficult for me to collect food and to deliver food to customers. Terrorists will more likely target London or other major cities not Bath. This might put hundreds of drivers out of a job.	No	Deliveries should be allowed during these times.	No			Please allow car and motorbike deliveries and collections from the city centre for Deliveroo, Amazon and all other delivery companies. Deliveries are on the rise with COVID-19 people not wanting to go out and want food delivered.	Service provider Service provider	No
Disagree	No	As a taxi driver it will restrict my business I will not be able to drop customers off at businesses homes and hotels the customers could be disabled and might not be able to walk that far I have already got one regular customer who suffers from pulmonary hypertension and finds it difficult to get to her pharmacist on Westgate Street	No	As a taxi driver a lot of my customers will need transportation during these times Maybe the simplest solution would be to allow taxis through during these times	No	As a taxi driver a lot of my customers use taxis between these times to get to businesses hotels et cetera in these to be restricted areas may be the simplest solution from my point of view would be to allow Bath and North East Somerset taxis in these areas to work	I think the best and easiest solution would be to allow disabled drivers with blue badges access	As a Banes taxi driver it would be beneficial to my business and my customers a few who are disabled if I was allowed access to the roads you were thinking of closing part time	Bath resident Service provider	No
Disagree	No	As a taxi driver you are restricting the places businesses homes that I can drop my customers at	No		No					
Strongly disagree	No	As you all know, there are very many vulnerable individuals with mobility issues in the city that will not have access anymore to services and businesses around and within the proposed area. It seems like the Council is looking to exclude everyone that cannot walk or cycle from the city centre. Consider this: all of us will get old and decrepit enough to the extent that walking even for a modest distance of let's say 50 yards might become painful, dangerous and/or impossible, then you will much appreciate to be able to be dropped off by a nice and helpful taxi driver just outside Specsavers on Westgate Street, or outside your favourite pub in the Abbey's Green, or perhaps as a senior citizen visiting Bath you may like to not have to carry your heavy bags to the Zed hotel, 'cause the taxi will drop you quite far.	No		No	Any sort of restrictions will affect businesses and vulnerable individuals that won't be able to access them.	Not everyone with a mobility issue has or is able to use a mobility scooter. You are about to exclude a lot of residents and potential visitors in that situation from accessing the proposed area. Think carefully, as life is a one-way journey, you may find yourself cursing the bright minds that made it inaccessible for you to get in some place or another.	As a touristic economy, Bath should look forward to look open, inviting, to avoid the siege mentality. Any updates to the current infrastructure should be including, not excluding. The Council would better focus on the traffic to move better and faster, instead of slower and worse.	Service provider	No
Disagree	No	Orange grove pavements are already wide enough also you are preventing XX TAXI from doing their jobs getting people with disabilities close to the banks and shops they need, its bad enough with mislabeled streets closed to taxis.	No	All main streets should be open to local taxi/ PH drivers	No	Again you are stopping drivers from delivering goods to the public at the times they can be in, ie some work days, some work nights	Disability cars be it private or taxi trade should have access to most streets	I believe the council are doing all they can to destroy the taxi trade in fact all trade in our city, you are making The City of Bath a ghost town	Local business Service provider	No
Strongly disagree	No	There should be none of these kinds of protections imposed on any streets. The whole scheme is preposterous.	No	The limitations are a disproportionately high inconvenience for all City users and residents, with minimal gain. In the unlikely event of a terrorist attack, the perpetrators will find one of many means to circumvent these minor physical obstacles.	No	As a cyclist, I'd like you to think about the fact that I have to go around the existing barriers which means using the pavements. Take a look at the barriers and pretend you're a cyclist, and have a think about this simple problem domain.	Make a commitment that all City centre residents, employees, visitors, tourists, etc can get a blue badge car in and find a space near their destination. Then make this happen.	As the decision maker for a company which is trying to grow, currently located in the area you are trying to effectively sterilise, I have decided to shut down the three offices we currently have and move away. The dozen or so people affected have been forewarned that we would embark on consultations concerning this proposed move - these will start today, Thursday 19th November with a proposed move date in the second half of March 2021. Bath central is no longer a viable location for business, which is a sad state of affairs. I hope - but do not expect - this to change in the next few years. Very sad.	Bath resident Local business Service provider	No
Neither agree nor disagree	No	I commenting as a taxi driver. These new proposals are far too restrictive. Taxis should be allowed in the areas mentioned. People do live there and some are disabled. I can foresee public disapproval	No	Taxis should be exempt. We are secure and safe.	No	Again taxis should be exempt.	Disabled people should have unlimited access	I repeat what I have already said. Taxi drivers should have unlimited access. Otherwise our income will be restricted. And that is unlawful.	Bath resident	No
Strongly disagree	No	Jobs worth decision not based on common sense. Fed up with stupid and downright idiotic decisions being made for no good reason. Just living in cuckoo land!	No	Sorry, just so horrified at overall mess being made in wonderful Bath that I won't agree to any proposals. Cannot do it.	No	Same as before. Not that this will make any difference to anyone reading my comments. Nobody listens. Extraordinary and dangerous decisions have been made and we can do nothing to stop them. Dictatorship.	Getting fed up. 'If it ain't broke, don't fix it' but you will. Just to prove your worth. Not seeing the real picture at all. For every person you are so say making things better, you will be adversely affecting 10 times that number and for what? Just to justify your roles. Please stop it.	I mourn for our beautiful city that is slowly being killed because of crazy decisions. Bus station is one example, London Road another and beyond belief the pedestrian crossing by Julian Road / Guinea Lane on Lansdown. Mad and dangerous. I am waiting for the next lunatic decision to manifest itself. Next you will probably make Broad Street two way!!! Also I, and many others like me, feel powerless and totally ignored. I also don't think anything said here will make a blind bit of difference.	Taxi driver. Bath resident	No
Disagree	No	These proposals are not proportional to the current risk level.	No	Draconian and not proportional to current risk	No			These proposals are like something from a police state. Where is the evidence of terrorist risk that justifies these quite draconian restrictions? If the risk level changes then by all means take appropriate measures, but not until justified by the risk.	Bath resident	No
Strongly disagree	No		No	The	No			What a waste of resources. Get trade back into Bath. All the bollards do is move the site - a possible attack to another site, not eradicate it. Make Bath welcoming to all users.	Bath resident	Yes
Strongly agree	Yes		Yes		Yes				Bath resident	No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly disagree	No	There is no evidence that terrorism is a real or increasing threat to the people of Bath. Imposing draconian measures in response to a problem that doesn't exist is government at it's worst. Causing real harm, discomfort and inconvenience to old, vulnerable people and city centre residents in response to a phantom menace is not the way to proceed. Neither is putting the right of people to proceed freely about their business in the hands of untrained private security agents. I also doubt that these measures would stand up to a properly concerted legal challenge based on the undeniably discriminatory and intrusive nature of them.	No	None required, apart from encouragement of a just and inclusive society.	No	See above	See above, or failing that exempt blue badge holders and taxis from the scheme	https://www.statista.com/statistics/539190/incidences-of-terrorism-united-kingdom/ As you can see from the above, there is no data to support the idea that the Bath or the UK in general is suffering from any kind of increasing or existential threat from terrorism. The real threat is actually to the ability of ordinary people to go about their legal business, delegation of power to quasi-official and poorly monitored "security agents". As I have stated above, these measures are repressive, discriminatory and unjustifiable given the present level of threat. It seems that A) the current COVID-19 crisis has made the urban planning department a little dizzy, and B) someone has spent too much time locked up in a small room with policemen. I wouldn't disagree with a general intent to make city streets more pedestrian friendly and car unfriendly, but these needs to be rooted in a desire to make the city welcoming and hospitable for all, not from a starting point of befuddled paranoia. You should be looking to replace city centre vehicle traffic with low speed electric vehicles, tuk tuks or rickshaws as part of a properly thought out and holistic approach which may include a proportional security element. This stuff here is just madness.	Bath resident Local business	Yes
Disagree	No	Access should be allowed for locally BANES licensed Taxis and private hire vehicles who are often required to pick up/drop off elderly and disabled people throughout the city center, many of them would struggle to walk to a meeting point outside the protected area. Also it looks from the diagram that the taxi rank at orange grove would be affected	No	as per my previous statement	No	as per my previous statement	Banes licensed taxis and private hire drivers are vigorously checked by the Banes licensing department and are constantly being checked through the government DBS scheme, so do not present a security threat, licensed taxis and private hire vehicles are not considered a threat to security at airports and railway stations throughout the UK so should not be considered a security risk in Bath. They are essential part of the local transport system		Local business	Prefer not to say
Strongly disagree Strongly disagree	No No	If you would like to block you can block unknown cars not taxis and buses and food deliveries	No	Restrictions should be made for private cars not taxis or buses or deliveries as we are part of servicing public transport	No	Should be made for private cars not taxis or buses or deliveries as they are serving the people	Private cars shouldn't be allowed in the city centre if you afraid of any attack but taxi and buses all been checked by the police and council		Bath resident Local business Service provider Visitor	No
Strongly disagree	Yes		Yes		No	Private hire and hackney carriage, provide transport service. You destroy the bussines. Its ok for personal cars, but you neee ti allowed cars licensed by BANES		Its ok, but let private hire, hackney carriage and delivery car to use this roads. Are alot of people need transport and delivery, door to door because they can't move.	Local business Service provider	No
Disagree Agree	No Yes		Yes Yes		No No	will the evenings see higher demand for vehicle access due to suppressed demand during the day and if so how will the evening economy be affected? Business and residents will have to adapt.	no comment	I am responding as a resident but as a XXXXXX the degree of security achieved will only be as strong as the "human factors" relating to the CCTV control room and ensuring the personnel are adequately trained and resourced. Has the revenue cost to achieve this been properly assessed through learning from other authorities such as Cardiff? XXX	Visitor Service provider Bath resident	No No
Strongly disagree	No	It doesn't stop a man with a knife or wearing a back bag full off explosive 🧨🧨🧨 which seems now how terror attacks happen	No	If you are elderly or disabled and need to get to shop as near as possible your not allowed to go down the street is discrimination against thoughts	No	As provided in the last box, council can't even get this right 🤔🤔🤔	How about disabled and elderly who have blue badgers and can't drive and need taxis for there life line, but taxis are not allowed 🤔🤔🤔🤔	Allow taxis to help the vulnerable and let them use the roads they all should have low emissions vehicles now, instead off making it awkward for everyone	Bath resident Local business	Yes
Disagree	No	It makes the city less accessible for older people and people with disabilities. I am a taxi driver and with the current restrictions I have had to tell people I can not drop them where they want and they have cancelled their journey. I have had many people want to go to specsavers or boots on westgate street and as I have not been able to get them to the door they have been unable to go.	No	I do but think Taxis and blue badge holders should also be able to have access during these times	No	Taxis, buses and blue badge holders should also have access to these roads during these times	Reducing access to the city centre will make the city inaccessible for many people at a time when business are struggling and many shops in Bath are empty. The parking charges already put many people off coming into Bath.		Service provider Bath resident Local business Service provider	No
Strongly agree	Yes		Yes	It could be 9am - or earlier - to encourage deliveries to happen prior to rush hour traffic	Yes		There should be more allocated COVERED parking in Charlotte street, with a FREE ELECTRIC shuttle for disabled holders which would be able to drop them off in the centre of the restricted zone where the parking bays currently are.	Great project - thank you.	Bath resident	No
Disagree Strongly disagree Neither agree nor disagree Neither agree nor disagree	No Yes No	The city's traffic system was designed by a moron and is continually messed up by idiots please don't waste our money messing with it any more	No	Uh	Yes		There is not enough access for the disabled allredy to make it harder for disabled is scandalous	Leave it as is	Bath resident Service provider	No
Agree Agree Agree	Yes Yes	Taxis should be allowed on Milsom Street	Yes Yes No	Taxis should be allowed on Milsom street	Yes Yes Yes	Taxis should be allowed on Milsom street		Taxis should be allowed on Milsom street	Local business Bath resident Bath resident	No No No
Neither agree nor disagree Agree	No No	Access to broad street for taxis drivers is an essential route for us to use. We can reach other areas of the city alot quicker and we can benefit from not sitting idle in traffic during rush hour. This route cuts our journey time in half, with less cost to the customer.	No Yes	Yes apart broad street. Milsom street should have access for taxis so wheelchair accessible vehicles can enter.	No				Bath resident	No
Agree	No	You restrict taxis from doing their jobs by closing certain streets in the city ... Especially when things ARE open the theatre, bars and restaurants around these areas are where a lot of elderly residents go in the day times, they rely on taxis to get to and from these venues. A lot of people aren't able to walk to pick up points, so by closing these streets to ALL traffic you are preventing people from getting out and about and also Drivers from doing Thier jobs. That's if there are jobs to go back to after the pandemic.	No	Same reason I stated before. People need transport, especially the elderly who use taxis to get to and from the shops, opticians, dentists, doctors, theatres, restaurants in these areas	No	See above comments			Local business Service provider	No
Disagree	Yes		No	Because i am a taxi driver and what i have to do if i have to pick someone up from milsom street in that time??	No	Taxi's should be allowed as well.		Local taxi's should be allowed in milsom street.	Service provider	
Strongly disagree	No	Why? You spend 5 million £'s on a bridge encouraging more people to access the centre?	No		No				Bath resident Local business Service provider	No
Strongly agree	Yes		No	Residents do not only use removal companies to get goods, furniture and larger items to and from their properties. It is important that residents living within the restricted zone have access to time limited parking upon prior agreement.	No	As well as residential access it is important that disabled people are not excluded from the city centre. It would be useful if this consultation where more transparent and provided details of how disabled people could still get access to the city.	See previous comments.	I think it is important that security measures are not blatant like large concrete barriers currently in place at the end of Cheap Street. We want to visitors and residents to feel secure in the city and even subconsciously, if they are faced with anti-terrorism measures this might adversely affect the visitor experience. I hope measures are put in place to disguise such interventions with the use of public realm improvements such as parklets and other forms of places to stop and reflect.	Bath resident Local business	No
Strongly disagree Agree Agree	No Yes Yes	I don't agree with restrictions on any streets	Yes Yes		Yes Yes			This is all well and good, but until councils like BANES take account of the overall comfort of visitors it's just part of the issue. It seems the Covid and security issue has given an excuse to make public toilets move from dire to non-existent.	Bath resident Bath resident	No No

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly agree	Yes		Yes		Yes				Bath resident	No
Disagree	No	I am sick and tired of all the extra street furniture, signs and traffic lights popping up all over this city. You are turning a UNESCO World Heritage city into an American city scape of ugliness and uncontrolled destruction.	No	Would only agree to this if the traffic is controlled by real people (perhaps homeless folk) with red flags.... At least they can go home and are far less intrusive than signs street furniture and lights	No	How will you be able to tell if a lorry has a fridge or a bomb! Ridiculous!	Provide motorcycle parking, on street parking for electric vehicles and access with charging points and secure manned parking for bicycles and electric bicycles.	Why don't you get rid of the Bath CCTV control room and CCTV, resurrect a city centre police station and remove ALL street furniture. Let pedestrians, cars, motorcycles scooters etc share all space without designation. Should save a fortune and you can put the money towards tackling homelessness and social care.	Bath resident Local business	No
Agree	Yes		No	The problem it's short time to load the van and quick go whit need time from 11 am till 5pm that good so no restrictions at all.	No	Some pole come to work 10 am it's better from 11 am till 5pm				
Neither agree nor disagree	No	The threat of terrorism in Bath is minimal and cutting off access to shops and facilities on these streets is excessive. Over kill. While it is nicer to walk around Bath without traffic, reality says you will kill off shops and their trade. Another nail in the coffin for local shops.	No		No	unnecessary and another example of control. Ideology with it's usual uselessness.	Leave things the way they are!	Just as useful as the Clean Air Zone ideal!	Bath resident Local business	No
Agree	No	Bath's retail centre is inevitably going to contract, would make sense to do this in a managed way, leaving the central spine which is already largely pedestrianised. Adding cross streets to that like Westgate street makes residential use of those streets less practical if deliveries etc are to be banned.	No	If you have residential properties in those streets, access for deliveries as shown under the pandemic is essential - otherwise you end up with inadvertent discrimination making it impossible for less able bodied people to live in that area.	No	As above access for deliveries for residents should be maintained.	If implemented as proposed this scheme would eliminate disabled people from being able to live or visit homes in the centre. Whilst there may not at present be that much residential occupation, with the retail estate likely to contract its worth considering this point now.		Bath resident	No
Strongly agree	Yes				Yes		These security measures should be integral to a strategy to make Bath centre pedestrian priority. Anyone frequenting the centre can see that blue badges are widely misused. This should be addressed so that those with genuine need have available parking spaces. There is, however, no logical reason why those with restricted mobility should have special provision while in a moving vehicle.	Time and again well meant traffic and highways measures in Bath are let down by insensitive and excessive signage and road markings. The package of measure now being proposed should have professional urban design as an absolute requirement.	Bath resident	No
Neither agree nor disagree	No	You should be doing this from an environment point of view as well as safety from vehicle accidents rather than terrorism.	No	Should be a radical redesign that fits 24 hrs	No	24hrs	I think this issue should concentrate on real threats to health from pollution and vehicle accidents		Bath resident	No
Strongly agree	Yes		Yes		Yes			Possibly the most crowded area in the city centre is the Seven Dials, where a variety of streets converge. If I were a person of ill intent, I would see a golden opportunity to drive down Westgate Buildings, which remains open to through traffic under these proposals, to inflict big damage to shoppers, theatre goers, restaurant diners, take-aways and al fresco users of the new open area of Kingsmead Square. Westgate Buildings should also, therefore, be closed to routine traffic. Buses could easily be diverted along James St West and Charles Street. Alternatively install a bus gate at the Westgate Buildings/James St West junction. This would have the major side benefit of enabling the currently horrible Seven Dials environment, a so-called shared space which was completely ill conceived, with no parking enforcement, to become the most wonderful social destination in the whole of the UK. It would also enable the original purpose of the Seven Dials, funded from the DfT Cycling City Ambition Fund, to be implemented, ie cycling from the Griffin pub on Monmouth Street, where the cycle contraflow currently ends, to Westgate Street, thereby creating a direct cycling route through the city centre. Access to domestic and business property parking on Monmouth Street is low and would remain largely unaffected by the introduction of permits.	Bath resident Bath stakeholder / Community organisation	No
Strongly agree	Yes		Yes		Yes		We need to get less people travelling into and around Bath via car - this will ensure that parking spaces will be more available to those who have no other option than to drive, and that they won't have to sit in traffic with other cars that don't need to be there.	Not sure of the reason for the restrictions only applying 10am-6pm - there is really no reason for private cars to need to use these roads at any time of day. In special circumstances, such as a resident needing to load/unload because they're moving, they could apply for a permit that allows them vehicle access for a day. It has been proven that pedestrianisation is good for business, as pedestrians and cyclists are more likely to stop at shops/restaurants and spend money, and it will make the city centre a more pleasant place to spend time. Resurfacing the road to make it look pedestrianised/same as the pavement would also be really helpful in slowing down the vehicles that do enter and encouraging people to walk in the whole of the street.	Bath resident	No
Agree	Yes		Yes		Yes				BaNES resident	Prefer not to say
Strongly agree	Yes		No	There are many small businesses within the area, shops, cafes, holiday homes. Access is already difficult, this will make it more so.	No	Deliveries need to be made.		No doubt a very local, armed response officer will or is available to deal with random incidents	Bath resident Bath resident	No No
Agree	Yes		No	You are discriminating against disabled people needing close access to the centre of town.	No	You need to make it possible for blue badge holders to access streets such as Westgate Street, and increase the number of accessible (ie for a wheelchair user down a rear car ramp) close to the exclusion zone. And police them better than you do at present so they're ONLY used by blue badge holders	You need to provide parking spaces that permit ramp access to wheelchair enabled vehicles. Parallel to the kerb parking spaces do not address this. They will need to be available on both sides of the city centre so that disabled people do not have to drive all the way round the outside of the city thanks to the bus gate.		Bath resident	Prefer not to say
Strongly agree	Yes		Yes		Yes			Milsom Street needs to be integrated in this. Ideal space for pedestrianisation and cafe seating. Only provide vehicular access to electric buses, emergency and maintenance vehicles.	Bath resident	No
Strongly agree	Yes		Yes		Yes			It all seems reasonable and proportionate. And from what I see/deduce I will still be able to do my "dawn raid/supermarket sweep" at Waitrose XX parking on the north side of the "Guild Hall island".	Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No	The security services and police have powers to track and prevent terrorism. These proposals are an unforgivable attack on personal liberty: what you're proposing is a police state, in which we are all cowed and living in fear. That's wrong. I will never support it. Shame on you for proposing it	No	There should not be any restrictions. Security services and police should do their job. We should not live in fear	No	Please see previous answers	Please see previous answers	Please see previous answers	Bath resident Bath resident	No No
Disagree	No	I think you are going to kill most business in central Bath.	No	I just think it is overkill. We need security but this is too much. I don't have any particular answers but you will put people off visiting.	Yes		You need to give them access, Much more than your proposed plan.	I know we all need security but this seems like overkill to me. You will put a lot of people out of business.	Bath resident	No
Strongly disagree	No		No		No				Bath resident	No
									Local business	
Strongly agree	Yes		Yes		Yes		When will this report? It must be before implementation commences.	Please also consult cycle users on the designs for cycle hoops and bays. Also provide secure on street cabinets for residents cycle storage as in Waltham Forest.	Service provider Bath resident	No
Agree	Yes		No	I am concerned about the many disabled residents and visitors who find access difficult	Yes	My friend has a blue badge and finds accessing the shops very much more difficult now. Whilst I agree with restricting access, maybe we need some parking for disabled, possibly bookable beforehand.	I agree that we need better security, but this should apply to Southhof the river too. widcombe suffers from a great deal of drug dealing and graffiti and we need protection, since the centre of town is now very much in the South of the city.	Bath resident	No	
Strongly agree	Yes		Yes		Yes			Concerned that a vehicle could travel along the footway that connects Terrace Walk and Abbey Green. Do we need a bollard here as well?	B&NES resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Disagree	Yes		No		No				Visitor	No
Strongly agree	Yes	A larger restriction zone would be better	Yes		Yes				Bath resident	No
Strongly agree	Yes		Yes		Yes				Visitor	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
									B&NES Resident	

Vehicle access restrictions in the city centre's most crowded streets should be used to protect people from hostile vehicles	Do you agree with the streets proposed to be included in the protected area?	If No, please provide any comments or suggestions	Do you agree with the limits on the use of the streets between 10am and 6pm?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 10am and 6pm?	Do you agree with the limits on the use of the streets between 6pm and 10am?	If No, please provide any comments or suggestions that may help us refine or improve city centre security access restrictions between 6pm and 10am?	Please provide any comments or suggestions that may help us refine or improve the quality of accessibility for all people and replacement car parking facilities for "blue badge" holders	Please provide any other comments or suggestions below	What is your interest in the City Centre Security scheme (please select all that apply)	Do you consider yourself to have a disability?
Response	Response	Open-Ended Response	Response	Open-Ended Response	Response	Open-Ended Response	Open-Ended Response	Open-Ended Response		Response
Strongly agree	Yes		Yes		Yes		This will make the city centre far safer for the disabled and families with pushchairs, especially if the potholed streets and uneven pavements were fixed. It might be worth having a couple of dedicate Shopmobility parking spaces near the Shopmobility office. I recommend an enforced speed limit for cyclists as pedestrians will expect the area to be traffic free (also consider if all routes need to be open to cyclists /escooters- I suspect not). Longer term it would make sense to relocate the Lansdown P&R bus stop and close Milsom St	The existing arrangements aren't pretty but it has made a real difference to central Bath, especially Westgate Street. The bollards need to be robustly installed, whatever design. The standard thin black ones on North Parade are forever becoming dislodged either because of road vibrations or bad parking! It would be a great opportunity to install some stunning street furniture (like Woodscape did for Southgate) and some CCTV monitored bike racks (for the more expensive ebikes).	Bath resident	No
Neither agree nor disagree	Yes		Yes		Yes		please make sure that the spacing between any bollards is wide enough to allow all electric cargo bikes, mobility quad cycles or other wide bike to freely pass		Bath resident	No
Strongly agree	Yes		Yes		Yes				Visitor	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
							Consult with experts but with the principle of avoiding vehicles entering and parking in the city. There must be ways to deliver drop off and pick up services. Perhaps specially adapted vehicles serving the Park and Ride sites, where cars could be left, and dropping off and picking up blue badge holders at their destination.	As well as security the quality of road and pavement surfacing, and other street furniture, should be upgraded. Westgate Street should be resurfaced with an attractive single level paved surface, removing kerbs, for example, with standard lamps and other public realm street furniture.		
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly agree	Yes		Yes		Yes				Bath resident	No
Strongly disagree	No		No		No				Bath resident	Prefer not to say
Strongly agree	No	Vehicular access from John Street to Wood Street should be prevented as this is a narrow road with no escape for pedestrians should somebody decide to use a vehicle as a weapon.	No	10am to 10pm would be much better along Westgate and Saw Close	No	10am to 10pm would be much better to support evening hospitality businesses. Also consider 12am around Saw Close	Car ingress into the city centre is ridiculous given that there is ample parking available.		Bath resident	No

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
	<p>For some reason the security cordon misses out this area of the city. John's St is a narrow corridor and in terms of danger to pedestrians would be horrendous. There are also a number of bars in this area and this should be considered part of the Saw Close 10am-10pm closure.</p> <p>I also understand that this is used as a rat run. I hope this area can be looked at as part of this.</p>				
<p>Well you might say "we need to be safe" How safe, as no one is ever perfectly safe. Has anyone calculated the risk of such an event that the Chief Constable is reportedly concerned about. How does it compare with the risks of ordinary life?</p>				<p>I note from today's Chronicle that the Council is considering shutting the centre of the city to those unable to walk far. Please note that Bath's population is skewed towards the older end of the age range than the normal for the UK and that the ability to walk and stand declines accordingly. If the report is a fair one, the proposal if approved would restrict those people from many shops in Bath. I have no information on the effect on the retailers but I cannot believe it would be helpful after lockdown 2</p>	
				<p>I find most of the proposal acceptable, and not likely to be too bothersome, except as follows. Restrictions on disabled access parking seem draconian. Surely it is possible to restrict vehicular access whilst enabling wheelchairs to use (as it were) a side entrance, and to have associated parking eg along Westgate Street? Unless, perhaps, wheelchairs are - not unreasonably - seen as potential bomb-carriers. In that case, they should be even more restricted than is proposed - and in any case motorbikes must be restricted as well, since they too can carry bombs but also cause deaths just like cars.</p>	<p>There soon needs to be very many high-speed charging points throughout the city for electric cars (doubtlessly with penalty payment for fully-charged parkers). How will these integrate with access restrictions and heritage protection in the area under discussion?</p>
				<p>I am so bitterly disappointed to read on my telephone recently that Bath Council are saying they are going to ban all cars from the City Centre, including disabled cars due to the risk of terrorism! Is this happening in higher risk areas of the country like London and Manchester, where attacks have actually occurred? Obviously I feel that terrorism risks out weigh disabled parking spaces, but I do not accept being pushed out of our city due to a possibility. I am so angry that the council have yet again pushed forward with this announcement, on social media, regarding kicking out disabled drivers from the city, when loads of disabled drivers are being advised to stay inside their homes in the lock down! This happened last time during shielding and I think the timing is disgusting. I want clarity on what ideas the council are coming up with for disabled drivers to park themselves and use their city. We pay council tax too. We expect to independently use our city like anyone else. This smacks of discrimination to me. Why should we miss out when we are law abiding citizens already dealing with daily discriminations? Why on earth are we being banned due to criminals possibly targeting our city? I am furious and I will fight this all the way. I think that this decision is taking away Blue Badge holders independence. People do not want to be dropped off and picked up. They want to use their cars like their feet and want the same rights they had before Covid hit. It feels very much like Bath Council are going to force a car free city centre under any heading. It is being pushed through while the most vulnerable in your area are all at home.</p>	
				<p>The second time I repeat that the council have done this. Or third if you consider the deletion of parking spaces in favour of a casino, the police station being closed so disabled bays were taken for police parking, extra taxi ranks and I watched and counted that Bath Council deleted so many spaces even before Covid hit and I know you received my emails about my disapproval about that too. I now plan to get support for disabled drivers to continue to come into their city and park and insist on the same rights as the rest of the UK. This is absolutely unacceptable to take any more parking away. I have noticed it and I cannot be the only one. I will stick up for all the disabled drivers even if the council are doing their best to ignore them!</p>	
<p>Didn't realise we still had a police force in Bath</p>			<p>see daytime access restrictions</p>		<p>The hours of operation will need to be varied when large crowds come into the city at night - eg Bonfire Night, New Year's Eve.</p>
<p>The Landmark Trust is a historic buildings preservation charity which owns the Grade II* listed Elton House on Abbey Green, which it lets for short-stay holidays - all the income generated from this activity is then reinvested into the building. We understand the background to the proposed changes to permanently strengthen on-street security within Bath city centre but these changes will make the operation of our building even more difficult than at present.</p>		<p>The property sleeps ten people and is often booked by multi-generational families. At present the opportunity to drop off and collect luggage and older family members is available but will not be available once the proposed changes are implemented. This will reduce the number of people who are able to book the property which will lead to a reduction in income and leave us with insufficient sums to maintain the fabric of this delicate building. Furthermore we will incur additional costs associated with the delivery of laundry and servicing the building putting further pressure on the available funds for its maintenance and long term preservation. We would ask that you reconsider the proposed restrictions and allow us to continue to effectively operate and maintain an important building in Bath.</p>			
		<p>Having just participated in the webinar it would be useful to understand how road freight will be able to collect and deliver goods to businesses, within the zone. We have many members and represent more than half of the UK HGV fleet. The RHA is a statutory consultee in this process. It would be helpful to know more about this scheme, to enable a proper response.</p>			
				<p>Can you please confirm that new security bollards still allow passengers to easily reach buses to board and alight - including those buses which have doors in two positions along their roadside. Buses such as Bath Bus Company's tour buses, also have wheelchair ramps at these positions which are frequently used and require a little more space as a result.</p>	

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
<p>The justification for all these draconian restrictions is vague but appears to be that in the past terrorists have used vehicles as weapons in crowded areas. This begs several questions. Why this crowded area? There are many other city centres which attract crowds is the intention to lock them all down? There are other areas of Bath and BANES which attract crowds can we expect these restrictions to spread? Why focus on this particular type of attack? Recent attacks have, for instance, been carried out by pedestrians with knives and rucksacks full of explosives. Does this mean we can shortly anticipate metal detectors and baggage searches before you can enter this part of Bath? However, even if we concede the justification for these restrictions the plans seem to be designed to bear down on residents far more than is justified or equitable to such an extent that it almost seems aimed at deterring people from living in this area altogether.</p>				<p>Anyone living in this area will be essentially trapped unless they are able to walk, cycle or use mobility vehicles to reach shops and other facilities including Blue Badge and general-purpose parking areas. It is admitted that there are as yet no detailed plans for how to deal with taxis and for mobility-impaired residents. Emergency vehicles have five entrances to the area controlled by CCTV and will radio ahead to ensure access. Residents will be expected to book and vehicular deliveries or access by tradesmen several days if not weeks in advance when after a complex bureaucratic review which will require information about things like the vehicle identification numbers and the name of the driver they may be issued with a tightly restricted pass. The area contains St Johns Hospital, Arington House and the Min Building. There will be no parking in this area at any time. The council seems to have given no consideration to helping or compensating residents at all and have only recently started to look at ways of helping even severely disabled residents. The current proposal leave disabled visitors a long way from the most popular shops.</p>	<p>Some example of where we believe BANES should be looking to support residents include: Turning the proposed system for booking deliveries and trade visits on its head. Rather than leaving residents between the rock of an opaque bureaucratic permit process and the notoriously inflexible booking processes of major companies and harassed small traders, residents should be able to contact council officers explain what they need and why they need it and have the council contact the companies concerned gather the information they need and make the arrangements for access. Given the consistent failure of both central government and BANES to provide adequate affordable public transport a car is still essential for many city centre residents. We have already seen a considerable reduction in parking provision and these proposals will add to that. It is time that BANES acknowledged this reality and allocated "residents only" all-day parking in city centre car parks for residents in the area covered by these and other proposals to remove parking spaces. We are advised that these proposals are likely to have an impact on property values in this area and we think that resident thus affected are entitled to get compensated.</p>
				<p>I have read your consultation document with interest and think it handles an important subject well. However I think your restrictions on drop off for the seriously disabled are unnecessarily harsh considering the considerable list of exemptions you suggest. In order to provide access for the exemptions there will be controllable barriers. While it is not practical to allow all blue badge holders through any of these there should be a process available to allow drop-off for the seriously disabled. That does not need to include allowing the drop-off vehicle to stay but there needs to be a reverse ability to effect pick-up. In order to provide access for the exemptions there will be controllable barriers. While it is not practical to allow all blue badge holders through any of these there should be a process available to allow drop-off for the seriously disabled. That does not need to include allowing the drop-off vehicle to stay but there needs to be a reverse ability to effect pick-up.</p>	
<p>Page 288</p>					<p>is there any evidence that existing measures have prevented any security incidents since 2016, as claimed on the Council website? the proposed measures will seriously impede the operation of businesses and residents within the proposed zone, including those with disabilities, they may make Bath City Centre seem less welcoming as visitors, hopefully, return, they will also increase Council running costs to operate the various barriers, on top of initial costs to install, the risk of a terrorist incident at which these measures are aimed seems low in practice, in spite of the national picture, on the basis of the types of incidents which have occurred recently, even as far back as the London bombings. These measures seem driven more by the local police wanting to be seen to do something than by hard evidence, and are disproportionate to the risk, this may sound cynical and uncaring, but there is always a balance to be struck between a reasonable level of risk and the cost of precautions</p>
		<p>We are told that you are engaging with companies about how they will work with you and residents to ensure that residents can get goods and services delivered and we were asked to comment about which firms need to be included. To start with we need to consider urgent situations which are likely to require heavy equipment either to undertake work or to replace failed equipment. Clearly leaks of water and gas require arrangements to be made quickly with Utility Companies but also emergency plumbers.</p>			
		<p>Breakdowns of critical equipment like cookers, fridges and heating system require access by electricians, plumbers and white goods sellers. The discovery of dangerous or worn installations requiring rewiring or the replacement of obsolete equipment requires access by plumbers, electrician and utility companies. Loss of telephone and/or internet connection requires access by Openreach and contractors of ISPs many of which have tight rules about how far they will transport equipment by hand. Many vulnerable people in the zone depend on carers and cleaners who often have equipment to carry and are operating to very tight schedules often imposed by NHS subcontractors. However, there are many not urgent deliveries where the proposed arrangements, which seem to be based on commercial deliveries which can be easily scheduled. Residential deliveries are not like that: • Suppliers and their sub-contractors often have inflexible delivery booking processes mediated by machines not people • Unlike shops houses are not permanently manned during working hours • Few suppliers offer to provide details of delivery staff or vehicle identity numbers or descriptions and I doubt if many would be able to • Few suppliers can or are prepared to offer very tight delivery slots the best most offer is 4hr targets. We would reiterate that it is unfair to put residents, particularly elderly residents, between the rock of supplier inflexibility and the hard place of an opaque bureaucratic process particularly one that operates at the glacially slow pace you seem to be anticipating.</p>			
<p>Whilst I agree that towns should consider security against terrorist attack, entering a crowded area by vehicle is not the only way to achieve this - consider the recent attacks by individuals on foot. Therefore I do not agree that the centre of our City should be locked out to all vehicular access.</p>		<p>I attended the webinar Zoom meeting on 24th November and was perplexed and very concerned at the suggestions for arranging deliveries to ones home, i.e. needing to phone a department at the Council in order to give delivery vehicle registration number and driver details. And this to be a fortnight or so in advance. I do not order goods online at all (I prefer to use shops) but I think it is usually the custom for the company delivering the goods to state when they will come, - not giving the customer much option.</p>		<p>Also I am very concerned that disabled, blue badge holding City Centre residents will feel very curtailed, e.g. with parking or the need for a taxi pickup. The very nature of a taxi pickup is not something one books for a fortnight in advance, (in order to give the Council the necessary vehicle details). And blue badge holding drivers who need to get to e.g. the newly positioned Post Office, cannot be expected to walk from the car parks, as suggested in the document. Do you really want to make life so difficult for those people who already have problems?</p>	

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
<p>The protection of Bath city centre from terrorist threat is overdue and the Council's plans are most welcome. Access to the centre during the day by vulnerable groups, eg children or elderly arriving by coach, should be permitted through prearranged agreements</p>	<p>The area defined in the consultation document covers the most vulnerable part of the city but it is surprising the High St and Guildhall are excluded along with Kingsmead Square. If Milcom St becomes traffic free, it too should be considered for inclusion in a security zone.</p>	<p>Making the area traffic free from 10am to 6pm will provide protection when it is most needed and considerably improve the quality of the heritage environment for many visitors. However, wider sustainability is the primary consideration. Those city centre businesses wishing to continue trading in a secure zone must, if they are to succeed, be consulted regularly and kept informed by a Council office with overarching responsibility for the centre.</p>	<p>If the evening and night restrictions (6pm to 10am) on vehicle movements are going to work, then there must be a detailed management plan for residents living within the security zone. Bath city centre is attractive for urban living and upper floors throughout the city are being converted to residential use. How security measures are handled at this time of day will require a high standard of management otherwise the city's important residential function will be undermined.</p>	<p>Reassurance from effective security is only realised when all city centre users are prepared to sacrifice some convenience of access. For example, there will be no more car borne dropping off or picking up. Disability does not, in the majority of cases, mean immobility. Therefore, parking restrictions can include disabled drivers although they should be allocated parking places located closest to the security zone.</p>	<p>How cities are managed has never been so important. They are the economic and social building blocks of the nation. It is interesting to note that Bath's requirement for comprehensive urban management, now so necessary, is being fulfilled not by commercial or social imperatives but an existential threat of terror.</p>
<p>The current Treat Level is cited as the reason for closing streets. To our knowledge Bath has not been subject to a terrorist attack. St Albans, also a Roman City, was subject to an IRA attack in the city centre in 1991 and has not seen the need to impose similar restrictions. Oxford Street, the UK and London's premier shopping street - and prime terrorist target - also considered similar restrictions on security grounds, these were abandoned when businesses realised the adverse impact this would have on their trade. We have asked for, but have not seen, an Economic Impact Assessment for these measures. 14. We have spoken to Avon & Somerset police C/SA and we were led to believe that security measures are being used as an excuse and are not the primary reason for these proposals. The only impact these proposals will have is to the detriment of business and local residents.16. We consider the Physical Protective Security measures are disproportional to the threat. Other terrorism counter measures could be deployed more effectively, as they in the City of London, which do not adversely impact the local economy, businesses and residents.</p>		<p>The RHA strongly objects to the proposals contained in this consultation. This will severely and adversely impact the ability of road freight to operate in the proposed restricted area to make deliveries and collections. 6. All businesses rely on the delivery and collection of goods to enable them to trade. It is essential that these businesses have the ability to receive and collect goods, during normal business hours. Deliveries and collections out of hours are more expensive. 8. Everything in a city is delivered by road. All final mile deliveries are by road freight, the power source is irrelevant, roads are the only way to access business premises. As well as businesses, private dwellings will be adversely impacted. Large, heavy items such as construction materials and heavy furniture will not be delivered, without considerable unnecessary administrative burden and additional cost. Much Road freight operates on a just in time basis, the arrangements for deliveries in the restricted area will be unable to take place under these proposals.</p>			
<p>Page 289</p>				<p>Crumbs for people with mobility disabilities. A really check for you! I'm my mums carer. As the years have gone on her mobility has decreased. Her osteoporosis and other conditions has resulted in needing to use a rulator on the ghastly Bath pavements, for relatively short distances- south parade to Iceland (the Shop) Lack of safe ramps make it unsafe even before COVID measures are put in place For longer distance My car with a Blue Badge is essential. The story today Going to XX We had worked out than unless we got mum an appointment at 09:00 use of the car to get her across west gate street was not possible West gate street is blocked off with no access after 10:00 In these COVID times appointments are hard to get 13:00 appointment. We collected her from XX, then drove to the junction with west gate street/Monmouth Street, used to be able to wait with a blue badge but no longer Mum managed the distance to XX. My husband planned to wait with the car but was encouraged to move on by a helpful security worker. On returning after one and a half hour appointment, in h3 rain to discover no transport available where I had expected My mums poor mobility forced me to enter a private property garden so she could sit down where I managed to get my husband back to pick her up where we had dropped her off I now think we are not even allowed to drop someone off these now. So my concern is that disabled residents who have made their life here, supported he economy, contributed to the local community will be forced from their home, because of these new measures.</p>	
				<p>I havnt got the answers, but the approach being taken certainly doesn't feel correct If the concern is to stop potential terrorist threats then use dead ends Make vehicles move slowly using twists and turns but please don't stop disable cars from stopping, unloading close to the services they require. Then what about access for personal care services, such a nightmare This doesn't directly effect my mum as they can still drive to her flat for nightcare support Im pretty sure that the result will be the closure of multiple places that rely on the grey pound. Hollowing out Bath residents, leaving unoccupied properties, increasing areas where begging will increase This is not a NIMBY cry This is a cry to look at the consequences of your actions</p>	
				<p>In response to the proposed permanent access restrictions for Bath City Centre. There are 3 chemists on Westgate Street (Boots, Superdrug and Lifestyle Pharmacy). Many disabled people use these stores in preference to the main Boots store in Southgate Shopping Centre as that particular pharmacy is upstairs on the first floor and therefore access is not as easy for persons with limited mobility. It takes considerable time (the store is big, busy and often long queues at the pharmacy counter), money (the minimum fee is £3.50 even with a blue badge!) and effort getting from the underground car park to the store and then using the lift (not always available), escalator or stairs and then there's the return journey. Therefore the 3 chemists on Westgate Street are much easier, quicker to access and on street parking for Blue Badge holders is free for the few minutes needed to pick up prescriptions etc. They are at on the ground floor straight off the pavement, service at the pharmacy counter is quicker as the stores are smaller therefore less busy. I forcefully argue that a few free short stay blue badge parking must be provided either along Westgate Building or Kingsmead Square for access to the pharmacies on Westgate Street. It appears to my husband XX who has Parkinson's that the needs of the disabled are once again being ignored.</p>	
		<p>As if life isn't difficult enough for city centre residents with a steady and determined reduction of our parking spaces, I was shocked to read in two national newspapers today that a security zone is being imposed on the city centre that will mean we have to get approval for home deliveries 20 days in advance. This is madness and is not at all justified by so-called concerns about terrorism. It seems to me to be another excuse for B&NES to turn Bath in to a car free zone with no thought of its daily impact on residents and local businesses. Does B&NES want families like mine to live in the city centre or not? With shops relentlessly forced to close, it has been suggested retail outlets could be turned in to homes but this seems unlikely with this council's negative attitude. What does seem clear is that the council dislikes cars more than they like residents or local businesses.</p>			

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				<p>I cannot believe what I have read. Worried about terrorism?? Terrorists strike anywhere. Have you any reason to think Bath is especially at risk - seems unlikely? I lived through the IRA bombs in London - no one suggested banning cars! I am aged 83, have a blue badge and walk - not far - with a crutch. Do you only want the young and fit - as long as they do not have small children? There is no way I would visit Bath if I could not drive or take a taxi. The last time I was in Bath I stayed in a hotel - drew up outside - they took my car away to park it somewhere. I was attending a wedding at Bath Abbey - took a taxi there and back. There is no way I could now walk far around Bath to shop or go to restaurants. All this required and requires vehicles. I believe the XX name is well known in Bath. The late XX attended my parents' boys' prep school. I repeat - do you only want the young and fit in Bath?</p>	
		<p>Can you explain to me how any of these scenarios can be acted on. Private residence within proposed area; Repairs, replacement of fixed equipment i.e central heating boilers. Small building works Electrical and gas safety repair and replacements. Emergency repairs. All requiring vehicle access.</p>			
				<p>This is a response from the Vineyards Residents Association to the consultation on the proposed road closures in Bath city centre. Vineyards is directly affected as we are in the Bath central area and in the city centre Controlled Parking Zone (CPZ). Our comments: 1. Reducing non-essential traffic in Bath city centre is a good thing. We have long supported 'a city centre free of all but essential traffic' (an aim of the Local Plan). 2. However, 'essential' traffic includes access by city centre residents, as well as for deliveries and services. The proposed Local Plan update includes the requirement to 'Retain vehicular access for residents and businesses' (ST5, page 45).</p>	
				<p>These proposals are inconsistent with that requirement. Access to the area will be required for service vehicles, deliveries, etc, so there will have to be arrangements for access for some vehicles. Since access will be controlled by ANPR cameras, surely a way can be found to allow car access by residents of the area? 3. Residents are the lifeblood of the city and Bath has an unusually high number of residents in the city centre. These residents animate the city (particularly important in the evenings) and maintain the historic buildings. The Local Plan recognises the importance of supporting city centre residents. These proposals should be amended to allow access by residents of the area. 4. There has already been a reduction in parking space in the central area due to the Covid restrictions which has impacted on the ability of central area residents to find parking spaces. If this proposal proceeds, residents of the affected area will be forced to park elsewhere in the Central Controlled Parking Zone. This already has extremely high parking occupancy rates and parking is always difficult for residents. Meter parking in the Central CPZ should be eliminated to give priority to residents. This would also reduce traffic coming into and driving around the central area looking for parking, and so reduce overall traffic volumes and emissions in line with the aim of the Climate Emergency declaration.</p>	
<p>As citizens of Bath we are most concerned at the Council's proposals to limit vehicle access to the city centre. The proposals appear to simply be an excuse for this Council to pursue its anti-car agenda and its wish to ban all cars from the centre of Bath. This is a totally unnecessary proposal using anti-terrorism, a hypothetical and unlikely scenario, as its excuse. The Council should not waste taxpayers money on such a false premise.</p>		<p>We understand that there would be restrictions on deliveries to city centre residents whereby they would have to seek the Council's permission and give twenty days notice of any delivery, which would be outrageous. Parking facilities in Bath are totally inadequate and due to become even worse.</p>		<p>The impact of such discriminatory measures on those with profound mobile disabilities. One person we know with disabilities has said they would never be able to go into Milsom Street or have access to the Theatre should these proposals proceed.</p>	<p>When we first moved to Bath many years ago, the city centre was an attractive and desirable retail centre. This has changed, stores are closing, there is an alarming number of boarded up and empty shops and this was happening even before lockdowns and there will be more. As a retailing centre when compared to other cities of a similar size, and we would cite Chester and Norwich as examples, Bath compares very poorly. The Council needs to be encouraging people and quality retail businesses into Bath and not the opposite. These proposals will only exacerbate this problem. We are also concerned generally at the Council's obsession with cycling. The Council has spent large sums of taxpayers money on cycle lanes which are quite simply not used and it is time that the pretence that they are ceased. These lanes narrow roads, making them more dangerous and scruffy bollards on certain lanes have now been installed. Further sums have been spent on e-scooters which, again, are not being used except by some young people jay riding at weekends, they are left lying around the city and are an eyesore.</p>
<p>Please make public what this terrorist threat is that I keep hearing about? Is the council hiding information from everyone? What is going on? Is ISIS back in business? I find it hard to believe that the council would be spending time and money on preventative measures without just cause. I worked in Bath when there was concern about IRA activities and I remember the general concern, searching bags etc at the time. It wasn't fun.</p>					

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
<p>Why, in the considerations for city centre security, are there no proposals to include the most visited areas of the city? Pulteney Bridge bombed would be very spectacular as would The Circus and The Royal Crescent. What about the rugby ground with its under-stand parking... On match days that would be devastating. The proposals mention making residents and visitors 'feel secure' - if people are constantly reminded of 'terrorist threats' then they are likely to be anything other than feeling secure, especially when they can see what a travesty the whole 'security' is. Surely, precisely the purpose of terrorism is to frighten (terrorise) a population? Where in the city centre security plans have you considered the fact that bombs could be walked in, bicycled in? The Manchester Arena bomb was in a backpack... Again, what on earth would stop a terrorist from arranging a van for a 'delivery' or 'emergency plumbing' etc. to anywhere within the proposed cordon. It would take very little intelligence or ability to circumvent these proposed measures. Ask yourself, if a terrorist was determined to place a bomb within the city centre security cordon, would it be very difficult? Lastly, why on earth do you think that Bath would be an attractive target for terrorists? The only terrorist activity in Bath was a rather half-hearted and very small bomb placed in the entrance to The Corridor by the IRA, that was in 1974... 46-47 years ago if, on the other hand, this is about pedestrianisation of the city centre to satisfy the Lib Dem's Green credentials then its a pretty good job</p>					
<p>I wrote to you with regard to my concern with the proposals to limit vehicle access to Bath city centre and neighbourhoods, specifically in regard to the negative impact on the disabled, being unable to access where they need to go. This goes beyond disabled parking, and should include the ability to drop off by vehicle very near to the required location. A disabled space in a car park is insufficient if your ability to walk is severely impaired. I have copied this to XX, who I understand leads on this matter.</p> <p>You may be aware of the decision in the High Court on 20th January quashing a 'Streetspace' proposal by the London mayor. I have found this QC's summary of the judgement. I quote the relevant sections with regard to disability. https://www.ftchambers.co.uk/news/high-court-quashes-mayor-londons-streetspace-plan-and-tfhs-bishopsgate-traffic-management-wednesday-20-january-2021 The High Court has today handed down two judgments in R (UTAG & LTDA) v Transport for London & Mayor of London [2021] EWHC 72 (Admin) and R (UTAG & LTDA) v Transport for London & Mayor of London [2021] EWHC 73 (Admin) High Court found that Mayor and TfL had failed to have proper regard to the public sector equality duty ("PSED") pursuant to section 149 of the Equalities Act 2010 (Ground 2); On Ground 2 the judge considered first the Streetspace Plan and the associated Guidance, which referred to the PSED, but was not informed by any sort of equalities impact assessment. Turning to the A10 Order, the Judge found that even though TfL had conducted an Equalities Impact Assessment in relation to the Order, in reaching that decision TfL had acted in breach of the PSED. On close consideration the Judge found that the EqIA produced by TfL did not meet the required standard of a "rigorous" and "conscientious" assessment conducted with an open mind.</p>					
<p>Rather, it was "inconsistent and irrationally underrated the risk". As the Judge said, "Most worryingly of all, the Equality Impact Assessment read as if its purpose was to justify the decision already taken". All three decisions were thus found to be unlawful on this ground. BANES have drawn up their detailed proposals - https://www.bathnes.gov.uk/sites/default/files/bath_city_centre_security_web_doc_final.pdf which include a future intention to conduct a disability study. "The Council recognizes this reduces the current quality of parking for disabled and mobility impaired people. This cannot be replaced within the security zone. Spaces for blue badge holders are available at Southgate and Council car parks, and the Council is also commissioning an independent pan-disability study in relation to the city centre access restrictions currently proposed. This will engage with stakeholders to help identify a package of measures to mitigate the impacts on the disabled community and those with mobility issues." This demonstrates the extent plans themselves were drawn up without the results of this proposed disability study. "Justifying a decision already taken", to quote the judge, is unlawful. Mitigation after the event is, I suggest, insufficient. Prima facie, this proposal leaves the council open to litigation, which would be very expensive for the council tax payer.</p>					
<p>The council may wish to seek legal advice. A potential solution that the council may wish to consider is to link ANPR cameras to moveable barriers to let registered local blue badge vehicles into restricted areas. This will enable required access and ensure security from terrorist vehicles in restricted areas - if not from knives, guns or bombs that can be carried or worn. Terrorists will naturally find alternative methods. Has a terrorist threat assessment against Bath specifically been conducted, and if so, do the proposals sufficiently mitigate this threat? I do hope we can find a way forward that meets the needs of all the community.</p>					

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					<p>Bath Preservation Trust understands the need for safe and welcoming streets and anti-terrorism measures.</p> <p>We support using this necessity to increase pedestrianisation in the city centre, and improve public amenity, subject to addressing disabled access concerns.</p> <p>We welcome a design approach that seeks to protect Bath's heritage, and the criteria set out in the consultation.</p> <p>In relation to the purpose-designed and reinforced street furniture we reiterate our key considerations in relation to any new interventions in Bath's historic public realm including:</p> <ul style="list-style-type: none"> • The importance of establishing a coherent, Bath-specific approach to street furniture. • The avoidance of discordant designs within the conservation area. • Designs that accord with and take reference the Pattern Book for Bath. <p>We recognise that bespoke design solutions for street furniture and bollards are likely to be too expensive. So, where possible in order to reinforce the character of Bath streets, we recommend that bollards are recessive in colour, probably black, and have a cast iron 'look'. And that street furniture takes some reference from the Pattern Book.</p>
<p>I write to express concern in respect of the nature of the consultation process relating to our Council's plans for enhanced security within our city centre zone. Let me first refer to the principle that is presumably and therefore understandably embedded in the general rationale for such a scheme. One of the prime responsibilities of our elected local or national politicians must always be the safety and security of our citizens, our city's visitors and our public realm. Indeed, one could well argue that this is in fact the absolute prime responsibility of our politicians and as such one would commend our Council's assumed objective in making more secure the environs of our city centre. Those who choose to challenge the legitimacy of our Council's rationale for their endeavours on this subject by suggesting that either our city itself is not a potential target or that potential terrorists only have a particular modus operandi, which is not in some way relevant to our city, could perhaps at best be viewed as somewhat naive in their thinking. Our Council is absolutely correct to continually challenge the prevailing effectiveness of our city's security measures.....indeed, we would be more justified in criticising them if they did not undertake such reviews. Terrorists, as we know, do not hesitate in the malevolence of the "mechanisms" that they use to inflict the highest possible level of casualties and suffering. Over the years even Bath has been the subject of attack, albeit and thankfully to date an apparent isolated incident, when in December 1974 an IRA bomb exploded in our city centre. That somewhat distant incident did not involve vehicles being used as part of the planned explosion but more recent terrorist activities certainly provide evidence of a wider spectrum of locations and devices used by such individuals or organisations.</p>					
<p>Notably at a Christmas market in Berlin in December 2016 where 12 people were killed and 56 others injured and also in the Promenade des Anglais in Nice where a vehicle was used to drive into crowds which resulted in the deaths of 86 people and the injury of 458 others. Nice, a city of many local residents as well as tourist visitors – not dissimilar to Bath in that respect, was completely unexpecting of and therefore unprepared for the nature of such an atrocity. For those who might regard Bath as a city off the 'radar' of potential terrorist activity, they should perhaps re-examine their logic. Whatever the warped nature of the individuals who perpetrate such acts one thing they certainly seek is the widest possible range of global publicity. A potential explosion in Bath some might well believe would have inconsequential impact and hence we would be ignored by such terrorists.....an explosion in "Bridgerton", perhaps bizarrely, might however well attract world-wide attention and headlines.</p>					
<p>In short, we all therefore and in particular our Council should always remain vigilant and are correct to make all efforts to make the security of our city as robust as possible whether that be in terms of our streets overall or our city centre or indeed in terms of high profile concerts or other major activity events held within our city. The above being said, what is also immeasurably important is that where 'innovations' that the Council is considering making, particularly impact upon our residents, then the consultation process must always be as thorough and robust as the original rationale for undertaking such action. Self-evidently, this does not appear to be the case with respect to this particular consultation to date. Significant disruption is likely to be caused to, in particular, those residents who live within the Council's current 'definition' of our city centre. CARA has a number of concerns in relation to the consultation process relating to the city centre security zone. As a neighbouring residents association we would echo TARA's observations about the apparent dis-proportionate impact that some of the suggested measures will have on people living within the proposed zone.....imaginative methods must surely be available to eradicate these very understandable concerns. Whilst commending what we assume to be the best and appropriate intentions of our Council in terms of creating an enhancement to the security 'regime' in some of our most significant and most visited streets we would urge that a meaningful dialogue with all city centre residents and other stakeholders be re-initiated as a priority in order to establish a solution which works effectively for all parties all of whom, we suspect, are keenly interested and for the correct motives in this vitally important matter.</p>					
				<p>With regard to the risk of terror attacks in the city centre, while I appreciate some security measures are desirable, your proposed OTT plans for the unfortunate residents lack any real thought as to how they will cope with day to day life, once their homes become part of the equivalent of a middle class ghetto. Totally heartless. I'm quite disgusted and I voted for you.</p>	

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				<p>I am really concerned about the proposed restrictions planned for Bath city centre. This scheme is far too extreme, the proposal too complicated and too confusing. This will negatively impact on our traders in the city, local residence, people with disabilities and the Elderly, all of whom rely on being able to get in to the city with ease to access vital facilities. I understand the desire for a car free centre and urge you to re-think this proposal.</p>	
		<p>I have huge concerns regarding local tradesmen with these proposals. Please take into account that people do need to be able to make a living and you should be supporting that not making their jobs impossibly hard.</p>		<p>My other huge concern is for people with disabilities. There clearly will not be enough parking for the disabled. This needs to be addressed so that no one is discriminated against. It has to be access to all in our city.</p>	
<p>Instead of listening to your long term residents who have been loyal to Bath and its city centre up till now, this situation has become a great deal worse with the recent 'exclusion zone' being created in Bath purporting to be 'for security reasons'. However this is also an obvious sham, wasting money that could be better spent on improving the substandard adult social care system we now have in Bath where the elderly and disabled are being denied the public services they need and are entitled to, though also charged exorbitant sums on top of their Council taxes by B&NES Council, causing real hardship and a lowering of the quality and standard of living for the real Bath residents, which is now giving us a bad name across the country and internationally.</p>				<p>Bath says it has a growing elderly population, many of whom live on the hills surrounding the city so these (including myself) will NOT suddenly be taking to bicycles to do their shopping no matter how many cycle routes are being created, which seem to be creating more hazards to unsuspecting disabled pedestrians and blue badge holders, not less.</p>	<p>Residents are being discriminated against in favour of non council tax visitors such as tourists and students but these will soon find better places to go with more life, diversity, culture and vibrancy than Bath which is already happening as B&NES Council gradually destroys the city centre excluding the very people who made Bath as attractive as it was for visitors, until now... The obvious mistakes being perpetrated by B&NES Council have been made by other cities and towns which have become shadows of their former selves and have gone down hill fast. They have become faceless, dull, lifeless and certainly nothing special over other places who believe in making their cities and towns MORE inviting and convenient for their residents and visitors, not less. There have been many examples already where visitors have said 'never again' about Bath and this message is being passed along at the speed of the internet. The downward turn in Bath's fortunes caused by B&NES Council will certainly accelerate with the creation of this new ridiculous exclusion zone and all of us find much better, less stressful places to go to for our shopping and entertainment, for good. It is not our wish to INCREASE our carbon footprint but this is what B&NES Council is increasingly and deliberately forcing us to do as well as diminishing our quality of life, our economy and visitor attractiveness.</p>
<p>I am writing to oppose your plans to get rid of cars in Bath City under your prevention of terrorism idea. I do not believe that hundreds of innocent, law abiding citizen's lives should be affected on a daily basis for a 'might happen' event. The Police have even said there is no evidence of an actual threat. I believe this idea will not only scare locals, visitors and will constantly remind them that the council believe that we are under threat. London has not instilled this idea or Manchester or anywhere else that has been attacked recently. How do you propose to protect us if a terrorist decides to use one of those ram an electric scooter at full speed into people or a shop window, or someone with a back pack on with an explosive device like in Manchester or a knife attacker as was the last sad attack in a park? Terrorists do not just attack in vehicles.</p>		<p>Why should home owners or renters need to pick up their parcels from an external address when they are perfectly entitled to have their parcels and shopping delivered to their home address? This must be an infringement on their rights and consumer rights. Have you considered how the elderly or disabled home owners are going to manage this and in the middle of a pandemic? The idea that they need to get 20 day permission in advance or apply for a one-time access permit for a bigger item like a washing machine and for when they are moving house is completely unreasonable and any spontaneity will disappear from their lives. This must be against some law or human rights. Also how will disabled people who live in the centre get to their own homes if you take away their parking rights? Would you like to organise your life in this draconian way?</p>	<p>If you get rid of vehicles, why are you allowing electric scooters, which are being used on pavements? They are a health and safety risk waiting to happen as disabled, elderly, people with poor vision, slow reflexes and lack of hearing will not get out of the way on time and could be severely injured. This is an accident waiting to happen and they are not Covid secure as I bet they are not being disinfected between uses. My main objection to your proposals is that I am absolutely furious with your suggestion that the council are about to take my rights away as a disabled driver. The only help I get with my life and lung disease is a blue badge that I pay for myself. We have every right to be able to drive in ourselves without your patronising suggestion of forcing us to be dropped off and picked up like children. I will fight you all the way on this. In my opinion, removing disabled parking in Bath City Centre goes directly against the Disabled access rights and the Disability Discrimination Act. I am going to seek legal advice about this. Using a bus is not possible for all disabled people especially those with hidden disabilities such as heart and lung conditions. The walk to the drop off will be too far for many with shopping and they are used to going straight to their own property to unpack not be suddenly told they cannot. Also we are not recommended to use public transport or taxis in the pandemic. The Disability Discrimination Act 1995/2005 it clearly states that people with disabilities have the right to access everyday services such as shops, hairdressers, post offices, banks and places of religious purposes. It clearly states that access is not only about a physical means of entry but making services easy to use for everyone. This will not always be possible if you take disabled driver's independence and rights away.</p>	<p>I have been writing to the Council for over a year now to complain that the disabled spaces in our city have been removed, deleted, without public consultation. I calculate at least 30 disappeared along Saw Close in favour of the new Casino being developed and has now been replaced with loading bays in favour of deliveries rather than the health of elderly and disabled residents. More disappeared in favour of a 'temporary' taxi rank in Orange Grove. Everything was changed around the Guild Hall where there are now only 5 disabled parking bays and lots more priority has gone to loading bays which are completely empty at the weekends which seems like a very poor use of space and very badly organised. During the first lockdown when most disabled drivers were asked to shield inside their homes, without consultation the council stopped parking all along Westgate Street and Queen's Square. I understand why due to social distancing but it was an unfair move to find out when we came back out again, that we could no longer park safely in our City. Also people with blue badges used to be able to park in Milson Street. No way now. During the 2nd Lockdown when we had to stay inside again I was absolutely furious to discover you had painted vertical yellow lines on Bridge Street outside of the Victoria Art Gallery, which is a lifeline place to park now you have removed so many parking spaces already. Again with no consultation at all I will continue to oppose this terrible injustice and I represent my disabled friend who has no access to a computer to complain for herself. On this matter I would like to ask how on earth you have consulted people who are going to be massively affected by this and have no representation or use of computers to complain themselves?</p>	
				<p>Under this opposition point I would like to represent my pupils who have ASD and would not be able to use public transport. Some find this very distressing indeed. People should be able to choose when they travel to their city to use the facilities, not have to wait until someone can drop and pick them up which is often very distressing for them. When someone is dysregulated, waiting is not an option.</p>	<p>You are not enabling us to have independence which is disgusting in today's society. The Government has been shielding people all year whilst our council seems very intent on ignoring our rights and excluding us! I look forward to hearing that this has been cancelled as I cannot believe that this is in the best interests of the residents of Bath City and I am ashamed of my council for even suggesting such horrible, discrimination on the pretence it will be protecting us when we all know this council has been trying to get rid of cars for years. We own one electric car and a hybrid so we are not big polluters either.</p>
				<p>SUGGESTIONS FOR SOLUTION TO REDUCTION IN PARKING FOR Blue Badge holders (BBH)</p> <p>Disabled Parking Spaces lost due to current restrictions</p> <p>Milson St 4 spaces at top outside Paperchase</p> <p>3 or 4 spaces Upper Borough Walls fairly recently created (from Middy) to replace the BBH lost in Saw Close yellow line loss in Barton Street which was turned into permit parking so is now always full</p> <p>The 4 spaces in New Bond St are still there if people realise you can access them via Old King St/John St and Quiet St!</p> <p>Yellow Lines Lost</p> <p>Barton St yellow line loss which was turned into permit parking 2 years ago so is now always full</p> <p>Ercead St Bollards</p> <p>Milson St At Bottom (Rd Closure)</p> <p>Kingsmead Sq and rd leading into it (Road Closure)</p> <p>Cheap St/Westgate St/Upper Bough Walls Road Closure</p> <p>York St Road closure</p> <p>Bog Island Bollards</p> <p>Mommouth St opposite Halfords/Tesco Bollards</p> <p>Dead end at by Forum bollards</p> <p>Queen sq Some ends or rows of paid parking</p> <p>On Street Pay Parking Lost which is free and unrestricted time for BBH</p> <p>The length of Milson St on RT hand side</p> <p>Walcot St outside Harvest and in the bend northwards Street by the Forum</p>	

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
				<p>3 sides of Queen Sq Monmouth St. entire length near Ustinov Monmouth St outside Halfords Monmouth Place Chapel Row all</p>	
				<p>Proposals for increase BBH parking 1.Abooth charges for BBH in Banes car parks 2.Broad St Car park, current provision 5 spaces. Increase to 10 3.Remove/reduce parking spaces in Quiet St. to provide either BBP or yellow lines. This was a good place to park before it was converted to Pay and Display..now its always full 4.Remove no loading marks in Henry St to keep Double Yellow lines available 5.In Street by Forum provide BBP spaces 6.Remove bollards in Monmouth St. to allow either BBP or single yellow lines...near Halfords and near the Ustinov to replace lost parking in Kingsmead Sq 7.Seat off Kingsmead Sq further north to allow the street with the shops (sorry, cant remember what anyone of these are called) to be marked for pay and display and provide 4 BBP spaces. The parking could be end on to the pavement which would allow access and egress. This would retain the integrity of Kingsmead Sq for the open space desired Increase BBP in the Street linking Gainsborough hotel with stall street. There are currently 4 BBP spaces limited to 4 hours. when I visited yesterday around 4pm 2 were free. Usually these are full. There are BBP spaces in Westgate Buildings leading to Stall street but these are usually full. Even these measures are by no means replacing the amount of parking that has been removed and was accessed particularly by BBH. If you add the amount of Pay and Display also lost it is a huge amount.</p>	
				<p>All this comes following restrictions to access Yelow lines in Stall St, street leading to Abbey green, (By M&S) end of York St leading to Stall St. all implemented over a period of time. It would be a good idea if Banes sent a surveyor to measure the length of available parking lost both yellow line (single and Double), Pay and Display parking bays on street and BBP. This is the measure of the problem now faced by BBP, many who are elderly, use walking aids. As well as disabled younger people. Blue badges are not always awarded to physically disabled people but also to those with hidden disabilities and I feel strongly that many of Banes residents are being forgotten by the local authority.</p>	
				<p>I note the LOCAL AUTHORITY revisited its Equality Impact Assessment on 30/7/20and has provided further comment in relation to BBH. However, it continues to use the word "may" in relation to adverse impact (3.3) which falls far short when clearly there is a definite adverse impact so should be recognised by the word "will".</p>	
				<p>Review of the map of City Centre spaces for Blue Badge Holders. pages 7 and 12 of the document Bath City centre Security. 1.Missing bays for Blue Badge Holders 4 spaces at top of Milsom Street on left hand side 4 spaces at the Theatre Royal end of Upper Borough Walls, (these were available from 12 noon as it was Loading only before then. These were created about 3 years ago after yellow lines in Barton Street were turned into residents Parking 2. Single and double yellow lines removed In this section I have included recent changes such as the pedestrianization of Kingsmead Sq and the removal of yellow line parking and pay and display spaces as a result of widened pavements owing to the pandemic Avon Street on the north side of James street West. Pay and display parking on left and right hand sides plus yellow lines lost.Kingsmead Sq; loss of single yellow lines on top edge by Boston tea Party and loss of double lines in the bay on the right hand side near Sicox and sons Westgate Buildings loss of single and double yellow lines on entire length of right hand side and a couple of spaces outside Halfords Yellow lines around the Cross Bath near Little Theatre Cinema Quiet Street: Loss of yellow lines when Pay and display was installed. This meant previously available parking for BBH was lost as the P&D spaces are rarely available. Since the pandemic 2 P&D spaces have been converted to Blue Badge Bays</p>	
				<p>Milsom Street: On right hand side all the P&D parking the entire length of the street has been lost along with the single and double yellow lines along a large Part of the left hand side Broad Street loss of single lines (available 10 til 4pm) owing to pavement widening during the pandemic Walcot Street Pay and Display lost outside shops on west side Somerset St. Loss of P&D bays as well as yellow lines because of pandemic pavement widening The Cross Bath: Loss of access to yellow lines by proposed installation of bollards at junction of Hot bath St and Beau St (particularly valuable for BH parking for the Little Theatre and Help the Aged Day Centre. Queen Square: loss of pay and display and yellow lines on 3 sides of the square owing to new traffic scheme and pavement widening for pandemic Monmouth St. Loss of pay and display owing to pavement widening for pandemic York St. Loss of Pay and display as well as yellow lines. The end of York street near Stall street was cut off some time ago, this was a very convenient place for BBH to park for the middle of the shopping centre. Also, when the lines on Terrace walk were effectively removed from use by BBH by the imposition of No Loading restrictions this was a further reduction on available parking for BBH.</p>	

CCS Priority & Protection from Hostile Vehicles	Streets proposed	Daytime Access restrictions	Night-time Access Restrictions	Accessibility & Mobility	Other
				<p>The road closures that have already happened have had knock on effects on other yellow lines. Eg the yellow lines in Bridge Street alongside the Victoria Art Gallery are occupied by delivery vehicles who cannot access the closed off shopping area and George St available for BBH 10 till 4pm is again taken up by vehicles unable to access Milsom St. The issue of low traffic neighbourhoods (LTN) needs to be addressed as this will have an impact on available parking for everyone. For example I hear that the Circus and Gay street may be come part of such a scheme and so a large swathe of P&D and residents parking available to BBH as well as yellow lines will be lost. The LTN document states that BBH who live in a LTN will be given a permit but those who do not live in the area will not be given a concession. This needs to be urgently addressed as BBH will want to visit family and friends and their blue badge will not be valid</p>	
<p>The principle of the proposed security measures is supported, but a hotel development at the former Mineral Hospital must be able to operate efficiently in terms of the deliveries it would receive such as linen, food and beverage, and the items to be collected from site such as laundry and refuse.</p>			<p>We acknowledge the restrictions between 6pm to 10am would permit the deliveries and servicing at the hotel. The location and size of the loading bays would need to be confirmed and we would be pleased to discuss this further with officers. However, deliveries for consumable and perishable goods especially, would also have to take place during the day when vehicles would not be permitted to use Upper Borough Walls. The current scheme makes no allowance for this which would affect the re-use of the former Mineral Hospital and many other businesses on Upper Borough Walls, Saw Close, Westgate and Cheap Street. Suitable mitigation in the form of nearby loading bays outside of the security zone should therefore be provided for the re-use of the Mineral Hospital and other businesses on Cheap Street, Westgate, Saw Close and Upper Borough Walls. We understand this is happening to some degree now as part of the current temporary restrictions due to the Covid-19 pandemic. We understand there are existing loading facilities on Westgate Buildings, Monmouth Street and Barton Street, but it would be necessary for additional dedicated facilities to be provided on these streets or on New Bond Street at the end of Old Bond Street for example.</p>	<p>The proposed hotel would not be anticipated to attract a significant number of vehicle trips largely due to its central location accessible by walking, cycling and public transport. However, guests and visitors, particularly those that may be mobility impaired, should be offered a choice of means to reach the hotel which would also include by private vehicle or taxi, for instance from the railway station. This is not currently accommodated within the scheme being consulted upon. The security restrictions would not allow private vehicle or taxi access to use Upper Borough Walls. The dropoff and pick-up and "blue badge" parking requirements outside of the secure area would need to be provided as mitigation for guests and visitors to the proposed hotel and other businesses effected nearby. These will need to be available close-by for those in wheelchairs and carrying bags. In our view, additional pick-up and drop-off facilities could be provided on New Bond Street, Trm Street, Barton Street or Monmouth Street.</p>	
<p>We fully support the improvement of Security in the City Centre, the proposed static and sliding bollards and the proposed street pedestrianisations plans</p>		<p>2. Bath Abbey Weddings and Funerals – we need to be able to park wedding vehicles and hearses next to the Abbey (along the North side) before Cheap Street so that wedding parties and funeral parties can easily access the West Doors of the Abbey. Ideally we would like the vehicles to go through the sliding bollards at Cheap St and to park outside the West Doors, however if this is not possible, we can accept this, so long as we can park alongside the North side of the Abbey. 3. Deliveries / Contractors. We usually accept deliveries via our office XXX. We understand that York St will be pedestrianised with sliding bollard access for vehicles looking to make deliveries or for contractors working on site. We can accept these arrangements and will be able to pre-notify you of deliveries/contractors arriving. 4. Fire services. The local fire brigade have advised us that in the event of a fire in the roof of the Abbey, they would need to access the roof via the Orange Grove / East End side and they would need their vehicles to get between Kingston Buildings and The Abbey. So long as this is possible, we can accept the static bollard scheme around the Abbey.</p>			
	<p>I am shocked to see green street not included in the proposals.</p> <p>I XXXand I'm amazed no-one has been killed or seriously injured yet. Green street as you know is a very narrow one way street, with shops either side of narrow pavements. With the bus gate row on Milsom street, and the inability to actually go anywhere using Green Street due to the Bus gates at the bottom of New Bond Street, it seems very odd that this hasn't been mentioned. This is a very busy little street with high footfall and if your proposals are anti terrorism, then this surely should be looked at. The amount of cars which travel the wrong way down green street is horrific, yet alone the speed at which vehicles turning left into green street travel at. It was only yesterday a car must have been doing in excess of 30mph.</p>				

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City Centre Security project - consultation update

On 19 May 2021 the council published the findings of the independent accessibility study as well as a summary of feedback received during the public consultation that ran early this year.

This was to give people the opportunity to examine the extensive work carried out to address access concerns raised and develop mitigations - all well in advance of the cabinet meeting discussion and final decision.

If people having read the reports wished to add further comments for consideration by the Cabinet they could provide these via an online feedback form. The feedback was invited between 19 May and 1 June 2021 with 64 responses received:

Comments directly related to the consultation reports
The independent study contains a section on disabled access none of this has been taken account of. Those that are not independent to the way they want Bath ie the council have taken no notice of the disabled and the problems their plan for the city has created for them. It is shameful.
The report is unnecessarily long and without any attempt to combine and simplify responses.
This is a complete waste of council taxpayer's money from start to finish. Stop putting up council tax to pay for external consults and consultations that nobody in Bath asked for to fight a terrorist threat that is minimal. We would rather have clean streets, high quality public realm improvements in both the city centre and neighbourhoods, better public transport and a noticeable police presence.
I support the current restriction on traffic in Bath city centre. Whilst this may be inconvenient for a few, the safety of pedestrians and cyclists in the city centre is paramount. Some of the comments relate to potential impact on local businesses by not having through traffic. However, the ability to safely walk or cycle through city, without excess traffic, will encourage people to come and enjoy the city, both locals and visitors. Not only does this help protect against terrorism, but also encourages non-car travel around the city which aligns with net zero, pollution reduction and active travel aims.
This Lib Dem Council is a disgrace. No correct consultations with residents. No proper investigation in to matters. Thousands of taxpayer's money wasted and now paying independent advisors to respond in a manner residents could have done months ago. Utterly disgraceful.

First, the study presents some conflicting complaints that appear to be impossible to address properly:

- Cars can't be banned because wheelchairs aren't a good enough option due to the pavements being too narrow (I agree, it's a problem everywhere in the city - too often the pavements are narrowed to make space for car parking)

- The pavements can't be widened, as we need to have enough space for cars

Have you considered making the pavements and the road level, like Stall Street?

Second, creating "designated cycle and e-scooter" routes in the no motor vehicles area is likely to create conflict - pedestrians will be angry with cyclists riding outside of "their" lanes, while cyclists will be angry with pedestrians walking there. In my experience nobody pays attention to any markings segregating cyclists from pedestrians, unless they are kerb-separated and on different levels. But then we run into the problem with wheelchairs from above. I think it would be a waste of money trying to segregate bicycles/scooters and pedestrians near the shops, as this isn't a transport route and the speeds are already low.

Finally, I do find it insulting that some councillors have only now discovered that there are accessibility issues in Bath.

May I suggest that you focus your attention to the vast number of A-frame barriers, kissing gates, chicanes, bollards with less than 1.5m gap, lack of dropped kerbs, narrow/uneven pavements, and other major problems which have been there for years?

The whole Ring of Steel concept is absolutely ludicrous and un-necessary, coming across as either taking risk aversion to illogical levels, or a sneaky way to pedestrianise, as the cycling lobby wants. The whole plan creates an inefficient Soviet style bureaucracy for residents, removes blue badge parking with no alternatives offered and achieves nothing of note. Whole plan needs scrapping, and if it resurrects, save money and improve quality using local knowledge rather than Consultants writing in a language that only barely resembles English

Any restrictions on blue badge holders entering the security zone should be resisted, and access to residential properties should be allowed at all times of the day and night as well as deliveries to said properties.

The disability report clearly shows that the measures put in are against the equality act. They should be revoked immediately as they are illegal.

I support the proposals. This makes for a safer and more accessible city centre for all. I note the concern for a small number of blue badge holders who currently benefit from free parking very close to where they'd like to shop. I note the council in this document signpost to car parks. Might I suggest that to help encourage blue badge holders to use those car parks that parking is once again, as it was in the past made free to them.

To go back to vehicular access in areas like Westgate Street would be a backwards step for the council. I would also suggest that hand in hand with these proposals more of the highway is offered up for table and chairs for hospitality establishments in the area.

I feel it is important to see the wider threat from terror and the different ways this has been brought to our streets, in Nice with a truck in London with knives and in Manchester with a bomb. We need to consider layers of protection to us all. The Terrorist does not abide by time of day or location but wants to create as much disruption as possible so restrictions such as these are important to reduce the threat and anyone who does not see that cannot see the wider picture we would not want Bath to be part of so by creating such obstructions will help to reduce that threat to all. I fully support the report as a result.

I have read the reports and the independent assessment and I feel the police have used a threat of terror to exclude those who are infirm, disabled or find moving around difficult. The independent report refers to blue badge holders but many people not holding a blue badge find the only way they can get access into the city is by car being it friends or their own. They may well not be eligible for any help but nevertheless are trying to be independent. if the city is insistent to put these arrangements in place the city needs a "spine tram" (it can be an electric bus or similar) which goes from the top of Milson Street to the Bus Station (return) and operates at least every 10 minutes. If infirm people are doing their best to get to the city (from whichever part of the compass) they need some low access help to move them around the central core. You can't just impose limited access without providing some sort of other way of people accessing all parts of the city without having to walk long distances. The proposal seems to solve low level risk identified by police without providing any mitigation for those who have difficulty walking even part of the length of the town!

You should make sure that you realize everything that has been done is in breach of the equalities act section 20 and article 4, 9 and 19 (and I'm sure there are others) of the UN Human rights- committee on the rights of persons with disabilities, at the moment they are fully in breach of both of these with many of the changes that have been made, whose calling them out on this?

As is clearly stated in Steve Maslin's Atkins report, they have not evaluated the Council's PSED (Public Sector Equality Duty) in respect to the EQ (Equality Act) (2010) as this is for the Council's own E&D (Equality & Diversity) Dept & Legal team to do. The PC's include others beside DD (Disability Discrimination).

There is absolutely NO WAY the Council can meet their PSED with ANY barriers left in place.

The wording of the question about "hostile vehicles" is an amazing piece of manipulation. Of course no one wants "hostile vehicles" anywhere so the question is designed to elicit only one answer. That alone raises doubts about the entire "consultation" exercise and appears to suggest that "hostile vehicles" are the only MO a potential terrorist group or individual might consider. So the entire "ring of steel" is predicated on a false assumption which suggests that it is not about protection of the public but rather a way to justify the banning of all vehicles from the city centre.

Comments by TARA:

It seems to us that Atkins have done a reasonable job with the limited brief they were given and while we might quibble with the details and limitations of their recommendations the council has provide an inadequate forum for doing this.

We would however, like to highlight two observations they report:

1. "It seems like this is just tinkering with traffic management without any overall plans for the City Centre - What is the vision for what kind of City Centre we want?"

This for us seems to be a key observation and should form a starting point for a new consultation.

2. The state of the pavements and the muddle of street furniture are a constraint on any access and mobile plans for the city centre.

We note that there are large sums of proposed expenditure for "active" travel schemes most of which is planned to be spent of specialist cycling infra-structure. We would contend that much of this expenditure would be better directed at improving the ability of pedestrians and disabled people to move around the city.

Finally, reading officers analysis of the consultations responses make it clear that there is a bias in designing consultations to making them easy for officers to analyse at the expense of offering residents the widest range of options for participation. This is a bias which, in our view, should be corrected.

The plans are unlawful. The Council is in breach of its Public Sector Equality Duty in making these plans without due consideration for the elderly and disabled, who need access by vehicle to visit city centre facilities. The Accessibility Report findings confirms this. The original Equality Impact Statement is below the standard of due diligence required by law. Mitigation of Equality impact post implementation is insufficient: Equality requirements should have been integral to the plan design. The plan to close roads is a grossly disproportionate response to the security threat. Central Westminster, a much higher profile target, is open to traffic, pedestrians protected by pavement bollards. No road closure was required in the joint Council - Police security plan published in 2018, since then the threat level has been reduced. My FOI requests for the results of the public consultation, and advice of the police on security were denied without lawful justification. The Council sought to evade its democratic responsibilities in this affair, and must revisit Cabinet governance to avoid such debacles in the future.

Things are bad enough now under the present restrictions and if as planned these hours are extended to 24/7 then living will become so badly affected for Blue Badge holders. We are already banned for the city centre shops, banks and restaurants and if the hours are extended, also from theatres and evening dining. I would suggest that my human rights as a disabled person are compromised against an able person.

One suggestion will be to keep the park and ride service running to 23.00 hours but of course this will lead to extra cost and my disability will not be worth it for the Council to consider!

I have never known a Council be so dedicated to destroying this city so completely regarding visitors and shoppers.

As for terrorism, will you stop an innocent holidaymaker carrying a backpack?

Finally who decided to put replies on Excel??

From the results of the public consultation, it is obvious that there is no overwhelming support for this scheme. This despite question 1 clearly using bias in an attempt to get consultees to agree to the need to "protect people from hostile vehicles". This is clearly a leading question and arguably invalidates the whole survey. An unbiased question would have asked something such as "In your opinion is there a need to protect people in these city centre streets from vehicle based terror attacks?" Had an unbiased question been used it is likely less respondents would have answered agree or strongly agree.

For all the other questions roughly 40% are in favour and 60% against, confirming the lack of support for the scheme in its current form. As stated in 4.2 the respondents were self-selecting, not chosen at random, but as per Cabinet Office guidance issued in 2016 the product of consultation must be conscientiously taken into account in finalising any statutory required proposals.

More concerning is the Accessibility Study which clearly identifies the negative impact this proposal will have on those with mobility difficulties, who are blind or partially sighted and those with dementia, as well as the impact on those that live within the scheme area. This should have been undertaken before the proposals were put out to public consultation and should have informed the design. At a time when the Council should be implementing measure to increase the number of people living within the city centre, creating an environment where deliveries are nigh on impossible will achieve the opposite.

This leaves the question of how the Council responds to the advice provided by the CTSA's. I tried to obtain a copy of the advice using an FoI request but it was rejected on security grounds, and therefore I can only speculate on the content. Were the CTSA's themselves responding to a leading question from the Council such as "would restricting vehicular access on these streets reduce the chance of a terrorist attack using a vehicle" to which the CTSA's would have to answer yes, or an open question such as "what actions should the Council take to reduce the threat to the public from a terrorist attack in the city centre?". Ultimately the Council must consider whether spending £2.3 million on this scheme is really justified, particularly

in light of the severe financial consequences of Covid-19, or whether that money could be better spent on other priorities.

I believe these plans are in direct breach of the Public Sector Equality Duty and the Equality Act. These plans without any consideration for the elderly and disabled, who need access by vehicle to visit city centre facilities with the Accessibility Report findings confirming this. In times of greater terrorist threat these measures were not deemed necessary so should not be deemed necessary now.

Having read all the documents, I see that a majority are against the proposals. But I ask again that the car owning City Centre residents with C zone permits, are given consideration with regard to parking. Now that tourists have returned to Bath, many parking spaces are being filled with permit holding hotel and B&B guests. On the odd occasion I use my little car for a journey out of Bath, I have the worry of finding a space on my return.

It is very clear from the accessibility study that the consultants failed to address the fundamental issues that not only are a problem for the city centre but also for the city and North East Somerset as a whole. The public realm is extremely hostile to wheelchair/mobility scooter users and the Visually Impaired and the study gives up and recommends that the car is a way to overcome those failings. If councillors are going to use cars as shopmobility then they have failed to understand and fix the underlying issues or even understood that disabled households have less access to cars than the average household.

What the council should be doing is using the £20m Levelling Up Fund granted to the Bath constituency to fix Bath's public realm, particularly high streets, and make these spaces fully accessible with shop mobility services attached to existing car parks. Not give up and have cars used as shop mobility devices on busy high streets that only a privileged few have access to.

The consultants acknowledged the hostile nature of the public realm in the executive summary but gave up defaulting to "the car" as the answer to overcoming poor public realm. They should have done significantly more work on identifying how to fix the public realm, not just in the city centre, but across the whole of Bath.

Cars are a vital form of transport for many disabled people, but as shop mobility, they are simply a very poor sticking plaster and one that is unfortunately only available to more well off. Fix Bath don't hide behind cars.

I wish to support in broad terms the approach that B&NES Council is taking. The issues of accessibility for people with disabilities of any kind are of course important. However specific questions of access from point to point need to be balanced against the generally improved experience arising from traffic-free roads. This will considerably advantage people with many kinds of disability, as well as being a welcome improvement for pedestrians in general.

Some access comments relate to the terrain in Bath, and we can't change that. Many more relate to specific issues about dropped kerbs, improved surfaces etc which can be changed (although not the cobbles which add to the historic and visual interest in several areas). My personal view is that there is little wrong with the general thrust of these proposals, and broadly I support them, but that considerable attention needs to be paid to minor improvements that help with the experience of those with disabilities.

I remain seriously concerned that should this proposal be accepted, I and others like me, would be considerably disadvantaged as a consequence. I applied for and was issued with a blue badge because of mobility issues and my need to be able to park near where I need to be. Constant pain, slow walking and a long recovery period makes the option of parking in a car park unfeasible for me. Also the idea of drop off zones would not work for me as I am the driver. According to the Disability Act the proposed plan would unfairly deny me from facilities like my banks, the post office, library etc. in comparison to able bodied people. I've lived in Bath all my life and am saddened to feel I will not be able to visit, despite living what was for me a 15 minute walk from the centre. I also feel that more effort should have been made to find out views on this matter. Surely there is a register of blue badge holders, most of whom could have been contacted by email or letter? An additional thought is regarding the reliability of a terrorist motorist attacking between 10.00 and 18.00 hours & not during large events like The Christmas Market. Common sense says that this does not preclude rush hours or indeed evening hospitality trading.

I have to return to the Chief Constables words of PROPORTIONATE/HIGH FOOTFALL/PEAKTIMES

The city centre proposals as drafted exceed those parameters and must be seen as fulfilling an agenda of ridding the city centre of cars and vehicles.

We must not lose sight of the removal of on street parking bays, Disabled parking bays and yellow line parking which has taken place over preceding years. The Atkins report is unequivocal that this shortage MUST be reinstated and NOT shifted into carparks because they lie outside the distance a BB Holder can walk if they qualify for a BB.

Independence and dignity MUST be maintained.

I support the proposal that BBH be permitted to enter the restricted zone and this should be maintained throughout the 24 hour period. I can see that the adviser has tried to accommodate some measure of restriction by suggesting permits but I believe this will be likely to prove costly. The other problem when talking of NEED to access the city centre is who defines that need? Similar problems exists on the issue of a geographical area or hinterland..who sits one side of a boundary or the other side? Banes already hold personal details of all its blue badge holders so there should be no issue with allowing automatic access 24 hours per day for these people via ANPR cameras. The RUH operates the system of vehicle registration for BBH and TFL allows holders of BB to register 2 vehicles to be exempt from the congestion charge. A computer system could be developed for Banes residents and a similar registration for regular visitors to Bath, those who work in the city but who do not have Banes issued BB. Tourists could apply for temp permits.

Any suggestion for time limited (duration) access must take account of the need to park in the area for cinema visits and theatre performances which may be longer than 3 hours.

Taxis, again licensed vehicles, should be allowed 24 hour access to be of service to elderly people and vulnerable such as women at night and those suffering temporary mobility impairment, those with sight loss etc.

Banes must look at plans for essential services eg banks and building societies to move into the pedestrianized area. Post Office should not have been allowed to relocate to WHSmith. Kingsmead Sq and Milsom St should be looked at within the total of the plans for the city centre.

Please take on board comments from stakeholders as these are heartfelt comments from real people who are anxious as to their future in Bath.

General or additional comments

It's worth pointing out that as a pedestrian on the pavement I am about 5 times more likely to be killed by a vehicle than a terrorist incident.

I suggest that there may well be a case for protecting pedestrians at points where there is a danger of vehicles mounting the kerb and of course pavement parking.

More to the point however given that we recognise that vehicles can be used as weapons, why not direct police resources to those who play the fool with vehicles and treat them like knife & gun offenders not hand out £30 fines?

It's clear B&NES will use any excuse, such as an ill defined "terrorism" threat to further its anti-car agenda, while doing nothing to support the residents & businesses who have no choice but to depend on cars due to the lack of alternate provision.

Being disabled, it is already impossible to shop in Bath, my home city. Driving to the shops is limited as so many pedestrianised streets. Visitors must be put off. What has increased the terrorist alert? It sounds like a huge Council rip off. Where is the money coming from? Spend what you have in a more responsible way and stop increasing our taxes. Are you going to do the same in Keynsham, Midsomer Norton etc.

It makes no sense to make Milsom Street a No Access Road. It makes vehicles do longer journeys and increases pollution, which I thought BANES wanted to reduce.

Consideration should be given to removing the stupid bus gate by Waitrose; as again vehicles have to make longer journeys especially from Lansdown to Train/Bus stations.

The Ring of Steel is a sledgehammer to crack a nut approach, terrorist attacks would most likely be carried out by lone-wolf terrorist on foot to get inside the inner area.

Just look at Reading Park,UK attack 3 stabbed & killed,further afield 2012, Mohammed Merah killed seven people in Toulouse, France, August 2017,Paris 2015: Gunmen and suicide bombers hit a concert hall, a major stadium, restaurants and bars, almost simultaneously - and left 130 people dead & hundreds wounded,(could easily do same to Theatre Royal, restaurants & bars in Bath) & finally Abderrahman Bouanane stabbed 10 people in the city of Turku, Finland. Just a few examples.

I do not agree that we need a safe zone, or any of these ridiculous measures. Open the City and keep it open for access to all.

I am a street trader that operates from pitch # Union Street and I require access to my pitch via Cheap street. Previously I traded on a pitch on York street and required access through Stall street where the barrier existed. My vehicle registration was included on a white list which enabled the barrier to drop down and for me to access my pitch before 6pm to load. This was removed once the Covid measures were put in place and now remains as a result of the security access. Restricting access before 6pm has created the 7 pitches along Union street to jostle for space to park their vans in a space only suitable for 3 vans at a squeeze. Where before the stall holders would leave at staggered times, anywhere between 4.30-6pm, this eased the congestion on upper borough walls at the top of Union street and did not cause an issue for pedestrian access as it does now. This access issue is particularly annoying on a Sunday when all the shops are closed by 5pm and we have to wait an hour later before we can bring our vans through to start loading. It's also an issue during the quieter times of the year when the footfall drops off considerably by 4pm. It is unfair to keep traders stuck at their stalls, creating a longer working day unnecessarily. Stall holder vehicles should have their vehicle registrations included on white lists as they previously were to enable us to operate our businesses without hindrance. Access is a necessary requirement after 10.00am and before 6pm for street traders and poses no security risk to the city.

Disabled should not be denied access

this idea is just plain stupid the threat is not from vehicles causing the type of terrorism it's from gun and knife attacks and it would just happen on another of many roads elsewhere where there is high footfall it is not needed by any one and would be very detrimental to residents and business alike have a bit of common sense it is the most stupid idea I have heard from a bath council in the 40 years I have lived here

I have never had an issue with cycling in Bath. During lockdown it's been fantastic to see the uptake in cycling throughout Bath centre and people able to commute actively. The more bikes, the merrier. It's stops polluting cars taking over the city. Cycling around Bath should be encouraged and not limited.

From my perspective, the proposals regarding the exclusion of blue badge holders effect my wife and I directly. We had enjoyed the parking in the centre of the city to facilitate ease of access to local shops and businesses. Without this valuable benefit we will be forced to shop elsewhere or online. This along with other proposals will ultimately sign a death warrant to the businesses and shops of Bath.

I am a fervent supporter of pedestrianising central Bath, and thus bringing it into line with so many similar towns all over Europe. As for disability access, I am deeply sceptical. There is a scandal about the privilege many of these people have, parking where they want on yellow lines etc (apart from the rumours one hears of how people obtain these privileges). At Waitrose, for example, they park outside rather than in the car park. There are alternatives for them and to sacrifice pedestrianisation because a few selfish people are grumbling would be totally unacceptable. BANES has for far too long, been subject to the voting predilections of those with vehicles coming in from outlying areas. This sacrifices the potential to massively upgrade public spaces in the city centre and to ease car access, and cutting pollution. I have serious doubts that the Council has the will to bring Bath into the 21st century, making the city attractive to those providing jobs other than in tourism. Tourism destroys cities and communities. The point at issue is upgrading of public spaces, closing streets, allowing pavement cafes, etc. The city will then thrive if this is complemented by promotion of alternative employment, city centre housing

and good, contemporary office spaces. I cannot believe that a disabled minority that manages to be served in so many pedestrianised other cities will prevent Bath progressing.

The proposed changes to restrict vehicles in the city centre should also be considered with regards to climate change, vehicle emissions, risk of road traffic collisions between vehicles/cyclist/pedestrians. Bath council should lead and be proactive in acting in the best interests of the city and reduce vehicle journeys through and within the city.

The LibDems city centre "Ring of Steel" exclusion zone is a terrible idea and is money wasted. How dare this council discriminate against Blue Badge holders and the huge number of people with mobility issues.

No good will come of this dreadful proposal and the people of Bath are against it.

Preventing cycle access is a disproportionate response to potential concerns of disabled residents, and other factors such as reacting to climate change also need to be considered.

As a banes hackney carriage owner/driver who specialises in wheelchair transport I am very concerned about the access for elderly and disabled residents and visitors to our great city, the road closures we have had already during covid 19, Cheap St, Westgate St, Sawclose, Upper Borough Walls not to mention Milsom St have already caused great hardship in our ability to provide a vital service to these groups of people who find walking or being pushed in their wheelchairs any distance extremely difficult

If the ring of steel is introduced to Bath this will cause even more extreme difficulties to very many residents and visitors as it will restrict access even further to so much of our great city

Also it looks like the taxi rank situated in Orange Grove which has been in place for over a century and is essential to over 120 self-employed BANES licensed hackney carriage operators who are already struggling to make ends meet, will be moved or possibly just closed!!

Taxis ranks need to be in the center of any city and be accessible to all ages and abilities

I don't feel that the people of Bath will see this online consultation in time - people need time to make up their minds and shouldn't be rushed.

Please tell me how by shutting the streets it will make a difference. All you've done is denied the disabled access to shopping areas. I'm sure if a committed terrorist wanted to plant a bomb they could walk or cycle in with it stuffed in his backpack or are you going to check everyone's bag who comes into the town centre. Why now ??? This is all about the CAZ not terrorism. Just another excuse.

It is my opinion that the heavy-handed response to a tiny possibility of a terrorist attack in Bath is just nonsense. If a terrorist wants to attack, he will. No bollards or police officers are going to make a blind bit of difference to the outcome.

Our historic city does not need barricades. What the Council needs to do, is paid to do by Bath residents, is get rid of double-decker buses (except tourist buses), provide parking for the elderly or disabled and give access to those trying to work for a living and who need a van or vehicle.

We don't need costly consultations; we need common sense solutions to benefit us all. Look at bicycle lanes sensibly not in the 'do-good' manner that has been adopted and just accept that for the ageing population who use their cars, cyclists have to be accommodated despite paying nothing towards the costly lanes and the reduction in our road widths.

We have as much chance of being struck by a meteor from Mars as suffering a terrorist attack.

There is a very, very small risk of a terrorist attack. With these measures in place there will still be a very, very small risk of a terrorist attack. If I were a terrorist I would not be put off by these measures, they are easy to avoid, the backpack would be the obvious weapon. The disruption to the lives of Bath citizens and visitors is not justified by the rewards.

I am against the security measures proposed by the council as I believe they will be of very limited protection because any determined terrorist (and most are determined enough to die for their misguided cause) will simply choose the many alternative methods of attack used including indiscriminate knifing, suicide bombing etc., as we have sadly seen on many occasions. Therefore, I believe this project will be a wasted expense of ratepayer's money in terms of achieving its goal.

I also believe it will be detrimental to less able visitors to Bath city centre as it will be more difficult for Blue Badge Holders to gain access.

NOTE: I was appalled by Councillor Appleby's callous response to a disabled citizens recent concerns about this and hope this is not a reflection of the council's attitude to its ratepayers. Has any apology been provided by this council on this matter?

On almost all occasions my wife and I walk into the town, but there occasional times when need to drive into the town to drop off each other or to pick up a large items from shops in the centre but if we are stopped from doing this we will simply have to go elsewhere. I am sure we are not unique and if this is the case, I fear more shops will close and revenue from Business Rates and Shop rents will be reduced for BaNES.

Please count my wife and I as strongly opposed to this proposal.

I am strongly opposed to this proposal as I believe it will be detrimental to the residents of Bath, particularly those with disabilities. This is such a lovely city which needs B&NES to concentrate on reviving its economy post covid. I can't see how this proposal will help this in any way. It is ill conceived as the measures will not deter terrorists.

This response of the ring of steel is disproportionate to the threat. There is no reasonable adjustment for the disabled. It appears yet another tool to remove cars off our streets - which is fine but it should be honest rather than hiding behind a terror threat

Somehow missed this consultation.

I am a Bath resident and not disabled.

For the rest of the consultation I would select "strongly disagree".

Complete nonsense. Bath offers no more security risk than any other popular city - also most terrorists operate on foot. This feels like another attack on the car in line with WEF policy's on Smart city's and LTNs - funded by the govt as part of their green build back better agenda 2030. If you continue to block off Bath and fill it with lumps of tarmac, ugly plastic barriers and cheap bits of street furniture people won't visit. The place will die and along with it your ability to collect rent and tax. The latest scam of luring unsuspected visitors into badly sign posted CAZ roads like Milsom St, then fining them when they don't even know they have done anything wrong, won't bode well either. If this is about the car - just fess up and say so. Also if you want proper opinion then write to every Banes council tax payer (you do when you want our money), as opposed to hide your consultation behind some online survey that only those in the know and pro the idea are made aware of. Ltn's is a very good example of this too. Ps of traffic is an issue then build a bypass instead of fining motorists

Personally I would very much welcome fewer cars in the city. I live in Fairfield Park and always walk or cycle into the city. My only reservation regarding the walk or cycle has been the pollution, noise and potential danger caused by the number of vehicles and traffic jams I encounter on my walk or ride although I am grateful for the cycle lanes. I have recently been prescribed an inhaler for asthma possibly caused by the level of pollution in the city especially around the London Road area. I think the ambiance within the city would be much improved by food and drink being served outside on pedestrianised streets such as we see in a lot of European cities which would increase the capacity of outlets and indeed profits. It would make the city more pleasant and civilised and less stressful. Although safety is important, I am not in favour of such streets being lined with bollards but would prefer to keep cars out of the city altogether. I understand that deliveries will have to be made early in the day but that could be arranged before say 9.00 in the morning when fewer pedestrians are using the streets. I also understand that there are people with disabilities who are unable to walk but this is not the majority and I am sure some innovative ideas could be used to allow this minority access using golf buggy type electric vehicles or something similar. I am no expert but there are experts who can advise. I feel really strongly about this issue and want to make sure that the views of walkers and cyclists concerned about the health of us all and the planet are set alongside those who feel it is their right to use their car for every journey.

This ring of steel is grossly unfair and discriminatory to disabled people. The terror threat has been with us a long time, why now? Is this the only way a terrorist attack can be carried out in the city? No. This ring of steel is not about protection against an act of terrorism, it is about traffic control. Stop pretending that it isn't.

<p>As a Bath resident who lives outside the city boundaries, I wish to add my concerns to those already expressed about the further restriction of access to the city centre. As someone with restricted mobility though not registered disabled, I find it increasingly difficult to access the city centre at all. My husband and I suffer from serious mental health issues that mean we are not always able to use the bus, especially since the onset of the pandemic. The current restrictions on parking are problematic but to reduce access to the centre further without providing alternative routes means that we are effectively deprived of access to amenities in the city centre. The proposals do seem like an attempt to introduce pedestrianisation by the back door. This prioritises the needs of visitors over those of residents.</p>
<p>I think the proposals will be extremely damaging to already struggling city centre businesses & are entirely disproportionate to the perceived terrorist threat. It smacks of an ideological war on motor cars rather than a sensible response to terrorist danger.</p>
<p>I am disabled so bring back parking or will not come into town again</p>
<p>This poorly disguised attempt to further limit vehicular access to central Bath is flawed. Even if there were a risk of attacks in central Bath from 'hostile vehicles' any reasonable 'hostile vehicle driver' would simply carry out their evil attack in a street NOT covered by your cunning ring of steel. This ill thought out 'plan' will protect nobody and cause no end of inconvenience for residents and businesses both in the area and those in the wider area needing vehicular access from time to time.</p>
<p>Please do not shut Westgate street, saw close and upper Borough walls to cars 24 hours a day. Disabled people and delivery drivers need access to these roads.</p>
<p>It is already extremely difficult for anyone with a disability to access the city and these proposals would, in effect, deny my partner access to anywhere. He could not get to the only optician with a ground level consulting room, nor visit the book shops which are one of his sole pleasures. We already struggle to vacate the nearest parking to vision express by the 10am closure and, sadly, he is unable to use public transport. I understand that there are security concerns but they must not be allowed to outweigh the needs of blue badge holders (of which there are many) as that denies them too much.</p>
<p>Ridiculous</p>
<p>Stop punishing small businesses in Bath. All this 'build back better' ethos was never put to a vote before the last elections, yet all this council does is shut down the city centre, shut down access roads, penalise law abiding citizens who can't afford more modern cars. Why do you hate us?</p>

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Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Cabinet	
MEETING/ DECISION DATE:	20th July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3260
TITLE:	Bath City Centre High Street Renewal	
WARD:	Kingsmead Ward – Bath City centre	
AN OPEN PUBLIC ITEM		
<p>List of attachments to this report:</p> <p>Appendix 1: Love Milsom Street Event 2019 Evaluation Report</p> <p>Appendix 2: Bath City Centre Love our High Streets Summary Scheme Proposal (July 2021)</p>		

1 THE ISSUE

- 1.1 A £1.235m funding package to support Bath High Street Renewal has been secured from the West of England Investment Fund's 'Love our High Street' grant programme. A proposal put forward by B&NES Council via a Full Business Case focused on the northern part of Bath City centre, combining targeted public realm interventions with support for events, animation and culture on the streets and in public spaces focused on the Milsom Quarter and Kingsmead Square, together with other city centre wide interventions relating to outdoor trading. The project will support the Council's Liveable Neighbourhoods agenda and seek to respond to the Climate and Ecological emergencies and the transition towards greener, less car dominated and accessible, people friendly High Streets.
- 1.2 This report requests agreement to accept the £1.235m funding from WECA in line with the Full Business Case approved by WECA on 25th June 2021. This report summarises the proposed project scope and includes economic and social impact analysis and a summary of pilot activities and engagement which has informed the project scope. The Report summarises key items of proposed spend, funding approval mechanisms and key deliverables and outputs anticipated.
- 1.3 In addition, B&NES's proposal to access the WECA Recovery grant fund to support a 'vacant unit action project' (phase 2) capital project, to bring animation, temporary arts and commercial uses to vacant shop premises focused in Bath, with satellite projects in Keynsham and Midsomer Norton was also supported by WECA on 25th June 2021. This project is now subject to delegated approval of a

business case, by WECA's Chief executive in consultation constituent council's chief executives. This report also seeks confirmation to proceed with the second phase of this project, following delegated approval.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Delegate approval to the Director of Place Management, in consultation with the s151 officer, to accept the £1,235K Love our High Streets grant from WECA to be spent over a five year period in line with the Full Business Case and concept design approved. This will allow full approval of confirmed capital of £1,102k for Bath City Centre High Street Renewal and provides £240K for revenue budget support as outlined in section 5 of this report.
- 2.2 Delegate approval to the Director of Place Management, in consultation with the s151 officer, to accept £255k from the WECA Recovery grant offered to deliver phase 2 capital works to bring vacant shops back into active use for cultural and commercial and arts initiatives as part of the 'vacant unit action project'. The split between this programme and Commercial Estate Refurbishment and revenue budget support to be confirmed.

3 THE REPORT

- 3.1 B&NES Council secured £1.235m Love our High Streets grant funding for Bath City centre from WECA via a Full Business Case, approved by WECA on 25th June 2021. The rationale for the focus on Bath City centre, including Milsom Street, was the decline in footfall and vacancy rates higher than city centre south. This followed investment by SouthGate of £2.5m to support public realm, animation and events in the south of the city centre, the proposal is to undertake similar activity focused around the northern part of the city centre centring on the Milsom Quarter, with additional investment also directed towards Kingsmead Square and city-wide through an outdoor trading project.
- 3.2 To support the development of the Full Business Case, initial funding of £115k was released by WECA, this funding was used to fund officer time and the delivery and development of various pilot activities, projects and consultation activities which have informed this bid. Alongside the production of the Full Business Case, other key outputs have included:
 - a) Pilot initiatives such as the design, delivery and implementation of the Love Milsom Street Event in September 2019, which closed the street to vehicles, diverted buses and invited local businesses and artists to join us to create a street party on World Car Free weekend. Work also included follow up evaluation and engagement with businesses and traders. In 2020 event was awarded the Best UK Campaign Award for sustainable transport activities as part of the European Mobility week. See **Appendix 1** for Event Evaluation Report.
 - b) Co-funded projects with Bath Business Improvement District including City Centre SMART footfall data project launched in 2019 and technical scoping

work for a Bath Light Festival (realised at Christmas 2020 through the delivery of the Bath BID's Christmas Lights Trail).

- c) Co-funded project with B&NES Events Team Sept-Dec 2020 to deliver shop window animations and artistic interventions working with local creatives, including set and costume designers who had been unable to undertake their normal work during the pandemic. This project has been recognised as a national best practice case study by the Local Government Association.
- d) Officer time to design and project manage the delivery of the city centre public realm improvements to Union Street and Kingsmead Square developed through public consultation and engagement with local businesses, landlords and Bath BID.
- e) Officer time to design and deliver High Street interventions such as parklets on Milsom Street and support for pavement licences to support outdoor seating for food and beverage businesses,
- f) Production of a design guide and design support for businesses to support the successful roll out of pavement licences, following COV-19 legislation changes.
- g) Technical and design support for the COV-19 vehicle access restrictions delivered in Bath City centre.

3.3 In addition, officer time funded by this project has also secured an additional £500k from the WECA Recovery Fund, to support pilot activities, meanwhile uses, pop-up shops and art installations in vacant shops focused on Bath City Centre, with satellite activities in Keynsham and Midsomer Norton. An initial £245k has been released with a further £255k now due to be released and has been delegated to WECA Chief Executive for approval. This budget is split £255k capital funding and £245k revenue funding.

Bath City Centre Love our High Streets Project Scope

3.4 The overall aim of this WECA funded project is to improve the experience for residents and visitors at two key gateways into Bath City Centre Milsom Street and Kingsmead Square. Whilst both areas have benefitted from public realm enhancement in the form of hard works, in both cases this was 20 years ago and there is an now opportunity to refresh the areas with new street furniture, heritage repairs, planting/greening, support for café culture with outside tables and chairs, and other interventions to rebalance the spaces in favour of pedestrians and active travel as well as providing a programme of animations and events. An outdoor trading strategy and electricity infrastructure investment will also support visual enhancements across the city centre and allow a move away from a dependency on polluting and noisy generators.

3.5 The Love our High Street scheme will support the Council's adopted Placemaking Plan in particular policy D.10 Public Realm, and the Council's adopted Public Realm and Movement Strategy, in particular the aspirations to:

- a) Rebalance the movement hierarchy giving priority to pedestrians, cyclists and public transport and improving accessibility; and

- b) Reanimate the city centre through an imaginative and pioneering programme of public art events and activities (including street trading).

3.6 In addition, street furniture and lighting interventions will follow the Pattern Book street furniture palette. Considerations of ecological and climate emergencies will also be made when sourcing products and specifying planting and materials and there is an increased emphasis on greening and supporting active travel. The delivery of the project links with the Council's Clean Air Zone and Liveable Neighbourhoods initiatives which seek to improve air quality and quality of life, prioritising accessible and people friendly spaces which are less vehicle dominated.

3.7 The project also supports the delivery of key aspirations in the adopted Bath Transport Delivery Plan including promoting sustainable mobility, safeguarding and enhancing the unique historic environment and improving quality of life in the city.

3.8 In terms of the emerging One Shared Vision, the proposals respond strongly to three of the emerging themes: Supporting the delivery of a 15 minute neighbourhood where High Streets need to support local residents community needs and leisure and recreation functions as well as providing retail and food and beverage offers; Nurturing transition to heritage for the future the proposals support areas in transition where there have been higher vacancy rates and through the proposed planting, active travel and low carbon aspects of the scheme supports the environmental aspects of the vision.

3.9 Key elements of the scheme proposal are summarised below:

Project 1: Milsom Quarter Animation and Activation Project

3.10 The Milsom Quarter project will include the following elements, subject to detailed design and delivery working with key stakeholders:

- a) Reconfigured and replacement of existing street furniture in the palette set out in the Council's Pattern Book;
- b) Parklets, cycle parking and movable infrastructure to facilitate outdoor café seating areas and pavement licences.
- c) Heritage repairs to hard works such as sets and threshold treatments to indicate people have priority over vehicles;
- d) Seasonal street dressing and lighting interventions;
- e) A five year programme of public art, events and performance.

3.11 This workstream will be completed by works to animate, and bring back into creative and repair, restore and refurbish re-use vacant shops and buildings. The scheme forms part of an improvement Strategy for the Milsom Quarter area, and a Masterplan is in development to help determine the longer-term opportunities for this area responding to the decline in demand anticipated for retail space.

Project 2: Kingsmead Square Animation and Activation Project

3.12 The Kingsmead Square project will build on an existing programme of improvements to the square which have been implemented or are funded. It will include the following elements, subject to detailed design working with key stakeholders:

- a) Surface treatment to reinforce pedestrian priorities;
- b) Overhead street dressing and lighting including infrastructure;
- c) Green wall with planting and bench at the end of Kingsmead Street;
- d) Feature bench and tree improvements on Avon Street, to replace a street tree that is in a poor condition.

Project 3: City-wide projects

3.13 The city-wide projects will include an outdoor trading strategy to deliver improvements to the street trading offer and aesthetic and enhanced infrastructure to be used for events, street trading and markets (ground-based electricity points) to avoid the need for polluting generators to be used. The improvements to electrical infrastructure will facilitate support for electric charging and low carbon events infrastructure;

3.14 To deliver these projects the funding will also support officer capacity to undertake project management, design, delivery, monitoring and bidding for match funding as part of the Bath City Centre High Street Renewal Programme.

3.15 The Love our High Street scheme proposals are outlined in **Appendix 2**. While a certain level of detail in terms of design and costing is required for the funding application, there is flexibility within the programme to adjust spend through discussions with WECA and to undertake detailed design working with key stakeholders and to undertake public engagement exercises on detailed designs where there are key choices to be made.

Vacant Units Action Project Scope

3.16 The Council is utilising WECA Recovery Fund grant funding to help bring vacant ground floor shop units back into active and innovative use. Post pandemic High Street vacancy rates have increased nationally, this is reflected within Bath City centre. In the market towns, although vacancy rates have actually decreased in the last 18 months, there are still vacant properties which can be better utilised for community and business benefit. This two-year project will see empty properties brought into use for creative arts and cultural projects and pop-up business and community uses. Phase 1 focused on revenue-based projects supporting arts, creative re-use, community initiatives etc., and has already started - supported pop-up galleries, artists and community pop-ups and technical work, business, university and landlord engagement.

3.17 Phase 2 focuses on capital improvements to properties focused on Bath City centre, the project seeks to bring non-compliant properties up to a standard and condition where they can be re-occupied and utilised for pilot interventions before being re-let on the open market. For example, this WECA funding can facilitate properties to be improved enough to be utilised as they await further investment or separation works.

4 STATUTORY CONSIDERATIONS

- 4.1 Elements of the High Street Renewal package include works which will require highways consents including Traffic Regulation Orders, actions under Street Trading and Licencing legislation and other Council consent processes such as events licencing, streetworks permits etc. It is not proposed that the scope of the Love our High Streets work will trigger planning, advertising or listed building consents, however, this will be kept under review. Both Kingsmead Square and Milsom Quarter projects are supported by timed vehicle access restrictions which will be funded, consulted on and implemented in parallel to this project.
- 4.2 Terms and conditions of government funding including consideration of state aid, best value and competitive tendering etc, form part of scope of work and will need to be followed throughout the course of the projects.
- 4.3 Improvements to public space and events will need to consider equalities impacts and support sustainable development including supporting modal shift towards walking and cycling. An accessibility audit has been undertaken to inform the scheme proposals working with an accessibility professional.
- 4.4 Capital works to buildings as part of the vacant unit action project may require listed building consent and or planning permission, and will need to meet building regulations. Framework contractors will be utilised to undertake the work which will be focused the public sector estate and consents will be in place prior to commencement.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

Capital Budget

- 5.1 An approved capital budget already exists for Bath High Street Renewal and forms B&NES match funding to the WECA grant. Capital funding of £593k is already fully approved, of which £205k was spent over 2019/20 and 2020/21. The WECA grant funding will add to this existing capital budget by £1,102k to support further public realm interventions in the Milsom Quarter, Kingsmead Square, Union Street and York Street and elsewhere in the city centre.
- 5.2 The £1,102k provisional capital budget for the Bath High Street Renewal Programme includes:
 - (1) The WECA Love our High Streets grant funding (£995k) and £300k Community Infrastructure Levy (£100k allocated to the 2021/22 provisional capital programme and £200k requested - £100k over 2022/23 and £100k over 2023/24).
 - (2) A £7k revenue contribution to capital has been earmarked in 2021/22 from the Licencing team towards project 3 outlined in the FBC (outdoor trading). In terms of external match funding, Bath BID is providing a £30k p.a. contribution (total £150k in-kind contribution) by providing access to city centre monitoring data to help assess the impact of the schemes. It is anticipated that businesses at Kingsmead Square will be making a £25k third party contribution to support project 2 in the FBC (subject to funding agreement).
- 5.3 When the WECA Love our High Street Funding is confirmed, Delegated Approval will seek Full Approval in the Capital Programme for £1,102K, schemes

relating to confirmed sources of funding; noting that future CIL of £200K is only confirmed in light of CIL receipts received in prior financial year and that we await for receipt of contributions from businesses at Kingsmead Square.

- 5.5 The provisional capital budget for the Bath High Street Renewal Programme also currently includes assumes WECA Recovery funding at £255k, which is still subject to Business Case Submission ahead of delegated approval by WECA Authority Chief Executives.
- 5.6 A separate report for consideration at this meeting is E3293 Commercial Estate Review Update which requests approval of capital budget to invest in the estate address maintenance liabilities. It is anticipated that the WECA Recovery fund may be used to fund some works to bring some of the vacant units back into use and supplement the Commercial Estate Refurbishment Programme, reducing the scope of this provisional budget for full approval to this scheme.

Revenue Budget

- 5.4 The revenue costs for the programme total £240k to be met from the WECA Love our High Streets funding. Programme funding provides revenue for a 1.0 FTE Senior Officer to oversee and deliver the projects for the 5-year project period. Specialist urban design support and events development and delivery support will also be provided as part of the project. Further details of the funding breakdown are included in **Appendix 2**.
- 5.5 Elements of the project will incur revenue or maintenance savings and/or additional costs, these will need to be considered as the project is developed, such elements need to be factored into design decision making processes. A Bath City Centre annual maintenance revenue budget of £15,000 per annum from 2021-22 has also been secured, which will support the implementation of this project and help address existing issues and shortfalls. This scheme also includes maintenance budget for items installed within the parameters of capital funding (maximum 5 years).
- 5.6 In addition, £245k revenue budget has already been fully approved as part of the WECA Recovery Funded 'vacant unit action project' to support art installations, pop-up shops and other pilot interventions in vacant shop units in Bath. Keynsham and Midsomer Norton.

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7 EQUALITIES

- 7.1 The detailed design and delivery of projects will need to address and consider equalities impacts, as a key part of the detailed design process.
- 7.2 In addition, the community engagement and cultural programme elements of the Love our High Streets project will also need to consider inclusivity and accessibility as part of their detailed public realm scheme design and in the delivery of events/activities. Recommendations to this effect are included in the Equalities Assessment accompanying this report. The Equalities Assessment

has been informed by input from an accessibility specialist engaged by the Council.

- 7.3 Since submitting the FBC to WECA for the Love our High Streets project, the High Street Renewal team has continued to work closely with the highways team to ensure that opportunities to improve accessibility to the Milsom Quarter and Kingsmead Square are realised through this Love our High Streets scheme. Replacement and additional seating will be provided throughout Kingsmead Square and Milsom Street at a minimum of 50m intervals, to ensure there is adequate resting space to allow the street to be used more easily. The project will de-clutter the public realm and layout the new furniture in an accessible way to accommodate ease of movement through the space. The furniture will be fully accessible with a range of seating types including perch seats, backrests and armrests. Visual clarity will be designed into the street furniture with materials used that contrast with the immediate surroundings and surfaces.

8 CLIMATE CHANGE

- 8.1 The focus of the Love our High Streets project is to support the vibrancy and vitality of the High Street which will support 'buy local' agendas, elements of the project support outdoor events, outdoor trading and markets, which will attract local residents. The projects are also underpinned by improving the environment for pedestrians, cyclists and users of public transport and prioritise these modes. Improvements to electricity infrastructure will also help to minimise the use of polluting diesel generators by street vendors and during events.
- 8.2 Procurement of street furniture and restoration works to buildings will prioritise natural materials and sustainable sourcing. The project scope also includes greening and planting which can help reduce urban heat island impacts and improve biodiversity.
- 8.3 The vacant unit action project will ensure better use of existing resources, and opportunities to improve energy efficiency will be sought as part of capital projects.

9 OTHER OPTIONS CONSIDERED

- 9.1 There is an option to not accept either grant and to not progress the High Streets Renewal programmes or to re-scope parts of the projects. However, our High Street are in urgent need of support, and releasing funding now will allow the benefits to businesses and the community to be realised as soon as possible.
- 9.2 Another option would be to focus the Love our High Streets grant funding on hard landscaping works, however, the impact and coverage would be more limited. The proposed programme aims to bring maximum benefits and animation to support footfall and economic vibrancy.
- 9.3 Work to demonstrate the economic and social benefits of the proposed Love our High Streets scheme prepared by Turley Economics highlights that the interventions proposed will have a significant economic uplift including supporting the creation of 48 FTE jobs and 20 net additional FTE, (including 15 for WECA residents and 10 for B&NES residents) and that the scheme proposals will contribute a net total £6.5 million GVA over a five year period and will attract an additional 316,000 people over weekend events on Milsom Street

generating an additional £5.4m net additional expenditure over the next five years. In terms of gross social value the scheme will generate a gross social value of £475,000 over 5 years by supporting people returning to work and will generate £150,000 worth of volunteering opportunities. The scheme also generates social value by creating healthy streets, promoting wellbeing and supporting healthy lifestyles.

9.4 The focus on vacant shops for the Recovery grant funding directly responds to business priorities relayed during consultation and engagement, including priority actions identified in the Bath Business Improvement District 5 year plan (2021-2026). The proposal is also supported by other key stakeholders such as Bath Spa University and local arts organisations who are already engaged in Phase 1 of this project.

10 CONSULTATION

10.1 The development of the project scope has been informed by consultation and engagement with the community, local traders and businesses, as well as property agents and landlords. The project team also meets regularly with Councillors to develop project scope and feedback on pilot activities.

10.2 The Kingsmead Square proposals have been subject to significant community consultation over a two-year period, this is proposed to continue as the detail of the scheme is drawn up.

10.3 Further engagement with key stakeholders including landlords, tenants and businesses as well as Bath BID, as well as other civic and community groups will also be undertaken as part of the vehicle access restriction proposals and to inform detailed design. Particularly for Milsom Street where consultation to date has focused on landlords and traders and further public engagement is planned for summer 2021.

10.4 Undertaking the original grant application, supporting work and pilot initiatives were agreed by the s151 officer, Chief Executive, Cabinet and Senior Management, and have been in line with Council strategies and priorities.

10.5 The report has been agreed by the s151 Officer and Monitoring Officer.

Contact person(s)	<i>Lynda Deane/Cleo Newcombe-Jones/Wendy Maden</i>
Background papers	<p><i>B&NES Core Strategy & Placemaking Plan</i></p> <p>https://beta.bathnes.gov.uk/local-planning-policy-and-guidance</p> <p><i>Public Realm and Movement Strategy</i></p> <p>https://www.bathnes.gov.uk/services/planning-and-building-control/major-projects/public-realm-and-movement/public-realm-movemen</p> <p><i>Bath Pattern Book</i></p> <p>https://www.bathnes.gov.uk/services/planning-and-building-</p>

[control/major-projects/public-realm-and-movement/preparatory-projects](https://www.bathnes.gov.uk/services/planning-and-building-control/major-projects/public-realm-and-movement/preparatory-projects)

Kingsmead Square consultation reports and proposals
<https://www.bathnes.gov.uk/services/planning-and-building-control/major-projects/public-realm-and-movement/kingsmead-square>

Please contact the report author if you need to access this report in an alternative format

1 love milsom street

THE REVIEW

Winter 2020

Page 321

THE CONTENT

the intro	pg 4
the concept	pg 9
the weekend	pg 16
the numbers	pg 22
the verdict	pg 29
the lessons	pg 36
the next steps	pg 38

the appendices



The intro

LOVE MILSOM STREET

Coinciding with International Car-Free Day and European Mobility Week, Milsom Street was closed to traffic over the weekend of the 21st and 22nd September 2019.

Titled 'Love Milsom Street' the event championed the existing businesses, retailers and restaurants of Milsom Street, Milsom Place and Green Street, who were given the opportunity to showcase themselves by spilling out of their premises and reclaiming the street. As a result Milsom Street was reimaged as a boulevard complete with street garden, alfresco dining and a pop up coffee shop.

This report celebrates the successes of the event, identifies areas for improvement and makes recommendations for further investment in 2020 and beyond.

MILSOM
STREET

MILSOM STREET

1. Nos. 1-6 Milsom Street

*Kiehls (No.1), Finisterre (No.2), Maythers (No.3),
Waterstone (No.4 to 5), The Kooples (No.6)*

**2. Jolly's, House of Fraser
Nos. 7-14 Milsom Street**

3. Nos. 15-23 Milsom Street

*Cafe Rouge (No.15), Vinegar Hill (No.16), Gap Kids (No.17-18),
Bravissimo (No.19), India Jane (No.20), Sofa Workshop (No.21),
Moss Bros. (No.22), Miller & Carter (No.23)*

4. Nos. 24-36 Milsom Street

*Loch Fyne (No.24), Abbott Lyon (No.25), OKA (Nos. 26-27),
Portman (No. 28), T.M. Lewin (No.29), vacant (No.30),
Paperchase (No.31), vacant (formally Santorro, No.32),
Duo Boots (No. 33), Reiss (No. 34), Gabucci (No.42)*

**5. Somersetshire House
Nos. 36-42 Milsom Street**

*HAY (No.36-37), Mulberry (formally Brissi, No.38)
The Ivy Bath Brasserie (No.39), Milsom Place (No. 41)
Vancant (No.42)*

6. Nos. 43-47 Milsom Street

*Hobbs (No.43), vacant (formally HSBC, No.44-45),
Ted Baker (No. 46), The Botanist (No. 46), Lloyds Bank (No. 47)*

7 Milsom Place

*Anemone, Bandook, Biggie Best, Chanii B Shoes, Cote
Brasserie, Le Vignoble, Phase Eight, Quadri, Studio XXVI,
Yves Delorme*

8 Green Street

*French Connection (No.3), vacant (Nos.4-5),
Amathus (Nos. 6) SP Green Jewellers (No. 7), British
Heart Foundation (No.8), The Card Collection (No. 8A)
Bartlett & Son (Nos. 10-11), The Old Green Tree (No. 12),
Minerva Arts (No. 13), vacant (No.14), Loake (No.15),
Ace Optics (No.16), Fashion Fabrics (No.17), Shuropody (No.18),
Maze (No.19), Foot Balance (No. 20)*

"I saw the prettiest hat you can imagine, in a shop window in Milsom Street just now — very like yours, only with coquelicot ribbons instead of green; I quite longed for it."

Isabella Thorpe, Northanger Abbey

Background

In November 2018 the West of England Combined Authority (WECA) awarded funding to Bath and North East Somerset (B&NES) as part of the Love Our High Streets campaign. The funding was split into three separate projects;

- Bath City Centre
- Local Centres
- Midsomer Norton

Bath City Centre

£155,000 in feasibility funding was secured for Bath City Centre to help strengthen Bath's central retail spine, improve movement, increase dwell time, and address the north/south imbalance that has occurred as a consequence of the significant investment in SouthGate and Brunel Square.

Through the delivery of temporary measures that reimagine the high street, the merits of different schemes such as pedestrianisation, markets and

installations will be tested. 'Love Milsom Street' was the first scheme delivered using the feasibility funding.

Why Milsom Street?

Milsom Street is one of Bath's most historic high streets and home to one of the oldest department stores in the UK. Despite this, the area has struggled over the last decade to maintain its competitive retail offering with the number of vacant units increasing and footfall decreasing.

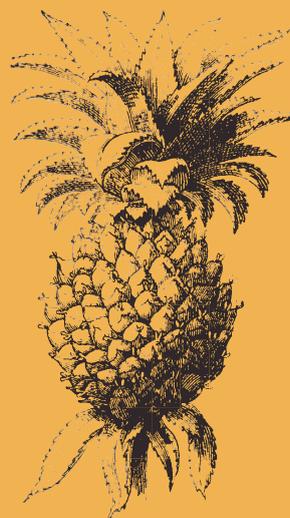
Bath's Christmas Market was expanded to include Milsom Street for the first time in 2018. The Market saw the closure of Milsom Street for an 18 day period, increasing levels of footfall and bringing about many benefits for the retailers and restaurants located in the area.

'Love Milsom Street' sought to test the principle of closing the street and animating the space outside of the Christmas period, in line with the ambitions previously set out in the Public Realm and Movement Strategy (2010).

— the concept

THEORY AND DEVELOPMENT

It's has been well established that the traditional British high street can no longer compete with contemporary shopping habits brought about by the rise of online shopping. Today, high streets must transform themselves into destinations that boast convivial urban spaces which offer experiences that cannot be replicated online.





IN THEORY ...

As highlighted in the introduction, Milsom Street used to be Bath's premier shopping destination. Distinctive to the rest of the high street, it was also the centre of civic celebrations, such as jubilees and coronations. Today the areas draw is less significant, as it struggles to compete against online shopping, rising business rates and the new development at SouthGate.

But what does SouthGate, and other successful public spaces have that Milsom Street is missing? One thing lacking is an animated, high quality public realm.

Convivial urban spaces

Convivial can be defined as having a welcoming, social and lively character. As defined by Illich (1973), convivial spaces are '*the essence of urbanity*' and enable people to be '*festive and social*'. Shaftoe (2008) explores this further

stating that without convivial spaces cities would be '*mere accretions of buildings with no deliberate opportunities for casual encounters and positive interactions between friends and strangers*'.

Animation

Animation can be described as the purposeful employment of festivities, programmed activities and pop-ups which transform and enliven public spaces by creating a stage for urban life (Glover, 2015).

Animation can also happen organically when people feel comfortable in spaces.

People attract people

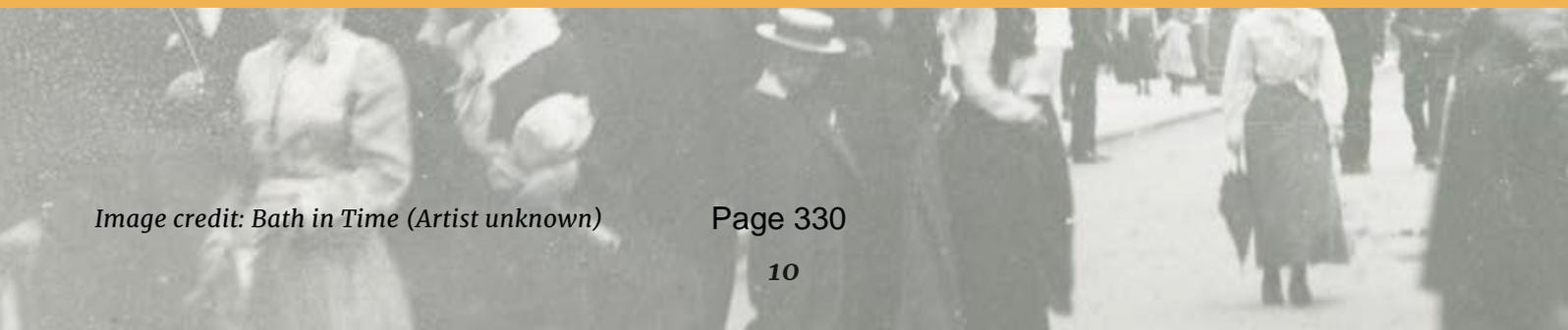
People go where people are. Social animals, we are constantly sending signals to each other and, without knowing it, informing each other's choices about the way we use and interpret our cities. An animated street

sends signals that are popular and as we see ourselves we are more. As William Leach says, people most people'.

However, as important to public spaces are not of crowds to sense that s. At the end of quantity.

High quality

A high quality an attractive peoples need (1992) place needs or s will be un-



is to passers-by that the area is
attractive. Naturally curious,
other people enjoying a space
are inclined to visit it ourselves.
H. Whyte puts it 'what attracts
it, it would appear, is other

As discussed by Gehl (2010), it is
to clarify that successful public
is not determined by the amount
that they attracts but by the
space is inviting and popular.
of the day its about quality over

Quality public realm

Quality public realm is not only
open space but one that meets
needs. As discussed by Carr et al
spaces that do not meet peoples
serve no important function
underused or unsuccessful. The

five core needs of people in public spaces
are comfort, relaxation, observation,
engagement and discovery.

Milsom Street is blessed with beautiful
architecture but without offering people
comfortable places to meet, sit, relax,
people watch and explore, its loses out to
other spaces in the city.

What does success look like?

The core aim of the event was to test the
pedestrianisation of Milsom Street outside
of the Christmas Market. Secondary to
that was the reimagination of the street in
to a space that meets the needs outlined
above. These aims were underlined
by a commitment to the retailers and
restaurants of Milsom Street, Milsom
Place and Green Street that the event would
serve them and would not attempt to bring
competing activities into the space.





CONCEPT DEVELOPMENT

The starting point

As discussed by Tibbalds in his 1992 paper 'Places matter most' the most successful places are grounded in their historical, geographical, physical and cultural context. Research was undertaken to gain a better understanding of Milsom Street and its context. This helped to inform the concept and the way the street was designed for the event.

Milsom Street ... a quick history

Milsom Street is named after Daniel Milsom, an 18th Century wine cooper (merchant). Milsom held two plots of land; Town Acre, the land north of George Street, and Milsom Gardens, on which Milsom Street was laid out in 1761.

Image credit: Bath in Time (Artist unknown)



DEVELOPMENT

Originally private townhouses, the transformation of the street into a shopping thoroughfare began towards the end of the Georgian era, continuing into the Victorian period.

The street is now home to over 30 different shops and restaurants including one of the oldest department stores in the world, Jolly's.

Beyond Milsom Street

After gaining an understanding of Milsom Street's context, a study of successful pedestrian areas in cities in the UK and around the world was conducted in order to review best practice and determine urban design principles that could be applied to the event.

Idea Development

Equipped with the theory, inspired by Milsom Street's history, informed by international best practices and with the project's aims in mind, the idea of a European style boulevard with a street garden was developed. This formed the centrepiece of the scheme from which the rest of the event was designed.

Determined to make the event work for the businesses, the idea of encouraging the local retailers and restaurants to adopt the highway was explored. This gained much support from the business community and each business was given the opportunity to spill-out in the road.



Building upon this, the concept of 'Love Milsom Street' was developed.

Aims

- Test the merits of pedestrianising Milsom Street outside of the Christmas Market by restricting vehicular movements
- Reimagine the streetscape as a new public realm that offers people an attractive and comfortable place to meet, sit, relax, people-watch and explore
- Encourage businesses to reclaim the street as their own and animate the space
- Create an experience that encourages the public to rethink the way we use our high streets in the future.

Concept

The creation of a street garden and European style boulevard populated by local businesses expanding into the highway, buskers and street performers.







— the weekend

SEPTEMBER 21ST - 22ND



Love Milsom Street took place on the 21st and 22nd of September 2019. The road was closed throughout the weekend and 40 businesses from Milsom Street, Milsom Place and Green Street spilled out into the street.

Each day started with a soft opening at 9am with businesses and activities setting up by 10:30am.

Cafe Rouge led the way, taking full advantage of the space in front of the restaurant. One of the most successful ventures of the weekend, by midday on Saturday the outdoor seating area was full and continued to be long into the evening.

Additionally HAY, teaming up with Dutchboy Waffles, created a popup coffee shop in front of the store. This formed a key anchor in the street scene and created a bookend to the street garden.

From the coffee shop the street garden extended north up Milsom Street. Grass sofas, deck chairs and flower boxes populated the space. A temporary busking pitch was set up outside No. 30, a vacant unit in the middle of Milsom Street, which the local busking community was invited to use for the weekend to help enhance the atmosphere.

The pitch proved successful and with music, refreshments and somewhere comfortable to

sit the street garden became a popular place for passers-by to stop and enjoy the late September sunshine.

Bookending the street garden at the north 'Patina and Co', an off-grid craft beer company, and 'Scout and Sage', an awarding micro distillery joined the event. The intention was not to invite any outside organisations to the event, however due to unforeseen circumstances one the businesses of Milsom Street had to pull out. To fill the void an invitation was put out to local businesses that did not already have existing premises in Bath City Centre.

Playing with the car-free element of the weekend, both 'Patina and Co' and 'Scout and Sage' bought their vehicles, re-purposed as bars, to the event. Additionally, The Botanist bought their travelling gin bar, which was situated outside their premises at the southern end of Milsom Street.

To provide entertainment for children, Bee Painted, Bath Children's Literature Festival and Super Pirates joined the event. Making the most of the street closure, Super Pirates used the highway for activities such as hopscotch, story telling and chalk drawings. It didn't take long for the grown ups join in and groups of people were decorating the street in chalk.

The central section of the street was given over to the businesses in Milsom Place. Chanii B, Le Vignoble and Bandoek all made appearances on the street. Quadri and Yves Delmore also participated with in-store promotions.



*"Experiments like this are always
useful and informative"*

Nick Tobin, Vice-Chairman of FOBRA





The promotions didn't stop there, throughout Milsom Street and Green Street stores and restaurants celebrated with discounts and in-store activities. Ted Baker hosted a jazz band, the Kooples poured champagne, Vinegar Hill had a prize draw, and Kiehl's offered discounts and free testers with their Wheel of Kiehl's.

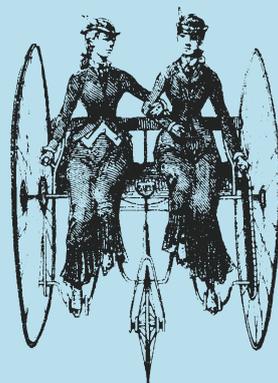
OKA, Santorro, Portman all spilled out on to the street and both Loch Fyne, and Miller & Carter had weekend deals on food and drink.

In Green Street the party continued, with French Connection, Amathus, SP Green

Jewellers and Loake all hosting various activities. The Old Green Tree hosted a BBQ and outdoor bar and Belhushi arranged live music and a mini competitions.

In addition to this many businesses helped promote the event by contributing gifts to Visit Bath's influencer weekend.

The final element of the event was the #LOVEBATH letters which were positioned at the bottom of Milsom Street. Throughout the weekend it was one of the most photographed spots in Bath and helped raised the profile of the event, Milsom Street and the Love Our High Street campaign.



440

businesses participated in the event

440

— the numbers

STATISTICS AND TRENDS

During the event data on the flow of people, consumer spend, air pollution and much more was obtained in order to compare the weekend against daily, weekly, monthly and annual trends.

Given this was the pilot event, no quantifiable targets were set however analysis of the data helps to identify what the successful elements of the event were as well as highlighting areas of improvement.

ent

9000

*pedestrian movements on Milsom Street
the during weekend*

0

*the number of times pollution
on George Street exceeded
unacceptable levels*

1

*incident of anti social
behaviour reported*

*delivered
with the support of*

3

partner organisations

Visit Bath, Bath BID and Milsom Place

weeks of planning

10

12.4mm

*of rainfall recorded during the
weekend*

highest temperature recorded

24^o

*5° above the average for
the time of year*

a peak hour flow rate of

2,984

pedestrians

17% higher than the average for September
between 2017 and 2019

overall spend of

£13,000

funded through WECA Love Our High Street programme

over

50,000

interactions on social media platforms

during the event weekend



ANALYSIS

Business Participation

40 businesses from Milsom Street, Milsom Place and Green Street participated in the event. This accounts for businesses that adopted the highway and/or ran promotions to support the event. This represented a 86% participation rate. Business models or head office protocols were the main reasons given by non-participating businesses, however many were very supportive of the event.

Consumer spend

Bath BID's Smart City Data initiative collates data and profiles spending habits across the city centre. Still in its infancy, there is currently no comparable data available for the event weekend.

Pedestrian movement

Pedestrian flows were derived from BID footfall counters positioned outside Nos. 7-8 and Nos.27-28 on Milsom Street. Footfall peaked between 3pm and 4pm

on the Saturday at 2984 people per hour. This represents an increase 17% when compared to the average peak hour flow for other Saturdays in September*.

The flow of pedestrians was lower on the Sunday, peaking at 2015 people per hour however when compared to other Sundays in September* this represented a 35% increase.

An additional footfall counter is located on Burton Street however, as there can be no guarantee that pedestrians passing this point visited Milsom Street during the event weekend, this data has been excluded from the analysis.

Traffic and air quality

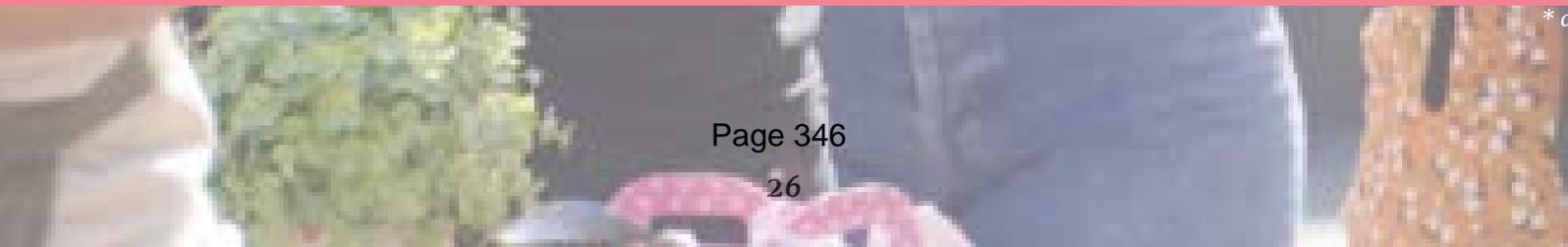
The event coincided with the start of the Universities' academic year. It was anticipated that the volume of traffic would be higher than usual. As part of the traffic management scheme, signage was put up a week before the event to

inform local weekend, the were utilised.

In order to an impact monitoring increase le weekend, NO considered k in Particle Street at m and 22nd S no activities when the sp considered t of the data considered to

Weather

An important to monitor pedestrian interventions, minimum.



traffic and, during the event
the city's matrix (VMS) signs

to assess whether the event had
an impact on air quality, data from the
monitoring stations was obtained. Despite
the increase in traffic during the
event, CO2 levels across the city were
generally to be at acceptable levels. Spikes
in traffic occurred on George
Street at midnight on the 21 September
and 22 September. Given that no events
were taking place on Milsom Street
at the time, the spikes occurred the event is not
likely to be catalyst. On review of all
data for September these spikes are
likely to be anomalies.

Another aspect of the event was
the impact weather had on
traffic movement. Wet weather
conditions were therefore kept to a

The data set included all weekends in September between 2017 and 2019

A weekend of two parts. On the Saturday the event was blessed with clear skies and higher than average temperatures. The Sunday was wet and changeable, however footfall was still higher than average. During the event weekend there was considered to be no correlation between pedestrian flows and poor weather conditions.

Planning

The planning of the event was undertaken in collaboration with Visit Bath. Planning for the event started in the middle of July, taking 10 weeks.

Finance

The overall costs of the project at the time of writing was £13,000*. This does not include Officer time and the in-kind support provided by Visit Bath, Bath BID and Milsom Place. The in-kind support consisted of planning and logistics, marketing and storage.

Marketing, social media and press

To support the event a marketing and social media campaign was created. This ran alongside B&NES and WECA official press releases.

Much consideration was given to how vigorous the campaign needed to be. Ultimately it was decided that the pedestrianisation of the street needed to be tested without being unduly influenced by marketing. The marketing therefore

focused on celebrating the street and discussed the concept being tested rather than attempting to persuade people to attend the event.

The event gained the attention of the press featuring in local newspapers before and after the weekend. It was also covered on BBC Radio Bristol on the Saturday morning and on Point West on Sunday.

In order to reach a bigger audience, the project team also took over Visit Bath's social media platforms during the event. Across social media channels (Facebook, Twitter and Instagram) the event received over 50,000 interactions, of which the vast majority were positive.

Summary

There are many positive statistics and trends that can be interpreted from the data, in particular business participation and pedestrian flows.

Some elements, such the Universities' Fresher week and the weather, were outside of the project team's control however the impacts can be mitigated through planning in the future.

There are some gaps in the data, such consumer spend, and there is a recognition that more sophisticated techniques could be used to capture data such as footfall, pedestrian flow and air quality in the immediate area.

** to the nearest 000's*

— the verdict

THOUGHTS AND FEEDBACK

As discussed earlier on this report, whilst statistics are important the feeling and atmosphere created by a space is also crucial to determining its success.

In order to gain an understanding of the how the local communities felt about the event, businesses, residents and visitors were invited to fill out a survey.

The survey was broken down into three different sections with an opportunity to provide further comments.

- Pre-event
- Event weekend
- Post-event/Future

Copies of the surveys are provided in the appendices.



*of the businesses located on
Milsom Street, Milsom Place and
Green Street ...*

94%

felt that event met or exceeded their
expectations

52%

felt that the increase footfall had a
positive effect on sales

96%

said that would support more road
closures and events on Milsom Street





CAFE ROUGE

PETIT DÉJEUNER
DÉJEUNER
DINER

OPEN ALL DAY

VINEGAR HILL

PETIT DÉJEUNER
DÉJEUNER

"the pocket park and outside dining were great" Resident/Visitor

"On the Saturday we saw a significant improvement to our sales. I would like to see more car free weekends"

Manager at India Jane (No. 20 Milsom Street)

"...the atmosphere was what made it great"

Manager at French Connection (No. 3 Green Street)

"We've received many positive comments from local businesses and residents in support of ongoing closures... in the future."

Cllr Joanna Wright, Cabinet Member for Transport

"The atmosphere was fantastic but I was a bit disappointed at the lack of wheelchair access." Resident/Visitor

*"It was nice to see something
different on the street"*

Ass. Manager at Moss Bros. (No 22 Milsom Street)

*[I enjoyed] the relaxed atmosphere, no
traffic, it felt like an open community
event*

Resident/Visitor

*"Reintroduced some 'life'
back into Milsom Street"*

Nickie Portman (No. 28 nd 32 Milsom Street)

*"We did really well on Saturday ... we were up 20% from
other weekends. I would not support making it car-free
permanently ... but having these weekends every now and
again is a good idea, maybe once a month"*

Manager at Maythers (No. 3 Milsom Street)

*"it created a great atmosphere
on Milsom Street"*

Manager at Jolly's, House of Fraser (7-14 Milsom Street)





Press and social media

The event was covered by local newspapers and community forums. It also featured on BBC Radio Bristol and BBC Points West.

Visit Bath social media platforms were utilised and an influencer meet was held which helped raise the profile of the event. By the end of the weekend, Milsom Street had become one of most photographed areas of the city across local social media channels.

Perceptions

On the whole feedback was positive. When comparing the feedback to the quantitative data it is interesting to learn that there is a disconnect between businesses perception and the reality on the ground, particularly when it comes to footfall.

It is also evident that there is a still view held that the bus stop, parking and live traffic helps increase trade. Both academic literature and case studies across the UK and the rest of the World, however, refute this claim.

Consensus or dissensus?

It is evident from the feedback, from all sources, that there is an agreement that investment in Milsom Street and the north of the city is required in order to revitalise the area. Of what form that should take, there is less agreement.

When asked if Milsom Street should be closed in the future, the overwhelming response from the survey was yes. When asked how often, the response ranged from a permanent closure, to weekends only or monthly. This uncertainty is echoed by other businesses, residents, visitors and community groups who have different needs and ambitions for the area.

There is also a resistance from local residents and workers who depend on the park and ride, as well as a concern about the lost of blue badge and resident parking bays.

— the lessons

SWOT ANALYSIS

ties

ong support from businesses,
ad Councillors for further
Milsom Street during 2020
There are opportunities
rent concepts and deliver a
of activities throughout the

ne of activities allows for
to be create and a streamlined
to be adopted. It also provides
ortunities for data to be
ata will be used to inform the
lans for Milsom Street.

hreats include availability
s, competing needs and
f different organisations,
le provision, parking
ccessibility and planned
rks in Queen Square.

needs to be undertaken
sinesses that there is no
suggest that parking and
ts in higher consumer spend.



— the next steps

RECOMMENDATIONS

Short Term

Having analysed the data and reviewed the feedback there are some key short term recommendations that can be delivered as part of a plan of works for 2020/21. These include;

- Review of project aims
- UK and international case studies
- Best practice research relating to mobility and accessibility
- Review of placemaking tools

These short term goals will be incorporated into the preparation of a Full Business Case for investment into Milsom Streets public space including street furniture and associated works and a future programme of events and animation activities.



Long Term

The long term aspiration for Milsom Street is to support the transition of the area from retail core towards a mixed use urban quarter with an emphasis on leisure and culture, together with active ground floors and a greater mix of residential and non-retail uses on upper floors. A Milsom Quarter Masterplan exercise is planned for 2021, which will help set the future direction of the area.

Plan of Work 2020/21

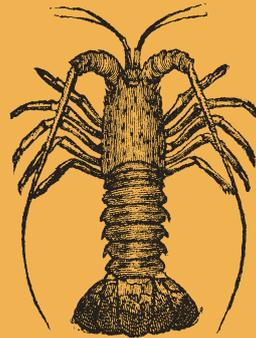
Spring - Winter 2020

- Short term pilot interventions to support existing businesses and help reanimate the street
- Collect data to inform Full Business Case
- Consultation and engagement focused on engagement with landlords, property agents and traders.

Spring - Summer 2021

- Prepare and submit Full Business Case to WECA
- WECA Committee to consider Full Business Case and make a decision on funding award





Bath & North East
Somerset Council

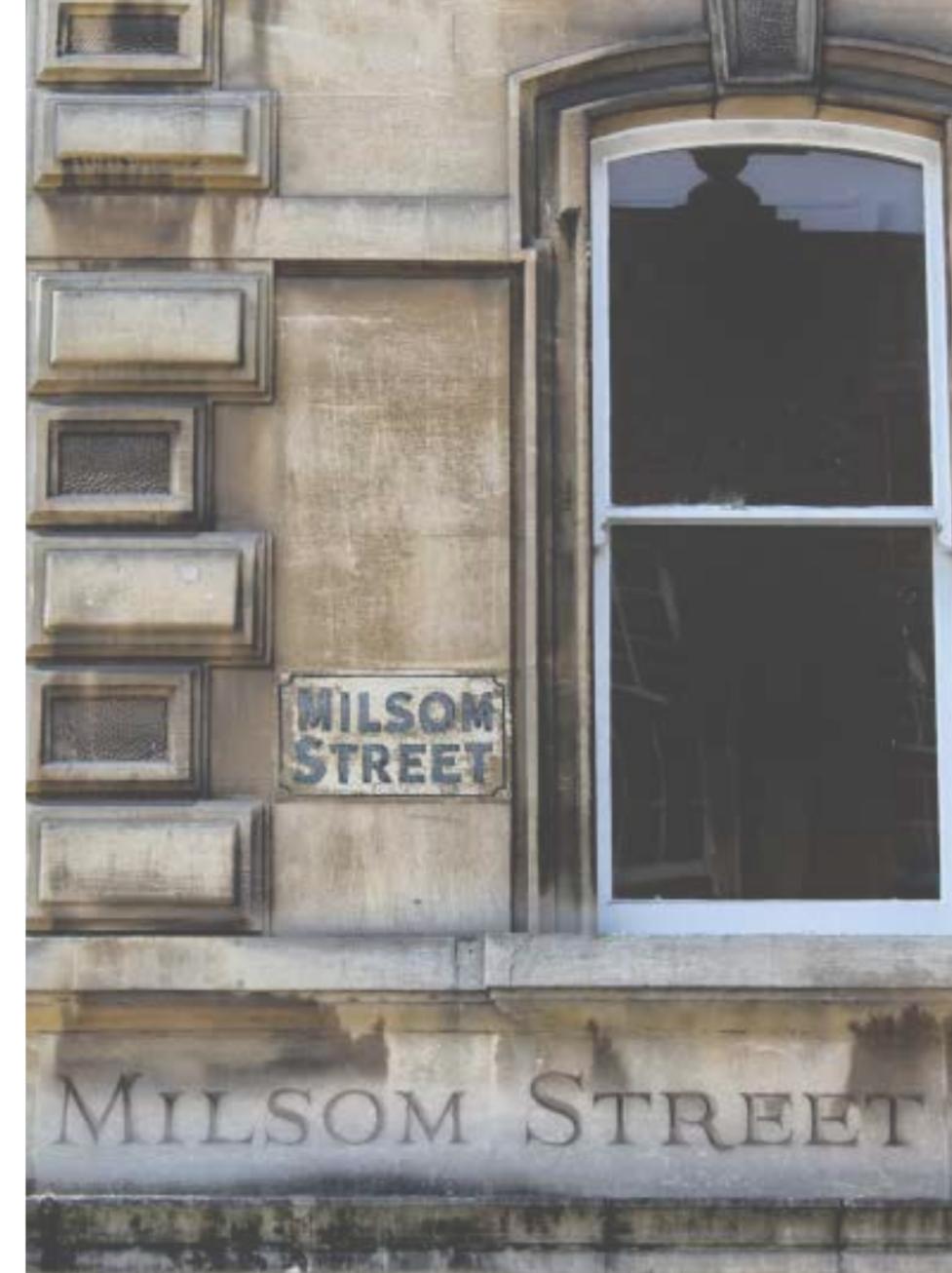
Improving People's Lives



High Street Renewal Programme for the Milsom Quarter

Page 361
Scheme Proposal

July 2021



Bath & North East
Somerset Council

Improving People's Lives

Contents

This Love our High Streets Scheme Proposal summarises the scope of the interventions sought through the WECA Full Business Case Feb 2021. It sits alongside this document, and other background evidence, and forms part of B&NES Council's High Street Renewal Programme.

This Scheme Proposal includes:

1	The Proposal	2
2	Proposed Project Scope	3
3	Types of Interventions	4
4	Strategic Context	5
5	Pilot Activities	6
6	Project 1: Milsom Street	10
7	Project 2: Kingsmead Square	18
8	Project 3: Outdoor Trading Strategy	22
9	FBC Logic Model	23
10	Project Budget	24
11	Project Plan	25

Page 362



Community Engagement, Kingsmead Square 2018

The Proposal

A £1,235,000 funding package to support Bath High Street Renewal has been earmarked from the West of England Investment Fund's 'Love our High Street' programme, subject to Full Business Case. The initial proposal put forward by B&NES Council, which successfully ringfenced this funding, was for a project focused on the northern part of Bath City centre, combining targeted public realm interventions with support for events, animation and culture on the streets and in public spaces.

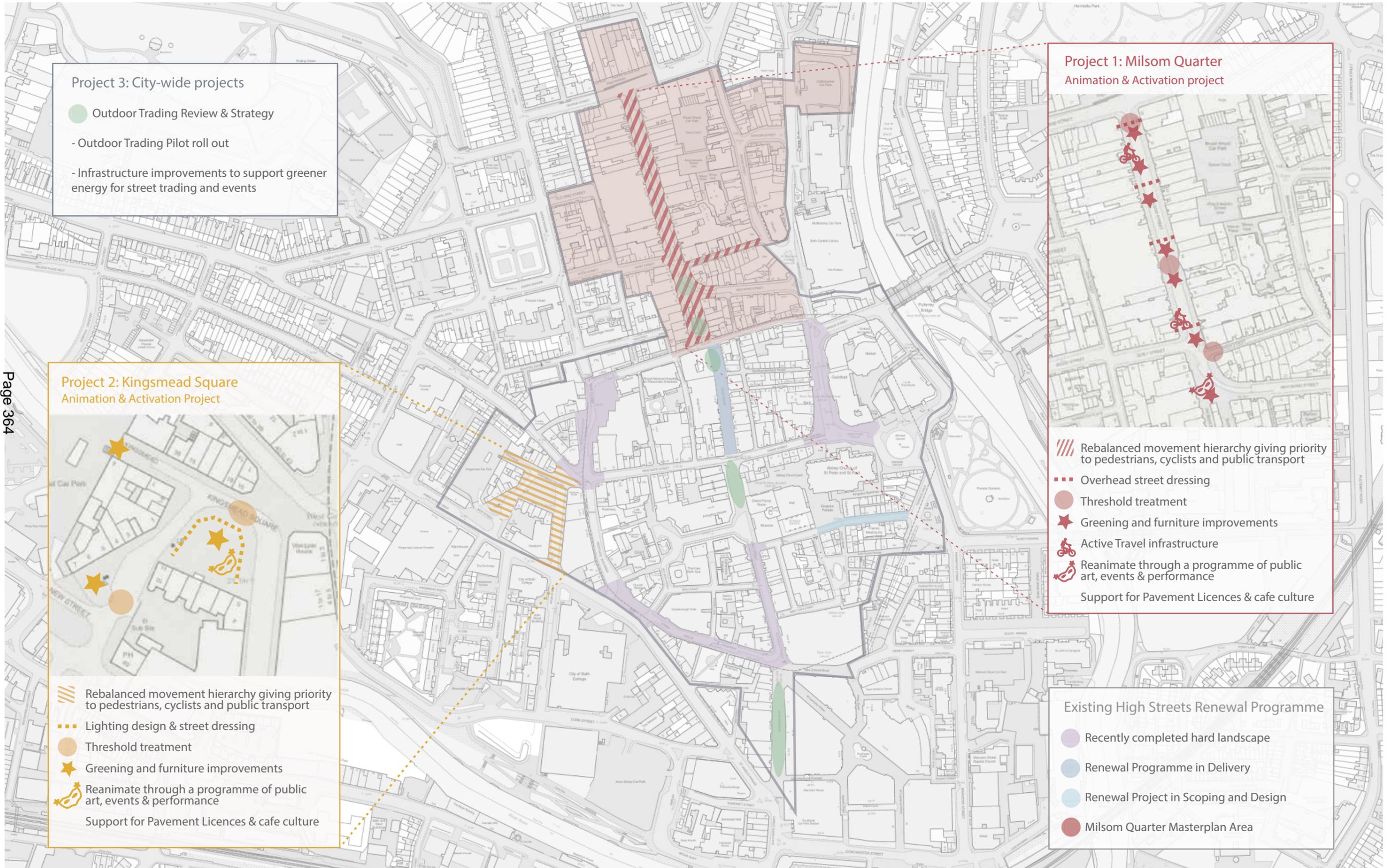
Following the delivery of various pilot projects, this Full Business Case has been prepared to support the delivery of three key projects:

- **Project 1: Milsom Quarter Animation and Activation Project**
- **Project 2: Kingsmead Square Animation and Activation Project**
- **Project 3: City centre wide projects** to support an outdoor trading strategy and supporting electrical infrastructure

Officer resource for project management, design, delivery, monitor and engage with stakeholders and set-up and run the events programme is also included within scope.

The project supports the Council's Liveable Neighbourhoods agenda and seeks to respond to the Climate and Ecological emergencies and the transition towards less car-dominated and more accessible, people-friendly High Streets.

Proposed Project Scope



Project 3: City-wide projects

- Outdoor Trading Review & Strategy
- Outdoor Trading Pilot roll out
- Infrastructure improvements to support greener energy for street trading and events

Project 2: Kingsmead Square Animation & Activation Project



- Rebalanced movement hierarchy giving priority to pedestrians, cyclists and public transport
- Lighting design & street dressing
- Threshold treatment
- Greening and furniture improvements
- Reanimate through a programme of public art, events & performance
- Support for Pavement Licences & cafe culture

Project 1: Milsom Quarter Animation & Activation project



- Rebalanced movement hierarchy giving priority to pedestrians, cyclists and public transport
- Overhead street dressing
- Threshold treatment
- Greening and furniture improvements
- Active Travel infrastructure
- Reanimate through a programme of public art, events & performance
- Support for Pavement Licences & cafe culture

Existing High Streets Renewal Programme

- Recently completed hard landscape
- Renewal Programme in Delivery
- Renewal Project in Scoping and Design
- Milsom Quarter Masterplan Area

Types of interventions



Parklets



Cycle racks



Street furniture



Threshold treatment



Street dressing



Events



Food & beverage pitch



Arts & performance



Planting & greening



Street Trading Strategy



Heritage repairs



Events infrastructure

The project will support the Council's Liveable Neighbourhoods agenda and seek to respond to the Climate and Ecological emergencies and the transition towards less car dominated and accessible, people friendly High Streets.

In terms of the emerging One Shared Vision, the proposals respond strongly to three of the emerging themes:



15 minute neighbourhood

The aspiration is that day-to-day activities such as going to work, food shopping, healthcare, leisure activities and going to school are all possible within 15 minutes of where we live. Creating better air quality, reduced congestion, and birds are not drowned out by traffic noise.

The focus of the project is to support local shopping areas to thrive, with diverse shopping, eating and working opportunities. The access restrictions create pedestrianised environments where walking to different services is comfortable and enjoyable.

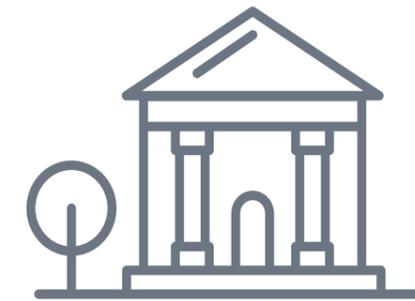
The street furniture and environmental improvements will enhance the experience for visitors and residents and the free to access events, performance and arts activities will give people a reason to come back to these high Streets.



Climate Emergency

The focus of the project is to support the vibrancy and vitality of the High Street which will support 'buy local' agendas, elements of the project support outdoor events, outdoor trading and markets, which will attract local residents. The projects are also underpinned by improving the environment for pedestrians, cyclists and users of public transport and prioritise these modes. Improvements to electricity infrastructure will also help to minimise the use of polluting generators by street vendors and during events.

Procurement of street furniture and restoration works to buildings will prioritise natural materials and sustainable sourcing. The project scope also includes greening and planting which can help reduce urban heat island impacts and improve biodiversity.



Heritage of the Future

The proposal will support the move to Heritage of the Future as the interventions will support areas in transition where there have been higher vacancy rates.

Street dressing and public realm improvements will be designed to celebrate the historic environment and the distinct quality that gives the city.

Historically-sensitive public realm repairs will restore pennant slabs and setts in key locations in line with the Pattern Book.

Pilot Activities: Love Milsom Street Event 2019

Milsom Street itself is a key public space in the city historically hosting Jubilee celebrations, celebrations at the end of the WWII and other historical events.

The capacity of the street given its width and sections of wide pavement create a unique space in size and scale in the city centre for events and spectacles. In 2018, the Bath Christmas market footprint extended to include Milsom Street; in 2019 a car-free weekend celebration was held here. In 2020, an access restriction and bus gate was implemented prohibiting access by motor vehicles between 10am-6pm.

The Love Milsom Street Event was supported by the WECA Love our High Streets pilot funding, and it is proposed to build on the success of this event with a 5 year events, performance and arts programme.

Page 367

40 businesses participated in the event

40,900 pedestrian movements on Milsom Street during the weekend

peak flow rate of **2,984** pedestrians

£13,000 overall spend

delivered with the support of **3** partner organisations

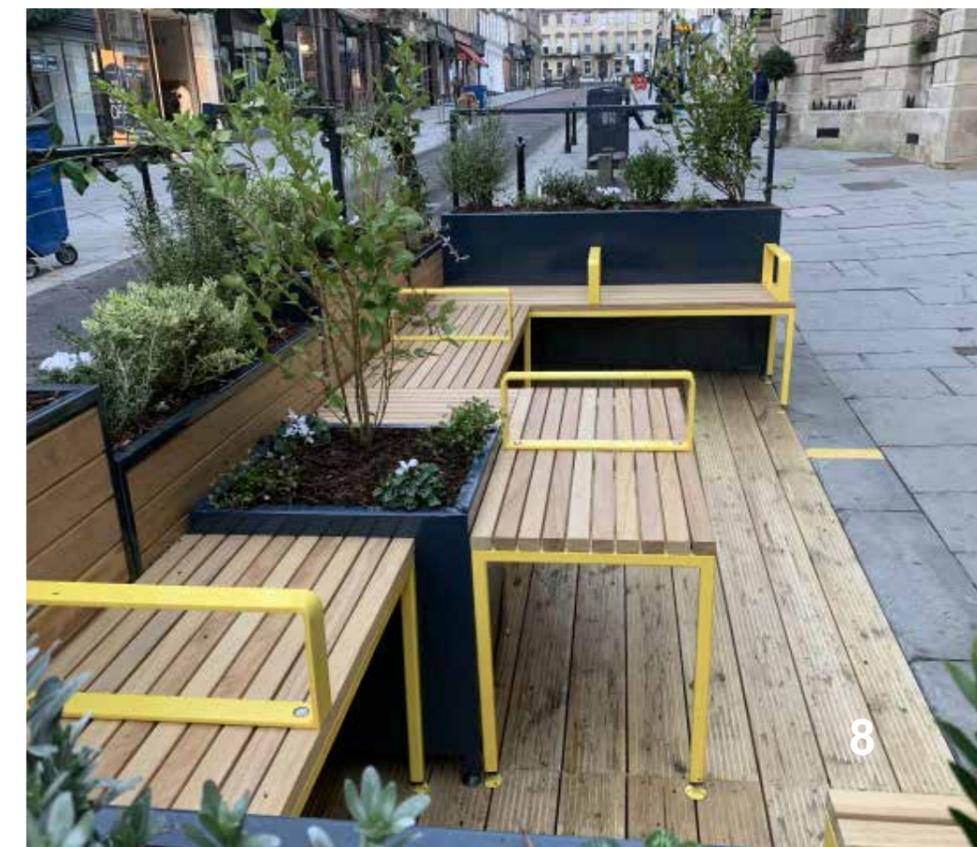
over **50,000** interactions on social media platforms



Vacant Units Action Projects 2020-2022



Pilot Activities: Parklets Pilot 2020



Pilot Activities: Union Street Animation & Outdoor Trading Pilots 2019



Proposed Projects

For the purposes of the Full Business Case indicative design proposals have been prepared and costed however detailed design and layout will be subject to further consultation and engagement.

Project 1: Milsom Quarter



Project 1: Milsom Quarter - North



Page 373



1 Threshold treatment



2 Permanent planters



3 Cycle storage



5 Street dressing



4 Parklets



Programme of interventions in vacant properties

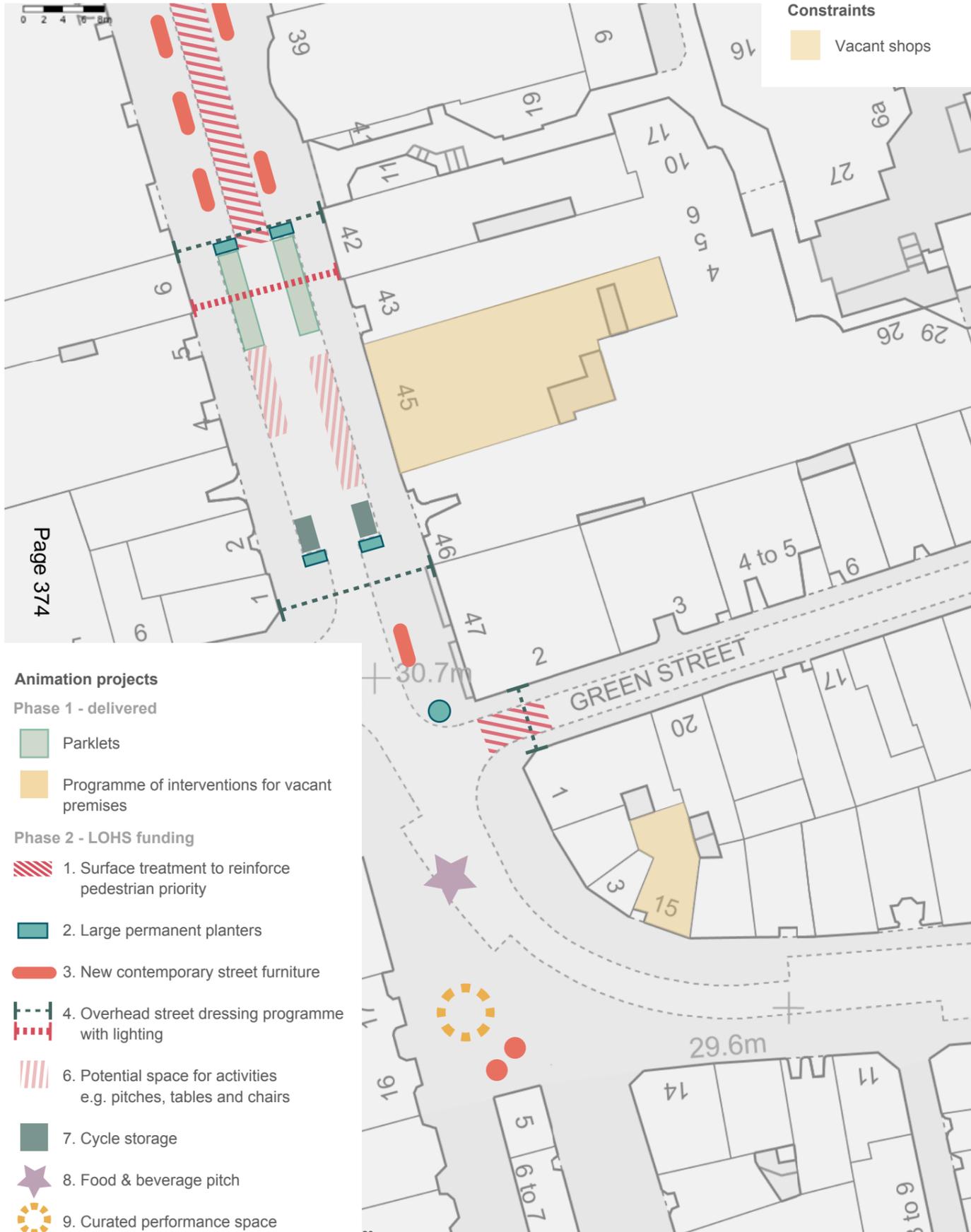


Pavement Licences for tables & chairs



6 New contemporary street furniture

Project 1: Milsom Quarter - South



Parklets



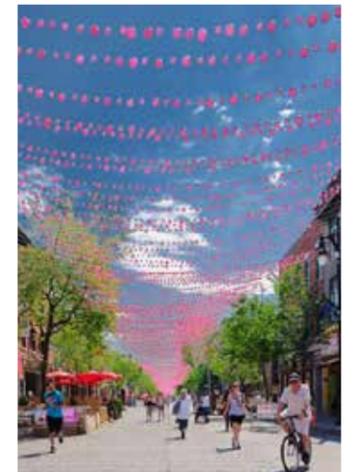
1 Threshold treatment



2 Permanent planters



3 New contemporary street furniture



4 Street dressing



8 Food & beverage pitch

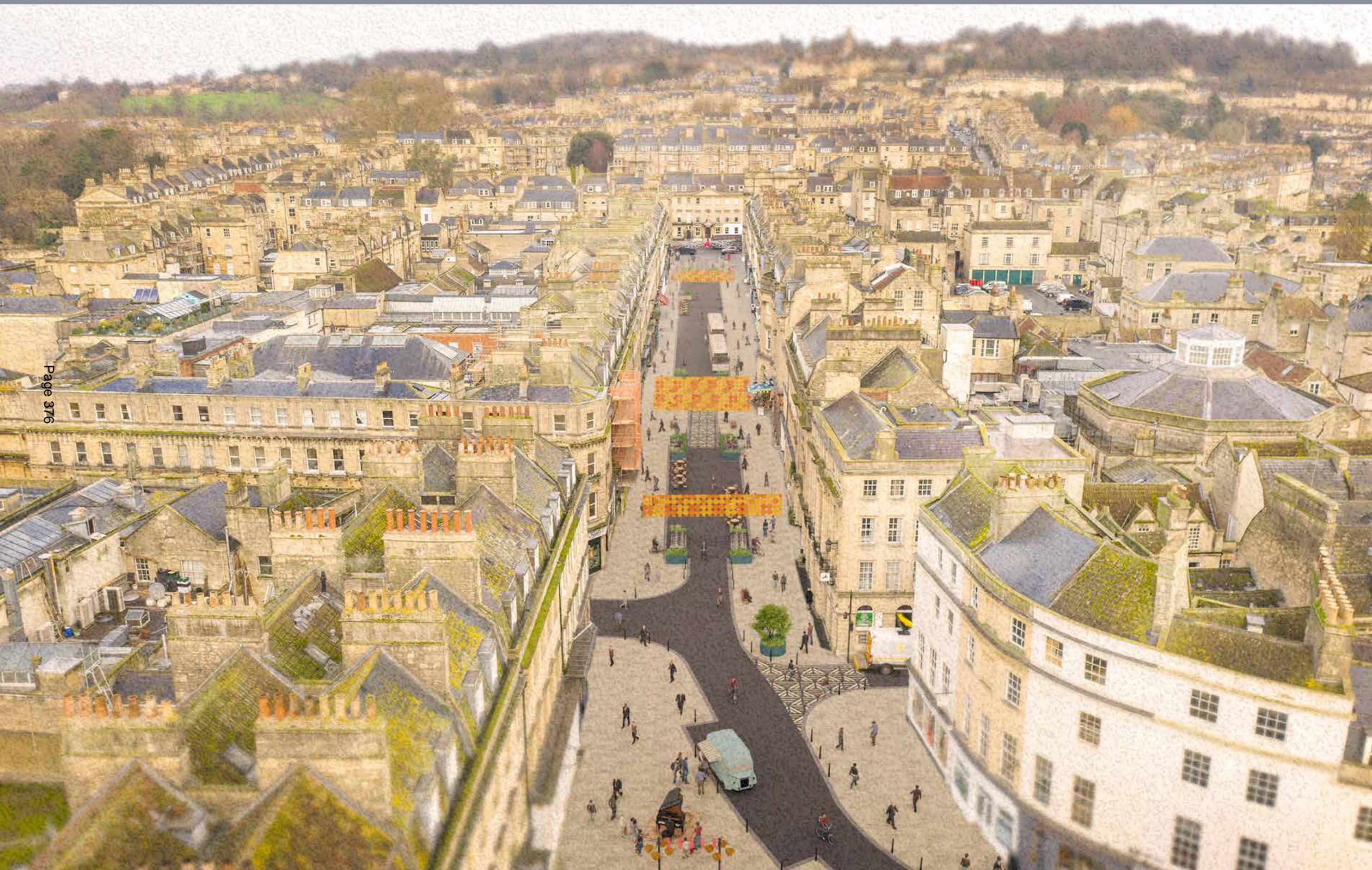


9 Curated performance space

Milsom Quarter Existing view



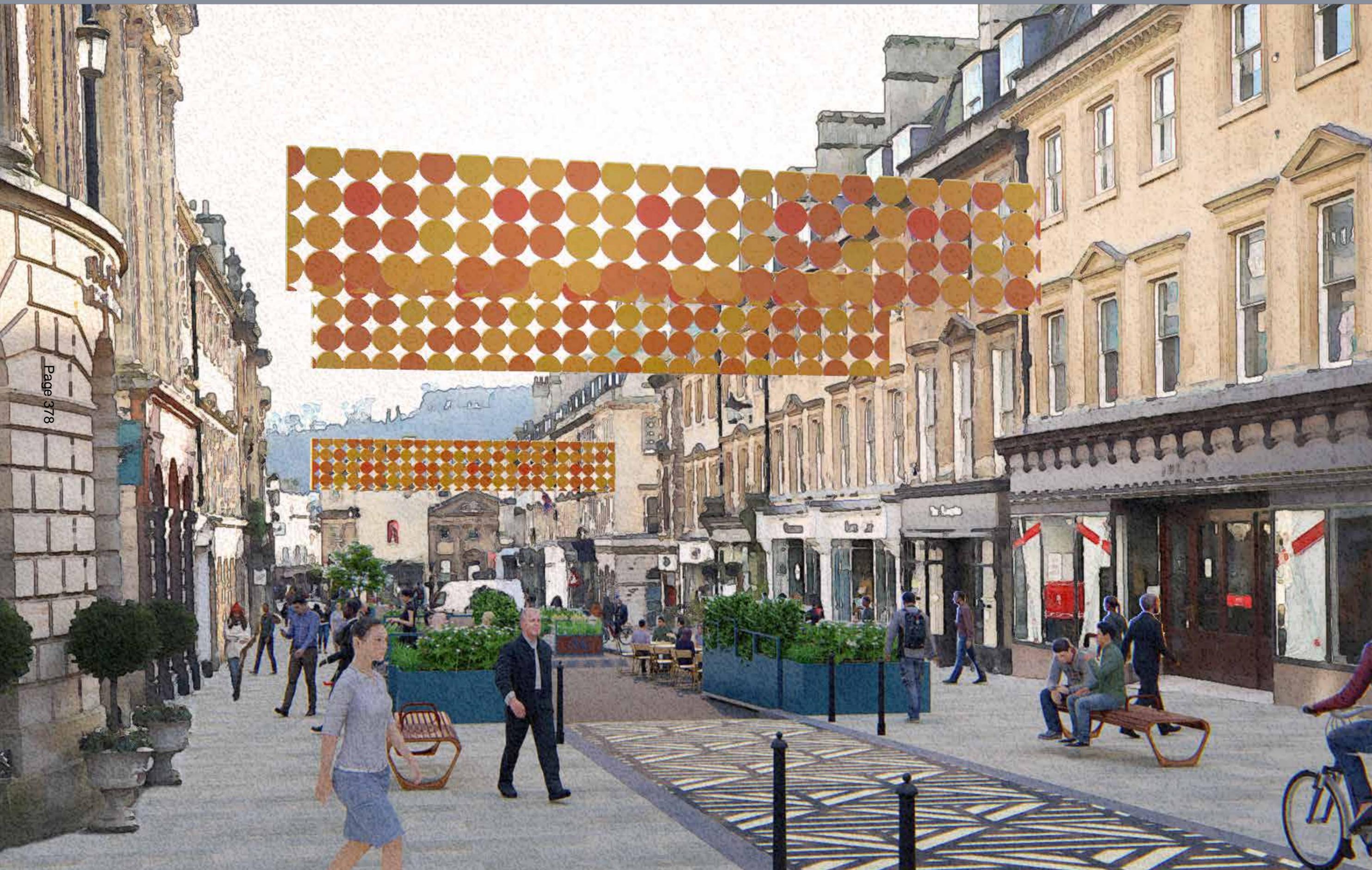
Indicative Scheme Aerial View



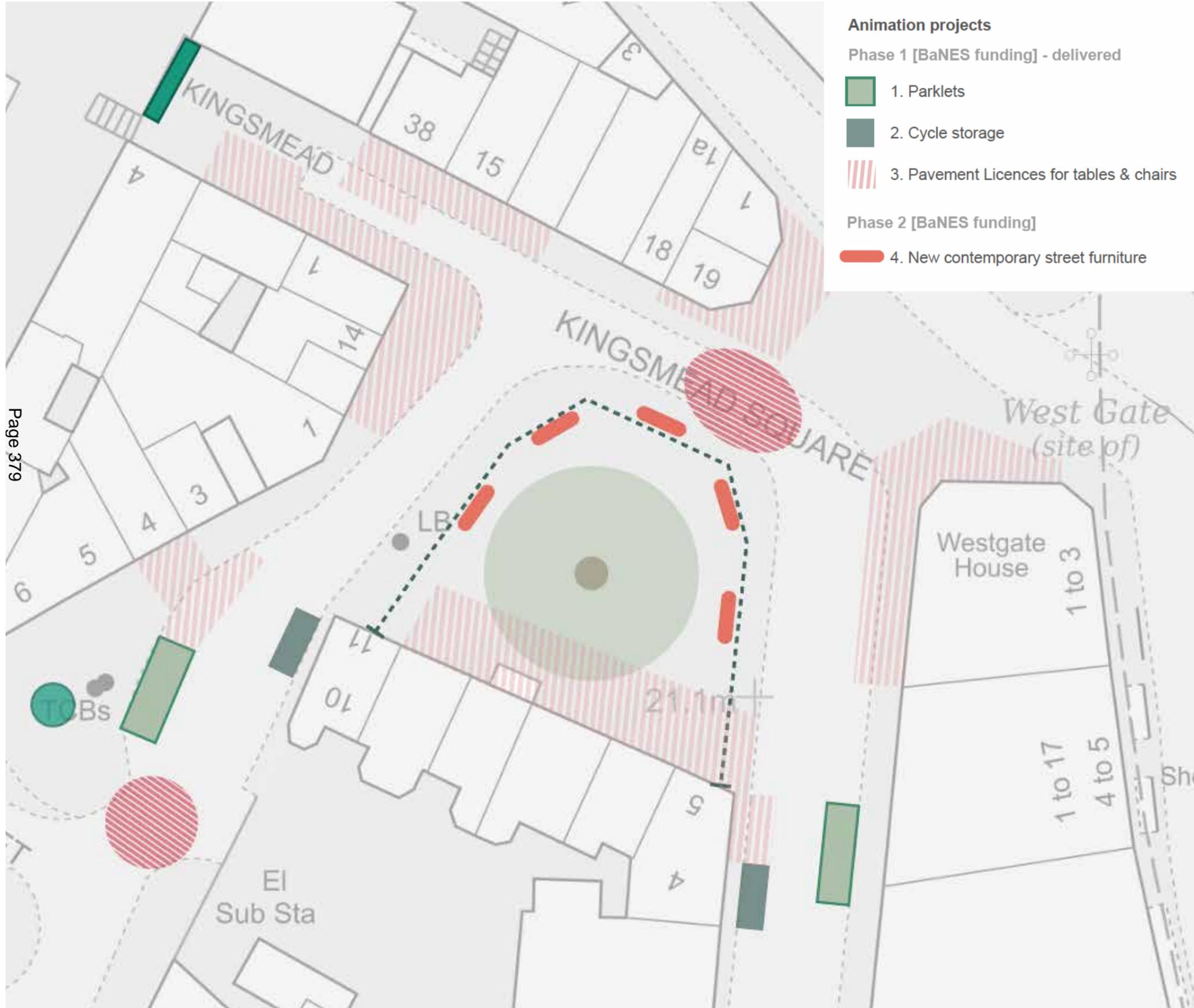
Indicative Scheme Perspective View



Indicative Scheme Perspective View



Project 2: Kingsmead Square



Page 379



5 Threshold treatment to reinforce pedestrian priority



6 Street lighting & dressing programme



7/8 Greening and feature furniture to celebrate green infrastructure



Kingsmead Square Existing view



Indicative Scheme Aerial View



Indicative Scheme Perspective View



Project 3: Bath City Centre Outdoor Trading Project

The Bath City Centre Outdoor Trading Project aims to deliver a holistic strategy for outdoor trading across the city, include identifying destinations for different types of goods, a refined public realm layout, attractive trading stalls and electricity infrastructure to avoid the use of polluting generators.

Outdoor trading across Bath is popular with shoppers and contributes to a unique high street offer which includes local traders and goods. However, in recent years trading pitches have grown sporadically through the city with no coherent plan. This project identifies the opportunity to develop an outdoor trading strategy to best complement the city and the experience of shopping and moving through it. The project also includes bespoke, branded stalls for traders which create street 'destinations' and an attractive retail offer.

The 2013 Power Behind Festivals Guide (Green Festivals Alliance) found that Diesel Fuelled Generators are highly polluting, with carbon emissions of 2.63 kg carbon per litre compared to mains electricity at 0.54 Kg carbon per kWh, so to address the Climate Emergency on street electricity infrastructure should be provided which can use renewable energy.

Project objectives

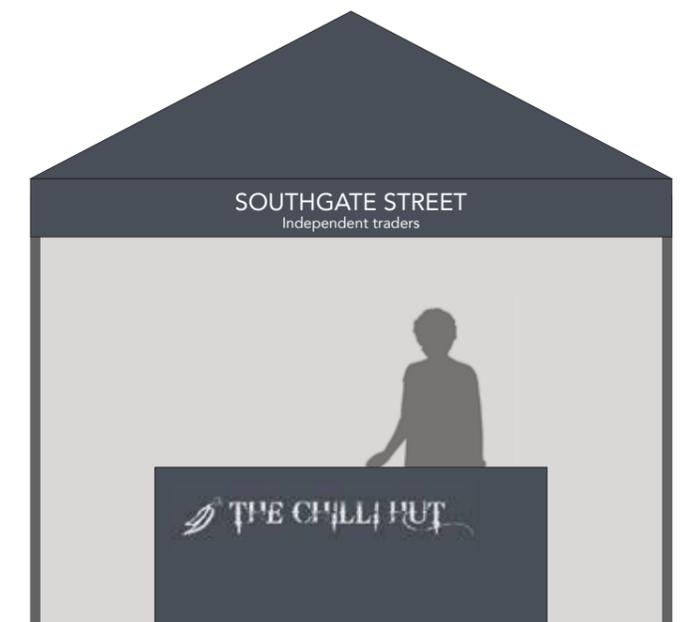
- The strategy and new stalls should celebrate the value of independent traders in diversifying the retail offer and animating the street
- The stalls could have an element of uniformity to make a cluster of stalls a 'destination', with scope for individuality to celebrate the uniqueness of independent traders. The design should consider the Pattern Book to ensure a positive impact on the city and support for the World Heritage status
- The project will create a more pleasant public realm and retail environment for shoppers with a diverse range of goods.
- The strategy will positively impact sight lines and pedestrian movement through the retail core.



Union Street Trading pitches have been subject to a successful pilot where street trading pitches have been reconfigured and stalls re-designed with a consistent uniform design to best support the streetscene.

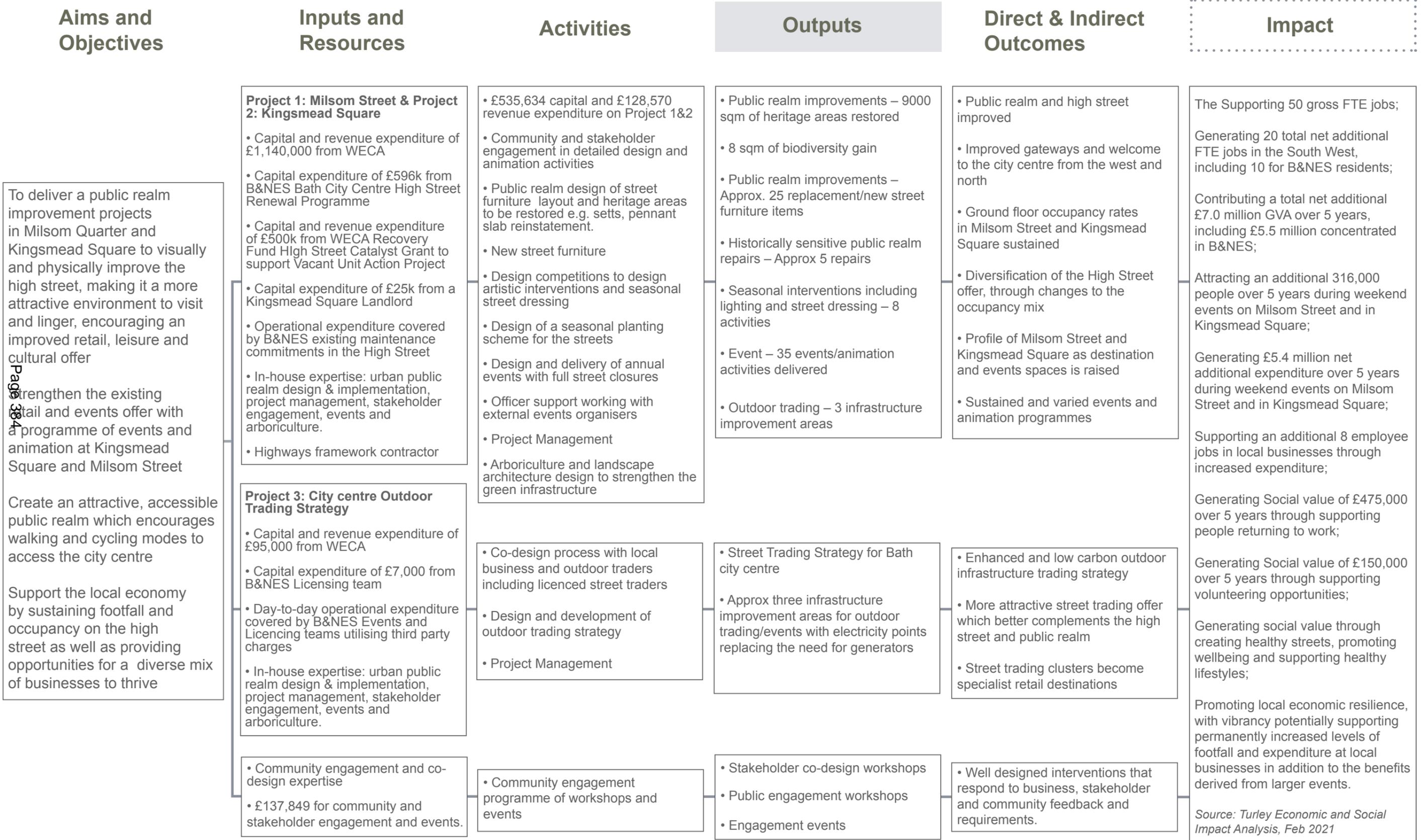


An example of a trading stall in the retail core



How the stalls could look

Full Business Case Logic Model



Page 384

Project budget

The total value of the High Street Renewal for Bath City Centre bid to WECA's Love Our High Streets programme is £1,235,000, to be delivered over a 5 year period.

Project Management Including design, delivery, monitoring and bidding for match funding.	£416,046
Project 1: Milsom Quarter Animation & Activation project	£553,419
Project 2: Kingsmead Square Animation & Activation project	£113,785
Project 3: City-wide projects Including street trading strategy, pilot roll out and improvements to events infrastructure	£90,000
Contingency	£61,750
TOTAL	£1,235,000

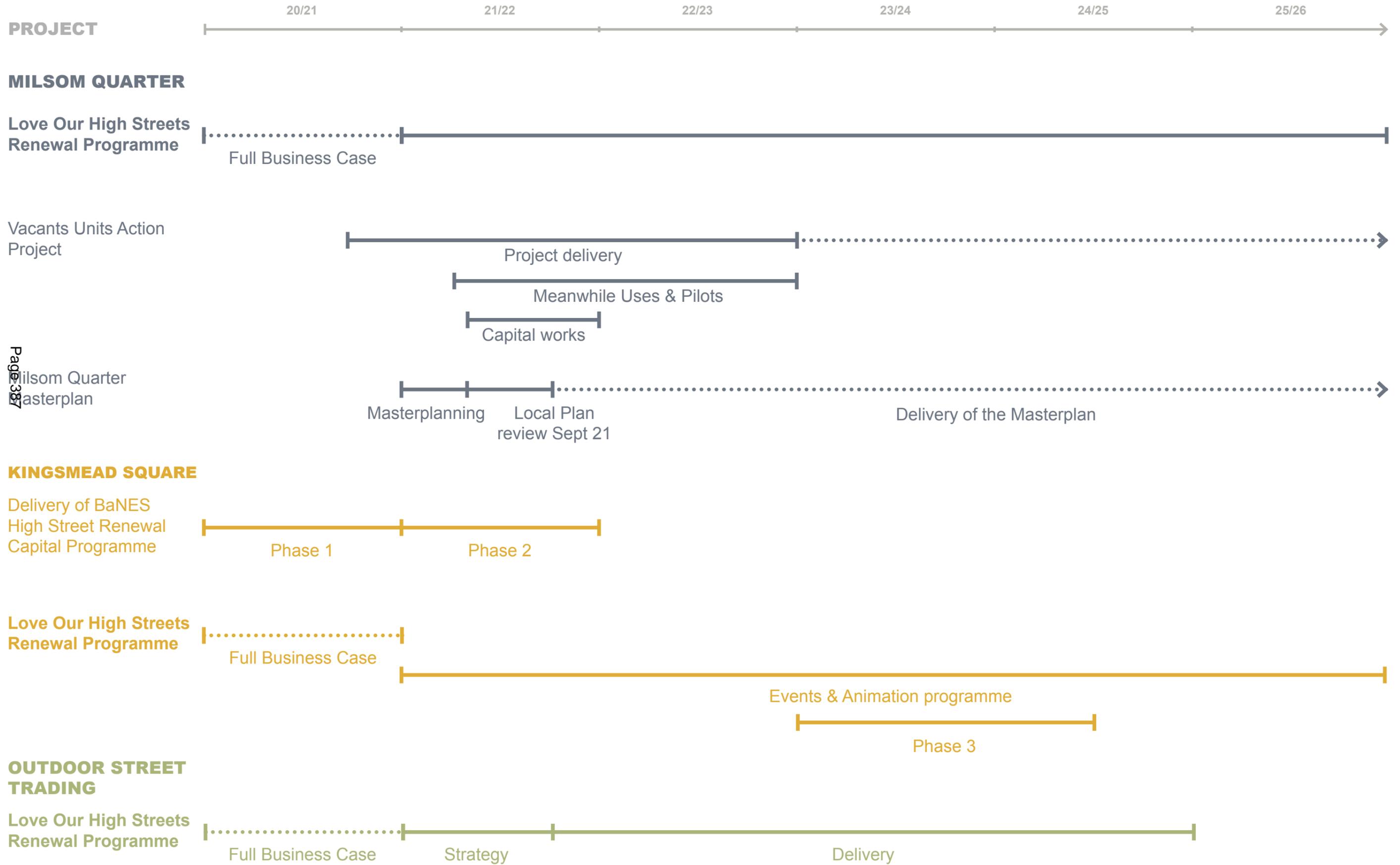
Milsom Quarter Masterplan

20 week programme, to include;

- Property, Design, Heritage, Movement, Sustainability
- **Engagement** with this group **July 21**
- Final output will include a **Spatial Framework and Delivery Plan**



Project Plan



Page 388

High Streets Reopening & Renewal

Economy & Growth

Bath & North East Somerset Council



Bath & North East
Somerset Council

Improving People's Lives

Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Cabinet	
MEETING/ DECISION DATE:	20 July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3281
TITLE:	On street parking - parking permits and charges	
WARD:	All	
AN OPEN PUBLIC ITEM		
<p>List of attachments to this report:</p> <p>Please list all the appendices here, clearly indicating any which are exempt and the reasons for exemption</p> <p>Appendix 1 – Parking Permit Consultation outcomes report</p> <p>Appendix 2 – On Street Parking Permit Terms & Conditions</p> <p>Appendix 3 – Summary of themes identified from first stage consultation</p> <p>Appendix 4 – Emissions based parking permits prices for residents parking zones</p> <p>Appendix 5 – Distribution of Hotel and Holiday Let/Guest House permits in Bath</p> <p>Appendix 6 – Analysis of permit/space demand by RPZ in Bath</p> <p>Appendix 7 – Updated Equalities Impact Assessments following first stage consultation</p> <p>Appendix 8 – RPZ Review - Parking Permit Proposals - Distributional Impact Assessment</p> <p>Appendix 9 – Distribution of vehicles impacted by higher permit charge across local deciles</p>		

1 THE ISSUE

- 1.1 A range of proposals affecting on street parking permits have been developed aimed to improve air quality 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. These proposals are also aimed 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.

2 RECOMMENDATION

The Cabinet is asked to:

- 2.1 Consider the feedback to the consultation on proposals for on street parking permits, including terms and conditions.
- 2.2 Support and agree to the progression of proposals outlined in section 3 of this report to statutory consultation and notification progression, namely Emissions based residents permits; Hotel permits; Medical permits; Visitor and Trade parking permits.
- 2.3 Support and agree to the adoption of the On-street Parking Permit Terms and Conditions (Appendix 2).
- 2.4 Support and agree to delegate future operational changes to the On-street Parking Permit Terms and Conditions, including the withdrawal of permits, to be agreed between the Cabinet Member for Transport and the relevant Director.
- 2.5 To note the approvals previously provided by Single Member Decision (E3253) to take proposals to statutory consultation, namely on street parking charges; Sunday on street charges; Prioritise transport hierarchy; and the use of any surplus raised from the proposals.
- 2.6 To support and agree to the recommendation that only existing properties with a Hotel; Holiday Let; or Guest House permit will be able to have Hotel permits from the date the Traffic Regulation Order is sealed.

3 THE REPORT

Purposes of these Proposals

- 3.1 The purposes of these proposals are set out at 1 above (The Issue). Air quality impacts on pedestrian safety, managing traffic flows and availability of parking are all significant issues in our region, particularly in the city of Bath. Whilst the proposals detailed in this report are a separate standalone scheme, they are complimentary to other projects aimed at addressing these issues, including but not limited to the following:
 - (1) 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
 - (2) Improving the safety of cyclists and pedestrians through active travel schemes which rebalance priorities on our roads and build on social distancing needs
 - (3) Introducing a Clean Air Zone in central Bath, to encourage less polluting ways of travelling around the city
 - (4) Liveable Neighbourhoods policy and work concerning reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods.

Climate Emergency Context

- 3.2 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 this report does not attempt to justify the proposals on climate change grounds, it is anticipated that the measures set out in this report and which 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, will also significantly reduce the level of emissions that drive climate change, as a result, for example, of encouraging a switch to low emission vehicles.

Further Context

- 3.3 In order to develop a fair and balanced package of proposals to meet traffic management and pedestrian safety purposes, regard has been given (to an extent permissible with the requirements under s.122 of the Road Traffic Regulation Act 1984 discussed below) to a range of issues which appear to the Council to be relevant, including potential impacts on residents; commerce; tourism; carbon footprint and air quality; and transportation.

The Proposals

- 3.4 These proposals provide an opportunity to reset the rules of operation of schemes and address anomalies that have arisen over time to ensure consistency of the scheme and its operation.
- 3.5 New terms and conditions have been consultation upon to reflect the changes proposed (Appendix 2).

3.6 Emissions based residents permits

- (1) 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'. As CO₂ is by-product of internal combustion, a reduction in CO₂ emissions through reduced combustion will therefore reduce other pollutants within vehicle emissions which are harmful to pedestrian safety.
- (2) 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 and covers 1 in 3 vehicles currently with a permit. The proposed price increases by 5% for each subsequent and higher emissions band.
- (3) 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.
- (4) New charges as outlined in appendix 4 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. Current schemes outside Bath historically benefit from significantly lower permit costs despite the schemes operating identically.

- (5) 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.

3.7 Emissions based residents permits - measures to address issues and needs identified in the first stage consultation

- (1) After consideration of issues raised by respondents within the first stage consultation, the following changes are recommended as mitigating measures to the issues outlined in Section 7 below.
- (2) To make the permits more affordable for permit holders that will experience price rises the proposals have been amended to include a 6 month and 3-month permit that is charged pro rata against the annual cost. Current 6-month permits include a surcharge which will be removed.
- (3) A monthly permit will also be introduced which will include a modest additional surcharge of £0.62, equivalent to £7.44 over a full year, to reflect the increased bank charges and permit fees that the additional transactions will incur.
- (4) The inclusion of a monthly permit provides a more affordable and more flexible payment option. This allows permit holders to minimise the risk of losing time on a permit when they change their vehicle. Permit auto renewal features will be available for durations of 6 months or less, up to a maximum period of 1 year to ensure the address validation process can take place.
- (5) Proposed charges for emissions based resident permits based on CO2 emissions band and the new monthly durations are attached in appendix 4

3.8 Hotel permits

- (1) 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.
- (2) Permit availability remains linked to a property's number of discrete rooms, up to a maximum of 15. Holiday Let/Guest House entitlement remains at 1 permit per property.
- (3) 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 the cost of this may be passed on to guests at the discretion of the business.
- (4) 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.

3.9 **Hotel permits - measures to address issues and needs identified in the first stage consultation**

- (1) After consideration of issues raised by respondents within the first stage consultation, the following changes are recommended as mitigating measures to the issues outlined in Section 7 below.
- (2) Hotel permits will only be issued to those premises that hold a valid Hotel, Holiday let or guest house permit on the date the TRO implementing this proposal is sealed. No new properties will be entitled for the new Hotel permit.
- (3) Many people felt that requiring guests staying at establishments outside the city centre to use long stay car parks, which are all located in the city centre, was unreasonable. The proposals for Hotel permits have been amended to create an inner and outer zone for Hotel permits.
- (4) The Hotel inner/outer zone boundary aligns to Residents Parking Zone (RPZ) boundaries and has been based on the distribution of properties which have Hotel permits (appendix 5) and an analysis of permit demand (appendix 6).
 - a) **Inner Hotel permit zone** – includes the areas covered by the Central zone; zone 1; and zone 6 RPZs.

These areas contain the highest concentration of Hotel permit accompanied by high pressure for kerb space.
 - b) **Outer Hotel permit zone** – includes all other zones.

These areas have typically low pressure for kerb space and low number of Hotel permits
- (5) These zones also apply to holiday lets and guest houses, who will also use the new Hotel permit; however, they have not been included in the assessment of the zone boundary as they are only entitled to a single permit each. Additionally, a holiday let/guest house must be liable for business rates (NNDR) to be eligible for a Hotel permit.
- (6) Hotel permits issued within inner zone areas will only be valid in council long stay car parks. Hotel permits issued within the outer zone areas will be valid on street in the relevant RPZ.
- (7) To address the concerns regarding accessibility, Blue Badge holders who are guests of premises within the inner Hotel permit zone will be able to park on street with a valid Hotel permit AND where they display their Blue Badge.
- (8) It should be noted that currently Blue Badge holders may park for free within resident permit bays because of historic local policy. This local policy has now changed, and Blue Badge holders will no longer be able to do this once enabling work is complete, subject to resources being identified. See paragraph 7.10.

3.10 **Medical permits**

- (1) 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.
- (2) 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 resident's permit, currently £100.
- (3) 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.

3.11 **Visitor permits**

- (1) 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.
- (2) 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.

3.12 **Trade permits**

- (1) 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.
- (2) Existing charges for the central zone and zone 1 (Trade inner zones) are £3 per hour, with all other residential zones (Trade outer zones) charged at £6.60 per day.
- (3) Proposed price increases for trade 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
Trade outer zones (daily charge)	£7	£7.50	£8

3.13 **On Street Permit Consultation Outcomes**

- (1) The results and analysis from the feedback received is detailed within the Parking Permit Consultation Outcomes Report, attached as Appendix 1
- (2) 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.
- (3) 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.
- (4) There was broad support amongst respondents for the hotel and medical permit proposals and the new terms and conditions.
- (5) The outcome for the proposals to increase charges for trade and visitor permits, whilst almost evenly matched, was that a small majority were not in favour. 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.
- (6) Within the 3,380 free text responses respondents raised a broad range of themes and issues which are summarised within appendix 3.

3.14 **Proposals previously approved by Single Member Decision (E3253)**

- (1) In February 2021, the Cabinet Member for Transport approved a series of proposals to take forward to statutory consultation, which are to be included within statutory consultation alongside all proposals outlined within this report. This includes:
 - a) On street Parking Charges
 - b) Sunday on street charging
 - c) Prioritisation of the transport hierarchy - the removal of the 10% paid for parking discount for residents.

3.15 **Timetable for implementation**

- (1) Delivery is subject to challenges during statutory consultation phase.
- (2) Implementation of the new On Street Parking Permit Terms and Conditions is proposed for January 2022. This ensure they align with the TRO changes required by the proposals set out in this report and approved by Single Member Decision (E2353).
- (3) Implementation of permit changes is proposed for January 2022, with future year increase for Trade and Visitor permits set for January 2023 and January 2024.

- (4) Implementation of on street charges as approved by Single Member Decision (E2353) are proposed to come into effect as below:
- a) Year 1 – January 2022 to 1st April 2022. Additional time is required to implement changes to on street charges to facilitate Sunday charging and RPZ operation.
 - b) Year 2 – January 2023
 - c) Year 3 – January 2024.

4 STATUTORY CONSIDERATIONS

- 4.1 Changes to parking charges are subject to the processes set out in the RTRA 1984, which include, in some circumstances, a requirement to consult bodies and consider public comments. The council is also able to carry out public engagement in addition to that required by the Act.
- 4.2 Under section 122 of the RTRA 1984, it is the duty of the local highway authority exercising its functions under that Act (such as setting parking charges) to seek “to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway”. It must seek to secure those purposes so far as is practicable having regard to the following matters:
- (1) *the desirability of securing and maintaining reasonable access to premises;*
 - (2) *the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;*
 - (3) *the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);*
 - (4) *the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and*
 - (5) *any other matters appearing to the strategic highways company or the local authority to be relevant.*
- 4.3 The proposals set out in this report are designed to achieve the purposes set out at 1.1 and 3.1 above, taking account of and in accordance with the section 122 duty.
- 4.4 In particular 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 RTRA 1984 and that this report does not attempt to justify the proposals on climate change grounds. The information on climate change is included solely because it is deemed to be of wider interest to Cabinet Members following the declaration of the Climate Emergency in March 2019.

4.5 There have been a number of high profile legal challenges regarding the interpretation and application of this legislation and having considered those challenges the Council considers that all the proposals outlined in this report are in accordance with the requirements of the RTRA 1984. In particular the Council considers that the introduction of an emissions and fuel based pricing policy, as outlined at 3.6 in this report, is not contrary to the RTRA 1984 as the proposals are not intended to raise revenue to fund projects to address air pollution risks to pedestrian safety but instead are themselves the measures to address such risks.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 The funding required to implement the changes to parking charges is proposed to come from parking charges and permit fees in accordance with s55 of the RTRA 1984 and Single Member Decision E3253. This is estimated at £90k.

5.2 Changes to permit parking charges through the introduction of an emissions-based charge as proposed (see paragraph 3.6) are forecast to generate additional income of £135k per year. The use of any surplus generated from these proposals, as approved by Single Member Decision (E2353), are to be allocated to a revenue reserve account to be applied (where permissible under section 55 of the Road Traffic Regulation Act 1984 (RTRA 1984)), to:

- (1) Cover the cost of implementing the proposals.
- (2) Cover future maintenance of assets to ensure the effective parking enforcement of restrictions.
- (3) To support the development of sustainable transport schemes in accordance with statutory obligations.

5.3 In accordance with section 55 of the RTRA 1984 Local Authorities must keep a special account of income and operational expenditures relating to designated parking places. In essence parking charges must not be increased in order to generate income for the General Fund. Additionally, it is recognised that the 1984 Act is not a fiscal measure and does not authorise the authority to use its powers to charge for parking in order to raise surplus revenue for other transport purposes funded by the General Fund.

5.4 Parking charges are recognised within the Parking Strategy with the intention to achieve the Council's transport policy aims of reducing congestion and improving air quality for the benefit of public safety and improved parking management. Any surplus must be applied for a purpose specified in section 55(4) of the 1984 Act and will be allocated to fund improvements to transport and transport related schemes, such as Safer Routes to Schools

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7 EQUALITIES

- 7.1 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.
- 7.2 The proactive first stage consultation undertaken between 27 April and 24 May allowed us to consider additional needs and feedback that we may not have considered. The Equalities Impact Assessments have been revised to reflect changes in the proposals to mitigate issues raised by respondents during the consultation. These are attached within appendix 7.
- 7.3 By their very nature, increased charges may have an impact on some vulnerable groups more than others; however, this should also be considered alongside the positive impacts, such as improved air quality, of these proposals on other vulnerable groups.

Emissions Based residents permits

- 7.4 A Distributional Impact Assessment (DIA) was undertaken to assess the impact of the resident permit proposals on relevant socio-economic groups and the report is attached as appendix 8. The same methodology was used in this assessment as was used for the Clean Air Zone.
- (1) Anonymised data on vehicles registered to permits across the residents parking zones was analysed against census data and Indices of Deprivation (2019) statistics which measure relative levels of deprivation in England across 32,844 areas (Lower Super Output Areas – LSOA) which are then ranked accordingly. It should be noted that the Indices of Deprivation (2019) are grouped into quintiles for the purposes of this report.
 - (2) A screening and assessment process was used to determine if an identified impact area is likely to affect a social group. Where an impact is identified this can be further assessed to determine if the impacts are proportionate across this group.
 - (3) The DIA assessment identified an impact on ‘Affordability’ within ‘Low Income Households’ and a further, more detailed assessment, of this was undertaken which identified that 65% of permits (assuming one vehicle per permit) would see a cost increase of up to 50%, and further 4% experiencing a cost increase of above 50%.
 - (4) The net impact on permit charges across the RPZs indicates that the distributional impact of affordability is slightly uneven compared to the distribution of income deprivation. Importantly though, given that affordability is intrinsically linked with income deprivation, the most income deprived quintiles (1 & 2) are less proportionally impacted compared to the proportion of population in those quintiles. The impact on the upper (4) and middle (3) quintiles are the most uneven, being under and over-represented respectively; impact on the least deprived quintile is proportionate to its share of population.
- 7.5 Additional analysis was undertaken by the council independently to further validate and consider this impact in more detail, its results are shown in Appendix 9. Indices of Deprivation are measured in deciles which provided additional granularity compared to the DIA.

- 7.6 The results of this analysis show the distribution of vehicles affected by the charges across these 10 deciles. The average proportion of vehicles that will be charged is 69% across all deciles with no significant variation from this average shown in individuals deciles. This strongly indicates that there is no disproportionate impact on more deprived areas. It should be noted that the actual number of vehicles affected in the lower deciles is lower than higher deciles and this reflective of the smaller population from these deciles within RPZs, as shown in the DIA (appendix 8 – Figure 3.2 and Table 4.3).
- 7.7 The average additional cost of permit for a vehicle affected by the proposals is £25, again with no significant variation across individual deciles.
- 7.8 It is noted that whilst there is no disproportionate impact to more deprived areas, its acknowledged that individuals living within these areas could be impacted more significantly by an increase in costs than those in less deprived areas. Measures to mitigate this impact are outlined paragraph 3.7 of this report and within appendix 7.
- 7.9 The Blue Badge scheme provides people with a mobility based or hidden disability with parking concessions allowing them to park closer to their destination, it is not means tested and therefore not a financial concession.
- 7.10 From December 2020 a change in local policy means that a Blue Badge no longer entitles the holder to park in a permit holders bay without a residents parking permit. This change was made to align to the national Blue Badge scheme and provides consistency for all Blue Badge holders. Residents with Blue Badges that live in RPZs are entitled to a free resident's permit so they can use their Blue Badge in other vehicles and leave their own vehicle legally parked at home. However, the implementation of this new policy requires enabling works to assess where existing advisory bays are and where additional dedicated Blue Badge parking is needed to ensure that local amenities within RPZs remain accessible to Blue Badge holders. This enabling work is subject to resources being allocated as all the Council's area TROs must be reviewed and varied at the same time to ensure the policy can then be consistently applied. There are currently no resources identified in this year to undertake this enabling work, therefore Blue Badge holders will remain able to park in residents permit bays without a residents permit as long as they display their Blue Badge.
- 7.11 Once this enabling work is complete and the policy has been enacted, Blue Badge holders that are residents of RPZs will be entitled to a residents permit free of charge. These changes will be communicated on the council's website and to all Blue Badge holders in Bath & North East Somerset.

Hotel permits

- 7.12 People who commented on the hotel permit proposals felt that requiring visitors with reduced mobility and accessibility to park in off street car parks during their stay would be detrimental to their needs and likely to increase anxiety regarding safety and security.
- 7.13 Blue Badge holders are permitted to park on yellow lines for up to 3 hours 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>. This also allows Blue Badge holders to

park for an unlimited time in on street pay and display bays located across the city centre.

7.14 Currently all Blue Badge holders can park for free in residents permit bays with no time limit with display of their Blue Badge. When the new policy is enacted (paragraph 7.10) they will no longer be able to do this.

7.15 The Council recognises that whilst the Blue Badge scheme provides alternatives options for Blue Badge holders (paragraph 7.13) this reduces the options and flexibility available to them. Measures to mitigate these impacts, are outlined in paragraph 3.9 of this report and appendix 7.

8 WIDER AIR QUALITY INFORMATION

8.1 Achieving compliance with air quality standards across Bath will result in widespread public health improvements. 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>.

8.2 Transport is widely acknowledged as a key driver of air quality issues. It is estimated in B&NES that around 92% of all Nitrogen Oxide (NOx) emissions are attributable to road traffic.

8.3 Consequently, the Bath Clean Air Plan (CAP) has been developed with an understanding of the wider transport, business and air quality strategies in B&NES and beyond, in order to accord with these policies (for example the Getting Around Bath Strategy and Joint Local Transport Plan), wherever possible. Whilst the objectives of the CAP overlap with other local and regional strategies, and its delivery should be beneficial to achieving the objectives within these strategies, the CAP has its own specific objectives (resulting from the legal direction on the Council) and therefore does not seek to achieve all other local transport objectives such as

9 OTHER OPTIONS CONSIDERED

9.1 Leave all schemes as they are.

- (1) This has been discounted as the changes are aimed to facilitate the achievement of strategic outcomes of local transport policy and align with the Council policy on Liveable Neighbourhoods, in addition to addressing air quality issues.

9.2 Digitise all permits with no other scheme changes.

- (1) The digitisation of all remaining paper permits within MiPermit will provide efficiency improvements to the issue and management of these remaining permits. The continuation of schemes on their current terms and conditions, whilst maintaining a trust-based approach, has been discounted as the council has evidence of misuse by permit holders, particularly within the current hotel and medical permit schemes.

10 CONSULTATION

10.1 Proposals were presented to Climate Emergency and Sustainability PDS panel on 13 January 2020 for consideration and feedback has been considered by the Cabinet Members for Transport in progressing these proposals. Progression of these proposals was paused due to uncertainty caused as a result of the COVID pandemic.

10.2 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.

- (1) A web-based questionnaire was developed to seek views on the proposals and new terms and conditions, with questions designed to minimise any bias or leading of respondent’s answers. A copy of the survey questionnaire is provided as Appendix PPC1 within Appendix 1 of this report. 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

- (2) Following consideration of the responses to the consultation, the proposals have been amended to mitigate issues and needs raised by respondents and these are outlined in section 3 of this report.

10.3 Proposals are subject to further statutory public consultation which, together with the first stage consultation process outlined in paragraph 10.2, will meet all relevant consultation, consideration, and notification requirements in the RTRA 1984.

- (1) This final statutory consultation is to include:

Emissions based permits charges
On street parking charges
Sunday on street charges
Visitor permits charges
Medical permit charges
Hotel permit charges
Prioritise transport hierarchy

Contact person	Andy Dunn 01225 39 5415
Background	• CES Policy Development & Scrutiny Panel 13 January 2020 -

papers	<p>https://democracy.bathnes.gov.uk/documents/s59857/Parking%20Charges%20Policy.pdf</p> <p>It is important to note that the description of the purpose and detail of the proposed measures given in this earlier report to CES PDS has in part been superseded by later reports.</p> <ul style="list-style-type: none">• E3235 - Addressing air quality and traffic management issues through the management of parking behaviour on the highway - https://democracy.bathnes.gov.uk/ieDecisionDetails.aspx?ID=1507
Please contact the report author if you need to access this report in an alternative format	

Parking Permits Consultation

Consultation Outcome Summary

24 June 2021

Revision 01

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Revision	Description	Issued by	Date
00	Draft	AD	22/06/2021
01	Final	AD	24/06/2021

Authors **Andy Dunn & Jane Whiteman**

Approved **Gary Peacock**

Date **24/06/2021**

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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.

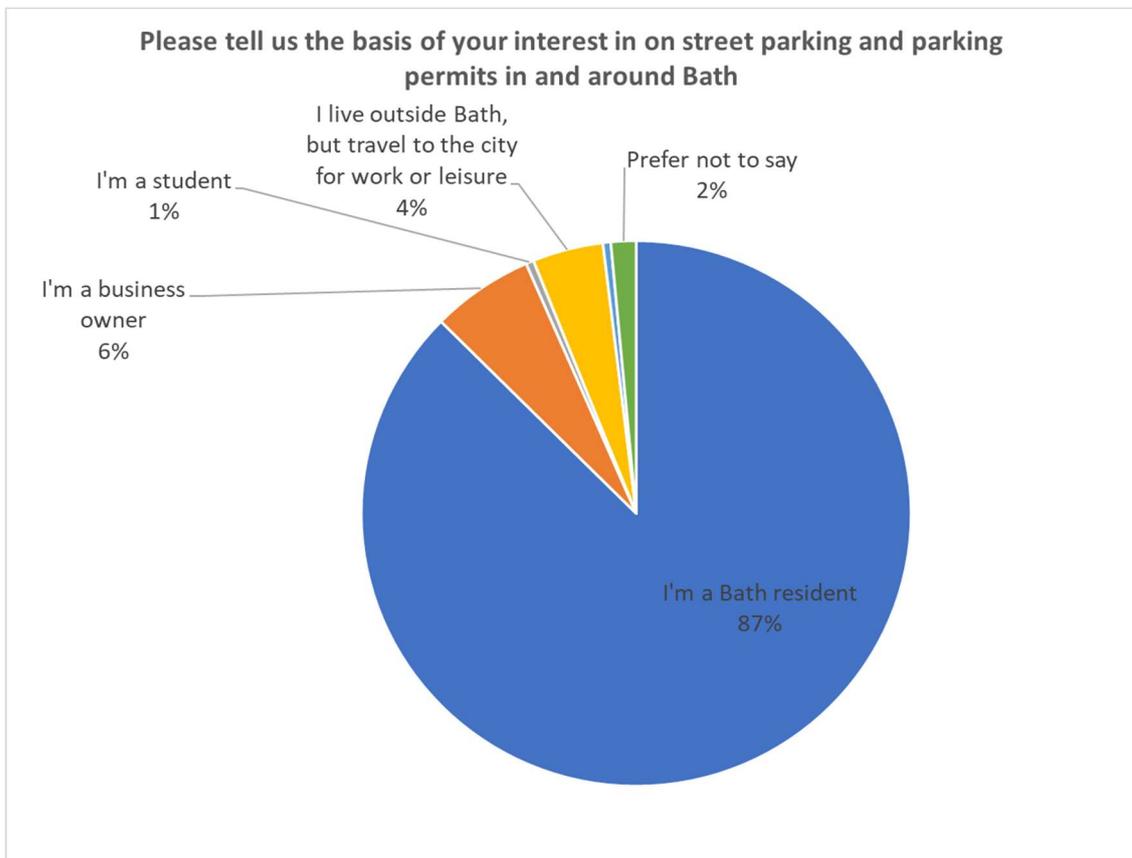


Figure 4-1: Basis of Interest

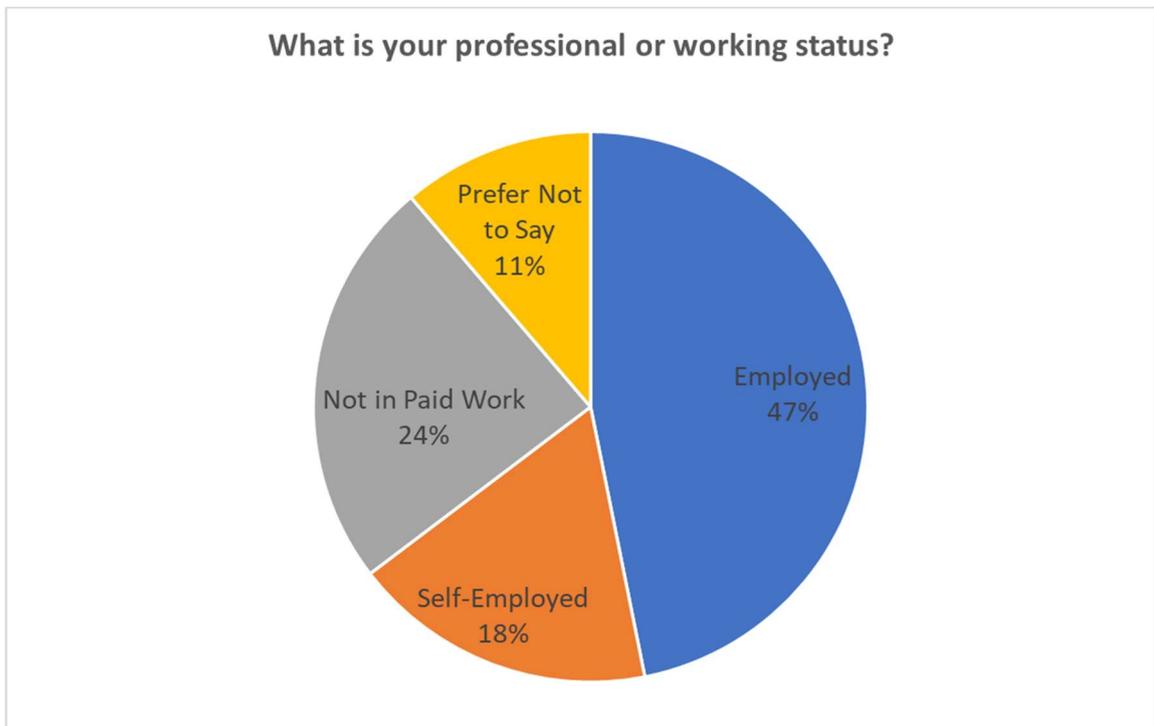


Figure 4-2: Working Status

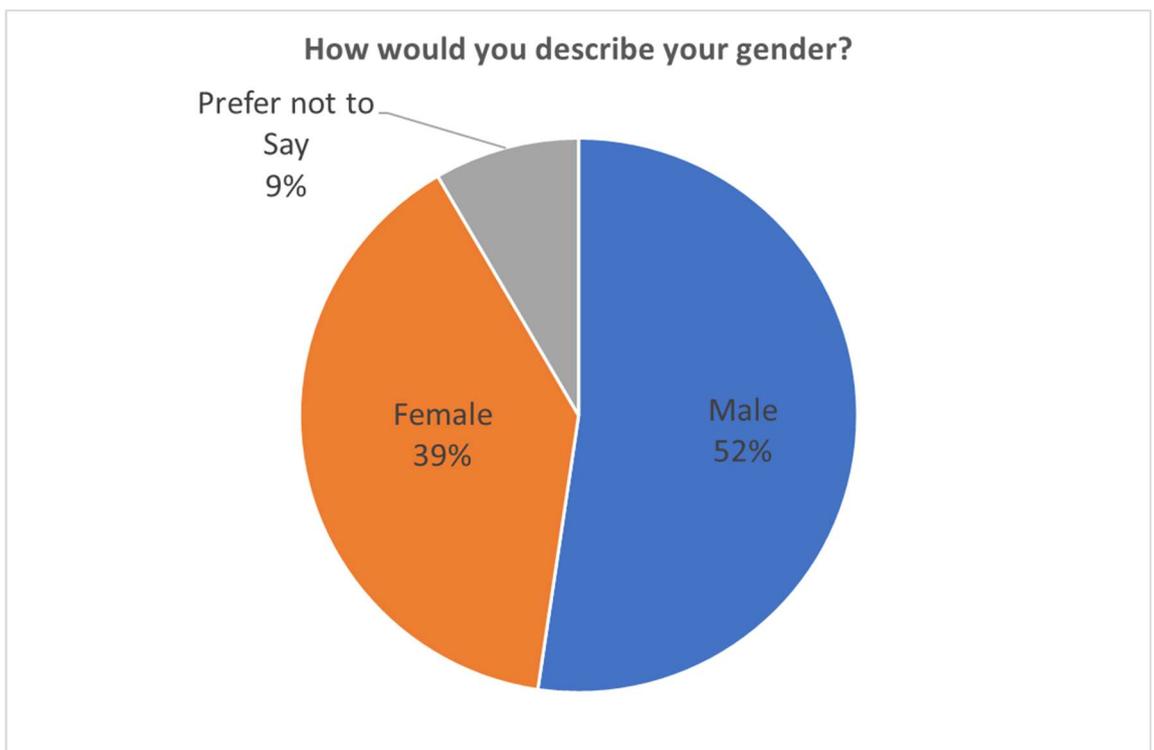


Figure 4-3 How do you describe your gender?

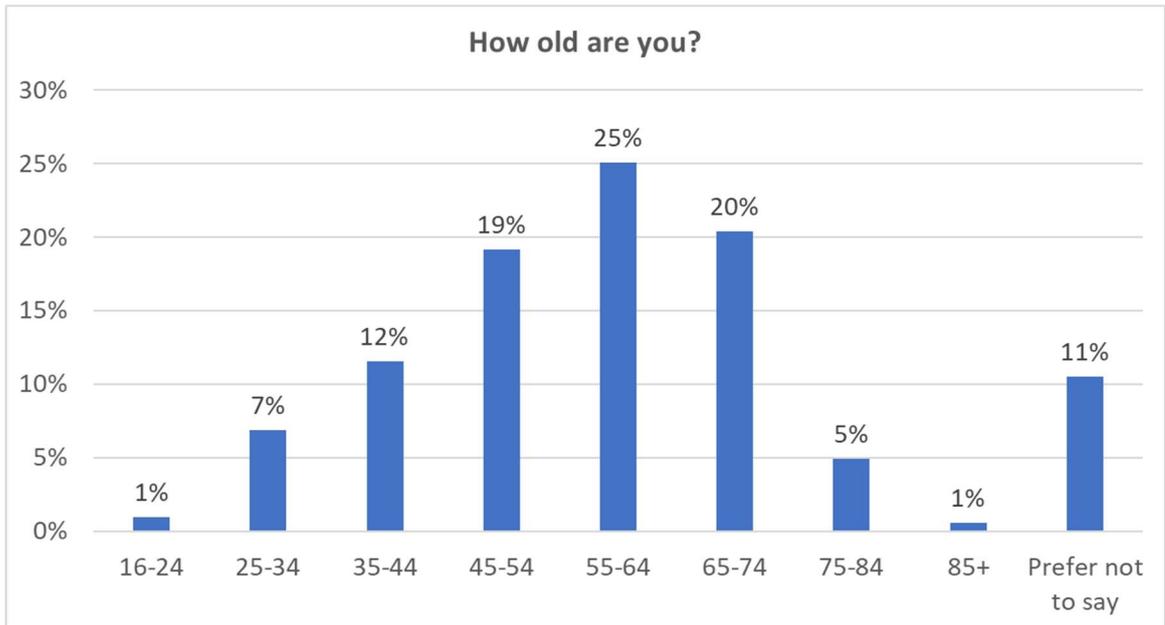


Figure 4-4: Age

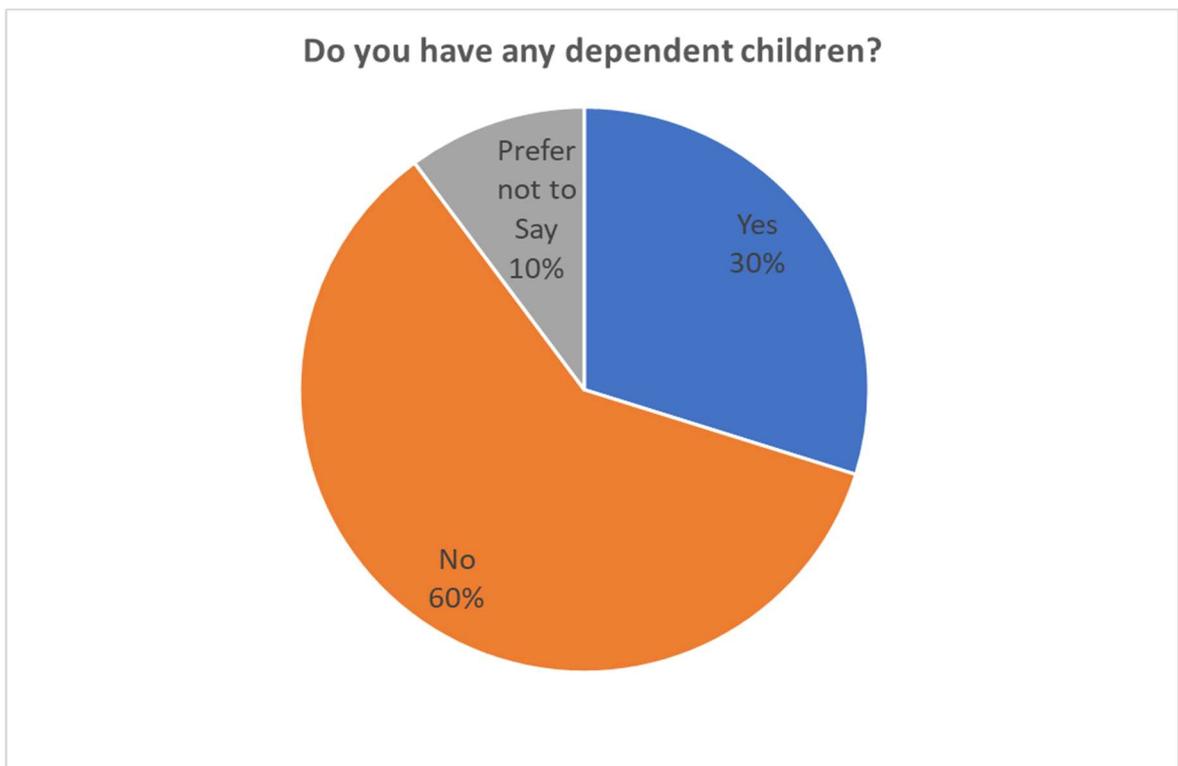


Figure 4-5: Dependent children

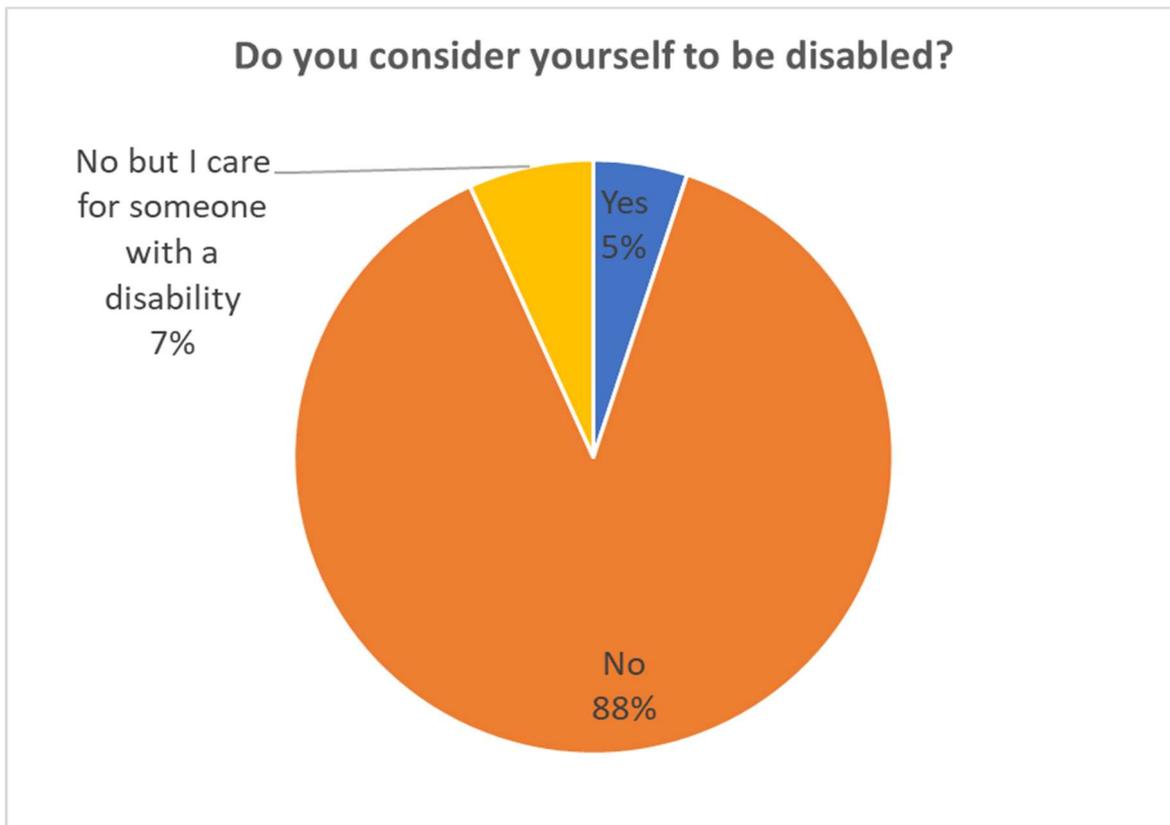


Figure 4-6: Do you consider yourself to be disabled?

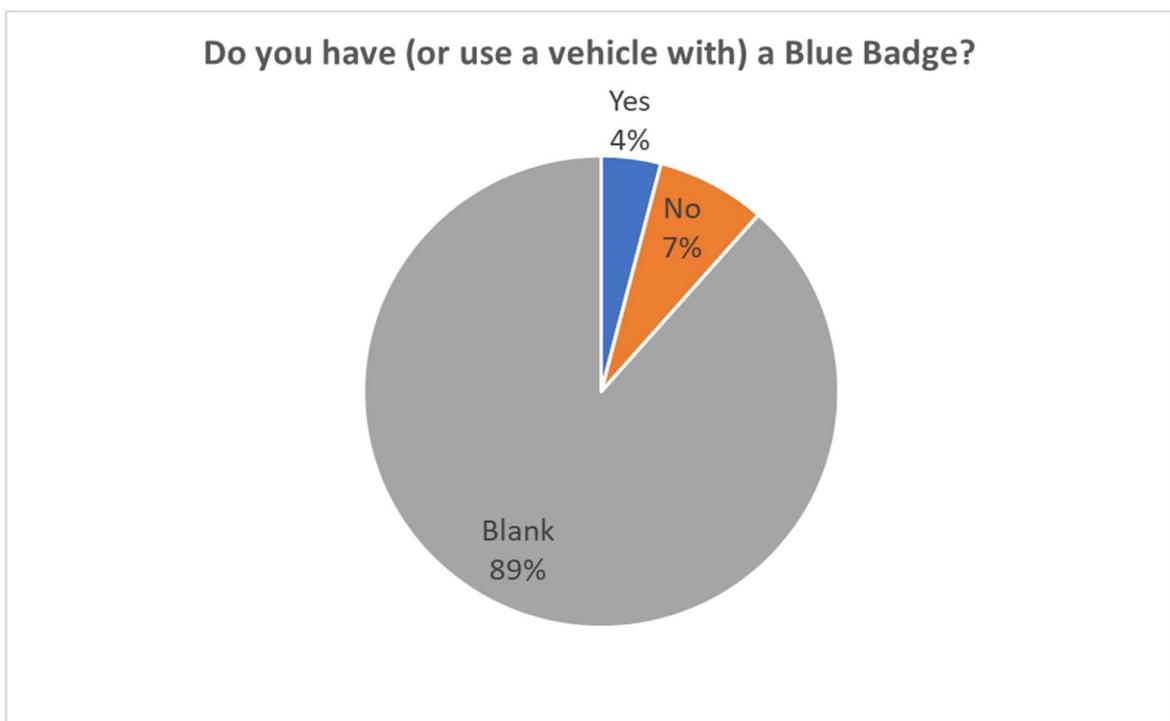


Figure 4-7: Do you have (or use a vehicle with) a Blue Badge?

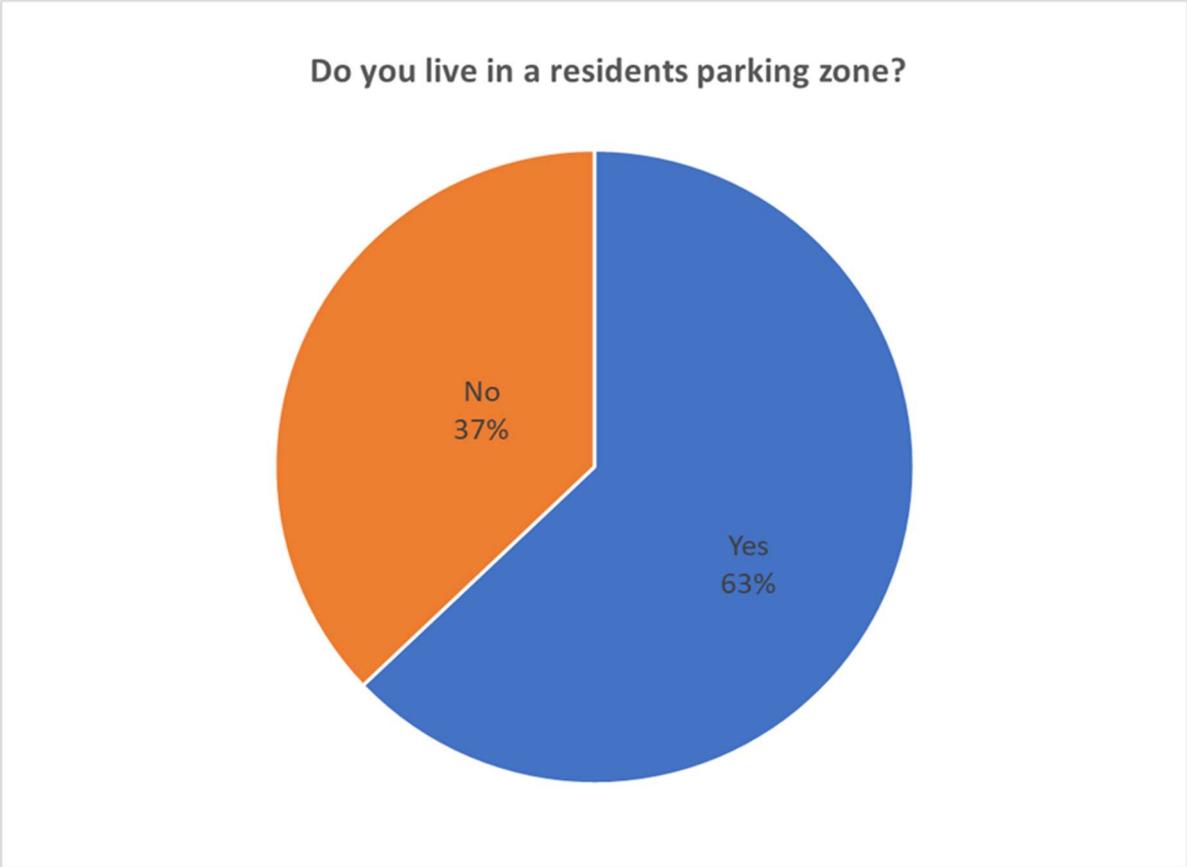


Figure 4-8: Do you live in a residents parking zone?

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.

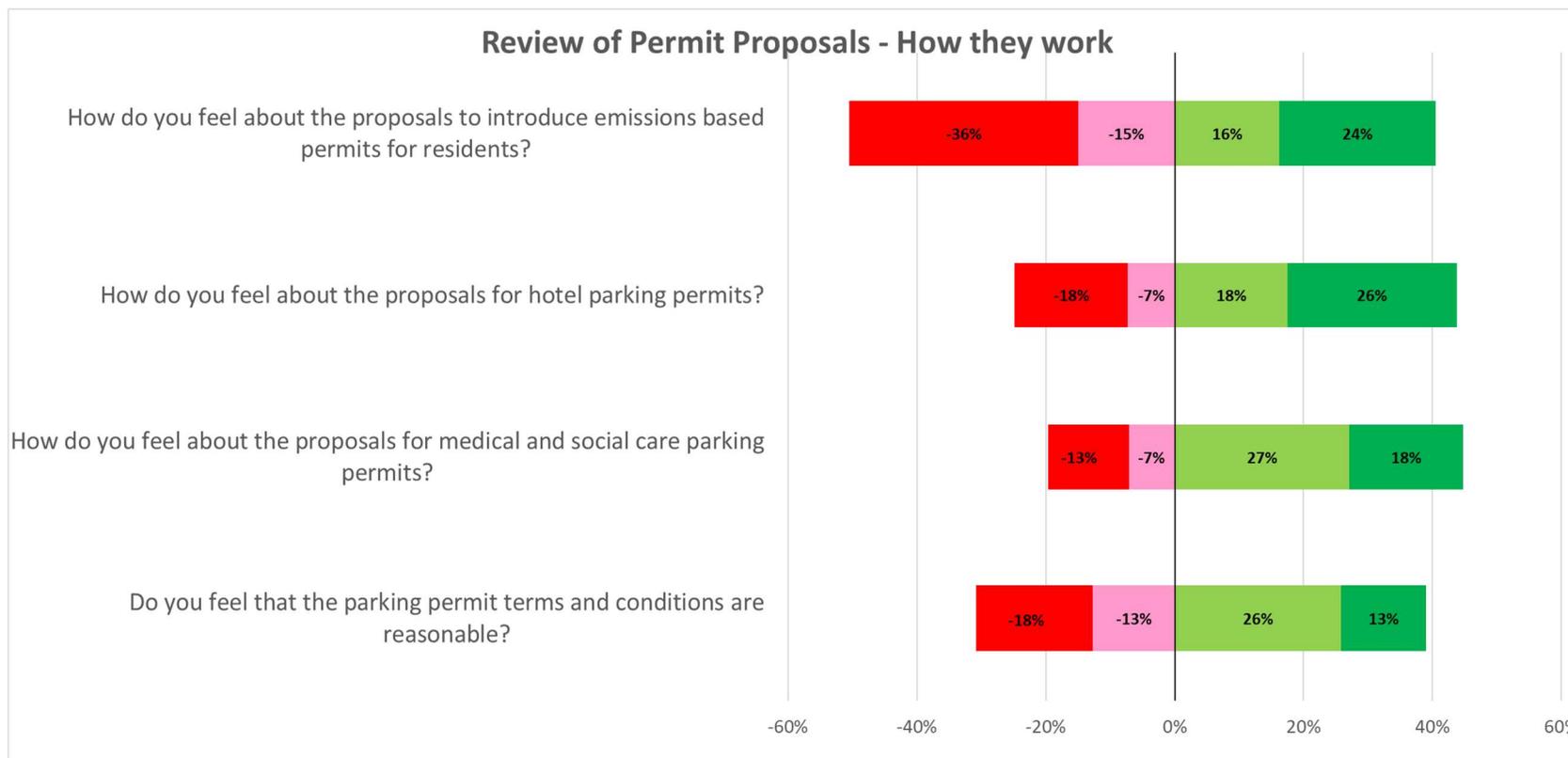


Figure 5-1: Review of Permit Proposals – How they work

Review of Permit Proposals - New charges

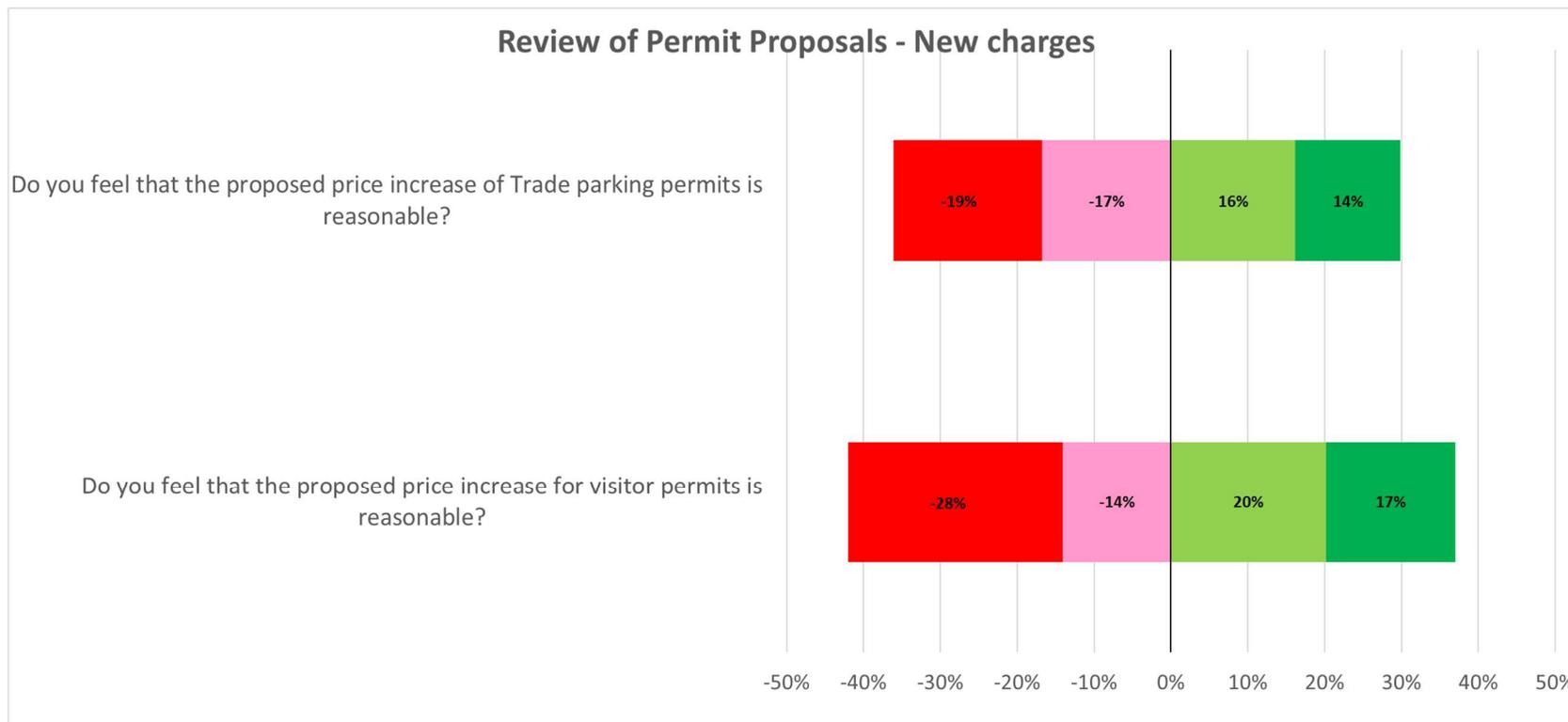


Figure 5-2: Review of Permit Proposals – New charges

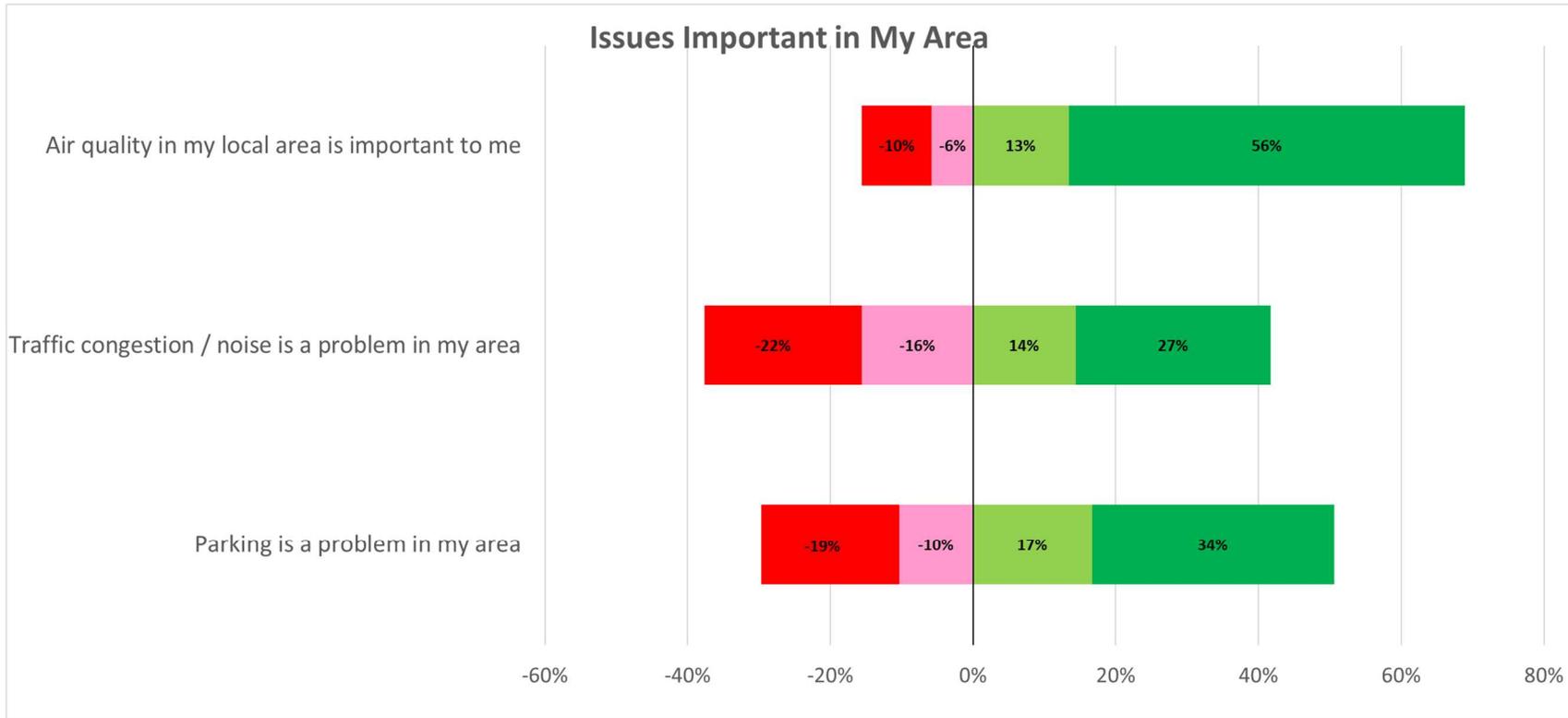


Figure 5-3: Issues Important in My Area

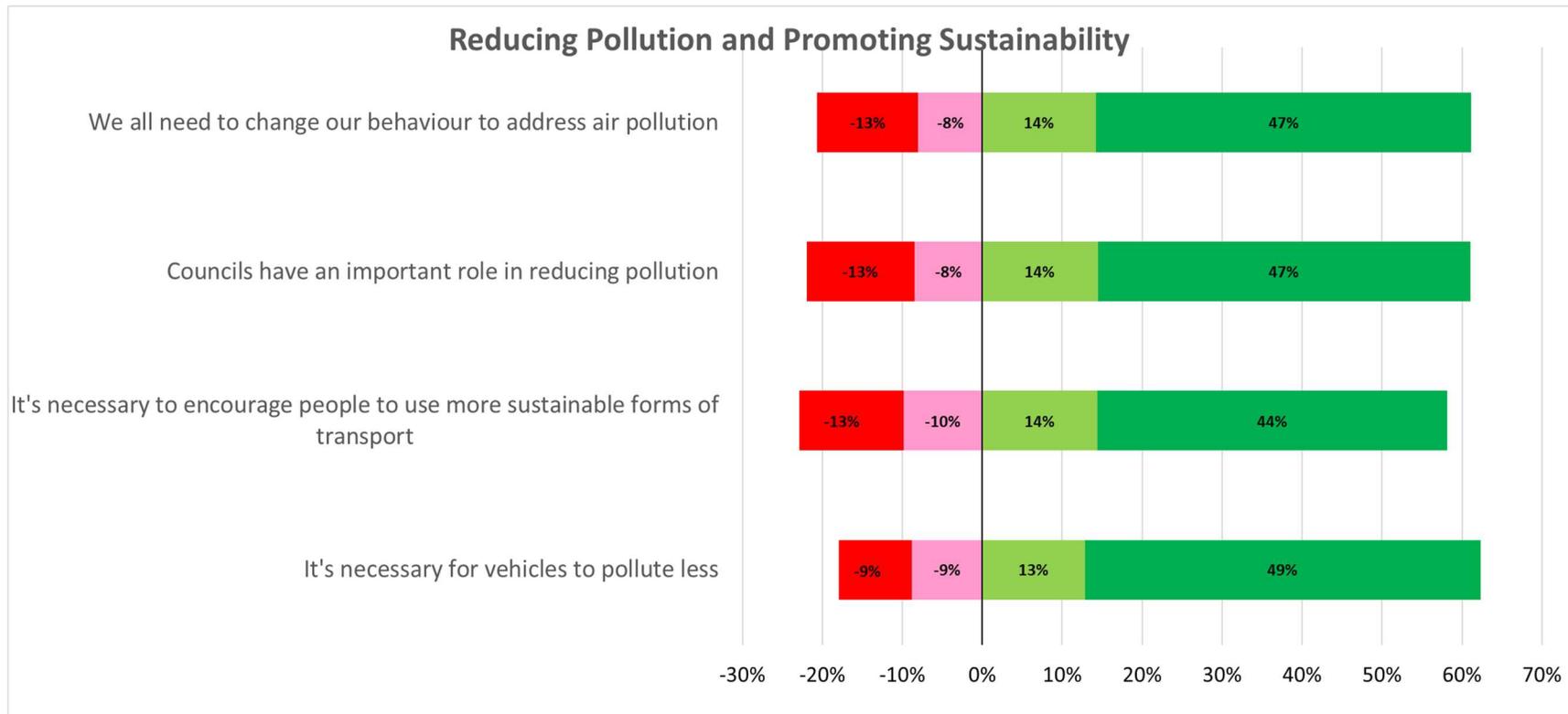


Figure 5-4: Reducing Pollution and Promoting Sustainability

	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

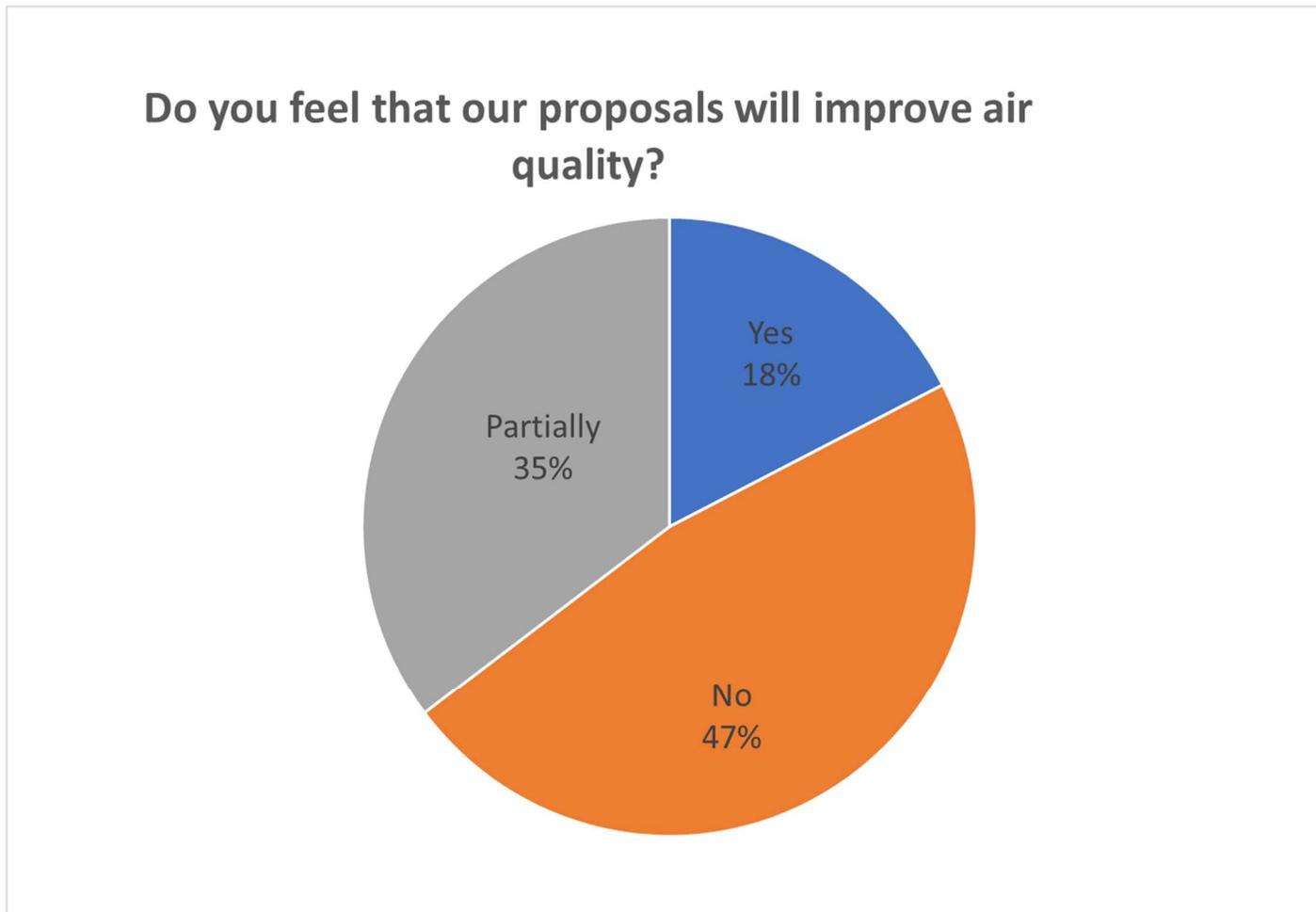


Figure 5-6: Will proposals improve air quality

2021 Parking Consultation: Results by area (District)

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

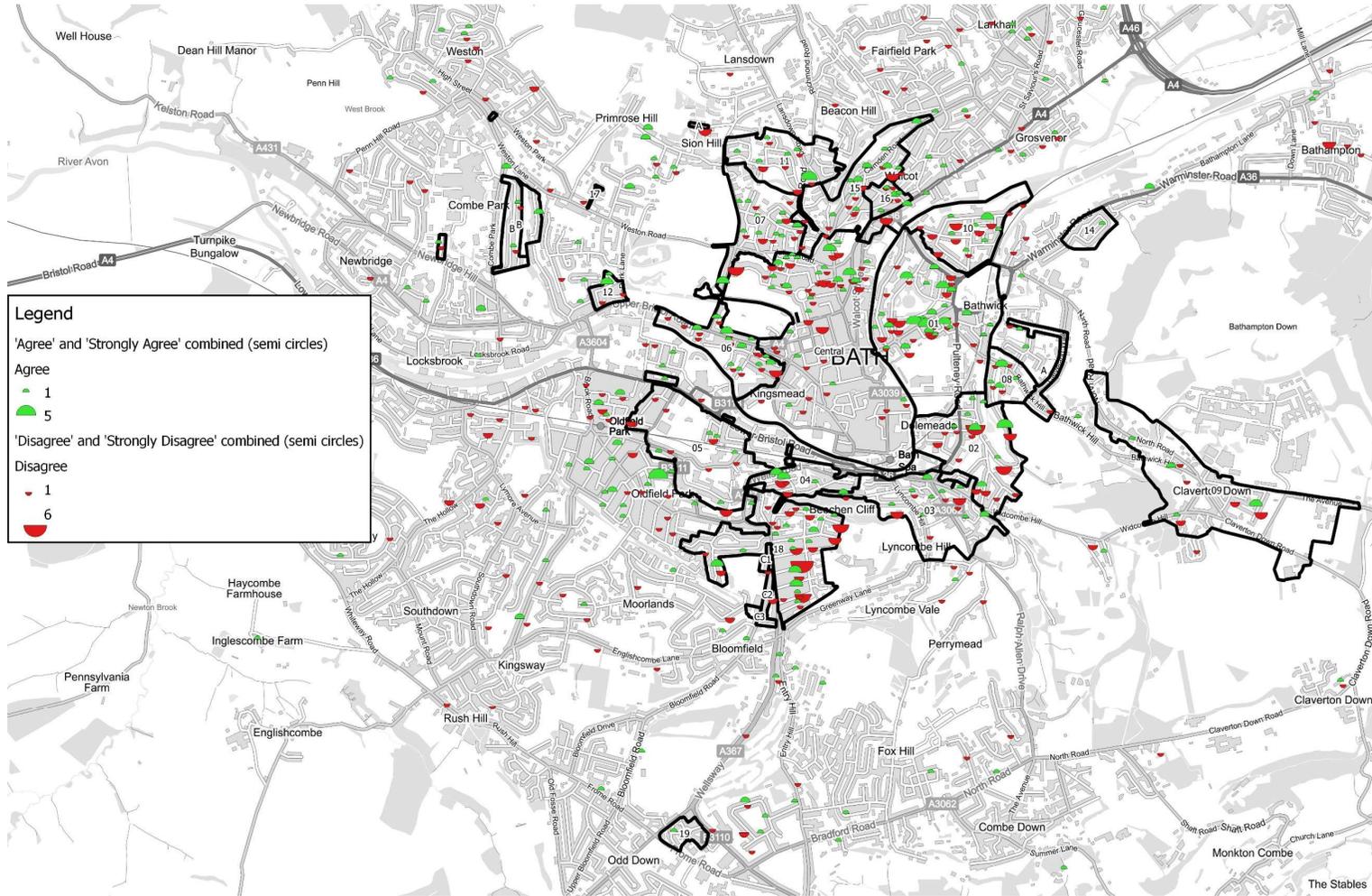


Figure 5-7: Emissions based permits postcode plot – Bath area

2021 Parking Consultation: Results by area (District)

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

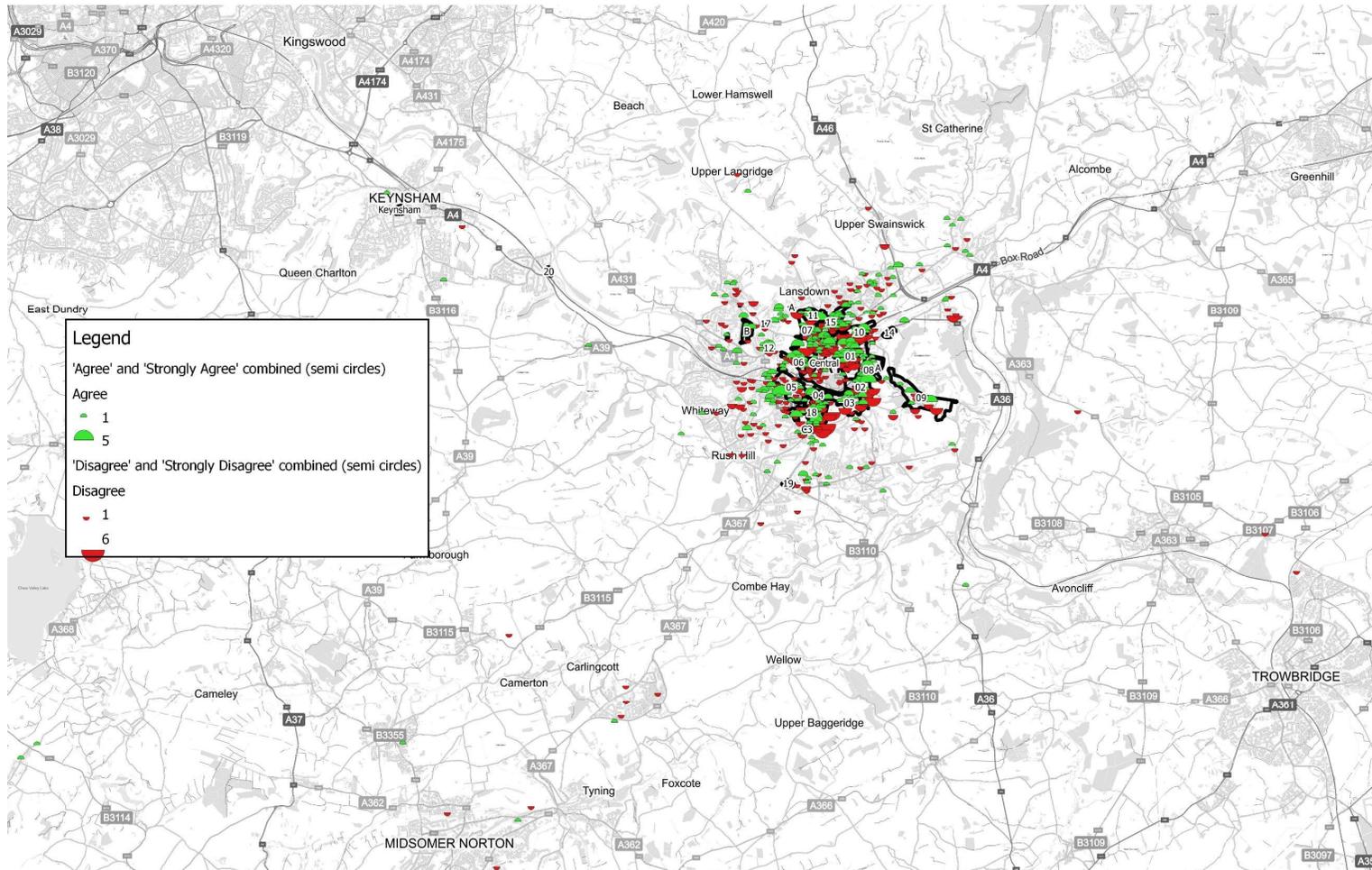


Figure 5-8: Emissions based permits postcode plot – All Bath & North East Somerset area

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

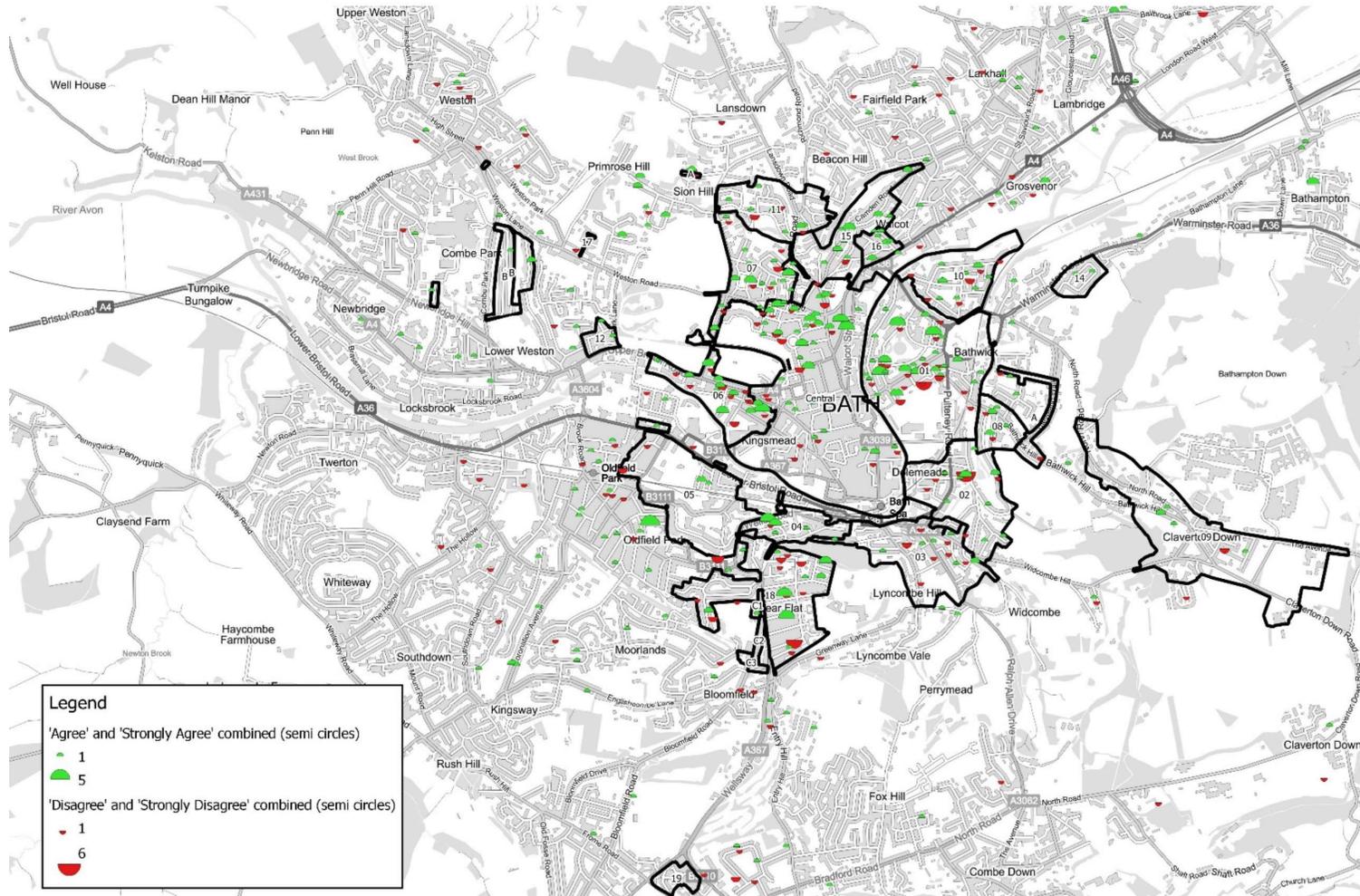


Figure 5-9: Hotel permits review postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)
How do you feel about the proposals for medical and social care parking permits?

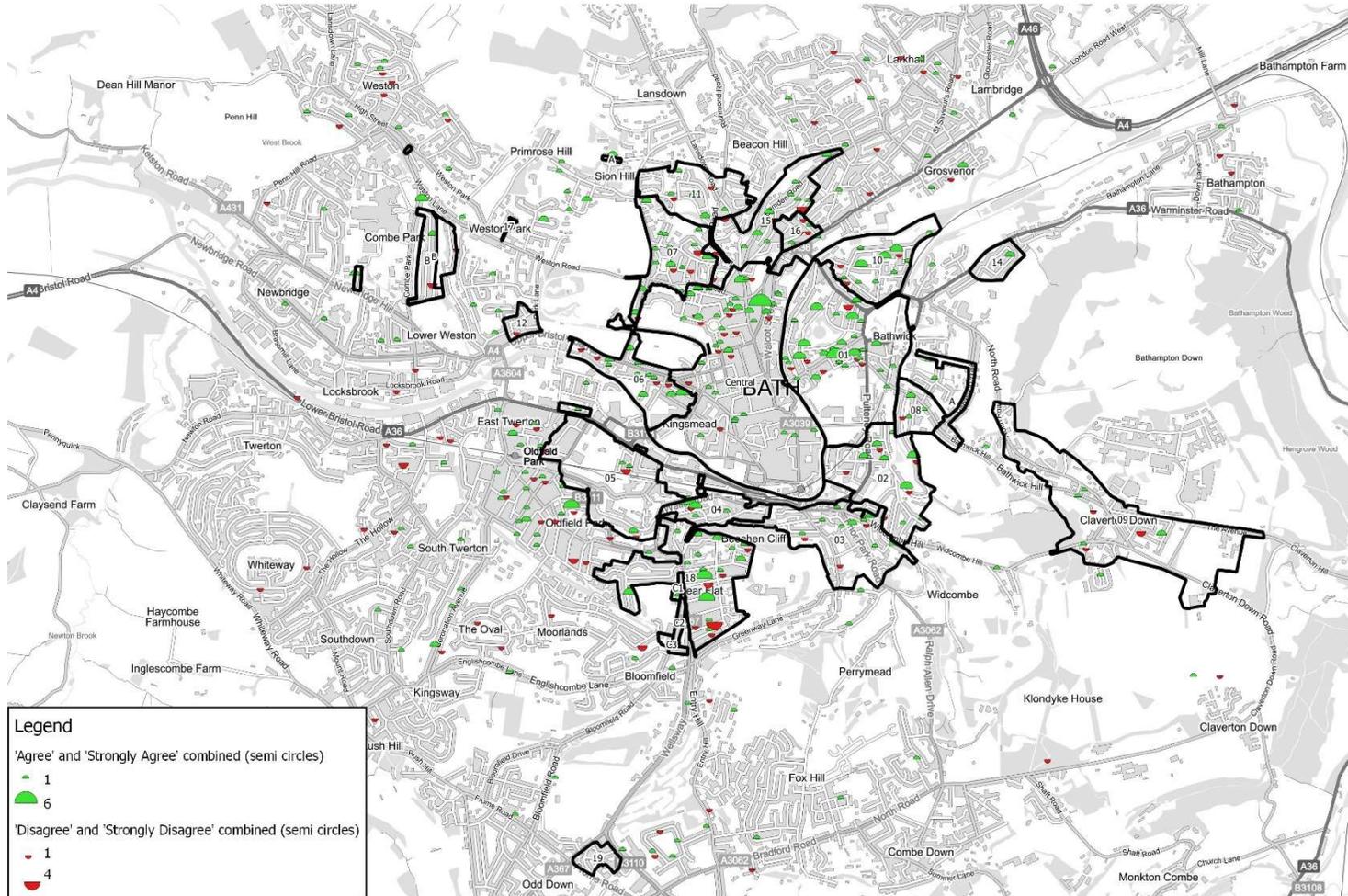


Figure 5-10: Medical permits review postcode plot –Bath area

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

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

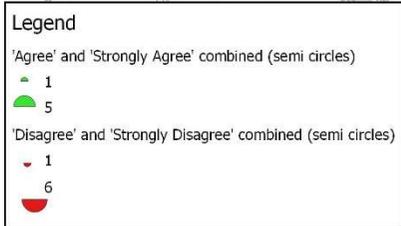
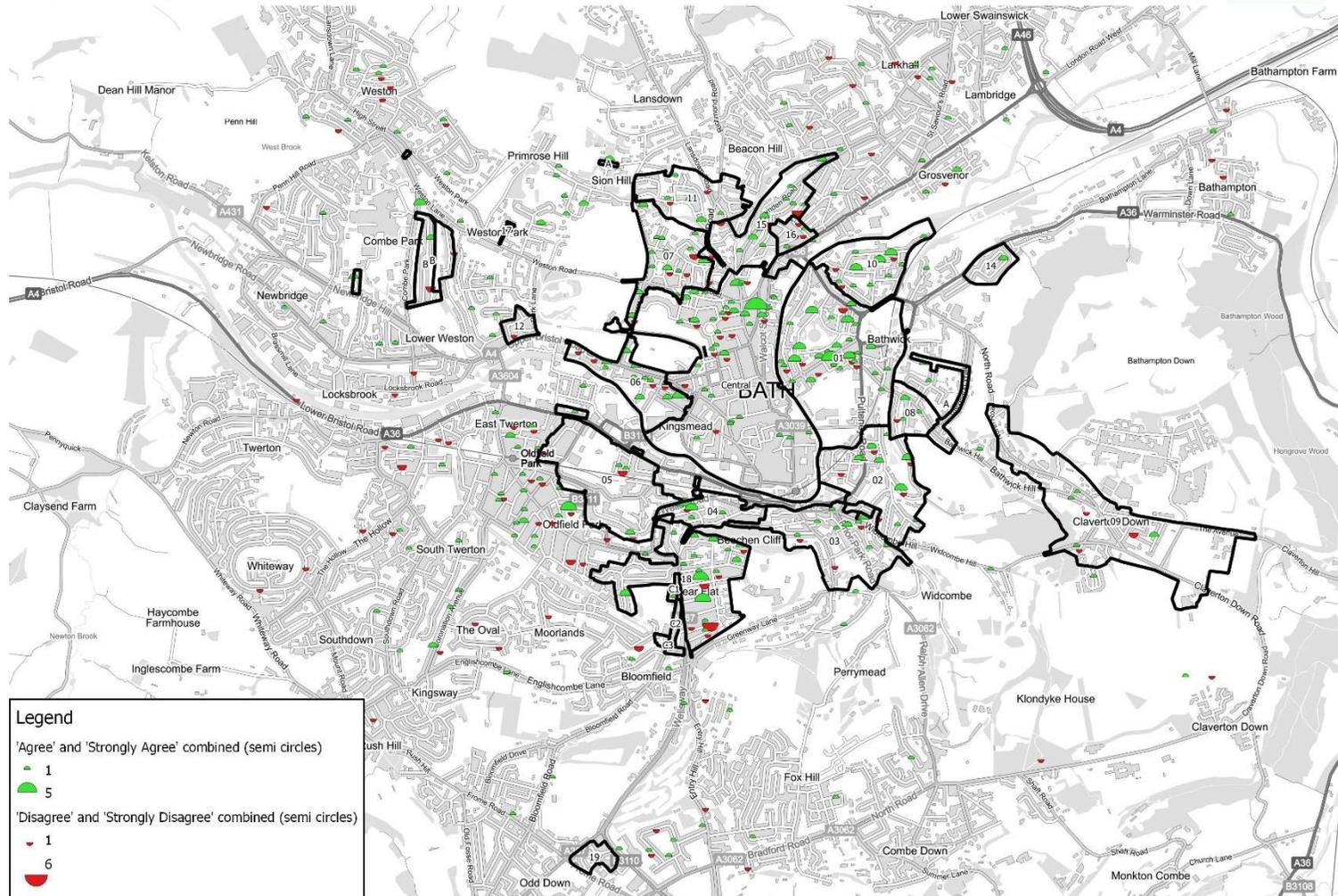


Figure 5-11: Visitor permit charges postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)
 Do you feel that the proposed price increase of Trade parking permits is reasonable?

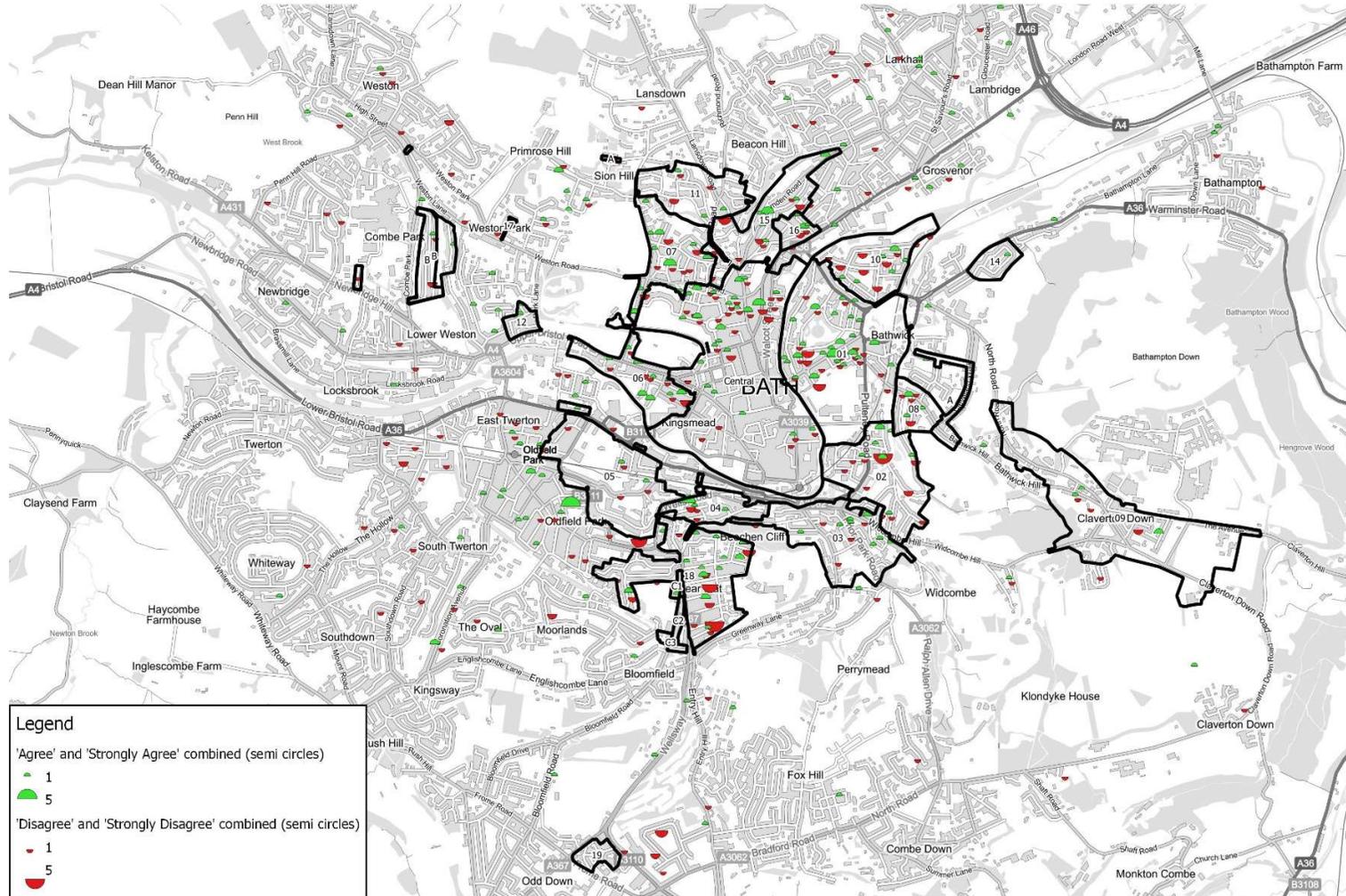


Figure 5-12: Trade permit charges postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath)
 Air quality in my local area is important to me

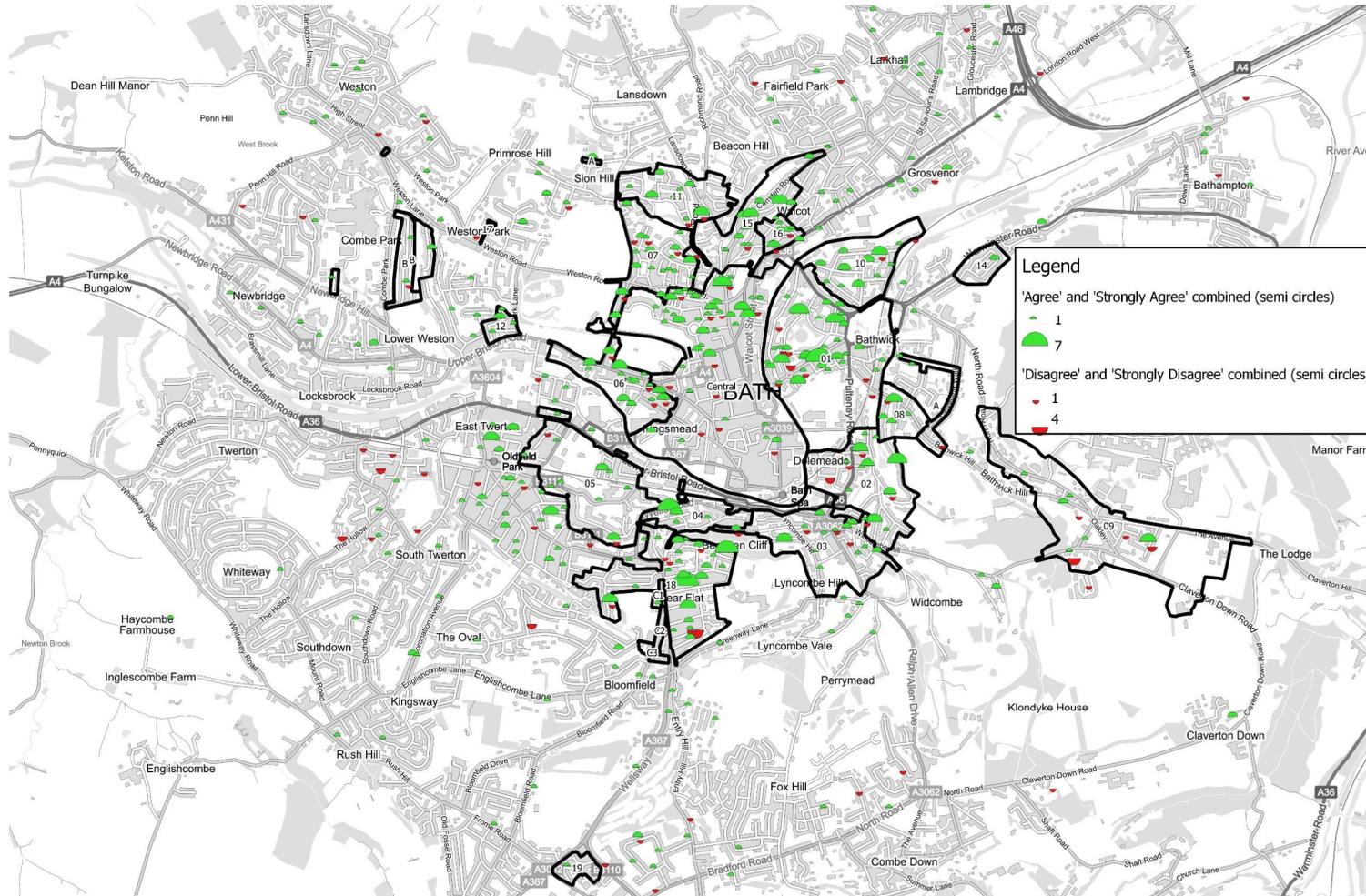


Figure 5-13: Importance of air quality postcode plot –Bath area

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

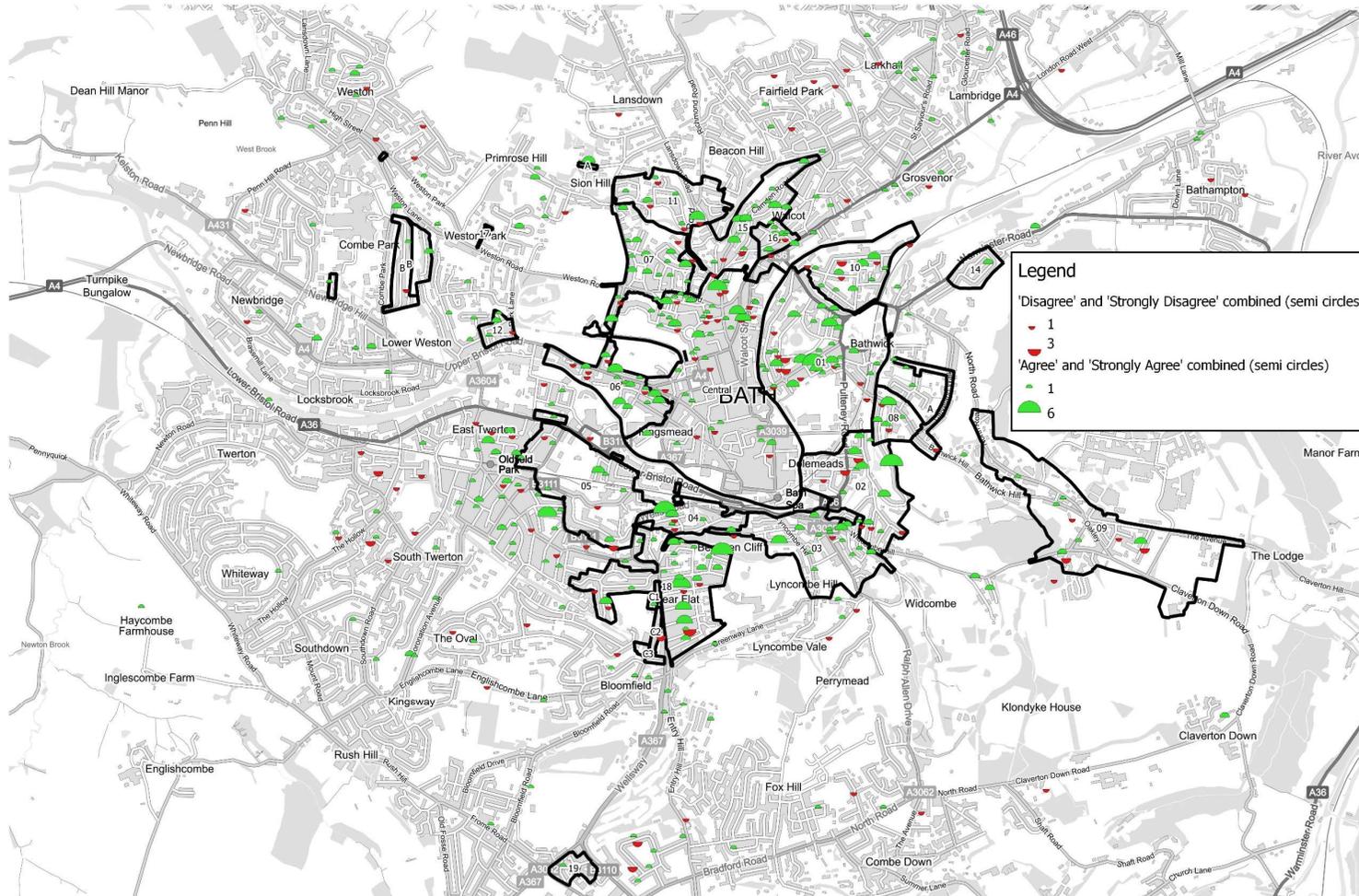


Figure 5-14: Behaviour change needed to address air pollution postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking)
Councils have an important role in reducing pollution

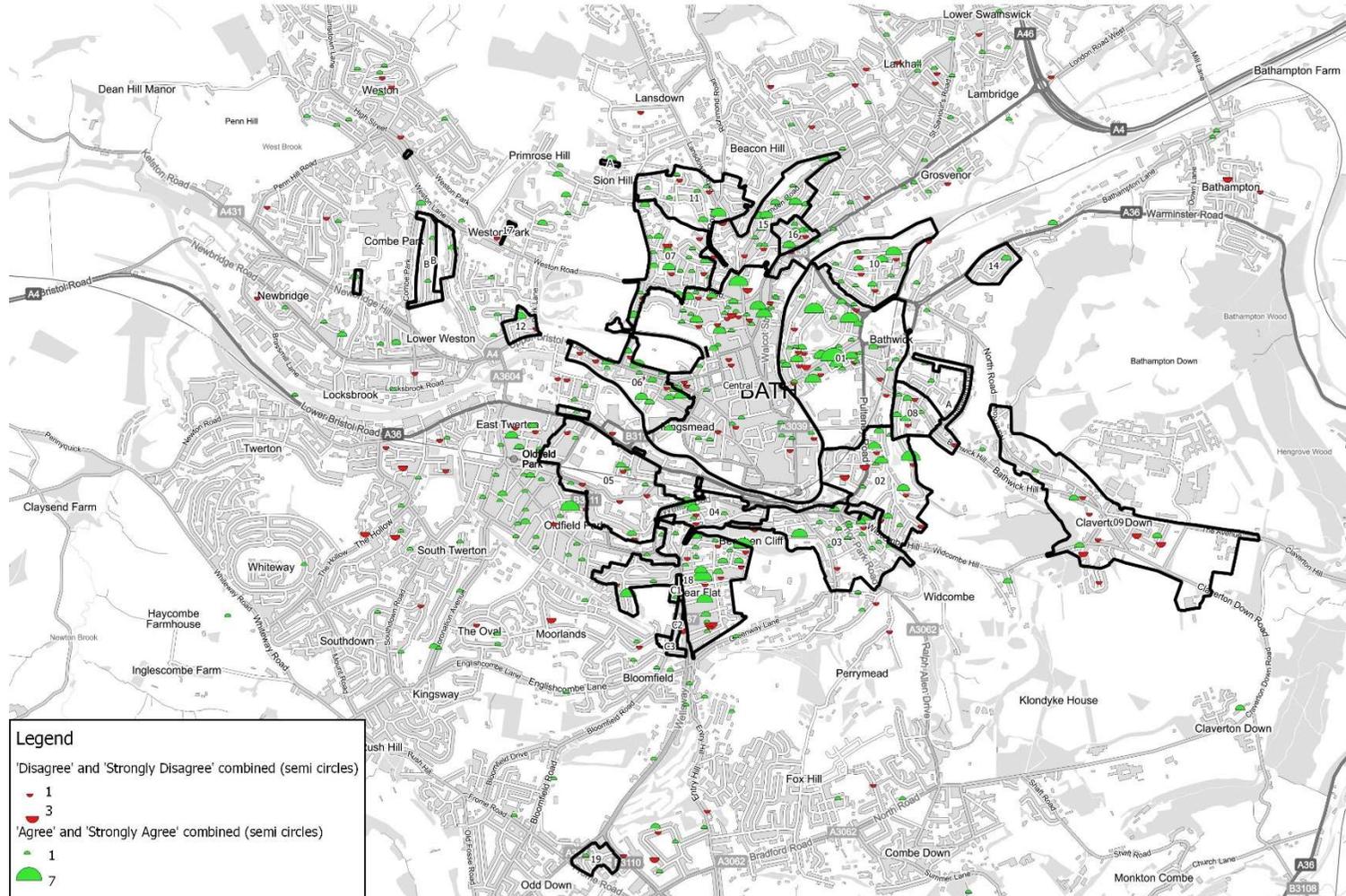


Figure 5-15: Councils have an important role in reducing air pollution postcode plot –Bath area

2021 Parking Consultation: Results by area (Bath, Residents' Parking Zones)
 It's necessary for vehicles to pollute less.

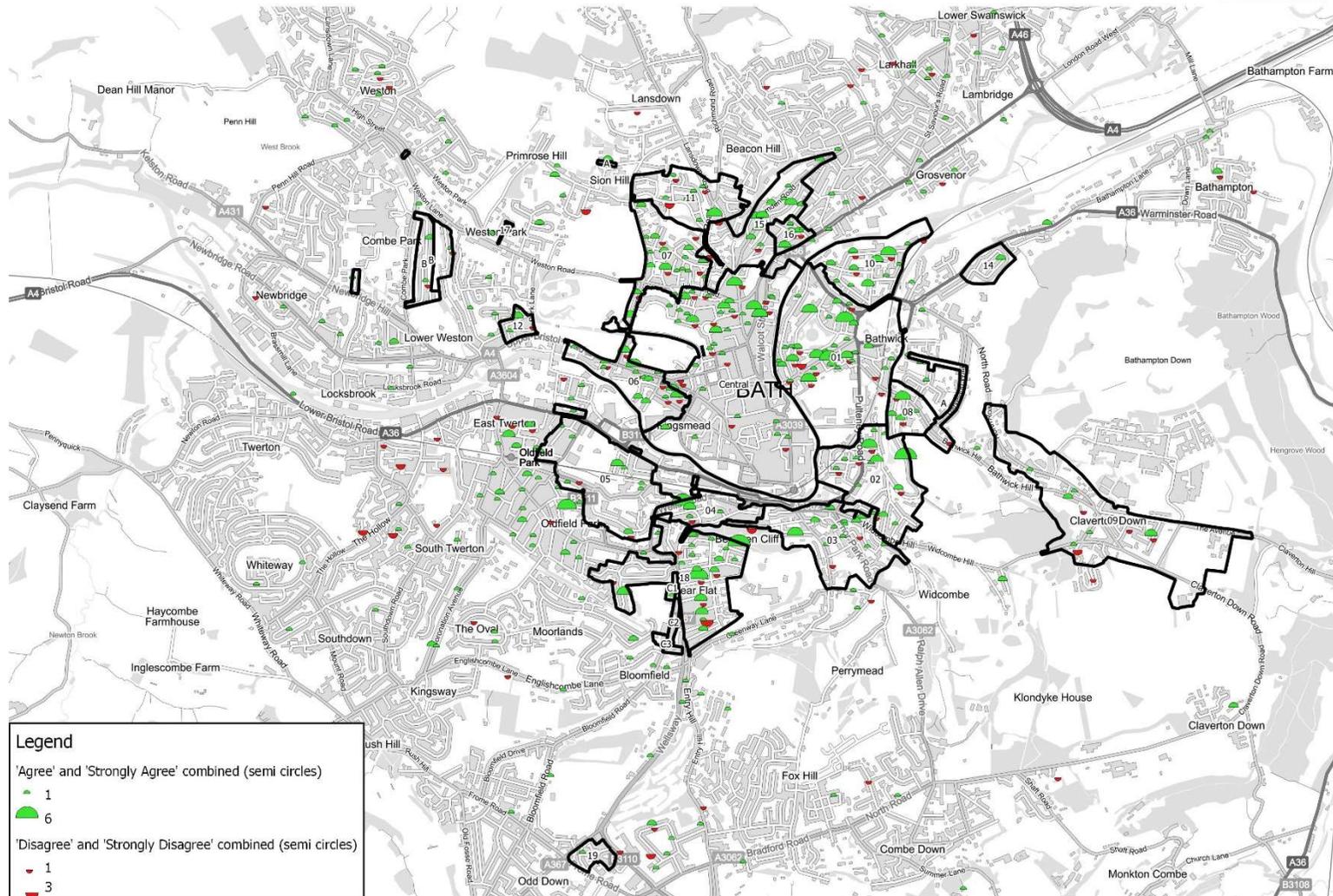


Figure 5-16: Vehicles should pollute less postcode plot –Bath area

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.

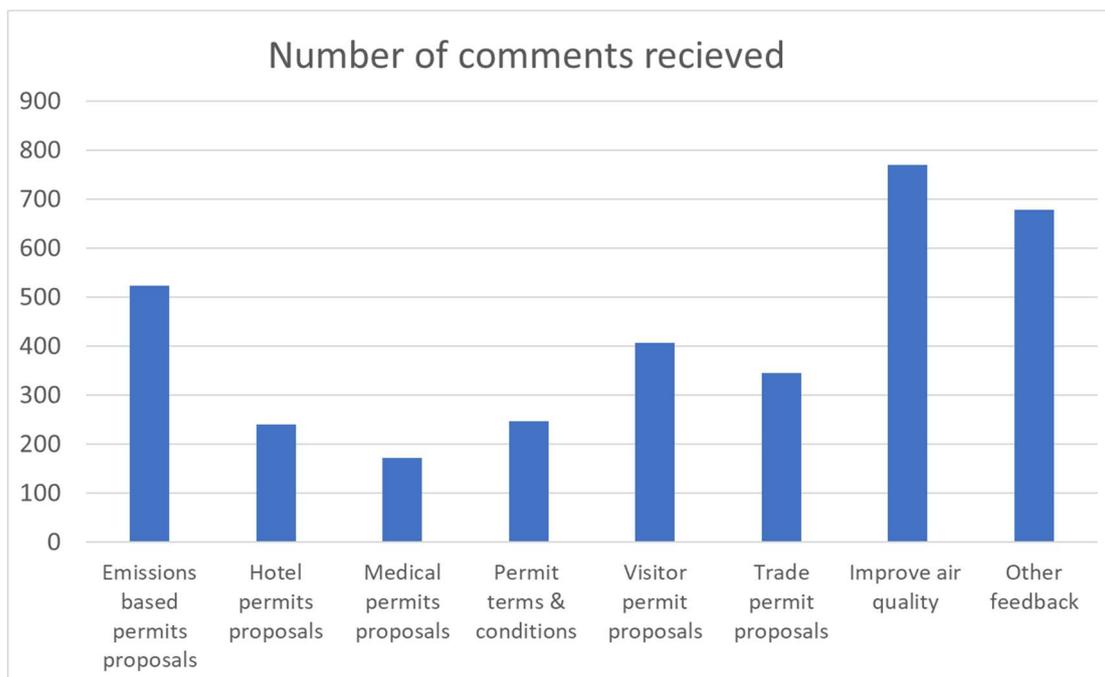


Figure 6-1: Number of individual comments from by respondents per question

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 nugaratory 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 NOx comparatively, they still emit higher levels of NOx 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 NOx 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 NOx 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 to 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 it's 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

- a. 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.
- b. 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
- c. 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).
- d. 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).
- e. Medical and care professionals will continue to be able to park close to patient's homes where parking spaces are available
- f. 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 permits 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

Parking Services
Highways & Transport
Bath & North East Somerset council

Email: Parking@bathnes.gov.uk

On-Street Parking Permits Terms and Conditions

MIPERMIT

Draft June 2021

Contents

1. Introduction	3
2. General terms and conditions.....	4
3. Residents on-street permits.....	7
4. Visitor permits.....	12
5. Trade permits.....	15
6. Business permits	17
7. Hotel permits	19
8. Medical permits and Social Care permits	22
9. GP permits.....	24
10. Zero emission vehicle – permit offer	26
11. Other historical permits.....	27
12. Offsetting parking permit entitlement against off-street parking spaces	27

1. Introduction

- 1.1.** As a Council we recognise the importance of responding to the climate and ecological emergency. To help reduce transport related emissions, improve air quality and general well-being for all, we encourage everyone to consider more active ways to travel through walking, cycling and the use of public transport where possible.

Parking Permits and Resident Parking Schemes play a part in supporting the Council's Liveable Neighbourhoods strategy. You can find out more about the Council's Low Traffic Neighbourhoods strategy, Residents Parking Schemes strategy and Electric Vehicle Charging strategy on our website at <https://beta.bathnes.gov.uk/liveable-neighbourhoods-consultation> .

- 1.2.** This document sets out the Terms and Conditions for the operation and use of On Street parking permits in Bath and North East Somerset Council.

Data Protection Information

The Council will process any personal information in accordance with the Data Protection Act 2018. This authority 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.

Personal data may be used to enforce the parking terms and conditions and where Bath & North East Somerset believes a contravention has occurred we are processing your information in order fulfil our legal obligations under the Traffic Management Act (2004). Your 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>

2. General terms and conditions

- 2.1.** These general terms and conditions apply to **all** on-street parking permits. Additional terms and conditions apply for each different type of permit.
- 2.2.** A vehicle deemed by an authorised council officer to be parked in contravention of a valid parking restriction without a valid permit, may be issued with a Penalty Charge Notice (PCN).
- 2.3.** Possession of a valid parking permit does not guarantee a parking space. A parking permit gives authorisation to park and is not itself 'paid for parking'.
- 2.4.** Parking is only permitted in a parking bay as authorised by the terms and conditions of issue outlined in the relevant section of this document.
- 2.5.** Vehicles must be parked wholly within the bay markings.
- 2.6.** A permit is only valid for the vehicle registration mark allocated to the permit. It is the permit account holder's responsibility to update the permit if the vehicle registration is changed. Alternative parking should be sought by the vehicle owner/keeper until the vehicle registration mark on the permit has been updated.
 - A.** If you have more than 1 vehicle linked to a digital permit account, it is your responsibility to ensure the correct vehicle is allocated to the permit.
- 2.7.** Where issued, all paper permits must be completed in ink or the relevant information scratched off the correct panels. Alterations to the details on a paper permit, failure to remove a required panel; or incorrect usage will automatically render it invalid.
- 2.8.** It is the permit holder's responsibility to renew a permit at expiry where an auto renewal is either not available or not chosen. No grace period is provided by the Council. A 'renewal reminder' email may be sent as a courtesy to a permit account holder where they have registered a valid email address against their account. Reliance on receipt of this reminder to renew an expiring permit is at the account holder's own risk.
- 2.9.** The council or Police may temporarily suspend the whole or part of a parking place. This will be indicated accordingly using authorised signage. Vehicles must not park in a suspended parking place without signed authorisation from a council Officer or Police Officer. Alternative parking locations will not be provided by the Council in lieu of parking places that are suspended from use.
- 2.10.** The maximum laden weight of a vehicle permitted to use a permit to park in a parking bay is 3.5 tonnes; the maximum vehicle length is 6 metres and a

maximum of 12 passenger seats. Permits can only be used with passenger vehicles; Car derived vans; and Goods vehicles with a taxation class of PLG.

- 2.11.** Information provided for a permit application may be subject to further verification. Parking Services can request evidence to verify information for a permit or for the purpose of undertaking compliance checks at any time for any permit type. Failure to provide information within 21 days of a request, or in the event of evidence of false or untrue information being provided, may lead to the cancellation of parking permits with no refund being provided.
- 2.12.** You are not permitted to lend or sell a parking permit to anyone (such as friends or commuters).
- 2.13.** New developments and new builds within existing residents' parking zones are not generally entitled to parking permits. This includes properties which may have been subject to a change in use, for example from business use to residential use and/or where planning permission may have been required. Prospective purchasers/tenants or residents/developers considering building alterations or new builds are strongly advised to contact Parking Services for advice regarding eligibility or implications for a Residents' Parking Permit, or any other type of permit.
Read our Policy for Allocation of Parking Permits in Controlled Zones at <https://www.bathnes.gov.uk/services/parking-and-travel/parking-permits/residents-parking-permits>
- 2.14.** Failure to apply for or use a permit in accordance with these terms and conditions may result in the refusal or cancellation of a parking permit.
- 2.15.** In the event of dispute concerning eligibility or use of a permit not in accordance with these terms and conditions, the decision made by the Head of Parking Services will be final.
- 2.16.** Under Section 15 of the Road Traffic Regulation Act 1984, as defined by the Road Traffic (Permitted Parking Area and Special Parking Area) (District Bath and North East Somerset), anyone who with the intent to deceive or misuse a parking permit in any way shall be guilty of a Criminal Offence. It is also an offence to knowingly make a false statement to obtain a parking permit.
- 2.17.** A Parking permit does not remove the requirement to tax and insure a motor vehicle for use on the public highway.
- 2.18.** Vehicles parked with a permit must be in a 'roadworthy' condition for the permit to be valid. A roadworthy condition means that all wheels are attached and that the vehicle, in the opinion of an authorised Council officer, is capable of being driven safely under its own power.

2.19. The Council reserves the right to make changes to these Terms and Conditions from time to time as appropriate, and this will be undertaken in accordance with the Council's decision-making process and powers of delegated authority.

3. Residents on-street permits

General

- 3.1.** Resident Parking Schemes operate across Bath & North East Somerset including areas of Bath, Keynsham and Peasedown St John.

You can find out which parking zone you live in by checking the maps on our Residents parking permits web page

<https://www.bathnes.gov.uk/services/parking-and-travel/parking-permits/residents-parking-permits>

- 3.2.** Resident Parking permits give priority to permit holders to park their own vehicles within a reasonable distance of their homes during the operational hours of the parking zone in which they reside. They do not guarantee a space and are not intended to solve all parking problems.
- 3.3.** Digital Resident Parking permits are available in durations of 1, 3, 6 months and 1 year through MiPermit <http://www.wanttopark.com/bathnes>.
- 3.4.** Monthly permits incur an additional surcharge of £0.62 per permit to cover additional costs incurred by the council. All other durations are charged pro rata.
- 3.5.** Proof of residency is required as part of the application process.
- 3.6.** Bath Residents' Permit holders can park in all on-street resident parking bays and dual use bays (resident parking/on-street pay and display bays) located within their zone.
- 3.7.** Keynsham Residents' Permit holders are permitted to park in on-street residents' parking bays in the zone (street) that their permit is valid for: Mayfields, Rock Road, or Labbotts.
- 3.8.** Peasedown St John Residents' Permit holders are permitted to park on Bath Road, Peasedown St John.
- 3.9.** Resident parking permits cannot be used to park in Pay & Display only parking bays or time limited waiting parking bays.
- 3.10.** Bath Central Zone and Zone 6 permit holders are permitted to park within Charlotte Street car park overnight between 5.30pm and 10am daily free of charge.
- 3.11.** The charge paid for a Residents Parking permit covers the membership, administration; maintenance and enforcement of permit schemes. We will not provide a refund if a permit is no longer required or unable to be used and

recommend residents consider short permit durations if this flexibility is required.

- 3.12.** We will transfer an existing permit to a newly purchased property address, subject to proof of residency and the property being eligible for a residents' parking permit.

Vehicle emissions-based permits

- 3.13.** Permit costs are based on a vehicles carbon dioxide (CO₂) emissions in line with the DVLA Vehicle Excise Duty (VED) classifications (bands match 1st April 2017 classification). Vehicles where there is no VED emissions rating available, including all vehicles registered before 2001, are charged at a standard level based on engine capacity, matching the approach to VED.
- 3.14.** You can check your vehicle's emissions rating or engine capacity free of charge online <https://www.gov.uk/get-vehicle-information-from-dvla>
- 3.15.** A 25% surcharge applies for diesel vehicles due to higher Nitrogen Dioxide (NO₂) emissions.
- 3.16.** Permits are only valid for the vehicle registration marks pre-registered when the permit is purchased via a MiPermit account. A maximum of 4 vehicles can be registered per permit at the point of purchase.
- A. If more than one vehicle is added to a permit, only 1 vehicle can be active and use the permit at a time. It is the account holder's responsibility to ensure the correct vehicle registration mark is active against the permit.
- 3.17.** The permit cost is based on the highest polluting vehicle preregistered to the permit at the time of purchase.
- 3.18.** If you have a change in vehicle and need to update your permit, you can only do this by contacting Parking Services either by email at parking@bathnes.gov.uk, or calling 01225 47 71 33. A £10 administration charge is payable for any vehicle registration mark changes that are accepted.
- A. If the new vehicle is in a higher emissions band than the vehicles already registered to the permit, the permit must be cancelled and a new permit purchased. This will be charged at the rate for the vehicle with the highest emissions classification. See the table of permit costs at 3.25. No refund will be provided. We therefore recommend the purchase of a short duration permit where a future vehicle change may be expected.

Eligibility

- 3.19.** You can apply as a resident if you live and sleep more than four nights a week at your property within a residents' parking zone.
- 3.20.** Permits are linked to the resident's property and are subject to proof of residence. You cannot have a resident's permit for more than one property or zone.
- 3.21.** Permits are for use by residents when using their own vehicle to park within the parking zone where they live.
- 3.22.** Vehicle used with the permit must be registered with the DVLA to the applicant's residential property address within a residents parking zone. The council reserves the right to request proof of the address the vehicle is registered to (the Vehicle Registration Document – V5C). This must be provided within 21 days of any request by Parking Services. Failure to provide information may lead to the permit being cancelled with no refund provided.

Zones, operational hours and permit entitlement

- 3.23.** Due to the limited availability of kerb space on street, residents parking permits are restricted to a maximum of 2 permits per property. In the Bath Central Zone and Peasedown St John zone, the maximum number of permits is one per property.
- 3.24.** Permit entitlement within new zones created from 2019 will be offset by the availability of any off-street parking at the property. For example, a property with access to 1 off street parking space will have its eligibility for parking permits reduced by 1. This condition will apply to any new approved residents' parking zones and may apply to other zones upon review. See section 12 for information on what constitutes an 'off-street parking space'.
- 3.25.** The operating hours and permit entitlement for each residents parking zone is shown in the Table 1 below.

Table 1: Permit entitlement and operational hours

Zone	Hours (Mon to Sun)	Maximum permit entitlement*
Bath		
Central Zone	8am to 7pm	1
Zone 1	8am to 7pm	2
Zones 2 to 14	8am to 6pm	2
Zones 15 to 16	8am to 7pm	2
Zones 17 to 19	8am to 6pm	2
Zones A, B and C	8am to 6pm	2
Keynsham		
Mayfields, Rock Road, Labbotts	8am to 6pm	2
Saltford		
Zone 20	8am to 7pm	2
Peasedown St John		
6, 7 and 8 Bath Road only	8am to 6pm	1

* permit offset to entitlement may apply – see section 12

Permit costs

3.26. Table 2 below shows the annual charges for emissions-based residents' parking permits.

3.27. 6 and 3 month permit durations are charges pro rata the annual charge.

Table 2: Emissions-based residents parking permits - annual cost

	Non-diesel vehicle permits		Diesel vehicle permits	
	1st	2nd	1st	2nd
VED band (g CO2 per km)				
0	£50	£80	£62.50	£100
1 to 50	£100	£160	£125	£200
51 to 75	£100	£160	£125	£200
76 to 90	£100	£160	£125	£200
91 to 100	£100	£160	£125	£200
101 to 110	£100	£160	£125	£200
111 to 130	£100	£160	£125	£200
131 to 150	£105	£168	£131.25	£210
151 to 170	£110	£176	£137.50	£220
171 to 190	£115	£184	£143.75	£230
191 to 225	£120	£192	£150	£240
226 to 255	£125	£200	£156.25	£250
Over 255	£130	£208	£162.50	£260
Pre-2001 engine capacity (cc)				
0 to 1555	£125	£200	£156.25	£250
1551 to 1950	£150	£240	£187.50	£300
1951 to 2950	£175	£280	£218.75	£350

Table 2: Emissions-based residents parking permits - annual cost

	Non-diesel vehicle permits		Diesel vehicle permits	
	1st	2nd	1st	2nd
Over 2950	£200	£320	£250	£400

3.28. Table 3 below shows the monthly charges for emissions-based residents' parking permits

3.29. Monthly costs include a small additional surcharge to cover the increase transaction charges.

Table 3: Emissions-based residents parking permits – monthly cost

	Non-diesel vehicle permits		Diesel vehicle permits	
	1st	2nd	1st	2nd
VED band (g CO2 per km)				
0	£4.78	£7.28	£5.82	£8.95
1 to 50	£8.95	£13.95	£11.03	£17.28
51 to 75	£8.95	£13.95	£11.03	£17.28
76 to 90	£8.95	£13.95	£11.03	£17.28
91 to 100	£8.95	£13.95	£11.03	£17.28
101 to 110	£8.95	£13.95	£11.03	£17.28
111 to 130	£8.95	£13.95	£11.03	£17.28
131 to 150	£9.37	£14.62	£11.55	£18.12
151 to 170	£9.78	£15.28	£12.07	£18.95
171 to 190	£10.20	£15.95	£12.60	£19.78
191 to 225	£10.62	£16.62	£13.12	£20.62
226 to 255	£11.03	£17.28	£13.64	£21.45
Over 255	£11.45	£17.95	£14.16	£22.28
Pre-2001 engine capacity (cc)				
0 to 1555	£11.03	£17.28	£13.64	£21.45
1551 to 1950	£13.12	£20.62	£16.24	£25.62
1951 to 2950	£15.20	£23.95	£18.85	£29.78
Over 2950	£17.28	£27.28	£21.45	£33.95

4. Visitor permits

General

- 4.1. We encourage visitors to use sustainable modes of transport such as public transport (including Park and Ride), walking and cycling to reduce vehicle emissions and improve air quality for all. However, we recognise that residents may wish for visitors to park a vehicle in the zone they are visiting.
- 4.2. We offer digital permits usable in hours via MiPermit and paper permits in some zones which cover a full or half day. Restrictions apply to the number and type of permits available in each zone per year.
- 4.3. A valid visitor permit allows the visitor to park their vehicle in all on-street residents' parking bays and dual use bays (resident parking/ on-street Pay and Display bays) within the zone of the permit holder, for the appropriate duration during the operational hours of the zone.
- 4.4. Digital visitor parking permits are available via MiPermit at <http://www.wanttopark.com/bathnes>. Digital visitor permits can be purchased in bundles of 100 hours and are valid for 1 year from the date of purchase. A resident cannot purchase more than 1000 hours (100 hours only in the central zone) of visitor permits in any one 12-month continuous period. This is to manage supply of the total visitor permits purchased, against the limited availability of permit spaces.
- 4.5. The charge paid for visitor parking permits covers the membership; administration; maintenance and enforcement of permit schemes. A permit is not paid for parking and a space is not guaranteed. We will not provide a refund if permits are no longer required or unable to be used.

Eligibility

- 4.6. Visitor permits are available to all residents that reside in Bath, Keynsham, and Salford Residential Parking Zones regardless of whether they own a vehicle themselves. Proof of residency must be provided to apply for and purchase permits. The Peasedown St John zone is not entitled to visitor permits
- 4.7. Paper visitor parking permits are available for some zones at our Bath One Stop Shop (3-4 Manvers Street, Bath, BA1 1JQ) or by contacting our Parking Services team. You can email parking@bathnes.gov.uk or call 01225 47 71 33. Full-day and half-day paper permits are available for eligible zones.
- 4.8. Paper visitor permits are not available in Bath's Central zone, or any new zones implemented from 2019 onwards, which includes zones 17 to 20.

4.9. We will consider, on a case-by-case basis, any applications for paper permits, to meet the needs of vulnerable residents in zones where paper permits are not normally available.

Digital permits

4.10. Digital visitor permits can be used 'by the hour' via MiPermit using the mobile app, website, or via text message. The minimum stay that you can log is 1 hour.

4.11. All purchased digital visitor permits will expire one year from the date of purchase if not used. No refund is provided.

4.12. A visitor parking stay must be activated via MiPermit for the required duration and this can be done up to 7 days in advance or immediately upon a guest's arrival. The stay can be activated as hours or days. An active visitor permit stay automatically ends at the end of the requested time period.

4.13. A stay booked in advance can be cancelled via MiPermit subject to the cancellation taking place before the stay was due to start. Your allowance will not be deducted.

4.14. It is the permit holder's responsibility to activate a 'further stay' if the guest wishes to stay longer. If no further stay is activated and the vehicle is issued with a PCN it is the owner/keeper of the illegally parked vehicle, and not the permit account holder, that will remain liable for the penalty charge.

Paper permits

4.15. One-day permits are available in batches of 10 and half -day permits are available in batches of 20. It is not possible to purchase mixed batches (e.g 10 half day and 5 full day), but residents can buy any combination of batches, up to their maximum entitlement. Permits expire one year from the date of purchase if not used. No refund will be provided.

4.16. All relevant panels must be 'scratched off' correctly from the relevant boxes on the permit, and any text boxes completed in ink for the permit to be valid. The vehicle registration mark of the visitor's vehicle must be written clearly in the relevant space on the permit. The permit must be clearly displayed in the windscreen of the vehicle, immediately upon arrival.

Permit entitlement & costs

4.17. The cost of visitor permits, and the maximum entitlement, are shown in Table 4 below. For properties with more than one household, such as HMOs, please note that permit entitlement is per property, not per household within the property. We will issue permits on a first-come, first-served basis, and recommend that different households within a property negotiate together, with the aim of sharing parking allocation fairly.

Table 4: Visitor permit annual entitlement and cost			
Zone	Permit entitlement	Cost	
Bath			
Central Zone	100 digital hours	£15	
Zones 1 to 16, A, B, C	1000 digital hours, purchased individually or in batches of 100 hours, in the form of: <ul style="list-style-type: none"> • 10 x one-day permits • 20 x half-day permits 	£15 per	100 hours 10 one-day permits 20 half-day permits
Zones 17 to 18	1000 digital hours	£15 per	100 hours
Keynsham			
Mayfields, Rock Road, Labbotts	1000 digital hours, purchased individually or in batches of 100 hours, in the form of: <ul style="list-style-type: none"> • 10 x one-day permits • 20 x half-day permits 	£15 per	100 hours 10 one-day permits 20 half-day permits
Saltford			
Zone 20	1000 digital hours	£15 per 100	hours
Peasedown St John			
No visitor permit entitlement			

5. Trade permits

General

- 5.1.** We encourage tradespeople & landlords to use sustainable modes of transport such as public transport, walking and cycling to reduce vehicle emissions and improve air quality for all. However, we recognise that there are occasions where it is necessary due to the nature of the service provided to park in a Bath car park, on street pay and display bay, or Residents' Parking Zone in order to provide services to residents and businesses.
- 5.2.** A trade permit allows the holder to activate digital parking stays to park in a council owned Bath car park, residents' parking bay, or on-street pay & display bay for as long as required, without having to purchase a ticket at a pay & display machine. This provides the flexibility of allowing the permit holder to stay for longer periods than the maximum time advertised.
- 5.3.** You can apply for a digital trade permit through [MiPermit](#).
- 5.4.** A trade parking stay must be activated via [MiPermit](#) in advance, or upon arrival for the required duration.
- 5.5.** A stay can be cancelled via the [MiPermit](#) mobile app, if booked in advance, and if done so before the requested time starts. A parking stay cannot be cancelled once it has started.
- 5.6.** It is the permit holder's responsibility to activate a 'further stay' if you wish to stay longer than the activated parking stay. Failure to do so may result in the issue of PCN.
- 5.7.** Trade permits are not vehicle specific. There is no limit to the number of vehicles that can be linked to a trade permit account. All parking charges incurred on the account are charged against the registered bank card on a daily basis.

Eligibility

- 5.8.** Tradespeople using a vehicle as an essential on-site base while working with heavy materials, equipment and tools, and landlords who rent at least one property within a residents' parking zone are eligible for a trade permit.
- 5.9.** Applicants do not have to reside or be based within Bath & North East Somerset to apply.
- 5.10.** All applications are considered on a case-by-case basis. Examples of trades that may be entitled include (but are not limited to) services which may need to deliver heavy equipment and tools, such as the following:
 - Aerial installation

- Bathroom fitting
- Building
- Carpentry
- Carpet fitting
- Painting & Decorating

5.11. Applicants are required to provide proof of the business undertaken as part of the application process.

[Location codes and costs per stay](#)

5.12. Table 5 below shows the current trade permit location codes and costs per stay.

Table 5: Trade permit location codes and cost			
Trade area	Residents' parking zone	Location code	Cost
Inner zones	Bath Central and Zone 1	755999	£3.50 per hr up to £28 daily maximum
Outer zones	All other residents' parking zones	755998	£7 per day
Bath council car parks	n/a	Location codes and car park charges as per individual signs and Pay & Display machines	

6. Business permits

General

- 6.1.** We encourage business owners and their visitors to use sustainable modes of transport such as public transport, walking, and cycling, to reduce vehicle emissions and improve air quality for all. We recognise that there are occasions where it is necessary for a business to use a vehicle to undertake its services or enable visitors to park close to its premises.
- 6.2.** Business permit holders can park in all on-street resident parking bays within the zone where the business is located.
- 6.3.** A business permit **must not** be used for staff or owner parking, as a form of commuter parking.
- 6.4.** If you have a change in vehicle, your permit must be updated and proof of business vehicle insurance provided. This can only be done by contacting Parking Services. Email parking@bathnes.gov.uk or call **01225 47 71 33**. There is a £10 administration charge for transferring your permit to the new vehicle.
- 6.5.** The charge paid for a business parking permit covers the membership, administration, maintenance, and enforcement of permit schemes, it does not represent paid for parking and does not guarantee a parking space. We will not provide a refund if a permit is no longer required or unable to be used.
- 6.6.** There are two types of permit:
 - A. Business Vehicle permit**
 - i. A business vehicle permit is for use with a vehicle required by the business for its day-to-day operations, for example to undertake customer deliveries. This can be a passenger vehicle, car-derived van or goods vehicle. A business vehicle permit is vehicle specific and can only be used for the nominated vehicle.
 - ii. You will need to provide evidence that the vehicle is registered to the business as the registered owner or keeper (V5 documents). If the vehicle is not registered to the business, you will need to supply evidence that it is insured for business use.
 - iii. Digital business vehicle permits are available on an annual or six-monthly, basis through MiPermit.
 - iv. Upon application and once approved, you will be able to purchase a permit. Permits are virtual meaning there is nothing to display in the vehicle and there is no need to activate a parking stay when using this permit.
 - B. Business Visitor permit**
 - i. A business visitor permit can be used by the permit holder to activate a parking stay for a visitor to the business when using a passenger vehicle, car derived van or goods vehicle. A business visitor permit is not vehicle specific.

- ii. Upon application and approval, you will be able to purchase a permit and activate a parking stay for visitors through a Permit On Demand (POD) account in MiPermit. It is the permit holder's responsibility to activate a parking stay upon each visitor's arrival in order for the permit to be valid. See our website for details

Eligibility & entitlement

- 6.7.** The owner of a business located in a Resident Parking Zone, with the exception of businesses in Central Zone, can apply for a Business Vehicle permit or Business Visitor permit. A business is entitled to a maximum of 2 permits in any combination.
- 6.8.** Eligibility for either permit will be offset by the availability of any off-street parking at the business property. For example, a property with access to 1 off street parking space will have its eligibility for parking permits reduced by 1. You can read more about what constitutes an off-street parking place in section 12.
- 6.9.** The business must be registered for Business Rates (NNDR).

Permit costs

- 6.10.** The business must be registered for Business Rates (NNDR).
- 6.11.** Costs are outlined in Table 6, below.

Table 6: Business permit costs		
Permit	12-month cost	6-month cost
1st	£110	£55
2nd	£165	£82.50
Total for 2 permits	£275	£137.50

7. Hotel permits

General

- 7.1. We encourage all visitors to use sustainable modes of transport such as public transport to reduce vehicle emissions and improve air quality for all. However, we recognise that hotel, holiday let, and guest house permit holders may wish to continue to offer parking to their guests as part of their package when staying at the establishment.
- 7.2. Hotel permits now include all permits previously called Hotel, Holiday Let or Guest House permits.
- 7.3. Only businesses with an existing Hotel, Holiday Let or Guest House permit on 20th July 2021 are entitled to purchase the new Hotel permits.
- 7.4. Hotel permits are only available digitally via our MiPermit service. Permit holders are able to activate parking stays for guests on their behalf using MiPermit.
- 7.5. Hotel permits now operate within an Inner and an Outer permit zone, with permits able to be used differently within each zone. The distribution of these zones against current RPZ boundaries has been based on the distribution of properties which have Hotel permits and an analysis of permit demand in June 2021.

A. **Hotel Inner Zone (Bath Central, Zone 1 & Zone 6)**

- i. Permits are only valid in council long stay car parks where parking of more than 4 hours is available, subject to the availability of spaces. They do not provide reserved parking in specific bays.
- ii. Guests who hold a valid Blue Badge may park in on-street resident parking bays and dual use bays (resident/on-street pay & display bays) within the Inner Hotel Zone when staying at properties within this area with a valid Hotel permit AND where they display their Blue Badge. Blue Badge holders may also use their Hotel permit to park in a council long stay car park.

B. **Hotel Outer Zone (all other resident parking zones)**

- i. Guests issued with a Hotel permit in these zones may park in on street residents permit bays and dual use bays (resident/on-street pay & display bays) in the zone the establishment is located.

- 7.6. Parking stays are valid for 24 hours and start from noon on the activation date and end at noon the following day. It is possible to activate stays lasting multiple days.

- 7.7.** When parking at a council car park with a valid hotel permit, guests must comply with the terms and conditions for parking as advertised in the car park, for example, not parking in reserved bays, or out of a bay. Failure to comply may result in the issue of a PCN
- 7.8.** Activating a parking permit stay does not guarantee a parking space at a Long stay car park or entitle the permit user to park in a reserved bay.
- 7.9.** A Hotel parking permit is not valid at any private car park or council short stay car park.
- 7.10.** Upon application and once approved, you will be able to activate parking stays for visitors through a Permit On Demand (POD) account in MiPermit. It is the permit holder's responsibility to activate a parking stay upon the guest's arrival, in order for the permit to be valid.
- 7.11.** Parking stays can be activated in advance, for example, at the time of the guests' reservation or booking. A parking stay can be cancelled if done so before the hotel permit stay has started and there will be no charge.

Eligibility & Entitlement

- 7.12.** Only the owner or business manager of a hotel, guest house or holiday let that had a qualifying permit as at 20 July 2021 (Paragraph 7.3) and is located within a Residential Parking Zone, may apply for a hotel permit account
- 7.13.** The number of simultaneous stays that can be active at any one time (previously the number of permits) for Hotels remains linked to a property's number of discrete rooms, up to a maximum of 15. This number is also offset by the availability of off-street parking (or historic parking where this has been surrendered to development).
- 7.14.** Holiday Let/Guest House entitlement remains at 1 permit per property. This number is also offset by the availability of off-street parking (or historic parking where this has been surrendered to development).
- 7.15.** The business must be registered for Business Rates

Cost of parking stays

- 7.16.** All Hotel permit parking stays are charged at the 24-hour parking rate at a long stay car park. Current charges (June 2021) are £15 per day.
- 7.17.** Multiple day stays are charged at the equivalent multiples of the daily rate. No discount is available for longer stays.

- 7.18.** No reduction or refund is provided for any part days not required within an activated stay.
- 7.19.** No refund will be provided for an activated parking stay in the event a parking space is not available at any of our long stay car parks.
- 7.20.** All parking charges incurred on the account are charged against the registered bank card on a daily basis.

8. Medical permits and Social Care permits

General

- 8.1. We encourage all medical and social care staff to use sustainable modes of transport such as public transport, walking and cycling, to reduce vehicle emissions and improve air quality for all. We recognise that medical and social care workers may require a vehicle to provide essential health and personal care services to people living at home within a residents parking zone.
- 8.2. Digital medical and social care permits are available via our MiPermit service.
- 8.3. Upon application and once approved, it is the applicant's responsibility to log in to their account and to purchase the permit. You do not need to reapply each year, simply log into your account and renew your permit when it expires.
- 8.4. Once a valid permit has been purchased the permit holder will then be able to activate a free parking stay upon arrival at a destination for the permit to be valid.
- 8.5. Medical and social care permits allow permit holders to park in a resident's parking bay or dual use bays (residents/pay & display bay), within any residents parking zone, for up to 2 hours when visiting patients or service users at their homes.
- 8.6. Free parking stays are limited to 2 hours. If a visit takes longer than 2 hours, or if a number of visits are taking place in the same area, additional parking stays must be activated at the expiry of each 2hr period. There is no limit to the number of concurrent stays that can be activated.
- 8.7. If you are issued with a PCN, it is the responsibility of the recipient of the PCN to either pay the penalty charge or to submit a challenge the PCN. Details of both are provided on the reverse of the PCN on our website.
- 8.8. Permits cannot be used in the following places:
 - council car parks,
 - Where there is a loading ban,
 - A marked cycle lane,
 - Sections of a road with any marking associated with a pedestrian crossing,
 - Where obstruction or danger will be caused,
 - A Blue Badge Holders only bay,
 - A clearway/bus stop/taxi rank.
- 8.9. Medical and social care parking permits are designed to allow **home visits** to patients in the course of work and **must not be used to provide daily or commuter parking** on public roads with parking controls. This means permits should not be used when parking near a place of work, such as a surgery or

medical practice, even when attending patients at a medical practice; before going on a visit or when returning to work after a visit. Vehicles observed in close proximity to the user's regular surgery or medical practice may be issued with a PCN and the permit may be cancelled.

8.10. Permits are not vehicle specific, meaning a number of vehicles can be registered as eligible to use a permit. However, **only one vehicle can actively use the permit at a time**. If your medical practice requires two or more staff to perform house calls at the same time, you will need to buy more permits for their use.

8.11. It is the applicant's responsibility to ensure that all permit users who have their vehicle linked to a permit account are aware of the terms and conditions of permit use.

8.12. We are unable to provide refunds for permits that are no longer required.

Eligibility

8.13. Medical permits - These permits are available to medical professionals providing essential medical services to patients at their home within a Residents' Parking Zone. All applications are considered on a case-by-case basis. Examples of those eligible include (but are not limited to) the following:

- Doctors (please note there is a separate parking permit scheme for GP's)
- District nurses
- Midwives
- Occupational therapists

8.14. Social care permits - **These** are available to social care professionals providing personal care to residents at the resident's home within a Residents' Parking Zone. All applications are considered on a case-by-case basis. Examples of those eligible include (but are not limited to) the following:

- Home care assistants
- Community support and outreach workers

8.15. Applicants do not have to reside or be based within Bath & North East Somerset to apply.

Permit costs

8.16. The cost of a permit is £100 per year in line with the baseline cost of a resident's permit.

9. GP permits

General

- 9.1.** We encourage the use of sustainable modes of transport such as public transport, walking and cycling to reduce vehicle emissions and improve air quality for all. However, we recognise that GP's will require a vehicle when on call so they can respond to medical emergencies.
- 9.2.** GP permits are for medical visits and to facilitate parking close to a place of work when on call to enable a prompt response in an emergency. They must not be used for general or commuter parking.
- 9.3.** Digital GP permits are available via our MiPermit service.
- 9.4.** When on call, or when responding to medical emergencies at someone's home, GP Permit holders can park in the following places:
- Doctors only bays
 - Resident's only parking bays
 - Pay & Display bays
 - Limited waiting bays (without time limit)
- 9.5.** Permits cannot be used in the following locations or circumstances:
- Council car parks
 - Where there is a loading ban
 - A marked cycle lane
 - On a part of the road with any markings associated with a pedestrian crossing
 - Where obstruction or danger will be caused
 - Blue Badge Holders only bay
 - A clearway/bus stop/taxi rank
 - On a no waiting or yellow line restriction (unless attending an emergency)
- 9.6.** If attending an emergency and no other legal parking space is available, the permit holder can park on a no waiting/yellow line restriction. If a PCN (Penalty Charge Notice) is issued, it is the PCN recipient's responsibility to either pay the charge or submit a challenge through the statutory process as advised on the reverse of the PCN and on our website at <http://new-banes-website-dev/challenging-parking-fine>.
- 9.7.** Permits are vehicle specific and can **only be used by the GP named in the application using their nominated vehicle(s)**. A maximum of 2 vehicles can be associated to a permit.

9.8. If a vehicle change is required, the current permit must be updated and proof of business vehicle insurance provided. This can only be done by contacting the Parking Services team via email parking@bathnes.gov.uk or on 01225 47 71 33. There is a £10 administration charge for updating your permit.

9.9. We are unable to provide refunds for permits that are no longer required.

Eligibility

9.10. GP Permits are available to registered general practitioners who are required to be on call to respond to medical emergencies. Evidence of registration; or the GP's full name and GMC reference number must be provided with the application.

9.11. Applicants do not have to reside within Bath & North East Somerset to apply.

9.12. Permit users must have business level insurance for the vehicle(s) linked to the permit.

Permit costs

9.13. The cost of a permit is £100 per year in line with the baseline cost of a residents permit

10. Zero emission vehicle – permit offer

- 10.1.** In support of our aims to improve air quality and promote the use of zero emission vehicles, we are offering a limited number of some of our permits, for permit users with a zero emissions vehicle.
- 10.2.** This discount is offered on a first-come first-served basis until March 2022 as part of a trial funded by government grant in support of the Clean Air Zone
- 10.3.** If the vehicle is eligible for a discounted permit at the time of application, you will be given the option to select this offer at the point of purchase.
- 10.4.** If you accept the discount option, you will not be permitted to change the vehicle registered against the permit.
- 10.5.** If you need a parking permit for use with more than one vehicle, you must purchase a standard permit at the relevant permit cost.
- 10.6.** Costs of permits where the zero emission discount is available are outlined in Table 7 below

Table 7: Zero Emissions permit discount		
Permit type	Normal cost	Zero emission offer
Emissions based Residents' Permit		
1st permit	£50 to £200	£10
2nd permit	£80 to £320	£10
Business Permit		
1st permit	£110	£10
2nd permit	£165	£10
Medical Permit	£100	£10
GP Permit	£100	£10
Car park permit	various	50%

11. Other historical permits

- 11.1.** Other On street permit types not listed in this terms and conditions that remain in circulation 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.
- 11.2.** Where renewal of the permit is agreed, the council will by default look to renew as a digital permit within MiPermit.
- 11.3.** Charges for the renewal of these permits will be in line with the baseline charge for a resident permit at £100 per year.

12. Offsetting parking permit entitlement against off-street parking spaces

- 12.1.** Eligibility for Business permits and Resident parking permits within all zones implemented after 2019 will be offset by the availability of any off-street parking at the property. If there is space to park your vehicle on your property, then we will reduce the number of on-street permits you can purchase.
- 12.2.** An off-street parking space is defined as any of the following:
- i. Private parking within the curtilage (inside the boundaries) of the property
 - ii. Garages or other private off-street space, such as a driveway within a 200m walking distance.
- 12.3.** For the purposes of an off-street parking space, a garage is defined as a building designed to accommodate a parked motor vehicle and with a minimum internal dimension of 5m long and 2.5m wide (wall to wall). Any multiples of this space will count as multiple parking spaces. Any garage that measures smaller than the minimum dimensions will not be classed as an off-street parking place.
- 12.4.** A driveway is defined as an area of hardstanding (concrete or similar surface) accessible from the road and designed to accommodate a parked motor vehicle, with minimum dimensions of 5m long and 2.5m wide. Any multiples of this space will count as multiple parking spaces. Any driveway that measures smaller than the minimum dimensions will not be classed as an off-street parking space.
- 12.5.** The council's 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>

12.6. 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.

Appendix 03 – Summary of themes identified from first stage consultation

Themes are listed in alphabetical order and no weighting is inferred based on this ranking

Emissions based residents permits	Hotel permit review	Medical permit review	New terms & conditions	Trade permits charges	Visitor permit charges	Will proposals improve air quality	Other comments
Administration & enforcement	Accessibility	Confidentiality	Administration & enforcement	Air quality	Accessibility	Air quality	Accessibility
Air quality	Air pollution and congestion	Cost	Air quality	Cost	Air quality	Clean Air Zone	Air Quality
Clean Air Zone	Business impact & cost	Impact on visit/service	Costs	Enforcement	Cost	Costs	Costs
Cost	Misuse	Provision of permit	Off street parking	Public Transport	On street parking	Electric vehicles	Electric vehicles
Council intrusion	Parking		On street parking	Residential parking	Public Transport	Enforcement	Emissions based permits
Electric vehicle	Public Transport		Sunday charges	Shops		On street parking	Enforcement
Equalities impact and accessibility	Residents					Public Transport & sustainable travel	Hotel permit review
Incentives	Tourism						Medical permit review
Legality							On street parking
Off street parking							Public Transport & sustainable travel
Public Transport & sustainable travel							Vehicle/behaviour change and choice
Students							Visitor permit charges review
Vehicle/behaviour change and choice							

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Appendix 4 – Emissions based parking permits prices for residents parking zones

current permit price (Baseline)	
1st	£ 100.00
2nd	£ 160.00

The highlighted band in the table above identifies the upper Vehicle Excise Duty (VED) band where the baseline price applies. All VED bands up to and including this comprise 44% of all vehicles with a residents permit.

		Non diesel Permit cost (annual permit)			Diesel vehicles supplement (annual permit)		Diesel vehicles total permit cost (annual permit)	
		multiplier (against baseline price)	1st	2nd	supplement - 1st	supplement - 2nd	supplement + Permit - 1st	supplement + Permit - 2nd
CO2 emissions (g/km)	0	50%	£ 50.00	£ 80.00	£ 12.50	£ 20.00	£ 62.50	£ 100.00
	1-50	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	51 - 75	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	76 - 90	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	91 - 100	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	101 - 110	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	111 - 130	100%	£ 100.00	£ 160.00	£ 25.00	£ 40.00	£ 125.00	£ 200.00
	131 - 150	105%	£ 105.00	£ 168.00	£ 26.25	£ 42.00	£ 131.25	£ 210.00
	151 - 170	110%	£ 110.00	£ 176.00	£ 27.50	£ 44.00	£ 137.50	£ 220.00
	171 - 190	115%	£ 115.00	£ 184.00	£ 28.75	£ 46.00	£ 143.75	£ 230.00
	191 - 225	120%	£ 120.00	£ 192.00	£ 30.00	£ 48.00	£ 150.00	£ 240.00
	226 - 255	125%	£ 125.00	£ 200.00	£ 31.25	£ 50.00	£ 156.25	£ 250.00
Over 255	130%	£ 130.00	£ 208.00	£ 32.50	£ 52.00	£ 162.50	£ 260.00	
Engine capacity (pre 2001 registration)	0-1550	125%	£ 125.00	£ 200.00	£ 31.25	£ 50.00	£ 156.25	£ 250.00
	1550-1950	150%	£ 150.00	£ 240.00	£ 37.50	£ 60.00	£ 187.50	£ 300.00
	1951-2950	175%	£ 175.00	£ 280.00	£ 43.75	£ 70.00	£ 218.75	£ 350.00
	Over 2951	200%	£ 200.00	£ 320.00	£ 50.00	£ 80.00	£ 250.00	£ 400.00

Figure 1: Annual charge

		Non diesel Permit cost (annual permit)		Diesel vehicles total permit cost (Annual permit)	
		1st	2nd	supplement + Permit - 1st	supplement + Permit - 2nd
CO2 emissions (g/km)	0	£ 4.79	£ 7.29	£ 5.83	£ 8.95
	1-50	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	51 - 75	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	76 - 90	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	91 - 100	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	101 - 110	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	111 - 130	£ 8.95	£ 13.95	£ 11.04	£ 17.29
	131 - 150	£ 9.37	£ 14.62	£ 11.56	£ 18.12
	151 - 170	£ 9.79	£ 15.29	£ 12.08	£ 18.95
	171 - 190	£ 10.20	£ 15.95	£ 12.60	£ 19.79
	191 - 225	£ 10.62	£ 16.62	£ 13.12	£ 20.62
	226 - 255	£ 11.04	£ 17.29	£ 13.64	£ 21.45
	Over 255	£ 11.45	£ 17.95	£ 14.16	£ 22.29
Engine capacity (pre 2001 registration)	0-1550	£ 11.04	£ 17.29	£ 13.64	£ 21.45
	1550-1950	£ 13.12	£ 20.62	£ 16.25	£ 25.62
	1951-2950	£ 15.20	£ 23.95	£ 18.85	£ 29.79
	Over 2951	£ 17.29	£ 27.29	£ 21.45	£ 33.95

Figure 2: Monthly Charge

The monthly permit charge is equivalent to the annual charge pro rata, with £0.62 added to all bands to cover increased transaction costs incurred.

Appendix 5 – Distribution of Hotel and Holiday Let/Guest House permits in Bath, June 2021.

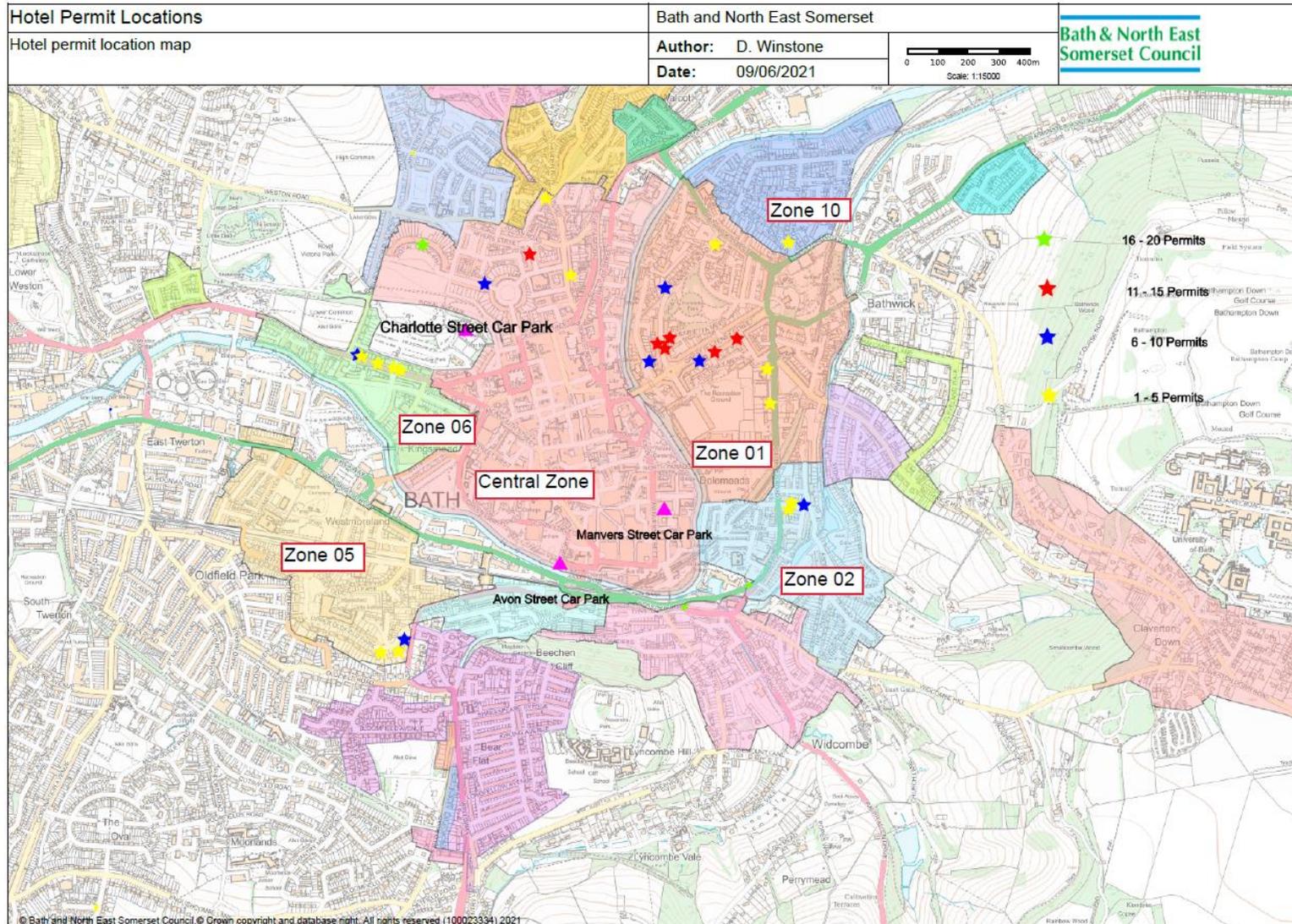


Figure -1: Hotel Permit distribution across RPZs

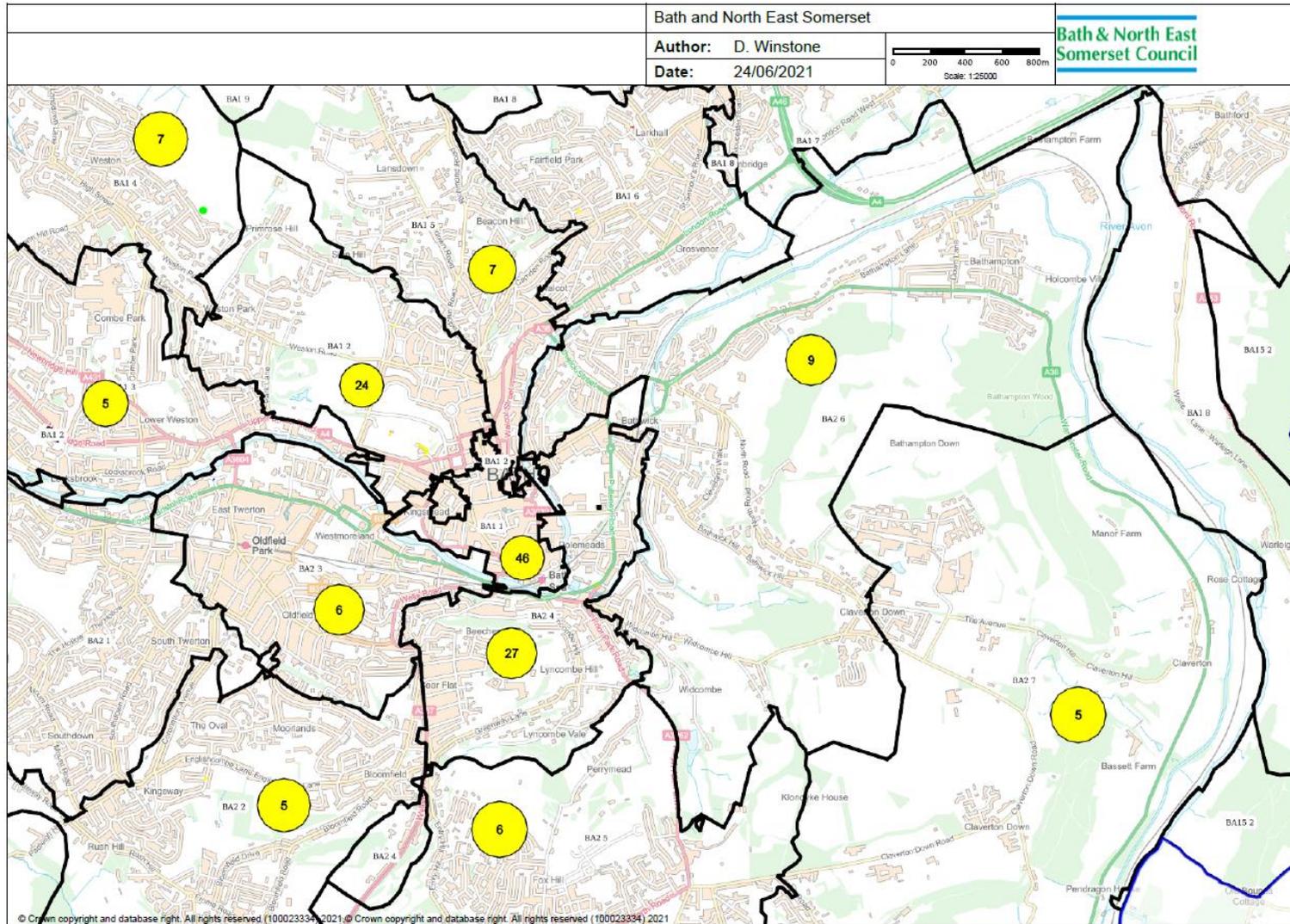


Figure-2: Holiday Let/Guest House permit distribution across Bath by postcode area

NB 194 Holiday Let/Guest Houses are issued as 24/06/2021. Only 65 are not plotted on this map as records do not include a postcode, or the postcode held is that of the permit account holder (owner or manager of the property) and not the qualifying address within an RPZ.

Appendix 6 – Analysis of permit/space demand by RPZ in Bath

Zone	Total Spaces (Est - based on 5m kerb per space)	Residents Permits	2 nd Residents Permits	% Permit Holders with 2nd Permit	Business Permits	Total	Parking Demand and Pressure (Permits issued / Spaces available)	Residential Properties	Commercial Properties	Total	% Res Properties with at least 1 Permit	% Properties with a 2nd Permit	Potential demand - (Nb 2nd permit take up assumed at 50%, this doesn't account for visitor permits, business permit demand or ineligible properties)
Central Zone	989	1344	0	0.00%	158	1502	151.87%	2912	2298	5210	46.15%	0.00%	294.44%
Zone 1	568	609	131	21.51%	209	949	167.08%	1673	340	2013	36.40%	7.83%	441.81%
Zone 2	470	279	70	25.09%	32	381	81.06%	537	56	593	51.96%	13.04%	171.38%
Zone 3	564	278	61	21.94%	20	359	63.65%	556	109	665	50.00%	10.97%	147.87%
Zone 4	234	154	33	21.43%	5	192	82.05%	297	39	336	51.85%	11.11%	190.38%
Zone 5	584	301	78	25.91%	24	403	69.01%	631	164	795	47.70%	12.36%	162.07%
Zone 6	338	286	49	17.13%	73	408	120.71%	700	125	825	40.86%	7.00%	310.65%
Zone 7	695	542	151	27.86%	44	737	106.04%	853	152	1005	63.54%	17.70%	184.10%
Zone 8	278	96	37	38.54%	33	166	59.71%	147	8	155	65.31%	25.17%	79.32%
Zone 9	386	47	14	29.79%	0	61	15.80%	231	6	237	20.35%	6.06%	89.77%
Zone 10	699	193	68	35.23%	4	265	37.91%	410	4	414	47.07%	16.59%	87.98%
Zone 11	388	190	69	36.32%	0	259	66.75%	188	59	247	101.06%	36.70%	72.68%
Zone 12	150	96	24	25.00%	4	124	82.67%	132	13	145	72.73%	18.18%	132.00%
Zone 14	211	21	2	9.52%	0	23	10.90%	75	0	75	28.00%	2.67%	53.32%
Zone 15	279	299	79	26.42%	6	384	137.63%	530	0	530	56.42%	14.91%	284.95%
Zone 16	110	115	17	14.78%	9	141	128.18%	273	0	273	42.12%	6.23%	372.27%
Zone 17	29	5	2	40.00%	0	7	24.14%	34	0	34	14.71%	5.88%	175.86%
Zone 18	941	537	156	29.05%	13	706	75.03%	943	17	960	56.95%	16.54%	150.32%
Zone 19	53	2	0	0.00%	0	2	3.77%	122	0	122	1.64%	0.00%	345.28%
Zone A	115	28	6	21.43%	0	34	29.57%	81	0	81	34.57%	7.41%	105.65%
Zone B	121	42	9	21.43%	0	51	42.15%	141	0	141	29.79%	6.38%	174.79%
Zone C	80	40	11	27.50%	0	51	63.75%	112	9	121	35.71%	9.82%	210.00%
Crown Hill	5	0	0	0.00%	0	0	0.00%	0	4	4	0.00%	0.00%	0.00%
Average				24.57%			70.41%				45.22%	12.03%	184.21%

- Notes:**
- Residents permits: Mi-Permit - virtual permit overview/month end @ 23:59
 - Business Permits: CaseManager - Report 0409 (Active permits by Zone)/Group=List/Zone=All/Date=Active at point in time/Export=Excel
 - Data is based on bays only during controlled hours and does not factor in availability of Single Yellow Line parking after the end of controlled hours
 - Total spaces: Estimate based on 5m kerb per space
 - Business Permits: Include Hotel/Guest House, Holiday Let & Travel Plan Permits
 - Parking Demand & Pressure: Permits issued divided by spaces available
 - % of Residential Properties with at least 1 permit held
 - % of Residential Properties with a 2nd permit held
 - Potential Demand: Assumes 2nd permit take up at 40%. Visitor permits, Business Permits or ineligible properties are not accounted for
 - Includes Zone 11 expansion - Sept 2017

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Equality Impact Assessment / Equality Analysis

Title of service or policy	Residents parking - Emissions based permits and visitor parking
Name of directorate and service	Place - Environmental Services - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager - Parking
Date of assessment	24 June 2021

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>Emissions based parking permits for all residents parking zones will facilitate the achievement of the strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods. It will also improve air quality by ensuring NO2 targets are met in the shortest possible time through a major shift to mass transport, walking and cycling 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.</p> <p>This new pricing policy is based on vehicle CO2 emissions as per vehicle Excise Duty (VED) classification (aligned to April 2017) with an additional diesel supplement to help achieve NO2 targets in the shortest possible time. Prices for the more polluting vehicles are set higher based proportionately on their emissions.</p> <p>Visitor permits are available to residents living in all residents parking zones in digital and paper formats and allow visitors to park on street in permit zones. Paper permits are only valid by the full day, and to support vulnerable residents unable to use digital permits, which can be used by the hour, a half day paper permit will be introduced.</p>

		The daily pro rata cost of visitor permits will increase by £0.50 per day in year 1, then a further £0.25 a day in years 2 and 3.
1.2	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>This is a review of existing residents parking zone permit pricing policy, with permits issued in line with the Traffic Management Act 2004 to allow enforcement of its residents parking zones.</p> <p>This review is only concerned with the provision of resident parking permits and how the changes affect their use. Entitlement to a permit or the physical layout of resident parking zones and the different types of restrictions they may contain are not within scope.</p> <p>In 2017 the Council was directed to Produce a Clean Air Plan to achieve compliance with European Limit Values in the shortest possible time, or by 2021 at the latest. There is room for review</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	This Policy is in line with Transport Policies and the Parking Strategy. It is consistent with (although is not designed to promote) the objectives of the Climate Emergency and Clean Air
2. Consideration of available data, research and information		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> ● Demographic data and other statistics, including census findings ● Recent research findings (local and national) ● Results from consultation or engagement you have undertaken ● Service user monitoring data (including ethnicity, sex, disability, religion/belief, sexual orientation and age) ● Information from relevant groups or agencies, for example trade unions and voluntary/community organisations ● Analysis of records of enquiries about your service, or complaints or compliments about them ● Recommendations of external inspections or audit reports 		

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards. A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment and this also received regular refresh using the corporate programme.
2.2	What is the equalities profile of service users?	Service users are all residents and visitors within Bath and Keynsham where residents parking zones are currently located and therefore reflects the equalities profile of the general population. Residents living with a zone are entitled to purchase permit where they own a qualifying vehicle; however, as the permit authorises parking on the highway which impacts network congestion and air quality, the impact of the policy extends to all road users, including pedestrians.
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 76% of respondents rating the provision and operation of parking permits as acceptable to good.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>Parking Services undertook a first stage public consultation in April/May 2021 to seek views from all stakeholders on the proposals described in section 1.1 above. 1,086 responses were received with 71% of respondents being either very satisfied to neutral.</p> <p>Following the identification of impacted groups from preliminary Equalities Impacts Assessments, the Council undertook a Distributional Impact Assessment to further assess the impact of the resident permit proposals on relevant socio-economic groups. Issues identified within these assessments and the first stage consultation have been considered and have resulted in a review of this EQIA to include mitigating measures to address the issues and needs identified.</p>

2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	The Parking Strategy sets out objectives and actions which include a review of the available permit types and remove those that do not comply with the objectives and policies of the strategy. Further statutory consultation will be undertaken in the autumn of 2021 as part of the Traffic Regulation Order process.										
3. Assessment of impact: 'Equality analysis'												
	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or could help promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups 											
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th data-bbox="719 740 1330 874" style="width: 30%;">Examples of what the service has done to promote equality</th> <th data-bbox="1330 740 2074 874">Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</th> </tr> </thead> <tbody> <tr> <td data-bbox="719 874 1330 1011">3.1 Sex – identify the impact/potential impact of the policy on women and men.</td> <td data-bbox="1330 874 2074 1011">No impact based on gender – all who qualify regardless of gender are able to purchase parking via MiPermit.</td> </tr> <tr> <td data-bbox="719 1011 1330 1082">3.2 Pregnancy and maternity</td> <td data-bbox="1330 1011 2074 1082">No Impact</td> </tr> <tr> <td data-bbox="719 1082 1330 1219">3.3 Gender reassignment – identify the impact/potential impact of the policy on transgender people</td> <td data-bbox="1330 1082 2074 1219">No impact based on gender reassignment - – all who qualify are able to purchase parking via MiPermit.</td> </tr> <tr> <td data-bbox="719 1219 1330 1388">3.4 Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental</td> <td data-bbox="1330 1219 2074 1388">The addition of half day paper permits will provide greater flexibility and value for those not able to use digital permits. The on street element of the permit management scheme does not impact on disabled people as they are currently entitled to park in all on street pay and display bays within the geographical area of Bath & north East Somerset Council without displaying a pay</td> </tr> </tbody> </table>	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this	3.1 Sex – identify the impact/potential impact of the policy on women and men.	No impact based on gender – all who qualify regardless of gender are able to purchase parking via MiPermit.	3.2 Pregnancy and maternity	No Impact	3.3 Gender reassignment – identify the impact/potential impact of the policy on transgender people	No impact based on gender reassignment - – all who qualify are able to purchase parking via MiPermit.	3.4 Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental	The addition of half day paper permits will provide greater flexibility and value for those not able to use digital permits. The on street element of the permit management scheme does not impact on disabled people as they are currently entitled to park in all on street pay and display bays within the geographical area of Bath & north East Somerset Council without displaying a pay
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3.3 Gender reassignment – identify the impact/potential impact of the policy on transgender people	No impact based on gender reassignment - – all who qualify are able to purchase parking via MiPermit.											
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	<p>impairments and mental health)</p>	<p>From December 2020 a change in local policy means that a Blue Badge no longer entitles the holder to park in a permit holders bay without a residents parking permit. This change was made to align to the national Blue Badge scheme and provides consistency for all Blue Badge holders. Residents with Blue Badges that live in RPZs are entitled to a free resident's permit so they can use their Blue Badge in other vehicles and leave their own vehicle legally parked at home. However, the implementation of this new policy requires enabling works to assess where existing advisory bays are and where additional dedicated Blue Badge parking is needed to ensure that local amenities within RPZs remain accessible to Blue Badge holders. This enabling work is subject to resources being allocated as all the Council's area TROs must be reviewed and varied at the same time to ensure the policy can then be consistently applied. There are currently no resources identified in this year to undertake this enabling work, therefore Blue Badge holders will remain able to park in residents permit bays without a residents permit as long as they display their Blue Badge.</p>	<p>and display ticket provided a valid blue badge is clearly displayed.</p> <p>Customers which do not qualify for a Blue Badge but who may have difficulty accessing/using online/App based services may contact MiPermit for assistance 7 days a week by telephone.</p> <p>Blue Badge holders are permitted to park on yellow lines for up to 3 hours 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. This also allows Blue Badge holders to park for an unlimited time in on street pay and display bays located across the city centre.</p> <p>Once this enabling work (described in the left hand column) is complete and the policy has been enacted, Blue Badge holders that are residents of RPZs will be entitled to a residents permit free of charge. These changes will be communicated on the council's website and to all Blue Badge holders in Bath & North East Somerset.</p>
3.5	<p>Age – identify the impact/potential impact of the policy on different age groups</p>	<p>Previous feedback from council customers has told us that some older customers find digital systems more difficult to access and/or use. The addition of half day paper permits will provide greater flexibility and</p>	<p>Customers who have difficulty accessing/using online/App based services may contact MiPermit by telephone for assistance 7 days a week.</p>

		value for those not able to use digital permits.	
3.6	Race – identify the impact/potential impact on across different ethnic groups		No impact based on race – all who qualify are able to purchase parking permits via MiPermit
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No impact based on sexual orientation – all who qualify are able to purchase parking permits via MiPermit
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No impact based on marriage/civil partnership – all who qualify are able to purchase parking permits via MiPermit
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		No impact based on religion/beliefs/no religion – all who qualify are able to purchase parking permits via MiPermit
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	<p>The addition of half day paper permits will provide greater flexibility and value for those not able to use digital permits.</p> <p>A Distributional Impact Assessment was undertaken to assess the impact of the resident permit proposals on relevant socio-economic groups. This assessment identified no disproportionate impact on areas that are more deprived compared to those that are less deprived. All areas were</p>	There is no intended impact based on socio-economically disadvantage - all who qualify are able to purchase one through MiPermit. However, the costs of permits could have an impact on those who are economically disadvantaged where they own a polluting vehicle and are unable to replace it. Even with the higher costs attached to more polluting vehicles, the cost of a permit equates only to a small percentage of the annual costs of running a motor vehicle. This impact has been considered against the wider needs of vulnerable residents and pedestrians

		<p>shown to be equally impacted by increases in permit cost.</p> <p>However, it's noted that whilst there is no disproportionate impact to more deprived areas, individuals living within these areas could be impacted more significantly by an increase in costs than those in less deprived areas.</p>	<p>who are more at risk from the negative health impacts from high levels of pollution caused by vehicles.</p> <p>The average increase in cost for vehicles that are affected (69% of those currently with permits) is £25; however, analysis has shown that 65% will experience cost increases of up to 50%, and further 4% experiencing a cost increase of above 50%.</p> <p>To make the permits more affordable and flexible for customers that experience a price increase, we are proposing to make 6 month permits pro rata the same cost as an annual permit. In addition, we are proposing to introduce quarterly (also pro rata) and monthly permits. Monthly permits will incur an additional charge to reflect the increased number of permit fees and bank charges that these additional transactions will incur, which is equivalent to £7.40 per year, or £0.62 per month.</p>
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		No impact on rural communities – all who qualify are able to purchase parking permits via MiPermit

There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers.

The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1st June 2022
Issues raised by consultees through statutory consultation	Staff to review feedback and identify equalities issues and actions required as necessary.	Completion of review of feedback	Project lead	Within one month after consultation ends COMPLETE

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:
Date: 25/06/2021

C Major

(Divisional Director or nominated senior officer)

Equality Impact Assessment / Equality Analysis

Title of service or policy	Hotel/Guest House/Holiday Let/B&B Parking Permit
Name of directorate and service	Place - Environmental Services - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager - Parking
Date of assessment	24 June 2021

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The service provides private hospitality businesses who require access to parking facilities for guests/visitors with parking authorisation via the MiPermit digital parking permit system, replacing the existing paper permit.</p> <p>The service works by allowing authorised users to park in Council off street long stay car parks within the city centre allowing the business owner to provide a full service as part of their offering to customers.</p> <p>The service will be introduced to:</p> <ul style="list-style-type: none"> ● help ensure that businesses can provide guests/visitors parking in specific parking locations within reasonable access of their premises as part of a seamless booking transaction. ● improve customer self service – A one time only online application process to set up an account, reducing administration and delay currently experienced by renewals. ● the opportunity to ‘create parking stays for guests in advance at the time of booking. ● Prevent misuse of permits by staff – no permit cancellations for misuse

		<ul style="list-style-type: none"> • encourage the use of alternative transport by restricting the amount of available parking within the congested city centre • elimination of the waste created through the use of paper permits and the need to issue by post
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>The system provides improvements to customer service and reduces public sector costs by encouraging customers to self-serve and reduce the number of copied permits, whilst also helping to reduce fraud and system abuse.</p> <p>The scope of the system also extends to include other digital permits, which facilitate cashless parking for ad hoc stays. Allowing customers to purchase parking without the need for cash or a permit covering a fixed period.</p> <p>The system supports freedom and fairness and was targeted at addressing the parking needs of those people who live and work in Bath & North East Somerset Councils geographical area.</p> <p>It is not a national requirement and there is room for review.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	This Policy is in line with Transport Polices and the Parking Strategy. This policy is also consistent with (although is not designed to achieve) the objectives of the Climate Emergency and the Clean Air Plan.
<p>2. Consideration of available data, research and information</p>		

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, sex, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints or compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards. A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment and this also received regular refresh using the corporate programme.
2.2	What is the equalities profile of service users?	Any hospitality business providing accommodation to visitors that is within a residents parking zone and requires parking for customers within the geographical area of Bath and North East Somerset can potentially purchase a permit, therefore the service users are likely to be representative of the national population. However, some permits have restrictions such as they need to be a qualifying business within a parking zone. http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping

2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 76% of respondents rating the provision and operation of parking permits as acceptable to good.	
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>Parking Services undertook a first stage public consultation in April/May 2021 to seek views from all stakeholders on the proposals described in section 1.1 above. 1,086 responses were received with 71% of respondents being either very satisfied to neutral.</p>	
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	<p>The Parking Strategy sets out objectives and actions which include a review of the available permit types and remove those that do not comply with the objectives and policies of the strategy.</p> <p>Further statutory consultation will be undertaken in the autumn of 2021 as part of the Traffic Regulation Order process.</p>	
3. Assessment of impact: ‘Equality analysis’			
<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or could help promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups 			
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Sex – identify the impact/potential impact of the policy on women and men.		No impact based on gender – all who qualify regardless of gender are issued a permit

3.2	Pregnancy and maternity		No Impact -all who qualify are issued a permit
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No impact based on transgender – all who qualify regardless of gender or gender transformation are issued a permit
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	<p>Parking Services can assist customers applying for permits both at Council One Stop Shops, which now include greater support for assistance with online services and contact MiPermit by telephone for assistance 7 days a week</p> <p>From December 2020 a change in local policy means that a Blue Badge no longer entitles the holder to park in a permit holders bay without a residents parking permit. This change was made to align to the national Blue Badge scheme and provides consistency for all Blue Badge holders. Residents with Blue Badges that live in RPZs are entitled to a free resident's permit so they can use their Blue Badge in other vehicles and leave their own vehicle legally parked at home. However, the implementation of this new policy requires enabling works to assess where existing advisory bays are and where additional dedicated Blue Badge parking is needed to ensure that local amenities within RPZs remain accessible to Blue Badge holders. This enabling work is subject to resources being allocated as all the Council's area TROs must be reviewed and varied at the same time to ensure the policy can then</p>	<p>The on street element of the permit management scheme does not impact on people with disabilities as they are currently entitled to park in all on street pay and display bays within the geographical area of Bath & north East Somerset Council without displaying a pay and display ticket provided a valid blue badge is clearly displayed.</p> <p>Customers which do not qualify for a Blue badge but who may have difficulty accessing/using online/App based services may contact MiPermit for assistance 7 days a week by telephone.</p> <p>Not being able to park close to the premises that are staying at may be detrimental to the needs of Blue Badge holders and likely to increase anxiety regarding safety and security.</p> <p>Blue Badge holders are permitted to park on yellow lines for up to 3 hours 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. This also allows Blue Badge holders to park for an unlimited time in on street pay and display bays located across the city centre.</p>

		<p>be consistently applied. There are currently no resources identified in this year to undertake this enabling work, therefore Blue Badge holders will remain able to park in residents permit bays without a residents permit as long as they display their Blue Badge.</p>	<p>Once the enabling work is complete and the policy has been enacted, Blue Badge holders who are guests of premises within the inner Hotel permit zone (comprising central; 01 and 06 zones) will be able to park on street with a valid Hotel permit AND where they display their Blue Badge. These changes will be communicated on the council's website and to all Blue Badge holders in Bath & North East Somerset.</p> <p>The city centre is covered by extensive CCTV 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</p>
3.5	Age – identify the impact/potential impact of the policy on different age groups		No impact. Staff operating a business will be able to activate a customer's parking by either using the permit account or contacting MiPermit 7 days a week by telephone.
3.6	Race – identify the impact/potential impact on across different ethnic groups		No impact based on race – all who qualify regardless of race are issued a permit
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No impact based on sexual orientation – all who qualify regardless of sexual orientation are issued a permit

3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No impact
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		No impact based on religion/beliefs/no religion – all who qualify regardless of religion/beliefs/no religion are issued a permit
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).		No Impact
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		No impact based on those who live in rural communities – all who qualify regardless of address are issued a permit.

There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers.

The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1st June 2022
Issues raised by consultees through statutory consultation	Staff to review feedback and identify equalities issues and actions required as necessary.	Completion of review of feedback	Project lead	Within one month after consultation ends COMPLETE

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: C Major

(Divisional Director or nominated senior officer)

Date: 25/06/2021

Equality Impact Assessment / Equality Analysis

Title of service or policy	Medical Parking Permit
Name of directorate and service	Place - Environmental Services - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager - Parking
Date of assessment	24 June 2021

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The service will provide Medical/Healthcare and Care professionals access to parking facilities to carryout home visits with parking authorisation via the MiPermit digital parking permit system, replacing existing paper permits.</p> <p>The service works by allowing authorised users to park in locations throughout the geographical area of Bath & North East Somerset Council where parking restrictions apply.</p> <p>The scheme will be introduced to:</p> <ul style="list-style-type: none"> ● help ensure that those who meet the criteria for a medical permit can parking in specific parking locations within proximity of those requiring their service. ● efficiency- online application process to set up a 'Medical permit', reducing administration and delay and increase flexibility to manage account online 24hrs a day, including self serve renewals ● prevent the need to display a paper permit giving increased privacy and security for those working in this sector, and the patients they visit. ● elimination of the waste created through the use of paper permits and the need to issue by post
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>The system provides improvements to customer service and reduces public sector costs by encouraging customers to self-serve and reduce the number of copied permits, whilst also helping to reduce fraud and system abuse.</p> <p>The system supports freedom and fairness and was targeted at addressing the parking needs of those people who live and work in Bath & North East Somerset Councils geographical area.</p> <p>It is not a national requirement and there is room for review.</p>

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	This Policy is in line with Transport Polices and the Parking Strategy. It is consistent with (although is not designed to promote)the objectives of the Climate Emergency and Clean Air Plan.
2. Consideration of available data, research and information		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> ● Demographic data and other statistics, including census findings ● Recent research findings (local and national) ● Results from consultation or engagement you have undertaken ● Service user monitoring data (including ethnicity, sex, disability, religion/belief, sexual orientation and age) ● Information from relevant groups or agencies, for example trade unions and voluntary/community organisations ● Analysis of records of enquiries about your service, or complaints or compliments about them ● Recommendations of external inspections or audit reports 		
	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards. A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment and this also received regular refresh using the corporate programme.
2.2	What is the equalities profile of service users?	Service users are all business and their employees who deliver residential care and treatment to their patients in their own homes.
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 76% of

		respondents rating the provision and operation of parking permits as acceptable to good.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>A consultation with Medical Permit users and their administrators in 2017- 60% of respondents felt there were some or good potential benefits. 72% of respondents said they felt a time limit would or may help ensure permits are only used for home visits 80% of respondents advised the majority of visits made to a patient/resident’s home takes no more than 2 hours. 64% of respondents indicated the proposed increase in cost (from £60 to £100 – in line with a first residents permit) would influence their future purchase of permits.</p> <p>Parking Services undertook a first stage public consultation in April/May 2021 to seek views from all stakeholders on the proposals described in section 1.1 above. 1,086 responses were received with 71% of respondents being either very satisfied to neutral.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	<p>The Parking Strategy sets out objectives and actions which include a review of the available permit types and remove those that do not comply with the objectives and policies of the strategy.</p> <p>This will include further engagement and consultation with the relevant groups as appropriate.</p>
<h3>3. Assessment of impact: ‘Equality analysis’</h3>		
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> Meets any particular needs of equalities groups or could help promote equality in some way. 	

	<ul style="list-style-type: none"> ● Could have a negative or adverse impact for any of the equalities groups 		
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Sex – identify the impact/potential impact of the policy on women and men.		No impact based on gender – all who qualify regardless of gender are issued a permit
3.2	Pregnancy and maternity		No Impact -all who qualify are issued a permit
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No impact based on transgender – all who qualify regardless of gender reassignment are issued a permit
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	Customers who have difficulty accessing/using online/App based services may contact MiPermit by telephone for assistance 7 days a week.	The on street element of the permit management scheme does not impact on people with disabilities as they are currently entitled to park in all on street pay and display bays within the geographical area of Bath & north East Somerset Council without displaying a pay and display ticket provided a valid blue badge is clearly displayed. Customers which do not qualify for a Blue badge but who may have difficulty accessing/using online/App based services may contact MiPermit for assistance 7 days a week by telephone.
3.5	Age – identify the impact/potential impact of the policy on different age groups		Customers who have difficulty accessing/using online/App based services may contact MiPermit by telephone for assistance 7 days a week.
3.6	Race – identify the impact/potential impact on across different ethnic groups	People who have English as an additional Language may be over-represented in caring professions - There will be a strapline on the document relating to medical permits,	No impact based on race – all who qualify regardless of race are issued a permit

		allowing people to request a copy in a different language.	
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No impact based on sexual orientation – all who qualify regardless of sexual orientation are issued a permit
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No Impact
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		No impact based on religion/beliefs/no religion – all who qualify regardless of religion/beliefs/no religion are issued a permit
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).		No Impact
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		No impact based on those who live in rural communities – all who qualify regardless of address are issued a permit.

There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager – Parking	1 st June 2022
Issues raised by consultees through engagement or consultation exercise	Staff to review feedback and identify equalities issues and actions required as necessary.	Completion of review of feedback	Project lead	One month after engagement ends COMPLETE

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:
Date: 25/06/2021

C Major

(Divisional Director or nominated senior officer)

Equality Impact Assessment / Equality Analysis

Title of service or policy	on street parking charges
Name of directorate and service	Place - Environmental Services - Parking Services
Name and role of officers completing the EIA	Andrew Dunn, Team Manager - Parking
Date of assessment	24/06/2021

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>A review of on street parking charges has been undertaken with proposals to implement increases at least in line with inflation to be applied for the next three years. The purpose of the increases is to ensure that as a minimum the charges remain relative in terms with inflation and continue to meet Parking Strategy and Transport Strategy objectives.</p> <p>Increased charges to be accompanied by the removal of the service charge for digital transactions purchased through MiPermit, encouraging the channel shift of customers to digital services.</p> <p>Proposals also look to extend on street charges to included Sundays, which is currently free. This aligns the on street charges to those of car parks now that the Park & Ride service operates 7 days a week, and will ensure an increased availability of spaces for local residents and short stays, complementing other schemes to reutilise road space such as low traffic and liveable neighbourhoods.</p> <p>Trade permits allow small businesses, including landlords, to park in any permit holders bay or pay and display bay on street (also valid in car parks) and pay for parking. Within time limited areas, holders can activate and pay for parking stays that are longer than the maximum stay period at any location. Trade stays are to be increased in line with on street charges.</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>There is no national requirement and as such there is room for review. However, although not the purpose of these proposals, it is noted that by implementing these changes it should assist in the Introduction of a Clean Air Zone and help in addressing the climate emergency by encouraging the use of sustainable transport and active travel.</p>

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	This Policy is in line with Transport Polices and the Parking Strategy. It is consistent with (although is not designed to promote) the objectives of the Climate Emergency and Clean Air Plan
2. Consideration of available data, research and information		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> ● Demographic data and other statistics, including census findings ● Recent research findings (local and national) ● Results from consultation or engagement you have undertaken ● Service user monitoring data (including ethnicity, sex, disability, religion/belief, sexual orientation and age) ● Information from relevant groups or agencies, for example trade unions and voluntary/community organisations ● Analysis of records of enquiries about your service, or complaints or compliments about them ● Recommendations of external inspections or audit reports 		
	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards. A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment and this also received regular refresh using the corporate programme.
2.2	What is the equalities profile of service users?	Anyone who requires parking within the geographical area of Bath and North East Somerset can potentially purchase parking, therefore the service users are likely to be representative of the national population. http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping

2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 57% of respondents rating the provision and operation of on street parking areas as acceptable to good.	
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>No specific consultation has been undertaken as part of this EIA as it is a review of existing services.</p> <p>Parking Services undertook a first stage public consultation in April/May 2021 to seek views from all stakeholders on the proposals relating to Trade permits. 1,086 responses were received with 71% of respondents being either very satisfied to neutral.</p> <p>No specific consultation has been undertaken as part of this EIA as it is a review of existing services.</p>	
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	Charges are to be set within the Council’s Traffic Regulation Orders, which require a Statutory Notification period. Persons are welcome to lodge objections if they feel there is an equalities issue to be addressed and the Council is mandated to consider such objections.	
3. Assessment of impact: ‘Equality analysis’			
<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or could help promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups 			
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this

3.1	Sex – identify the impact/potential impact of the policy on women and men.		No impact
3.2	Pregnancy and maternity		No Impact
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No impact
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)		The on street element of scheme does not impact on people with disabilities as they are currently entitled to park in all on street pay and display bays within the geographical area of Bath & north East Somerset Council for free provided a valid blue badge is clearly displayed. A Blue badge also allows up to 3 hours of parking when parking on yellow lines where no loading restrictions are in place. It should be noted that there are other changes taking place related to Covid-19 social distancing, which restrict motor vehicle access to some roads within the city during the hours 10.00 to 18.00/2200. Additional work has been undertaken to consider some of the issues experienced by Blue Badge holders as a result of these road closures and to review the provision and location of Blue Badge bays and single yellow line parking options.
3.5	Age – identify the impact/potential impact of the policy on different age groups		No Impact
3.6	Race – identify the impact/potential impact on across different ethnic groups		No impact

3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No impact
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No impact
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		Those using on street parking to worship on Sundays will have to pay for parking. Parking is not currently provided for free to those whose religious holy days are on days other than a Sunday. .
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).		Whilst there is no intended impact based on socio-economically disadvantage- all who qualify can purchase parking, increased charges could have an impact on those who are economically disadvantaged. However, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle and therefore the impact is small and other more sustainable options including active travel are also available.
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		Whilst there is no intended impact for those living in rural communities, they may now need to pay for parking charges is using on street parking when visiting Bath. However, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle and therefore the impact is small and

			other more sustainable options including the Park and Ride are available 7 days a week
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There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1 st June 2022
Issues raised by consultees through engagement or consultation exercise	Staff to review feedback and identify equalities issues and actions required as necessary.	Completion of review of feedback	Project lead	One month after engagement ends COMPLETE

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: C Major
Date: 25/06/2021

(Divisional Director or nominated senior officer)

Equality Impact Assessment / Equality Analysis

Title of service or policy	Prioritise walking, cycling, micro mobility and public transport over car use by residents
Name of directorate and service	Place-Environmental Services-Parking Services
Name and role of officers completing the EIA	Andrew Dunn- Parking Team Manager
Date of assessment	24/06/2021

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>Currently residents can receive a discount of 10% off their daily paid for parking when using MiPermit in Bath, this is a disincentive to use more sustainable transport and active travel modes such as walking and cycling.</p> <p>Removing this discount ends the disincentive.</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>This is a review of a current service and is not a national requirement therefore there is room for review.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>Policy is in line with Transport Polices and the Parking Strategy. It is consistent with (although is not designed to promote) the objectives of the Climate Emergency and Clean Air Plan. It helps to promote more active lifestyles through active travel and to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution</p>
2. Consideration of available data, research and information		

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, sex, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards. A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment and this also received regular refresh using the corporate programme.
2.2	What is the equalities profile of service users?	Service users are all residents of Bath and North East Somerset that drive into Bath city centre therefore reflects the equalities profile of the general population.
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019) record 57% of respondents rating the provision and operation of on street parking areas, and 66% rating the car park provision, as acceptable to good.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028. No specific consultation has been undertaken as part of this EIA as it is a review of existing services.

2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	Charges are to be set within the Council's Traffic Regulation Orders, which require a Statutory Notification period. Persons are welcome to lodge objections if they feel there is an equalities issue to be addressed and the Council is mandated to consider such objections.	
3. Assessment of impact: 'Equality analysis'			
Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or could help promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups 			
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Sex – identify the impact/potential impact of the policy on women and men.		No Impact
3.2	Pregnancy and maternity		No Impact
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people		No Impact
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	Disabled residents who are Blue Badge Holders can park for free with no time limit in the following areas: <ul style="list-style-type: none"> ● On street parking in Pay and Display zones where time is restricted for non-Blue Badge holders 	The removal of the 10% reduction will mean that parking charges will increase slightly for all groups, including disabled residents who are not Blue Badge Holders (with the free parking options in the left hand column). However, the 10% saving against the cost of parking was reduced by the 10p service charge for digital transactions which is proposed to be absorbed.

		<ul style="list-style-type: none"> • Advisory disabled persons parking bays • Charlotte Street car park - disabled persons bays located within the Charlotte Street entrance area only • Bath Park and Ride car parks <p>Disabled residents who are Blue Badge Holders can park for free but time limited in the following:</p> <ul style="list-style-type: none"> • Single and double yellow lines where no loading ban applies (maximum stay of 3 hours) 	
3.5	Age – identify the impact/potential impact of the policy on different age groups		No Impact
3.6	Race – identify the impact/potential impact on across different ethnic groups		No Impact
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No Impact
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?		No Impact
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different		No Impact

	religious/faith groups and also upon those with no religion.		
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).		Whilst there is no intended impact based on socio-economically disadvantage- all who qualify can purchase ad hoc parking tickets, the removal of the 10% discount could have an impact on those who are economically disadvantaged. However, the increased costs of ad hoc parking stays equate only to a small percentage of the annual costs of running a motor vehicle and therefore the impact is small. The saving against the daily cost of parking is much less than can be achieved from alternative travel choices such as park and ride or active travel. The saving for short stays is currently offset by the 10p service charge for digital transactions.
3.11	Rural communities* – identify the impact / potential impact on people living in rural communities		No Impact

There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA.		Team Manager – Parking	1 st June 2022
Ongoing monitoring	Staff will regularly review issues raised by members of the public to identify if there are any unintended negative impacts for particular groups			

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:
Date: 25/06/2021

C Major

(Divisional Director or nominated senior officer)



RPZ Review - Parking Permit Proposals

Distributional Impact Assessment

DIA-1 | 1
June 2021

Bath & North East Somerset Council

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RPZ Review - Parking Permit Proposals

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Contents

1.	Introduction	1
1.1	Background	1
1.2	Distributional impact assessment	1
1.2.1	Screening and appraisal process	1
1.2.2	Assessment criteria	1
1.3	Scheme and study area	2
1.3.1	Scheme proposals	2
1.3.2	Study area	3
2.	Step 1: Screening	5
3.	Step 2: Assessment	8
3.1	Step 2a: Confirmation of areas impacted by the intervention.....	8
3.2	Step 2b: Identification of social groups in the impact area.....	8
3.2.1	Population Size.....	8
3.2.2	Low Income Households	9
3.2.3	Children.....	9
3.2.4	Young people.....	9
3.2.5	Elderly People.....	10
3.2.6	Disabled People	10
3.2.7	Ethnic Minorities	10
3.2.8	Car ownership	10
3.2.9	Dependent children	10
3.2.10	Summary of demographic data.....	10
3.3	Step 2c: Identification of Amenities in the Impact Area	15
4.	Step 3: Appraisal.....	16
4.1	Affordability	16
5.	Summary.....	19

1. Introduction

1.1 Background

Poor air quality is the largest known environmental risk to public health in the UK¹. Investing in cleaner air and doing more to tackle air pollution are priorities for the EU and UK governments, as well as for Bath and North East Somerset Council (B&NES). B&NES has monitored and endeavoured to address air quality across its area since 2002. In 2017 the government published a UK Air Quality Plan for Nitrogen Dioxide² setting out how compliance with the EU Limit Value for annual mean NO₂ will be reached across the UK in the shortest possible time. Due to forecast air quality exceedances, B&NES, along with 27 other Local Authorities, was directed in 2017, by Ministers at Defra and DfT, to produce a Clean Air Plan (CAP), to set out how they will achieve sufficient air quality improvements in the shortest possible time. The Plan is currently being implemented, and as part of this a Clean Air Zone (CAZ) in the centre of the city, class 'C' charging non-compliant commercial vehicles, went live in March 2021.

Also as part of the council's continuing programme to addressing air quality and traffic management issues through the management of parking behaviour on the highway, B&NES is seeking to amend the charges levied for on-street parking permits for residents of restricted parking zones (RPZ) in the council area, most of which are in the city of Bath. Revised charges would be linked with vehicle emissions, charges accordingly increasing with emissions, with the aim being to encourage the use of less polluting vehicles.

Jacobs has been commissioned by B&NES to produce a Distributional Impact Assessment of the proposal. This report outlines the overarching framework and detailed analysis that assesses the proposal on relevant socio-economic groups. It presents the key assumptions, approach and structure of the impact analysis, leading to an identification of particular distributional and equality issues and concerns.

1.2 Distributional impact assessment

1.2.1 Screening and appraisal process

The evidence base for distributional impacts associated with parking permit change has been accumulated through research originally part of the distributional impact assessments of the CAP and CAZ. Analyses applied to the RPZ charging proposals have been prepared in accordance with TAG Unit A4.2 ('Distributional Impact Appraisal'). A three-step approach has been followed, involving:

- Step One – Screening: impacts that the scheme might have are considered and prioritised for further analysis; only the most relevant indicators for the scheme are appraised to ensure proportionality.
- Step Two – Assessment: information is collected on the geographical area likely to be affected and how different social groups are distributed within that geographical area.
- Step Three – Appraisal: an assessment is made as to the extent of the impact of the scheme on the social groups identified (for the impacts included in the assessment).

This report determines the impacts likely to be associated with the scheme and what analysis would be best suited to investigating these impacts, depending on the data available and how sensitive the issue is.

1.2.2 Assessment criteria

In order to understand whether or not a particular group is being unduly disadvantaged by the proposed option, it is necessary to understand whether impacts are disproportionate. In order to investigate whether impacts are disproportionate, it is necessary to obtain an understanding of how impacts are occurring, whether they are

¹ Public Health England (2014) Estimating local mortality burdens associated with particular air pollution.

<https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution>

² <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

acceptable or whether the option should be altered or mitigated. The following scale is used as a guide to determine the scale and extent of an impact.

Note that the assessment scoring outlined in Table 2.1 is undertaken relative to population sizes, comparing the proportion of net winners or losers in each socio-economic quintile to that socio-economic quintile's share of population in the study area. Therefore, a larger score (of '✓✓✓' or '×××') is indicative of impacts falling disproportionately on a particular quintile relative to that quintile's population share across the study area as a whole. So, if 20% of an impact falls on socio-economic quintile x, but socio-economic quintile x only form 10% of the study area population, a large assessment score will be recorded.

Table 1.1: Distributational Impact Assessment criteria

Assessment	Impact Description
✓✓✓	Large beneficial Beneficial and the population impacted is significantly greater than the proportion of the group in the total population
✓✓	Moderate beneficial Beneficial and the population impacted is broadly in line with the proportion of the group in the total population
✓	Slight beneficial Beneficial and the population impacted is smaller than the proportion of the group in the total population
-	Neutral There are no significant benefits or disbenefits experienced by the group for the specified impact
×	Slight adverse Adverse and the population impacted is smaller than the proportion of the population of the group in the total population
××	Moderate adverse Adverse and the population impacted is broadly in line with the proportion of the population of the group in the total population
×××	Large adverse Adverse and the population impacted is significantly greater than the proportion of the group in the total population

1.3 Scheme and study area

1.3.1 Scheme proposals

As noted above, B&NES is seeking to amend the charges levied for on-street parking permits for residents of restricted parking zones (RPZ) in the council area. This part of a series of parking-related proposals, the aims of which are to: ³

- Improve air quality in the shortest possible time 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; and
- Facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods.

Other aspect of the wider parking-related proposals include changes to on-street parking charges (both the costs and timings), amendments to trade-based parking permits, procedures for temporary suspensions of restrictions, changes to specialist permits (such as for medical access and use of hotels), review of historic paper permits (that are still in use) and residents' access to visitor permits.

This report considers the impacts of changes to on-street parking for residents, specifically the introduction of emissions-based parking permits for all residents parking zones, which is described briefly below:

³ The aims of the proposals, as well as detailed descriptions of emissions-based permits, are taken from the 'Council Executive Covering Report' on the subject, which can be found at the following link on the council's website: <https://democracy.bathnes.gov.uk/documents/s64642/E3253%20-%20Addressing%20air%20quality%20and%20traffic%20management%20issues%20through%20the%20management%20of%20parking%20behav.pdf>

- The proposal is designed to achieve the objectives (above) by encouraging a switch to low emission vehicles and a shift to mass transport, walking and cycling;
- In line with precedents set by other Local Authorities, the pricing policy is based on vehicle carbon dioxide (CO₂) emissions as per Vehicle Excise Duty (VED) classification with bands at 1st April 2017. As CO₂ is by-product of internal combustion, a reduction in CO₂ emissions through reduced combustion will therefore reduce other pollutants within vehicle emissions which are harmful to pedestrian safety.
- 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 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 implemented across all residents parking zones in Bath & North East Somerset. Prices for more polluting vehicles are set higher based proportionately on their emissions. Where a VED emissions rating is not available, including all pre 2001 registered vehicles, the prices are set at a standard level based on engine capacity, similar to the approach for VED.

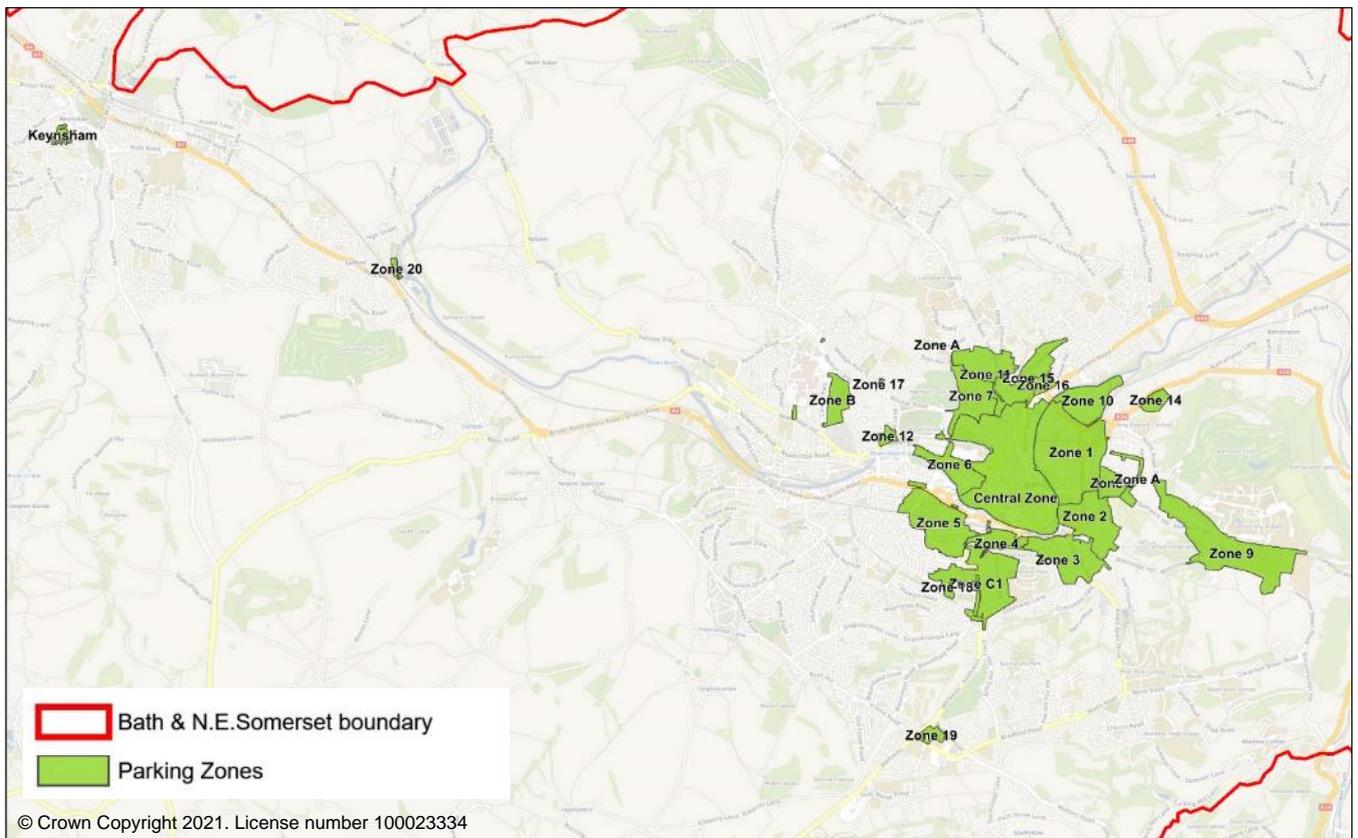
It is envisaged that implementation of emissions-based parking permits for residents will be in place before the end of financial year 2021/22.

1.3.2 Study area

Most of the RPZ areas are within the city of Bath, and indeed are largely located in central areas of the city, with a few located away from the centre, with the only areas outside the city being two small zones in Saltford and Keynsham. Figure 1.1 shows the locations of the RPZs.

A layered approach to identifying the study area for the assessment of distributional impacts was adopted. This reflects the potential variation in spatial extent of any impacts that materialise. The immediate study area is the population of residents within the RPZs. Clearly as an existing residents' parking scheme, the impact of changing charges will fall to residents of the scheme areas. For comparison though, the distributional impact assessment consider a wider study area of the B&NES local authority area, with reference to the other administrative areas forming the West of England (WoE) sub-region (i.e. Bristol, South Gloucestershire and North Somerset) for relative consideration of incomes. The analysis presented in this report uses the appropriate study area definition based on the socio-economic group and impact variable being considered.

Figure 1.1: Location of Bath & North East Somerset parking zones



2. Step 1: Screening

The first step in the assessment process involves undertaking an initial screening of the key impacts specified in TAG Unit A4.2, to identify those impacts that could potentially be affected by the proposals and any that are unlikely to be affected.

Key outcomes and conclusions of the initial screening are summarised in Table 2.1. It should be noted that most of the impacts identified are 'screened-out' at this stage.

Table 2.1: Distributional Impact Assessment – Initial Screening

Impact Area	Conclusion	Next Step
User Benefits	<p>There are no specifically identifiable user benefit impacts with changes to residents' parking permit charges. Trip changes may be observed should residents chose to dispose of vehicles, but even should this happen it is impossible to reliably quantify the specific impact on trip-making as a result of changes to permit costs.</p> <p>It is worth noting though that an aim of the overall parking-proposal is as part of the suite of measures to facilitate broader outcomes of reduced congestion and vehicle intrusion, so a small beneficial impact could be anticipated, if not measured. As user benefits cannot sensibly be calculated, distribution of user benefits is therefore also not possible to quantify.</p> <p>Summary: Potential small beneficial impact (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable user benefit impact): No further analysis required</p>
Noise	<p>No noise analysis has been carried out. As for user impacts, changes to residents' parking permit charges will have very limited impact on noise. Trip-making changes may be observed should residents chose to dispose of vehicles, but even should this happen it is impossible to reliably quantify the specific impact on noise. As for user impacts, a small beneficial impact could be anticipated, if not measured, with the proposal being part of the suite of measures to facilitate broader outcomes of reduced congestion and vehicle intrusion. As noise impacts are not being modelled, distribution of noise impacts is therefore also not possible to quantify.</p> <p>Summary: Potential small beneficial impact (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable noise impact): No further analysis required</p>
Air Quality	<p>No specific air quality analysis has been carried out for proposed changes to residents' parking permit charges.</p> <p>Direct impact on air quality is difficult to specifically attribute to parking permit charges. As for noise and user benefits, trip-making changes may be observed should residents chose to dispose of vehicles, but even should this happen it is impossible to reliably quantify the specific impact on air quality.</p> <p>However, a key aspect of the proposed permit regime is to encourage less-polluting vehicles, through the scale of charges proposed rising with CO₂ emissions, with an additional supplement for diesel cars (reflecting their greater impact on NO₂ and local air quality than petrol powered vehicles). It is notable though that zero-emission (electric) vehicles are not exempt, acknowledging that permits for parking are required for physical reasons of capacity in the principal instance.</p>	<p>Distributional assessment: neutral (no measurable air quality impact): No further analysis required</p>

Table 2.1: Distributional Impact Assessment – Initial Screening

Impact Area	Conclusion	Next Step
	<p>Hence, a small beneficial impact would be anticipated, as residents may choose to change to lesser-polluting vehicles over time, although this cannot readily be measured. As air quality impacts are not being modelled, distribution of air quality impacts is therefore also not possible to quantify.</p> <p>Summary: Potential small beneficial impact (not measurable), distributional impact neutral.</p>	
Accidents	<p>No accident analysis has been carried out. Changes to residents' parking permit charges will have very limited impact on trip-making, and hence accidents. Changes may be observed should residents dispose of vehicles, but should this happen it is impossible to reliably quantify the specific impact on accidents. As for user impacts, a small beneficial impact could be anticipated, if not measured, with the proposal being part of the suite of measures to facilitate broader outcomes of reduced congestion and vehicle intrusion. As accident impacts are not being modelled, distribution of accident impacts is therefore also not possible to quantify.</p> <p>Summary: Potential very small beneficial impact (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable accident impact): No further analysis required</p>
Security	<p>There are no direct security impacts. A small security disbenefit could be anticipated, if not measured, if residents chose to park vehicles in locations remote from their residence and walk (albeit this could only occur in zones that are sufficiently close to areas with suitably lower levels of restriction). However, it is not possible to quantify. As security impacts are not being modelled, distribution of security impacts is therefore also not possible to quantify.</p> <p>Summary: Potential very small disbenefit (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable security impact): No further analysis required</p>
Severance	<p>There are no direct severance impacts. A small beneficial severance impact could be anticipated, if not measured, with the proposal being part of the suite of measures to facilitate broader outcomes of reduced congestion and vehicle intrusion across residential areas. However, it is not possible to quantify. As severance impacts are not being modelled, distribution of accessibility impacts is therefore also not possible to quantify.</p> <p>Summary: Potential very small beneficial impact (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable severance impact): No further analysis required</p>
Accessibility	<p>There are no direct accessibility impacts, as the proposal does not affect provision of public transport. A small beneficial accessibility impact could be anticipated, if not measured, with the proposal being part of the suite of measures to facilitate broader outcomes of reduced congestion and vehicle intrusion across residential areas. However, it is not possible to quantify. As accessibility impacts are not being modelled, distribution of accessibility impacts is therefore also not possible to quantify.</p> <p>Summary: Potential very small beneficial impact (not measurable), distributional impact neutral.</p>	<p>Distributional assessment: neutral (no measurable accessibility impact): No further analysis required</p>

Table 2.1: Distributional Impact Assessment – Initial Screening

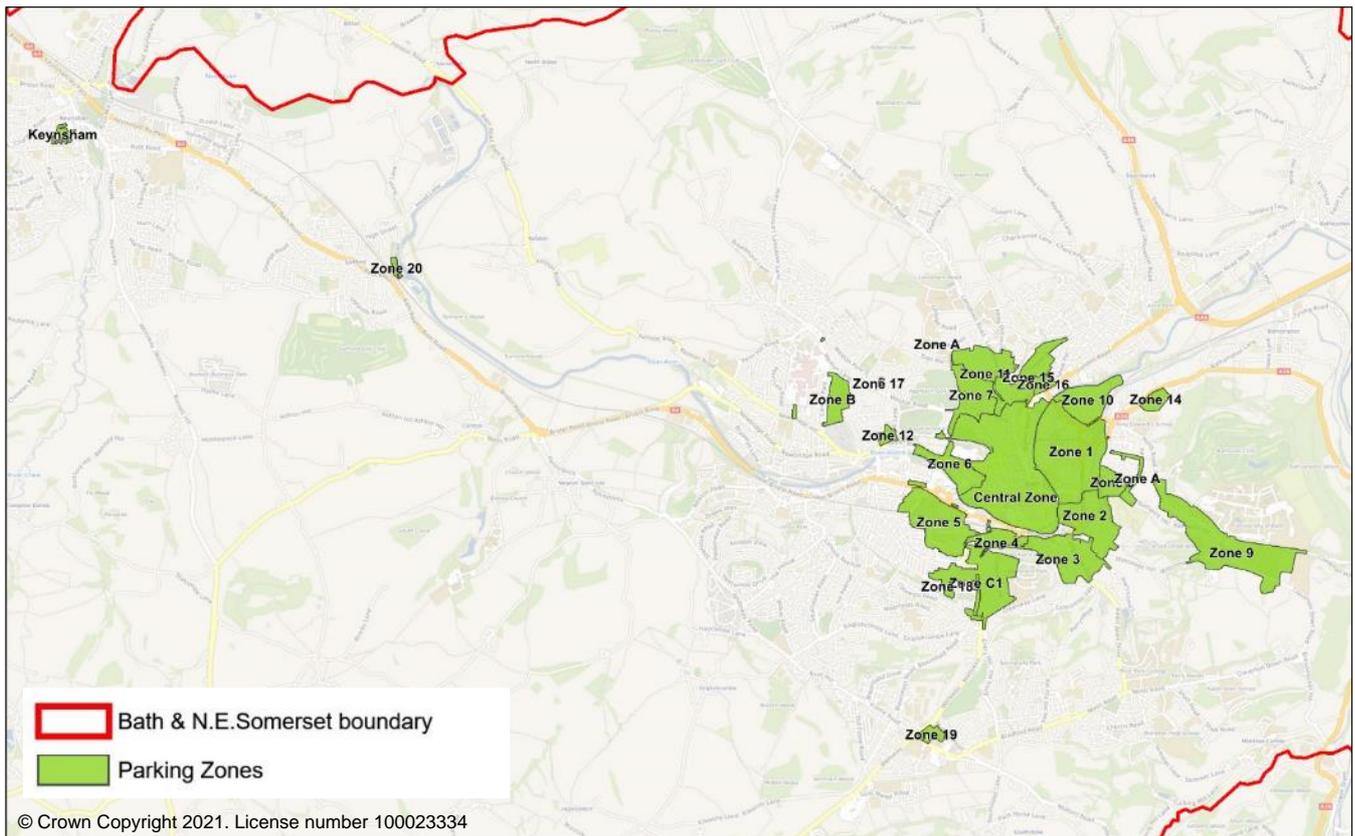
Impact Area	Conclusion	Next Step
Affordability	<p>Overall, the proposal will increase the cost of parking permits. The proposed changes to parking permit charges will result in increases for the majority of residents. Analysis of existing permits issues, with the new charging regime applied, indicates that around two thirds of existing parking permits will increase in price (assuming no response from residents to dispose of or replace more polluting, and hence higher permit cost vehicles). Only a small number of existing permit holders will see their permit costs reduce (around 1%), though the remaining approx. 30% will see no change.</p> <p>Distributional impacts assessed.</p>	Progress to step 2

3. Step 2: Assessment

3.1 Step 2a: Confirmation of areas impacted by the intervention

Figure 3.1 shows the impact area of the scheme, consisting of the population resident within the parking zones that will see changes to the charges for residents' parking permits.

Figure 3.1: Impact area – B&NES RPZ locations



3.2 Step 2b: Identification of social groups in the impact area

This section provides an assessment of the social groups affected by the proposals, based on the potential impacts identified in the screening assessment in Step 1 and the 'affected areas' identified in Step 2a.

The social groups considered in relation to each impact follow the guidance provided in TAG Unit A4.2. Table 3.1 reproduces Table 2 from TAG Unit A4.2, which shows all impacts and all demographic groups for completeness. In this report, demographic information has been considered for all social groups in the table, not just restricted to those directly related to impacts taken forward for distributinal impact assessment.

3.2.1 Population Size

The population of B&NES was estimated at 188,678 in 2017 (ONS Population Estimates), an increase of more than 9% since 2007. Just over 25,000 people live in the RPZ areas (14% of the total population of B&NES). Population density varies between the city centre core and the rural hinterland. The city centre core, which is the location of most RPZs, is the most densely populated region within the local authority area. Based on 2011 Census data, the three most densely populated lower super output areas (LSOAs) are located within the city centre core and will be directly affected by implementation of changes to RPZs.

Table 3.1: Impact on Social Groups

Dataset/ Social Group	User Benefits	Noise	Air Quality	Accidents	Security	Severance	Access- ibility	Afford- ability
Income Distribution	✓	✓	✓				✓	✓
Children: % under 16		✓	✓	✓	✓	✓	✓	
Young Adults: % aged 16-25				✓			✓	
Older People: % aged 70+		✓		✓	✓	✓	✓	
Disabled People: % of pop					✓	✓	✓	
Black or Minority Ethnic origin: % of pop					✓		✓	
No Car or Van: % of households						✓	✓	
Carers: % of hh with dependent children							✓	

Source: Reproduction of Table 2 from TAG Unit A4.2 (Distributional Impact Appraisal) ⁴

3.2.2 Low Income Households

The distribution of low-income groups was determined through analysis of the 2019 Indices of Deprivation's (ID 2019) 'Income Domain'. The ID ranks LSOA areas in terms of levels of income, measured by the number of people that are out-of-work and those that are in work but who have low earnings. The income domain therefore acts as a suitable proxy for defining low-income groups.

Figures 3.2 and 3.3 map the distribution of low income LSOAs, and by proxy, low-income households across the impact area, where Figure 3.2 provides the distribution of income deprivation across the West of England, and Figure 3.3 is based on national (England) levels of income deprivation. Both figures demonstrate that generally, the impact area is a relatively affluent location. The analysis shows that most of the RPZs are in the middle or upper quintiles of income deprivation (i.e. middle to least deprived). Indeed, RPZ areas do not contain any areas in the nationally defined quintile of the most income deprived (though a section of the city centre covered by RPZ areas is in the most deprived quintile across the WoE).

3.2.3 Children

Figure 3.4 presents the distribution of children (aged under 16) across the impact area and demonstrates that there are few immediate RPZ areas have a high concentration of children, generally having a low concentration of children. Those that do are concentrated at the west and southern edges of Bath.

3.2.4 Young people

Figure 3.5 presents the distribution of young people (aged 16-25) across the impact area and demonstrates that most immediate RPZ areas have a relatively high concentration of young people.

⁴ Dark shading in Table 3.1 denotes impacts and demographic groups that are not linked in Table 2 of TAG A4.2. Light shading denotes impacts and demographic groups that are linked, have been discussed in this report for the study area, but are not material to distributional assessment of the scheme. Only affordability and income distribution is directly related to this scheme – as outlined in 'Screening' (section 2 of this report).

3.2.5 Elderly People

Figure 3.6 presents the distribution of elderly people (aged over 70) across the impact area and shows that the immediate RPZ areas are mixed in terms of their elderly population. The elderly population is primarily concentrated on the peripheral areas of Bath City, outside the RPZ boundaries. That said, there is a concentration of elderly people in a central and eastern areas that falls within.

3.2.6 Disabled People

Figure 3.7 presents the distribution of disability deprivation across the impact area, measured using the Census statistics of people whose day-to-day activities are limited. The map indicates that communities with a high disability ratio are located principally in the centre of Bath.

3.2.7 Ethnic Minorities

Figure 3.8 presents the distribution of ethnic minority populations across the impact area. The map indicates that communities are located principally in the centre of Bath.

3.2.8 Car ownership

Figure 3.9 presents the distribution of households without access to a car or van across the impact area. Clearly the change to residents' parking charges will have no impact on people who do not have a car or van available, though the map indicates that communities are located principally in the centre of Bath.

3.2.9 Dependent children

Figure 3.9 presents the distribution of households with dependent children across the impact area. The map indicates that communities are located principally in the centre of Bath.

3.2.10 Summary of demographic data

Table 3.2 summarises the identification of social groups in the area, with respect to impacts assessed.

Table 3.2: Step 2 Output Summary

Social group & amenities indicators		Affordability	B&NES	England	
Resident population in impact area	Income distribution quintiles	1 (most deprived)	0%	4%	20%
		2	8%	12%	20%
		3	39%	21%	20%
		4	10%	28%	20%
		5 (least deprived)	43%	35%	20%
	Indicator population in the impact area		25,031	188,678	53.01m
Amenities present within the impact area	Schools/nurseries	✓			
	Playgrounds/sports field	✓			
	Parks and open spaces	✓			
	Surgery/Hospital	✓			
	Care homes/day centres	✓			
	Community centre	✓			

Figure 3.2: Concentration of low-income households relative to WoE levels

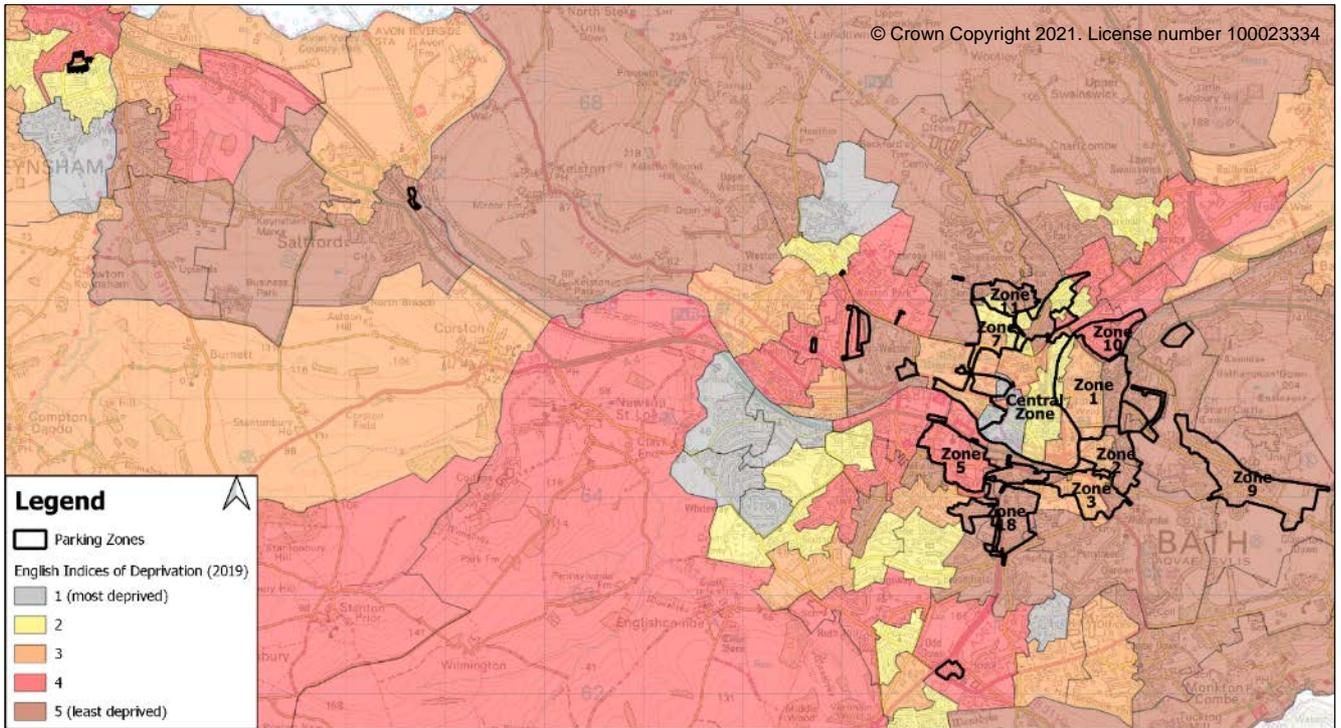


Figure 3.3: Concentration of low-income households relative to national (England) levels

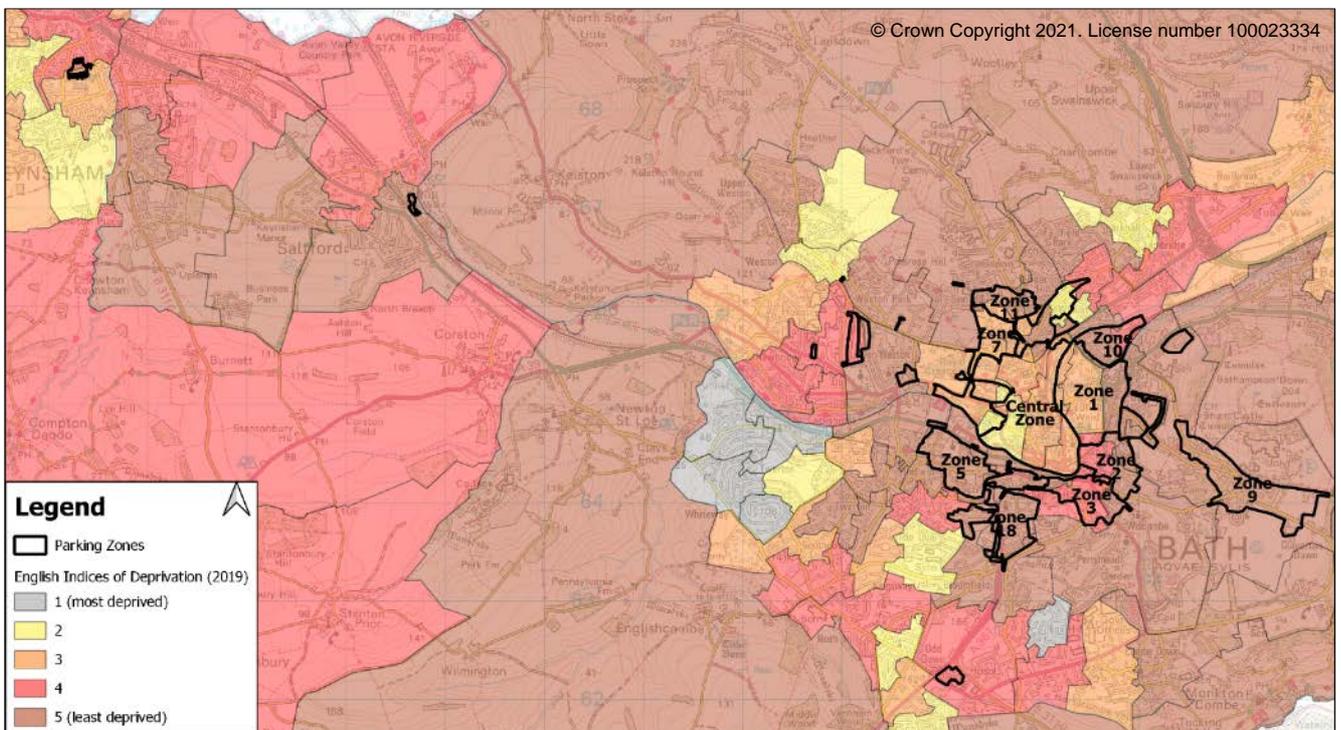


Figure 3.4: Concentration of children (age under 16)

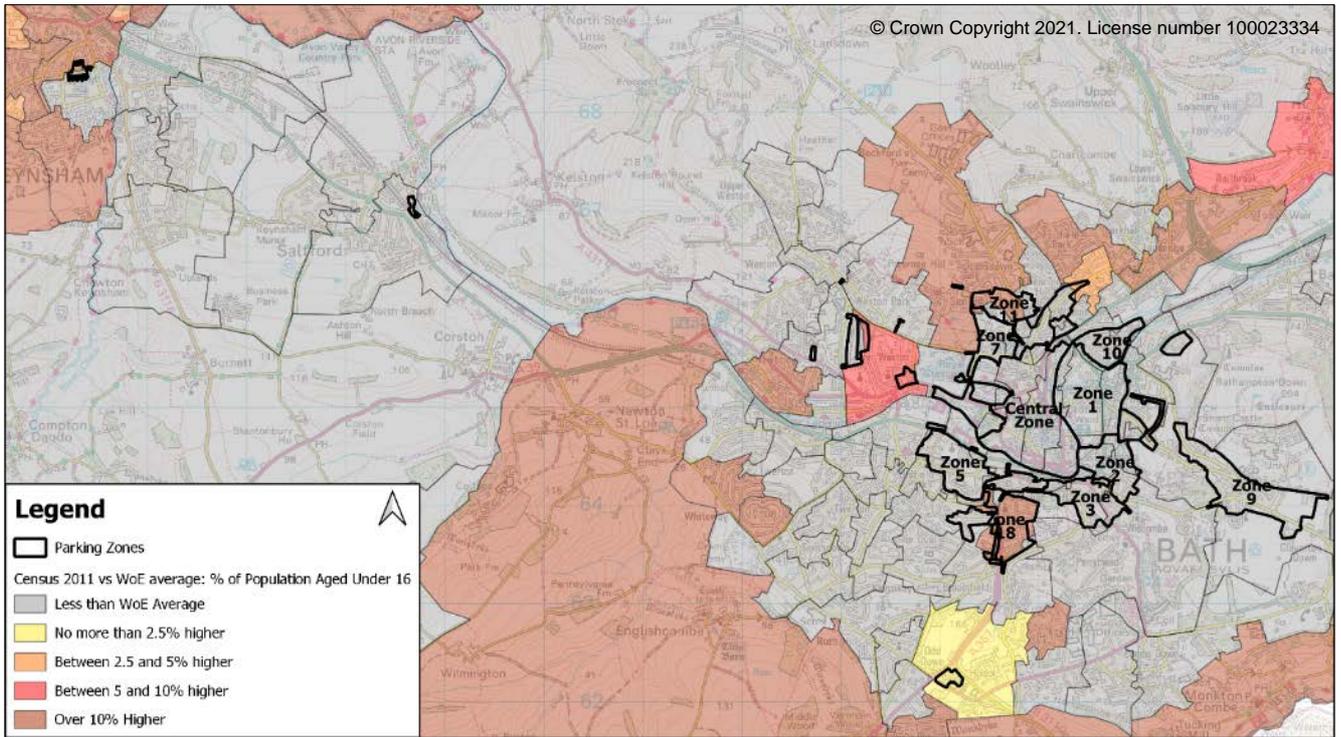


Figure 3.5: Concentration of young people (age 16-25)

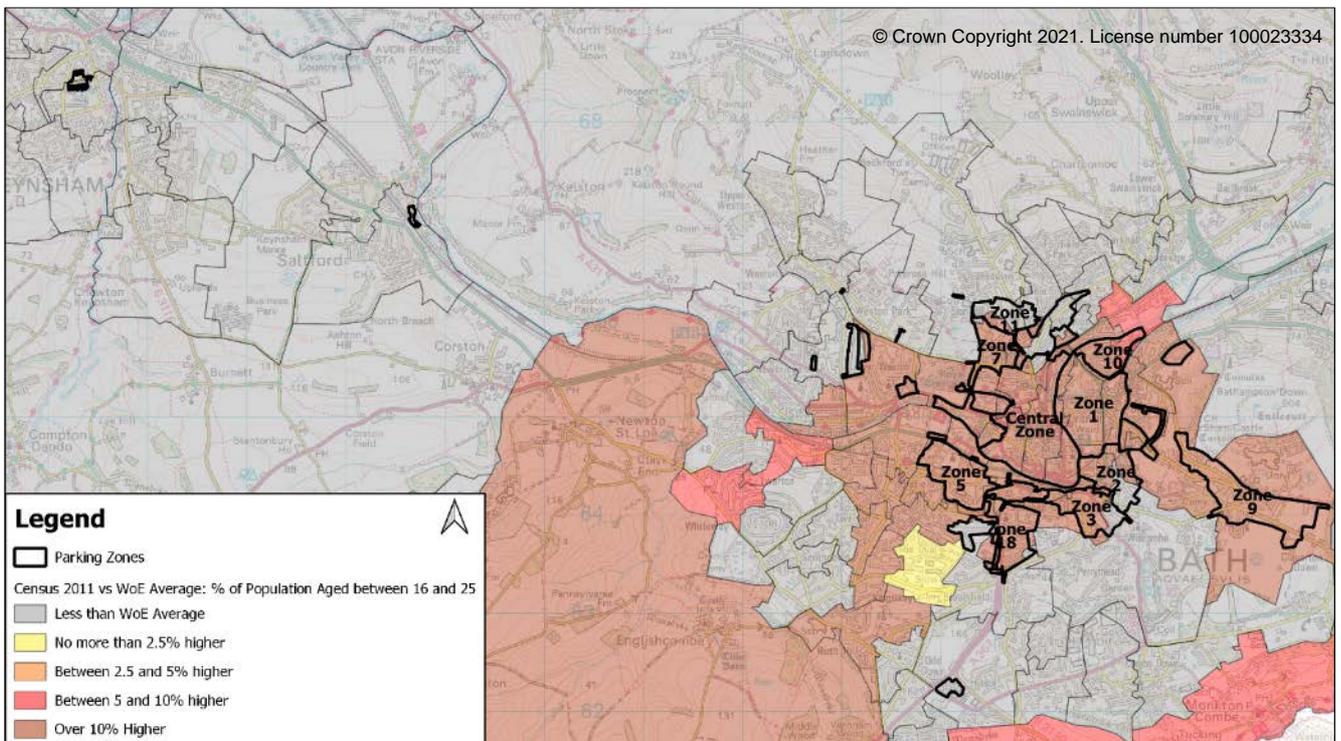


Figure 3.6: Concentration of elderly people (age >70)

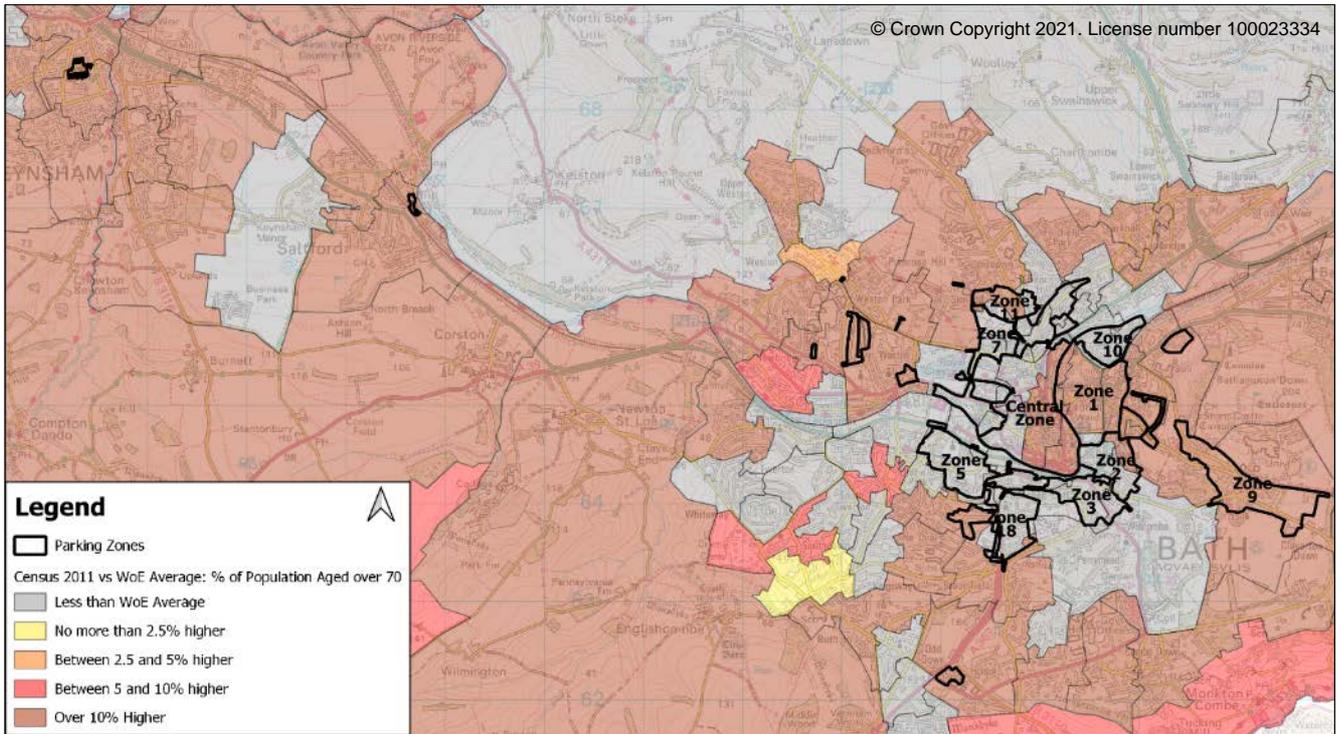


Figure 3.7: Concentration of disabled people

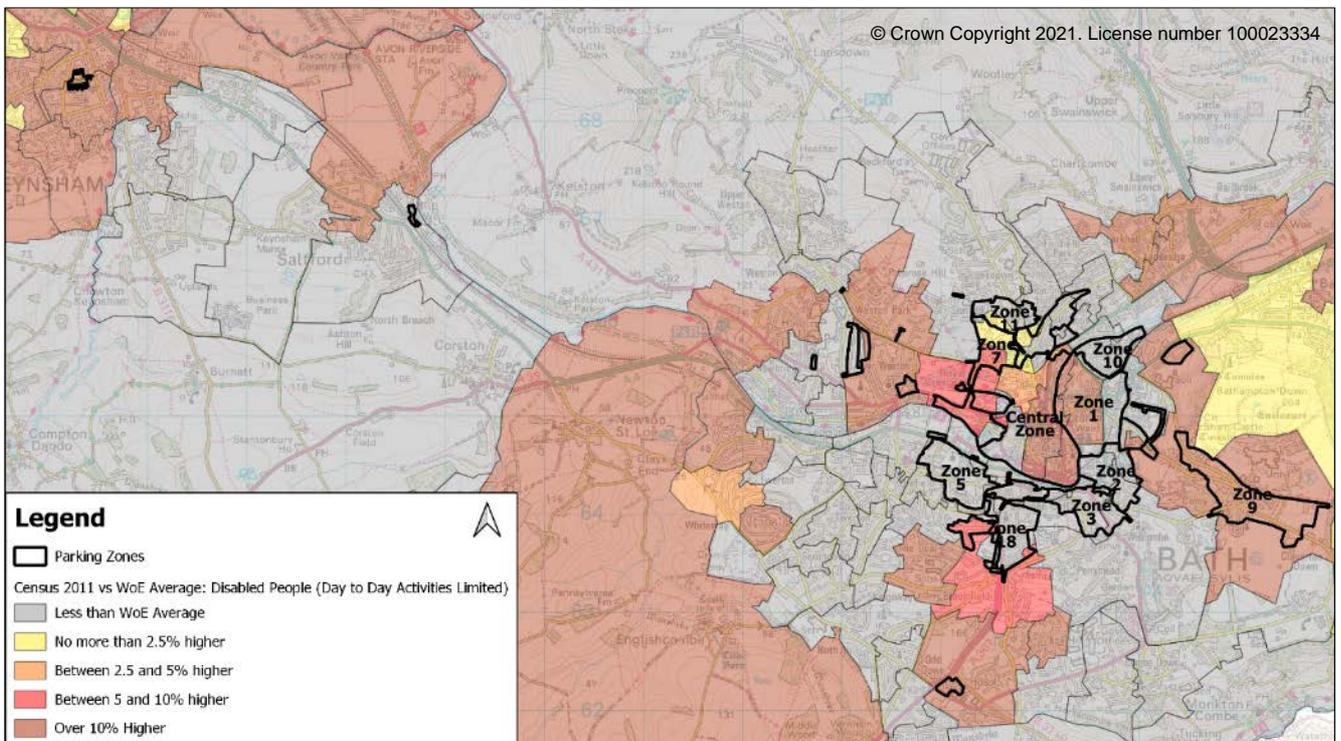


Figure 3.8: Concentration of ethnic minorities

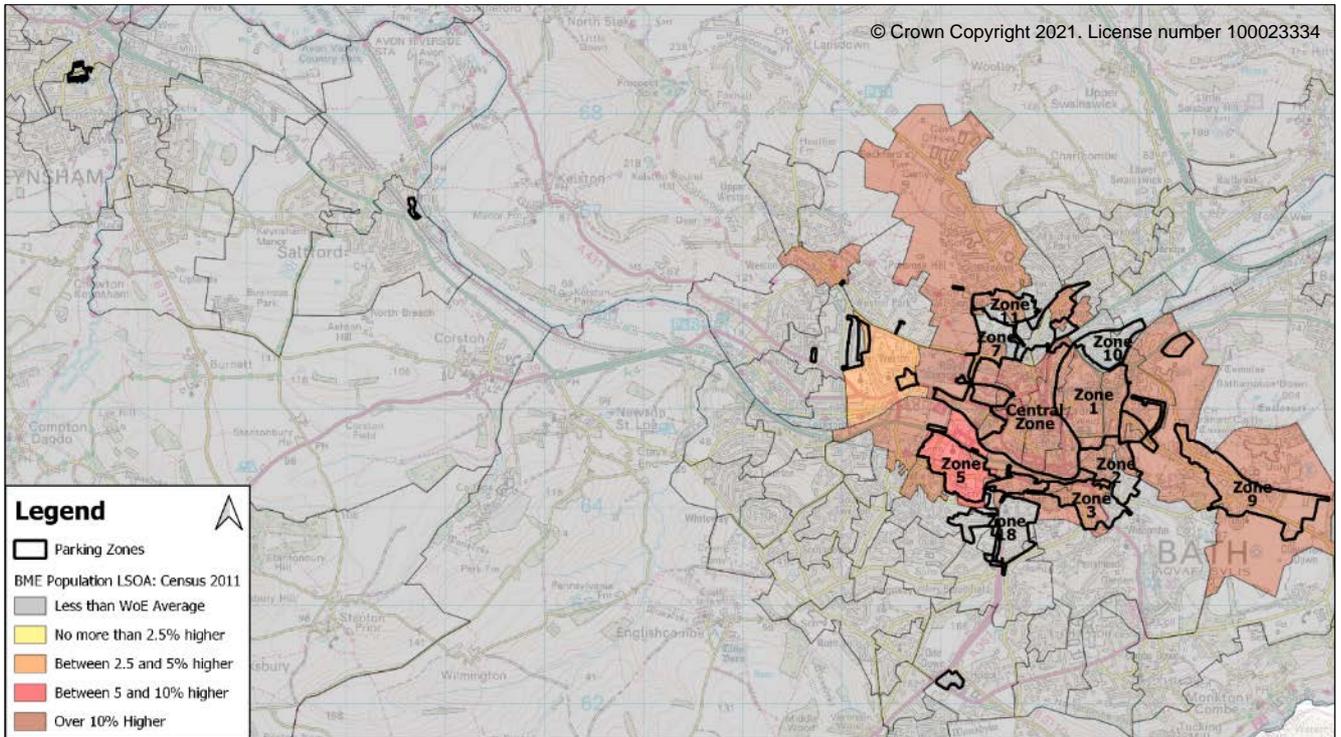


Figure 3.9: Concentration of households with no access to a car or van

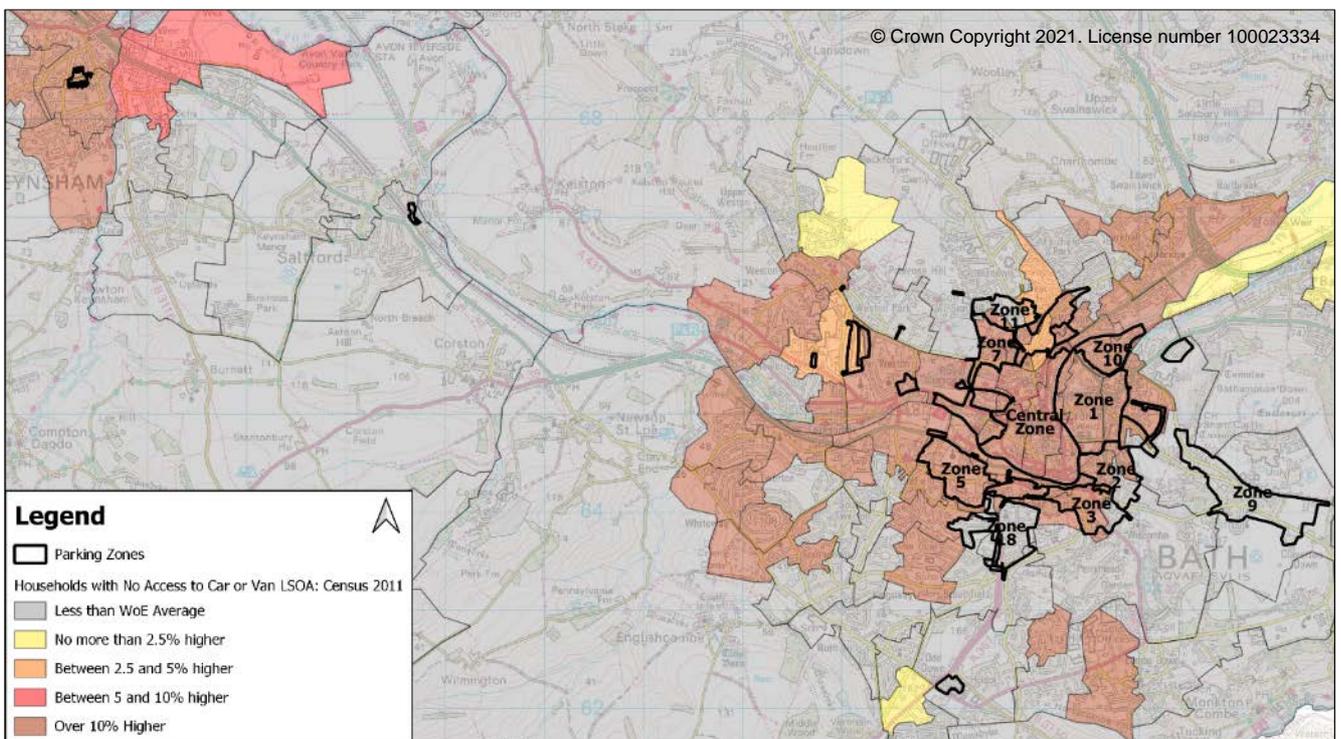
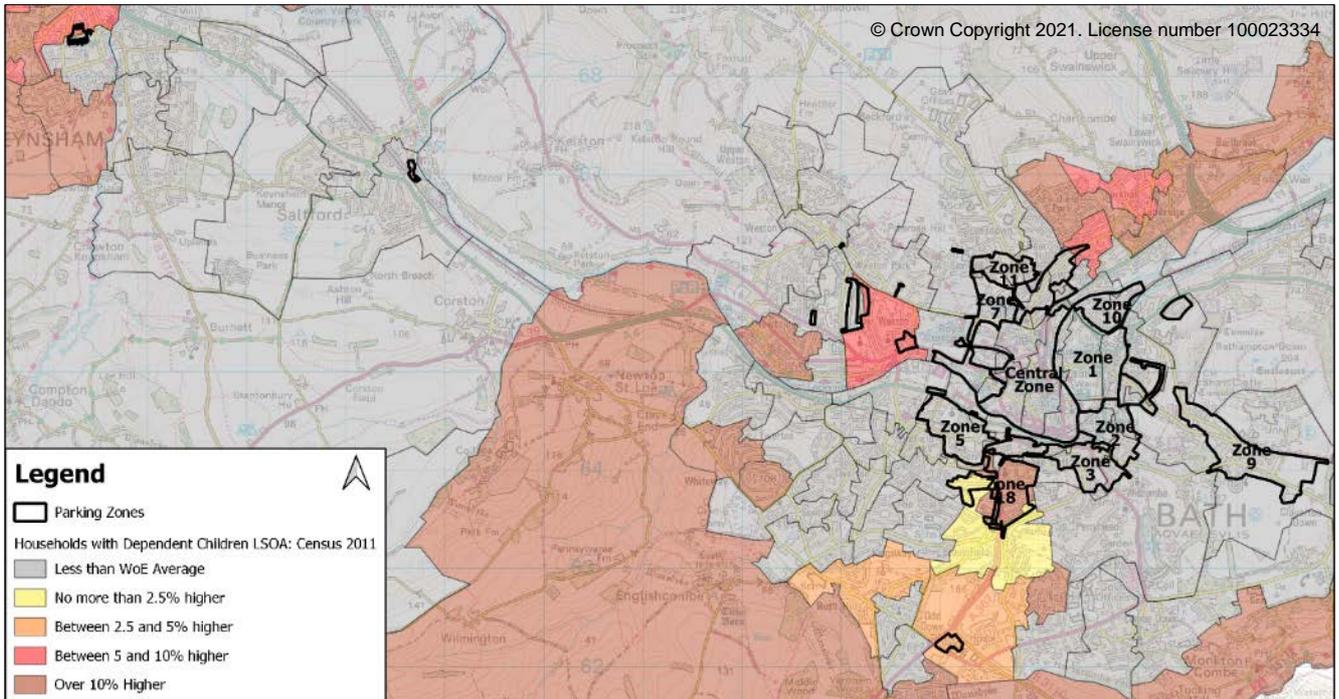


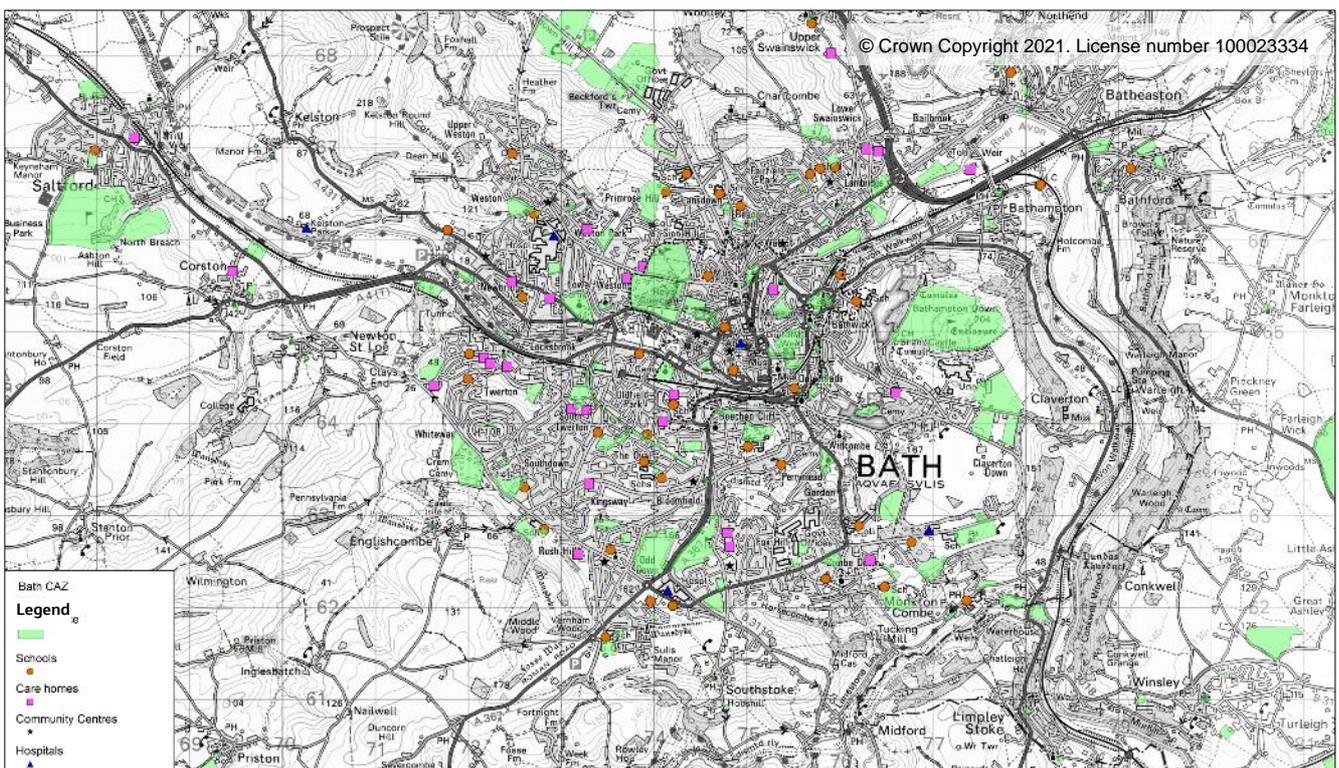
Figure 3.10: Concentration of households with dependent children



3.3 Step 2c: Identification of Amenities in the Impact Area

Figure 3.11 highlights the distribution of amenities and social infrastructure across Bath, for reference, as no trip-making impacts are anticipated and locations of amenities in the study area are not material to the assessment. There are though schools, community centres, care homes and green space all located within the RPZs, and in addition the main retail and employment core of the city is covered by RPZs.

Figure 3.11: Key social infrastructure



4. Step 3: Appraisal

The purpose of this section is to assess whether the impact areas identified in Step 2a are likely to significantly affect the social groups/establishment set out in Step 2b and 2c, and as such determine whether a full appraisal is necessary for each impact.

The only impact that was taken through screening is affordability.

4.1 Affordability

The distribution of the impacts on affordability are taken through to Step 3; this is the only impact considered thus, as outlined in section 2, screening. As outlined in Section 3, the area affected is the population of the RPZs themselves, with commensurate reference to wider B&NES population for reference.

Parking permit costs are set out in Table 4.1, including current and proposed future charging regimes. This indicates that existing prices are £100 for the 1st permit in a household, rising to £160 for the second. The proposed changes to permit costs will introduce a sliding scale of charges based on CO₂ emissions categories or engine capacities. Zero emission vehicles will still be charged for permits, though the price will reduce from current levels. Low emission non-diesel vehicles (up to CO₂ emissions of 111-130 g/km) will see unchanged permit prices; above this level, prices rise with emissions. All diesel vehicles will be subject to supplements on top of the basic charge, meaning that all diesel vehicle owners will experience an increase in permit costs from the current situation. The biggest charge for a 1st vehicle permit is £250 for a pre-2001 registered diesel vehicle over 2951 cc (with £400 for a second similar vehicle).

Table 4.1: Parking permit costs

permit >>	BASE		Increase	Electric & Petrol		Diesel supplement		Diesel TOTAL	
	1 st	2 nd		1 st	2 nd	1 st	2 nd	1 st	2 nd
CO2 emissions (g/km)									
0	£100	£160	50%	£50	£80	£12.50	£20	£62.50	£100
1-50	£100	£160	100%	£100	£160	£25	£40	£125	£200
51-75	£100	£160	100%	£100	£160	£25	£40	£125	£200
76-90	£100	£160	100%	£100	£160	£25	£40	£125	£200
91-100	£100	£160	100%	£100	£160	£25	£40	£125	£200
101-110	£100	£160	100%	£100	£160	£25	£40	£125	£200
111-130	£100	£160	100%	£100	£160	£25	£40	£125	£200
131-150	£100	£160	105%	£105	£168	£26.25	£42	£131.25	£210
151-170	£100	£160	110%	£110	£176	£27.50	£44	£137.50	£220
171-190	£100	£160	115%	£115	£184	£28.75	£46	£143.75	£230
191-225	£100	£160	120%	£120	£192	£30	£48	£150	£240
226-255	£100	£160	125%	£125	£200	£31.25	£50	£156.25	£250
Over 255	£100	£160	130%	£130	£208	£32.50	£52	£162.50	£260
Engine capacity (pre-2001)									
0-1550	£100	£160	125%	£125	£200	£31.25	£50	£156.25	£250
1550-1950	£100	£160	150%	£150	£240	£37.50	£60	£187.50	£300
1951-2950	£100	£160	175%	£175	£280	£43.75	£70	£218.75	£350
Over 2951	£100	£160	200%	£200	£320	£50	£80	£250	£400

Applying these charges to existing permit holders (assuming there are no changes in vehicles the permits apply to in the first instance) indicates that just over 30% of permits would remain the same price in the future, and 1% of permits would be cheaper. Others would increase, with almost 65% increasing cost by up to 50%, and the remainder more than this.

This is illustrated by RPZ area in Table 4.2.

Table 4.2: Parking permit cost changes – for selected zones⁵

Zone	Proportion of permits for which the cost would...			
	...reduce	...stay the same	...increase up to 50%	...increase more than 50%
Central Zone	1.3%	26.0%	67.3%	5.2%
Zone 1	0.6%	29.2%	66.2%	4.0%
Zone 2	0.9%	32.8%	62.5%	3.4%
Zone 3	1.6%	31.4%	61.2%	5.5%
Zone 4	0.6%	35.2%	58.6%	5.6%
Zone 5	0.3%	38.9%	58.9%	1.9%
Zone 6	0.6%	30.9%	64.0%	4.5%
Zone 7	1.0%	30.9%	64.2%	3.6%
Zone 10	0.4%	28.2%	67.5%	3.8%
Zone 11	3.5%	24.3%	66.1%	5.7%
Zone 15	0.9%	36.5%	60.0%	2.4%
Zone 18	0.6%	29.9%	64.8%	4.8%
ALL	1.0%	30.2%	64.4%	4.3%

Note: figures do not all sum to 100%, as a result of rounding and a small number of unknown vehicle types in source data

As such, there is a clear increase in the cost of car ownership for the majority of car owning people living in the RPZ areas, which affects affordability. The pattern of cost changes is broadly similar across the individual RPZ areas, and also broadly similar to the total of all permits across all zones, suggesting there is not a significant difference in the private permitted vehicle fleet across the RPZ areas.

There is no direct mitigation for this proposal, though car owners could mitigate cost increases in the medium to longer term by relinquishing and/or replacing the vehicles that incur the higher permit charges. This is, in effect, a key anticipated outcome of the policy, to encourage ownership, and hence also use, of less polluting cars in the permitted areas. Demographic analysis in section 3 indicates that car ownership is already lower than regional averages in the RPZ areas within B&NES.

To understand the change in permit charges across the city more fully, and assess the distributional impact on affordability, the RPZ areas and vehicles currently listed in the B&NES database as having permits in the various RPZ areas, have had their locations cross-referenced with Index of Deprivation (ID 2019) income deprivation statistics for LSOAs. This allows identification of income deprivation in RPZ areas in quintiles of deprivation statistics from 'most' to 'least' income deprived, and more pertinently the permits located in these areas, from which changes in cost can be cross-referenced with income deprivation quintiles. This is a key aspect of the distributional assessment of affordability impacts, in that this is seeking to understand if there are any areas of income deprivation that are disproportionately impacted by the proposals compared to the distribution of population in these areas.

⁵ Selected zones – only show figures for zones where there are more than 100 permits in the source data

Table 4.3 illustrates the distributional impacts of affordability of permit changes. In the first instance, it is notable that income deprivation in the RPZ is not reflective of B&NES as a whole. No areas in the RPZs fit into the most deprived quintiles (across England), although some 4% of the population of B&NES are. More people are in the least income deprived quintile in the RPZ areas than B&NES, though far fewer proportionally in the 4th quintile and significantly more in the middle (3rd) quintile.⁶

Table 4.3: Distributional impacts assessment– affordability

	IMD Income Domains (quintiles)					Total
	most deprived	←	→	least deprived	
	1	2	3	4	5	
Permit costs reducing	-	5	26	6	23	60
...share of reducing permit costs	-	8.3%	43.3%	10.0%	38.3%	100%
Permit costs unchanged	-	150	700	139	838	1,827
...share of unchanged permit costs	-	8.2%	38.3%	7.6%	45.9%	100%
Permit costs increasing	-	300	1,741	301	1,820	4,162
...share of increasing permit costs	-	7.2%	41.8%	7.2%	43.7%	100%
Net impact (increase/decrease)	-	145	1,015	156	959	2,275
...share of net impact	-	6.4%	44.6%	6.9%	42.2%	100%
Population in impact area (RPZs)	-	1,992	9,648	2,637	10,754	25,031
...share of pop. In impact area	-	8.0%	38.5%	10.5%	43.0%	100%
Share of total population In B&NES	4.0%	11.9%	21.0%	27.9%	35.2%	100%
Distributional Assessment ⁷	-	x	xxx	x	xx	

Comparison between the net impact on permit charges across the RPZs indicates that the distributional impact of affordability is slightly uneven compared to the distribution of income deprivation. Increases in permit cost have a lower proportional impact on the more deprived quintiles (1 and 2), though proportionally more permit holders will see an increase in cost in the middle quintile (3) than there are residents, and far lower proportionally in quintile 4; the least deprived quintile (5) sees a proportional share of change.

Overall therefore, while the distributional assessment of affordability indicates a slightly uneven appraisal, it is the middle/upper quintiles (3 & 4) that are inconsistent with the proportions of population in those quintiles. Importantly, given that affordability is intrinsically linked with income deprivation in the distributional impact appraisal, the most income deprived quintiles (1 & 2) are less proportionally impacted compared to the proportion of population in those quintiles.

⁶ It should be noted that this could be at least partly related to the granularity of the source data for income deprivation, in comparing LSOAs for ID 2019 to the RPZ areas themselves. Unsurprisingly the boundaries do not exactly match in many (if any) locations, and there is sometimes a reasonable disparity between sizes of LSOAs and RPZ areas. As such, interpretation of the intersections has been required,

⁷ **x** = slight: adverse impact; proportion of the population impacted is smaller than the proportion of the population of the income quintile overall
xx = moderate: adverse impact; proportion of the population impacted is broadly in line with proportion of the population of the income quintile
xxx = large: adverse impact; proportion of the population impacted significantly greater than proportion of the population of the income quintile

5. Summary

A matrix of distributional impact assessment is presented in Table 5.1.

Table 5.1: Distributonal Impact – appraisal matrix

	Distributonal impact of income deprivation					Are impacts distributed evenly?	Key impacts - Qualitative statements
	1 (most deprived)	2	3	4	5 (least deprived)		
User benefits							Not assessed.
Noise							Not assessed.
Air quality							Not assessed.
Affordability	-	x	xxx	x	xx	x	The net impact on permit charges across the RPZs indicates that the distributonal impact of affordability is slightly uneven compared to the distribution of income deprivation. Importantly though, given that affordability is intrinsically linked with income deprivation, the most income deprived quintiles (1 & 2) are less proportionally impacted compared to the proportion of population in those quintiles. The impact on the upper (4) and middle (3) quintiles are the most uneven, being under and over-represented respectively; impact on the least deprived quintile is proportionate to its share of population.
Accessibility							Not assessed.

Impact	Social groups						User groups				Qualitative statement (including any impact on residential population AND identified amenities)
	Children & young	Older people	Carers	Women	Disabled	BME	Peds	Cyclists	Motor-cyclists	Young male drivers	
Noise											Not assessed.
Air Quality											Not assessed.
Accidents											Not assessed.
Security											Not assessed.
Severance											Not assessed.

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Appendix 9 – Distribution of vehicles impacted by higher permit charge across local deciles

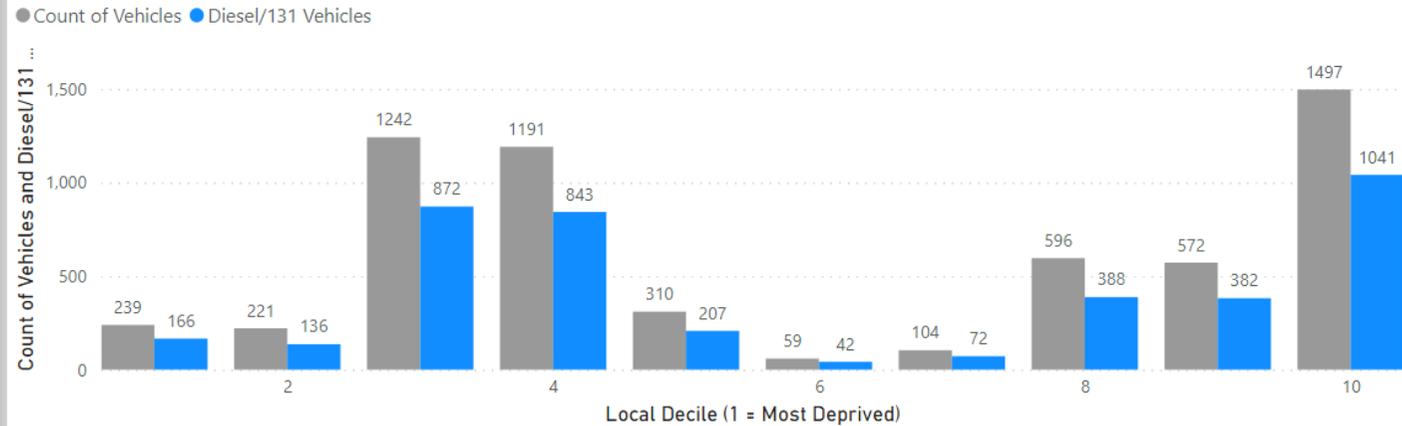
Emissions data from permit vehicles against local deprivation scores

Local Decile is a 1 - 10 deprivation score, where 1 refers to a local area (LSOA) with most deprivation and 10 with least deprivation.

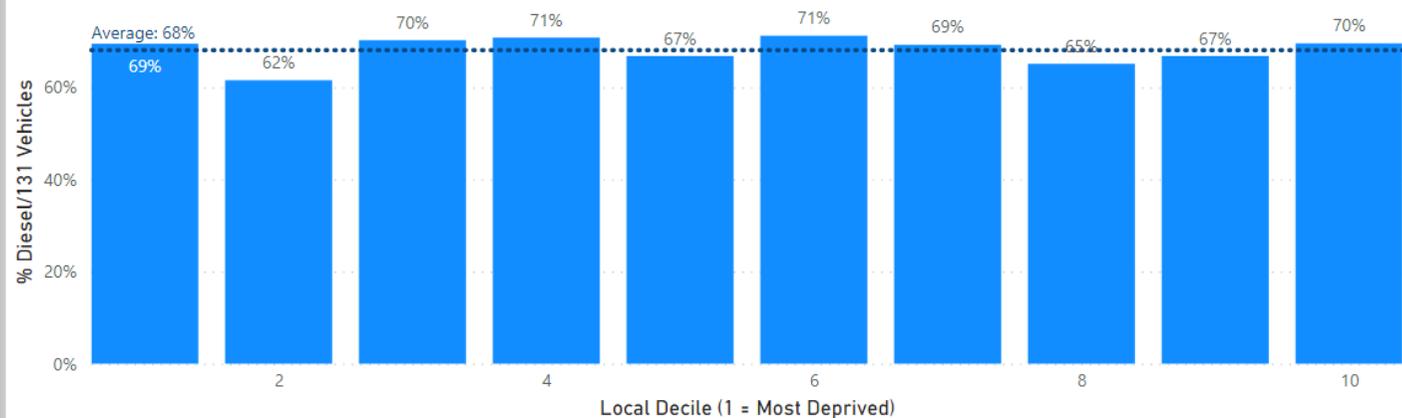
Number of vehicles by deprivation

Local Decile (1 = Most Deprived)	Vehicles	Diesel/131 Vehicles
1	239	166
2	221	136
3	1242	872
4	1191	843
5	310	207
6	59	42
7	104	72
8	596	388
9	572	382
10	1497	1041
Total	6031	4149

Number of Vehicles and Diesel/131 Vehicles by Local Decile (1 = Most Deprived)



% Diesel/131 Vehicles by Local Decile (1 = Most Deprived)



69%

Diesel/131 Vehicles against all vehicles

Figure 1: Analysis of vehicles affected by the new charges

This analysis is based on vehicle emissions data and postcode against Indices of Deprivation (2019). Only vehicles included within the 69% affected by an increased permit charge are included in the two charts in Figure 1. This includes all diesel fuelled vehicles and all petrol vehicles with CO2 emissions above 131g/km.

Emissions data from permit vehicles against local deprivation scores

Local Decile is a 1 - 10 deprivation score, where 1 refers to a local area (LSOA) with most deprivation and 10 with least deprivation.

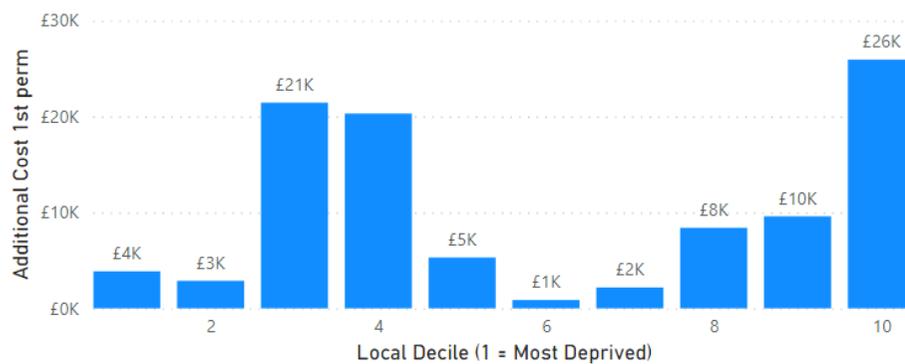
Total additional cost by banding and local decile (1=most deprived)

Banding	1	2	3	4	5	6	7	8	9	10
01: 0	£-200	£-50	£-800	£-500	£-150	£-50	£-100	£-50	£-200	£-850
02: 1-50		£0	£0	£0	£0	£0	£0	£0	£0	£0
03: 51-75	£0	£0	£0	£0	£0			£0	£0	£0
04: 76-90	£25	£25	£100	£350	£75	£25	£25	£125	£50	£225
05: 91-100	£50	£125	£600	£625	£250	£50	£0	£250	£225	£375
06: 101-110	£125	£225	£750	£1,250	£225	£75	£75	£500	£475	£1,200
07: 111-130	£325	£375	£2,075	£2,125	£575	£100	£50	£1,175	£1,050	£2,950
08: 131-150	£591	£524	£3,509	£3,354	£824	£206	£274	£1,680	£1,635	£4,730
09: 151-170	£763	£475	£3,333	£3,158	£675	£118	£353	£1,348	£1,175	£4,283
10: 171-190	£455	£221	£2,913	£2,413	£589	£45	£323	£868	£986	£2,971
11: 191-225	£330	£280	£2,330	£2,140	£670	£20	£340	£810	£1,270	£3,480
12: 226-255	£188	£56	£1,544	£1,038	£406	£25	£56	£106	£294	£1,069
13: 256+	£185	£153	£613	£825	£153		£280	£185	£213	£793
14: Eng. Cap. 0-1550	£50		£413	£313	£50	£25		£175	£100	£231
15: Eng. Cap. 1551-1950	£275	£150	£1,150	£788	£263		£88	£188	£525	£1,050
16: Eng. Cap. 1951-2950	£700	£313	£2,619	£2,188	£700	£238	£313	£938	£1,594	£3,081
17: Eng. Cap. 2950+			£300	£250			£100	£100	£200	£350

Average additional cost for affected vehicles by banding and local decile (1=most deprived)

Banding	1	2	3	4	5	6	7	8	9	10
17: Eng. Cap. 2950+			£100	£125			£100	£100	£100	£117
16: Eng. Cap. 1951-2950	£100	£104	£105	£104	£100	£119	£104	£104	£100	£103
15: Eng. Cap. 1551-1950	£69	£50	£68	£66	£88		£88	£63	£88	£70
14: Eng. Cap. 0-1550	£25		£29	£31	£25	£25		£25	£25	£29
13: 256+	£46	£38	£41	£39	£38		£56	£46	£35	£38
12: 226-255	£38	£56	£41	£36	£41	£25	£56	£35	£37	£45
11: 191-225	£28	£35	£31	£30	£34	£20	£31	£34	£36	£33
10: 171-190	£30	£25	£27	£27	£27	£15	£32	£28	£27	£28
09: 151-170	£17	£15	£19	£20	£23	£13	£22	£18	£21	£21
08: 131-150	£12	£11	£13	£13	£13	£14	£15	£11	£12	£14
07: 111-130	£6	£6	£7	£8	£8	£8	£2	£7	£7	£8
06: 101-110	£7	£8	£7	£9	£6	£8	£6	£7	£6	£8
05: 91-100	£4	£9	£9	£9	£9	£25	£0	£7	£8	£6
04: 76-90	£6	£6	£8	£13	£15	£25	£25	£18	£7	£11
03: 51-75	£0	£0	£0	£0	£0		£0	£0	£0	£0
02: 1-50	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
01: 0	£-50	£-50	£-50	£-50	£-50	£-50	£-50	£-50	£-50	£-50

Total additional cost by banding and local decile (1=most deprived)



Average additional cost for affected vehicles by local decile (1=most deprived)



Figure 2: Total and average increase in charges for affected vehicles by CO2 emissions band against Lower Super Output Area (Indices of Deprivation (2019))

Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Cabinet	
MEETING/ DECISION DATE:	20th July 2022	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3289
TITLE:	Investment in Neighbourhood Services from 2022	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
None		

1 THE ISSUE

- 1.1 Neighbourhood Services (highways maintenance, waste, cleansing, fleet, parks & grounds) has delivered significant cashable service efficiencies during the past 10 years. This has resulted in a risk-based approach to delivery of a number of functions and in some cases, decisions have been taken to stop services. The Council has invested additional funding in street cleansing in 21/22 and would like to invest further in Neighbourhood Services to improve standards and reinstate some services.
- 1.2 This report provides options for future investment in these high-profile front-line services for 22/23. The Climate Emergency and Sustainability Policy Development and Scrutiny Panel (CES PDS panel) has been consulted on these proposals and will be further engaged as the proposals are developed to be considered through the budget setting process.
- 1.3 The Cabinet also is committed to immediately stopping the use of glyphosate to treat street weeds throughout the district on a permanent basis. One of the proposals include investment into mechanical and manual removal until other viable treatment solutions can be identified.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Agree that the Council will no longer use glyphosate to control street weeds and will prioritise funding to mechanical and manual weed removal for street weeds in 22/23 whilst continuing to research viable alternatives.
- 2.2 Agree the areas to be considered within the Neighbourhood Services portfolio for further investment as a 12-month pilot, making a commitment against the council's £2m Covid contingency budget that has been earmarked to manage council priorities and backlogs on operational services. This money to be released from 2022/23. At the completion of the pilot, the outcomes will be reviewed to ensure they deliver the necessary service improvement and considered as part of the council's financial planning processes for long term service investment in the 23/24 budget.
- 2.3 The Cabinet is asked to take into account issues raised by the Scrutiny Panel when they report back on their findings.
- 2.4 Delegate authority to the Director of Place Management, in consultation with the Cabinet Member for Neighbourhoods, to develop the most operationally effective and value for money delivery arrangements.

3 THE REPORT

3.1 The neighbourhood services covered by this report are high profile in our communities and how we deliver these impacts upon the reputation of the council. Many are statutory in nature and constitute a mix of proactive and reactive services. In addition, these are high volume services both in respect of service deliver and the number of customer enquiries/contacts. The table below provides some detail on scope:

Highways	Parks	Waste
<p>1200 kms of roads</p> <p>17,000 streetlights</p> <p>100 sets of traffic signals</p> <p>25,000 road gullies</p> <p>2000 structures</p> <p>1040 kms Footways and footpaths</p> <p>11000 signs and bollards</p> <p>9 gritting routes totalling 268 miles of road</p>	<p>270 Parks and Open Spaces managed</p> <p>6 Heritage Parks</p> <p>59 Play Areas</p> <p>28000 Trees & 7 Woodlands (to date)</p> <p>24 Allotments</p> <p>80000 plants grown each year</p>	<p>Waste and recycling collections provided to 86,435 households</p> <p>Every 4 weeks over half a million refuse and recycling collections take place</p> <p>870 business waste customers serviced</p> <p>Cleansed over 1300 miles of highway</p> <p>Litter picked main road litter twice a year</p> <p>Emptied litter bins two/three times a week or over 90,000 times a year</p>

3.2 In common with every local Council, this Council has had to make cashable efficiencies to service provision in order to balance its budgets over the last 10 years. Services such as washing and replacement of highways signs have been stopped and there has been a focus on a risk based to approach to service delivery and maintaining statutory minimum in some areas.

3.3 The Council is mindful of its core objective to Improve People's Lives, the principles of prioritising it's declared climate and ecological emergencies and giving people a bigger say.

3.4 The Council has this year invested in increasing street cleansing activity, which has resulted in improvements to response times and service delivery improvements. Additional activity includes, main road litter picking in rural areas and weekly visits to urban wards. Examples of other options that may be included in the pilot are as follows:

- Mechanical and manual removal of street weeds – stopping the use of glyphosate and working with communities to manage street weeds in some locations.
- Street cleansing – More proactive cleansing. Visiting more areas more frequently, litter picking main roads more frequently, Improved response times and increased visits to areas on routine schedules including deep cleans of channels and gulleys.
- Graffiti removal –improving response times and enhancing the service
- Enforcement – continued investment in enforcement against fly tipping and litter dropping and other activity that breaches relevant environmental law.
- Gulley emptying – increasing the frequency of emptying
- Highway signs and street nameplate – Cleaning signs & cutting vegetation from them more frequently, replacing worn out signs and repainting signs.
- Highway road markings – more frequent painting of worn out road markings
- Improvement to customer feedback on issues raised through our website for attention, improving our digital systems and information for residents about issues affecting their specific areas
- Enhanced response times to road and pavement maintenance

3.5 This investment would also provide an opportunity to pilot area-based delivery mechanisms, working in consultation with ward councillors and town and parishes councils to assess costs and bring forward longer term plans.

4 STATUTORY CONSIDERATIONS

- 4.1 The Council is the statutory Highways Authority, Waste Collection and Waste Disposal Authority and Principle Litter Authority and is governed by legislation that dictates statutory powers and standards that must be upheld.
- 4.2 The proposals detailed will raise standards above the Council's statutory minimum service provision in the areas listed.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 It is estimated that sums of up to £950K revenue would address the areas detailed to give a visible improvement in standards. This funding would be for plant, equipment, labour and contract payments for the 12-month pilot
- 5.2 These additional services will be funded from a commitment against the council's £2m Covid contingency budget that has been earmarked to manage council priorities and backlogs on operational services. This money to be released from 2022/23. This is a one off pilot and any further funding would need to be considered as part of the council's financial planning processes.
- 5.3 The Council's Medium Term Financial outlook currently forecasts a further revenue savings requirement of £12.6m for 2022/23 in order to set a balanced budget. Any permanent growth in the Neighbourhood Services portfolio would need to be offset with savings in other service areas, and this will need to be considered as part of the budget process for 2023/24 and future years.

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making, risk management guidance.

7 EQUALITIES

- 7.1 Equalities impact assessments will be completed for all proposals considered in detail through the budget process.

8 CLIMATE CHANGE

- 8.1 In determining investment in the areas detailed above due regard will be paid to reducing the carbon impact of our activities and plant and equipment using fossil fuels will be reduced to the minimum possible. Alternatives will be procured
- 8.2 The proposal to stop the use of glyphosate in the management of street weeds will contribute to our work in response to the ecological emergency, significantly reducing the use of chemicals in our operations and providing greater flexibility in how street weeds/pavement plants are managed.

9 OTHER OPTIONS CONSIDERED

- 9.1 This report details areas for consideration through the Council's budget process. Other areas will come forward through the CEPD Scrutiny Panel work, and through the process itself.

10 CONSULTATION

This report has been consulted with the S 151 Officer, Monitoring Officer, and Cabinet members. It has already been agreed to engage Scrutiny members and there will be engaged of ward councillors and Town and Parish Councils.

Contact person	Chris Major: 01225 3943231
Background papers	
Please contact the report author if you need to access this report in an alternative format	

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Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING	20 July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3306
TITLE:	Waste Infrastructure relocation & modernisation programme	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
None		

1 THE ISSUE

1.1 The Waste Infrastructure programme includes the development of previously acquired land at Pixash Lane, Keynsham, to relocate and consolidate Council waste & recycling operations and modernise the existing public Recycling Centre there. Significant progress has been made in recent years, and final approval of capital is now required in order to progress into the final stages of construction and enable relocation in early 2023.

1.2 Proposals for re-providing household waste and recycling centres in Bath continue to be developed and appraised so that Bath residents will have uninterrupted access to recycling centres local to them, aligned with the Council's climate and nature priorities. The Council is committed to keeping the public recycling centre at Midland Road open until an alternative is in place for residents of Bath. A supplementary paper outlining more detail on providing at least one recycling centre in the city of Bath is intended to be tabled at the meeting.

2 RECOMMENDATION

The Cabinet is asked to:

2.1 Fully approve the total capital of £29.9m needed to deliver the construction phase, in order to complete and relocate according to programme in early 2023. This requires an uplift of £13.6m on the current provisional programme item of £16.3m, with the additional borrowing costs implied of £522k to be funded from the revenue budget contingency.

2.2 Agree that further development and appraisal studies are progressed on options proposed for waste & recycling centres in Bath, in order to deliver agreed facilities by 2023. This will become a new and emerging capital item to be considered for approval in the Council's Budget Setting for 2022/23.

3 THE REPORT

3.1 The depot consolidation and modernisation programme is a longstanding council project, to create purpose-built infrastructure to increase recycling and reuse opportunities for our residents, and is required for the council to fulfil its statutory obligations with respect to waste management services. It is intended that this site be operational in 2023 for our operational functions.

This centralised operational depot, the Keynsham Recycling Hub, also creates opportunities to design and construct an operational facility which incorporates key council objectives, under the Climate and Nature Emergency, to reduce and mitigate carbon emissions. Full details are publicly available and outlined in the planning application which is due to be considered at a future Planning Committee. This has been subject to extensive public consultation.

3.2 The provision of new facilities provides enhanced capacity for the future housing growth within the district supporting our policies for sustainable new homes to meet local needs and deliver in line with national housing trajectories.

3.3 The vacation of the current Midland Road depot releases brownfield land to build new homes, including affordable housing, and gains the benefit of Homes England grant funding to help delivery. We will ensure there will no interruption in public recycling centre provision in the city of Bath and will keep the public recycling centre here open until alternatives are in place.

3.4 Residents' experiences will be enhanced when using the new public Reuse and Recycling Centre at Keynsham. The site includes modern staff welfare and operational facilities to allow new ways of working to improve operational efficiencies and consistency of services to residents.

3.5 The new site will increase Highways' salt storage capacity to Department for Transport guidelines and enable more efficient Winter service operations for the Bath and Keynsham road networks.

3.6 Road improvements and alterations to Worlds End Lane, Pixash Lane and the A4 Bath Road, help facilitate future Transport planning infrastructure objectives to address traffic congestion and increase pedestrian and cycle routes.

3.7 The vehicle workshop for legal compliance including servicing, repairs & maintenance of the Council's vehicle fleet, will ensure roadworthy and reliable vehicles to increase service consistency to residents. This workshop will also be open to the public.

3.8 In summary, the proposed consolidated depot, incorporates purpose-built facilities for: A new public Reuse and Recycling Centre (RRC) including a shop for reuse items, Material Recovery Facility (MRF), Waste Transfer Station (WTS), a facility for small traders, Transfer Station (TTS), Fleet Maintenance and a public MoT & servicing centre, Street Cleansing, Park and Grounds

Maintenance (tbc), Highways Winter Service satellite and extra salt storage facility.

- 3.9 Land assembly was completed in 2019, and the delivery programme has progressed to submission of a full planning application in January 2021. Demolition of existing redundant buildings has been completed earlier this year, and the procurement of a construction contractor began its first stages in June 2021.
- 3.10 Funding was committed to take the project up to the award of the construction contract. The additional funding must be allocated to ensure the contractor can be appointed. A detailed technical survey and development work has been carried out, external QS cost plans have been created and updated at each stage to inform the capital allocation now required.

4 STATUTORY CONSIDERATIONS

- 4.1 The council is the Waste Collection and Disposal Authority with statutory responsibilities under the Environmental Protection Act (1990). Our waste and recycling infrastructure needs to be redeveloped in line with forecast growth in population and households detailed in the core strategy, and to adapt to further changes in waste, environmental and health and safety legislation.
- 4.2 The government's Environment Bill 2020 sets out how it plans to protect and improve the natural environment in the UK; it is making its way through Parliament this year. It has been prepared through consultations with the public on numerous measures, including environmental governance; the clean air strategy; biodiversity net gain; trees; conservation covenants; extended producer responsibility for packaging; increasing recycling quality and levels; a Deposit Return Scheme for drinks containers. Other elements that may have significant implications for local authority waste & recycling services are consistent recycling services across the country, extended food and garden waste collections and tackling waste crime.
- 4.3 The site will be operated in accordance with an Environmental Permit issued by the Environment Agency. The permit will only be granted once the Environment Agency are satisfied that the operations on site will not cause a nuisance to any nearby receptors. All operations will be carried out in strict accordance with the permit and any compliance issues will be dealt with through enforcement from the Environment Agency.
- 4.4 The waste & recycling industry is high-risk in health & safety terms, and the site will deliver suitable operational buildings and work areas where compliant HSE working practices can be fully implemented and maintained to keep our staff and the public safe.
- 4.5 Our use of vehicles is heavily regulated. All council vehicles, from 3.5t GVW upwards, are controlled through our Operators licence, from the Traffic Commissioner who is responsible for the licensing and regulation of those who operate heavy goods vehicles, buses and coaches, working with the DVSA, on driver testing and other traffic & road safety matters.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 Approved Waste Relocation Budgets to date are £7.644m as follows:-

	£m	Decision Reference
Street Cleansing Relocation	0.858	E2849, E2940
Pixash Lane – Land Acquisition	3.728	E2891, ODD Aug 18
Project Plan & Design	2.604	E3131, E2849
Pixash Land Demolitions	0.255	ODD Dec 20
Total	7.445	
<u>Funded by :-</u>		
Borrowing	4.576	
HE Grant	1.491	
CIL / S106	1.378	
Total	7.445	

5.2 The forecast amounts for the scheme delivery are £29.898m, profiled by financial year along with associated funding. This is an uplift from the current provisional capital of £16.262m.

	21/22 £m	22/23 £m	23/24 £m	Total £m
Construction, Equipment and Passenger Transport / Taxi Licensing relocations	9.629	19.625	0.644	29.898
<u>Funded by</u>				
Borrowing	4.570	19.625	0.644	24.839
HE Grant	4.509			4.509
CIL	0.550			0.550
Total	9.629	19.625	0.644	29.898

The costs of construction have been assured by a Cost Consultant and are subject to the current tender process. Cost increases have been due to complex ground conditions, the extent of biodiversity net gain needs, highways works and detailed design & development reports.

5.3 The net revenue growth required of the proposals by financial year

	To Date £'000	21/22 £'000k	22/23 £'000	23/24 £'000	24/25 £'000	Total £'000
Existing Borrowing – land / design	173	4	11	2		190
New Borrowing from proposals		56	379	760		1,195
Additional Waste			163			163
Depots Costs		60		(30)		30
Rent Savings			(130)	(149)		(279)
Haulage Savings				(150)		(150)
PV Energy Savings				(54)		(54)
Total Net Growth Requirement	173	120	423	379		1095
<u>Provide for by :-</u>						
Existing Provision	173	120	280	0		573
Smoothing Reserve			143	379	-522	0
Growth from revenue budget contingency					522	522

The development facilitates the release of savings from rented depots and efficiencies from changing haulage arrangements and energy from Photovoltaics. Whilst not cash-releasing, there is also a reduction in property repair and maintenance liabilities at outdated facilities, which have lacked investment for many years and have significant repair back-log.

5.4 Revenue growth of £1,650K was provided for both Service Redesign and Service Relocation in Council Budget-setting, 2018/19 £1,380k & 2019/20 £270k. Of these sums, £1,077K has been committed to Service Redesign, leaving a balance of £573K for relocation proposals. The increased growth of £522K from the proposals, initially comes from set aside sums in a Smoothing Reserve but on-going budget from 2024/25 is provided from the Revenue Budget Contingency.

5.5 The business case has been updated regularly to reflect current financial positions; project scope and estimated costs; housing growth projections; accessibility of grants to reduce borrowing; local and national policies and objectives; strategic fit and the case for change; economic case and

procurement considerations; management, delivery and governance arrangements; risks, constraints and dependencies.

5.6 The business case provides the corporate assurance that the investment is justified and financially robust and provides a management tool for evidence-based and transparent decision making.

5.7 Approximately 200 operational staff will be based at the new Keynsham Recycling Hub, supported by management and technical support staff, in modern welfare and office facilities, tailored to our operational needs and in accordance with our Health, Safety & Wellbeing policies.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

6.2 Delivery of the Keynsham Recycling Hub project includes comprehensive risk management procedures and project and quality assurance through supervision of the design development and construction phases. This will include contract administration, inspection and approval of works.

7 EQUALITIES

7.1 As a front-facing service with significant touch points with all residents and households across the district, waste & recycling collections and public reuse and recycling centres have a core focus of equality and accessibility. Equalities Impact Assessments are carried out using the EIA/Equalities analysis template at the time of service delivery changes, and that will be incorporated as part of the design and construction process and prior to the site opening.

8 CLIMATE CHANGE

8.1 Solar installations on roofs and canopies, rain-water collection and reuse for vehicle washing and watering planted ecology areas, energy efficient buildings, tree-planting, ecology and landscaping are examples of the features built-in through the design process.

8.2 The future replacement of refuse and recycling vehicles to electric powered vehicles is being factored in and infrastructure to future-proof the site has been of key importance.

8.3 We use specialist route planning software for the refuse, recycling and garden waste rounds to minimise distances travelled, whilst collecting from every household in the district, and to avoid local community impacts wherever possible.

8.4 The Keynsham Recycling Hub is on the strategic road network for access to the ring road and motorway for the bulk haulage of waste and recycling to treatment and reprocessing sites in the West of England and across the UK. This will allow us to maximise the highest payload forms of transport, and so reduce carbon emissions for this part of the operation.

9 OTHER OPTIONS CONSIDERED

9.1 Do nothing: This entails a high risk of service failure. The existing sites are no longer fit for purpose, they are on the limit of the tonnage they can manage, have been underinvested for many years and have no expansion potential.

9.2 Lease sites and re-develop so fit for purpose: This entails high financial and operational risk. There are no sites of sufficient size and capacity within the district, nor close by in neighbouring districts that will suit our objectives. We would need to invest in constructing on leased land and indicative financial and property benchmarking costs show more capital growth would be required.

10 CONSULTATION

10.1 This report has been approved by the S151 Officer and Monitoring Officer

10.2 Comprehensive site-specific pre-planning application consultation was carried out in December 2020. This was alongside a free-text response consultation seeking ideas for Bath sites and future recycling generally. The planning process also included a 6-week consultation period in February and March.

10.3 The construction contractor will be responsible for a community communication and engagement plan for local residents and businesses, which will be supported by the Project team and the council's Communications & Marketing team.

Contact person	Carol Maclellan, Assistant Director, Environmental Services 01225 394204
Background papers	The table in Section 5.1 details previous decision reports with reference numbers. Planning Committee 28 th July 2021 details full planning application for the new Recycling Hub
Please contact the report author if you need to access this report in an alternative format	

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Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING DATE:	20 July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3293
TITLE:	Commercial Estate Review Update	
WARD:	All	
AN OPEN PUBLIC ITEM		
<p>List of attachments to this report:</p> <p>Appendix 1: Commercial Estate review exec summary</p> <p>Appendix 2: Commercial Estate Workstreams & governance</p> <p>Appendix 3: Aequus repurposing methodology and process</p>		

1 THE ISSUE

- 1.1 The report provides an update to the Cabinet on the outcome of the Commercial Estate review carried out by Montague Evans during the final quarter of the 2020/21 financial year and sets out the next steps in managing the Council's commercial assets.
- 1.2 The report refers to the current position of empty commercial units (voids) and the proposal to invest in these assets to address maintenance issues enabling marketing for new lettings and also consideration for repurposing to a changing in use to diversify the income generating potential.
- 1.3 The report also refers to the devastating impact Covid has had on the visitor economy and on the Council's commercial estate retail properties. This impact has in turn affected the Council's finances. The Council must therefore consider alternative sources of revenue generation from empty commercial properties through identifying alternative use through repurposing.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Note the findings and the executive summary from the Commercial Estate review.
- 2.2 Approve the Commercial Estate review plan, workstreams and governance arrangements and delegate to the Property Review Board / S151 Officer, responsibility for implementing the governance arrangements and required restructuring, respectively.
- 2.3 Approve the Capital budget of £2.337m for Commercial Estate Refurbishment Programme, utilising funding as described in section 5.2.
- 2.4 Approve the creation of a capital reserve to be funded from dilapidation and insurance income relating to capital refurbishments.
- 2.5 Approve the approach to Commercial Estate repurposing to residential accommodation using the Council's housing company Aequus, with delegation for transfer arrangements given to the Chief Financial Officer (S151) in consultation with the Cabinet Member for Resources and Economic Development.

3 THE REPORT

- 3.1 This report provides an update on the Commercial Estate review and the next steps for managing the recovery of the financial impact on the estate from Covid.

Commercial Estate review

The impact of Covid and government lockdowns has been significant on the retail economy in Bath, the Councils 2020/21 revenue budget required a net income return of £15.2m which is income that funds service across the Council including Childrens and Adults Social Care.

The variance to budget at year end for 2020/21 is an adverse position of £8m, of this variance c£5m is due to the downturn in realisable income during 2020/21. This is made up of rising voids, reductions in current market rent and outstanding debt that is now at risk. The remaining £3m is due to a technical accounting adjustment at year end that aligns the billing period and financial year as this needed aligning in the Councils accounts.

Commercial rental income loss has not been supported by government grant reimbursement; this income loss needs to be absorbed by the Council implementing mitigating actions.

Considering this risk a review of the performance of the Councils Commercial Estate has been carried out by Montague Evans.

Montagu Evans report findings:

Appendix 1 contains the executive summary from the review, the high-level findings identify that the Council has around 234 commercial assets and of these 80% are retail. The gross income generated off these is around £18.95m, however this is now at risk, following the income pressures faced by the Council in 2020/21 the income budget has been reduced by £5m for 2021/22.

Whilst there has been a reliance on visitors and tourist income in Bath, the economy remains strong and with rising demand for houses and with flexible working this creates new opportunities.

There is a strong case for change and the Councils Commercial Estate can be a catalyst to create new opportunities. The report and executive summary highlights the following:

Challenge	Opportunity
A Changing Market	Recalibrate offer to welcome tourists whilst reducing income reliance & address the needs of the resident community.
Governance	Develop a clear commercial vision and adapt governance and decision making to be more flexible to respond to market changes.
Investment	Invest and maintain the asset base and bring in resource to manage the portfolio as effectively as possible.
Data and Information	Further develop data to give an oversight of performance and help inform effective decision making.
Heritage	Work with partners and experts to establish Bath as a world leader in zero carbon for heritage.
Expertise	Undertake a review of existing resource and identify the expertise needed to tackle the key objectives.

Mission Statement & Route Map

Given the size and value of the Council's Commercial Estate to Bath and North East Somerset Council and its residents it is important to have a mission statement that will underpin an emerging strategy, this is proposed as:

“To establish the Commercial Estate as an exemplar landed estate, outstandingly governed, and commercially and socially impactful for the residents of Bath and North East Somerset.”

To achieve this a route map will need to be followed as the challenge should not be underestimated, however through good planning, governance and resourcing this is achievable and will create great opportunities. The route map in appendix 1 is summarised below:

Governance	Rolling business plan with objectives
Data	Effective data to drive decision making
Portfolio Structure	Differentiate commercial from traditional structure
Resourcing	Appropriate to investment portfolio size
Accountability	Transparent, empowered, and accountable

3.2 Progress to date

In alignment to the Council's new Senior Management Structure the responsibility for the Commercial Estate function now sits with the Chief Financial Officer (S151). This will create alignment with the development and leadership of the Council's wider financial strategy which includes income generation.

This change is going through its transition phase with the implications on the wider Council Property teams being worked through under the leadership of the Interim Head of Property Transformation.

To enable operational and strategic management of the Commercial Estate the following workstreams have been mobilised to put in place structure and governance. These workstreams report through to the Property Review Board attended by the Chief Operating Officer and Cabinet Member for Resources and Economic Development. The workstreams are as follows:

- Service Performance
- Tenant Management and lettings
- Commercial Estate Recovery and investment planning
- Commercial Estate Strategy and Business plan

The workstream and reporting governance can be found in appendix 2.

The new governance arrangements will enable flexible decision making so the Commercial Estates team can respond to market interest in the B&NES Commercial Estate and have autonomy to enter new lease arrangements. This will encourage an outcome focussed approach that can be implemented at the required pace to keep up with market demand.

The list below highlights some of the achievements to date:

- Interim Structure for Construction Maintenance and FM agreed, applications received for acting up posts
- Draft Asset Strategy complete
- Baseline data provided
- 6 weekly Finance reviews put in place and started
- Compliance Manager JD drafted
- Project Board Created
- Data and Systems Review Brief Approved
- Commercial Estate Workstreams established
- Commercial Hub opening plan in place.
- Establishment of a PMO role
- Additional resource secured to deliver Commercial Estate priorities

Commercial Estate improvement and investment

3.3 The Commercial Estate review has identified that there are commercial units that need investment to enable them to be marketed for new tenants. The first phase of this work identified a capital investment requirement of £740k for 26 units. The works within this programme have been scoped and are progressing through tendering and commissioning, with an estimated completion date of 31st August 2021.

3.4 The phase two feasibility work has been completed and identified that there are further areas of investment required to meet historic maintenance liabilities and separation works to enable re-purposing to take place to enhance commercial return. The high-level programme is set out in section 5.2, a programme contingency is included and as well as provision to ensure Landlord energy efficiency and carbon reduction liabilities will be met, which becomes a legal requirement from 2023. The capital investment required to carry out the improvement works is estimated at £2.337m over two years

Commercial Estate Repurposing

The issue

3.5 The Commercial Estate portfolio has been heavily reliant on retail tenants to meet its annual income target, as highlighted in appendix 1 this makes up around 75% of the annual revenue. This has become a significant financial risk to the Council with trends emerging prior to the Covid pandemic and now crystallising from the devastating impact the Government lockdowns have had on the retail economy. To address this in the 2021/22 budget the Council adjusted its Commercial Estate income budget from £18.95m per annum in 2020/21 to £13.95 per annum in 2021/22.

This is a £5m budget pressure on the Council from income that is no longer deliverable due to increasing voids, current market rent being materially lower than the pre-pandemic levels and a high amount of outstanding debt in arrears on

the estate. This is income that is needed to fund core service provision in other services across the Council such as Children's Social Care and Waste.

The opportunity

- 3.6 To start addressing this challenge and diversifying the income from retail to other areas that are more stable there is the opportunity to utilise our assets and repurpose to other uses such as office and residential. Through the Council's property development company Aequus there is the opportunity to progress the conversion of unutilised retail assets into income generating residential units.

This approach will help diversify the estate and enable the opportunity to utilise Aequus as the Council owned housing company alongside the development of wider plans to explore the delivery of affordable and social housing.

The Council has appraised an option put forward by Aequus. The proposed option includes the leasing on a short term basis of Council-owned commercial units that are not providing the Council with much needed revenue currently. Aequus will convert the properties to residential use (including initial survey, planning consents and refurbishment to a residential specification) and seek to let the resulting residential units. Subject to a management fee and usual landlord costs e.g. maintenance, insurance etc, Aequus would then pass through the balance of rental payments to provide a revenue stream from what would otherwise be long term vacant properties. (Appendix 3 sets out the methodology & process in greater detail)

The Process

- 3.7 The Council would make an unsecured loan to Aequus in order that Aequus can undertake the conversion of the leased commercial properties to residential (the **Conversion Loan**). Once the Conversion works are completed Aequus would pay commercial interest at the secured rate. It is proposed that the Conversion Loan would be written off if the short term lease to Aequus is not renewed or is terminated. The Facility is already in place and the Conversion Loan would sit within that facility. The Council is lending at a commercial rate and the benefit of any write off will reside in the asset which reverts to the Council if the lease is not renewed or terminated
- 3.8 The amount of the loan facility that is available for working capital loans in relation to the cost of associated conversion works being undertaken prior to their transfer to the secured lending rate once the works are completed, will need to be reviewed once the programme has been developed. Any change in the approved loan facility limits will be informed by further scoping and feasibility work being undertaken by Aequus for the Council. It is proposed to delegate the agreement of any changes to the loan facility agreement and limits to the S151 officer in consultation with the Chief Executive, the Cabinet Member for Resources and Economic Development and the Monitoring Officer where this is within existing budget approvals.
- 3.9 To enable the transfer of properties once identified between the Council and Aequus the methodology and process is set out in appendix 3. This aligns with the outcome and the road map from the Commercial Estate review and will

enable the Council to make best use and future proof its Commercial assets to continue generating income for the Council. As the process sets out all transfers will be subject to business case approval to ensure commercial viability before material costs are incurred. Through the Commercial Estate recovery and investment workstream assets will be identified and worked through with Aequus to business case stage, the approval of business cases and property transfers will be managed through the Property Review Board. Transfer decisions will be made through delegation, proposed in this report, to the Chief Financial Officer (S151) and Cabinet Member for Resources and Economic Development.

4 STATUTORY CONSIDERATIONS

- 4.1 The Council may dispose of the properties held in the General Fund under s123 Local Government Act 1972 provided the disposal under the short term leasing arrangements represent the best consideration reasonably obtainable.
- 4.2 The Council may use its General Power of Competence under the Localism Act 2011 to act for a commercial purpose (i.e. take actions to maximise revenue from assets with residential potential in view of the covid-19 pandemic) provided it carries out those activities through a company.
- 4.3 General Consent C¹ may be relied upon for the provision of "financial assistance" to Aequus in the form of the Conversion Loan. Section 24(2)(a) of the Local Government Act 1988 (**The 1988 Act**) provides that financial assistance consists of "a grant or loan to that person" and the General Consent C provides that " a local authority may provide any person with any financial assistance (other than the disposal of an interest in land or property): (a) for the purposes of or in connection with the matters mentioned in section 24(1) of the 1988 Act". Section 24(1) refers to the conversion and improvement of any property which would be the case here.
- 4.4 The Council would need to satisfy itself that it fulfils its fiduciary duty if and when the time comes to take the decision to write off the Conversion Loan but it is expected that the uplift in value of the asset through the conversion works will evidence that.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 To manage the implementation of the Commercial Estate review there will be a fixed term resourcing requirement to ensure that additional capacity and skills are brought into the Commercial Estate function to manage and deliver the recovery plan and route map. As this is needed in response to the Covid pandemic a one-off £412.5k allocation of Covid grant has been committed as follows:

Resource requirement	2021/22 £000	2022/23 £000	Total £000
Commercial agent support	75	37.5	112.5
Business plan and strategy development	100	50	150
Programme co-ordination	50	25	75
Programme budget	50	25	75
Total			412.5

5.2 The programme approval for 2021/22 & 2022/23 is summarised below, along with funding identified from provisional programmes:-

	2021/22 £'000	2022/23 £'000	Total £'000
Programme Approval (Total)	1,810	527	2,337
Dilapidation Payments (3 rd Party Contribution)	267	0	267
Corporate Estate Planned Maintenance (Corporate Supported Borrowing)	601	431	1,032
Commercial Estate Refurbishment Programme (Corporate Supported Borrowing)	942	96	1,038
Total	1,810	527	2,337

5.3 This report is requesting approval for the creation of a new reserve for commercial estate receipt of insurance and dilapidation income relating to capital works. The proposal would be to carry out capital costs from the refurbishment programme when a need arises, subsequently applying the income received, typically after lengthy negotiations to a later programmes, likely to be in future financial years.

5.4 A separate report for consideration at this meeting is for Bath City Centre High Street Renewal (E3260) and notes proposals to seek WECA funding for 'vacant unit action' seeking £255k grant. Proposal will be submitted to bring vacant shops back into active use along with cultural and commercial and arts initiatives. The programme will be used to match fund costs of projects and some grant may become available to provide funds for additional works.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

6.2 The substance of this report is part of the Council's risk management process. The key risks in the Council's budget were assessed by each Director, with these risks re-assessed on a monthly basis as part of the budget monitoring process.

7 CLIMATE CHANGE

7.1 All future maintenance and investment into the commercial estate will need to consider the Council's priority to address the climate emergency and be carbon neutral by 2030. This will require retrofitting and improvements to heritage assets.

7.2 The Council will need to consider the opportunity highlighted in Appendix 1 in the case for change to work with our partners to become a leading authority in zero carbon heritage assets.

8 OTHER OPTIONS CONSIDERED

8.1 Other options considered include do nothing which is not considered a viable option as under the Councils Policy and Budget Framework income to support the wider operating costs and delivery of Council services needs to be managed responsibly and appropriately.

8.2 For assets being considered for repurposing alternative options will be presented through the business case approval process to ensure the best course of action is agreed.

9 CONSULTATION

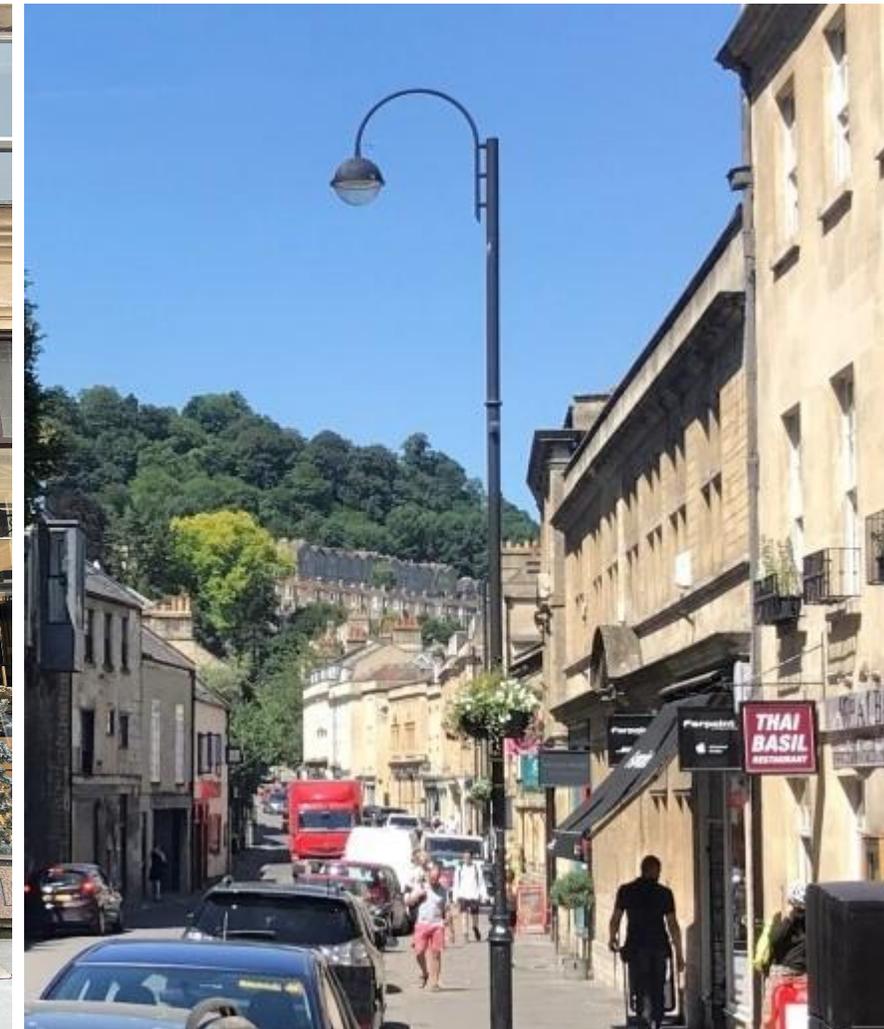
9.1 Consultation has been carried out with the Cabinet Member for Resources and Economic Development, Directors, Section 151 Finance Officer, Chief Executive and Monitoring Officer.

Contact person	Andy Rothery – Chief Financial Officer (S151) 01225 477103; Andy_Rothery@bathnes.gov.uk
Background papers	Property Services review – December 2020 Cabinet https://democracy.bathnes.gov.uk/documents/s63758/E3244%20Property%20Services%20Service%20Review.pdf
Please contact the report author if you need to access this report in an alternative format	

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COMMERCIAL ESTATE REVIEW

Establishing the Commercial Estate as an exemplar landed estate, outstandingly governed, and commercially and socially impactful for the residents of Bath and North East Somerset.



DIAGNOSIS

THE COMMERCIAL ESTATE

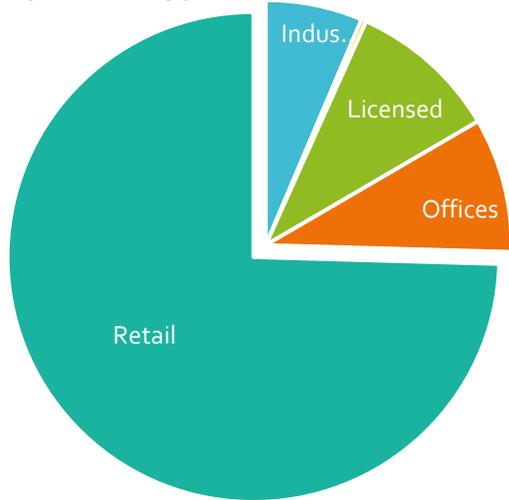


B&NES has one of the largest commercial estates of any unitary authority. It has grown over the years and has served as an important buttress to the financial sustainability of the Council.

Much of the estate comprises heritage assets, which are costly to maintain and complicated to repurpose, and around 80% by value (75% by revenue) are retail assets.

As the Commercial Estate has grown, the success of Bath as a destination has kept pace. It led to competition in the market from occupiers for the assets we own. This drove improvements in rents and capital values, but also meant that there was limited impetus to proactively manage the buildings. We managed to get by largely using existing estate, finance and support resources.

Commercial Portfolio Revenue by Asset Type



Coronavirus has accelerated the pace of the change in markets, communities and society. This has been acutely felt in the retail property market meaning that legacy issues of obsolescence and complicated management have been compounded by failing tenants, falling rents, and a need for a greater breadth of skills and new investment.

We need to recognise the challenges to vitality in Bath and reduce reliance on tourism. We need to create a sustainable economy with greater opportunity for betterment, greener, healthier outcomes, affordable homes and a stronger, more resilient city which celebrates its unique heritage yet is fit for the future.

ASSESSING THE CHANGING LANDSCAPE

We need to do things differently, so we conducted an independent review of the Commercial Estate. It focussed on the City Centre estate where our challenges are most acute, yet where the opportunity for us to try something new is greatest.

CAUSE, EFFECT & OPPORTUNITY	City centres need a renewed purpose
	Flexible working is here to stay
	Online shopping means shops are less financially sustainable
	Housing supply and affordability crisis
	Climate and nature emergency
	Large, highly complex estate
	Increasing obsolescence and capital requirements

We engaged stakeholders both internally and externally, we considered market trends and reflected on our skills and capacity.

The Commercial Estate bestows upon us an obligation for stewardship and custodianship of the buildings and the communities they serve. We need to be flexible, to embrace change, to meet the challenges of place and climate change by providing homes, opportunities, services and enjoyment that is easily accessible for residents and visitors.

We will do things differently, and better, using the Commercial Estate as a catalyst to develop a financially sustainable, long term solution.

THE CASE FOR CHANGE

CHALLENGES



A CHANGING MARKET



GOVERNANCE



INVESTMENT



DATA & INFORMATION



HERITAGE



EXPERTISE

ACTING ON THE OPPORTUNITIES

- Promote a '15 Minute City' for the needs of our community
- Recalibrate offer to welcome tourists whilst reducing reliance on them
- Promote the increasing opportunity for 'staycations'

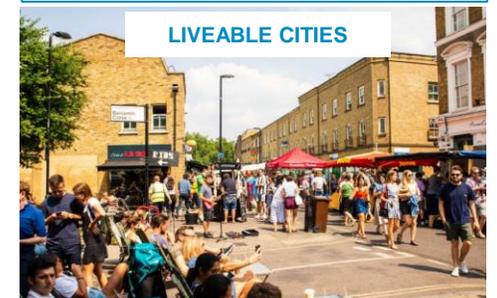
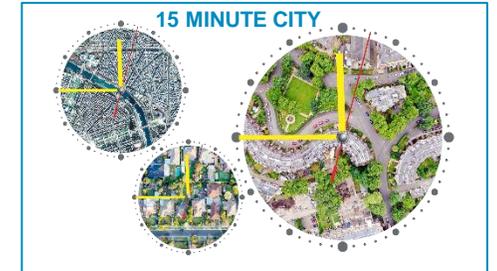
- Develop a clear commercial vision which integrates all teams needs and aspirations
- Adapt decision making processes to align with the vision and commercial principles
- Promote flexible & simple lease arrangements to support independent businesses

- Adopt a proactive approach to maintaining buildings to reduce future liabilities
- Invest in the tools and resource to manage the portfolio more efficiently
- Consider disposal of non-core assets to reduce liability and invest into the estate

- Improve visibility over asset and portfolio performance
- Invest further in data management systems and people to enable greater transparency
- Promote the use of data to make informed decisions

- Capitalise on the opportunity and the potential to work with companies and universities to establish Bath as a world leader in zero carbon for heritage
- Align LPA with the corporate objectives to work with the Bath Preservation Trust

- Undertake a strategic review of existing resource in the context of the portfolio scale, complexity and future objectives.
- Identify the specialist expertise required to tackle key objectives (climate change/placemaking)



MISSION STATEMENT & ROUTE MAP

To establish the Commercial Estate as an exemplar landed estate, outstandingly governed, and commercially and socially impactful for the residents of Bath and North East Somerset.

This is the first step in addressing the challenges and opportunities facing the Commercial Estate. We have researched, benchmarked and engaged with stakeholders to devise a route-map for transition. This outlines the plan to develop a modern, fit-for-purpose, well governed Commercial Estate that will promote positive change and ensure accountability. We will be able to make better, clearer, data-driven decisions and use our estate to support Bath's economy and outcomes for residents and visitors. Ultimately, we will have a more balanced, resilient income profile that supports housing delivery and economic growth.

GOVERNANCE OVERSIGHT FOR ROBUST ONGOING ACCOUNTABILITY

GOVERNANCE

To be a success, the Commercial Estate governance needs to be flexible and dynamic to respond to the market.

To achieve this, it needs outstanding governance. It should be subject to a rolling business plan which sets objectives and key performance indicators. It should report into a Board with delegated authority to oversee its activities.

DATA

Using data to drive decision making requires a greater understanding and transparency.

This must build on the work already done to create an environment where the true cost and return on an asset can be clearly understood.

PORTFOLIO STRUCTURE

The Commercial Estate should be structured to clearly delineate itself from core council property activities. The structure should build on the segmentation proposition of 2020 with a clear remit to invest and recycle capital to ensure a sustainable income stream back to B&NES.

Occupational, operational and tertiary assets e.g. park cafes, commercialisation of library cafeterias, etc. to be held under a separate, traditional structure.

RESOURCING

The Commercial Estate requires resourcing commensurate with the operation of a comparably sized investment portfolio. This will require asset, property, data and finance managers. Additional support can be bought in from the Council on a chargeable basis and augmented with third party appointments for specific instructions and projects.

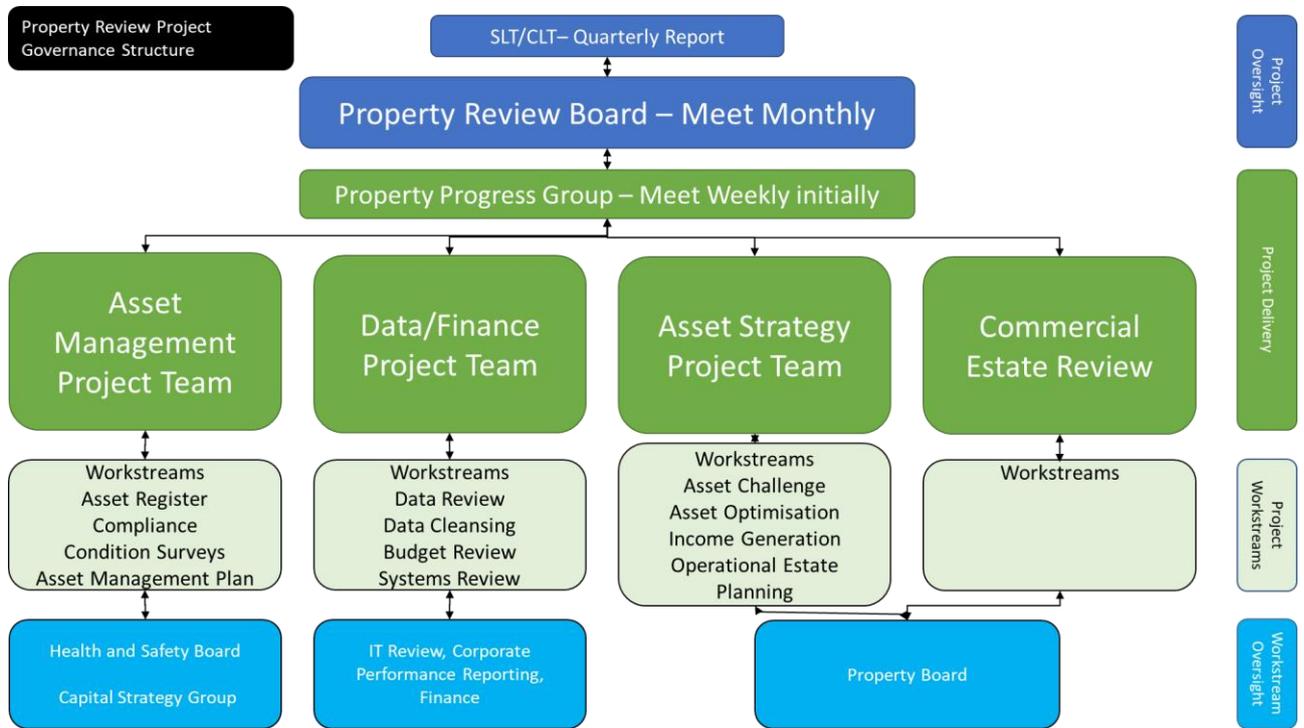
ACCOUNTABILITY

With these steps in place, the Commercial Estate will be transparent and its officers both empowered and accountable to a clear governance and performance structure. Objectives will be aligned to the Council's with a remit of long term custodianship of place, taking a modern commercial view to create sustainable financial, social and economic returns.

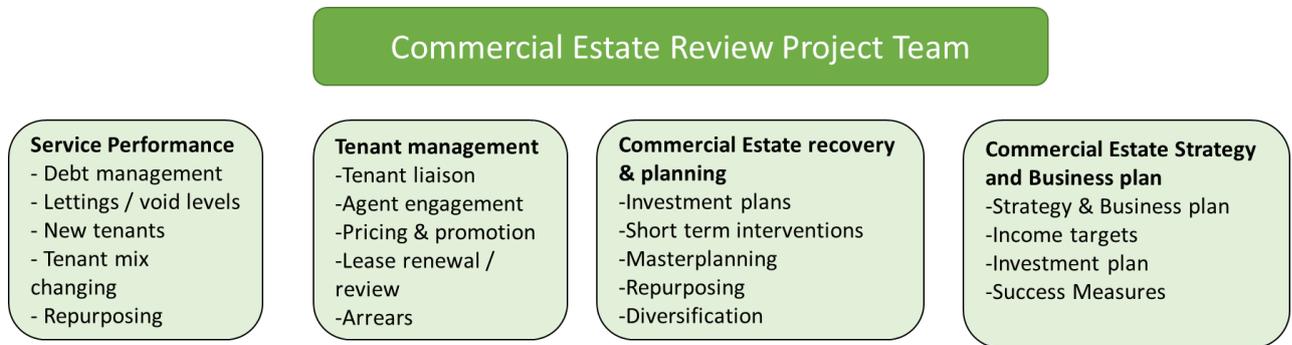
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APPENDIX 2

Property and Commercial Estate Governance Structure



Commercial Estate Workstream Governance



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APPENDIX 3

Methodology and Process for Repurposing of Commercial Estate Assets for Residential Use

Background

This paper sets out the methodology and process to be used for the repurposing of the Council's commercial estate where it is agreed the properties can provide best overall returns to the Council going forwards as residential conversions. The intention is to provide for a simple approach for an efficient process to deliver revenue returns to the Council, securing a timely refurbishment of the property with appropriate governance and decision making in place.

Methodology

The intention is to ensure maximum revenue flow to B&NES as efficiently as possible and, avoiding the transfer of the asset, the need for related loans minimised and no fixed charges as follows:

Conversion Costs

Apart from a small initial feasibility cost met by the Council's Commercial Estate revenue budget under a purchase order, these will be met by Aequus and funded by a commercial loan from the Council (asset backed on the basis we would be enhancing the Council asset). Any specified Council standards or suppliers can be included as part of the conversion specification. Aequus will be responsible for securing necessary consents for all such conversions. It is anticipated that provided this is from approved capital loan resources, the loan for the conversion costs can be approved within existing Officer Delegated arrangements (S151 Officer).

Lease Arrangements

The Council will grant Aequus an appropriate short term business lease based upon all actual rent received being payable to the Council less agreed costs – these are limited to:

- Letting Agent Fees (currently around 7.5% of rental)
- Aequus management fee (currently at 10% of rental)
- Aequus loan repayments to the Council (EU Ref Rate +1%)
- Actual maintenance cost and service charges incurred (see other cost below)

Aequus will then manage the portfolio of properties to provide private residential rentals on an Assured Shorthold Tenancy basis to maximise rental returns and ensure they are maintained to a suitable standard.

As business leases are made to Aequus, the right to buy will not apply. No asset transfer will take place to Aequus – the properties remain wholly on the Council balance sheet and Aequus will have no legal interest in the property beyond the short-term commercial lease.

In the even the short-term lease is not rolled over by the Council then any balance remaining on the commercial loan to cover conversions costs will be written off by the Council (the Council retains an enhanced asset though).

It is anticipated that the granting of the relevant commercial lease can be made within existing officer delegated authority by the CPO (Corporate Property Officer).

Other Costs

All such costs including service charges, property insurance and maintenance will be a direct pass through to the Council.

Process

The process for repurposing of an existing commercial estate asset for future residential use is set out in three stages below:

Stage 1 – Identification and Proposal

- A current or future void commercial estate property which is unlikely to be suitable for the future commercial estate (wholly or in part) will be identified to Aequus by the CPO.
- Aequus will identify a potential option(s) for the future residential use of the property which will be agreed by the Property Board.
- The Council will then issue an initial purchase order (PO) to Aequus to produce an outline feasibility study for the property which will confirm or otherwise the potential future use identified and act as a gateway decision point.
- Subject to approval of the feasibility study by the Property Board, Aequus will progress all surveys, consents and specifications required to convert the property into the agreed residential. The cost of which will be funded by the commercial loan.
- Aequus will then prepare a simple Business Case proposal setting out the capital conversion specification, costs, and the likely revenue returns. Supporting detail will be provided as appropriate.
- This will be submitted to the S151 Officer and CPO

Stage 2 – Evaluation and Approval

- The Business Case will be considered by the S151 Officer considering the conversion cost for the Commercial Loan and the revenue returns being provided by the proposal, noting the asset remains wholly in the ownership of the Council.
- Subject to the above approval the Council will provide a Commercial Loan for the total conversion costs (including the initial survey, consents and specification) to Aequus.
- The CPO will also confirm that a Business Lease will be issued to Aequus prior to the conversion works, in accordance with the Methodology.

Stage 3 – Implementation and Monitoring

- Upon receipt of the commercial lease, Aequus will deliver the conversion works in accordance with the approved specification.

- Aequus will secure suitable private Assured Shorthold Tenancies for the properties and operate these in accordance with the methodology. AST's should not extend beyond the period of the agreed Business Leases (as extended by agreement).
- Aequus will provide regular reports to the Client Board as to progress with conversions, details of AST's in place, voids, maintenance, and portfolio financial returns. This reporting should also include regular tenant feedback obtained via the appointed letting agent.
- In the event a business lease is not renewed for any reason at the Council's discretion then any balance outstanding on the Commercial Loan will be written off by the Council.

This methodology and process may be varied with the agreement of both parties.

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Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING DATE:	20 July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3236
TITLE:	Revenue & Capital Outturn 2020/21	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1: Detailed Revenue Budget Outturn		
Appendices 2(i) & 2(ii): Proposed Revenue Virements & Revised Revenue Cash Limits 2020/21		
Appendix 3: Detailed Capital Variance & Rephasing Requests 2020/21		
Appendices 4(i) & 4(ii): Capital Virements & Capital Programme by Portfolio 2020/21		

1 THE ISSUE

- 1.1 The report presents the revenue and capital outturn for 2020/21, highlighting an on-budget position after allowing for proposed transfers to reserves and carry forwards. Whilst there has been no movement in the reported position against the Quarter 3 forecast, there has been improvement from an under budget position in Adult Social Care of £4.29m, together with the proactive Financial Recovery measures and Covid grant funding that has mitigated all other pressures leaving a further net £1.13m underspend. These are one-off benefits which are proposed to be transferred to reserves to support the Council in dealing with the budgetary impact of Covid in 2021/22.
- 1.2 The report refers to requests to carry forward specific revenue budget items to 2021/22 and to write-off revenue over budgets where recovery in future years would have an adverse impact on continuing service delivery.
- 1.3 It is proposed that £5.42m is transferred to the corporate earmarked reserves used to support the Medium Term Financial Strategy smoothed savings approach. This will part replenish these reserves, following the use of £8.5m approved as part of the 2021/22 Budget Report to support the budget.
- 1.4 The report also refers to requests to re-phase specific capital budget items to 2021/22 and to remove net capital underspends.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Note the revenue budget outturn on budget position for 2020/21, after allowing for carry forwards and transfers to reserves.**
- 2.2 Approve the revenue carry forward proposals listed in the tables in paragraph 3.8.**
- 2.3 Approve that all over budgets are written-off as an exception to the Budget Management Rules for 2020/21.**
- 2.4 Approve the transfer of £5.42m to corporate earmarked reserves, the breakdown of which is detailed in paragraph 3.9;**
- 2.5 Note the revenue virements for 2020/21 reported for information in Appendix 2(i)**
- 2.6 Note the reserve positions and the use of flexible capital receipts shown in paragraphs 3.18-3.20;**
- 2.7 Note the outturn position of the 2020/21 capital programme in paragraph 3.35, and the funding outlined in paragraph 3.37;**
- 2.8 Approve the capital rephasing and write-off of net underspends as listed in Appendix 3. This reflects the outturn spend position on projects against final budgets as detailed in Appendix 4(ii).**

3 THE REPORT

- 3.1 This report provides information about the Council's financial performance against its revenue and capital budgets in 2020/21.**

Revenue Budgets

- 3.2 The report identifies that, after allowing for carry forwards and transfers to corporate reserves, the Council delivered an on budget position in 2020/21.**
- 3.3 This represents a significant achievement, considering the financial pressures caused by the Covid-19 pandemic, with substantial income losses in Heritage Services, Parking and Commercial Rents, as well as other income generating services, combined with new Covid related expenditure pressures.**
- 3.4 The balanced outturn position has been delivered within the context of the unprecedented demands being placed across Council services in response to the pandemic. Examples of some of those service demand pressures include, Adult Social Care, Wellbeing Services, addressing the needs of the homeless community, supporting schools and vulnerable pupils, providing infection control**

support to key settings, track and trace activity, support for the vaccination hub and the delivery of the business support grant schemes.

3.5 The table below shows the overall revenue outturn position by portfolio:

Portfolio	Revised Budget £'m	Outturn £'m	Variance Over / (Under) £'m
Leader	(0.63)	(0.01)	0.62
Resources	8.64	2.03	(6.60)
Adult Services	54.95	50.27	(4.68)
Children's Services	30.96	32.84	1.88
Climate Emergency & Neighbourhood Services	17.00	16.84	(0.16)
Transport Services	(0.36)	(0.06)	0.30
Housing, Planning & Economic Development	4.00	2.83	(1.17)
Community Services	(3.36)	0.72	4.08
Total (before Carry Forwards and Transfers to Reserves)	111.19	105.46	(5.73)
Carry Forwards Requests			0.31
Proposed Transfers to Reserves			5.42
Total (Including Carry Forwards and Transfers to Reserves)			0

Note1: Some of the figures in this table are affected by rounding.

3.6 The main areas of over/under budget and change against the April to December outturn forecast position are as follows:

Leader (£0.62m over budget, £0.63m adverse movement)

The closure of the Council's destination tourism company Visit Bath in favour of an alternative model has resulted in an over budget position of £0.51m relating to the impact of funding the liabilities underwritten by the Council. Reserve funding was approved to cover these liabilities, however this pressure has been mitigated through the financial recovery plan and additional Covid grant. Income from the Council's housing delivery company from Dividends and market interest paid on loans was £0.89m compared to the £1m budget, the variance of £0.11m

reflects the revised profile of loan drawdowns to support development schemes, resulting in lower interest receipts than previously forecast.

Resources (£6.60m under budget, £1.25m favourable movement)

The Council's Commercial Estate has been significantly impacted by the pandemic, which has resulted in difficulties in letting units and achieving pre-pandemic market rent levels. This will likely continue into 2021/22 and levels of outstanding rent arrears are being closely monitored. The variance to budget at year end for 2020/21 is an adverse position of £8.11m, of this variance c£5m is due to the downturn in realisable income during 2020/21. This is made up of rising voids, reductions in current market rent and also outstanding debt that is now at risk. The remaining c£3m is due to a one-off technical accounting adjustment at year end that aligns the billing period and financial year as this needed aligning in the Councils accounts. The 2021/22 budget has been rebased, with the income budget reduced by £5m to reflect the pressure on rental income.

The ICT service has experienced additional pressures placed upon it throughout the year as a result of large sections of the organisation working remotely and as a result was over budget by £0.47m.

Corporately held savings targets relating to Digital £0.75m, Improving How We Work £0.3m and Procurement £0.3m were thoroughly reviewed and assessed as not deliverable in 2020/21 or 2021/22. These are primarily cross Council efficiency programmes requiring staff savings and the deliverability of the savings have been impacted by the Covid pandemic and the diversion of resource to focus on the new demands being placed on the organisation. The on-going pressure has been addressed in the 21/22 approved budget.

Reduced borrowing costs resulting from both higher cash balances and a reprofiled capital programme (£3.3m), combined with £12.4m benefit of corporately held Covid-19 support grants have offset the aforementioned pressures, creating an overall favourable position for the portfolio.

The un-ringfenced Covid support grants were held corporately within the Resources portfolio and have also contributed to the mitigation of Covid service pressures highlighted across other portfolios.

Adult Services (£4.68m under budget, £2.96m favourable movement)

Adult Services have been greatly affected by the Covid-19 Pandemic which has resulted in positive variances in commissioned purchasing budgets. This was partially due to placements resulting from a hospital discharge being funded via the NHS funded hospital discharge pathway from March 2020 until November 2020 and for the first 6 weeks from November to the end of the 2020-21 year. This resulted in lower social care placements in both number and value.

The community services, in particular day care and respite care were required to close in line with lockdown requirements, so were unavailable for most of the year, and where they were available, delivered a reduced service to ensure compliance with Covid-19 precautions. This resulted in reduced direct spend on these services and is reflected in the underspend budget position.

Throughout the year, financial support was given to care providers in the form of supplier relief, to ensure that providers were able to continue to deliver services by retaining their resources and working with commissioners to deliver services in alternative ways to ensure people were supported in their needs. These costs were covered by the underspend position within budgets.

The service supported the Council's adverse financial position by delivering £3.6m of in year recovery savings, reflected in the final underspend budget position. Further actions have taken place to drive change and achieve the in-year recovery savings, including targeted reviews and use of panels to ensure that the care approved is the correct care. The service has been successful in delivering this value, mainly through one-off savings.

Children's Services (£1.88m over budget, £0.14m favourable movement)

Children's Services worked hard to deliver services within the financial envelope in 2020/2021. The Covid 19 pandemic did impact the budget position in 2020/2021.

Included in the £1.88m over budget position is £1.56m of Covid expenditure relating to placement and package costs. The Outturn also includes the delivery of in-year Financial Recovery savings totalling £0.61m, which were in the main one-off. If Covid expenditure is removed from the Outturn position, the Children's Services over budget position reduces to £0.32m.

The main drivers of the over budget position of £1.88m are considerable ongoing pressures due to Joint Agency Pooled (JAP) and Residential placement spend, totalling £2.65m. This is primarily due to an exceptionally complex placement that is not typical of historical costs. The JAP expenditure increase year on year and subsequent financial pressure, is as a result of support packages needed to keep children safe and for the complex packages of care required for the children with highest need. The Residential pressure included increased expenditure from additional placements in relation to contextual safeguarding.

The £2.65m pressure from JAP and Residential spend was offset by under budget positions across other demand driven budget areas totalling £0.6m. This was a result of lower spend than budget on Foster Carers, due to Covid affecting the recruitment of new Foster Carers in the initial lockdown and reduced spend on Parent and Baby placements. The reduced Parent and Baby spend was a result of ongoing development and implementation of the practice framework.

The JAP and Residential pressure was further offset by £0.15m reduced spend versus budget across the Early Years area. This was due to Covid reducing the ability to provide services as normal.

For 2021/2022 the £1.8m underlying pressure across JAP and Residential has been added into the base budget for Children's Services.

Climate Emergency & Neighbourhoods (£0.16m under budget, £0.04m favourable movement)

Pressures in the Waste Service due to increased staffing costs, significant increases in tonnages as a result of increased home working, and a loss in trade

waste income have been offset by delays in recruitment within the Sustainability cash limit, resulting in a favourable budget position across the portfolio.

Transport Services (£0.30m over budget, £0.99m favourable movement)

Parking is one of the key income generating areas of the Council and has been considerably impacted by lockdown and social distancing restrictions. Income fell £5.8m short of budget, while the Council received £3.9m sales, fees and charges compensation grant to part mitigate. Further recovery plan savings were achieved, reducing the adverse Parking outturn variance to £0.83m. Recovery plan savings were also realised across Highways and Traffic Management, and Public and Passenger Transport, resulting in under budget positions at year end. Costs of PPE and new infrastructure for temporary resting places also contributed to the adverse budget position on this portfolio.

Housing, Planning & Economic Development (£1.17m under budget, £0.13m favourable movement)

All four services within the portfolio (Housing, Business and Skills, Regeneration, and Planning) ended the year in an under-budget position, achieving their recovery plans through salary savings and delaying project spend.

Community Services (£4.08m over budget, £0.83m favourable movement)

This portfolio has been significantly affected by the Covid-19 pandemic, as many of the services are income generating for the Council. The largest of which is Heritage Services, which experienced a shortfall in income of £19.7m against budget. This was partially mitigated through both government Sales, Fees and Charges compensation and internal recovery plans. However, the service could not avoid falling £3.5m short of their budgeted profit target. Other services impacted by loss of income have also been part compensated through the government compensation scheme, which include Parks, Building Control and Land Charges, Registrars and Events. In addition, the Council has incurred additional costs supporting its Leisure provider during the year.

3.7 Further detail of outturn budget variances is attached at Appendix 1.

Carry Forward Requests

3.8 The following carry forward requests have been made for approval:

Request and Reason for Request	£
<p>Waste – Cleansing Service</p> <p>£100k growth in the 20/21 budget to progress priorities across the service was delayed due to the pandemic. The carry forward will allow the progression of members priorities in the new financial year. This will fund 2 vehicles and 3 crew members for 6-month programme tackling a backlog of ward councillors’ initiatives in the outer Bath wards (including parking suspensions) and a further 5 months of tackling cleansing hotspots more frequently.</p>	100,000

Request and Reason for Request	£
<p>Development Management – Planning Activities</p> <p>Covid restrictions throughout the year have prohibited the progress of some specific projects for which we have received funding from external sources to deliver. Those projects include the enforcement of planning conditions for complex cases, assessments of strategic sites in B&NES to ensure that our development allocations are properly assessed and are deliverable and help to deliver the Council's objectives on the climate and nature emergencies. Part of the carry forward is for the delayed ecological / habitat survey work relating to the WECA Spatial Development Strategy and the West of England authorities' approach to Biodiversity Net Gain.</p>	77,362
<p>Business & Skills – Skills Projects</p> <p>Delayed projects have been re-scheduled for 21/22 due to re-prioritised commitments to the Council's COVID response. Those projects include an Economic Strategy Refresh, an Invest in Bath website redesign and support for Employment and Skills POD Future Bright coaches.</p>	68,472
<p>Sustainability – Renewal Vision</p> <p>This funding was allocated to support the second stage of strategic development of the Renewal Vision, which enables alignment and delivery of major regeneration projects. Delays in the completion of the first phase has had a knock-on effect on commissioning of the second phase, meaning that the project was not complete in 20/21. The carry forward is to ensure the work can be completed during 21/22.</p>	30,000
<p>Human Resources – Apprenticeship Training Income</p> <p>Apprenticeship incentive funds paid to B&NES by the government that have not yet been spent but will be required in 21/22.</p>	20,500
<p>Events and Active Lifestyles – City Centre Events</p> <p>Funding for the We Love Our Highstreets project has been committed to creating an Arts trail in vacant units around the city centre of Bath. A lease has been taken out with property services as part of the project and the events team are working with Bath Spa University and other stakeholders to expand the project. Due to these commitments the service has requested the funding is carry forward into 21/22 to complete the project.</p>	8,873
<p>Regeneration – Fixed Term Post</p> <p>Funding received from external sources for an 18-month fixed term post that runs across two financial years.</p>	6,479
Total	311,686

3.9 After allowing for the above carry forwards, it is proposed that the net under budget position of £5.42m, is transferred to the following corporate earmarked reserves used to support the Medium Term Financial Strategy smoothed savings approach. This will replenish these reserves, following the use of £8.5m approved as part of the 2021/22 Budget Report to support the budget.

Corporate Earmarked Reserve	Transfer Amount £m
Financial Planning & Smoothing Reserve	4.608
Transformation Investment Reserve	0.703
Revenue Budget Contingency Reserve	0.104
Total	5.415

3.10 It is recommended that all over budgets are written off as an exception to the Budget Management Scheme Rules to retain budget stability in 2021/22.

Delivery of Savings and Recovery Plans

3.11 The 2020/21 approved budget included the requirement for the delivery of £4.85m of savings. Whilst some historical savings relating to digital and the improving how we work programme were not deliverable and have consequently been addressed in the 2021/22 budget, the majority of the £4.85m savings for 2020/21 were achieved. The main exception being £0.9m of increased net income from Heritage Services, the achievement of which wasn't possible during the pandemic.

3.12 Of the £20.7m Financial Recovery Plans agreed by Cabinet in July 2020, approximately £14.8m were delivered in full. The remaining £5.9m were corporate initiatives, including the use of contingency budgets, reserves and salary budget savings, which were not required to support the revenue position following the announcement of the government's Sales, Fees and Charges Compensation Scheme as well as the additional Covid support grant funding. As a result, the overall revenue outturn position has been managed within budget and the organisation has maintained resource to respond to the challenges of the pandemic.

Schools

3.13 The overall Dedicated Schools Grant for 2020/21 was £149.642m, however of this sum £104.016m was returned to the DFE to be allocated to academies, £13.693m was allocated to schools through funding formula, with the remaining £30.683m (after the prior year overspend of £1.249m) retained by the LA to support Special Educational Needs, central expenditure and Early Years.

3.14 The centrally held elements of the Dedicated Schools Grant (DSG) were over budget by £4.174m, due to significant increases in numbers and cost of placements for children with SEND which is funded from the high needs block within the Dedicated Schools Grant. This Overspend will be carried forward along with the accumulated deficit on the DSG of £1.249m giving a total overspend to be carried forward of £5.424m. In line with Government guidance any overspend is carried forward for recovery against future DSG funding. Therefore, the Council cannot fund this pressure from its own non DSG funding (unless permission is given by the Secretary of State to disregard the requirement to fund from the DSG). Year-end budgets have been adjusted to reflect the transfer of the £5.424m overspend into a specific unusable reserve for recovery against future DSG funding. This treatment is in line with recently announced government guidance stating that DSG in-year and cumulative deficits should no longer be held as a negative earmarked reserve and should instead be held in an unusable reserve called the Dedicated Schools Grant Adjustment Account. This accounting treatment has the effect of separating schools budget deficits from the Councils' general fund and covers the period of three financial years from 1st April 2020 to 31st March 2023.

3.15 Schools balances increased by £644k to £1.23m at the year-end. This increase is partly due to schools with deficits converting to academies and taking their deficit out of the LA schools balances. These balances are closely monitored by Schools Forum which has adopted an excessive balances policy in line with continued DFE best practise guidance. All schools with balances deemed to be excessive are challenged to explain their position. Most large balances are retained as part of plans for capital projects in schools.

Public Health

3.16 The Public Health budget is currently ringfenced. The year-end outturn was in line with the value of the grant funding, resulting in a balanced position against the value of this funding, including transfers to the Public Health Reserve. Reduced activity levels have been seen against some contracts due to the impact of the Covid-19 pandemic, this has resulted in a transfer to the Public Health reserve of £0.547m for use in future years. The revised balance held in the reserve is £0.589m as at 31st March 2021. Budgets have been adjusted to reflect the transfer from reserves.

Covid Grant Funding Summary

3.17 The following table provides a summary of the Government grant funding received during 2020/21 in respect of the Covid 19 pandemic. The majority of the funding has been utilised in the 2020/21 revenue outturn position. The unutilised balance on some grants has been transferred to earmarked reserves so they are available to fund costs arising in 2021/22.

Covid Grant Support 2020/21	Grant Rec'd £m	Utilised in 2020/21 £m	Balance trf to Reserves £m	Reserve
Covid 19 - Local Government Support Grant	11.94	11.94	0.00	
Sales, Fees and Charges Compensation Scheme	17.72	17.72	0.00	
Covid Winter Grant Scheme	0.50	0.50	0.00	
Test & Trace Support Scheme	0.26	0.14	0.12	Covid General Reserve
Contain Outbreak Management Fund	4.46	1.02	3.44	COMF Reserve
LA Test & Trace Support Grant (LOMP)	0.85	0.06	0.79	Test & Trace Reserve
Council Tax Hardship Grant	1.29	1.00	0.28	Covid General Reserve
Covid Rapid Testing Fund	0.56	0.56	0.00	
Covid Infection Control Grant	4.06	4.06	0.00	
Business Support Grants New Burdens Grant	0.25	0.03	0.21	Covid General Reserve
Coronavirus Job Retention Scheme Grant	0.56	0.56	0.00	
Other Grants	1.25	1.25	0.00	
Total	43.69	38.84	4.85	

Reserves and Flexible Capital Receipts

3.18 The year-end position of earmarked reserves, taking into account the 2020/21 outturn, are shown in the table below.

Council's Earmarked Reserves	£'m
<i>Corporate Earmarked Reserves</i>	
Insurance Fund	0.913
Capital Financing Reserve	10.092
Revenue Budget Contingency	6.238
Transformation Investment Reserve	3.130
Business Rates Reserve	6.495
City Deal Smoothing Reserve	1.635
Restructuring & Severance Reserve	2.183
Financial Planning and Smoothing Reserve	7.059
Invest to Save Reserve	0.350
Public Health Grant Reserve	0.589
Community Empowerment Fund	0.324
Revenue Grants Unapplied	0.725
Revenue Funding of Capital Reserve	0.547
Covid19 Outbreak Management Fund Grant Reserve	3.443
Covid 19 Test & Trace Reserve	0.790
Covid 19 General Reserve	0.615
Other	0.620
<i>Sub Total</i>	45.748

Council's Earmarked Reserves	£'m
S31 Business Rate Retail Relief Compensation Grant Reserve	39.045
Schools Balances	1.230
Service Specific Reserves	2.669
General Service Reserves	12.226
Total Earmarked Reserves	100.918
Reserve balances excludes any 2021/22 transfers agreed as part of the 2021/22 Budget Report and the transfers proposed in paragraph 3.9.	

Note: Some of the figures in this table are affected by rounding.

3.19 The S31 Business Rate Retail Relief Compensation Grant Reserve is a temporary reserve to manage the timing difference between the receipt of government grant funding in 2020/21 and the use of this grant to fund the associated Business Rate Collection Fund Deficit in 2021/22 as required under Collection Fund accounting regulations. Further detail is provided in paragraph 3.27.

3.20 The year-end position of uncommitted non-earmarked reserves was £13.5m in line with the risk assessed requirements of a range of £12.3m to £13.5m agreed in the 2020/21 Budget Report.

Flexible Use of Capital Receipts

3.21 Council approved a revised Efficiency Strategy in February 2021 as part of the 2021/22 budget. This enables the authority to utilise capital receipts for once-off spend such as severance costs that result in the delivery of ongoing savings. Flexible capital receipts of £0.1m were utilised in 2020/21 taking the total used to £7.93m and it is estimated that this spend will contribute to the release of ongoing revenue savings of £12.51m by 2021/22. Further details of spend and savings are shown in the following tables.

Category	Spend				
	2017/18 £m	2018/19 £m	2019/20 £m	2020/21 £m	Total £m
Restructuring & Severance Costs	3.124	3.045	0.955	0.096	7.220
Procurement, Commissioning and other service redesign	0.000	0.408	0.306	0.000	0.714
Total	3.124	3.453	1.261	0.096	7.934

Category	Cumulative Savings				
	2017/18 £m	2018/19 £m	2019/20 £m	2020/21 £m	2020/21 £m
Restructuring & Severance Costs	0.102	2.658	5.547	6.091	6.219
Procurement, Commissioning and other service redesign	0.000	3.425	6.127	6.290	6.290
Total	0.102	6.083	11.675	12.381	12.510

Council Tax, Business Rates and Collection Fund

Council Tax

3.22 Council tax collection improved steadily throughout the year. The income levels, when compared to payment rates for the same periods in 2019/20, have improved from an initial reduction of c8% in April to a final reduction of under 0.5% by the end of the year. This improvement has reduced the increase in the Bad Debt Provision that was being forecast at Quarter 3 benefitting the Collection Fund position by around £1m.

3.23 The Council has seen a large increase in the number of people claiming Local Council Tax Support since April. The 2020/21 tax base included an adjustment of £9.56m for the estimated costs of the LCTSS. At the end of the financial year the cost rose to £10.29m, an increase of £0.73m. The number of working age claimants at the end of March was 6,801 compared to the budget assumption of 5,939, an increase of c15%. The increase follows the national trend of increases in people claiming Universal Credit. The claimant level stabilised during the second half of the year and came in around £0.5m lower than the level that was being forecast at Quarter 3.

3.24 Taking both these improvements over Quarter 3 forecast into account, the final in year deficit on the Collection Fund in respect of Council Tax was £0.40m. This is partly offset by the £0.55m surplus carried forward from 2019/20, leaving a net surplus of £0.15m, of which the Council's share is £0.13m. This represents an improvement of £1.55m over the Quarter 3 forecast, of which the Council's share is £1.30m.

3.25 The Council has qualified for £0.77m compensation under the government's Council Tax Income Guarantee grant funding scheme reflecting the reductions in Council Tax income against the schemes baseline, mainly as a result of the increase in Local Council Tax Scheme Claimants during the year. The grant income has been transferred to the Financial Planning Reserve so it is available to support the smoothing of future years Medium Term Financial Strategy pressures.

Business Rates

3.26 The outturn position for the Business Rate element of the collection fund is a deficit of £0.8m, after allowing for additional s31 grant funding in respect of the

extended retail reliefs which were announced by government after the 2020/21 budgets were set. The table below shows the Council's share of the deficit is £0.5m. This represents an improvement over the Quarter 3 forecast position of £2.6m. The main reasons for the improved position were due to:

- a) a reduction in the required appeals provision transfer, mainly reflecting the government announcement that it will legislate to disallow appeals from businesses in respect of "Material Change of Circumstances" due to the impacts of the Covid pandemic (£1.1m), and
- b) lower than forecast business rates reliefs (Empty Property and Retail Relief) of £0.6m and Bad Debt Provision requirement of £0.6m.

Business Rates Collection Fund	Outturn Position		Qtr3 Forecast		Change
	Total (£m)	B&NES Share (£m)	Total (£m)	B&NES Share (£m)	B&NES Share (£m)
Collection Fund - Projected 2020/21 In Year Deficit	41.7	39.2	44.6	41.9	-2.7
Additional Extended Retail Relief Impact funded through s31 grant	-41.2	-39.0	-41.6	-39.1	0.1
Deficit after Extended Retail Relief s31 grant funding	0.5	0.2	3.0	2.8	-2.6
2019/20 Deficit carried Forward	0.3	0.3	0.3	0.3	0.0
Total Projected Deficit	0.8	0.5	3.3	3.1	-2.6

3.27 As set out in the Budget Report, the Council's share of the deficit that relates to the extended retail relief, which was introduced by government after the 2020/21 budget was set, is £39.0m. The s31 compensation grant in respect of this change was received in 2020/21 and has been transferred to the "S31 Business Rate Relief Compensation Grant Reserve" so it is available in 2021/22 to offset recovery of this element of the deficit. In addition to this, the Council holds a general Business Rates Reserve to ensure that the General Fund is not adversely impacted in any one year. Following outturn transfers, the balance of the Business Rate Reserve was £6.5m as at the 31st March 2021. The collection rate for Business Rates was 94.36% (98.06% 2019/20).

Overall Collection Fund

3.28 The following table shows the overall estimated position, for which provision was made in the 2021/22 Budget Report, and the actual outturn position for the Council share of the Collection Fund for 2020/21. These figures exclude preceptor shares:-

	Estimated Surplus/ (Deficit) £'m	Actual Surplus/ (Deficit) £'m	Difference £'m
Council Tax	(1.165)	0.132	1.297
Business Rates*	(3.206)	(0.479)	2.727
Total	(4.371)	(0.347)	4.024

*Net of Extended Retail Relief impact funded by grant (£39.05m)

3.29 At an overall level, the outturn position on the Collection Fund improved by £4.024m over the estimated position and this difference will be taken into consideration when estimating the closing 2021/22 Collection Fund position as part of the 2022/23 Budget process.

Council Tax Hardship Fund

3.30 Following the outbreak of Covid-19 and the advice of the UK Government on self-isolation and the temporary closure of Businesses and places of work, the Government made available a £500m Hardship fund for Local Authorities, with the expectation that it will primarily be used to provide Council tax relief under section 13A (1) (c) of the Local Government Finance Act 1992. The Council received £1,288,040 to fund the costs of these reliefs.

3.31 The government guidance gives minimum requirements expected of each local authority, which is to apply a further reduction of the lower amount of the claimant's residual Council tax liability or £150.00 to all recipients of working age local Council tax support (LCTS) during the financial year 2020/21.

3.32 The year end position is that reliefs totalling £1,004,085 have been applied to 7,636 Council Tax Accounts.

3.33 The remaining balance of grant funding has been carried forward to 2021/22 through the Council's Covid General Earmarked Reserve.

Business Support Grants

3.34 The Council has been responsible for the administration and processing of Business Grants to support local businesses on behalf of the Government. The series of grants were split into two lockdown periods and the tables below outline the type, number and value of the grants which the Council has administered and paid up to the 31st March 2021.

Grants covering May to September 2020

Grant Scheme	Grants Processed for Payment	Total Paid (£m)
Small Business Grants	2,140	21.40
Retail, Hospitality & Leisure Grants	984	19.38
Discretionary Grants (businesses not eligible for main grants)	346	2.11
Sub Total	3,470	42.89

Grants covering November 2020 to March 2021

Grant Scheme	Grants Processed for Payment	Total Paid (£m)
Covid-19 Additional Restrictions Grant	2,254	4.54
Local Restrictions Support Grant - Closed Lockdown	1,722	2.89
Local Restrictions Support Grant - Closed Tier 2	1,205	0.55
Local Restrictions Support Grant - Open	2,614	1.03
LRSB (Closed) Addendum: 5th January onwards	4,090	8.63
Closed Business Lockdown Payment	1,680	8.46
Sub Total	13,565	26.10

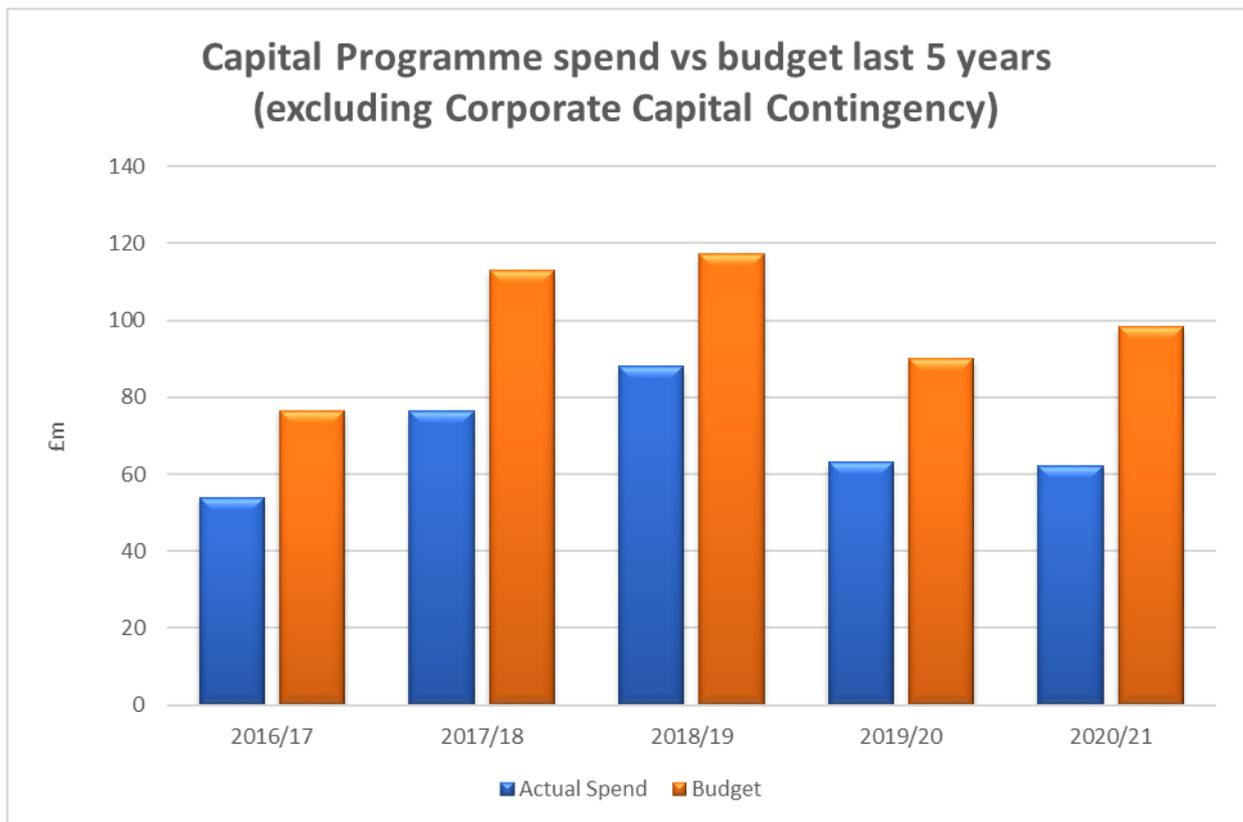
Overall Total Payments - 2020/21	17,035	68.99
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Capital Programme

3.35 The capital spend in 2020/21 was £62.202m (63%) against a budget of £98.230m giving a variance of £36.029m, primarily reflecting the delivery time to complete projects moving into future financial periods.

Portfolio Summary	2020/2021 Outturn Position			
	Capital Budget £'m	Outturn £'m	Variance £'m	Rephasing to 2021/22 Requested £'m
Resources & Deputy Leader	14.394	7.869	(6.525)	6.511
Adult Services	0.336	0.202	(134)	134
Children's Services	8.791	4.399	(4.391)	4.353
Climate Emergency & Neighbourhood Services	15.965	7.778	(8.187)	8.186
Transport Services	11.806	9.206	(2.600)	2.566
Housing, Planning & Economic Development	40.280	27.862	(12.418)	12.418
Community Services	6.659	4.886	(1.773)	1.746
TOTAL	98.230	62.202	36.029	35.916

3.36 Of this variance, £35.916m is requested for carry forward to 2021/22 to cover re-phased costs of capital projects. The detailed outturn position and re-phasing of each individual project is attached at Appendix 3. The delivery of the capital spend compared to budget over the last five years is shown in the following graph:



3.37 The funding of the capital programme for 2020/21 is as follows:-

	£'m
Total Capital Spending:	62.202
Funded by:	
Capital Receipts	0.644
Capital Grants	40.487
3 rd Party Receipts (inc S106 & CIL)	2.916
Revenue	0.503
Prudential Borrowing (Implied Need)	17.652
Total	62.202

3.38 The Council's provisional Capital Financing Requirement (CFR) as at 31st March 2021 is £326.9 million. This represents the Council's requirement to borrow to finance capital expenditure and demonstrates that total borrowing of £243.5 million remains well below this requirement as at 31st March 2021. This illustrates the extent to which the Council is currently cash-flowing capital projects in line with the Treasury Management Strategy to minimise borrowing costs.

4 STATUTORY CONSIDERATIONS

4.1 The annual Medium-Term Financial Strategy and planning process allocates resources across services with alignment of these resources towards the Council's corporate priorities. This report monitors how the Council has performed against the budget and Capital Programme set in February 2020.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 These are contained throughout the report and appendices.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

6.2 The substance of this report is part of the Council's risk management process. The key risks in the Council's budget were assessed by each Strategic Director, with these risks re-assessed on a monthly basis as part of the budget monitoring process.

7 CLIMATE CHANGE

7.1 The Medium Term Financial Strategy and budget process aligns resources towards the corporate priorities and objectives set out in the Corporate Strategy, which includes tackling the climate emergency. This report monitors the Council's financial performance against those budgets.

8 OTHER OPTIONS CONSIDERED

8.1 The option to carry forward over budgeted spend could be considered which would mean that services would have to make up any deficits in 2020/21 with a considerable impact on service delivery especially in light of the financial recovery measures already required in 2021/22 in respect of mitigating the financial impacts of Covid 19.

9 CONSULTATION

9.1 Consultation has been carried out with the Cabinet Member for Resources, Directors, Section 151 Finance Officer, Chief Executive, Chief Operating Officer and Monitoring Officer.

9.2 The provisional outturn position has been discussed at Senior Leadership Team and Corporate Management Team in May.

Contact person	Gary Adams – 01225 477107; Andy Rothery – 01225 477103; Gary_Adams@bathnes.gov.uk ; Andy_Rothery@bathnes.gov.uk
Background papers	2020/21 Budget Monitoring reports to the Cabinet; Revenue and Capital Budget Setting reports, Budget Management Scheme
Please contact the report author if you need to access this report in an alternative format	

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
Detailed Analysis of Budgets for the Leader							
P04	Leader	1112	Housing Delivery Vehicle	(1,000)	(886)	114	Lower than budgeted income returns from the Council's Housing Company
P04	Leader	1126	Visit Bath	367	878	511	Liabilities incurred from the closure of Visit Bath Ltd.
P04	Leader Total			(633)	(8)	625	
Detailed Analysis of Budgets for Resources and Deputy Leader							
P19	Resources and Deputy Leader	1032	Information Technology	4,928	5,395	466	Information Technology expenditure pressures due to additional demands on the service, which were a result of large sections of the organisation working remotely.
P19	Resources and Deputy Leader	1037	Property Services	667	574	(93)	A vacancy and staff savings from the Business Support team make up the majority of the underspend, along with departmental supplies and services budgets.
P19	Resources and Deputy Leader	1038	Corporate Estate Including R&M	3,494	3,433	(60)	An unachievable portion of the accommodation savings target of £350k is offset with Financial Recovery Plan savings, which included less spend on repairs and maintenance and office premises costs. £150k of income has been realised from Lewis House, but the service experienced excess costs of maintaining the BCA site of £110k. Loss of income from the Guildhall of £45k, mailroom pressures of £35k, and a cleaning surplus of £14k are other variances within the overall net favourable position.
P19	Resources and Deputy Leader	1039	Traded Services	24	4	(20)	A budget surplus has been realised after residual costs for Linear Way, unrecoverable debt write offs and costs for Larkhall. This budget will cease in 21/22 as part of savings plan. The whole Linear Way site has now been let, however Larkhall Kitchen is still subject to a Community Asset Transfer request/review.
P19	Resources and Deputy Leader	1040	Finance	3,069	2,916	(153)	The finance establishment operated with vacancies during 2020/21 to contribute to the financial recovery plan to help mitigate wider budget pressures.
P19	Resources and Deputy Leader	1041	Revenues & Benefits	797	738	(59)	Covid pressures on the Council were absorbed by the service resulting in a under budget position from additional grant income, this helped mitigate wider Council pressures.
P19	Resources and Deputy Leader	1042	Risk & Assurance Services	1,094	1,094	0	On budget.
P19	Resources and Deputy Leader	1045	Strategy & Performance	2,043	3,495	1,451	Procurement savings of £388k, and £750k Digital savings were not achievable due to focus and reprioritisation of Covid-19 recovery work. Costs associated with the financial recovery and planning for the future also contribute to outturn overspend.

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
P19	Resources and Deputy Leader	1047	Human Resources	1,565	1,469	(97)	A £150k organisation wide travel savings target currently sits in HR and shows as unachieved. However, a significant reduction in travel costs were realised within council services and the budgeted savings target will be re-allocated across the organisation in 2021/22 to reflect the reduced costs. In the meantime, the service's in year savings more than cover this, resulting in a small service underspend.
P19	Resources and Deputy Leader	1053	Council Solicitor & Democratic Services	2,571	2,516	(55)	Existing saving target around a shared legal service and members support are both unachievable and undesirable and are therefore being replaced with alternatives in the 2021/22 budget. These have been mitigated this financial year by savings in member allowances and vacancy management
P19	Resources and Deputy Leader	1054	Hsg / Council Tax Benefits Subsidy	(195)	340	535	1.£260k due to reduced subsidy i.e. where we cannot reclaim 100% subsidy i.e. B&B Temp accommodation & overpayments 2.£275k income shortfall due to non recoveries due to Covid impacts
P19	Resources and Deputy Leader	1055	Capital Financing / Interest	5,920	3,597	(2,323)	The overall underspend mainly relates to the reprofiling of capital spend to future years following the 2020/21 capital review resulting in rephasing of forecast borrowing, leading to lower than forecast
P19	Resources and Deputy Leader	1056	Unfunded Pensions	1,588	1,513	(75)	Lower than budgeted costs in respect of historic pension liabilities.
P19	Resources and Deputy Leader	1057	Corporate Budgets including Capital, Audit and Bank Charges	(9,370)	(23,662)	(14,293)	The total under budget position of £14.3m includes £12.4m as a result of the receipt of COVID-19 Support & Outbreak Management grants from MHCLG which are held corporately. These grants have funded the Covid pressures incurred across Council services as set out in this Appendix. In addition there were benefits from a £1.0m underspend in Corporate Supported Borrowing costs due to review & rephasing of Capital Programme and the £0.9m contingency budget for SEN (Special Education Needs) not being used. The main over budget item relates to the £616k shortfall of income from Bath Spa Profit Share due to the Covid-19 closure.
P19	Resources and Deputy Leader	1058	Magistrates	12	11	(1)	On budget.
P19	Resources and Deputy Leader	1059	Coroners	335	457	122	Additional spend resulting from Covid-19.
P19	Resources and Deputy Leader	1060	Environment Agency	244	244	0	On budget.
P19	Resources and Deputy Leader	1061	West of England Combined Authority Levy	5,048	4,821	(227)	The underspend relates to a rebate due from the West of England Combined Authority for the levy, following the underspend on concessionary fares in 2019/20.
P19	Resources and Deputy Leader	1081	Commercial Estate	(15,217)	(7,111)	8,106	The Council's Commercial Estate has been adversely impacted by Covid which has resulted in difficulties in letting units and also achieving pre-pandemic market rent levels. Debt recovery will be a priority for the service in 2021/22 to prevent further adverse impacts on the Council.
P19	Resources and Deputy Leader	1118	Procurement & Commissioning	228	190	(38)	Minor underspend.

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
P19	Resources and Deputy Leader	1125	Improving The Way we work	(210)	0	210	Corporate savings (Business Intelligence and Comms consolidation) have now been recognised as not achievable in current climate with refocus on recovery plans.
P19	Resources and Deputy Leader Total			8,635	2,033	(6,602)	
Detailed Analysis of Budgets for Adult Care Health and Wellbeing							
P20	Adult Services	1036	Adults Substance Misuse (DAT)	450	365	(85)	The underspend reflects planned savings.
P20	Adult Services	1073	Adults & Older People- Mental Health Commissioning	9,943	8,743	(1,199)	The underspend at outturn is due to lower activity levels during 2020-21 with hospital discharges being funded by the NHS, this resulted in lower numbers of placements. A number of further actions have taken place to drive change and achieve savings in line with recovery plans. This included targeted reviews and introduction of panels to examine all new requests for support ensuring that the care approved is the right care and funding.
P20	Adult Services	1086	Adult Care Commissioning	1,600	613	(987)	The underspend reflects vacancies held during the year and provisions that are no longer required being released for future use.
P20	Adult Services	1088	Older People & Physically Disabled Purchasing	12,047	11,010	(1,037)	Hospital discharges have been funded by an NHS funded pathway which has resulted in lower activity levels in year. The pandemic has also prevented people accessing community based day and respite services., resulting in lower activity levels. A number of actions have taken place to drive change and achieve savings in line with recovery plans, including the introduction of panels for all new requests for support to ensure that the care approved is the right care.
P20	Adult Services	1091	Learning Disabilities Commissioning	18,069	17,426	(643)	Reduction in 20/21 spend is due to a decreased demand for services due to the Covid-19 pandemic, day service closures, and reduced social care activity. The lockdown periods also prevented clients accessing respite support services.
P20	Adult Services	1093	Physical Disability, Hearing & Vision	4,074	3,250	(825)	Reduction in 20/21 spend is due to a decreased demand for services due to the Covid-19 pandemic, day service closures, and reduced social care activity. The lockdown periods also prevented clients accessing respite support services.
P20	Adult Services	1094	Public Health	(797)	(547)	250	The outturn spend position is in line with the value of the grant funding for Public Health and reflects a balanced position against this. The variance reflects the value of PH spend in other areas of the council. The budget has been amended in 2021-22 to reflect this.
P20	Adult Services	1110	Better Care Fund	5,867	6,471	605	This reflects the value of support to providers during the Covid period, by additional payment and payment for visits cancelled due to the impact of the Covid-19 pandemic.
P20	Adult Services	1113	CCG B&NES CHC and FNC Payments	0	0	0	On budget.

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
P20	Adult Services	1114	Community Equipment	203	203	0	On budget.
P20	Adult Services	1123	Safeguarding Adults	1,883	1,502	(381)	Vacancies held throughout the year and reduced fee activity seen due to the impact of the covid-19 pandemic.
P20	Adult Services	1124	Community Resource Centres & Extra Care Income	1,608	1,235	(373)	This resource became an in house service from October 2020 and was partially used as part of the NHS funded pathway for hospital discharges thus short term occupancy levels were higher than previously seen resulting in a positive impact on the cost of delivery.
P20	Adult Services Total			54,946	50,270	(4,675)	

Detailed Analysis of Budgets for Children's Services

P21	Children's Services	1076	Children, Young People & Families	15,899	17,938	2,039	Outturn includes £1.3m covid expenditure. Adjusting for this the Outturn is £734k over budget. The Outturn includes delivery of in-year Financial Recovery Savings of £437k, these have been mainly one-off savings delivered through service reviews, efficiency savings and one-off alternative funding. Excluding covid costs JAP (Joint Agency Panel) costs are £1.3m over budget and are £1.7m increased from last year. JAP costs have increased due to an exceptionally complex placement that is not typical of historical costs during 20/21, and annualisation costs of a significant number of placements that started towards the end of 19/20. Excluding covid costs Residential placement costs are £473k over budget and are £408k increased from last year. This is primarily due to an increase in the number of placements needed in this area, combined with costs associated with the complexity of provision needed for these most vulnerable of young people. JAP and Residential costs have been partially offset by £581k under budget positions across Foster Carer and Parent and Baby placements (excluding Covid costs). Foster Carer spend was reduced versus budget due to Covid affecting the recruitment of new Foster Carers. Parent and Baby spend was lower than budget due to the ongoing development and implementation of the Practice Framework.
P21	Children's Services	1077	Learning & Inclusion	3,274	3,123	(151)	The underspend is a result of the pandemic affecting the ability to delivery services as normal across Children's Centres, and across the Early Years area. This is a one-off saving for 20/21.

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
P21	Children's Services	1078	Health, Commissioning & Planning	6,796	6,800	4	Covid Costs of £257k are included within this cash limit. Excluding these, the cash limit Outturn position is £253k under budget. The Outturn includes delivery of £110k Financial Recovery Saving achieved, these are one-off savings. Home to School Transport was £379k under budget in 20/21 due to reduced spend whilst the majority of school children were not able to attend school during the pandemic, this is therefore a one-off saving. Offsetting these savings were over budget positions across various areas, the main areas of these being Childcare Vouchers income (£56k income reduction) due to reduced demand for these during the Pandemic and Service Supported Borrowing (£53k above budget).
P21	Children's Services	1079	Schools Budgets	2,353	2,353	(0)	This cash limit is has an Outturn on budget as SEN overspends are carried forward in the DSG reserve as part of the DSG accounting procedures. In 20/21 the DSG overspend was £4.2m, this added to the overspend from prior years, means the DSG total overspend carried forward is now £5.4m.
P21	Children's Services	1116	Integrated Commissioning - CYP	2,626	2,614	(11)	Delivery of in-year Financial Recovery Savings of £65k, reduced by £54k cost pressures across multiple commissions.
P21	Children's Services	1117	Safeguarding - CYP	10	7	(3)	Reduced expenditure to provide external training due to Covid.
P21	Children's Services Total			30,957	32,835	1,878	

Detailed Analysis of Budgets for Climate Emergency & Neighbourhood Services

P22	Climate Emergency & Neighbourhood Services	1101	Neighbourhoods & Environment - Waste & Fleet Services	16,282	16,445	164	There were three main drivers for the service overspend. Increased costs for additional staff required in the Collections and Recycling services for Lockdown 1 and 3. A loss of income in our trade waste service, and a fall in the worldwide market values for recycle. A significant increase in tonnages across all services during 20/21 and as a result we have seen an increase in operational costs and gate fees as a result.
P22	Climate Emergency & Neighbourhood Services	1120	Sustainability	511	212	(299)	Underspend as a result of delays to setting up the new team due to Covid, but is now in progress.
P22	Climate Emergency & Neighbourhood Services	1127	Air Pollution	210	183	(27)	Staffing underspends.
P22	Climate Emergency & Neighbourhood Services Total			17,003	16,840	(163)	

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
Detailed Analysis of Budgets for Transport Services							
P25	Transport Services	1006	Highways & Traffic Management	7,613	6,847	(766)	Highways have seen a reduction in permit income, which is being reimbursed from the government's Sales, Fees and Charges Scheme. All Recovery Plan savings have been achieved totalling £275k. The financial position improved further in the second half of the year as a result of vacancies and increased income.
P25	Transport Services	1103	Transport & Parking Services - Parking	(7,738)	(6,905)	833	Income has been reduced by as much as 80% through each lockdown. Income has improved slowly following an increase in visitors to the City Centre of Bath after each lockdown. £5.8m parking income has been lost with £3.9m being reimbursed from the government's Sales, Fees and Charges Compensation Scheme. Reduced expenditure and staff vacancy savings have contributed towards off setting the income losses. All Recovery Plan Savings have been realised.
P25	Transport Services	1104	Transport & Parking Services - Public & Passenger Transport	(670)	(970)	(300)	A reduction in advertising and concessionary fares income has created a slight pressure for Public Transport. Staff vacancy savings, a reduction in expenditure and furlough income all contributed to a favourable outturn position within Passenger Transport.
P25	Transport Services	1119	Emergency Planning	433	966	533	Overspend includes PPE costs and work on Temporary Resting Place at Haycombe Crematorium incurred as part of the council wide response to Covid-19.
P25	Transport Services	1129	Clean Air Zone	0	0	0	Clean Air Zone infrastructure complete. Implementation date 15th March 2021.
P25	Transport Services Total			(361)	(62)	300	
Detailed Analysis of Budgets for Housing, Planning & Economic Development							
P23	Housing, Planning & Economic Development	1029	Housing	1,674	1,157	(517)	The favourable variance has been caused by a number of factors, though primarily relates to around £353k of increased income generation. This has been created by: a successful MHCLG NSAP bid releasing committed funding; the transference of the Domestic Abuse Service funding to housing; and increased enabling fees & grant recovery. The remaining variance relates to project slippage, in part related to capacity and Covid issues.
P23	Housing, Planning & Economic Development	1052	Regeneration	301	89	(212)	£97k staff savings (includes £41k for the vacant director post), £39k additional project income, £41k unspent residual arts budget, £15k unspent training budget. Plus various smaller non material variances totalling £13.5k
P23	Housing, Planning & Economic Development	1106	Development Management	1,543	1,204	(339)	Unprecedented impact of Covid-19 restrictions has adversely affected all planning fee income streams. This has been partially mitigated by the MHCLG Fees and Charges Grant. Salary savings, advertising and consultants fees not spent plus various small favourable movements across the Planning service lead to a £262k favourable outturn position. £77k has been requested as a carry forward into 21/22 .

Appendix 1 - Revenue Monitoring Commentary Quarter 4 2020/21

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	2020/21 Outturn Variance Over / (Under) £000	Outturn Narrative
P23	Housing, Planning & Economic Development	1128	Business & Skills	482	378	(104)	£30k underspend on project budget with regard to COVID delays plus small underspends relating to Wansdyke Business Centre. £68k has been requested as a carry forward into 21/22 .
P23	Housing, Planning & Economic Development Total			4,001	2,829	(1,172)	
Detailed Analysis of Budgets for Community Services							
P24	Community Services	1005	Building Control & Land Charges	875	852	(23)	Income levels in Building Control, Land Charges and Licensing were reduced dramatically due to reduced economic activity in the early part of the year and reduced income received from the casino operator. This has been partially mitigated by the Sales, Fees and Charges (SFC) Compensation Scheme. Mitigating the loss of income and contributing to a final favourable outturn position are savings on staff costs (for various reasons) and an underspend in maintenance costs.
P24	Community Services	1018	Heritage	(9,682)	(6,141)	3,541	The Roman Baths was only open for 148 out of a planned 363 days, due to COVID lockdowns, and restrictions when open limited income generation. The service implemented savings plans and the government SFC and furlough schemes have also helped to mitigate the financial impact. The shortfall of £19.7m in external income translates to a profit shortfall of £3.5m against budget.
P24	Community Services	1019	Public Protection & Health Improvement - Leisure	1,476	2,263	786	Financial Support has been provided to leisure operator GLL for the period March 2020-March 2021 due to impacts of Covid-19 on the sector.
P24	Community Services	1089	Community Safety	193	186	(7)	No material variance. Full funding allowance has been committed
P24	Community Services	1102	Neighbourhoods & Environment - Parks & Bereavement Services	1,274	1,117	(157)	The underspend is due to achieving planned Recovery Plan savings as well as further savings as a result of vacancy management. These were partially offset by a loss of income at Parade Gardens from entrance fees.
P24	Community Services	1109	World Heritage	154	99	(55)	Savings on supplies and services identified as part of Council recovery plan
P24	Community Services	1115	Registrars Service	(75)	39	114	Lost ceremony income and certificates due to Covid-19.
P24	Community Services	1121	Events & Active Lifestyles	164	211	48	Loss of income for Events and Weddings for 20/21, partially reduced following a reimbursement from the government's Sales, Fees and Charges Compensation Scheme. Also pressure for two staff members transferring from Visit Bath
P24	Community Services	1122	Customer Services (Including Libraries)	2,262	2,098	(164)	Library closures during pandemic has resulted in some reduction of spend. General vacancy management has also contributed to the favourable position.
P24	Community Services Total			(3,359)	724	4,083	
Council Total				111,188	105,462	(5,727)	

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2020/21 Revenue Virements for INFORMATION

Appendix 2 (i)

REF NO	REASON / EXPLANATION	CABINET MEMBER	TRANSFER FROM	Income	Expenditure	CABINET MEMBER	TRANSFER TO	Income	Expenditure	DESCRIPTION	ONGOING EFFECTS
			CASHLIM	(£'s)	(£'s)	CASHLIM	(£'s)	(£'s)			
The following virements have either been previously approved, are technical in nature or are below limits within BMS that require approval, and therefore are reported for information only.											
INFO 20#32	Waste Operating Model	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		30,000	Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services		30,000	Transfer of funding from corporately held contingency budget to fund expenditure on Waste Operating Model, as agreed by Director of Finance.	Budget virement is one-off.
INFO 20#33	Waste Service Redesign	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		49,172	Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services		49,172	Transfer of corporately held budget for Waste Service Redesign to match 2020/21 spend in service.	Budget Virement is ongoing.
INFO 20#34	COVID Grant Funding of DSG Expenditure	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		586,106	Children's Services	Schools' Budget		586,106	Allocation of budget from Council received COVID-19 support grant to DSG, to cover COVID-19 related expenditure within the Schools' Cash Limit.	Budget virement is one-off.
INFO 20#35	St. Marks School Academy conversion	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		160,000	Children's Services	Schools' Budget		160,000	Transfer of funding from corporately held contingency budget to support the transfer of St. Mark's School to a Multi Academy Trust, as agreed by Director of Finance.	Budget virement is one-off.
INFO 20#36	Service Supported Borrowing Savings	Community Services Transport Services Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Parks & Bereavement Services Building Control & Public Protection Transport & Parking Services - Parking Neighbourhoods & Environment - Waste & Fleet Services		562 227 418 26,093	Resources	Capital Financing / Interest	27,300		One-off reduction in corporate income budget for Service Supported Borrowing, owing to delay in Capital expenditure due to COVID-19.	Budget virement is one-off.
INFO 20#37	Business Intelligence Centralisation - Information Technology	Resources	Information Technology		48,244	Resources	Strategy & Performance		48,244	Transfer of responsibility for System Designer post from Information Technology to Business Intelligence Team, as part of the Business Intelligence centralisation.	Budget Virement is ongoing.
INFO 20#38	IT Centralisation	Resources	Property Services		13,500	Resources	Information Technology		13,500	Transfer of service IT budgets in line with IT Services centralisation (Property Qube system).	Budget virement is ongoing.

REF NO	REASON / EXPLANATION	CABINET MEMBER	TRANSFER FROM	Income	Expenditure	CABINET MEMBER	TRANSFER TO	Income	Expenditure	DESCRIPTION	ONGOING EFFECTS
			CASHLIM	(£'s)	(£'s)		CASHLIM	(£'s)	(£'s)		
INFO 20#39	WECA Levy	Transport Services	Transport & Parking Services - Public & Passenger Transport		54,000	Resources	West of England Combined Authority Levy		54,000	Additional budget for Concessionary Fares paid as part of the WECA Levy, funded by contingency budget held in Passenger Transport.	Budget Virement is ongoing.
INFO 20#40	Business Intelligence Centralisation - Children's Services	Children's Services	Inclusion & Prevention		68,222	Resources	Strategy & Performance		68,222	Transfer of responsibility of Data Analyst posts from Children's Services to Business Intelligence Team, as part of the Business Intelligence centralisation.	Budget Virement is ongoing.
INFO 20#41	Parish Sweepers	Resources	Balances (Revenue Budget Contingency Reserve)		4,592	Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services		4,592	Drawdown from Revenue Budget Contingency Reserve.	Budget virement is one-off.
INFO 20#42	One-Off Headroom Underspend	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		250,000	Resources	Balances (Revenue Budget Contingency Reserve)		250,000	Transfer to Revenue Budget Contingency Reserve.	Budget virement is one-off.
INFO 20#43	Mental Health Capacity Act Underspend	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		445,000	Resources	Balances (Revenue Budget Contingency Reserve)		445,000	Transfer to Revenue Budget Contingency Reserve.	Budget virement is one-off.
INFO 20#44	Revenue Contingency Underspend	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		810,000	Resources	Balances (Revenue Budget Contingency Reserve)		810,000	Transfer to Revenue Budget Contingency Reserve.	Budget virement is one-off.
INFO 20#45	Combe Down Stone Mine Interpretation Centre	Resources	Balances (Earmarked Reserve)		5,458	Resources	Property Services		5,458	Drawdown of funding from CDSM Interpretation Centre Reserve.	Budget virement is one-off.
INFO 20#46	GDPR	Resources	Balances (Earmarked Reserve)		11,945	Resources	Risk & Assurance Services		11,945	Drawdown of funding from Audit Partnership Reserve.	Budget virement is one-off.
INFO 20#47	Combe Down Stone Mine 100 Year Grant Reserve Drawdown	Resources	Balances (Earmarked Reserve)		1,555	Resources	Corporate Estate Including R&M		1,555	Drawdown of funding from Combe Down Stone Mine Reserve.	Budget virement is one-off.
INFO 20#48	Community Contribution Fund	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		18,615	Resources	Balances (Earmarked Reserve)		18,615	Transfer to Community Contribution Fund Reserve.	Budget virement is one-off.

REF NO	REASON / EXPLANATION	CABINET MEMBER	TRANSFER FROM	Income	Expenditure	CABINET MEMBER	TRANSFER TO	Income	Expenditure	DESCRIPTION	ONGOING EFFECTS
			CASHLIM	(£'s)	(£'s)		CASHLIM	(£'s)	(£'s)		
INFO 20#49	Waste Re-provision Reserve Transfer	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		143,068	Resources	Balances (Earmarked Reserve)		143,068	Transfer to Waste Re-provision Reserve	Budget virement is one-off.
INFO 20#50	Business Rates Reserve Transfer	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		45,479	Resources	Balances (Earmarked Reserve)		45,479	Transfer to Business Rates Reserve	Budget virement is one-off.
INFO 20#51	Capital Financing	Resources	Capital Financing / Interest		1,757,803	Resources	Balances (Earmarked Reserve)		1,757,803	Transfer to Capital Financing Reserve	Budget virement is one-off.
INFO 20#52	Public Health Reserve Transfer	Adult Services	Public Health		547,379	Resources	Balances (Earmarked Reserve)		547,379	Transfer to Public Health Reserve	Budget virement is one-off.
INFO 20#53	Better Care Fund Underspend Reserve Transfer	Adult Services	Adult Services		1,925,615	Resources	Balances (Earmarked Reserve)		1,925,615	Transfer to Social Care Reserve	Budget virement is one-off.
INFO 20#54	Adult Social Care Precept Underspend	Adult Services	Adult Services		1,864,611	Resources	Balances (Earmarked Reserve)		1,864,611	Transfer to Social Care Reserve	Budget virement is one-off.
INFO 20#55	Integrated Care System Reserve Transfer	Adult Services	Adult Services		4,000,000	Resources	Balances (Earmarked Reserve)		4,000,000	Transfer to ICS Transformation Reserve	Budget virement is one-off.
INFO 20#56	Drug Action Team Reserve Transfer	Adult Services	Adult Substance Misuse (Drug Action Team)		63,507	Resources	Balances (Earmarked Reserve)		63,507	Transfer to Drug Action Team Reserve	Budget virement is one-off.
INFO 20#57	Parade Gardens Café	Community Services	Neighbourhoods & Environment - Parks & Bereavement Services		9,478	Resources	Balances (Earmarked Reserve)		9,478	Repayment to Invest to Save Reserve	Budget virement is one-off.
INFO 20#58	Waste Dilapidations	Resources	Balances (Earmarked Reserve)		38,145	Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services		38,145	Drawdown of funding from Waste Dilapidations Reserve.	Budget virement is one-off.

REF NO	REASON / EXPLANATION	CABINET MEMBER	TRANSFER FROM	Income	Expenditure	CABINET MEMBER	TRANSFER TO	Income	Expenditure	DESCRIPTION	ONGOING EFFECTS
			CASHLIM	(£'s)	(£'s)		CASHLIM	(£'s)	(£'s)		
INFO 20#59	Supported Bus Contracts	Transport Services	Transport & Parking Services - Public & Passenger Transport		155,184	Resources	Balances (Earmarked Reserve)		155,184	Transfer to Public Transport Reserve	Budget virement is one-off.
INFO 20#60	Leisure Contract Invest to Save	Resources	Balances (Earmarked Reserve)		557,700	Community Services	Leisure		557,700	Drawdown of funding from Invest To Save Reserve.	Budget virement is one-off.
INFO 20#61	Leisure Development Reserve	Resources	Balances (Earmarked Reserve)		417,217	Community Services	Leisure		417,217	Drawdown of funding from Leisure Development Reserve.	Budget virement is one-off.
INFO 20#62	COVID-19 Test & Trace Grant	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges	790,334		Resources	Balances (Earmarked Reserve)		790,334	Transfer to COVID-19 Test & Trace Reserve	Budget virement is one-off.
INFO 20#63	COVID-19 Contain Outbreak Management Fund	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges	3,442,882		Resources	Balances (Earmarked Reserve)		3,442,882	Transfer to COVID-19 Contain Outbreak Management Fund Reserve	Budget virement is one-off.
INFO 20#64	COVID-19 Grants	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges	496,355		Resources	Balances (Earmarked Reserve)		614,530	Transfer to COVID-19 Reserve	Budget virement is one-off.
			Revenues & Benefits	118,175							
INFO 20#64	Insurance Provision	Resources	Balances (Earmarked Reserve)		302,771	Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		302,771	Drawdown of funding from Insurance Fund Reserve.	Budget virement is one-off.
INFO 20#66	Revenue Grants Unapplied Reserve	Community Services	Building Control & Public Protection	9,376		Resources	Balances (Earmarked Reserve)		9,376	Transfer to Unused Revenue Grants Reserve	Budget virement is one-off.
INFO 20#67	Schools' Reserve Transfer	Children's Services	Schools' Budgets		644,566	Resources	Balances (Earmarked Reserve)		644,566	Transfer to Schools' Balances.	Budget virement is one-off.
INFO 20#68	DSG Overspend Reserve	Resources	Balances (Earmarked Reserve)		5,424,046	Children's Services	Schools' Budgets		5,424,046	Transfer of 2019/20 DSG overspend brought forward, plus 2020/21 DSG overspend to DSG Overspend Reserve	Budget virement is one-off.
OVERALL TOTALS				4,857,122	20,480,278			27,300	25,310,100		25,337,400

Portfolio Cash Limits 2020/21 - Revenue Budget

Appendix 2 (ii)

CABINET PORTFOLIO	Service	Feb'21 Cash Limits £'000	Technical Adjustments, below BMS limits or already agreed - shown for information £'000	Total Virements for Approval £'000	Final Outturn Cash Limits £'000
Leader	Housing Delivery Vehicle	(1,000)			(1,000)
	Visit Bath	367			367
	PORTFOLIO SUB TOTAL	(633)			(633)
Resources	Finance	3,069			3,069
	Risk & Assurance Services	1,082	12		1,094
	Procurement & Commissioning	228			228
	Revenues & Benefits	915	(118)		797
	Council Solicitor & Democratic Services	2,571			2,571
	Information Technology	4,963	(35)		4,928
	Strategy & Performance	1,927	116		2,043
	Human Resources & Organisational Development	1,565			1,565
	Improving The Way We Work	(210)			(210)
	Property Services	675	(8)		667
	Corporate Estate Including R&M	3,492	2		3,494
	Commercial Estate	(15,217)			(15,217)
	Traded Services	24			24
	Hsg / Council Tax Benefits Subsidy	(195)			(195)
	Capital Financing / Interest	7,650	(1,731)		5,920
	Unfunded Pensions	1,588			1,588
	Corporate Budgets incl. Capital, Audit & Bank Charges	3,282	(6,964)		(3,682)
	New Homes Bonus Grant	(5,688)			(5,688)
	Magistrates	12			12
	Coroners	335			335
Environment Agency	244			244	
West of England Combined Authority Levy	4,994	54		5,048	
	PORTFOLIO SUB TOTAL	17,307	(8,672)		8,635
Adult Services	Adult Services	63,083	(7,790)		55,293
	Adult Substance Misuse (Drug Action Team)	514	(64)		450
	Public Health	(250)	(547)		(797)
	PORTFOLIO SUB TOTAL	63,347	(8,401)		54,946
Children's Services	Children, Young People & Families	15,899			15,899
	Integrated Commissioning - CYP	2,626			2,626
	Safeguarding - CYP	10			10
	Inclusion & Prevention	3,342	(68)		3,274
	Education Transformation	6,796			6,796
	Schools Budget	(3,173)	5,526		2,353
	PORTFOLIO SUB TOTAL	25,499	5,457		30,957
Climate Emergency & Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services	16,186	96		16,282
	Sustainability	511			511
	Environmental Monitoring (Air Pollution)	210			210
	PORTFOLIO SUB TOTAL	16,907	96		17,003
Transport Services	Highways & Traffic Management	7,613			7,613
	Transport & Parking Services - Parking	(7,738)	()		(7,738)
	Transport & Parking Services - Public & Passenger Transport	(461)	(209)		(670)
	Emergency Planning	433			433
	PORTFOLIO SUB TOTAL	(152)	(210)		(361)
Housing, Planning & Economic Development	Housing	1,674			1,674
	Regeneration	301			301
	Development Management	1,543			1,543
	Business & Skills	482			482
	PORTFOLIO SUB TOTAL	4,001			4,001

CABINET PORTFOLIO	Service	Feb'21 Cash Limits	Technical Adjustments, below BMS limits or already agreed - shown for information	Total Virements for Approval	Final Outturn Cash Limits
		£'000	£'000	£'000	£'000
Community Services	Building Control & Public Protection	884	(10)		875
	Heritage	(9,682)			(9,682)
	Leisure	702	775		1,476
	Community Safety	193			193
	Neighbourhoods & Environment - Parks & Bereavement Services	1,284	(10)		1,274
	World Heritage	154			154
	Registrars Service	(75)			(75)
	Events & Active Lifestyles	164			164
	Customer Services (including Libraries)	2,262			2,262
	PORTFOLIO SUB TOTAL	(4,114)	755		(3,359)
	NET BUDGET	122,162	(10,974)		111,188

Sources of Funding

Council Tax	97,436			97,436
Retained Business Rates*	23,209			23,209
Collection Fund Deficit (-) or Surplus (+)	2,225			2,225
Balances	(708)	(10,974)		(11,682)
Total	122,162	(10,974)		111,188

Approved Schemes - Detailed Capital Variance and Re-phasing Requests 2020/21

Appendix 3

Revised Capital Cash Limits by Portfolio

Capital Scheme	Final Budget at Outturn	Outturn	Variance	Re-phase Request	Commentary
	£'000	£'000	£'000	£'000	
Resources and Deputy Leader					
Agresso System Development & Upgrade	15	5	10	10	Multi year programme; re-phasing to 2021/22
Bath Area Forum - CIL Funded Schemes - Approved	428	123	305	305	Rolling programme, delivery continues into 2021/22
Capital Contingency	1,764	0	1,764	1,764	Rolling programme, delivery continues into 2021/22
Cleveland Pools Grant	10	3	7	7	Multi year programme; re-phasing to 2021/22
Commercial Estate Refurbishment Programme	571	227	344	344	Rolling programme, delivery continues into 2021/22
Corporate Estate Planned Maintenance	3,730	2,115	1,615	1,615	Rolling programme, delivery continues into 2021/22
Customer Payments Security and Channel Shift	115	119	-4	-4	Multi year programme; re-phasing to 2021/22
Digital Programme	24	26	-2	0	Scheme completed; no re-phase required
Equality Act Works	175	72	103	103	Multi year programme; re-phasing to 2021/22
Flexible Use of Capital Receipts	500	96	404	404	Rolling programme, delivery continues into 2021/22
Grand Parade & Undercroft	138	5	133	133	Multi year programme; re-phasing to 2021/22
Houseing Delivery Vehicle	617	364	252	252	Rolling programme, delivery continues into 2021/22
IT Asset Refresh	204	238	-34	-34	Rolling programme, delivery continues into 2021/22
Keynsham Regeneration & New Build	68	0	68	68	Multi year programme; re-phasing to 2021/22
Office Reconfiguration Costs	50	62	-12	-12	Multi year programme; re-phasing to 2021/22
Preparing for the Future - New Technology	355	355	0	0	
Project Inception Fund	16	3	13	13	Multi year programme; re-phasing to 2021/22
Property Company Investment	4,156	3,499	657	657	Rolling programme, delivery continues into 2021/22
Property Disposals	831	184	647	647	Rolling programme, delivery continues into 2021/22
Property Improvement - Haycombe Crematorium Dignified Entrance	0	14	-14	-14	Multi year programme; re-phasing to 20/21
Property Improvement - Orange Grove Structural Works	140	137	3	3	Multi year programme; re-phasing to 2021/22
Refresh of Network Switch Equipment	80	80	0	0	
Voicemail Upgrade	50	42	8	8	Multi year programme; re-phasing to 2021/22
Workplaces Programme Delivery	0	-15	15	0	Scheme completed; no re-phase required
York Street Vaults Phase 2	357	115	242	242	Multi year programme; re-phasing to 2021/22
Subtotal Full Approval - Resources and Deputy Leader	14,394	7,869	6,525	6,511	

Approved Schemes - Detailed Capital Variance and Re-phasing Requests 2020/21

Revised Capital Cash Limits by Portfolio

Capital Scheme	Final Budget at Outturn	Outturn	Variance	Re-phase Request	Commentary
	£'000	£'000	£'000	£'000	
Adult Services					
Adult Social Care Database Replacement	90	18	72	72	Multi year programme; re-phasing to 20/21
Community Resource Centre Capital Investment	246	184	62	62	Multi year programme; re-phasing to 20/21
Subtotal Full Approval - Adult Services	336	202	134	134	
Children's Services					
Basic Needs - School Improvement / Expansion	5,654	3,268	2,386	2,386	Rolling programme, delivery continues into 2021/22
Children's Education Management System	35	35	0	0	
Children's Centre Capital Schemes	58	32	27	27	Multi year programme; re-phasing to 2021/22
Schools' Capital Maintenance Schemes	1,613	377	1,236	1,236	Rolling programme, delivery continues into 2021/22
Schools Devolved Capital	154	132	21	21	Rolling programme, delivery continues into 2021/22
Special Education Needs & Disability (SEND) Education Provision	1,238	554	683	683	Rolling programme, delivery continues into 2021/22
Youth Service Capital Schemes	38	0	38	0	Scheme completed; no re-phase required
Subtotal Full Approval - Children's Services	8,791	4,399	4,391	4,353	
Climate Emergency and Neighbourhood Services					
Clean Air Zone	11,765	5,217	6,548	6,548	Multi year programme; re-phasing to 2021/22
Environmental Protection Vehicles	10	0	10	10	Rolling programme, delivery continues into 2021/22
Neighbourhood Services - Asset & Vehicle Replacement Programme	1,880	1,165	715	715	Rolling programme, delivery continues into 2021/22
Neighbourhoods Bin & Bench Replacement	9	9	0	0	
Tree Planting	119	0	119	119	Multi year programme; re-phasing to 2021/22
Waste Collection Vehicles In Cab Technology	177	53	124	124	Multi year programme; re-phasing to 2021/22
Waste Service Redesign	56	1	55	55	Multi year programme; re-phasing to 2021/22
Waste Depot Relocation	1,767	1,208	558	558	Multi year programme; re-phasing to 2021/22
Waste Welfare Facilities	183	125	58	58	Multi year programme; re-phasing to 2021/22
Subtotal Full Approval - Climate Emergency and Neighbourhood Services	15,965	7,778	8,187	8,186	

Approved Schemes - Detailed Capital Variance and Re-phasing Requests 2020/21

Revised Capital Cash Limits by Portfolio

Capital Scheme	Final Budget at Outturn	Outturn	Variance	Re-phase Request	Commentary
	£'000	£'000	£'000	£'000	
Transport Services					
Bath Transport Package Main Scheme	1,702	83	1,619	1,619	Multi year programme; re-phasing to 2021/22
City Centre Security	118	199	-81	-81	Multi year programme; re-phasing to 2021/22
Clutton Depot Refurbishment	184	184	1	1	Multi year programme; re-phasing to 2021/22
Chew Valley Recreational Trail	2	2	0	0	
Hicks Gate Roundabout Improvement	76	71	5	5	Multi year programme; re-phasing to 2021/22
Highways & Traffic Fleet Vehicle Renewal	164	127	38	38	Multi year programme; re-phasing to 2021/22
Highways Maintenance Programme	6,661	6,633	28	28	Rolling programme, delivery continues into 2021/22
London Road Modification	3	5	-2	-2	Multi year programme; re-phasing to 2021/22
Office for Low Emission Vehicles (OLEV) Bid	732	337	395	395	Multi year programme; re-phasing to 2021/22
Parking Vehicle Replacement Programme	33	0	33	33	Rolling programme, delivery continues into 2021/22
Passenger Transport Vehicles	6	0	6	6	Rolling programme, delivery continues into 2021/22
Somerdale Bridge, Keynsham – Initial Options Study	0	0	0	0	
Street Lighting LED Replacement Programme	0	3	-3	-3	Multi year programme; re-phasing to 2021/22
Transport Improvement Programme	2,122	1,563	559	525	Rolling programme, delivery continues into 2021/22
Subtotal Full Approval - Transport Services	11,806	9,206	2,600	2,566	

Approved Schemes - Detailed Capital Variance and Re-phasing Requests 2020/21

Appendix 3

Revised Capital Cash Limits by Portfolio

Capital Scheme	Final Budget at Outturn	Outturn	Variance	Re-phase Request	Commentary
	£'000	£'000	£'000	£'000	
Housing, Planning and Economic Development					
Affordable Housing	579	0	580	580	Rolling programme, delivery continues into 2021/22
Affordable Warmth Grant Scheme	580	331	249	249	Rolling programme, delivery continues into 2021/22
Bath Quays Bridge & Linking Infrastructure	3,743	1,478	2,265	2,265	Rolling programme, delivery continues into 2021/22
Bath Quays North	7,674	2,946	4,728	4,728	Rolling programme, delivery continues into 2021/22
Bath Quays South	13,193	11,992	1,201	1,201	Rolling programme, delivery continues into 2021/22
Bath City Centre Renewal Programme	169	121	48	48	Rolling programme, delivery continues into 2021/22
BWR Phase 2	2,854	3,153	-299	-299	Rolling programme, delivery continues into 2021/22
Digital B&NES	258	150	108	108	Rolling programme, delivery continues into 2021/22
Disabled Facilities Grant	1,681	778	904	904	Rolling programme, delivery continues into 2021/22
Englishcombe Lane Development	300	2	298	298	Rolling programme, delivery continues into 2021/22
Innovation Quay - Strategic Flooding Solution	90	91	-1	-1	Rolling programme, delivery continues into 2021/22
Keynsham High Street Renewal Programme	565	231	334	334	Rolling programme, delivery continues into 2021/22
Woodsomer Norton High Street Renewal Programme	127	78	49	49	Rolling programme, delivery continues into 2021/22
Next Steps Accommodation Programme	1,590	461	1,129	1,129	Rolling programme, delivery continues into 2021/22
North Keynsham SDL	5,767	5,508	259	259	Rolling programme, delivery continues into 2021/22
NRR Infrastructure	115	0	115	115	Rolling programme, delivery continues into 2021/22
Radstock & Westfield Implementation Plan	7	4	3	3	Rolling programme, delivery continues into 2021/22
Radstock Healthy Living Centre	244	125	119	119	Rolling programme, delivery continues into 2021/22
Saw Close Works	19	5	14	14	Rolling programme, delivery continues into 2021/22
Sladebrook Road: Energy Efficiency Measures	128	128	0	0	
Somer Valley Enterprise Zone - Infrastructure	592	281	311	311	Rolling programme, delivery continues into 2021/22
Waterspace	5	0	5	5	Rolling programme, delivery continues into 2021/22
Subtotal Full Approval - Housing, Planning and Economic Development	40,280	27,862	12,418	12,418	
Community Services					
Alice Park - Skate Park	123	82	42	42	Multi year programme; re-phasing to 2021/22
Bath Leisure Centre Refurbishment	420	32	388	388	Scheme complete; rephase to 2021/22
Bathscape	40	10	30	30	Multi year programme; re-phasing to 2021/22
Beechen Cliff Woodland & Other Open Spaces Improvements	22	15	7	6	Multi year programme; re-phasing to 2021/22
Haycombe Crematorium	78	44	34	34	Multi year programme; re-phasing to 2021/22
Heritage Infrastructure Development	55	45	10	10	Multi year programme; re-phasing to 2021/22

Approved Schemes - Detailed Capital Variance and Re-phasing Requests 2020/21

Revised Capital Cash Limits by Portfolio

Capital Scheme	Final Budget at Outturn	Outturn	Variance	Re-phase Request	Commentary
	£'000	£'000	£'000	£'000	
Heritage Services Energy Capture Scheme	5	12	-7	-7	Multi year programme; re-phasing to 2021/22
Leisure - Council Client / Contingency	156	0	156	156	Scheme complete; rephase to 2021/22
Leisure Bath - Car Park	2	0	2	2	Scheme complete; rephase to 2021/22
Leisure Facility Modernisation - Keynsham Sports Centre	394	308	86	86	Multi year programme; re-phasing to 2021/22
Modern Libraries & Workplaces	28	1	27	0	Scheme completed; no re-phase required
Parade Gardens Infrastructure for Business Development	-2	0	-2	0	Scheme completed; no re-phase required
Parks and Bereavement Infrastructure	72	21	51	51	Rolling programme, delivery continues into 2021/22
Parks Equipment Replacement Programme	20	14	6	6	Rolling programme, delivery continues into 2021/22
Parks S106 Projects	294	179	115	115	Rolling programme, delivery continues into 2021/22
Play Area Refurbishment / Equipment	254	88	165	165	Rolling programme, delivery continues into 2021/22
Public Tennis Improvements	544	109	434	434	Multi year programme; re-phasing to 2021/22
Roman Baths Archway Centre	3,354	3,298	56	56	Multi year programme; re-phasing to 2021/22
Sydney Gardens	800	628	172	172	Multi year programme; re-phasing to 2021/22
Subtotal Full Approval - Community Services	6,659	4,886	1,773	1,746	
TOTAL CAPITAL PROGRAMME	98,230	62,202	36,029	35,916	

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REF NO	REASON / EXPLANATION	TRANSFER / FUNDING FROM	Income (£'s)	Expenditure (£'s)	TRANSFER TO	Income (£'s)	Expenditure (£'s)	Notes
CAP20#077-2020	Affordable Warmth Grant Scheme	Govt grant, revenue	580,000		Housing, Planning and Economic Dev		580,000	Officer Delegated Decision on 20.1.2021 with approval from the Director of Economy and Growth to provide households with efficiency heat upgrades and low carbon funded by government grant.
CAP20#078-2020	Project Inception Fund	CSB	16,000		Resources & Deputy Leader		16,000	Officer Delegated Decision on 7.1.2021. Chief Operating Officer to pursue survey work at Entry Hill ahead of finalising lease for a new operator for Golf Course site.
CAP20#079-2020	Schools Capital Maintenance Schemes	3rd Party Contribs	4,129		Children Services		4,129	Technical Adjustment to increase in budget to reflect contribution from insurance claim towards the roof leak at Newbridge Primary School.
CAP20#080-2020	Next Steps Accommodation Programme	Govt grant, SSB, Capital Receipts	1,590,000		Housing, Planning and Economic Dev		1,590,000	Decision E3263 on 19.1.21 for Next Steps Accommodation Programme funding including Governor Place and Platform for Life. This funding will enable the delivery of up to 28 units of accommodation for former rough sleepers.
CAP20#081-2020	Parks S106 Projects	3rd Party Contribs	5,000		Community Services		5,000	Technical Adjustment for contribution from National Heritage Ironwork Group for bandstand works in Parade Gardens.
CAP20#082-2020	Tree Planting	Govt grant	44,579		Climate Emergency & Neighbourhood Services		44,579	Technical Adjustment to increase budget from grants awarded from Greenspace & Urban Roadside Trees.
CAP20#083-2020	Office Reconfiguration Costs	CSB	50,000		Resources & Deputy Leader		50,000	Officer Delegated Decision on 19.2.2021 by Chief Operating Officer to complete early concept planning design work for redesign of Keynsham Civic Centre.
CAP20#084-2020	Commercial Estate Refurbishment Programme	SSB, CSB	740,477		Resources & Deputy Leader		740,477	Officer Delegated Decision on 26.2.2021 by Chief Operating Officer to refurbish empty council owned commercial property. Future rental income will help to support Council services.
CAP20#085-2020	Parks S106 Projects	3rd Party Contribs	825		Community Services		825	Technical Adjustment for contribution from London Road Partnership(LRP) to fund bench purchase at Kensington Meadows.
CAP20#086-2020	Tree Planting	Developer Contribution - CIL	50,000		Climate Emergency & Neighbourhood Services		50,000	Officer Delegated Decision on 8.2.2021 by Director of Development and Public Protection to pursue Tree & Woodland Delivery Plan
CAP20#087-2020	Tree Planting	Revenue	24,000		Climate Emergency & Neighbourhood Services		24,000	Technical Adjustment to consolidate capital project costs of Tree and Woodland Delivery Plan.
CAP20#088-2020	Commercial Estate Refurbishment Programme	CSB	10,000		Resources & Deputy Leader		10,000	Officer Delegated Decision on 17.3.2021 by Chief Operating Officer to establish future uses of the Abbey Chambers in Bath.
CAP20#089-2020	Basic Needs - School Improvement / Expansion	Govt grant	-189,401		Children Services		-189,401	Technical Adjustment for various schemes including Salford Primary and St Mary's Writhlington now completed with excess funds returning back into the provisional programme.
CAP20#090-2020	Office for Low Emission Vehicles (OLEV) Bid	Govt grant	96,655		Transport Services		96,655	Technical Adjustment to realign budgets to grant award
CAP20#091-2020	North Keynsham SDL	WECA grant	5,675,000		Housing, Planning and Economic Dev		5,675,000	Officer Delegated Decision on 2.3.2021 by Director of Partnerships and Corporate Services for the purchase of land at North Keynsham & associated costs.
CAP20#092-2020	BAF CIL Funded - Approved	Bath CIL	110,641		Resources & Deputy Leader		110,641	Technical Adjustment from reconciliation of budget to offers made.
CAP20#093-2020	Transport Improvement Programme	WECA grant	198,437		Transport Services		198,437	Technical Adjustment to reflect award of Tranche 1 WECA Grant towards Emergency Active Travel in 2020/21.
CAP20#094-2020	Schools Capital Maintenance Schemes	Govt grant	-20,178		Children Services		-20,178	Technical Adjustment for various schemes now completed with excess funds returning back into the provisional programme.
CAP20#095-2020	Schools Devolved Capital Grant	Govt grant	306,379		Children Services		306,379	Technical Adjustment to align to Grant Award Announcement
CAP20#096-2020	Roman Baths Archway Centre	SSB, 3rd party contrib.	48,000		Community Services		48,000	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151) to reflect alignment of budget to various funding including Heritage Lottery Grant
CAP20#097-2020	Commercial Estate Refurbishment Programme	CSB	122,667		Resources & Deputy Leader		122,667	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151)for the essential Riverside Suite structural safety works
CAP20#098-2020	Capital Contingency	CSB	-122,667		Resources & Deputy Leader		-122,667	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151)for the essential Riverside Suite structural safety works
CAP20#099-2020	Preparing for the Future - New Technology	Revenue	355,000		Resources & Deputy Leader		355,000	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151) to purchase of IT assets to facilitate new blended working practises
CAP20#0100-2020	Property Improvement - Orange Grove Structural Works	CSB	140,000		Resources & Deputy Leader		140,000	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151) to address and prevent progressive structural decay of the Grade 11 Listed Building in Orange Grove.
Total			9,835,543				9,835,543	
			9,835,543				9,835,543	

Capital Virements - Additions & Reductions Future Years

Appendix 4 (i)

REF NO	REASON / EXPLANATION	TRANSFER / FUNDING SRC	Income (£'s)	Expenditure (£'s)	TRANSFER TO	Income (£'s)	Expenditure (£'s)	Notes
CAP20#034-FY	Bathscape	3rd Party Contribs	-20,030		Community Services		-20,030	Technical Adjustment to reconcile to grant funding available.
CAP20#035-FY	Next Steps Accommodation Programme	Govt Grant	810,000		Housing, Planning and Economic Dev		810,000	Decision E3263 on 19.1.21 for Next Steps Accommodation Programme funding, including £1.633m grant funding. This funding will enable the delivery of up to 28 units of accommodation for former rough sleepers.
CAP20#036-FY	Heritage Infrastructure Development	SSB	10,700		Community Services		10,700	Officer Delegated Decision on 08.03.2021 by Director of Finance to purchase Heritage Retail Tiles.
CAP20#037-FY	Tree Planting	Developer Cont - CIL	25,000		Climate Emergency & Neighbourhood Services		25,000	Officer Delegated Decision on 8.2.2021 by Director of Development and Public Protection to pursue Tree & Woodland Delivery Plan
CAP20#038-FY	North Keynsham SDL	WECA grant	300,000		Housing, Planning and Economic Dev		300,000	Officer Delegated Decision on 2.3.2021 by Director of Partnerships and Corporate Services for the development of land at North Keynsham.
CAP20#039-FY	Roman Baths Archway Centre	SSB, 3rd party contrib., Gov grant	363,000		Community Services		363,000	Budget Reallocated - Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151)
CAP20#040-FY	Property Improvement - Orange Grove Structural Works	CSB	760,000		Resources & Deputy Leader		760,000	Officer Delegated Decision on 2.6.2021 by Chief Financial Officer (s151) to address and prevent progressive structural decay of the Grade 11 Listed Building in Orange Grove.
OVERALL TOTALS			2,248,670	2,248,670			2,248,670	

Revised Capital Cash Limits by Portfolio

Capital Scheme	Cap Prog Number	Revised Budget After February Cabinet	Approvals To Overturn	Final Budget at Overturn
		£'000	£'000	£'000
Full Approval				
Resources and Deputy Leader				
Agresso System Development & Upgrade	Cap1415125	15	0	15
Bath Area Forum - CIL Funded Schemes - Approved	Cap1718068	318	111	428
Capital Contingency	Cap1415131	1,887	-123	1,764
Cleveland Pools Grant	Cap1718065	10	0	10
Commercial Estate Acquisitions	Cap1415100	0	0	0
Commercial Estate Refurbishment Programme	Cap1920022	-303	873	571
Corporate Estate Planned Maintenance	Cap1415097	3,731	0	3,731
Customer Payments Security and Channel Shift	Cap1920021	115	0	115
Digital Programme	Cap1718059	24	0	24
Equality Act Works	Cap1415104	175	0	175
Flexible Use of Capital Receipts	Cap1819080	500	0	500
Grand Parade & Undercroft	Cap1415103	138	0	138
Housing Delivery Vehicle	Cap1516042	617	0	617
IT Asset Refresh	Cap1819061	204	0	204
Keynsham Regeneration & New Build	Cap1415094	68	0	68
Office Reconfiguration Costs	CAP2122005	0	50	50
Preparing for the Future - New Technology	cap2122020	0	355	355
Project Inception Fund	Cap1819062	0	16	16
Property Company Investment	Cap1617027	4,156	0	4,156
Property Disposals	Cap1415098	831	0	831
Property Improvement - Haycombe Crematorium Dignified Entrance	CAP1920047	0	0	0
Property Improvement - Orange Grove Structural Works	CAP1920036	0	140	140
Refresh of Network Switch Equipment	CAP1920037	80	0	80
Voicemail Upgrade	CAP1920038	50	0	50
Workplaces Programme Delivery	Cap1415093	0	0	0
York Street Vaults Phase 2	Cap1819059	357	0	357
Subtotal Full Approval - Resources and Deputy Leader		12,972	1,422	14,394
Adult Services				
Adult Social Care Database Replacement	Cap1516005	90	0	90
Community Resource Centre Capital Investment	Cap1718076	246	0	246
Drugs and Alcohol Recovery House Public Health Grant	Cap1718074	0	0	0
Subtotal Full Approval - Adult Services		336	0	336
Children's Services				
Basic Needs - School Improvement / Expansion	Cap1415135	5,844	-189	5,654
Building Adaptations to Provide Short Breaks for Disabled Children	Cap1415078	0	0	0
Children's Education Management System	Cap1516009	35	0	35
Children's Centre Capital Schemes	Cap1415196	58	0	58
Schools' Capital Maintenance Schemes	Cap1415073	1,630	-16	1,613
Schools Devolved Capital	Cap1920028	-153	306	154
Special Education Needs & Disability (SEND) Education Provision	Cap1718071	1,238	0	1,238
Youth Service Capital Schemes	Cap1415167	38	0	38
Subtotal Full Approval - Children's Services		8,690	101	8,791

Revised Capital Cash Limits by Portfolio

Capital Scheme	Cap Prog Number	Revised Budget After February Cabinet	Approvals To Outturn	Final Budget at Outturn
		£'000	£'000	£'000
Climate Emergency and Neighbourhood Services				
Air Quality Management Area	Cap1819028	0	0	0
Clean Air Zone	Cap1920031	11,765	0	11,765
Environmental Protection Vehicles	Cap1516028	10	0	10
Neighbourhood Services - Asset & Vehicle Replacement Programme	Cap1718036	1,880	0	1,880
Neighbourhoods Bin & Bench Replacement	Cap1415029	9	0	9
Tree Planting	CAP2021005	0	119	119
Waste Collection Vehicles In Cab Technology	Cap1920025	177	0	177
Waste Service Redesign	Cap1617032	56	0	56
Waste Depot Relocation	Cap1516011	1,767	0	1,767
Waste Welfare Facilities	Cap2021003	183	0	183
Subtotal Full Approval - Climate Emergency and Neighbourhood Services		15,846	119	15,965
Transport Services				
A37 to A362 Improvements to Access Somer Valley Enterprise Zone	Cap1718084	0	0	0
Bath Transport Package Main Scheme	Cap1415001	1,702	0	1,702
City Centre Security	Cap1920027	118	0	118
Clutton Depot Refurbishment	Cap1920032	184	0	184
Chew Valley Recreational Trail	Cap1819090	2	0	2
Hicks Gate Roundabout Improvement	Cap1718085	76	0	76
Highways & Traffic Fleet Vehicle Renewal	Cap1920015	164	0	164
Highways Maintenance Programme	Cap1415184	6,661	0	6,661
London Road Modification	Cap1718022	3	0	3
Office for Low Emission Vehicles (OLEV) Bid	Cap1617008	636	97	732
Parking Vehicle Replacement Programme	Cap1415023	33	0	33
Passenger Transport Vehicles	Cap1516007	6	0	6
Somerdale Bridge, Keynsham – Initial Options Study	Cap1718016	0	0	0
Street Lighting LED Replacement Programme	Cap1617011	0	0	0
Transport Improvement Programme	Cap1415009	1,924	198	2,122
Speed camera	Cap1617012	0	0	0
Subtotal Full Approval - Transport Services		11,510	295	11,806

Revised Capital Cash Limits by Portfolio

Capital Scheme	Cap Prog Number	Revised Budget After February Cabinet	Approvals To Outturn	Final Budget at Outturn
		£'000	£'000	£'000
Housing, Planning and Economic Development				
Affordable Housing	Cap1415091	579	0	579
Affordable Warmth Grant Scheme	Cap2021004	0	580	580
Bath Quays Bridge & Linking Infrastructure	Cap1617037	3,743	0	3,743
Bath Quays North	Cap1415114	7,674	0	7,674
Bath Quays South	Cap1415138	13,193	0	13,193
Bath Streetspace	Cap1920026	169	0	169
BWR - Council Project Team	Cap1415057	0	0	0
BWR - Infrastructure	Cap1415059	0	0	0
BWR - Relocation of Gas Holders	Cap1415065	0	0	0
BWR Phase 2	Cap1920012	2,854	0	2,854
Digital B&NES	Cap1415069	258	0	258
Disabled Facilities Grant	Cap1415089	1,681	0	1,681
Englishcombe Lane Development	Cap1920034	300	0	300
Innovation Quay - Strategic Flooding Solution	Cap1415064	90	0	90
Keynsham High Street Renewal Programme	Cap1718011	565	0	565
Midsomer Norton High Street Renewal Programme	Cap1819050	127	0	127
Next Steps Accommodation Programme	Cap2021006	0	1,590	1,590
North Keynsham SDL	Cap1819091	92	5,675	5,767
NRR Infrastructure	Cap1415062	115	0	115
Radstock & Westfield Implementation Plan	Cap1516014	7	0	7
Radstock Healthy Living Centre	Cap1718061	244	0	244
Saw Close Works	Cap1516008	19	0	19
Sladebrook Road: Energy Efficiency Measures	Cap1920033	128	0	128
Somer Valley Enterprise Zone - Infrastructure	Cap1718067	592	0	592
Waterspace	Cap1920029	5	0	5
Subtotal Full Approval - Housing, Planning and Economic Development		32,435	7,845	40,280

Revised Capital Cash Limits by Portfolio

Capital Scheme	Cap Prog Number	Revised Budget After February Cabinet	Approvals To Outturn	Final Budget at Outturn
		£'000	£'000	£'000
Community Services				
Alice Park - Skate Park	Cap1415035	123	0	123
Bath Leisure Centre Refurbishment	Cap1516006	420	0	420
Bathscape	Cap1819011	40	0	40
Beechen Cliff Woodland & Other Open Spaces Improvements	Cap1415017	22	0	22
Haycombe Crematorium	Cap1819029	78	0	78
Heritage Infrastructure Development	Cap1415052	55	0	55
Heritage Services Energy Capture Scheme	Cap1819030	5	0	5
Leisure - Council Client / Contingency	Cap1516049	156	0	156
Leisure Bath - Car Park	Cap1718043	2	0	2
Leisure Facility Modernisation - Keynsham Sports Centre	Cap1516051	394	0	394
Modern Libraries & Workplaces	Cap1718058	28	0	28
Parade Gardens Café Acquisition	Cap1819085	0	0	0
Parade Gardens Infrastructure for Business Development	Cap1617015	-2	0	-2
Parks and Bereavement Infrastructure	Cap1819051	72	0	72
Parks Equipment Replacement Programme	Cap1718029	20	0	20
Parks S106 Projects	Cap1718037	288	6	294
Play Area Refurbishment / Equipment	Cap1415039	254	0	254
Public Tennis Improvements	Cap1920010	544	0	544
Roman Baths Archway Centre	Cap1617021	3,306	48	3,354
Sydney Gardens	Cap1415030	800	0	800
Visitor & Till Management System	Cap1415050	0	0	0
Subtotal Full Approval - Community Services		6,605	54	6,659
TOTAL CAPITAL SCHEME BUDGET		88,395	9,836	98,230

Sources of Funding				
Grants				58,216
Council Support Including Borrowing and Capital Receipts				35,986
S.106 contributions				409
CIL contributions				2,044
3rd Party Contributions				880
Revenue				695
TOTAL SOURCES OF FUNDING				98,230

Bath & North East Somerset Council

MEETING:	Cabinet	
MEETING DATE:	20th July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3305
TITLE:	Revenue and Capital Budget Monitoring, Cash Limits and Virements – April 2021 to June 2021	
WARD:	All	
AN OPEN PUBLIC ITEM		
<p>List of attachments to this report:</p> <p>Appendix 1 – Revenue Monitoring Commentary</p> <p>Appendix 2 – Key Scheme Capital Monitoring Commentary</p> <p>Appendix 3 (i) & 3 (ii) – Proposed Revenue Virements & Revised Revenue Cash Limits 2021/22</p> <p>Appendix 4 (i) & 4 (ii) – Capital Virements & Capital Programme by Portfolio 2021/22</p>		

EXECUTIVE SUMMARY

a) Revenue budget

The Revenue budget outturn is currently forecast to be £1.9m over budget. This includes the use of £2m Covid contingency funding to fund the on-going financial pressures resulting from the pandemic.

Significant projected income losses in Heritage Services are behind the £1.9m forecast over budget position. Many services across the Council are also suffering continued income losses, although the government's sales, fees and charges compensation scheme, which runs until the end of June, is helping mitigate some of the impact to the bottom line.

Furthermore, B&NES were allocated £4.1m of additional unringfenced Covid grant funding in the 2021/22 Local Government Finance Settlement. This together with a £0.9m transfer from unearmarked reserves agreed as part of the 2021/22 Budget report created a £5m Covid contingency reserve for 2021/22. Unringfenced Covid grant funding of £0.6m has been carried forward from 2020/21, giving a revised balance on the Covid contingency reserve of £5.6m to help mitigate the on-going and new Covid-19 expenditure pressures.

In addition, there is an in-year SEND placement pressure of £6.3m on the Dedicated Schools Grant (DSG). Mitigation plans are being worked up which includes identifying uncommitted balances within the DSG.

Savings of £8.5m were included in the 2021/22 budget. At present all savings are expected to be delivered, although these will be monitored closely through the year and management action plans identified should delivery of any become at risk.

b) Capital budget

The current position of the 2021/22 Capital Programme is a forecast of £78.5m against a budget of £83.7m. The variance of £5.2m reflects anticipated rephasing requests into future years, mainly from the large Economic Development Project for Bath Western Riverside.

c) Council Tax and Business Rates

There has been a gradual reduction in the cost of the Local Council Tax Support Scheme over the first quarter, in line with a fall in working age claimants, with the cost at the end of June £10.36m. This is currently £0.61m below the budget estimate which would lead to a Council Tax Collection Fund surplus if the position remained at this level at year end.

The government announced that it will continue to provide eligible retail, hospitality and leisure properties in England with business rates relief during 2021/22. As at the end of June, relief of £17.8m had been granted under this scheme. The loss of income will be compensated by government grant.

Empty property relief following business closures has increased from £4.2m to £4.9m in the first quarter of the year. This is £0.4m below the £5.3m allowance for empty property relief included when setting the business rate income forecast for 2021/22.

d) Council Reserves

The current outturn forecast includes the use of £2m from the Council's Covid contingency reserve to fund ongoing pressures resulting from the pandemic.

1 THE ISSUE

- 1.1 This report presents the financial monitoring information for the Authority as a whole for the financial year 2021/22, using information available as at the end of June 2021.

2 RECOMMENDATION

The Cabinet is asked:

- 2.1 To note the 2021/22 revenue budget position (as at the end of June 2021).
- 2.2 To note the revenue virements listed for information only in Appendix 3(i).
- 2.3 To note the capital year-end forecast detailed in paragraph 3.21 of this report;
- 2.4 To note the changes in the capital programme including capital schemes that have been agreed for full approval under delegation listed in Appendix 4(i).

3 THE REPORT

3.1 The Budget Management Scheme requires that the Cabinet consider the revenue and capital monitoring position four times per year.

REVENUE BUDGET

3.2 Service Directors have been asked to outline the actual expected outturn for the year and the reasons to date for over / under budget forecasts. For revenue budgets which are forecast to be over budget, the Directors are expected to seek compensating savings to try and bring budgets back to balance.

3.3 A summary by Portfolio of the revenue position as at the end of the first quarter is shown in the table below:

Portfolio	Revised Budget £'m	Year End Forecast £'m	Variance Over / (Under) £'m
Economic Development and Resources	10.58	14.01	3.43
Climate and Sustainable Travel	1.23	1.30	0.07
Adults and Council House Building	63.51	63.38	(0.13)
Children & Young People, Communities & Culture	31.78	32.01	0.23
Neighbourhood Services	24.14	24.49	0.35
Transport Services	(3.22)	(3.92)	(0.70)
Planning	2.07	2.71	0.64
Forecast Outturn Variance	130.08	133.98	3.90
Use of Covid Contingency Reserve			(2.00)
Quarter 1 Forecast Outturn Position			1.90

Note1: Some of the figures in this table are affected by rounding.

3.4 The current **year-end** forecast is £1.90m over budget position. The forecast includes the projected use of £2m from the Covid Contingency Reserve to mitigate in year pressures.

Portfolio Commentary

3.5 Key variances and associated actions by Portfolio are as follows, a more detailed breakdown can be found in Appendix 1:

Economic Development and Resources (£3.43m over budget)

The on-going pandemic and capacity restrictions are still limiting revenue generation in Heritage Services. When the 21/22 budget was prepared a January to May lockdown was not anticipated and with the Roman Baths, Fashion Museum and Victoria Art Gallery closed for Easter and the first May Bank Holiday, the adverse outturn position is currently forecast at £1.90m. Income from the Thermae Bath profit share is also forecast to be impacted by £0.30m, while the IT service continues to be under pressure from remote working arrangements and is reporting a £0.20m pressure. The Preparing for the Future programme continues to develop new approach to ways of working and how we use our Corporate Estate, but currently there is a £0.67m pressure from unachieved income targets and unbudgeted costs associated with the Bath Community Academy site at Culverhay.

Climate and Sustainable Travel (£0.07m over budget)

A £0.1m staffing pressure in the Transport Planning, Policy and Sustainable Transport relating to the increased volumes of work relating to the Joint Local Transport Plan is offset by a minor underspend on staffing in the Environmental Monitoring service.

Adults and Council House Building (£0.13m under budget)

The current forecast position for Adult Social Care is a balanced position. This reflects the reduced number of package placements seen during 2020/21 which has continued into 2021/22 and allows for the impact of the expected demand in the second half of this year when current health funding arrangements for Hospital discharges end. Future demand on Adult Social Care is expected to return to previously seen levels once we are through this pandemic period, with a risk of additional demand being seen when these levels return, in both package numbers and complexity of social care cases.

The level of future demand is still undetermined but is expected to cause pressure on existing budgets. To balance this, work is continuing on the delivery of the service plans so this demand can be met.

Housing are forecasting a £0.13m favourable budget position and is a result of staffing underspends.

Children and Young People, Communities and Culture (£0.23m over budget)

The Children and Young People segment of this Portfolio is over budget by £0.07m, this includes £0.39m of Covid related expenditure.

This position includes a £0.09m over budget position in the Education Psychology service. This is due to temporary staffing costs that should reduce for 22/23.

Other pressures spread across the Children's Education service area total £0.12m. This is offset by savings of £0.07m in the Children's Commissioned Service, which is due to ongoing (but temporary) alternative funding sources for 21/22, and £0.06m savings in the Children and Young People cashlimit. This saving is due to the successful procurement of an alternative more suitable lower cost package, for an ongoing exceptionally expensive complex placement.

Reduced income for Events due to social restrictions, partly mitigated by the government's sales, fees and charges scheme, are forecast to add a further £0.07m pressure to the portfolio, while savings in Customer Services are currently forecast at risk but plans to mitigate are in development.

Schools DSG (£6.27m over budget, plus an overspend of £5.42m carried forward from 2020-21)

The DSG has a forecast overspend of £6.27m in 20/21 made up of significant pressures on SEND. The SEND pressures are estimated based on current pupils identified with Education, Health and Care (EHC) Plans of £6.8m however mitigating actions have identified £0.5m of savings.

Further work on opening the provision of local SEND places at schools in the area will help reduce the pressure and extensive analysis of the specific cost pressures is being conducted to look to reduce the overspend.

Any overspend on the DSG is currently ringfenced to the grant allocation and the Department for Education (DFE) have issued guidance to restrict the supporting of the pressures from council revenue funding. Further guidance is expected to be released regarding this by the DFE and DCLG shortly.

A recovery plan is being developed to be shared with the DFE and the Schools Forum, so that the overspend can be recovered over an extended period of several years.

Neighbourhood Services (£0.35m over budget)

Further financial support to our leisure operator is causing a £0.20m pressure in the Leisure service, whilst increased staffing, vehicle and tonnage costs, combined with reduced income from trade waste continue to cause the Waste service an on-going budget pressure of £0.19m.

Transport Services (£0.70m under budget)

Parking was allocated £3.5m growth in the 21/22 budget to mitigate the continued expected income losses resulting from the on-going pandemic. When considering sales, fees and charges compensation grant, parking income in April and May has been higher than expected when setting the 21/22 budget. Consequently, forecasts for the remainder of the year are also more optimistic, resulting in a favourable forecast of £0.70m. The forecast is only based on two months of data and therefore demand will be monitored closely, and further information will be provided in the quarter 2 monitoring report.

Planning (£0.64m over budget)

Planning income continues to be significantly impacted by the pandemic, with larger income generating applications remaining low compared to 2019/20 levels. After sales, fees and charges compensation grant and salaries underspends the service is forecasting a £0.37m pressure. Net licensing income is also £0.24m down against budget, whilst the absence of a casino operator is also causing a budget pressure for the portfolio.

REVENUE BALANCES, CONTINGENCY AND RESERVES

3.6 The current forecast revenue position includes planned and approved use of earmarked reserves as set out in the table below.

Key Reserves

3.7 The following table shows the balances of key reserves at the beginning of the year, planned use, and expected balance at the year-end based on current forecast:

	Balance as at 01/04/2021 £'m	2020/21 O/T Report Proposed Transfers £'m	Projected Use / Commitments £'m	Estimated Balance 31/03/2021 £'m
Revenue Budget Contingency	2.94	0.10	(0.54)	2.50
Financial Planning and Smoothing Reserve	3.06	4.61	(0.67)	7.00
Transformation Investment Reserve	1.93	0.70	(0.63)	2.00
Covid Contingency Reserve (Govt grant)	5.62	0.00	5.62	0.00
Restructuring & Severance Reserve	2.18	0.00	0.00	2.18

Reserves and Flexible Capital Receipts

3.8 Flexible Capital Receipts are being utilised for revenue spend that results in ongoing revenue savings. A five-year estimated use of £11.5m was agreed as part of budget setting in February 2021, this has now been updated to reflect the re-profiled requirement and re-phasing into 2021/22 as follows:

	Actual Usage 2017/18 £'m	Actual Usage 2018/19 £'m	Actual Usage 2019/20 £'m	Actual Usage 2020/21 £'m	Est Usage 2021/22 £'m	Est Total Usage £'m
Flexible Capital Receipts	3.12	3.45	1.26	0.10	3.57	11.50

3.9 Unapplied capital receipts of £2.871m was carried forward from 2020/21 and £0.308m has been received in 2021/22 so far with a further £5.1m budgeted for receipt in 2021/22.

General Fund Un-Earmarked Reserve

3.10 The General Fund Un-Earmarked Reserve is retained to meet the Council's key financial risks. The risk assessment has set a range of between £11.6m and £12.8m to meet those risks in the 2021/22 financial year. The reserve has a current uncommitted balance of £12.6m in line with the level reported in the 2021/22 Budget Report.

3.11 There is a further commitment of £3m in 2022/23 to support the revenue budget, this will leave a 2022/23 reserve balance of £9.6m that is within Council benchmark levels for unearmarked reserves as a percentage of net budget. (benchmarked against South West Unitary Authorities).

SAVINGS PERFORMANCE

- 3.12 The 2021/22 revenue budget approved savings of £8.5m. It is too early to assess the delivery of all agreed proposals. However, these will be monitored over the coming weeks and will be reported in more detail in the quarter 2 monitoring report.
- 3.13 The Council's financial position, along with its financial management arrangements and controls, are fundamental in continuing to plan and provide services in a managed way, particularly in light of the medium-term financial challenge. Close monitoring of the financial situation provides information on new risks and pressures in service areas, and appropriate management actions are then identified and agreed to manage and mitigate those risks.

Revenue Budget Virements

- 3.14 Any revenue budget virements which require Cabinet approval are listed in Appendix 3(i). Technical budget adjustments are also shown in Appendix 3(i) for information purposes, as required by the Budget Management Scheme. Appendix 3(ii) details the reallocation of cashlimits to the new Cabinet Portfolio structure as agreed at the Council Meeting on 4th May 2021.

COUNCIL TAX, COUNCIL TAX SUPPORT AND BUSINESS RATES

- 3.15 The Council saw a large increase in the number of people claiming Local Council Tax Support (LCTS) as result of the economic impact of the pandemic during 2020/21. The 2021/22 tax base allowed for an increase of 5% on the number of working age recipients as at the end of November 2020 with budgeted costs of LCTS set at £10.97m. The cost at the beginning of April was £10.69m and there has been a gradual reduction over the first quarter, in line with a fall in working age claimants, with the cost at the end of June £10.36m. This is currently £0.61m below the budget estimate which would lead to a Council Tax Collection Fund surplus if the position remained at this level at year end. The number of working age claimants at the end of June was 6,489 compared to the budget assumption of 6,915. The reduction is due to claimants ceasing to be entitled to LCTS, for example where they have returned to employment.
- 3.16 The actual outturn position on LCTSS and the impact on the Council Tax collection fund will depend on a number of variables, including the change in number of claimants and the period claimants remain eligible for support whilst seeking employment and this will continue to be monitored closely during the year. Further increases in claimants may feed through as the government furlough support scheme is reduced during July to September, with the scheme due to end on the 30th September 2021.

Business Rates

- 3.17 The government announced, as part of the Chancellor's Budget Statement in early March 2021, that it will continue to provide eligible retail, hospitality and leisure properties in England with 100% business rates relief from 1 April 2021 to 30 June 2021. This will be followed by 66% business rates relief for the period from 1 July 2021 to 31 March 2022, capped at £2 million per business for

properties that were required to be closed on 5 January 2021, or £105,000 per business for other eligible properties.

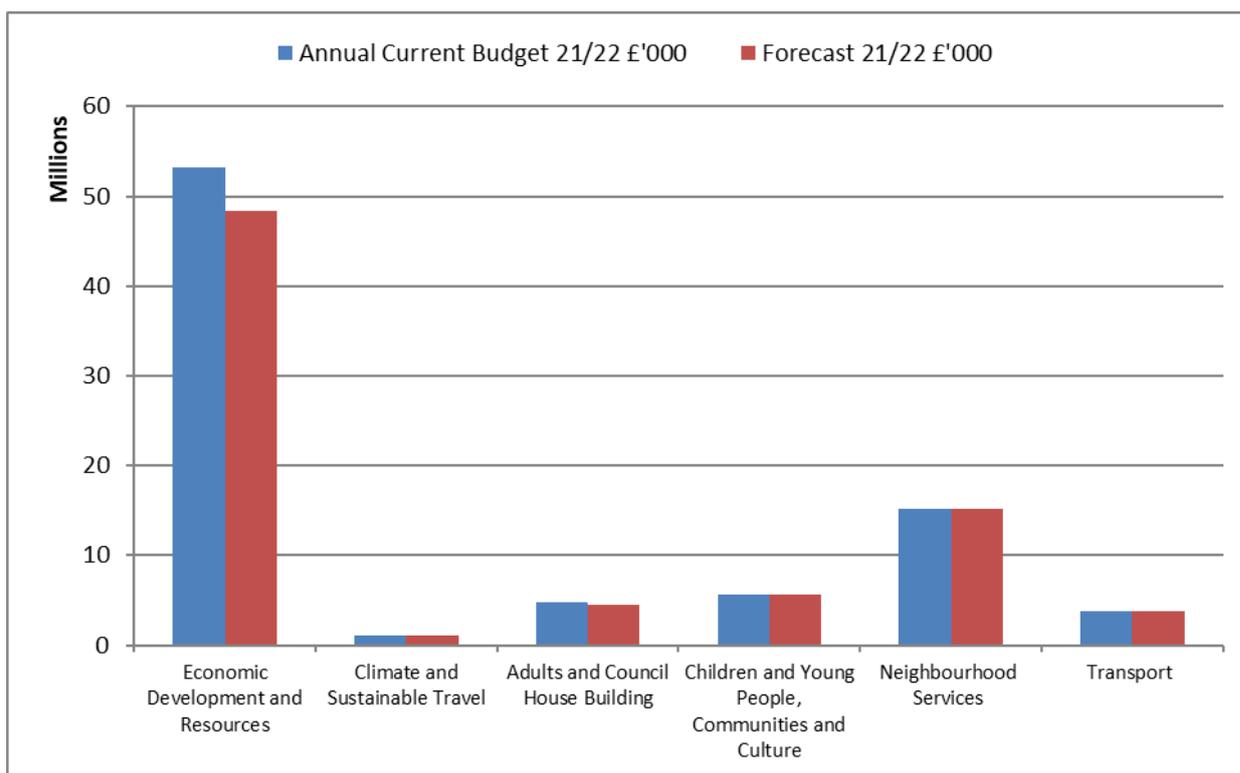
- 3.18 The Council will be recompensed for the reduction in business rate income arising from this relief via a s31 compensation grant. The announcement was made after the 2021/22 budget for business rate income was set, so the award of the relief will create a collection fund deficit which will be offset by the s31 compensation grant income received into the Council's revenue account. As at the end of June retail relief of £17.8m had been granted.
- 3.19 Empty property relief following business closures has increased from £4.2m to £4.9m in the first quarter of the year, but currently remains below the £5.3m allowance included when setting the business rate income forecast for 2021/22. The forecast overall impact on the business rates collection fund position will be reviewed during the second quarter and the position in relation to reliefs will be closely monitored.
- 3.20 As set out in the Budget Report, any surplus or deficit on the Business Rate Collection Fund and associated income will be transferred to or from the Business Rates Reserve for consideration as part of the Business Rates calculations for future years and this position will be reflected in the 2022/23 budget. The balance on the Business Rate Reserve as at 1st April 2021 was £3.684m, this includes the £2.8m transfer from the reserve approved in the 2021/22 budget report.

CAPITAL BUDGET

- 3.21 The current position of the 2021/22 Capital Programme is a forecast of £78.5m against a budget of £83.7m. The variance of £5.2m mainly reflects the large Economic Development Project for Bath Western Riverside. The following table show a summary of the current position by Cabinet Portfolio. The full breakdown of the Capital Programme by Portfolio can be found in Appendix 4(ii) with key scheme commentary in Appendix 2. Appendix 4(ii) sets out budget changes actioned since the February Budget setting and also illustrates the rephasing from 2020/21 reported for approval in the Revenue & Capital Outturn 2020/21 report, which is also on this meeting's agenda.

Portfolio Summary Monitor	Annual Current Budget 2021/22 £'000	Forecast 2021/22 £'000	In-Year Variance 2021/22 £'000	Forecast Re-phasing to 2022/23 £'000	Other Variance 2021/22 £'000
Economic Development and Resources	53,264	48,335	4,929	4,929	0
Climate and Sustainable Travel	1,017	1,017	0	0	0
Adults and Council House Building	4,784	4,484	300	300	0
Children and Young People, Communities and Culture	5,679	5,679	0	0	0
Neighbourhood Services	15,216	15,216	0	0	0
Transport	3,760	3,760	0		0
Grand Total	83,720	78,491	5,229	5,229	0

The graph below illustrates the value and forecast against budget for all in year capital budgets by Cabinet Portfolio:



Capital Commentary

3.22 The key in year variances on the programme by portfolio include:

- **Economic Development and Resources-** £4.9m for Bath Western Riverside scheme where phasing needs to be aligned with Homes England Grant.
- **Adults and Council House Building** – Pemberley Place affordable housing scheme delayed due to the pandemic, grant funding of £300k now expected to be re-phased into 22/23.

RISKS

The key risks to the budget were outlined in the Councils 2021/22 Budget Report, in compliance with the Council's decision-making risk management guidance. These have been reviewed with the additional risks added below, including risks that specifically relate to the Covid-19 pandemic:

Risk	Likelihood	Impact	Risk Management Update
Continued government restrictions in the event of new variants impacting vaccine success	Possible	High	This is certainly a material risk, whilst not one the Council has direct control over, every step is being put in place to follow government guidance following the recommendations of our Director of Public Health.
Operational budget pressures due to latent demand and backlog	Possible	High	There is the risk of built up demand on Council services and backlog because of operational activity being diverted to managing the Covid pandemic. This may result in one-off cost pressures to clear the

			backlog.
Long term impacts on the Councils Commercial Estate over and above anticipated levels.	Possible	High	Current modelling has been prudent anticipating a material impact in 2021/22. The roll back of the furlough programme could impact business viability and therefore risk of further voids will be monitored closely over the coming weeks and months.
The income from Heritage Services may not recover in the short term.	Possible	High	Continue to monitor income levels and impact on business plan in light of capacity restrictions. We anticipated income will not fully recover in the medium term and growth was built into the medium terms financial plan for the next three years.
Impact on Reserves	Possible	High	Without additional government grant in recognition of Covid related financial pressures there is the risk that Council reserve levels are not enough to manage in-year and future years risk.
Interest rates increase	Possible	Medium	A reserve is available for borrowing to manage market risk and long-term borrowing costs have been factored into the longer-term MTFS. The current forecast from our treasury management advisors is that borrowing rates will remain at current low levels in the medium term until economic growth prospects improve. The Council will continue to consider shorter term borrowing options alongside the PWLB.
Volatility and uncertainty around business rates	Likely	High	The impacts of Covid-19 will increase the volatility and uncertainty around business rate income. In 2021/22 this risk will be partly offset by the extension of the business rate relief scheme for Retail, Leisure and Hospitality businesses. We continue to monitor arrears, CVAs, and liquidations with a specific reserve held to manage in-year volatility.
Capital projects not delivered resulting in revenue reversion costs or liabilities from underwriting agreements	Possible	High	The Council has a number of projects within this category. These risks will continue to be monitored and reported. An assessment is made as part of the budget process to ensure that revenue reserves are sufficient to meet these risks. The capital programme methodology looks to de-risk projects wherever possible.
Changes to Government Policy that affects future funding	Likely	High	Need to monitor and continue to highlight impact
Brexit risks	Likely	Medium	The short to medium term impacts of Brexit on the Councils supply chain may result in contractual cost pressures from customs tariffs that previously did not apply.
Funding pressures through WECA, CCG and other partners	Possible	Medium	Ensure good communication links with partner organisations.
Capital receipts in the areas identified are insufficient to meet target	Possible	Medium	There is a risk that a depressed market will impact on current values, in the short to medium term the Council should not rely on capital receipts as a key funding source.

4 STATUTORY CONSIDERATIONS

4.1 The annual medium-term financial planning process allocates resources across services with alignment of these resources towards the Council's corporate priorities. This report monitors how the Council is performing against the financial targets set in February 2021 through the Budget setting process.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 The financial implications are contained within the body of the report.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

6.2 The substance of this report is part of the Council's risk management process. The key risks in the Council's budget are assessed annually by each Strategic Director, with these risks re-assessed on a monthly basis as part of the budget monitoring process.

7 CLIMATE CHANGE

7.1 The Medium Term Financial Strategy and budget process aligns resources towards the corporate priorities and objectives set out in the Corporate Strategy, which includes tackling the climate emergency. This report monitors the Council's financial performance against those budgets, and therefore does not include any decisions that have a direct impact on Climate Change.

8 OTHER OPTIONS CONSIDERED

8.1 None

9 CONSULTATION

9.1 Consultation has been carried out with the Cabinet Member for Economic Development & Resources, Strategic Directors, Section 151 Finance Officer, Chief Executive and Monitoring Officer.

9.2 Consultation was carried out at meetings and via e-mail.

Contact person	<p><i>Gary Adams – Head of Corporate Finance</i> 01225 477107 Gary_Adams@bathnes.gov.uk</p> <p><i>Paul Webb – Finance Manager, Budget Reporting</i> 01225 477298 Paul_Webb@bathnes.gov.uk</p>
Background papers	N/A
Please contact the report author if you need to access this report in an alternative format	

Appendix 1 - Revenue Monitoring Commentary Quarter 1 2021/22

Portfolio Number and Description	Cashlimit Number and Description	Current Budget £000	Actuals to date £000	Quarter 1 Published Forecast £000	Quarter 1 Published Outturn Variance £000	Change from Previous Quarter Forecast Over / (Under) £000	2021/22 Quarter 1 Outturn Variance Over / (Under) £000	Outturn Variance Analysis	Outturn Recovery Plan		
Detailed Analysis of Budgets for Economic Development and Resources											
P26	Economic Development and Resources	1018	Heritage Services	(5,447)	1,325	(3,548)	0	0	1,899	When the 21/22 budget was prepared the Jan-May lockdown was not anticipated. This meant the Roman Baths, Fashion Museum and Victoria Art Gallery were closed for Easter and the first May bank-holiday. The ongoing capacity restrictions are limiting revenue generation and current government support through the Sales, Fees & Charges grant is due to end at quarter 1, whilst capacity restrictions will continue beyond this date.	Some cost mitigations identified and Sales, Fees & Charges grant support covers much of the Quarter 1 loss however the losses through July and August are not containable in-Service.
P26	Economic Development and Resources	1032	Information Technology	5,314	2,336	5,515	0	0	201	Ongoing impacts from Covid and IT suppliers have resulted in financial & operational pressures, along with the new technology changes which continue to put pressure on all aspects of the service and its costs	A new Digital, Data & Technology Strategy is being finalised and part of this process is to re-prioritise activity, assess new operating models and areas for investment and attention over the remainder of 21/22
P26	Economic Development and Resources	1037	Property Services	559	259	561	0	0	2	Minor variance across service.	Not applicable
P26	Economic Development and Resources	1038	Corporate Estate Including R&M	3,447	2,293	4,117	0	0	670	The main pressure for this area is the unachieved income (£454k) from our accommodation target although the Preparing for the Future programme should partly offset this at some point in the year. The other major area of overspend is for the costs of our Bath Community Academy (BCA) site at Culverhay (£122k) which are unbudgeted. Other adverse variances relating to staff and recharge income make up the difference.	A service review is ongoing to identify areas of possible opportunities to make efficiencies on expenditure once staffing structures are embedded.
P26	Economic Development and Resources	1039	Traded Services	0	1	0	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1040	Finance	2,716	391	2,716	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1041	Revenues & Benefits	1,326	1,027	1,306	0	0	(20)	Staff Vacancy Savings in Q1	Not applicable
P26	Economic Development and Resources	1042	Risk & Assurance Services	1,196	339	1,196	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1047	Human Resources & Organisational Development	1,711	1,714	1,718	0	0	7	No material variance reported	Not applicable
P26	Economic Development and Resources	1052	Regeneration	254	1,022	196	0	0	(58)	Staff savings resulting from vacancies yet to be filled.	Not applicable
P26	Economic Development and Resources	1053	Council Solicitor & Democratic Services	2,553	916	2,654	0	0	101	Proposed savings to reduce external legal spend are not fully achievable. Options for alternative savings are currently being explored.	Alternative savings are currently being explored.
P26	Economic Development and Resources	1054	Hsg / Council Tax Benefits Subsidy	(195)	3,251	(195)	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1055	Capital Financing / Interest	6,830	1,987	6,830	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1056	Unfunded Pensions	1,588	246	1,513	0	0	(75)	Small underspend forecast based on current spend to date.	Not applicable
P26	Economic Development and Resources	1057	Corporate Budgets including Capital, Audit and Bank Charges	(8,776)	(19,977)	(8,401)	0	0	375	The forecast overspend includes a £300k shortfall of income forecast from Bath Spa Profit Share due to the COVID-19 restrictions impacting turnover, a £40k pressure due to additional external audit fees and a £35k overspend forecast on the Apprenticeship Levy payments, mainly due to the increase Council payroll following the TUPE of staff.	As the income comes from a third party arrangement, the Council is limited in its recovery options. Possible reserves request to support Covid pressures.
P26	Economic Development and Resources	1058	Magistrates	12	2	12	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1059	Coroners	335	196	335	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1060	Environment Agency	251	62	251	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1061	West of England Combined Authority Levy	5,148	1,785	5,148	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1081	Commercial Estate	(10,172)	(3,623)	(10,172)	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources	1109	World Heritage	158	34	154	0	0	(3)	Minor variance across service.	Not applicable

Appendix 1 - Revenue Monitoring Commentary Quarter 1 2021/22

Portfolio Number and Description	Cashlimit Number and Description	Current Budget £000	Actuals to date £000	Quarter 1 Published Forecast £000	Quarter 1 Published Outturn Variance £000	Change from Previous Quarter Forecast Over / (Under) £000	2021/22 Quarter 1 Outturn Variance Over / (Under) £000	Outturn Variance Analysis	Outturn Recovery Plan
P26	Economic Development and Resources 1112 Housing Delivery Vehicle	(1,000)	460	(882)	0	0	118	Lower than budgeted interest income based on current forecast of loans to the Councils Housing Company.	Review income budget in line with 2021/22 business plan and sales pipeline.
P26	Economic Development and Resources 1118 Procurement & Commissioning	240	38	259	0	0	19	Minor overspends across service	Not applicable
P26	Economic Development and Resources 1126 Visit Bath	76	49	76	0	0	0	No variance reported.	Not applicable
P26	Economic Development and Resources 1130 Corporate Governance	1,459	237	1,695	0	0	235	The delivery of the senior management savings of £300k are on track following the completion of the Director level restructure. There is a residual pressure in the cashlimit from unachieved legacy strategy and performance savings, the deliverability of this target will be fully reviewed in the next quarter.	Finalise staffing structures across the organisation to understand short and long term resourcing requirement
P26	Economic Development and Resources 1131 Corporate Strategy and Communications	997	155	952	0	0	(45)	Staff Vacancy Savings	Not applicable
P26	Economic Development and Resources 1132 Business Change	1	135	0	0	0	(1)	No variance reported.	Not applicable
P26	Economic Development and Resources Total	10,580	(3,339)	14,005	0	0	3,426		

Detailed Analysis of Budgets for Climate and Sustainable Travel

P27	Climate and Sustainable Travel 1120 Sustainability	647	64	648	0	0	1	Minor overspends across service	Not applicable
P27	Climate and Sustainable Travel 1127 Environmental Monitoring (Air Pollution)	211	43	179	0	0	(32)	Staffing savings.	Not applicable
P27	Climate and Sustainable Travel 1129 Clean Air Zone	0	(2,432)	0	0	0	0	CAZ expenditure is covered in full by the income generated, early indications show that income is around the budgeted level. But its too early to see trends developing. Any shortfall would be covered by the New Burdens Principal.	Not applicable
P27	Climate and Sustainable Travel 1135 Transport Planning, Policy and Sustainable Transport	371	367	470	0	0	98	Staffing pressures within the service, from increased volumes of work relating to the Joint Local Transport Plan	Currently looking at savings across the service to mitigate pressure
P27	Climate and Sustainable Travel Total	1,229	(1,959)	1,296	0	0	67		

Appendix 1 - Revenue Monitoring Commentary Quarter 1 2021/22

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	Quarter 1 Published Forecast £000	Quarter 1 Published Outturn Variance £000	Change from Previous Quarter Forecast Over / (Under) £000	2021/22 Quarter 1 Outturn Variance Over / (Under) £000	Outturn Variance Analysis	Outturn Recovery Plan
Detailed Analysis of Budgets for Adults and Council House Building											
P28	Adults and Council House Building	1029	Housing	1,406	(376)	1,281	0	0	(125)	The Homelessness Prevention programme is still under development and is forecast to be delivered within available funding. Furthermore, underspends on staffing result in a favourable forecast position.	Not applicable
P28	Adults and Council House Building	1073	Adults & Older People-Mental Health Commissioning	9,958	2,178	9,958	0	0	0	The impact of packages joint funded with health has reduced Social Care spend and purchasing expenditure is further reduced by lower placement activity during the COVID pandemic still being seen. At this stage however the Mental Health budget is balanced as the funding impacts of Transforming Care Agenda on Social Care budgets are increasing for expensive and complex packages requested via the panel process.	New placements are being monitored closely when transferring from Covid Funding and service users with capital drops. Pressure continues in high cost placements but this continues to be reviewed by commissioners through panel processes, contract monitoring, and continued work on savings plans. There has been an increase in joint Health Fund funding for Section 117 service users which have been reviewed in the panel process and D2A funding remains at 6 weeks.
P28	Adults and Council House Building	1086	Adult Care Commissioning	1,507	239	1,496	0	0	(11)	Staff turnover has created a small one off savings	Review of commissioning staff structure bring completed.
P28	Adults and Council House Building	1088	Older People & Physically Disabled Purchasing	13,245	853	13,219	0	0	(26)	Health funding is still being provided for first 6 weeks of support to hospital discharge cases and this has generated a one off savings. Health support will be tapered down in Q2.	Commissioner and social workers are working together to reduce reliance on residential based care and deliver savings plans.
P28	Adults and Council House Building	1091	Learning Disabilities Commissioning	18,108	1,494	18,355	0	0	247	There are high cost adults transitioning from Children's services with higher provider costs than anticipated. These complex cases are being closely monitored and have been put forward for CHC assessment by commissioning managers. Most day care and respite providers have resumed services, some being delivered differently.	There is continued pressure in high cost placements particularly transition service users. Commissioners continue to review through the panel process, contract monitoring and working closely with Children's Services around Transitions. Work continues on savings plans to bring the spend in balance by the end of the year.
P28	Adults and Council House Building	1093	Physical Disability, Hearing & Vision	4,499	433	4,280	0	0	(219)	Activity in this service area's Purchased Care is reducing. Once the impact of the cessation of D2A funding budget re-alignment may be required.	Commissioners continue to review this budget area through the panel process, contract re-negotiation, contract monitoring, and continued work on savings plans. Budget underspend will offset overspends in other areas of Adult Social Care.
P28	Adults and Council House Building	1110	Better Care Fund	7,630	(2,722)	7,630	0	0	(0)	No variance reported.	Not applicable
P28	Adults and Council House Building	1113	CCG B&NES CHC and FNC Payments	0	914	0	0	0	0	No variance reported.	Not applicable
P28	Adults and Council House Building	1114	Community Equipment	203	574	203	0	0	0	Demand is being contained within budget. One off demand to support Paulton hospital adaptations was met from specific grant funding.	Contract for management of service being reviewed.
P28	Adults and Council House Building	1123	Safeguarding Adults	1,941	508	1,938	0	0	(2)	Staff turnover has created a small one off savings	Not applicable
P28	Adults and Council House Building	1124	Community Resource Centres & Extra Care Income	5,009	1,244	5,020	0	0	11	Additional staffing costs needed to manage covid sickness/isolation.	Commissioner and CRC Managers are working together to increase occupancy levels to increase fee income.
P28	Adults and Council House Building Total			63,507	5,340	63,381	0	0	(125)		
Detailed Analysis of Budgets for Children & Young People, Communities & Culture											
P29	Children & Young People, Communities & Culture	1036	Adults Substance Misuse (DAT)	157	227	157	0	0	(0)	Majority of spend is on fixed price contract arrangements. Insufficient data has been received on demand for medicines and drugs to forecast a variance to budget.	Not applicable
P29	Children & Young People, Communities & Culture	1076	Children, Young People & Families	18,046	9,030	17,982	0	0	(64)	This forecast includes £392k Covid costs. The small under budget position is the net result of the reduction of 2 Residential placements versus budget assumptions, reduced cost versus budget assumptions in Joint Agency Panel for an exceptionally expensive placement (due to the successful procurement of a more suitable lower cost placement) offsetting increased costs from 6 additional JAP placements versus budget assumptions.	Not applicable
P29	Children & Young People, Communities & Culture	1077	Inclusion & Prevention	3,109	(1,684)	3,202	0	0	93	Over budget due to Educational Psychology. This is a due to staffing pressures that were in existence during 20/21, but were met with one-off funding in 20/21. This pressure should reduce for 22/23.	The service is actively searching for ways to mitigate this cost in-year.

Appendix 1 - Revenue Monitoring Commentary Quarter 1 2021/22

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	Quarter 1 Published Forecast £000	Quarter 1 Published Outturn Variance £000	Change from Previous Quarter Forecast Over / (Under) £000	2021/22 Quarter 1 Outturn Variance Over / (Under) £000	Outturn Variance Analysis	Outturn Recovery Plan
P29	Children & Young People, Communities & Culture	1078	Education Transformation	6,680	(2,310)	6,802	0	0	122	The pressure forecast is a result of two historical pressures, both reoccurring in 21/22 but not able to be offset by one-off Financial Recovery Savings as was achieved in 20/21. There is a £72k pressure from the unwinding of the Childcare Voucher scheme, as this service is now in decline due to the new Government Childcare Scheme offering. The remaining pressure relates to ongoing costs of previous capital investment.	The service is actively searching for ways to mitigate this cost in-year.
P29	Children & Young People, Communities & Culture	1079	Schools Budgets	(1,877)	1,512	(1,877)	0	0	0	Although shown on budget, any overspend in the DSG is held on the balance sheet. The carried forward balance into 21/22 is a £5.2m deficit, with significant increase to this deficit forecast to occur during 21/22. These pressures are in relation to SEND costs.	Recovery plan to reduce this deficit over the coming years is being drafted.
P29	Children & Young People, Communities & Culture	1089	Community Safety	193	207	193	0	0	0	No variance reported.	Not applicable
P29	Children & Young People, Communities & Culture	1094	Public Health	0	6,063	0	0	0	0	Public Health is fully funded by a ring fenced DHSC grant	Review of Leisure services and restructuring of contracts to maximise Public Health benefits.
P29	Children & Young People, Communities & Culture	1116	Integrated Commissioning - CYP	2,626	1,989	2,550	0	0	(76)	The under budget position is as a result of the continuation into a second year of an alternative funding source achieved during 20/21, as a Financial Recovery Saving.	Not applicable
P29	Children & Young People, Communities & Culture	1117	Safeguarding - CYP	77	(74)	77	0	0	0	No variance reported.	Not applicable
P29	Children & Young People, Communities & Culture	1121	Events & Active Lifestyles	181	(73)	258	0	0	77	Loss of income for Events 21/22, partially reduced following a reimbursement from the government's Sales, Fees and Charges Scheme. Staffing pressures for Recovery Plan work and within the events team.	Support from Sales, Fees & Charges grant in Quarter 1, however the service are expecting income losses in Quarter 2. Possible reserves request to support covid expenditure pressures.
P29	Children & Young People, Communities & Culture	1122	Customer Services (Including Libraries)	2,136	334	2,263	0	0	126	Proposed savings from the service are not achievable but options for alternative savings are currently being explored.	Savings plans are currently being developed
P29	Children & Young People, Communities & Culture	1128	Business & Skills	449	191	406	0	0	(43)	Economic, Enterprise and Business departmental staff savings from vacancies.	Not applicable
P29	Children & Young People, Communities & Culture Total			31,779	15,413	32,013	0	0	234		
Detailed Analysis of Budgets for Neighbourhood Services											
P05	Neighbourhood Services	1019	Leisure	517	149	717	0	0	200	Further financial Support has been provided to leisure operator GLL for this Financial year due to impacts of Covid-19 on the sector.	Possible reserves request to support covid expenditure pressures.
P05	Neighbourhood Services	1101	Neighbourhoods & Environment - Waste & Fleet Services	16,359	39,080	16,544	0	0	185	Small income pressure from reduced external income, partially supported in Q1 by the sales fees and charges scheme. Increases in staff costs, vehicle hire and electricity due to the collection and processing of increased waste tonnages.	Possible reserves request to support covid expenditure pressures.
P05	Neighbourhood Services	1102	Neighbourhoods & Environment - Parks & Bereavement Services	1,061	208	1,058	0	0	(3)	Parks and Bereavement Services both on target. Budget issue following restructure, budget to follow in Q2.	Budget to move in Q2 to bring cash limit on budget
P05	Neighbourhood Services	1115	Registrars Service	(66)	(265)	(68)	0	0	(2)	No material variances reported	Not applicable
P05	Neighbourhood Services	1134	Highway Maintenance	6,268	529	6,243	0	0	(25)	Staff Vacancy Savings in Q1 and Q2, Recruitment to take place shortly	Not applicable
P05	Neighbourhood Services Total			24,139	39,702	24,494	0	0	355		
Detailed Analysis of Budgets for Transport Services											
P25	Transport Services	1103	Transport & Parking Services - Parking	(4,463)	(1,034)	(5,206)	0	0	(743)	Budget was rebased as part of budget setting to allow for the loss of income this year. Income better than predicted in April and May, £593k recovered from Sales Fees and Charges Scheme. Limited data only based on 2 months income	Not applicable
P25	Transport Services	1104	Public & Passenger Transport	(36)	901	30	0	0	66	Pressure due to staff and vehicles supporting the councils covid response delivering PPE across the BANES area.	Possible reserves request to support covid expenditure pressures.
P25	Transport Services	1119	Emergency Planning	423	247	478	0	0	54	Increases in staff costs for additional cover due to long term sickness across the CCTV service.	Unable to mitigate the additional costs within the service
P25	Transport Services	1133	Network & Traffic Management	854	270	781	0	0	(73)	Staff Vacancy Savings in Q1 and Q2, Recruitment to take place shortly	Not applicable
P25	Transport Services Total			(3,221)	384	(3,917)	0	0	(696)		

Portfolio Number and Description		Cashlimit Number and Description		Current Budget £000	Actuals to date £000	Quarter 1 Published Forecast £000	Quarter 1 Published Outturn Variance £000	Change from Previous Quarter Forecast Over / (Under) £000	2021/22 Quarter 1 Outturn Variance Over / (Under) £000	Outturn Variance Analysis	Outturn Recovery Plan
Detailed Analysis of Budgets for Planning											
P30	Planning	1005	Building Control & Public Protection	754	13	1,019	0	0	264	We have forecast reduced Licensing income of approx. £90k across Q1&2 due to the effects of COVID along with a reduction in income on Street Trading Licenses of approx. £147k. Casino income (Schedule 9) of £121k is unachievable due to there being no casino operator. This is all partially offset by salary savings, mainly due to staff secondment and the Sales, Fees & Charges Grant Income.	Licensing income deficit may be offset by increased income in specific areas particularly if new businesses start being created after lockdown but that is difficult to forecast with any certainty at present.
P30	Planning	1106	Development Management	1,315	113	1,687	0	0	372	Reduced Planning Income due to COVID creating an expected pressure of £386k partially offset by some salary savings.	With such a volatile area, we have to wait and see if the easing of restrictions have an impact on applications. Applications are being monitored closely to provide to most accurate information for our forecast.
P30	Planning Total			2,070	127	2,705	0	0	636		
Council Total				130,081	55,668	133,978	0	0	3,897		

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CAPITAL APPENDIX 2 - KEY SCHEME VARIANCE ANALYSIS

	Narrative	2021/22 Budget £'000	2021/22 Forecast £'000	Rephasing to Future Years £'000	Under / Over Spend £'000
Adults and Council House Building					
Affordable Housing	Plans to extend the temporary accommodation at Theobald House progressing & planning permission secured and expected to complete in 2021/22. Pemberley Place extra care scheme delayed due to Covid, with grant payment of £300k is now expected to slip to 2022/23.	916	616	300	-
Housing Delivery Vehicle/ Schemes (Capital Disposals ADL)	Funding is used where required to facilitate ADL/ACL capital schemes, including the refurbishment of flats returned by Curo. ADL/ACL for are in the process of preparing business cases for Argyle Works & Station Road and we are also looking at the repurposing of some former commercial units.	600	600	-	-
Next Steps Accommodation Programme	The Next Steps Accommodation Programme was approved in January 2021 for the refurbishment of 23 Grosvenor Place is progressing and orders raised. Also the purchase of two Platform for Life Properties was approved, with one property transaction completed.	810	810	-	-
Affordable Warmth Grant Scheme	We have 2 grant offer schemes to improve energy efficiency for homes for low income households. To date we have received 137 applications and expect over 40 applications to be approved, resulting in improved energy efficiency and lower carbon emissions through better thermal installation and replacement heating systems. In addition, we are working in partnership with Curo to deliver improved underfloor thermal installation to over 70 properties.	716	716	-	-
Transport					
Office for Low Emission Vehicles (OLEV) Bid -GULW	Programme objectives are to provide 'rapid' and 'fast' charge points in public car parks and provide a last mile delivery pilot. Covid has severely impacted connection requests and supply chain issues in the recovery phase are being monitored.	964	964	-	-
Transport Improvement Programme	Programme currently progressing with a signalised pedestrian crossing at Ensleigh, Lansdown Road under construction. Budget rephasing from 2020/21 of 1,407k relates mainly to CIL and s106 funded schemes due to complexity and moving staff to work on emergency Covid measures.	2,663	2,663	-	-
Neighbourhood Services					
City Centre Security - Highways Scheme	Scheme development continues with an update on proposals as a result of the public consultation and an access study are reported elsewhere on this agenda.	385	385	-	-
Highways Maintenance Block	All workstreams progressing to programme and forecast, no exceptions to report at this stage.	5,308	5,308	-	-
Cleveland Bridge Refurbishment	Cleveland Bridge is now closed to carry out essential repairs.	3,560	3,560	-	-
Parks S106 Projects	This relates to a number of projects that are s106 funded, including the completion of a play area refurbishment at Kelston Road and new footpaths at The Tumps woodland in Bath Corston View. Other works include a play area refurbishment at Kensington Meadows, railings, handrails and entrance improvements at Hedgemoor, shrubbery landscape and improvements at Cappards Farm, Linear Park and Brickfields Road. A consultation and project plan is currently being developed at Sullis Meadows for potential delivery this year.	121	121	-	-
Waste Depot Relocation	A full planning application for the Keynsham Recycling Hub development was submitted at the end of January 2021. Next step, report to be considered by Planning Committee. Demolition of redundant buildings was completed in May. The procurement process for the construction phase is underway and formal approval for funding elsewhere on this agenda.	644	644	-	-
Sydney Gardens (Round 2)	The Sydney Gardens Project is due to complete by 31st March 2022; delays to the programme have been carefully managed and other necessary works have continued while issues were resolved. A new Petanque Terrain is complete and the Upper tennis courts have been refurbished. Heritage building conservation works are all underway, and the new Community Pavilion has been roofed and is progressing well. The next major area of work will be the new play area, which will be started in July. Additional Roman archaeology costs have been covered by the Lottery contingency budget.	2,249	2,249	-	-
Children and Young People, Communities and Culture					
Basic Needs - School Improvement / Expansion	Programme Highlights are :- - St Nicholas Primary expansion to a 420 place school. Works to provide a pedestrian footbridge were scheduled for early 2020 now delayed to 2021 due to problems with the housing developer and their agreement to a variation of the S106 Agreement for the relocation of the footbridge. £174k rephased into 21/22 due to the footbridge more likely to proceed Summer/Autumn 2021. - Peasedown St John Primary expansion to a 630 place school. A new 4 classroom block with small hall and internal remodelling to the kitchen in the existing school building is now complete. - Hayesfield School, project to expand the school refectory is now expected to complete in Spring/Summer 2021. Delays due to Academy revising the design to achieve planning permission. No impact on budget. - Cameley Primary, expansion to a 210 place school by providing a new 3 classroom block and expansion of the hall, kitchen, staff room and reception/entrance. Completion due September 2021. 1m rephased into 21/22 due to Covid delays at the development stage impacting on early programme. Scheme progressing well. - St Keyna Primary - Feasibility Study to expand to a 420 place school. To start June/July 2021.	3,206	3,206	-	-
Schools Capital Maintenance Schemes	Various schools capital maintenance schemes are moving forward including: Twerton Infants School – Replace windows. Funding fully approved June 2021 to appoint a contractor; proposed phased programme of work to be carried out starting Summer 2021. Newbridge Primary – Replace boilers and heating system. Funding fully approved June 2021; contractor to be appointed June/July 2021 and proposed start on site July/August 2021.	864	864	-	-
SEND (Special Education Needs & Disability) Capital Programme	Projects under this scheme are:- - Bath Community Academy - Additional SEN Placements were created during 2020/21. A further feasibility study in underway to explore the options to move current provision at Bath Community Academy to another location on the site. Feasibility study outcomes expected July/August 2021. - St Mark's – Phase 1 is the creation of an additional 10 places, which will be complete for September 2021. Phase 2 is the creation of an additional 7-10 places, to complete in 2021/22. - Aspire Academy expansion to a 120 place special school - construction of a new classroom and adaptation of existing Bath Studio School buildings. Scheme to complete by Spring 2022. The Academy Trust are delivering the scheme and places will be available from September 2021.	1,589	1,589	-	-
Climate and Sustainable Travel					
Clean Air Zone	The Clean Air Zone objective is to achieve compliance with NO2 limit values. The charging zone launched as planned on 15th March 2021, with the sign and camera infrastructure, along with the highway works at Queen Square. The computer systems are fully operational and integrated both with existing Council IT systems and the central government systems for compliance checking and payment. Other "non-core items" of circa £1m are now being progressed including public realm, other air quality and transportation measures. The roll out of up to £6.7m financial assistance grants is also underway with applications processed by our three specialist finance partner organisations.	-	-	-	-
Liveable Neighbourhoods	The Low Traffic Neighbourhoods policies have been adopted with Cabinet Report agreeing initial funding.	1,000	1,000	-	-

CAPITAL APPENDIX 2 - KEY SCHEME VARIANCE ANALYSIS

	Narrative	2021/22 Budget	2021/22 Forecast	Rephasing to Future Years	Under / Over Spend
		£'000	£'000	£'000	£'000
Economic Development and Resources					
Bath Quays Bridge & Linking Infrastructure	Works continue to progress on the project with the bridge dynamic testing complete. Engineering works to close out the bridge links at the South and North banks will continue throughout 2021.	253	253	-	-
Bath Quays North	The Developer has previously obtained approval to S96A and S73 planning applications which enabled the submission of the Reserved Matters Application (RMA) in January 2021. Following considerable dialog with the LPA on detailed design, it is expected to proceed to planning committee in Q2 of 2021/22, Advanced enabling works continue, to prepare the site for development, including the diversion of utilities and creation of temporary car parking. The impacts on scheme delivery caused by Covid-19 and lockdown continue to be evaluated, with market risks from occupier interest and construction inflation increasing delivery risk and impacting programme. Options to mitigate the more challenging financial viability arising are being considered to secure the delivery of the scheme.	6,519	6,519	-	-
Bath Quays South	No.1 Bath Quays (new offices) reached practical completion in May with levels of interest from the occupier market rebounding following easing of lockdown restrictions. Newark Works refurbishment is progressing with significant additional works committed to improve energy performance. Public Realm works are now being programmed to commence in the autumn	3,315	3,315	-	-
BWR Phase 2	The infrastructure pre-works have completed and the major gas network rationalisation works now commenced with completion in April 2022. Planning consent for residential redevelopment at Midland Road waste site was granted 17 Dec 2020. Cashflow between financial year is being updated to accelerate works as much as possible. Re-profiling will be made by technical adjustment following Homes England (funder) approval.	13,179	8,250	4,929	-
Corporate Estate Planned Maintenance	Planned works for the summer of 2021/22 include a replacement heat reclaim boiler at Haycombe Crematorium along with refurbishment works to public areas including improvements to the disabled access for the Crematorium chapel. Elsewhere we plan to upgrades to emergency lighting and other works at Beaumonds Childrens Home.	2,111	2,111	-	-
Property Company Investment - Council (Loan): Developments	During 2021/22 loans will fund the development of Sladebrook Road and Newbridge Hill. Both ACL and ADL continue to forecast loan repayments to agreed schedules for 2021/22.	12,113	12,113	-	-
Radstock Healthy Living Centre	Work is on-going on site with an expected completion date of Q4 2021/22	1,376	1,376	-	-
Roman Baths Archway Project	The main construction works for the City of Bath World Heritage Centre and Roman Baths Clore Learning Centre are now complete. The team are now working on the exhibition and fit-out; the contracts for this phase of works have been awarded and installation will complete in the Autumn.	475	475	-	-
Somer Valley Enterprise Zone - Infrastructure	Stakeholder engagement on SVEZ proposals will take place in Q2, with the formal Local Development Order (LDO) consultation due to take place in Q3. Pre-application responses to incorporate climate and nature emergency action has required further masterplan work, resulting in slippage to the LDO process.	741	741	-	-
York Street Vaults Phase2	Trench tests have been completed to assess causes of water ingress into the vaults. Work on the Swallow St public realm was due to start on-site in June 2021 with natural stone finished paving slabs similar to Stall Street and new drainage being installed. Work to complete the public realm works on York Street will be in the new year.	614	614	-	-
Keynsham High Street Renewal Programme	Phase 1 works for the Public Realm scheme for Keynsham High Street are underway to revitalise the town centre and enhancing the accessibility by alternative modes of travel. Grant funded Heritage Action Zone works will deliver further public realm, a masterplan, shop front improvements, wayfinding, community engagement and a cultural programme.	2,077	2,077	-	-
Midsomer Norton High Street Renewal Programme	Work on the grant funded Heritage Action Zone works is continuing to budget. Detailed design and technical work for a submission of a Full Business Case to WECA for Love Our High Street funding expected for September 2021.	367	367	-	-
Bath City Centre Renewal Programme	Developing a programme of public realm improvements and enabling infrastructure to support the response to Covid-19 and the re-opening and renewal of the City Centre. An application has been submitted to WECA to expand the scope/value of the project. Designs are underway for Kingsmead Square Phase 2 described elsewhere in the agenda.	340	340	-	-
Public Sector Decarbonisation Scheme	The Council has received £442k grant for the Public Sector Decarbonisation Scheme for Charlton House Care Home. Design for heating and hot water being finalised, along with solar PV to provide electricity to power the site and other measures to reduce energy demand through better insulation and lighting upgrades. We have also received £557K grant to passport to Cleveland Pools Trust for the installation of a Water Source Heat Pump to provide heat for the pools.	999	999	-	-

2021/22 Revenue Virements for INFORMATION

Appendix 3 (i)

<u>REF NO</u>	<u>REASON / EXPLANATION</u>	<u>CABINET PORTFOLIO</u>	<u>TRANSFER FROM CASHLIM</u>	<u>Income (£'s)</u>	<u>Expenditure (£'s)</u>	<u>CABINET MEMBER</u>	<u>TRANSFER TO CASHLIM</u>	<u>Income (£'s)</u>	<u>Expenditure (£'s)</u>	<u>DESCRIPTION</u>	<u>ONGOING EFFECTS</u>
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The following virements have either been previously approved, are technical in nature or are below limits within BMS that require approval, and therefore are reported for information only.

INFO 21#01	Revenue Grants Unapplied	Economic Development & Resources	Balances (Earmarked Reserve)		9,376	Planning	Building Control & Public Protection		9,376	Technical accounting adjustment to fully recognise unconditional revenue grants fully in year of receipt, which were transferred into the reserve at 2020/21 year-end.	Budget virement is one-off.
INFO 21#02	Waste Service Redesign	Economic Development & Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		49,172	Neighbourhood Services	Neighbourhoods & Environment - Waste & Fleet Services		49,172	Ongoing transfer of corporately held budget for Waste Service Redesign to match 2020/21 spend in service.	Budget Virement is ongoing.
INFO 21#03	Business Intelligence Centralisation - Information Technology	Economic Development & Resources	Information Technology		48,244	Economic Development & Resources	Corporate Governance		48,244	Transfer of responsibility for System Designer post from Information Technology to Business Intelligence Team, as part of the Business Intelligence centralisation.	Budget Virement is ongoing.
INFO 21#04	IT Centralisation	Economic Development & Resources	Property Services		13,500	Economic Development & Resources	Information Technology		13,500	Transfer of service IT budgets in line with IT Services centralisation (Property Qube system).	Budget virement is ongoing.
INFO 21#05	WECA Levy	Transport Services	Transport & Parking Services - Public & Passenger Transport		54,000	Economic Development & Resources	West of England Combined Authority Levy		54,000	Additional budget for Concessionary Fares paid as part of the WECA Levy, funded by contingency budget held in Passenger Transport.	Budget Virement is ongoing.
INFO 21#06	Business Intelligence Centralisation - Children's Services	Children & Young People, Communities & Culture	Inclusion & Prevention		68,222	Economic Development & Resources	Corporate Governance		68,222	Transfer of responsibility of Data Analyst posts from Children's Services to Business Intelligence Team, as part of the Business Intelligence centralisation.	Budget Virement is ongoing.
INFO 21#07	Mead Lane Mooring	Economic Development & Resources	Regeneration		10,000	Neighbourhood Services	Neighbourhoods & Environment - Parks & Bereavement Services		10,000	Correction of allocation of 2021/22 Base Budget reduction to the one-off budget previously allocated to Regeneration for Mead Lane mooring survey work.	Budget Virement is ongoing.

REF NO	REASON / EXPLANATION	CABINET PORTFOLIO	TRANSFER FROM		CABINET MEMBER	TRANSFER TO		DESCRIPTION	ONGOING EFFECTS			
			CASHLIM	Income (£'s)		Expenditure (£'s)	CASHLIM			Income (£'s)	Expenditure (£'s)	
INFO 21#08	Connecting Data Grant	Economic Development & Resources	Corporate Governance		Economic Development & Resources	Human Resources & Organisational Development		143,307	143,307	Correction of allocation of reduction to 2021/22 Base Budget, in relation to the one-off budget given in 2020/21 for the Connecting Data grant previously received. This was allocated to the incorrect Cash Limit in the 2021/22 budget.	Budget Virement is ongoing.	
INFO 21#09	IT Centralisation	Children & Young People, Communities & Culture	Customer Services (including Libraries)		9,147	Economic Development & Resources	Information Technology		21,207	Transfer of service IT budgets in line with IT Services centralisation.	Budget Virement is ongoing.	
		Neighbourhood Services	Neighbourhoods & Environment - Parks & Bereavement Services		10,800							
		Transport Services	Transport & Parking Services - Parking		1,260		Business Change					1,100
		Planning	Development Management		1,100							
INFO 21#10	Tree & Woodlands Post	Planning	Development Management		60,000	Climate & Sustainable Travel	Sustainability		60,000	Realigning of budget following transfer of management for Tree & Woodlands.	Budget Virement is ongoing.	
INFO 21#11	Bath & North East Somerset Community Safety & Safeguarding Partnership (BCSSP)	Children & Young People, Communities & Culture	Safeguarding - CYP		2,419	Adults & Council House Building	Adult Services		2,419	Realignmenet of B&NES Community Safety & Safeguarding Partnership (BCSSP) budget, to reflect the budget that was agreed at the BCSSP Board meeting in June 2021.	Budget Virement is ongoing.	
INFO 21#12	Webcasting	Economic Development & Resources	Corporate Strategy & Communications		24,000	Economic Development & Resources	Corporate Governance		24,000	Realigning of budget following transfer of management for Webcasting.	Budget Virement is ongoing.	
INFO 21#13	Commercial Estate Debt Recovery	Economic Development & Resources	Property Services		44,310	Economic Development & Resources	Commercial Estate		44,310	Realigning of budget following transfer of line management of Debt Recovery post.	Budget Virement is ongoing.	

REF NO	REASON / EXPLANATION	CABINET PORTFOLIO	TRANSFER FROM CASHLIM	Income (£'s)	Expenditure (£'s)	CABINET MEMBER	TRANSFER TO CASHLIM	Income (£'s)	Expenditure (£'s)	DESCRIPTION	ONGOING EFFECTS
INFO 21#14	Business Intelligence Centralisation - Housing	Adults & Council House Building	Housing		23,735	Economic Development & Resources	Corporate Governance		23,735	This relates to the transfer of the Data Analysis and Systems Officer. This transfer was undertaken as part of the Council's centralisation of Performance and Business Intelligence staff	Budget Virement is ongoing.
INFO 21#15	Incremental Salary Growth	Economic Development & Resources	Corporate Budgets incl. Capital, Audit & Bank Charges		369,608	Economic Development & Resources	Various		106,630	Distribution of Corporately held budget for incremental salary increases.	Budget virement is ongoing.
						Adults & Council House Building	Various		89,732		
						Children & Young People, Communities & Culture	Various		103,563		
						Climate & Sustainable Travel	Sustainability		683		
						Neighbourhood Services	Various		22,000		
						Planning	Development Management		47,000		
OVERALL TOTALS				0	942,200			0	942,200		

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Portfolio Cash Limits 2021/22 - Revenue Budgets

Appendix 3(ii)

CABINET PORTFOLIO	Service	2021/22 Approved Budget	May 2021 Cabinet Portfolio Changes: Cash Limit Rebasings	2021/22 Approved Budget - Rebased to New Portfolios	Technical Adjustments, below BMS limits or already agreed - shown for information	Total Virements for Approval	Ju21 Revised Cash Limits
		£'000	£'000	£'000	£'000	£'000	£'000
Leader	Housing Delivery Vehicle	(1,000)	1,000				
	Visit Bath	76	(76)				
	PORTFOLIO SUB TOTAL	(924)	924				
Resources (Deleted)	Finance	2,972	(2,972)				
	Risk & Assurance Services	1,179	(1,179)				
	Procurement & Commissioning	240	(240)				
	Revenues & Benefits	1,317	(1,317)				
	Council Solicitor & Democratic Services	2,552	(2,552)				
	Information Technology	5,305	(5,305)				
	Strategy & Performance	2,581	(2,581)				
	Human Resources & Organisational Development	1,274	(1,274)				
	Property Services	616	(616)				
	Corporate Estate Including R&M	3,447	(3,447)				
	Commercial Estate	(10,216)	10,216				
	Hsg / Council Tax Benefits Subsidy	(195)	195				
	Capital Financing / Interest	6,830	(6,830)				
	Unfunded Pensions	1,588	(1,588)				
	Corporate Budgets incl. Capital, Audit & Bank Charges	(5,293)	5,293				
	New Homes Bonus Grant	(3,064)	3,064				
	Magistrates	12	(12)				
	Coroners	335	(335)				
	Environment Agency	251	(251)				
West of England Combined Authority Levy	5,094	(5,094)					
PORTFOLIO SUB TOTAL	16,825	(16,825)					
Economic Development & Resources (New)	Heritage Services		(5,447)	(5,447)			(5,447)
	World Heritage		155	155	2		158
	Regeneration		264	264	(10)		254
	Business & Skills		449	449			449
	Property Services		616	616	(58)		559
	Corporate Estate Including R&M		3,447	3,447			3,447
	Business Change				1		1
	Human Resources & Organisational Development		1,568	1,568	287		1,854
	Council Solicitor & Democratic Services		2,552	2,552	1		2,553
	Corporate Strategy & Communications		1,021	1,021	(24)		997
	Finance		2,679	2,679	37		2,716
	Revenues & Benefits		1,317	1,317	10		1,326
	Risk & Assurance Services		1,179	1,179	17		1,196
	Procurement & Commissioning		240	240			240
	Corporate Governance		1,421	1,421	(105)		1,316
	Information Technology		5,305	5,305	8		5,314
	Commercial Estate		(10,216)	(10,216)	44		(10,172)
	Housing Delivery Vehicle		(1,000)	(1,000)			(1,000)
	Visit Bath		76	76			76
	Hsg / Council Tax Benefits Subsidy		(195)	(195)			(195)
	Capital Financing / Interest		6,830	6,830			6,830
	Unfunded Pensions		1,588	1,588			1,588
	Corporate Budgets incl. Capital, Audit & Bank Charges		(5,293)	(5,293)	(419)		(5,712)
	New Homes Bonus Grant		(3,064)	(3,064)			(3,064)
	Magistrates		12	12			12
	Coroners		335	335			335
	Environment Agency		251	251			251
West of England Combined Authority Levy		5,094	5,094	54		5,148	
PORTFOLIO SUB TOTAL		11,183	11,183	(154)		11,029	
Adult Services (Deleted)	Adult Services	62,112	(62,112)				
	Adult Substance Misuse (Drug Action Team)	157	(157)				
	Public Health						
PORTFOLIO SUB TOTAL	62,269	(62,269)					
Adults & Council House Building (New)	Adult Services		62,043	62,043	57		62,100
	Housing		1,395	1,395	11		1,406
	PORTFOLIO SUB TOTAL		63,438	63,438	68		63,507
Children's Services (Deleted)	Children, Young People & Families	17,994	(17,994)				
	Integrated Commissioning - CYP	2,626	(2,626)				
	Safeguarding - CYP	10	(10)				
	Inclusion & Prevention	3,246	(3,246)				
	Education Transformation	6,629	(6,629)				
	Schools Budget	(1,923)	1,923				
PORTFOLIO SUB TOTAL	28,583	(28,583)					
Children & Young People, Communities & Culture (New)	Children, Young People & Families		17,994	17,994	52		18,046
	Integrated Commissioning - CYP		2,626	2,626			2,626
	Safeguarding - CYP		80	80	(2)		77
	Inclusion & Prevention		3,246	3,246	(46)		3,201
	Education Transformation		6,629	6,629	5		6,635
	Schools Budget		(1,923)	(1,923)	1		(1,922)
	Adult Substance Misuse (Drug Action Team)		157	157			157
	Public Health						
	Events & Active Lifestyles		180	180	1		181
	Customer Services (including Libraries)		2,124	2,124	12		2,136
	Community Safety		193	193			193
PORTFOLIO SUB TOTAL		31,306	31,306	24		31,329	
Climate Emergency & Neighbourhood Services (Deleted)	Neighbourhoods & Environment - Waste & Fleet Services	16,301	(16,301)				
	Sustainability	447	(447)				
	Environmental Monitoring (Air Pollution)	211	(211)				
PORTFOLIO SUB TOTAL	16,959	(16,959)					
Climate & Sustainable Travel (New)	Sustainability		586	586	1		587
	Environmental Monitoring (Air Pollution)		211	211			211
	Clean Air Zone						
	Transport Planning, Policy and Sustainable Transport		371	371			371
PORTFOLIO SUB TOTAL		1,169	1,169	1		1,169	

CABINET PORTFOLIO	Service	2021/22 Approved Budget	May 2021 Cabinet Portfolio Changes: Cash Limit Rebasing	2021/22 Approved Budget - Rebased to New Portfolios	Technical Adjustments, below BMS limits or already agreed - shown for information	Total Virements for Approval	Ju/21 Revised Cash Limits
		£'000	£'000	£'000	£'000	£'000	£'000
Neighbourhood Services (New)	Leisure		517	517			517
	Neighbourhoods & Environment - Waste & Fleet Services		16,301	16,301	58		16,359
	Neighbourhoods & Environment - Parks & Bereavement Services		1,058	1,058	3		1,061
	Highway Maintenance		6,268	6,268			6,268
	Registrars Service		(75)	(75)	9		(66)
	PORTFOLIO SUB TOTAL		24,069	24,069	70		24,139
Transport Services	Highways & Traffic Management	7,493	(7,493)				
	Network & Traffic Management		854	854			854
	Transport & Parking Services - Parking	(4,462)		(4,462)	(1)		(4,463)
	Transport & Parking Services - Public & Passenger Transport	18		18	(54)		(36)
	Emergency Planning	423		423			423
	PORTFOLIO SUB TOTAL	3,473	(6,639)	(3,166)	(55)		(3,221)
Planning (New)	Building Control & Public Protection		745	745	9		754
	Development Management		1,329	1,329	46		1,375
	PORTFOLIO SUB TOTAL		2,074	2,074	55		2,130
Housing, Planning & Economic Development (Deleted)	Housing	1,395	(1,395)				
	Regeneration	264	(264)				
	Development Management	1,329	(1,329)				
	Business & Skills	449	(449)				
		PORTFOLIO SUB TOTAL	3,437	(3,437)			
Community Services (Deleted)	Building Control & Public Protection	745	(745)				
	Heritage	(5,447)	5,447				
	Leisure	517	(517)				
	Community Safety	193	(193)				
	Neighbourhoods & Environment - Parks & Bereavement Services	1,058	(1,058)				
	World Heritage	155	(155)				
	Registrars Service	(75)	75				
	Events & Active Lifestyles	180	(180)				
	Customer Services (including Libraries)	2,124	(2,124)				
		PORTFOLIO SUB TOTAL	(550)	550			
	NET BUDGET	130,072		130,072	9		130,081

Sources of Funding

Council Tax	102,040		102,040			102,040
Retained Business Rates	22,115		22,115			22,115
Collection Fund Deficit (-) or Surplus (+)	(1,328)		(1,328)			(1,328)
Business Rates Collection Fund Deficit (20/21) - Retail Relief Element	(39,147)		(39,147)			(39,147)
Transfer from Business Rates Retail Relief s31 Grant Reserve	39,147		39,147			39,147
Transfers (to) / from Reserves	7,245		7,245	9		7,254
Total	130,072		130,072	9		130,081

Capital Virements Apr - June - Additions & Reductions 2021/22

Appendix 4 (i)

REF NO	REASON / EXPLANATION	TRANSFER / FUNDING FROM	Income (£'s)	Expenditure (£'s)	TRANSFER TO	Income (£'s)	Expenditure (£'s)	Notes
CAP2122#001	Parks S106 Projects	3rd Party Contribs	8,350		Community Services		8,350	Technical Adjustment approved by the Director of Development & Public Protection. Additional Keynsham Town Council Contribution towards the cost of a wheelchair accessible platform swing.
CAP2122#002	Public Sector Decarbonisation Scheme	Govt Grant	442,000		Resources & Deputy Leader		442,000	Officer Delegated Decision on 26/4/21 by Chief Operating Officer. Grant for the Public Sector Decarbonisation Scheme for Charlton House Care Home to make sites more energy efficient through energy reduction and on site renewable energy generation.
CAP2122#003	Public Sector Decarbonisation Scheme	Govt Grant	557,000		Resources & Deputy Leader		557,000	Officer Delegated Decision on 20/5/21 by Chief Finance Officer (S151) grant for the Public Sector Decarbonisation Scheme for Cleveland Pools to make sites more energy efficient and install low carbon heating systems like heat pumps, heating controls, glazing and insulation.
CAP2122#004	Heritage Services Energy Capture Scheme	SSB	200,000		Community Services		200,000	Officer Delegated Decision by Chief Finance Officer on 13/05/21 (S151). To capture energy from the hot spring at the Roman Baths, to reduce the consumption of gas for heating from the existing gas boilers.
CAP2122#005	Disabled Facilities Grant	Govt Grant	171,116		Housing, Planning and Economic Dev		171,116	Technical Adjustment to realign budget to Government Grant Announcement.
CAP2122#006	Supported Housing Scheme	Revenue	616,000		Housing, Planning and Economic Dev		616,000	Decision E3246 approved 13/05/21. New supported housing to accommodate up to eleven households to stay locally to prepare for permanent rehousing.
CAP2122#007	Transport Improvement Programme	Bath CIL	-25,000		Transport Services		-25,000	Technical Adjustment to realign budget to CIL funding for pedestrian crossing at Lansdown Road.
CAP2122#008	Transport Improvement Programme	CIL	-68,150		Transport Services		-68,150	Technical Adjustment to realignment of budget to CIL funding for A37 / Woollard Lane.
CAP2122#009	Air Quality Monitors	CSB	16,970		Climate Emergency & Neighbourhood Services		16,970	Officer Delegated Decision on 29/4/21 by Director of Place. A package of measures developed in the Air Quality Action Plan (AQAP) designed to improve air quality in Temple Cloud.
CAP2122#010	Property Improvement - Haycombe Crematorium Dignified Entrance	CSB	35,000		Resources & Deputy Leader		35,000	Officer Delegated Decision on 12/4/21 by Director of Place. Standard good working practice to provide a sanitary, temperature controlled reverent space.
CAP2122#011	Cleveland Bridge Refurb	Govt Grant	3,560,000		Transport Services		3,560,000	Decision 2/3/2021 approved by Director Partnership & Corporate Services. Refurbishment of Cleveland Bridge in 2021 funded from Department for Transport Grant Award.
CAP2122#012	SEND Provision	Govt Grant	45,000		Children Services		45,000	Officer Delegated Decision on 24/5/21 by Director of Education Transformation. To expand a resource base at St Marks School for children with Moderate Learning Difficulties (MLD).
CAP2122#013	Affordable Warmth Grant Scheme	Govt Grant, Revenue	716,000		Housing, Planning and Economic Dev		716,000	Officer Delegated Decision on 2/6/21 by Director of Partnership & Corporate Services to establish a grant assistance scheme for low income households to raise the energy efficiency rating of their homes.
CAP2122#014	Preparing for the Future - New Technology	CSB, revenue	1,653,000		Resources & Deputy Leader		1,653,000	Officer Delegated Decision on 2/6/2021 by Chief Financial Officer (S151) to purchase of IT assets to facilitate new blended working practises
CAP2122#015	Office for Low Emission Vehicles (OLEV) Bid	Govt grant, WECA grant	572,180		Transport Services		572,180	Officer Delegated Decision on 9/4/21 by Director of Place Management. Project to install more electric vehicle charging points in the District
CAP2122#016	Transport Improvement Programme	WECA grant	-57,500		Transport Services		-57,500	Officer Delegated Decision on 9/4/21 by Director of Place Management. Project to install more electric vehicle charging points in the District
CAP2122#017	Office for Low Emission Vehicles (OLEV) Bid	Govt grant	281,820		Transport Services		281,820	Technical Adjustment to budget to Government Grant
CAP2122#018	Schools Capital Maintenance Schemes	Govt grant	584,000		Children Services		584,000	Officer Delegated Decision on 9/6/21 by Director of Education and Safeguarding to replace the windows and doors at Twerton Infant School
CAP2122#019	Schools Capital Maintenance Schemes	Govt grant	280,000		Children Services		280,000	Officer Delegated Decision on 9/6/21 by Director of Education and Safeguarding to replace the heating system at Newbridge Primary School.
CAP2122#020	Neighbourhood Services Asset & Vehicle Replacement	SSB	1,364,653		Climate Emergency & Neighbourhood Services		1,364,653	Officer Delegated Decision on 4/6/21 by Director of Environment to approve vehicle replacements for 2021-22
CAP2122#021	Neighbourhood Services Asset & Vehicle Replacement	Revenue	13,347		Climate Emergency & Neighbourhood Services		13,347	Officer Delegated Decision on 4/6/21 by Director of Environment to approve vehicle replacements for 2021-22
CAP2122#022	Liveable Neighbourhoods		1,000,000		Transport Services		1,000,000	Cabinet Decision E3285 - £1m to provide initial funding to support detailed design and delivery of priority schemes -Low Traffic Neighbourhoods; Residents' Parking Schemes; and On-Street Electric Vehicle Charging Strategy.
Total			11,965,786				11,965,786	

Capital Virements - Additions & Reductions Future Years

Appendix 4 (i)

REF NO	REASON / EXPLANATION	TRANSFER / FUNDING FROM	Income (£'s)	Expenditure (£'s)	TRANSFER TO	Income (£'s)	Expenditure (£'s)	Notes
FY CAP2122#001	Disabled Facilities Grant	Govt Grant	513,348		Housing, Planning and Economic Dev		513,348	Realignment of budget to Government Grant Announcement 22/23 to 24/25 £171K p.a..
OVERALL TOTALS			513,348	513,348			513,348	

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Capital Programme by Portfolio - 2021/2022
Revised Capital Cash Limits by Portfolio

Appendix 4 (ii)

Capital Scheme	Cap Prog Number	Total Approved Budget 2021/22	Feb-Mar Virements	Apr-Jun Virements	Revised Budget at July 2021 Cabinet	Memo: Outturn Re-phasing Request at July 2021 Cabinet	Memo: Budget after July 2021 Cabinet
		£'000	£'000	£'000	£'000	£'000	£'000
Economic Development and Resources							
Agresso System Development & Upgrade	Cap1415125	65	-	-	65	10	75
Bath Quays Bridge & Linking Infrastructure	Cap1617037	253	-	-	253	2,265	2,518
Bath Quays North	Cap1415114	6,519	-	-	6,519	4,728	11,247
Bath Quays South	Cap1415138	3,315	-	-	3,315	1,201	4,516
Bath Streetspace	Cap1920026	340	-	-	340	48	388
BWR - Council Project Team	Cap1415057	- 58	-	-	- 58	-	- 58
BWR - Infrastructure	Cap1415059	- 91	-	-	- 91	-	- 91
BWR - Relocation of Gas Holders	Cap1415065	1,536	-	-	1,536	-	1,536
BWR Phase 2	Cap1920012	13,179	-	-	13,179	- 299	12,879
Bath Area Forum - CIL Funded Schemes - Approved	Cap1718068	-	-	-	-	305	305
Capital Contingency	Cap1415131	408	-	-	408	1,764	2,172
Cleveland Pools Grant	Cap1718065	-	-	-	-	7	7
Commercial Estate Refurbishment Programme	Cap1920022	-	-	-	-	344	344
Corporate Estate Planned Maintenance	Cap1415097	2,111	-	-	2,111	1,615	3,726
Customer Payments Security and Channel Shift	Cap1920021	39	-	-	39	- 4	35
Digital B&NES	Cap1415069	100	-	-	100	108	208
Equality Act Works	Cap1415104	-	-	-	-	103	103
Flexible Use of Capital Receipts	Cap1819080	3,162	-	-	3,162	404	3,566
Grand Parade & Undercroft	Cap1415103	-	-	-	-	133	133
Heritage Infrastructure Development	Cap1415052	-	11	-	11	10	20
Heritage Services Energy Capture Scheme	Cap1819030	338	-	200	538	- 7	531
Innovation Quay - Strategic Flooding Solution	Cap1415064	145	-	-	145	- 1	144
IT Asset Refresh	Cap1819061	50	-	-	50	- 34	16
Keynsham High Street Renewal Programme	Cap1718011	2,077	-	-	2,077	334	2,411
Keynsham Regeneration & New Build	Cap1415094	-	-	-	-	68	68
Midsomer Norton High Street Renewal Programme	Cap1819050	367	-	-	367	49	416
North Keynsham SDL	Cap1819091	-	300	-	300	259	559

Capital Programme by Portfolio - 2021/2022
Revised Capital Cash Limits by Portfolio

Appendix 4 (ii)

Capital Scheme	Cap Prog Number	Total Approved Budget 2021/22	Feb-Mar Virements	Apr-Jun Virements	Revised Budget at July 2021 Cabinet	Memo: Outturn Re-phasing Request at July 2021 Cabinet	Memo: Budget after July 2021 Cabinet
		£'000	£'000	£'000	£'000	£'000	£'000
NRR Infrastructure	Cap1415062	-	-	-	-	115	115
Office Reconfiguration Costs	CAP2122005	-	-	-	-	12	12
Preparing for the Future - New Technology	cap2122020	-	-	1,653	1,653	0	1,653
Project Inception Fund	Cap1819062	-	-	-	-	13	13
Property Company Investment	Cap1617027	12,113	-	-	12,113	657	12,769
Property Disposals	Cap1415098	-	-	-	-	647	647
Property Improvement - Haycombe Crematorium Dignified Entrance	CAP1920047	60	-	35	95	14	81
Property Improvement - Orange Grove Structural Works	CAP1920036	-	760	-	760	3	763
Public Sector Decarbonisation Scheme	Cap2122018	-	-	999	999	-	999
Radstock & Westfield Implementation Plan	Cap1516014	-	-	-	-	3	3
Radstock Healthy Living Centre	Cap1718061	1,376	-	-	1,376	119	1,495
Refresh of Network Switch Equipment	CAP1920037	-	-	-	-	-	-
Roman Baths Archway Centre	Cap1617021	112	363	-	475	56	532
Saw Close Works	Cap1516008	19	-	-	19	14	33
Somer Valley Enterprise Zone - Infrastructure	Cap1718067	741	-	-	741	311	1,052
Voicemail Upgrade	CAP1920038	-	-	-	-	8	8
Waterspace	Cap1920029	54	-	-	54	5	59
Workplaces Programme Delivery	Cap1415093	-	-	-	-	-	-
York Street Vaults Phase 2	Cap1819059	614	-	-	614	242	855
Subtotal Full Approval - Economic Development and Resources		48,943	1,434	2,887	53,264	15,577	68,841

Capital Programme by Portfolio - 2021/2022
Revised Capital Cash Limits by Portfolio

Appendix 4 (ii)

Capital Scheme	Cap Prog Number	Total Approved Budget 2021/22	Feb-Mar Virements	Apr-Jun Virements	Revised Budget at July 2021 Cabinet	Memo: Outturn Re-phasing Request at July 2021 Cabinet	Memo: Budget after July 2021 Cabinet
		£'000	£'000	£'000	£'000	£'000	£'000
Climate and Sustainable Travel							
Air Quality Management Area	Cap1819028	-	-	17	17	-	17
Clean Air Zone	Cap1920031	-	-	-	-	6,548	6,548
Liveable Neighbourhoods	Cap1920003	-	-	1,000	1,000	-	1,000
Subtotal Full Approval - Climate and Sustainable Travel		-	-	1,017	1,017	6,548	7,565
Adults and Council House Building							
Adult Social Care Database Replacement	Cap1516005	50	-	-	50	72	122
Affordable Housing	Cap1415091	300	-	616	916	580	1,496
Affordable Warmth Grant Scheme	Cap2021004	-	-	716	716	249	965
Community Resource Centre Capital Investment	Cap1718076	-	-	-	-	62	62
Disabled Facilities Grant	Cap1415089	1,271	-	171	1,442	904	2,346
Englishcombe Lane Development	Cap1920034	250	-	-	250	298	548
Housing Delivery Vehicle	Cap1516042	600	-	-	600	252	852
Next Steps Accommodation Programme	Cap2021006	-	810	-	810	1,129	1,939
Subtotal Full Approval - Adults and Council House Building		2,471	810	1,503	4,784	3,546	8,330
Children and Young People, Communities and Culture							
Basic Needs - School Improvement / Expansion	Cap1415135	3,206	-	-	3,206	2,386	5,592
Building Adaptations to Provide Short Breaks for Disabled Children	Cap1415078	20	-	-	20	-	20
Children's Centre Capital Schemes	Cap1415196	-	-	-	-	27	27
Schools' Capital Maintenance Schemes	Cap1415073	-	-	864	864	1,236	2,100
Schools Devolved Capital	Cap1920028	-	-	-	-	21	21
Special Education Needs & Disability (SEND) Education Provision	Cap1718071	1,544	-	45	1,589	683	2,272
Subtotal Full Approval - Children and Young People, Communities and Culture		4,770	-	909	5,679	4,353	10,033

Capital Programme by Portfolio - 2021/2022
Revised Capital Cash Limits by Portfolio

Appendix 4 (ii)

Capital Scheme	Cap Prog Number	Total Approved Budget 2021/22	Feb-Mar Virements	Apr-Jun Virements	Revised Budget at July 2021 Cabinet	Memo: Outturn Re-phasing Request at July 2021 Cabinet	Memo: Budget after July 2021 Cabinet
		£'000	£'000	£'000	£'000	£'000	£'000
Neighbourhood Services							
Alice Park - Skate Park	Cap1415035	-	-	-	-	42	42
Bath Leisure Centre Refurbishment	Cap1516006	-	-	-	-	388	388
Bathscape	Cap1819011	174	20	-	154	30	184
Beechen Cliff Woodland & Other Open Spaces Improvements	Cap1415017	-	-	-	-	6	6
City Centre Security	Cap1920027	385	-	-	385	81	304
Cleveland Bridge Refurbishment	Cap1920040	-	-	3,560	3,560	-	3,560
Clutton Depot Refurbishment	Cap1920032	115	-	-	115	1	116
Environmental Protection Vehicles	Cap1516028	18	-	-	18	10	28
Haycombe Crematorium	Cap1819029	47	-	-	47	34	81
Highways Maintenance Programme	Cap1415184	5,806	-	-	5,806	28	5,834
Highways & Traffic Fleet Vehicle Renewal	Cap1920015	-	-	-	-	38	38
Leisure - Council Client / Contingency	Cap1516049	-	-	-	-	156	156
Leisure Bath - Car Park	Cap1718043	-	-	-	-	2	2
Leisure Facility Modernisation - Keynsham Sports Centre	Cap1516051	-	-	-	-	86	86
Neighbourhood Services - Asset & Vehicle Replacement Programme	Cap1718036	45	-	1,378	1,423	715	2,138
Neighbourhoods Bin & Bench Replacement	Cap1415029	4	-	-	4	-	4
Parks and Bereavement Infrastructure	Cap1819051	-	-	-	-	51	51
Parks Equipment Replacement Programme	Cap1718029	-	-	-	-	6	6
Parks S106 Projects	Cap1718037	112	-	8	121	115	236
Play Area Refurbishment / Equipment	Cap1415039	65	-	-	65	165	230
Public Tennis Improvements	Cap1920010	-	-	-	-	434	434
Sydney Gardens	Cap1415030	2,249	-	-	2,249	172	2,422
Tree Planting	CAP2021005	-	25	-	25	119	144
Waste Collection Vehicles In Cab Technology	Cap1920025	23	-	-	23	124	147
Waste Service Redesign	Cap1617032	185	-	-	185	55	240
Waste Depot Relocation	Cap1516011	644	-	-	644	558	1,202
Waste Welfare Facilities	Cap2021003	-	-	-	-	58	58
Parking Vehicle Replacement Programme	Cap1415023	33	-	-	33	33	67

Capital Programme by Portfolio - 2021/2022
Revised Capital Cash Limits by Portfolio

Appendix 4 (ii)

Capital Scheme	Cap Prog Number	Total Approved Budget 2021/22	Feb-Mar Virements	Apr-Jun Virements	Revised Budget at July 2021 Cabinet	Memo: Outturn Re-phasing Request at July 2021 Cabinet	Memo: Budget after July 2021 Cabinet
		£'000	£'000	£'000	£'000	£'000	£'000
Passenger Transport Vehicles	Cap1516007	-	-	-	-	6	6
Somerdale Bridge, Keynsham – Initial Options Study	Cap1718016	9	-	-	9	0	9
Street Lighting LED Replacement Programme	Cap1617011	350	-	-	350	3	347
Subtotal Full Approval - Neighbourhood Services		10,264	5	4,946	15,216	3,348	18,563
Transport Services							
Bath Transport Package Main Scheme	Cap1415001	-	-	-	-	1,619	1,619
Hicks Gate Roundabout Improvement	Cap1718085	80	-	-	80	5	85
London Road Modification	Cap1718022	53	-	-	53	2	51
Office for Low Emission Vehicles (OLEV) Bid	Cap1617008	110	-	854	964	395	1,359
Transport Improvement Programme	Cap1415009	2,814	-	151	2,663	525	3,188
Subtotal Full Approval - Transport Services		3,057	-	703	3,760	2,543	6,304
TOTAL CAPITAL PROGRAMME		69,506	2,249	11,966	83,720	35,916	119,636

Sources of Funding							
Grants					38,613		
Council Support Including Borrowing and Capital Receipts					40,789		
S.106 contributions					1,303		
CIL contributions					1,867		
3rd Party Contributions					177		
Revenue					970		
TOTAL SOURCES OF FUNDING					83,720		

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Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING DATE:	20th July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3298
TITLE:	Treasury Management Outturn Report 2020/21	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1 – Performance Against Prudential Indicators		
Appendix 2 – The Council’s Investment Position at 31 st March 2021		
Appendix 3 – Average monthly rate of return for 2020/21		
Appendix 4 – The Council’s External Borrowing Position at 31 st March 2021		
Appendix 5 – Arlingclose’s Economic & Market Review Q4 of 2020/21		
Appendix 6 – Interest & Capital Financing Budget Monitoring 2020/21		
Appendix 7 – Summary Guide to Credit Ratings		

1 THE ISSUE

- 1.1 Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy’s Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code), which requires the Council to approve a Treasury Management Strategy before the start of each financial year, review performance during the year, and approve an annual report after the end of each financial year.
- 1.2 This report gives details of performance against the Council’s Treasury Management Strategy and Annual Investment Plan for 2020/21.

2 RECOMMENDATION

The Cabinet agrees that;

- 2.1 The Treasury Management Report to 31st March 2021, prepared in accordance with the CIPFA Treasury Code of Practice, is noted.
- 2.2 The Treasury Management Indicators to 31st March 2021 are noted.

3 THE REPORT

Summary

- 3.1 The average rate of investment return for 2020/21 is 0.41%, which is 0.43% above the benchmark rate.
- 3.2 The Council's Prudential Indicators for 2020/21 were agreed by Council in February 2020 and performance against the key indicators is shown in **Appendix 1**. All indicators are within target levels.

Summary of Returns

- 3.3 The Council's investment position as at 31st March 2021 is given in **Appendix 2**. The balance of deposits as at 31st December 2020 and 31st March 2021 are also set out in the pie charts in this appendix.
- 3.4 Gross interest earned on investments totalled £332k. **Appendix 3** details the investment performance, showing the average rate of interest earned over this period was 0.41%, which was 0.43% above the benchmark rate of average 7 day LIBID +0.05% (-0.02%). This excess is mainly due to the £5m investment held in the CCLA Local Authority Property Fund, which is a long term strategic investment earning a higher rate of interest (3.69% for 2020/21).
- 3.5 The level of return in 2020/21 was significantly lower than the previous financial year (0.41% in 2020/21 compared to 1.02% in 2019/20), which is due to decreases in interest rates across the globe resulting from the global pandemic. However as can be seen by the margin over the benchmark, actual performance against the benchmark of 0.43% in 2020/21 has remained similar to the 2019/20 rate of 0.44%.

Summary of Borrowings

- 3.6 The Council's external borrowing as at 31st March 2021 totalled £243.5 million and is detailed in **Appendix 4**. On 1st April 2020, the Council borrowed £15.0m short term from a local authority for general cashflow requirements, and to lower liquidity risks arising from uncertainties surrounding the Covid-19 pandemic at that time. No further borrowing was taken during the remainder of the year as cash balances remained high.
- 3.7 The Council's Capital Financing Requirement (CFR) as at 31st March 2021 was £326.9 million. This represents the Council's underlying need to borrow to finance capital expenditure and demonstrates that the borrowing taken to date relates to funding historical capital spend.
- 3.8 The CFR represents the underlying need to borrow and the difference from the current borrowing of £243.5 million represents re-investment of the internal cash balances and reserves, reducing the in-year borrowing costs in excess of the potential investment returns.
- 3.9 Following Local Government Reorganisation in 1996, Avon County Council's residual debt is administered by Bristol City Council. All successor Unitary Authorities make an annual contribution to principal and interest repayment, for which there is a provision in the Council's revenue budget. The amount of residual debt outstanding as at 31st March 2021 apportioned to Bath & North

East Somerset Council is £10.9m. Since this borrowing is managed by an external body and treated in the Council's Statement of Accounts as a deferred liability, it is not included in the borrowing figures referred to in paragraph 3.6.

3.10 The borrowing portfolio as at 31st March 2021 is shown in **Appendix 4**.

Strategic & Tactical Decisions

3.11 As shown in the charts in **Appendix 2**, the investment portfolio is diversified across Money Market Funds, Local Authorities, the CCLA Property Fund and highly rated UK Banks to maintain very short term liquidity and had overall investments of £72.5m invested as at 31st March 2021.

3.12 The Council does not hold any direct investments with banks in countries within the Eurozone reflecting both on the underlying debt issues in some Eurozone countries and the low levels of interest rates.

3.13 The Council's investment portfolio as at 31st March 2021 includes a total of £5m invested longer term in the CCLA Local Authorities Property Fund. Given the difficult economic climate and uncertainty over future cashflows, the Council did not make any additional longer-term investments this year.

3.14 The Council has reviewed its current investment holdings with its Treasury Management advisors to assess whether any of the investments placed are directly related to companies involved in fossil fuel activities. It was confirmed that the Council does not currently invest directly in equities or certificates of deposits that were not issued by banks or building societies and does not have any direct investments in fossil fuel companies.

3.15 The Council commissioned Arlingclose to undertake a review of possible ESG (Environmental, Social and Corporate Governance) funds into which the Council could invest surplus treasury assets. The report has been received and due diligence is being undertaken into specific funds for potential investment during 2021/22. The potential for making future ESG focussed investments is included in the 2021/22 Treasury Management Strategy, approved by Council in February 2021.

3.16 The Council's average investment return of 0.41% was below the budgeted level of 1.10%, although the impact of this is offset by the Council investment balances being higher than forecast and additional interest received from non-treasury activity.

Future Strategic & Tactical Issues

3.17 Our treasury management advisors full economic and market review for the year 2020/21 is included in **Appendix 5**.

3.18 The coronavirus pandemic dominated 2020/21, leading to almost the entire planet being in some form of lockdown during the year. The start of the financial year saw many central banks cutting interest rates as lockdowns caused economic activity to grind to a halt. The Bank of England cut Bank Rate to 0.1% and the UK government provided a range of fiscal stimulus measures, the size of which has not been seen in peacetime.

- 3.19 The Bank of England (BoE) held Bank Rate at 0.1% throughout the year but extended its Quantitative Easing programme by £150 billion to £895 billion at its November 2020 meeting. In its March 2021 interest rate announcement, the BoE noted that while GDP would remain low in the near-term due to COVID-19 lockdown restrictions, the easing of these measures means growth is expected to recover strongly later in the year. Inflation is forecast to increase in the near-term and while the economic outlook has improved there are downside risks to the forecast, including from unemployment which is still predicted to rise when the furlough scheme is eventually withdrawn.
- 3.20 After contracting sharply in Q2 (Apr-Jun) 2020 by 19.8% q/q, growth in Q3 and Q4 bounced back by 15.5% and 1.3% respectively. The easing of some lockdown measures in the last quarter of the calendar year enabled construction output to continue, albeit at a much slower pace than the 41.7% rise in the prior quarter. When released, figures for Q1 (Jan-Mar) 2021 are expected to show a decline given the national lockdown.
- 3.21 The 5-year UK benchmark gilt yield began the financial year at 0.18% before declining to -0.03% at the end of 2020 and then rising strongly to 0.39% by the end of the financial year. Over the same period the 10-year gilt yield fell from 0.31% to 0.19% before rising to 0.84%. The 20-year declined slightly from 0.70% to 0.68% before increasing to 1.36%.
- 3.22 The benefits of the Council's current policy of internal borrowing are monitored regularly against the likelihood that long term borrowing rates are forecast to rise in future years. The focus remains on the rate of increase and the medium-term peak.
- 3.23 The borrowing that took place in 2020/21 is therefore driven by a need to maintain an appropriate working cash balance rather than any immediate changes to interest rates.
- 3.24 Due to the high cash balances held by the Council at the end of 2020/21, a decision was made to repay the £15m one-year loan taken at the start of 2020/21 from the London Borough of Bromley upon its 1st April 2021 maturity date.
- 3.25 The Council is seeking advice from its treasury advisors on the potential option to make an early repayment of a £10m LOBO loan during 2021/22 as part of a debt rescheduling approach. This provides potential to make revenue savings and reduce risk by replacing the LOBO debt with a PWLB loan at a lower interest rate with the replacement loan duration more aligned to the Council's future borrowing profile. A financial appraisal is being undertaken into the restructuring options and the decision whether to proceed will be taken by the S151 Officer in line with the approved Treasury Management Strategy.

Borrowing update

- 3.26 In November 2020 the PWLB published its response to the consultation on 'Future Lending Terms'. From 26th November, the margin on PWLB loans above gilt yields was reduced from 1.8% to 0.8%, provided that the borrowing Authority can confirm that it is not planning to purchase 'investment assets primarily for yield' in the current or next two financial years. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to

access the PWLB, except to refinance existing loans or externalise internal borrowing. As part of the borrowing process, Authorities will now be required to submit more detailed capital expenditure plans with confirmation of the purpose of capital expenditure from the Section 151 Officer.

- 3.27 Acceptable use of PWLB borrowing includes service delivery, housing, regeneration, preventative action, refinancing and treasury management. Misuse of PWLB borrowing could result in the PWLB requesting that the Authority unwinds problematic transactions, suspending access to the PWLB and repayment of loans with penalties.
- 3.28 Competitive market alternatives may be available for authorities with or without access to the PWLB. However, the financial strength of the individual authority and borrowing purpose will be scrutinised by commercial lenders.
- 3.29 As the Council is not currently planning to purchase any investment assets primarily for yield within the next three years, it is able to continue to access funding from the PWLB.
- 3.30 As of 6 April 2021, the 25 year PWLB certainty rate for annuity loans was 1.93% (2.44% as at 2 April 2020).
- 3.31 In line with the Council's Treasury Management advisor's advice, the Council will continue to consider borrowing rates offered by alternative lenders, including other Local Authorities, alongside PWLB rates in order to minimise, where possible, its costs of borrowing.

Budget Implications

- 3.32 A breakdown of the revenue budget showing interest and capital financing and the year end position based on the period April to March is included in **Appendix 6**. An overall underspend of £2,323k is reported towards the Council's net revenue outturn, mainly related to the re-phasing of capital spend. This is following the review of the capital programme in response to the Covid 2020/21 financial recovery plan, leading to lower than forecast borrowing costs and minimum revenue provision (MRP) requirement.

4 STATUTORY CONSIDERATIONS

- 4.1 This report is for information only.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The financial implications are contained within the body of the report.

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

6.2 The Council's lending & borrowing list is regularly reviewed during the financial year and credit ratings are monitored throughout the year. All lending/borrowing transactions are within approved limits and with approved institutions. Investment and Borrowing advice is provided by our Treasury Management consultants Arlingclose. As a result of the coronavirus pandemic, the frequency of updates and recommended actions from Arlingclose has increased, the Council has been acting on all recommendations in a timely manner.

6.3 The CIPFA Treasury Management in the Public Services: Code of Practice requires the Council nominate a committee to be responsible for ensuring effective scrutiny of the Treasury Management Strategy and policies. The Corporate Audit Committee carries out this scrutiny.

6.4 In addition, the Council maintain a risk register for Treasury Management activities, which is regularly reviewed and updated where applicable during the year.

7 CLIMATE CHANGE

7.1 The Council will continue to avoid any direct treasury management investments in fossil fuel related companies and will engage with its advisors to explore and assess the potential for any future investment opportunities in funds with a Renewable Energy & Sustainability focus as these products continue to be developed by the market in response to the Climate & Nature Emergency agenda.

7.2 An ESG section has been added to the Treasury Management Strategy document for the 2021/22 period and the treasury team will actively consider investment options permitted under the new guidelines.

7.3 The Council commissioned Arlingclose to undertake a review of possible ESG (Environmental, Social and Corporate Governance) funds the Council could invest in. The report has been received and due diligence is being undertaken into specific funds for potential investment during 2021/22.

8 OTHER OPTIONS CONSIDERED

8.1 None

9 CONSULTATION

9.1 Consultation has been carried out with the Cabinet Member for Economic Development & Resources, Section 151 Finance Officer and Monitoring Officer.

Contact person	<i>Gary Adams - 01225 47 7107; Jamie Whittard - 01225 47 7213 Gary_Adams@BATHNES.GOV.UK ; Jamie_Whittard@BATHNES.GOV.UK</i>
Background papers	<i>2020/21 Treasury Management & Investment Strategy</i>
Please contact the report author if you need to access this report in an alternative format	

APPENDIX 1

Performance against Treasury Management Indicators agreed in Treasury Management Strategy Statement

1. Authorised limit for external debt

These limits include current commitments and proposals in the budget report for capital expenditure, plus additional headroom over & above the operational limit for unusual cash movements.

	2020/21 Prudential Indicator	Actual as at 31st March 2021
	£'000	£'000
Borrowing	457,000	243,457
Other long term liabilities	4,000	0
Cumulative Total	461,000	243,457

2. Operational limit for external debt

The operational boundary for external debt is based on the same estimates as the authorised limit but without the additional headroom for unusual cash movements.

	2020/21 Prudential Indicator	Actual as at 31st March 2021
	£'000	£'000
Borrowing	427,000	243,457
Other long term liabilities	4,000	0
Cumulative Total	431,000	243,457

3. Upper limit for fixed interest rate exposure

This is the maximum amount of total borrowing which can be at fixed interest rate, less any investments for a period greater than 12 months which has a fixed interest rate.

	2020/21 Prudential Indicator	Actual as at 31st March 2021
	£'000	£'000
Fixed interest rate exposure	427,000	223,457*

* The £20m of LOBO's are quoted as variable rate in this analysis as the Lender has the option to change the rate at 6 monthly intervals (the Council has the option to repay the loan should the Lender exercise this option to increase the rate).

4. Upper limit for variable interest rate exposure

While fixed rate borrowing contributes significantly to reducing uncertainty surrounding interest rate changes, the pursuit of optimum performance levels may justify keeping flexibility through the use of variable interest rates. This is the maximum amount of total borrowing which can be at variable interest rates.

	2020/21 Prudential Indicator	Actual as at 31st March 2021
	£'000	£'000
Variable interest rate exposure	214,000	20,000

5. Upper limit for total principal sums invested for over 364 days

This is the maximum amount of total investments which can be over 364 days. The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments.

	2020/21 Prudential Indicator	Actual as at 31 st March 2021
	£'000	£'000
Investments over 364 days	50,000	5,000

6. Maturity Structure of borrowing

This indicator is set to control the Council's exposure to refinancing risk.

	Upper Limit	Lower Limit	Actual as at 31 st March 2021
	%	%	%
Under 12 months	50	Nil	16.4%
12 months and within 24 months	50	Nil	2.1%
24 months and within 5 years	75	Nil	0.0%
5 years and within 10 years	100	Nil	6.2%
10 years and above	100	Nil	75.4%

* The CIPFA Treasury management Code now requires the prudential indicator relating to Maturity of Fixed Rate Borrowing to reference the maturity of LOBO loans to the earliest date on which the lender can require payment, i.e. the next call date (which are at 6 monthly intervals for the £20m of LOBO's).

7. Average Credit Rating*

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the weighted average credit rating of its investment portfolio. A summary guide to credit ratings is set out at **Appendix 7**.

	2020/21 Prudential Indicator	Actual as at 31 st March 2021
	Rating	Rating
Minimum Portfolio Average Credit Rating	A-	AAA-

* The calculation excludes the strategic investment in the CCLA Local Authority's Property Fund which is unrated.

APPENDIX 2

The Council's Investment position at 31st March 2021

The term of investments is as follows:

Term Remaining	Balance at 31st March 2021
	£'000's
Notice (instant access funds)	47,500
Up to 1 month	5,000
1 month to 3 months	5,000
3 months to 6 months	0
6 months to 12 months	10,000
CCLA Property Fund (Strategic)	5,000
Total	72,500

The investment figure is made up as follows:

	Balance at 31st March 2021
	£'000's
B&NES Council	70,593
Schools	1,907
Total	72,500

The Council had a total average net positive balance of £82m during the period April 2020 to March 2021.

Chart 1: Council Investments as at 31st March 2021 - £72.5m

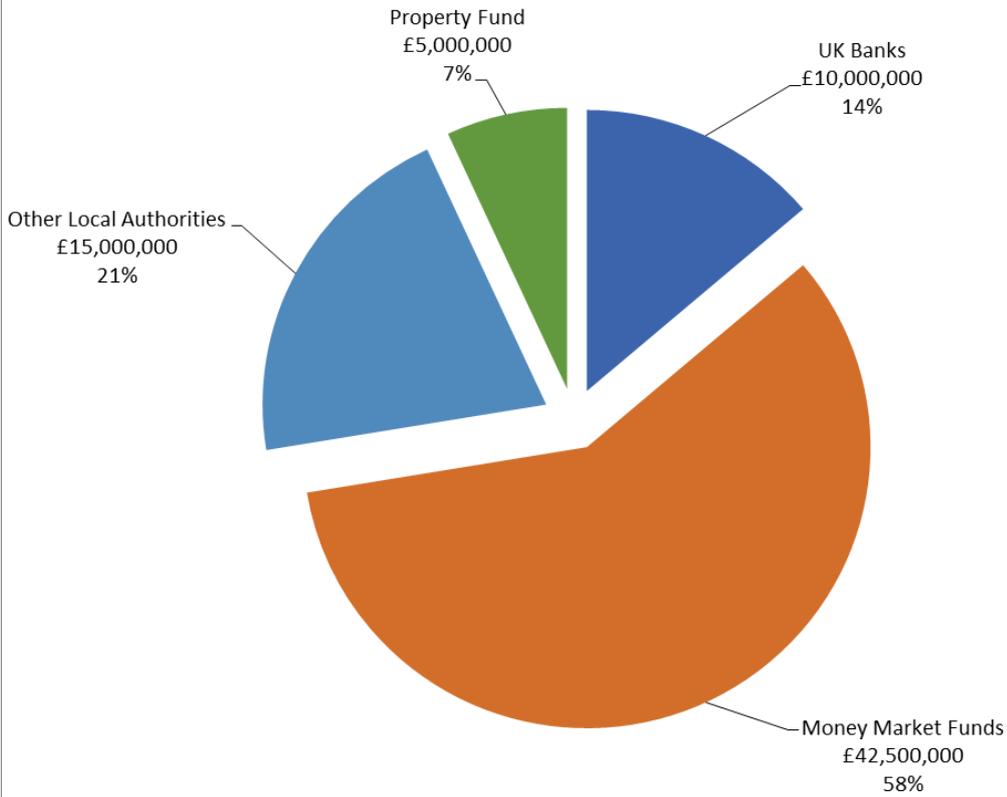


Chart 2: Council Investments as at 31st December 2020 - £81.5m

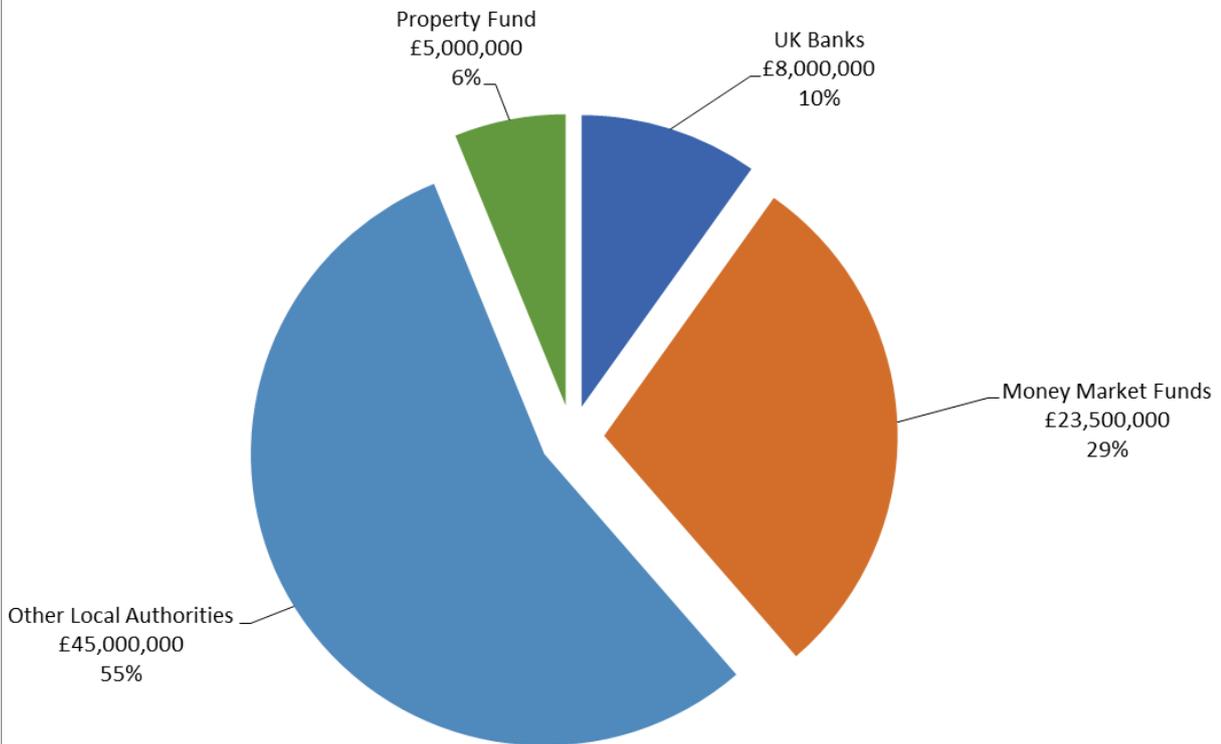


Chart 3: Council Investments Per Lowest Equivalent Long Term Credit Rating as at 31st March 2021 - £72.5m

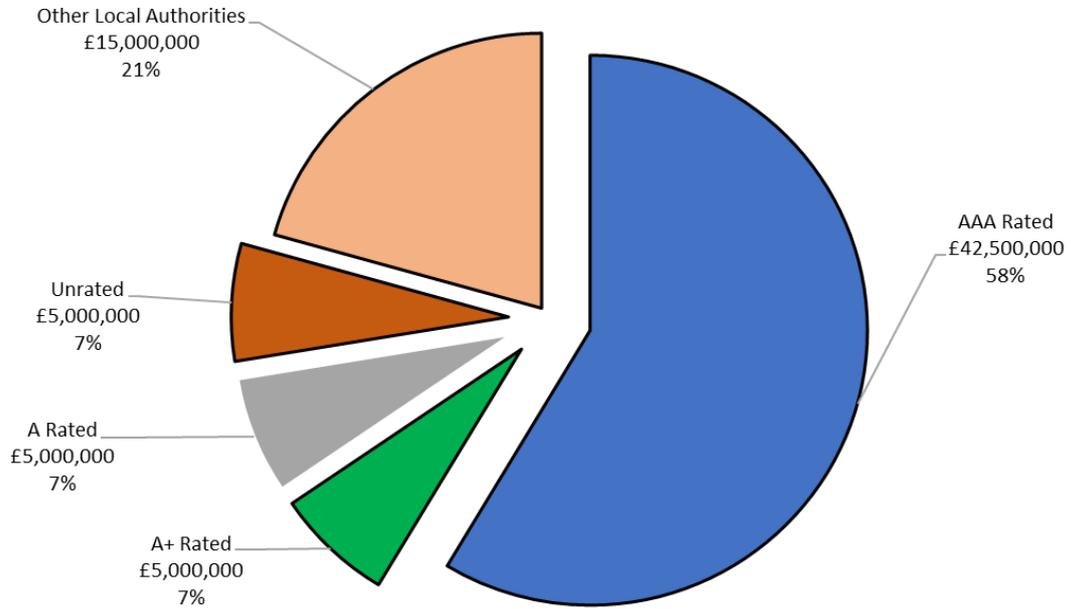
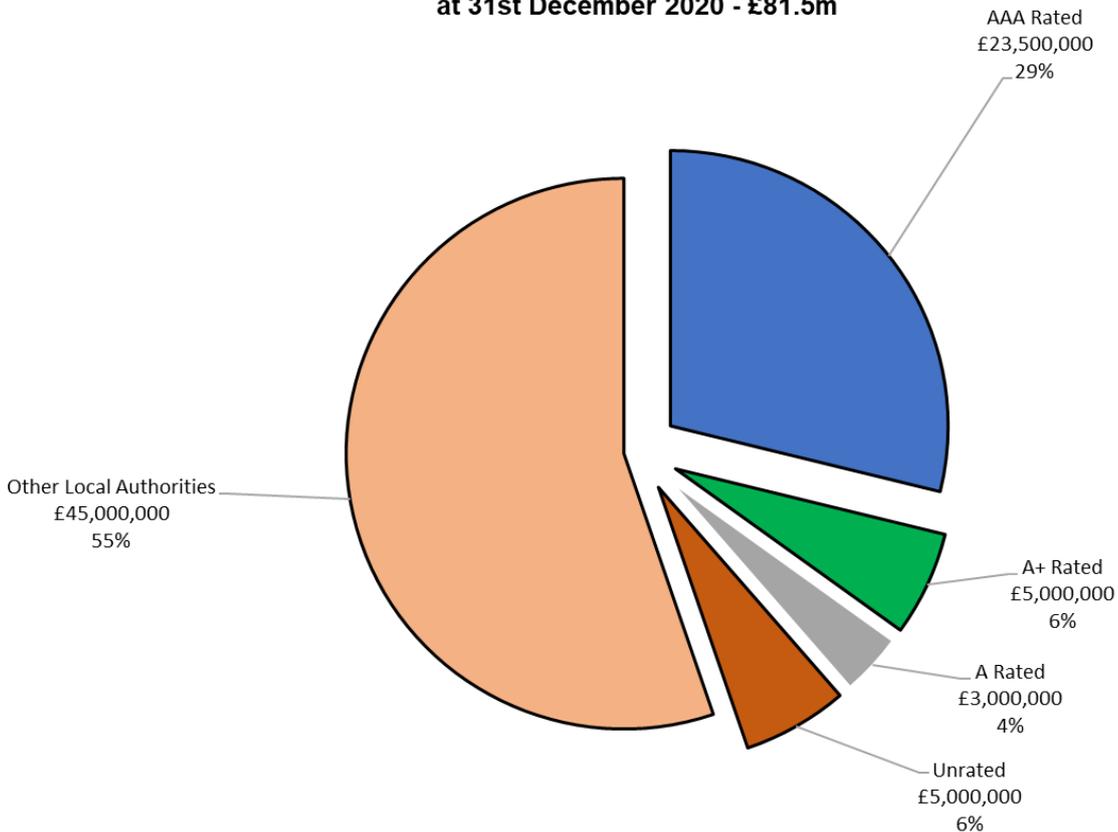


Chart 4: Council Investments Per Lowest Equivalent Long Term Credit Rating as at 31st December 2020 - £81.5m



APPENDIX 3

Average rate of return on investments for 2020/21

	Av return	Benchmark = Average 7 Day LIBID rate +0.05% (source: Arlingclose)	Performance against Benchmark %
April	0.46%	0.03%	+0.43%
May	0.60%	0.00%	+0.60%
June	0.58%	-0.02%	+0.60%
July	0.54%	-0.01%	+0.55%
August	0.51%	-0.02%	+0.52%
September	0.45%	-0.02%	+0.47%
October	0.36%	-0.03%	+0.39%
November	0.33%	-0.03%	+0.36%
December	0.32%	-0.04%	+0.36%
January	0.23%	-0.04%	+0.27%
February	0.28%	-0.04%	+0.32%
March	0.32%	-0.03%	+0.35%
Average	0.41%	-0.02%	+0.43%

APPENDIX 4
Council's External Borrowing at 31st March 2021

Lender	Amount outstanding	Start date	End date	Interest rate
Long term				
PWLB489142	10,000,000	15/10/2004	15/10/2034	4.75%
PWLB497233	5,000,000	12/05/2010	15/08/2035	4.55%
PWLB497234	5,000,000	12/05/2010	15/02/2060	4.53%
PWLB498834	5,000,000	05/08/2011	15/02/2031	4.86%
PWLB498835	10,000,000	05/08/2011	15/08/2029	4.80%
PWLB498836	15,000,000	05/08/2011	15/02/2061	4.96%
PWLB503684	5,300,000	29/01/2015	08/04/2034	2.62%
PWLB503685	5,000,000	29/01/2015	08/10/2064	2.92%
PWLB505122	17,208,385	20/06/2016	20/06/2041	2.36%
PWLB508126	9,244,638	06/12/2018	20/06/2043	2.38%
PWLB508202	9,746,453	12/12/2018	20/06/2068	2.59%
PWLB508224	4,616,238	13/12/2018	20/06/2043	2.25%
PWLB505744	8,573,560	24/02/2017	15/08/2039	2.28%
PWLB505966	8,752,361	04/04/2017	15/02/2042	2.26%
PWLB506052	7,438,286	08/05/2017	15/02/2042	2.25%
PWLB506255	6,751,779	10/08/2017	10/04/2067	2.64%
PWLB506729	9,084,826	13/12/2017	10/10/2042	2.35%
PWLB506995	9,103,440	06/03/2018	10/10/2042	2.52%
PWLB506996	9,313,693	06/03/2018	10/10/2047	2.62%
PWLB507749	9,248,353	10/09/2018	20/07/2043	2.42%
PWLB508485	19,581,457	11/02/2019	20/07/2068	2.52%
PWLB509840	9,493,281	04/09/2019	20/07/2044	1.40%
KBC Bank N.V *	5,000,000	08/10/2004	08/10/2054	4.50%
KBC Bank N.V *	5,000,000	08/10/2004	08/10/2054	4.50%
Commerzbank AG Frankfurt*	10,000,000	27/04/2005	27/04/2055	4.50%
Medium term				
Gloucestershire C.C.	5,000,000	25/11/2019	25/11/2021	1.50%
Portsmouth C.C.	5,000,000	19/12/2019	19/12/2022	1.65%
Short term				
London Borough of Bromley	15,000,000	01/04/2020	01/04/2021	1.50%
Total Borrowing	243,456,749			

*All LOBO's (Lender Option / Borrower Option) have reached the end of their fixed interest period and have reverted to the variable rate of 4.50%. The lender has the option to change the interest rate at 6 monthly intervals. Should the lender use the option to change the rate, then at this point the borrower has the option to repay the loan without penalty.

APPENDIX 5

Economic and market review for April to March 2021

Economic background:

The coronavirus pandemic dominated 2020/21, leading to almost the entire planet being in some form of lockdown during the year. The start of the financial year saw many central banks cutting interest rates as lockdowns caused economic activity to grind to a halt. The Bank of England cut Bank Rate to 0.1% and the UK government provided a range of fiscal stimulus measures, the size of which has not been seen in peacetime.

Some good news came in December 2020 as two COVID-19 vaccines were given approval by the UK Medicines and Healthcare products Regulatory Agency (MHRA). The UK vaccine rollout started in earnest; over 31 million people had received their first dose by 31st March.

A Brexit trade deal was agreed with only days to spare before the 11pm 31st December 2020 deadline having been agreed with the European Union on Christmas Eve. The Bank of England (BoE) held Bank Rate at 0.1% throughout the year but extended its Quantitative Easing programme by £150 billion to £895 billion at its November 2020 meeting. In its March 2021 interest rate announcement, the BoE noted that while GDP would remain low in the near-term due to COVID-19 lockdown restrictions, the easing of these measures means growth is expected to recover strongly later in the year. Inflation is forecast to increase in the near-term and while the economic outlook has improved there are downside risks to the forecast, including from unemployment which is still predicted to rise when the furlough scheme is eventually withdrawn.

Government initiatives supported the economy and the Chancellor announced in the 2021 Budget a further extension to the furlough (Coronavirus Job Retention) scheme until September 2021. Access to support grants was also widened, enabling more self-employed people to be eligible for government help. Since March 2020, the government schemes have helped protect more than 11 million jobs.

Despite the furlough scheme, unemployment still rose. Labour market data showed that in the three months to January 2021 the unemployment rate was 5.0%, in contrast to 3.9% recorded for the same period 12 months ago. Wages rose 4.8% for total pay in nominal terms (4.2% for regular pay) and was up 3.9% in real terms (3.4% for regular pay). Unemployment is still expected to increase once the various government job support schemes come to an end.

Inflation has remained low over the 12 month period. Latest figures showed the annual headline rate of UK Consumer Price Inflation (CPI) fell to 0.4% year/year in February, below expectations (0.8%) and still well below the Bank of England's 2% target. The ONS' preferred measure of CPIH which includes owner-occupied housing was 0.7% year/year (1.0% expected).

After contracting sharply in Q2 (Apr-Jun) 2020 by 19.8% q/q, growth in Q3 and Q4 bounced back by 15.5% and 1.3% respectively. The easing of some lockdown measures in the last quarter of the calendar year enabled construction output to continue, albeit at a much slower pace than the 41.7% rise in the prior quarter. When released, figures for Q1 (Jan-Mar) 2021 are expected to show a decline given the national lockdown.

After collapsing at an annualised rate of 31.4% in Q2, the US economy rebounded by 33.4% in Q3 and then a further 4.1% in Q4. The US recovery has been fuelled by three major pandemic relief stimulus packages totalling over \$5 trillion. The Federal Reserve cut its main interest rate to between 0% and 0.25% in March 2020 in response to the pandemic and it has remained at the same level since. Joe Biden became the 46th US president after defeating Donald Trump.

The European Central Bank maintained its base rate at 0% and deposit rate at -0.5% but in December 2020 increased the size of its asset purchase scheme to €1.85 trillion and extended it until March 2022.

Financial markets: Monetary and fiscal stimulus helped provide support for equity markets which rose over the period, with the Dow Jones beating its pre-crisis peak on the back of outperformance by a small number of technology stocks. The FTSE indices performed reasonably well during the period April to November, before being buoyed in December by both the vaccine approval and Brexit deal, which helped give a boost to both the more internationally focused FTSE 100 and the more UK-focused FTSE 250, however they remain lower than their pre-pandemic levels.

Ultra-low interest rates prevailed throughout most of the period, with yields generally falling between April and December 2020. From early in 2021 the improved economic outlook due to the new various stimulus packages (particularly in the US), together with the approval and successful rollout of vaccines, caused government bonds to sell off sharply on the back of expected higher inflation and increased uncertainty, pushing yields higher more quickly than had been anticipated.

The 5-year UK benchmark gilt yield began the financial year at 0.18% before declining to -0.03% at the end of 2020 and then rising strongly to 0.39% by the end of the financial year. Over the same period the 10-year gilt yield fell from 0.31% to 0.19% before rising to 0.84%. The 20-year declined slightly from 0.70% to 0.68% before increasing to 1.36%. 1-month, 3-month and 12-month SONIA bid rates averaged 0.01%, 0.10% and 0.23% respectively over the financial year.

The yield on 2-year US treasuries was 0.16% at the end of the period, up from 0.12% at the beginning of January but down from 0.21% at the start of the financial year. For 10-year treasuries the end of period yield was 1.75%, up from both the beginning of 2021 (0.91%) and the start of the financial year (0.58%).

German bund yields continue to remain negative across most maturities.

Credit review: After spiking in March 2020, credit default swap spreads declined over the remaining period of the year to broadly pre-pandemic levels. The gap in spreads between UK ringfenced and non-ringfenced entities remained, albeit Santander UK is still an outlier compared to the other ringfenced/retail banks. At the end of the period Santander UK was trading the highest at 57bps and Standard Chartered the lowest at 32bps. The other ringfenced banks were trading around 33 and 34bps while Nationwide Building Society was 43bps.

Credit rating actions to the period ending September 2020 have been covered in previous outturn reports. Subsequent credit developments include Moody's downgrading the UK sovereign rating to Aa3 with a stable outlook which then impacted a number of other UK institutions, banks and local government. In the last quarter of the financial year S&P upgraded Clydesdale Bank to A- and revised Barclay's outlook to stable (from negative)

while Moody's downgraded HSBC's Baseline Credit Assessment to baa3 whilst affirming the long-term rating at A1.

The vaccine approval and subsequent rollout programme are both credit positive for the financial services sector in general, but there remains much uncertainty around the extent of the losses banks and building societies will suffer due to the economic slowdown which has resulted due to pandemic-related lockdowns and restrictions. The institutions and durations on the Authority's counterparty list recommended by treasury management advisors Arlingclose remain under constant review, but at the end of the period no changes had been made to the names on the list or the recommended maximum duration of 35 days.

APPENDIX 6

Interest & Capital Financing Costs – Budget Monitoring 2020/21 Outturn

April 2020 to March 2021	YEAR END POSITION			ADV/FAV
	Budgeted Spend or (Income) £'000	Actual Spend or (Income) £'000	Actual over or (under) spend £'000	
Interest & Capital Financing				
- Debt Costs	8,789	7,433	(1,355)	FAV
- Internal Repayment of Loan Charges	(9,001)	(9,501)	(500)	FAV
- Ex Avon Debt Costs	1,060	1,027	(34)	FAV
- Minimum Revenue Provision (MRP)	7,296	6,894	(402)	FAV
- Interest on Balances	(466)	(498)	(32)	FAV
Total	7,678	5,355	(2,323)	FAV

APPENDIX 7

Summary Guide to Credit Ratings

Rating	Details
AAA	Highest credit quality – lowest expectation of default, which is unlikely to be adversely affected by foreseeable events.
AA	Very high credit quality - expectation of very low default risk, which is not likely to be significantly vulnerable to foreseeable events.
A	High credit quality - expectations of low default risk which may be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
BBB	Good credit quality - expectations of default risk are currently low but adverse business or economic conditions are more likely to impair this capacity.
BB	Speculative - indicates an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time.
B	Highly speculative - indicates that material default risk is present, but a limited margin of safety remains. Capacity for continued payment is vulnerable to deterioration in the business and economic environment.
CCC	Substantial credit risk - default is a real possibility.
CC	Very high levels of credit risk - default of some kind appears probable.
C	Exceptionally high levels of credit risk - default is imminent or inevitable.
RD	Restricted default - indicates an issuer that has experienced payment default on a bond, loan or other material financial obligation but which has not entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, and which has not otherwise ceased operating.
D	Default - indicates an issuer that has entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, or which has otherwise ceased business.

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Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING DATE:	20th July 2021	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3297
TITLE:	Treasury Management Performance Report to 30th June 2021	
WARD:	All	
AN OPEN PUBLIC ITEM		
<p>List of attachments to this report:</p> <p>Appendix 1 – Performance Against Prudential Indicators Appendix 2 – The Council’s Investment Position at 30th June 2021 Appendix 3 – Average monthly rate of return for 1st 3 months of 2021/22 Appendix 4 – The Council’s External Borrowing Position at 30th June 2021 Appendix 5 – Arlingclose’s Economic & Market Review Q1 of 2021/22 Appendix 6 – Interest & Capital Financing Budget Monitoring 2021/22 Appendix 7 – Summary Guide to Credit Ratings</p>		

1 THE ISSUE

- 1.1 Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy’s Treasury Management in the Public Services: Code of Practice 2017 Edition (the CIPFA Code), which requires the Council to approve a Treasury Management Strategy before the start of each financial year, review performance during the year, and approve an annual report after the end of each financial year.
- 1.2 This report gives details of performance against the Council’s Treasury Management Strategy for 2021/22 for the first three months of 2021/22.

2 RECOMMENDATION

The Cabinet agrees that;

- 2.1 The Treasury Management Report to 30th June 2021, prepared in accordance with the CIPFA Treasury Code of Practice, is noted.
- 2.2 The Treasury Management Indicators to 30th June 2021 are noted.

3 THE REPORT

Summary

- 3.1 The average rate of investment return for the first three months of 2021/22 is 0.30%, which is 0.33% above the benchmark rate which is currently -0.03%.
- 3.2 The Council's Prudential Indicators for 2021/22 were agreed by Council in February 2021 and performance against the key indicators is shown in **Appendix 1**. All indicators are within target levels.

Summary of Returns

- 3.3 The Council's investment position as at 30th June 2021 is given in **Appendix 2**. The balance of deposits as at 30th June 2021, compared to those as at 31st March 2021, are also set out in the pie charts in this appendix.
- 3.4 Gross interest earned on investments totalled £56k. **Appendix 3** details the investment performance, showing the average rate of interest earned over this period was 0.30%, which was 0.33% above the benchmark rate of average 7 day LIBID +0.05% (-0.03%). This excess is mainly due to the £5m investment held in the CCLA Local Authority Property Fund, which is a long term strategic investment earning a higher rate of interest (estimated 3.7% for 2021/22 Q1).

Summary of Borrowings

- 3.5 The Council's external borrowing as at 30th June 2021 totalled £227.4 million and is detailed in **Appendix 4**. On 1st April 2021, the Council repaid £15.0 million of short term borrowing from a local authority, which had been borrowed last year for general cashflow requirements and to lower liquidity risks arising from uncertainties surrounding the Covid-19 pandemic.
- 3.6 The Council's Capital Financing Requirement (CFR) as at 31st March 2021 was £326.9 million. This represents the Council's underlying need to borrow to finance capital expenditure, and demonstrates that the borrowing taken to date relates to funding historical capital spend.
- 3.7 The CFR represents the underlying need to borrow, and the difference between that and the current borrowing of £227.4 million represents re-investment of the internal balances including reserves, reducing the in-year borrowing costs in excess of the potential investment returns.
- 3.8 Following Local Government Reorganisation in 1996, Avon County Council's residual debt is administered by Bristol City Council. All successor Unitary Authorities make an annual contribution to principal and interest repayment, for which there is a provision in the Council's revenue budget. The amount of residual debt outstanding as at 31st March 2021 apportioned to Bath & North East Somerset Council is £10.9m. Since this borrowing is managed by an external body and treated in the Council's Statement of Accounts as a deferred liability, it is not included in the borrowing figures referred to in paragraph 3.5.
- 3.9 The borrowing portfolio as at 30th June 2021 is shown in **Appendix 4**.

Strategic & Tactical Decisions

- 3.10 As shown in the charts in **Appendix 2**, the investment portfolio of £71.9 million as at 30th June 2021 is diversified across Money Market Funds, Local Authorities, the Government's Debt Mgt Account Deposit Facility, the CCLA Property Fund and in highly rated UK Banks. The Council uses AAA rated Money Market funds to maintain very short term liquidity.
- 3.11 The Council does not hold any direct investments with banks in countries within the Eurozone reflecting both on the underlying debt issues in some Eurozone countries and the low levels of interest rates.
- 3.12 The Council's investment portfolio as at 30th June 2021 includes a total of £5m invested longer term in the CCLA Local Authorities Property Fund.
- 3.13 The Council has reviewed its current investment holdings with its Treasury Management advisors to assess whether any of the investments placed are directly related to companies involved in fossil fuel activities. It was confirmed that the Council does not currently invest directly in equities or certificates of deposits that were not issued by banks or building societies and does not have any direct investments in fossil fuel companies.
- 3.14 The Council commissioned Arlingclose to undertake a review of possible ESG (Environmental, Social and Corporate Governance) funds into which the Council could invest surplus treasury assets. The report has been received and due diligence is being undertaken into specific funds for potential investment during 2021/22. The potential for making future ESG focussed investments is included in the 2021/22 Treasury Management Strategy, approved by Council in February 2021.
- 3.15 The Council's average investment return for short-term investments is currently 0.06%, slightly above the budgeted level of 0.05%. The return on the £5m long-term strategic investment in the CCLA Local Authority Property Fund is estimated to be 3.7%, which is also slightly above the budgeted rate of 3.5%. This gives an average combined return of 0.30% for all investments.

Future Strategic & Tactical Issues

- 3.16 The Council's Treasury Management advisor's economic and market review for the first quarter of 2021/22 is included in **Appendix 5**.
- 3.17 The benefits of the Council's current policy of internal borrowing are monitored regularly against the likelihood that long term borrowing rates are forecast to rise in future years. The focus remains on the rate of increase and the medium-term peak.
- 3.18 Any additional borrowing to take place in 2021/22 will therefore be balanced between a need to maintain an appropriate working cash balance and taking advantage of favourable movements in long term borrowing rates.

Borrowing update

- 3.19 Due to the high cash balances held by the Council at the end of 2020/21, a decision was made to repay the £15m one-year loan taken at the start of 2020/21

from the London Borough of Bromley upon its 1st April 2021 maturity date. No further borrowing has been taken during the first quarter.

- 3.20 The Council is seeking advice from its treasury advisors on the potential option to make an early repayment of a £10m LOBO loan during 2021/22 as part of a debt rescheduling approach. This provides potential to make revenue savings and reduce risk by replacing the LOBO debt with a PWLB loan at a lower interest rate with the replacement loan duration more aligned to the Council's future borrowing profile. A financial appraisal is being undertaken into the restructuring options and the decision whether to proceed will be taken by the S151 Officer in line with the approved Treasury Management Strategy.

Budget Implications

- 3.21 A breakdown of the revenue budget showing interest and capital financing and the forecast year end position based on the period April to June 2021 is included in **Appendix 6**. At this early stage of the financial year, this is currently forecast to be on budget.

4 STATUTORY CONSIDERATIONS

- 4.1 This report is for information only.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The financial implications are contained within the body of the report.

6 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.
- 6.2 The Council's lending & borrowing list is regularly reviewed during the financial year and credit ratings are monitored throughout the year. All lending/borrowing transactions are within approved limits and with approved institutions. Investment and borrowing advice is provided by our Treasury Management consultants, Arlingclose.
- 6.3 The CIPFA Treasury Management in the Public Services: Code of Practice requires the Council nominate a committee to be responsible for ensuring effective scrutiny of the Treasury Management Strategy and policies. The Corporate Audit Committee carries out this scrutiny.
- 6.4 In addition, the Council maintain a risk register for Treasury Management activities, which is regularly reviewed and updated where applicable during the year.

7 CLIMATE CHANGE

- 7.1 The Council will continue to avoid any direct treasury management investments in fossil fuel related companies and will engage with its advisors to explore and assess

the potential for any future investment opportunities in funds with a Renewable Energy & Sustainability focus as these products continue to be developed by the market in response to the Climate & Nature Emergency agenda.

7.2 An ESG section has been added to the Treasury Management Strategy document for the 2021/22 period and the treasury team will actively consider investment options permitted under the new guidelines.

7.3 The Council commissioned Arlingclose to undertake a review of possible ESG (Environmental, Social and Corporate Governance) funds the Council could invest in. The report has been received and due diligence is being undertaken into specific funds for potential investment during 2021/22.

8 OTHER OPTIONS CONSIDERED

8.1 None

9 CONSULTATION

9.1 Consultation has been carried out with the Cabinet Member for Economic Development & Resources, Section 151 Finance Officer and Monitoring Officer.

Contact person	<i>Gary Adams - 01225 477107; Gary_Adams@BATHNES.GOV.UK</i> <i>Jamie Whittard - 01225 477213; Jamie_Whittard@BATHNES.GOV.UK</i>
Background papers	<i>2021/22 Treasury Management & Investment Strategy</i>
Please contact the report author if you need to access this report in an alternative format	

APPENDIX 1

Performance against Treasury Management Indicators agreed in Treasury Management Strategy Statement

1. Treasury Borrowing limits

These limits include current commitments and proposals in the budget report for capital expenditure, plus additional headroom over & above the operational limit for unusual cash movements.

The Authorised limits for external debt include current commitments and proposals in the budget report for capital expenditure, plus additional headroom over and above the operational limit for unusual cash movements.

The Operational boundary for external debt is based on the same estimates as the authorised limit but without the additional headroom for unusual cash movements. This level also factors in the proposed approach to use internal cash-flow and future capital receipts as the preferred financing method for the capital programme.

	2021/22 Prudential Indicator	Actual as at 30 th June 2021
Operational boundary – borrowing	£408m	£227.4m
Operational boundary – other long-term liabilities	£4m	£0m
Operational boundary – TOTAL	£412m	£227.4m
Authorised limit – borrowing	£438m	£227.4m
Authorised limit – other long-term liabilities	£4m	£0m
Authorised limit – TOTAL	£442m	£227.4m

2. Average Credit Rating*

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the weighted average credit rating of its investment portfolio. A summary guide to credit ratings is set out at **Appendix 7**.

	2021/22 Prudential Indicator	Actual as at 30 th June 2021
	Rating	Rating
Minimum Portfolio Average Credit Rating	A-	AAA-

* The calculation excludes the strategic investment in the CCLA Local Authority's Property Fund which is unrated.

3. Liquidity

The Authority has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Liquidity risk indicator	2021/22 Prudential Indicator	Minimum During Quarter	Date of minimum
Minimum liquid cash balance in period	£15m	£36.8m	30 th April

4. Interest rate exposures

This indicator is set to control the Council's exposure to interest rate risk. The upper limits on fixed and variable rate interest rate exposures, expressed as an amount of net principal borrowed.

	2021/22 Prudential Indicator	Actual as at 30 th June 2021
Upper limit on fixed interest rate exposures	£408m	£207.4m
Upper limit on variable interest rate exposures	£184m	£20m

Fixed rate investments and borrowings are those where the rate of interest is fixed for at least 12 months, measured from the start of the financial year or the transaction date if later. All other instruments are classed as variable rate.

The Fixed rate limit is the total borrowing which can be at fixed interest rate, less any investments for a period greater than 12 months which has a fixed interest rate.

The Variable rate limit is the maximum amount of total borrowing which can be at variable interest rates.

5. Maturity Structure of borrowing

This indicator is set to control the Council's exposure to refinancing risk.

	Upper Limit	Lower Limit	Actual as at 30 th June 2021
	%	%	%
Under 12 months	50	Nil	11.0
12 months and within 24 months	50	Nil	2.2
24 months and within 5 years	75	Nil	0
5 years and within 10 years	75	Nil	6.6
10 years and within 25 years	100	25	49.3
Over 25 years	100		30.9

* The CIPFA Treasury management Code now requires the prudential indicator relating to Maturity of Fixed Rate Borrowing to reference the maturity of LOBO loans to the earliest date on which the lender can require payment, i.e. the next call date (which are at 6 monthly intervals for the £20m of LOBO's). However, the Council would only consider repaying these loans if the Lenders exercised their options to alter the interest rate.

6. Upper limit for total principal sums invested for over 364 days

The purpose of this indicator is to control the Authority's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Price risk indicator	2021/22 Prudential Indicator	Actual as at 30 th June 2021
Limit on principal invested beyond 31 st March 2022	£50m	£5m*
Limit on principal invested beyond 31 st March 2023	£20m	£5m*
Limit on principal invested beyond 31 st March 2024	£10m	£5m*

*The Council includes the CCLA LA Property Fund against this indicator as it is held as a Long Term Strategic Investment.

APPENDIX 2

The Council's Investment position at 30th June 2021

The term of investments is as follows:

Term Remaining	Balance at 30th June 2021
	£m
Notice (instant access funds)	36.9
Up to 1 month	10.0
1 month to 3 months	5.0
3 months to 6 months	15.0
CCLA Property Fund (Strategic)	5.0
Total	71.9

The investment figure is made up as follows:

	Balance at 30th June 2021
	£m
B&NES Council	69.2
Schools	2.7
Total	71.9

The Council had a total average net positive balance of £76m during the period April 2021 to June 2021.

Chart 1: Council Investments as at 30th June 2021 - £71.9m

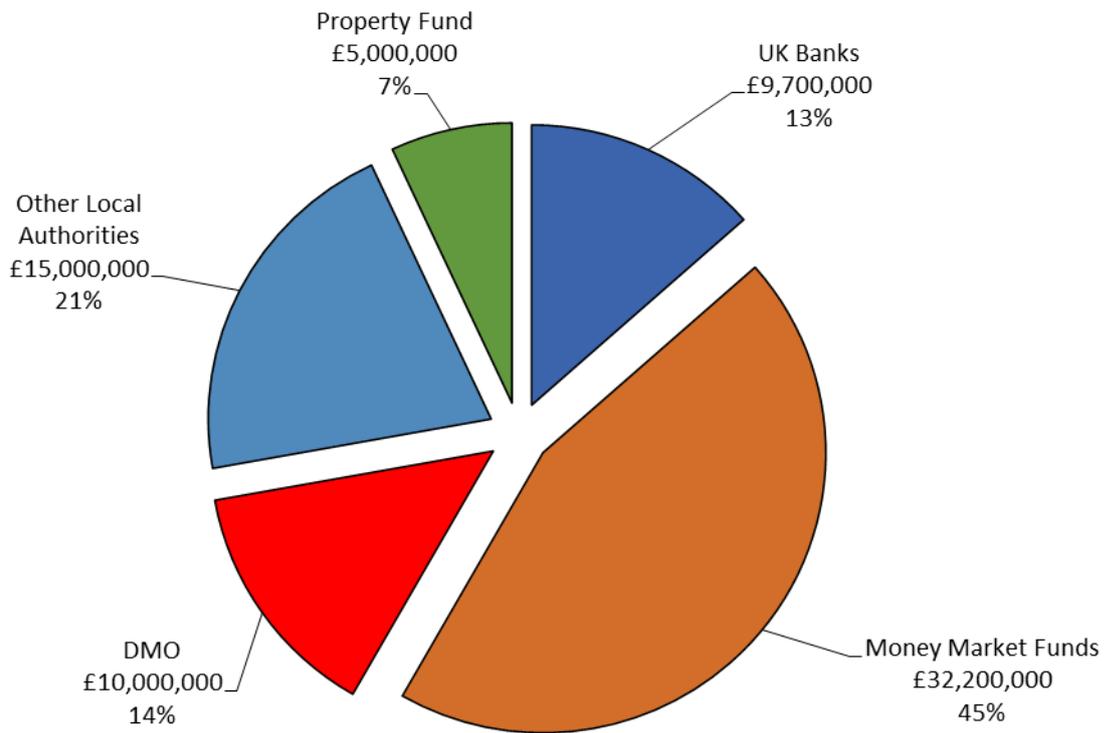


Chart 2: Council Investments as at 31st March 2021 - £72.5m

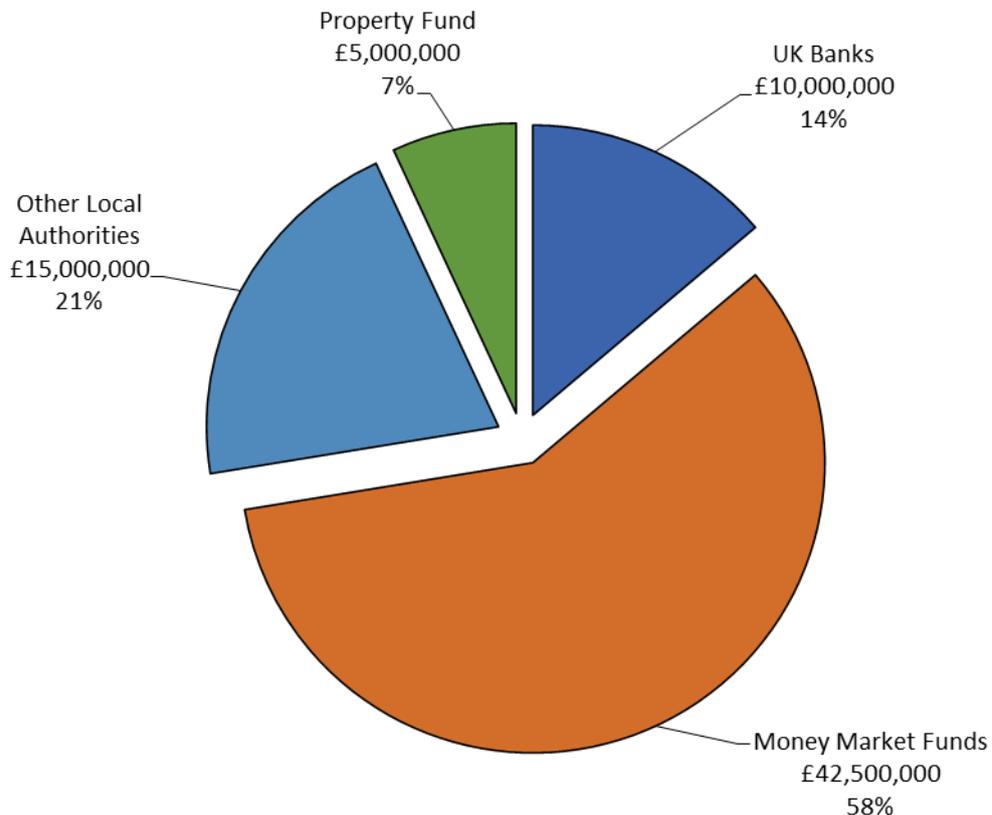


Chart 3: Council Investments Per Lowest Equivalent Long Term Credit Rating as at 30th June 2021 - £71.9m

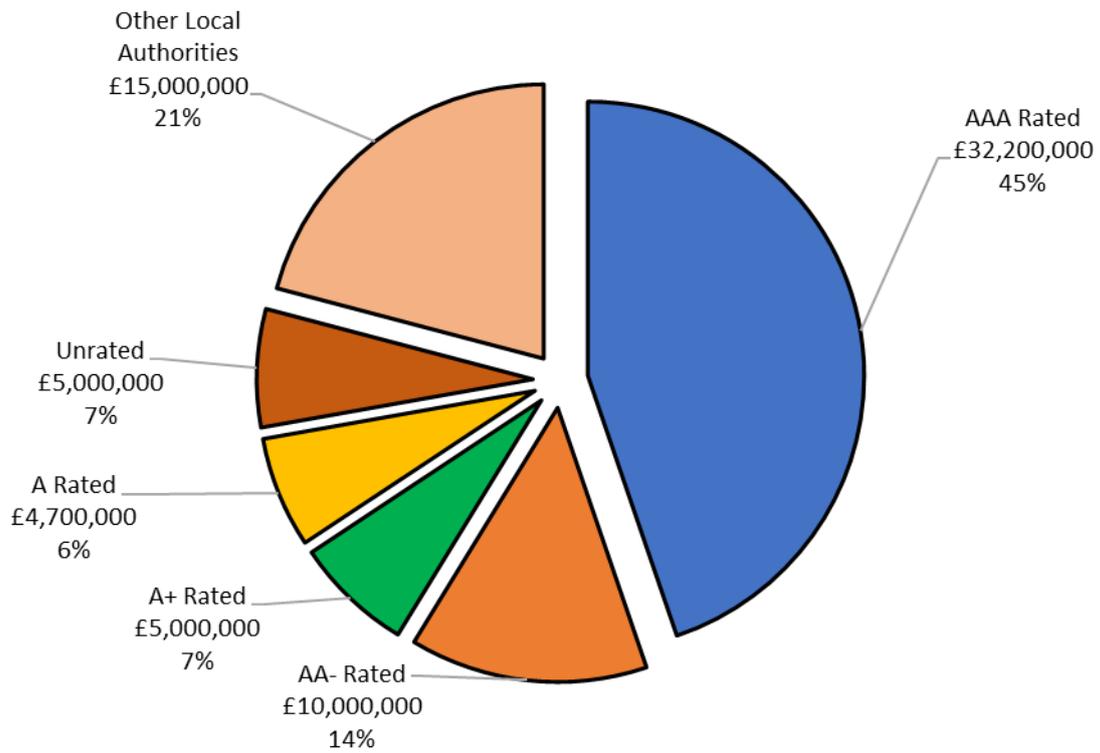
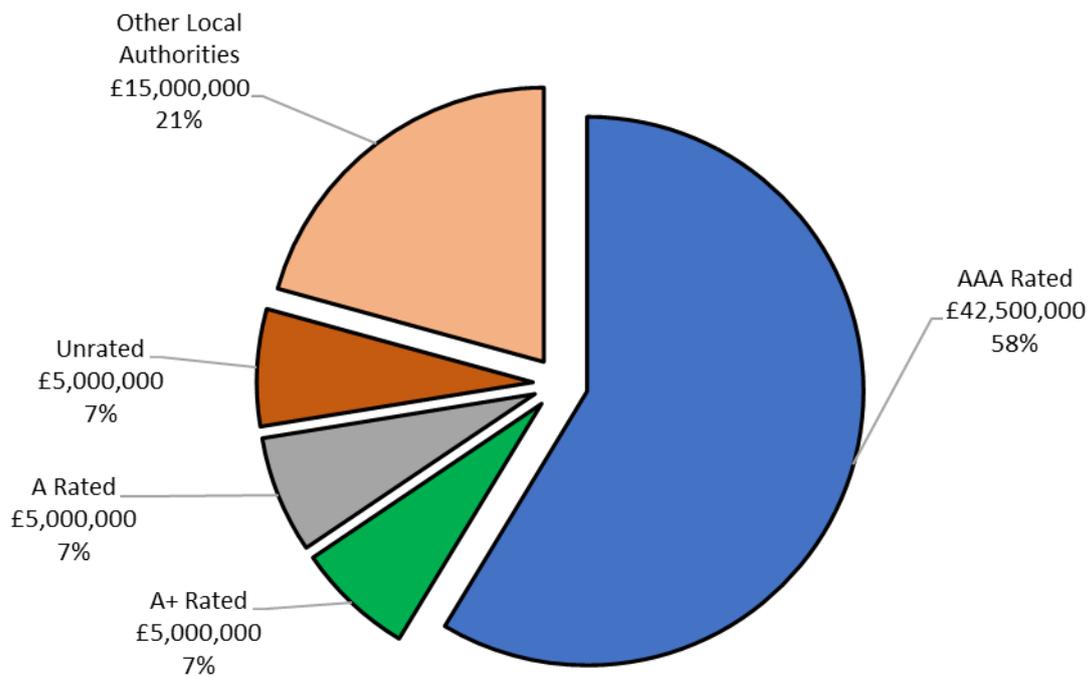


Chart 4: Council Investments Per Lowest Equivalent Long Term Credit Rating as at 31st March 2021 - £72.5m



APPENDIX 3

Average rate of return on investments for 2021/22

	Apr. %	May %	Jun. %	Average
Average rate of interest earned	0.30%	0.32%	0.28%	0.30%
Benchmark = Average 7 Day LIBID rate +0.05% (source: Arlingclose)	-0.03%	-0.03%	-0.03%	-0.03%
Performance against Benchmark %	+0.33%	+0.35%	+0.31%	+0.33%

APPENDIX 4

Council's External Borrowing at 30th June 2021

Lender	Amount outstanding	Start date	End date	Interest rate
Long term				
PWLB489142	10,000,000	15/10/2004	15/10/2034	4.75%
PWLB497233	5,000,000	12/05/2010	15/08/2035	4.55%
PWLB497234	5,000,000	12/05/2010	15/02/2060	4.53%
PWLB498834	5,000,000	05/08/2011	15/02/2031	4.86%
PWLB498835	10,000,000	05/08/2011	15/08/2029	4.80%
PWLB498836	15,000,000	05/08/2011	15/02/2061	4.96%
PWLB503684	5,300,000	29/01/2015	08/04/2034	2.62%
PWLB503685	5,000,000	29/01/2015	08/10/2064	2.92%
PWLB505122	16,879,619	20/06/2016	20/06/2041	2.36%
PWLB508126	9,088,130	06/12/2018	20/06/2043	2.38%
PWLB508202	9,693,756	12/12/2018	20/06/2068	2.59%
PWLB508224	4,536,875	13/12/2018	20/06/2043	2.25%
PWLB505744	8,573,560	24/02/2017	15/08/2039	2.28%
PWLB505966	8,752,361	04/04/2017	15/02/2042	2.26%
PWLB506052	7,438,286	08/05/2017	15/02/2042	2.25%
PWLB506255	6,714,422	10/08/2017	10/04/2067	2.64%
PWLB506729	8,925,963	13/12/2017	10/10/2042	2.35%
PWLB506995	8,947,355	06/03/2018	10/10/2042	2.52%
PWLB506996	9,194,007	06/03/2018	10/10/2047	2.62%
PWLB507749	9,248,353	10/09/2018	20/07/2043	2.42%
PWLB508485	19,581,457	11/02/2019	20/07/2068	2.52%
PWLB509840	9,493,281	04/09/2019	20/07/2044	1.40%
KBC Bank N.V *	5,000,000	08/10/2004	08/10/2054	4.50%
KBC Bank N.V *	5,000,000	08/10/2004	08/10/2054	4.50%
Commerzbank AG Frankfurt*	10,000,000	27/04/2005	27/04/2055	4.50%
Medium term				
Portsmouth C.C.	5,000,000	19/12/2019	19/12/2022	1.65%
Short term				
Gloucestershire C.C.	5,000,000	25/11/2019	25/11/2021	1.50%
Total Borrowing	227,367,425			

*All LOBO's (Lender Option / Borrower Option) have reached the end of their fixed interest period and have reverted to the variable rate of 4.50%. The lender has the option to change the interest rate at 6 monthly intervals. Should the lender use the option to change the rate, then at this point the borrower has the option to repay the loan without penalty.

APPENDIX 5

Economic and market review for April 2021 to June 2021

Economic background: Economic resurgence from coronavirus pandemic continued to dominate the first quarter of the financial year. In the biggest inoculation programme the country has ever undertaken, over 44 million people in the UK had received their first dose of a COVID-19 vaccine with 32 million also having a second dose.

The Bank of England (BoE) held Bank Rate at 0.1% throughout the period and maintained its Quantitative Easing programme at £895 billion, unchanged since the November 2020 meeting. In its June 2021 policy announcement, the BoE expected the economy to experience a temporary period of strong GDP growth and above-target CPI inflation, after which growth and inflation is expected to fall back. There were, however, two-sided risks around this central path, and it is possible that near-term upward pressure on prices could prove somewhat larger than expected. The Bank's Monetary Policy Committee does not intend to tighten monetary policy at least until there is clear evidence that significant progress is being made in eliminating spare capacity and achieving the 2% inflation target sustainably.

Government initiatives continued to support the economy over the quarter, following the range of measures announced by the Chancellor in the 2021 Budget, which included extending the furlough (Coronavirus Job Retention) scheme until September 2021.

The latest labour market data showed that in the three months to April 2021 the unemployment rate fell to 4.7%, although it is likely that labour market slack has remained higher than implied by this measure. Some individuals stopped looking for work during the pandemic and were therefore recorded as inactive. There is uncertainty around how many of these individuals will resume their search for a job, and when. Latest data showed growth in average total pay (including bonuses) and regular pay (excluding bonuses) among employees was 5.6% for the three months February to April 2021. The seemingly high growth partly reflected a base effect from a decline in average pay in the spring of last year, associated with the reduced pay of employees on the furlough scheme.

Annual CPI inflation rose to 2.1% in May on the back of base effects in spring 2020 and partly due to higher energy and commodity prices and supply-side bottlenecks. The BoE expects inflation to exceed 3% for a temporary period. The ONS' preferred measure of CPIH which includes owner-occupied housing was also 2.1% year/year, marginally higher than expectations.

The reimposition of restrictions on activity in the first quarter of calendar 2021 year resulted in GDP falling 1.5% in Q1. GDP growth was strong in April at 2.3% with the partial easing of restrictions on non-essential retail and outdoor hospitality. Housing market activity remained strong, aided by the extension of the stamp duty threshold and an increase in mortgage approvals for house purchases.

The US economy rebounded by 4.3% in Q4 2020 (Oct-Dec) and then an even stronger 6.4% in Q1 as the recovery continued to be fuelled by \$5 trillion worth of pandemic stimulus packages. The Federal Reserve maintained its main interest rate at between 0% and 0.25% over the period.

The European Central Bank maintained its base rate at 0%, deposit rate at -0.5%, and asset purchase scheme at €1.85 trillion.

Financial markets: Ongoing monetary and fiscal stimulus together with improving economic growth prospects and successful vaccine rollout programmes continued to boost equity markets over the period. The Dow Jones reached a record high during the period while the FTSE 100 index had almost recouped 2020 losses and the more UK-focused FTSE 250 was back above pre-pandemic levels.

Inflation worries continued during the period but declines in bond yields between April and June suggest bond markets may be expecting any general price increases to be less severe, or more transitory, than was previously thought.

The 5-year UK benchmark gilt yield began the financial year at 0.36% before declining to 0.29% by mid-June 2021 and then rising to 0.34%. Over the same period the 10-year gilt yield fell from 0.79% to 0.71% before rising to 0.84% and is currently 0.73%. The 20-year yield declined from 1.31% to 1.21%. [yields at 28/6/21]

1-month, 3-month and 12-month SONIA bid rates averaged 0.03%, 0.01% and 0.15% respectively over the period.

Credit review: Credit default swap spreads were relatively flat over the period and remain only slightly above their pre-pandemic levels. The gap in spreads between UK ringfenced and non-ringfenced entities remained, and Santander UK remains an outlier compared to the other ringfenced/retail banks. At mid-June, Santander UK was trading the highest at 56bps and Standard Chartered the lowest at 32bps. The other ringfenced banks were trading between 34 and 36bps while Nationwide Building Society was 40bps.

There were only a small number of credit rating actions over the period. Fitch revised a number of Singaporean and Australian banks as well as Close Brothers to stable, and also upgraded Coventry Building Society to 'A' (from 'A-'). S&P followed closely behind revising some Australian banks to stable, as well as Transport for London, which a week or so later received a £1.08 billion bailout from the UK government. S&P also downgraded the long- and short-term ratings of DZ Bank (Germany) to A+ and A-1 from AA- and A-1+ respectively.

The successful vaccine rollout programme is both credit positive for the financial services sector in general, but there remains much uncertainty around the extent of the losses banks and building societies will suffer due to the economic slowdown which has resulted due to pandemic-related lockdowns and restrictions. The institutions and durations on the Authority's counterparty list recommended by treasury management advisors Arlingclose remain under constant review, but at the end of the period no changes had been made to the names on the list or the recommended maximum duration of 35 days.

Outlook for the remainder of 2021/22

The medium-term global economic outlook has continued to improve with the rollout of vaccination programmes. The UK has continued to benefit from its initial rapid vaccine rollout and has shifted focus onto second vaccinations to increase protection to counter a third wave of Covid variant.

The opening up of the UK economy in Q2/Q3 will continue to prompt a sharp increase in GDP.

While downside risks seem to have fallen somewhat after recent trends in GDP and labour, the upside risks remain relatively balanced with the MPC reiterating its commitment not to tighten policy until there is clear evidence that the recovery is eliminating spare capacity in the economy.

Inflation has moved above the Bank of England's 2% target. Alongside the increase in commodity prices, the MPC has acknowledged the prospect of a sharper upturn in inflation, with the potential CPI could rise above 3% in the coming months. However, the nature of the commodity price rise and the base effect easing, this is likely a more transitory effect.

Upward pressure on gilt yields could continue in the short term due to the preponderance of strong data, but this is likely to ease once inflation fears recede as the effect of weak base effects subsides and growth figures return to more normal levels.

Arlingclose expects Bank Rate to remain at the current 0.10% level. The risk of movement in Bank Rate in the short term is low.

Gilt yields could continue to increase in the short term but will begin to plateau and reduce once the market's expectation of rises in Bank Rate and inflation fears subside. Longer term yields may face upward pressure towards the end of Arlingclose's forecast period as the economy moves back to a sustained footing and policy expectations start to strengthen.

Downside risks remain – the damage from the pandemic will have lasting effects and there is the risk of further virus mutations due to the uneven global rollout of vaccines. Downside risks also arise from potential future vaccine shortages as the global demand for vaccines increases.

APPENDIX 6

Interest & Capital Financing Costs – Budget Monitoring 2021/22

April 2021 to June 2021	YEAR END POSITION			ADV/FAV
	Budgeted Spend or (Income) £'000	Forecast Spend or (Income) £'000	Forecast over or (under) spend £'000	
Interest & Capital Financing				
- Debt Costs	8,049	8,049	0	
- Internal Repayment of Loan Charges	(10,338)	(10,338)	0	
- Ex Avon Debt Costs	1,020	1,020	0	
- Minimum Revenue Provision (MRP)	8,307	8,307	0	
- Interest on Balances	(208)	(208)	0	
Total	6,830	6,830	0	

APPENDIX 7

Summary Guide to Credit Ratings

Rating	Details
AAA	Highest credit quality – lowest expectation of default, which is unlikely to be adversely affected by foreseeable events.
AA	Very high credit quality - expectation of very low default risk, which is not likely to be significantly vulnerable to foreseeable events.
A	High credit quality - expectations of low default risk which may be more vulnerable to adverse business or economic conditions than is the case for higher ratings.
BBB	Good credit quality - expectations of default risk are currently low but adverse business or economic conditions are more likely to impair this capacity.
BB	Speculative - indicates an elevated vulnerability to default risk, particularly in the event of adverse changes in business or economic conditions over time.
B	Highly speculative - indicates that material default risk is present, but a limited margin of safety remains. Capacity for continued payment is vulnerable to deterioration in the business and economic environment.
CCC	Substantial credit risk - default is a real possibility.
CC	Very high levels of credit risk - default of some kind appears probable.
C	Exceptionally high levels of credit risk - default is imminent or inevitable.
RD	Restricted default - indicates an issuer that has experienced payment default on a bond, loan or other material financial obligation but which has not entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, and which has not otherwise ceased operating.
D	Default - indicates an issuer that has entered into bankruptcy filings, administration, receivership, liquidation or other formal winding-up procedure, or which has otherwise ceased business.

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