

Bath & North East Somerset Council

MEETING/ DECISION MAKER:	Policy Development & Scrutiny Panel	
MEETING/ DECISION DATE:	6 July 2023	
TITLE:	Emission-based car park charges for Bath	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Please list all the appendices here, clearly indicating any which are exempt and the reasons for exemption		

1 THE ISSUE

- 1.1 The purpose of this report is to provide an update to Policy Development & Scrutiny Panel on proposals to introduce emissions-based parking charges in Bath car parks, as agreed by Full Council on 9 February 2023, and the work that is underway to deliver these proposals for residents.

2 RECOMMENDATION

The Panel is asked to;

- 2.1 Note the replacement of new pay and display machines across council car parks and on street locations as part of the council's forward plan of works, which is a key enabler to the delivery of emissions-based charges.**
- 2.2 Note the introduction to emission-based parking charges in Bath car parks as agreed in the council's budget by Full Council on 9 February 2023, with more polluting vehicles paying more for their parking.**
- 2.3 Note the sensitivities regarding a further potentially significant rise to some season ticket customers within the last 12 months and the proposal to mitigate this for existing customers.**
- 2.4 Note the draft signs and, recognising the complexity, provide further comment as required.**

3 THE REPORT

Background & Context

- 3.1 Following extensive engagement and consultation work during 2021 and agreed by Cabinet in July 2021, the council implemented emission-based parking charges for residents on street parking permits across all resident parking zones.
- 3.2 These emission-based charges are linked to the CO2 emissions of the vehicle, or engine capacity where emission data is not available. Vehicles are classified in line with the DVLA Vehicle Excise Duty Bands (as at 1st April 2017). The higher the engine's emissions, the higher the charge for the permit. Therefore, the higher charges aim to reduce the use of more polluting vehicles to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to pedestrians by air pollution.

Paying for Parking

- 3.3 Acceptance of cash for paid for parking is a key source of revenue for the council, with cash payments representing 28% of customer transactions totalling a combined £1M of parking income.
- 3.4 Parking Services has been successful in encouraging the remaining 72% of customer transactions for paid for parking to use our digital channels via MiPermit. MiPermit can be used to pay for parking via either the mobile app; the mobile web; a text service; or via a helpline. MiPermit use by customers now accounts for over 88%, or £8M, of all Pay & Display (P&D) income; however, it should be noted that the proportion of cash use increases for shorter duration, lower value stays.
- 3.5 Recent data published by Ofcom in 2022 shows that 97% of the UK population have access to a mobile phone, with this dropping to 90% for a smartphone. It's reasonable to expect that this average will vary when looking at individual age groups, and the Ofcom data identifies that for those aged 65 and over the percentages fall 90% and 68% respectively.
- 3.6 Cash remains an important source of revenue for paid for parking and additionally provides an important and accessible channel for customers without access to a mobile phone or smartphone.

Government's view on the accessibility of cashless parking

- 3.7 On 4th April the Secretary of State for Levelling Up, Housing & Communities wrote to Council Leaders to ensure that public parking provision on the High Streets remained accessible and that no part of society is digitally excluded.
- 3.8 The council has three minor locations that only accept payment via MiPermit, with no cash alternative for operational reasons. These are Broad Street car park; the temporary Green Park Road car park (both in Bath); and The Shallows seasonal car park in Saltford. Cash payment has recently been introduced at all three park and rides for customers not using the bus service.
- 3.9 This report makes no proposals to remove cash as a payment channel from any further locations, and furthermore (as detailed in paragraphs 3.3 to 3.6) cash

payments remain a valuable source of income, particularly in short stay locations where the charges are less.

Replacement of Pay and Display (P&D) machines

- 3.10 The council has 101 P&D machines across both its car parks and on street paid for parking locations. Equipment varies by age and supplier which can result in a varying experience for the customer both in terms of usability, reliability, or the impact by ambient environmental conditions, and leading to negative feedback from customer's and reputational damage. Out of order equipment may also discourage some customers from purchasing parking, leading to loss of income and the issue of Penalty Charge Notices.
- 3.11 Existing machines are now at least 12 years old and are now obsolete. They are unable to provide any real time data on customer purchases to Civil Enforcement Officers (CEO), who must manually check each vehicle for the display of a valid ticket where no digital MiPermit stay is identified. The lack of real time data for the 28% of parking stays paid for in cash results in an incomplete strategic data set which, if complete, could be used proactively to understand customer compliance with the terms and conditions (i.e. those that have paid for parking) when aligned to ANPR data.
- 3.12 The current capital replacement programme presents an opportunity to ensure modern and standardised equipment is in place across the council's paid for parking locations, whilst ensuring improved reliability and security for assets which remain outside in all conditions and are responsible for over £1M worth of income per year.
- 3.13 The council has successfully reduced its number of installed machines from circa 150 machines to 101 since 2019. As part of this replacement programme any further equipment identified as surplus to requirements (noting the channel shift to MiPermit and the council position on the importance of cash as an option set out in paragraphs 3.3 to 3.9) will be removed and may not be replaced to further reduce ongoing liabilities for maintenance and cash collection.
- 3.14 The new equipment will limit the practice of passing unused parking tickets between customers and enable live transactional data to be uploaded in real time and made available to CEOs, improving their effectiveness by ensuring all valid parking stays are recorded on their handheld devices. This will reduce the time required patrolling car parks, allowing more time to be spent in residential streets. This improved efficiency is linked to further savings of £10K agreed by Full Council in the budget for 23/24.
- 3.15 The age of the existing equipment prevents them being upgraded to deliver emission-based parking charges (or any kind of variable charging tariff) to cash paying customers. Equipment in Bath car parks will be upgraded as a priority to facilitate the emission-based charges.
- 3.16 The replacement programme avoids additional revenue spend of hundreds of pounds per machine to upgrade the equipment's mobile communications to accommodate the national decommissioning of 2.5G and 3G mobile networks across 2023 and into 2024.

- 3.17 Card payment terminals were historically present in some long stay car parks and were removed to facilitate savings during the pressures of the COVID-19 pandemic. The terminals used in our now discontinued equipment led to financial pressures and reputational risk due to frequent dropouts and terminated transactions [by the banks] causing customer frustration and increased customer contact. The removal of card terminals encouraged a significant increase in MiPermit usage (Paragraph 3.4) where fees are paid by the customer.
- 3.18 The lack of card payment facilities remains unpopular with many customers and the machine replacement programme presents an opportunity to address this consistent level of dissatisfaction amongst many customers.
- 3.19 Card payment terminals will be installed in all new machines, subject to operational or technical restrictions.
- 3.20 Whilst MiPermit usage remains high, and behaviours are expected to be embedded within most users, it's expected that the reintroduction of card payment at machines will result in some nominal behaviour change amongst MiPermit users who will move back to paying at a machine, at a cost to the council of £0.12 per transaction. This should also be considered alongside the qualitative improvements such as improved customer satisfaction, accessibility benefits from this extra payment channel and reduced complaints.
- 3.21 Equipment will be replaced in phases:
- (1) Bath car parks– end of August 2023
 - (2) All other car parks – Autumn 2023
 - (3) Bath on street – Jan 2024

Emissions based car park charges

- 3.22 We are proposing to introduce emission-based charges for parking in Bath car parks only, due to the clean air direction.
- 3.23 The introduction of emission-based charging aims to improve the safety of vulnerable people within the community by improving air quality and reducing congestion so those with more polluting vehicles pay more and are encouraged to change behaviours to make other travel choices where alternatives exist.
- 3.24 Air pollution can cause or contribute to a variety of health conditions, particularly amongst the young and elderly. 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). Any reduction in emissions within the city centre will have a beneficial impact on those living and visiting the city centre.
- 3.25 An emission-based charge aims to incentivise the displacement of more polluting vehicles away from city centre car parks to more sustainable alternatives, including the city's park and ride service (where no charge increases are proposed) or other public transport options.

- 3.26 The new charges will be based on the existing parking prices introduced on 1st November 2022 and will replicate the structure and rationale of the council's emission-based residents parking permits as per VED bands.
- 3.27 More polluting vehicles emitting more than 131g/km of CO₂ will pay progressively more for their parking. The price of parking for diesel fuelled vehicles will be further increased (compared to a similar sized and CO₂ level emitting engines of other fuel types) due to the higher levels of other pollutants emitted from the tail pipe following the combustion of this fuel type.
- 3.28 Electric vehicles (which are required to pay for their parking and pay for their charging), and those with a non-diesel fuelled internal combustion engine that emits 130g/km or less of CO₂, will not see any increase in their parking charges as part of these proposals. The proposed charging structure for Bath car parks is outlined in Appendix A to this report, with the charges for diesel fuelled vehicles shown in table 2 of Appendix A.
- 3.29 It should be noted that whilst other local authorities have implemented emissions-based parking charges with their cashless providers, we are not aware that any council has enabled this for customers when using on site Pay and display equipment.
- 3.30 The actual charge the customer must pay will be presented to them when they supply their Vehicle Registration Mark (VRM) into the appropriate channel (MiPermit or the P&D machine).
- (1) The exact process flows for customers using an onsite machine are yet to be finalised; however, MiPermit use will remain unchanged.
 - (2) In line with resident permits the supplied VRM will be checked against publicly available DVLA data (which excludes personal data such as keeper details) to determine CO₂ emissions, fuel type and engine capacity.
 - (3) This is then matched against the appropriate charge and presented to the customer prior to purchase.
- 3.31 It should be noted that the less than 2% of MiPermit users that make use of the text service to pay for parking will have their charge stated within the confirmation text they receive after creating their parking stay. This is a result of the limitation of the technology and can only be prevented by removing this access channel, preventing non-smartphone users from using MiPermit. Our signage and direct engagement with text service users will seek to encourage their shift to other payment methods and advise them of this change.
- 3.32 Analysis of pay and display data suggests that 34% of customers will experience no change from these proposals. The remaining 66% of customers are those with more polluting vehicles (those with diesel engines or CO₂ output over 131g/km) and will experience their car park charge rise by an amount relative to their vehicle's emissions under these proposals.
- 3.33 All customers can check their vehicle's emissions rating or engine capacity, free of charge, online at <https://www.gov.uk/get-vehicle-information-from-dvla>
- 3.34 Where a DVLA lookup returns no result, it's proposed the customer is charged the maximum tariff as it hasn't been possible to determine any vehicle

details. This will be clearly advertised and will apply to vehicles that are not registered with the DVLA for a range of reasons, including all foreign registered vehicles.

- 3.35 How the new charges are communicated to customers is a key consideration in the success of these proposals and further consultation work is required as part of the TRO process, launching on 6 July 2023, in addition to engagement activities such as signage, website and communications to users.
- 3.36 Draft proposals for car park signage are outlined in Appendix B to this report.
- 3.37 Emission-based parking charges are not proposed for the Park and Rides or the Odd Down Coach Park as these facilities are located outside the city centre. Any increase to coach parking charges is anticipated to disincentivise the use of this location, resulting in an increase in inappropriate on street parking by coaches in residential areas across the city.

Car Park Season Tickets

- 3.38 The council provides a limited range of season tickets that allow customers to purchase unreserved parking for long stay car parks in advance for periods of 1, 3, 6 and 12 months, with the customer free to amend the vehicle registered to the season ticket as they wish.
- 3.39 In November 2022, after a review of car park charges, the charge for season tickets was aligned to represent a 35% discount against the equivalent daily P&D charge at all locations. Prior to this review the charge was variable across locations and was a disincentive to the use of more sustainable modes of transport by offering a disproportionate discount of up 70%. The review resulted in significant season ticket cost increases which generated national press interest (<https://www.bbc.co.uk/news/uk-england-somerset-63730610>).
- 3.40 Under these proposals the maximum charge for a season ticket linked to the emissions of the vehicle is shown below:

<i>Current annual charge (7day permit)</i>	<i>£4056.98</i>
Proposed charge - (0-130g/km CO2 petrol or an electric vehicle)	£4056.98
Proposed maximum charge - (most polluting diesel vehicle)	£5172.05

- 3.41 This would result in a second significant increase in cost (equivalent to 27% of the existing charge) within 12 months for customers with the most polluting vehicles.
- 3.42 In order to recognise the sensitivity of residents with no access to their own off street or on street parking and those who may be financially impacted for example by the cost-of-living crisis, it's proposed that emission-based charges for season tickets are limited to new customers only at launch.

- 3.43 Customers that currently purchase season tickets, and where their account shows a valid season ticket at the date of the proposals being implemented, can continue to purchase their existing season ticket at current charges for 12 months after the emission-based charges launch to help them plan and adjust to the new charges, for example to consider alternative options or the purchase of a lower emission vehicle.
- 3.44 The new emission-based season tickets will only allow preregistered vehicles to be used on the permit in order to prevent a permit being purchased for a least polluting vehicle and then a more polluting vehicle added after purchase. This replicates how residents on street permits operate. Changes can be made to accommodate unexpected changes in car ownership, or for collisions, but only to less polluting vehicles and are subject to a £10 administration charge. A new season ticket must be purchased where a replacement vehicle is more polluting.

Hotel Permits

- 3.45 Hotel permits enable parking in council car parks (for properties located in central zone; zone 1; or zone 6) or on street permit bays (for properties located in all other zones) and are provided to eligible businesses free of charge. Account holders are charged for each use over a 24 hour period (midday to midday) and the charge is linked to the daily rate of a 24 hour stay in a Bath car park.
- 3.46 As these permits provide both on street and car park parking depending on the resident parking zone the premises is located in, there are no proposals to align the cost of using a hotel permit to the emissions of the vehicle at this time.

4 STATUTORY CONSIDERATIONS

- 4.1 This proposal is made in accordance with the Road Traffic Regulation Act 1984, section 35 (Variation of charges at off-street parking places). An order under section 35(1)(a)(iii) of this Act makes provision as to the charges to be paid in connection with the use of off-street parking places, the authority making that order may vary those charges by notice given under this section.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 Emission-based pay and display charges were included in proposals for the council's budget in 23/24, with £450k of annual savings identified (£225k in 23/24, £225k in 24/25).
- 5.2 The replacement of pay and display machines is an existing programme from the council's forward plan of capital works, with a budget of £530k.

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 An EQIA has been developed as part of this project and is included within Appendix C. This will be reviewed as appropriate including following the consideration of feedback received from the statutory consultation.
- 7.2 The Equalities Officer has been consulted during the development of this draft document, which was also presented to the B&NES Independent Equalities Advisory Group on 13 June 2023.

8 CLIMATE CHANGE

- 8.1 The proposal's objective is to improve the safety of road users (particularly vulnerable people) by improving air quality.
- 8.2 A reduction in vehicle emissions more generally will also see a reduction in the tail pipe emissions (including carbon) linked to climate change, helping to address the climate and ecological emergency; however, this is not the core objective.

9 OTHER OPTIONS CONSIDERED

- 9.1 None. This proposal continues the process and rationale introduced for emission-based charges for on street residents parking permits.

10 CONSULTATION

- 10.1 Significant engagement and consultation work was undertaken to introduce the concept of emission-based charging for On-Street permits in 2021 and agreed by the council's Cabinet in July 2021. The consultation documentation and outcome reports are available online at:
- (1) Spring 2021 engagement (including cabinet report) – <https://beta.bathnes.gov.uk/parking-permits-consultation-april-2021>
 - (2) Autumn 2021 TRO consultation – <https://beta.bathnes.gov.uk/parking-TRO-consultation-autumn-2021>
- 10.2 The emission-based car parking charges have been developed in cooperation with Parking Services, the Director of Place Management and Cabinet members, and proposed for 2023/24 as part of the Council's budget setting process, as approved by full Council in February 2023.
- 10.3 Emissions based car parking charges will require a change to the Traffic Regulation Order, which requires a statutory consultation over a period of 21 days to allow all interested stakeholders the opportunity to comment. This public consultation is due to launch on 6 July 2023.
- 10.4 As these proposals impact visitors to the city, the customers who comprise the 72% of transactions paid for via MiPermit will receive direct communication (where appropriate details are held) alerting them to the proposals and the consultation so they can feed in their views.

Contact person	Andrew Dunn, 01225 39 5415
Background papers	<ul style="list-style-type: none"> • Single Member Decision E3252 <i>Addressing air quality and traffic management issues through the management of parking behaviour on the highway</i>, February 2021. https://democracy.bathnes.gov.uk/mgIssueHistoryHome.aspx?IId=31781&PlanId=771&RPID=35906096 • Cabinet report E3281 <i>On street parking permits and charges</i>, July 2021. https://democracy.bathnes.gov.uk/mgAi.aspx?ID=27560#mgDocuments
Please contact the report author if you need to access this report in an alternative format	