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Bath City Centre Accessibility Study Final Report

Bath & North East Somerset Council

18th May 2021

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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

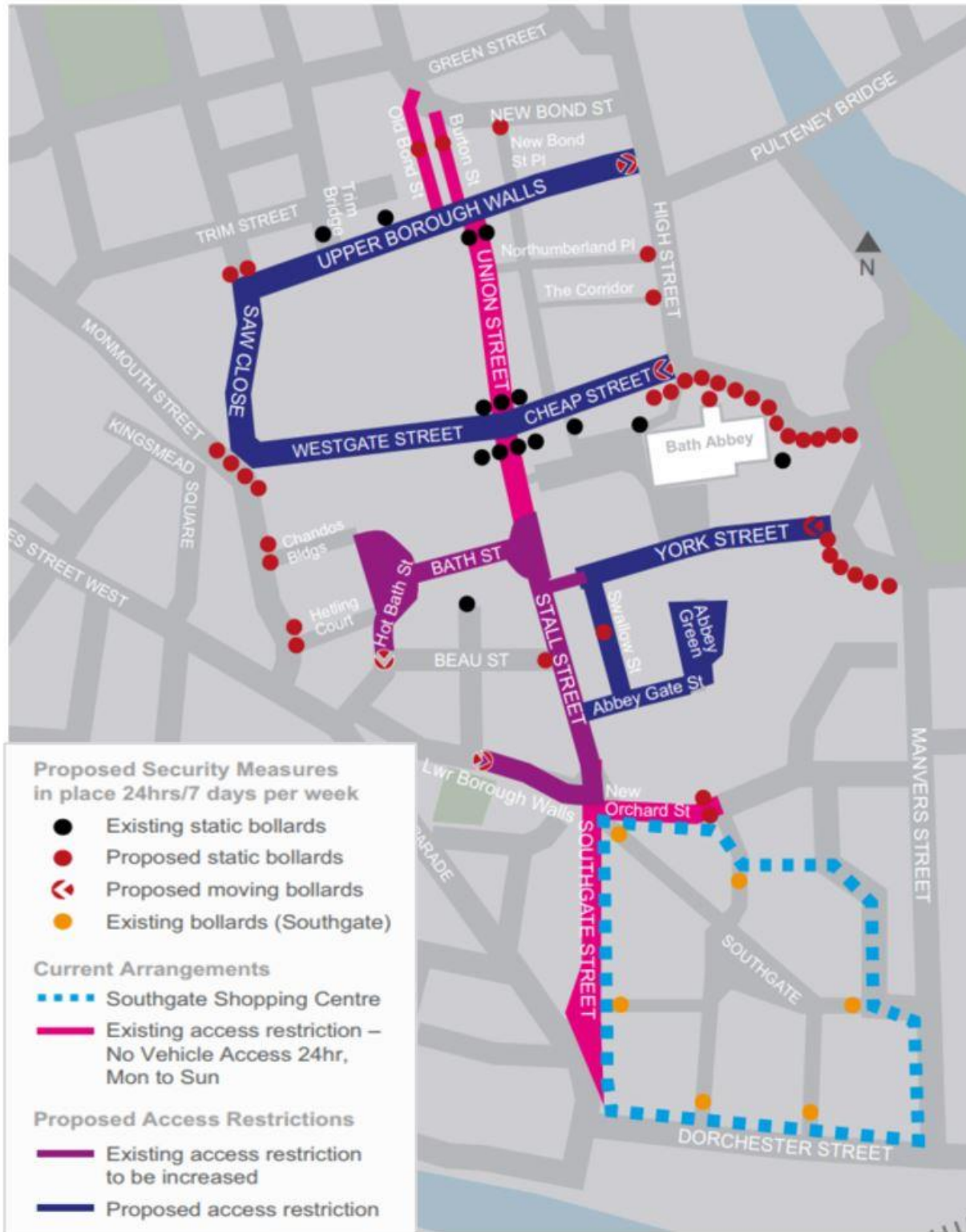


Figure 2: Proposed Measures

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 Midday) 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)

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