

OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

3

APPROVAL TO PROGRESS TRO

PREPARED BY: Traffic Management Team, Highways and Transport Group

TITLE OF REPORT: RPZ HUNGERFORD ROAD AND ST JOHN'S ROAD AREA

PROPOSAL: Various Waiting and Loading and Parking Restrictions

SCHEME REF No: 22 – 028

REPORT AUTHOR: Phill Batty (Aecom)

1. DELEGATION

The delegation to be exercised in this report is contained within **Part 3, Section 4** of the Constitution under the **Delegation of Functions to Officers**, as follows:

Section A	The Chief Executive, Strategic Directors, Divisional Directors and Heads of Service have delegated power to take any decision falling within their area of responsibility...."
Section B	Without prejudice to the generality of this, Officers are authorised to: serve any notices and make, amend or revoke any orders falling within his/her area of responsibility.
Section D9	An Officer to whom a power, duty or function is delegated may nominate or authorise another Officer to exercise that power, duty or function, provided that Officer reports to or is responsible to the delegator.

For the purposes of this report, the Director of Place Management holds the delegated power to make, amend or revoke any Orders.

2. LEGAL AUTHORITY

This proposal is made in accordance with the Road Traffic Regulation Act 1984, which under Section 1 provides, generally, for Orders to be made for the following reasons, and in the case of this report specifically for the reason(s) shown below:

(a)	for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or	X
(b)	for preventing damage to the road or to any building on or near the road, or	
(c)	for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or	X
(d)	for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property,	
(e)	(without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or	

(f)	for preserving or improving the amenities of the area through which the road runs, or	X
(g)	for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality)	

3. **PROPOSAL**

To implement various parking, waiting and loading restrictions, including designated parking bays reserved for disabled badge holders only and permit holders only.

4. **BACKGROUND**

Bath and North East Somerset Council's Traffic Management Team has been developing with the support of local Ward Councillors and in relation to the Council's policy to improve the parking situation for local residents and help communities to create healthier, safer streets (Low Traffic Neighbourhood Strategy – July 2020 & Residents' Parking Schemes July 2020) a scheme to introduce a Residents' Parking Zone (RPZ) covering the following area: the area around Locksbrook Road, Audley Grove, Hungerford Road, Edward Street, Audley Avenue, St Michaels Road, St Johns Road, and Windsor Castle, Bath.

This RPZ will aim to prioritise on-street parking for residents and provide accessible parking near social hubs within the area including places of worship, and local businesses.

The implementation of the new RPZ will deter parking by non-residents who may currently use the area to park and commute into the City Centre or other facilities in the neighbouring areas where parking may be limited, restricted, or charged for. The initial proposal was produced as a draft to be shared with the public during a 28-day public consultation. The consultation took place between the 5th May to 2nd June.

A virtual online event [20th May 2022 from 4pm to 8pm], and an in-person event [20th May 2022 from 4pm to 8pm at Weston Methodist Church] were held to provide further information and enable consultees to talk to an advisor, view the proposal plans, ask questions, and submit a questionnaire.

In total, there were 178 responses to the proposed Residents' Parking Zone. 174 of these came through the online questionnaire with 4 replying by letter or email.

126 responses were from within the proposed Zone with a further 52 from outside the area, one respondent did not state their location. Slightly over half (55%) of respondents' object to the proposals for the Residents' Parking Zone with just over a quarter (26%) supporting them.

Residents living inside the proposed Parking Zone were more likely to support it than those who live outside the Parking Zone (32% compared with 12%).

There were differences in the levels of support shown for the proposals, almost all (91%) of respondents who rate the current parking provision as bad supported or partially supported the plans compared to 13% of those who currently feel parking provision is good.

Whilst overall support for the scheme is quite low, analysis of the responses suggests that on certain streets support is generally higher.

It is the opinion of the local Ward Councillors' that support certainly exists for a Residents permit parking scheme which covers Hungerford Road and St Johns Road and that since the implementation of a scheme to cover Hungerford Road and St Johns Road only is likely to

have significant effect upon neighbouring streets through migration of and displacement of identified parking issues the proposals should be progressed largely unchanged.

Amendments to be made:

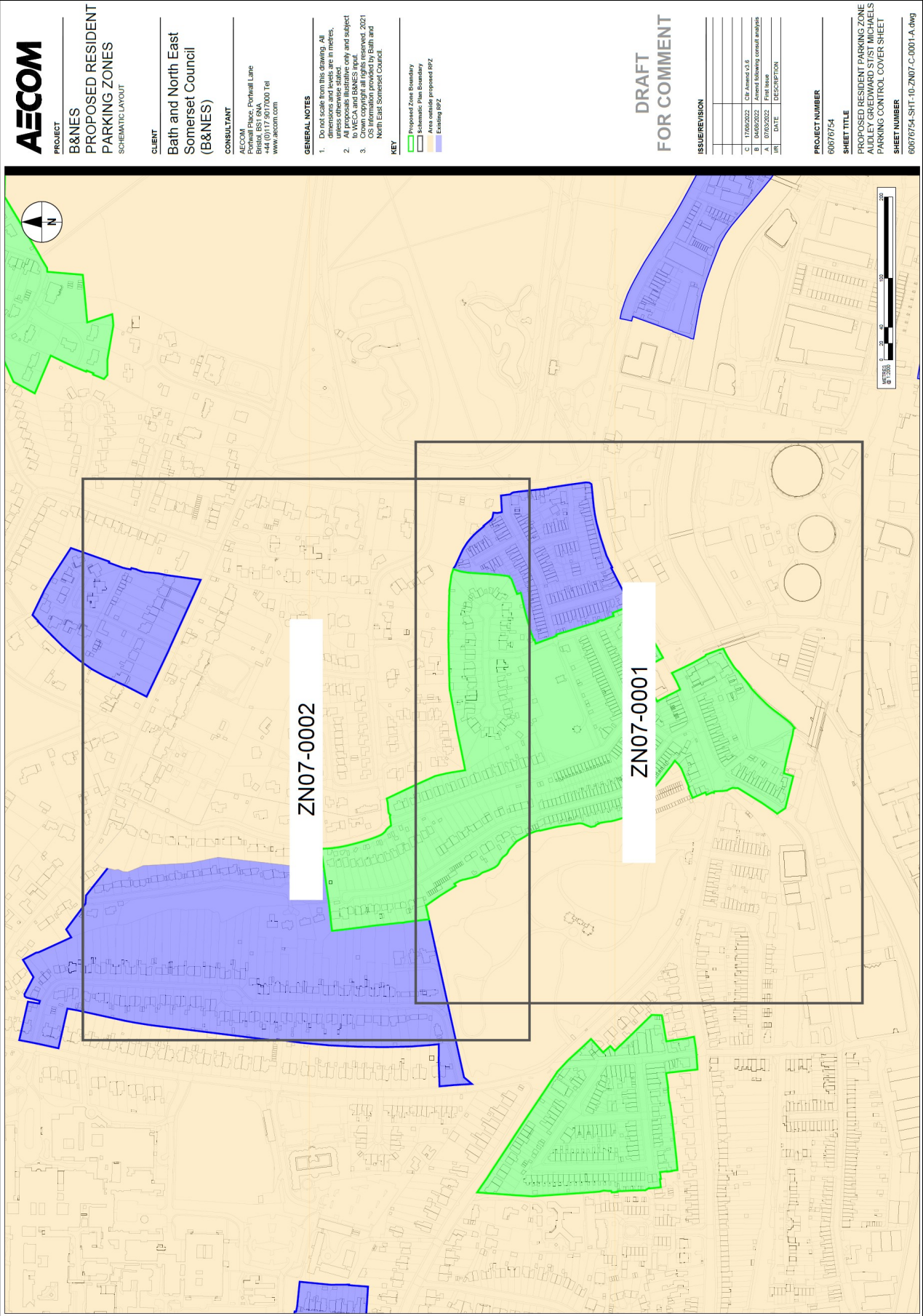
- 1) On the west side of St Michaels Road amend the three proposed bays to dual-use providing non-residents with parking for up to 3 hours no return within 1 hour in this location.
- 2) On St Johns Road outside property 24, convert advisory disabled bay identified as redundant into permit holders only bay.
- 3) On Edward Street outside property 26, convert advisory disabled bay identified as redundant into permit holders only bay.
- 4) On Edward Street outside property 30, convert advisory disabled bay identified as redundant into permit holders only bay.
- 5) On Edward Street outside property 34, convert advisory disabled bay identified as redundant into permit holders only bay.
- 6) On the west side of St Michaels Road, convert car club bay identified as redundant into permit holders only bay.

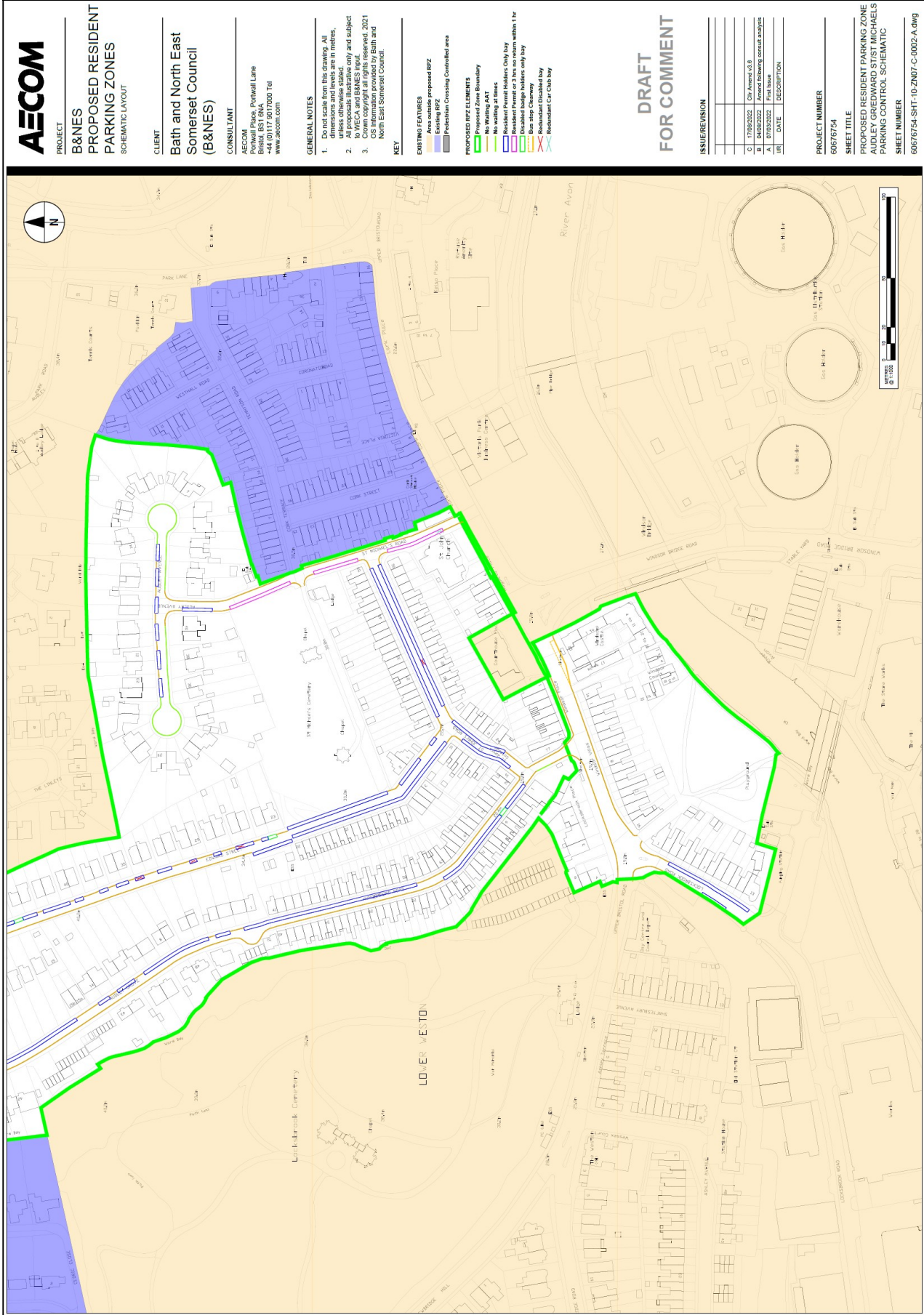
5. SOURCE OF FINANCE

This proposal is being funded by RPZ capital budget TCRP001.

6. CONSULTATION REQUIREMENT

The proposal requires informal consultation with the Chief Constable, Ward Members and the Cabinet Members for Transport.





PROJECT

**B&NES
PROPOSED RESIDENT
PARKING ZONES
SCHEMATIC LAYOUT**

CLIENT

**Bath and North East
Somerset Council
(B&NES)**

CONSULTANT

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GENERAL NOTES

1. Do not scale from this drawing. All dimensions and levels are in metres.
2. All proposals illustrative only and subject to MECA and B&NES input.
3. All proposals are subject to approval by the 2021 CS Information provided by Bath and North East Somerset Council.

KEY

- EXISTING FEATURES**
- Area outside proposed RPZ
 - Existing RPZ
 - Pedestrian Crossing Controlled area
- PROPOSED RPZ ELEMENTS**
- Proposed Zone Boundary
 - No Waiting AAT
 - No waiting at times
 - Resident Permit Holders Only bay
 - Disabled badge holders only bay
 - Bus stop Clearway
 - Redundant Disabled bay
 - Redundant Car Club bay

**DRAFT
FOR COMMENT**

ISSUE/REVISION

ISSUE	DATE	DESCRIPTION
C	17/03/2022	Clarified v3.0
B	04/03/2022	Amended following council meetings
A	07/03/2022	Initial issue

PROJECT NUMBER

60576754

SHEET TITLE

**PROPOSED RESIDENT PARKING ZONE
AUDLEY GREDWARD SYST MICHAELS
PARKING CONTROL SCHEMATIC**

SHEET NUMBER

60576754-SHT-10-ZN07-C-0002-A.dwg



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B&NES
PROPOSED RESIDENT
PARKING ZONES
SCHEMATIC LAYOUT

CLIENT

Bath and North East
Somerset Council
(B&NES)

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 - Proposed Crossing Controlled area
- PROPOSED RPZ FEATURES
- Proposed Zone Boundary
 - No Waiting AAT
 - No waiting at times
 - Resident Permit Only Bay
 - Resident Permit Only Bay within 1hr
 - Disabled badge holders only bay
 - Blue stop clearance
 - Resident Permit Only Bay
 - Resident Car Club bay

DRAFT
FOR COMMENT

ISSUE/REVISION

ISSUE	REVISION
C	17/05/2022
A	07/03/2022
DATE	DESCRIPTION

PROJECT NUMBER

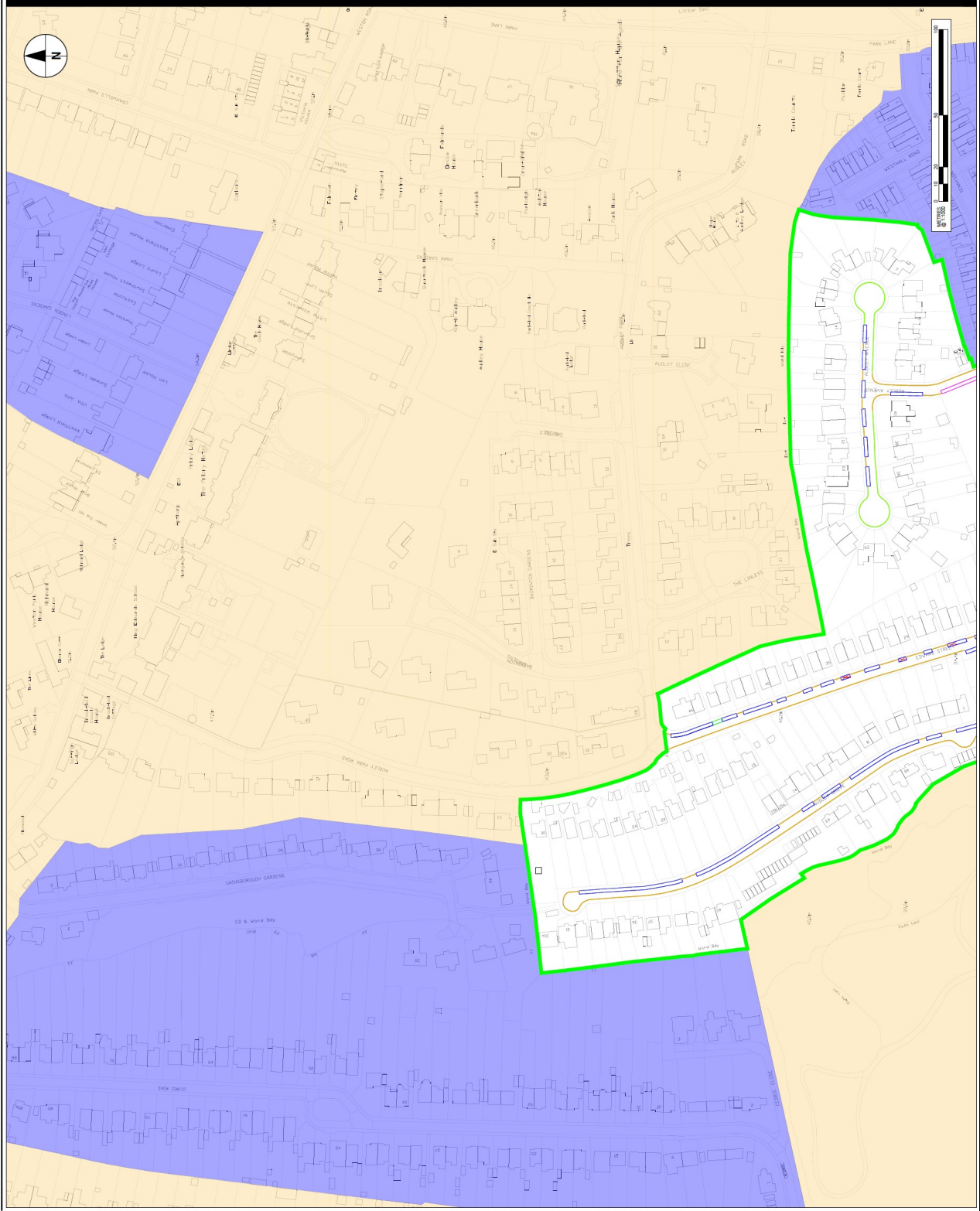
60076754

SHEET TITLE

PROPOSED RESIDENT PARKING ZONE
AUDLEY GREEDWARD STREET MICHAELS
PARKING CONTROL SCHEMATIC

SHEET NUMBER

60076754-SHT-10-ZN07-C-0003-A.dwg



7. COMMENTS RECEIVED TO DATE

Chief Constable

Thank you for your email and attachments regarding the proposed Residents Parking Zone for Hungerford Road and St John's Road area, Bath as shown on the attached schematics. It is understood that the proposed Hungerford Road and St John's Road Area RPZ TRO is one of many currently being considered for within the Bath area.

The informal TRO Report states that the proposal is *"To implement various parking, waiting and loading restrictions, including designated parking bays reserved for disabled badge holders only and permit holders only."*

4. BACKGROUND

Bath and North East Somerset Council's Traffic Management Team has been developing with the support of local Ward Councillors and in relation to the Councils policy to improve the parking situation for local residents and help communities to create healthier, safer streets (Low Traffic Neighbourhood Strategy – July 2020 & Residents' Parking Schemes July 2020) a scheme to introduce a Residents' Parking Zone (RPZ) covering the following area: the area around Locksbrook Road, Audley Grove, Hungerford Road, Edward Street, Audley Avenue, St Michaels Road, St Johns Road, and Windsor Castle, Bath.

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Amendments to be made:

- 1) On the west side of St Michaels Road amend the three proposed bays to dual-use providing non-residents with parking for up to 3 hours no return within 1 hour in this location.*
- 2) On St Johns Road outside property 24, convert advisory disabled bay identified as redundant into permit holders only bay.*
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- 4) On Edward Street outside property 30, convert advisory disabled bay identified as redundant into permit holders only bay.*
- 5) On Edward Street outside property 34, convert advisory disabled bay identified as redundant into permit holders only bay.*
- 6) On the west side of St Michaels Road, convert car club bay identified as redundant into permit holders only bay.”*

The proposals should meet the Statement of Intent regarding their introduction.

Any increase in parking restrictions brings with it a potential increase in the need for enforcement. Following the introduction of Civil Parking Enforcement we are unable to address this, as enforcement of waiting restrictions backed by a Traffic Regulation Order within the Bath and North East Somerset Council area, rests with B&NES Parking Services rather than ourselves.

We are also unable to provide dedicated enforcement to any reported displaced parking into adjacent areas and would request that additional parking restrictions be considered should such displacement occur if the proposals are implemented. Any enforcement of potential obstruction offences would be intelligence led and targeted based on gathered information and circumstances at the time at each potential obstruction offence location.

Parking Services

Andrew Dunn – Team Manager Parking Services - I broadly support the implementation of the restrictions but there should be a recognition that additional restrictions require additional revenue support for new staff to reflect the fact that every new restriction requires a very small percentage of a staff member to enforce on a regular or semi-regular basis.

Whilst this impact may itself be small for a single scheme, the cumulative impact may have an impact for the enforcement across other locations.

Ward Members

Kingsmead:

Cllr Sue Craig – The situation with the TRO is not quite as was presented to us at the last meeting so I'm grateful to you for the clarification and Manda for questioning our decision. I find myself on the horns of a dilemma. If we are going to follow the principle of only implementing the RPZ in the roads that supported it (and I'm struggling to see how we could justify any other option at the moment – hence the dilemma) then I don't see how we can implement any more than just Hungerford Road and St John's Road? These are the people who have been asking for measures to be put in place so I'm comfortable with this. I remain concerned about displacement but this has been explained on many occasions and has been

demonstrated in practice by what has happened when the Tennyson Road scheme was put in place.

Here are the figures that were sent to me:

	Object	Partially Support	Support	No Feeling	TOTAL
Audley Avenue	9	1	3	0	13
Audley Grove	16	2	2	0	20
Edward Street	18	5	6	0	29
Hungerford Road	10	4	9	0	23
Lambridge Place	1	0	0	0	1
Locksbrook Place	1	2	0	0	3
St John's Road	9	4	19	0	32
Upper Bristol Road	1	0	0	0	1
	65	18	39	0	122

I have put them in a spreadsheet – here they are with the responses represented as a percentage of the overall number of responses for each street, and also with “support” and “partially support” combined, as I’m advised that the comments alongside the partial supports were generally in favour of the scheme but with amendments. Again – this shows Edward St is against the RPZ:

	Object	Part Supp	supp	total	%obj	%part supp %
St John's Road	9	4	19	32	28%	13%
Locksbrook Place	1	2	0	3	33%	67%
Hungerford road	10	4	9	23	43%	17%
Edward Street	18	5	6	29	62%	17%
Audley Avenue	9	1	3	13	69%	8%
Audley Grove	16	2	2	20	80%	10%

There is a key piece of information here which I don’t have, is there a number of responses we COULD have had for each street? If I could have this, it may help (or not!) with our decision - I could add it to my spreadsheet. Edward St, for instance, has quite a short terrace – how many of them actually responded? Does the postcode change at the end of the terraced part of the street? Given the figures above, the people in the terraced houses MAY have all, or almost all, voted in favour, in which case I would be happy with the option you have put forward which includes all the terraces? As always – the devil is in the detail, and the sample numbers here are quite small so the detail is actually very important?

You mention Locksbrook Road – this didn’t figure at all in the numbers above, so I don’t know how we can say they were definitely in favour of the measures?

One final point – If we do end up with only Locksbrook and Hungerford then I would say we should include the terraces along the Upper Bristol Road. This is a complicated topic by email but I would be interested in the views of the others of you reading this?

Response: I've been able to get some clarification and we've managed to also look at the

questionnaire responses in a little more detail for you.

Firstly, with regard to Locksbrook Road. You'll notice in the table that was originally sent to you earlier in the process that one street was actually down as being Lambridge Place. This unfortunately was a bit of a typo when the table was put together both hastily and manually. I had assumed that this was the case and therefore referred to the street as Locksbrook Road. In hindsight I should have highlighted this error and my assumption. I did not however appreciate that there is also a Locksbrook Place. I therefore apologise for any confusion.

So to clarify fully, and having double checked, there were only two responses from properties on Locksbrook Road, one support and one partially support. A single response was also received from Locksbrook Place which was also partially support.

I had assumed that all three of the responses were from Locksbrook Road (rather than Lambridge Place as shown in the table) and as such concluded that this would suggest general support hence suggesting that the street remain within the proposals and include it within the Zone. There are only 13 properties on Locksbrook Road and there were no specific objections received. I would therefore still consider including Locksbrook Road in the scheme.

There was only one single response from those canvased on Upper Bristol Road and this was an objection to the scheme. This was an objection relating to the requirement to purchase a permit. It is assumed likely that those residents unable to park in the rear access road behind Windsor Villas will currently park on Hungerford Road or St Johns Road, or possibly in Locksbrook Road. Aecom believe that the properties on Upper Bristol Road should remain within the zone thereby providing them at the least the opportunity to obtain permits since there is no on street provision on Upper Bristol Road itself.

For Edward Street we have looked through all of the returned questionnaires to determine from where the support and objections lie. In total there were 29 responses received from the total 46 properties on Edward Street.

Properties number 1 through to 22 are terrace properties. Properties number 23 through to 46 are semidetached with driveways. From further analysis we have separated the responses into these two defined housing types. There were a total of 12 responses from the 22 terraced properties. Four support, 3 partially support, and 5 object. From the semidetached properties there were significantly more objectors. Seventeen responses in total, 3 support, 1 partially support, and 13 object. As such it is fair to suggest that there is some support for the scheme from residents of the terraced properties (7-5 in favour), more so than from the semidetached properties (13-4 against) and this may give you sufficient justification for including the section of Edward Street up to the point at which the housing type changes.

St Michaels Road is somewhat more tricky to gauge in that there are not any actual residences that front on to it therefore there are no figures either for support or objection to the scheme. There is access only to the garages belonging to properties on Cork Street in the adjacent Zone. Aecom however believe that St Michaels Road should also be partially retained within the proposed Zone thereby providing additional capacity for resident permit holders albeit effectively as overspill from St Johns Road. Omitting St Michaels Road would not provide any restriction on non-permit holders and this may impact negatively both on residents of the adjacent streets needing to still park within the zone as well as for short term visitors to St Johns Church, the cemetery, and commercial properties on Upper Bristol Road. Fully

unrestricted parking in St Michaels Road is likely to continue to be misused by commuters and limit the availability of parking which could be used by residents or short term visitors. The bays on St Michaels Road are proposed to be dual use with 3hours for non-permit holders. We would suggest including St Michaels Road as a minimum up to the entrance to the cemetery thereby providing two dual use bays for use by residents or short term visitors only.

Given all the above, I have produced an additional option drawing (X3) as shown below which is a hybrid of the two recently sent option drawings. This amends the zone boundary to include all the terrace properties in St Johns Road, Hungerford Road, Locksbrook Road and Edward Street, and two thirds of St Michaels Road (this retains some unrestricted parking adjacent to the cemetery).

I hope this all gives some clarification to your queries and eases some of the apprehension with regard to the scheme to progress.

Additional option drawing (X3):

AECOM

PROJECT
B&NES
PROPOSED RESIDENT
PARKING ZONES
SCHEMATIC LAYOUT

CLIENT
Bath and North East
Somerset Council
(B&NES)

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GENERAL NOTES

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3. Crown copyright all rights reserved. 2021 OS Information provided by Bath and North East Somerset Council.

KEY

- EXISTING FEATURES**
- Area outside proposed RPZ
 - Existing RPZ
 - Proposed RPZ
 - Proposed RPZ Boundary
 - Proposed Zone Boundary
 - No Waiting at Times
 - No Waiting at Any Time
 - Resident Permit Holders Only Day
 - Resident Permit Holders Only Night
 - Drained badge holders only day
 - Blue stop Clearway
 - Redundant Disabled Bay
 - Standard Car Club Bay

**DRAFT
FOR COMMENT**

ISSUE/REVISION

IR	DATE	DESCRIPTION

PROJECT NUMBER

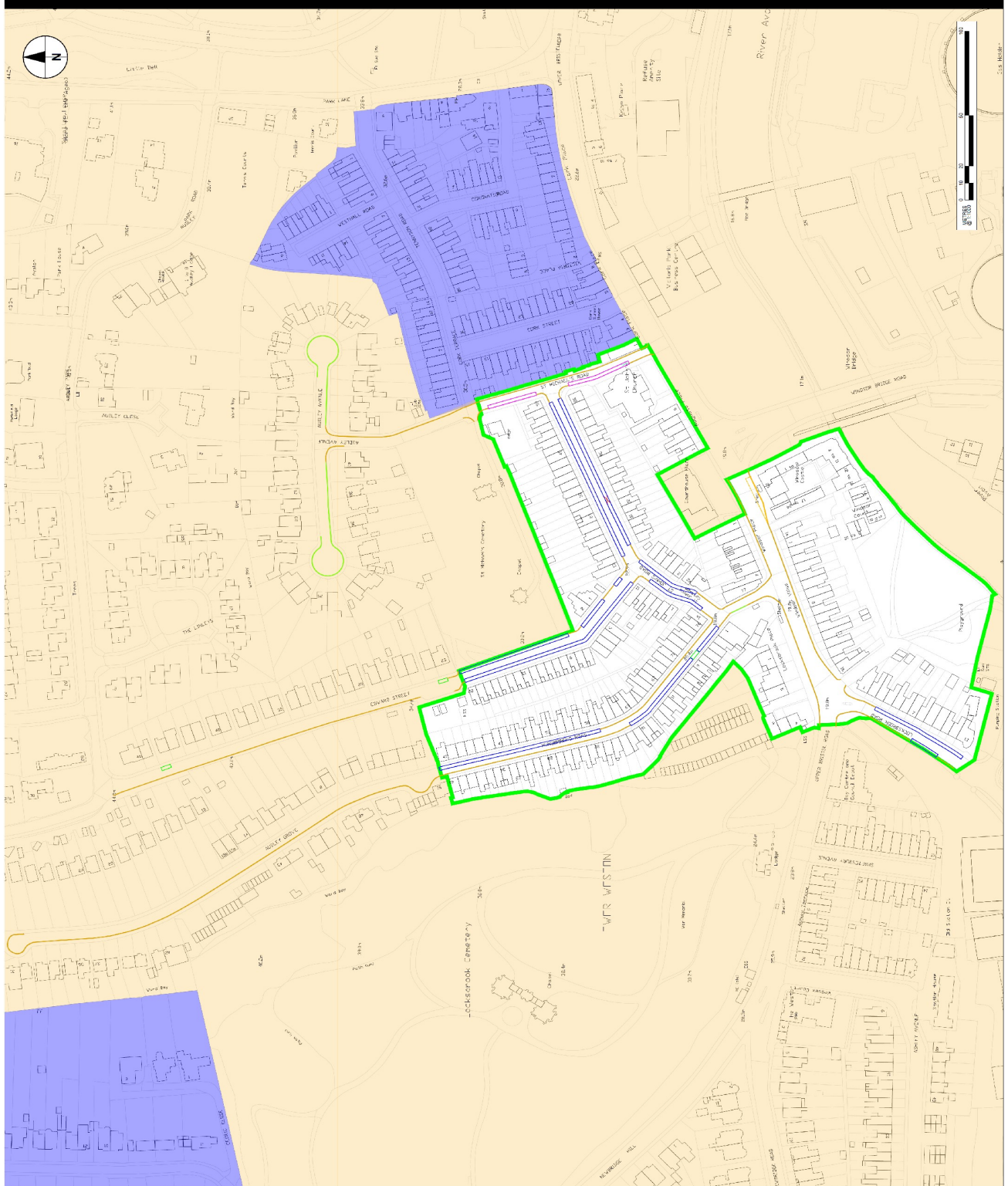
60876754

SHEET TITLE

PROPOSED RESIDENT PARKING ZONE
AUDLEY GREEN ROAD ST MICHAELS
PARKING CONTROL AMEND OPTION 3

SHEET NUMBER

60876754-SHT-10-ZN07-C-0002-X3.dwg



Cllr Sue Craig - That's really helpful – thanks so much for turning this information around so quickly for me. I think I can support (and defend) this variation so I would be happy to go with a TRO on this basis.

Just one other question – residents in Audley Grove had requested the DYL around the turning place at the top of the road and we decided we may as well roll it in with the other changes being proposed for the RPZ. I'm assuming any interventions outside the area of the revised RPZ would not now get included in this TRO? Would this mean that it needs to be included in the next area TRO. I wouldn't want it to be forgotten – especially given that there may now be displacement to Audley Grove?

Response: The proposed restrictions outside of the RPZ boundary would be included within this scheme and advertised at the same time due to possible displacement effects of vehicles migrating out of the Zone if installed.

Cllr Andrew Furse - I am supportive of these being progressed and note the reference to our ward councillor opinion in the text which in my view is correct.

Cabinet Members:

Cllr Manda Rigby – No comment.

8. RECOMMENDATION

As no significant objections and/or comments have been received following the informal consultation described above, the public advertisement of the Traffic Regulation Order should progress.



Paul Garrod
Traffic Management & Network Manager

Date: 7th September 2022

9. DECISION

As the officer holding the above delegation, I:

Approve the progression of this Traffic Regulation Order.	X
Agree that this Traffic Regulation Order should not be progressed at this time.	

In taking this decision, I confirm that due regard has been given to the Council's public sector equality duty, which requires it to consider and think about how its policies or decisions may affect people who are protected under the Equality Act.

A handwritten signature in black ink, appearing to read 'Chris Major', is centered within a light gray rectangular box.

Chris Major
Director for Place Management

Date: 07/09/22