

ANPR Camera Enforcement – Lower Lansdown Traffic Restrictions

Public consultation outcomes report

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1. Summary and Recommendation

- 1.1. The purpose of the consultation was to consider the principle of camera enforcement for contraventions of moving traffic restrictions at designated locations and restrictions where instances of non-compliance have been observed.
- 1.2. The majority of respondents (205 or 57%) were in support of the use of camera enforcement.
- 1.3. The consultation responses demonstrate a clear division in perspective and opinion amongst respondents.
 - 1.3.1. Support responses predominantly frame the issue as one of road safety and non-compliance, with enforcement seen as a necessary and proportionate solution.
 - 1.3.2. Object responses focus more on scheme legitimacy, proportionality, cost, and wider impacts, with enforcement viewed by many as reinforcing a flawed or contested approach.
- 1.4. Supporters see ANPR as necessary enforcement to address unsafe, non-compliant behaviour, while objectors broadly view it as disproportionate enforcement of a flawed or contested scheme, with wider impacts on congestion, cost, and public trust, which are themselves outside the scope of this consultation.

Recommendation

- 1.5. That camera enforcement of the following locations and restrictions be implemented:

- a) Illegal right turn at Cavendish Road into Sion Hill,
- b) Failure to comply with the mandatory left turn at the junction of upper Gay Street (southbound) and George Street.
- c) Unauthorised entry into upper Gay Street (northbound).

2. Purpose of the consultation

- 2.1. To summarise the public consultation on proposals to introduce Automatic Number Plate Recognition (ANPR) camera enforcement at specific locations in Lower Lansdown, and to outline the context, issues and proposed approach.

3. Background

- 3.1. In November 2024, three linked through-traffic restriction trials were introduced at Winifred's Lane, Gay Street and Catharine Place under Experimental Traffic Regulation Orders (ETROs). These formed part of the Council's Liveable Neighbourhoods program aimed at reducing through-traffic and supporting active travel.
- 3.2. A six-month consultation ran alongside the trial period until April 2025. On 30 January 2026, a decision was taken to make the schemes permanent, and this was upheld following a call-in process. The decision report identified potential mitigation measures, including ANPR enforcement, to support compliance and is published online at [link to the decision report for the schemes](#)

4. The Issue

- 4.1. The monitoring of vehicle movements at these locations has identified ongoing non-compliance with the restrictions despite appropriate and complaint signage being in place.
- 4.2. Key contraventions include:
 - a) Illegal right turn at Cavendish Road into Sion Hill,
 - b) Failure to comply with the mandatory left turn at the junction of upper Gay Street (southbound) and George Street.
 - c) Unauthorised entry into upper Gay Street (northbound).
- 4.3. These behaviours are unsafe, unlawful and undermine the scheme's objectives of improving safety and supporting walking and cycling.

5. Purpose of the Consultation

- 5.1. The consultation aimed to gather public input regarding the proposed implementation of camera enforcement utilising ANPR technology at two junctions, as well as to assess perspectives on these proposals and their possible effects on residents, businesses, and road users.

6. Proposals

- 6.1. The proposals involve introducing ANPR enforcement cameras at:
 - a) Cavendish Road/Sion Hill (East) junction and
 - b) Upper Gay Street/George Street junction.
- 6.2. The objective of camera enforcement is to improve compliance with the existing restrictions and reduce unsafe behaviour.
- 6.3. If implemented, there will be an initial six-month period where first contraventions receive a warning notice, followed by potential Penalty Charge Notices (PCNs) of up to £70 for further contraventions.
- 6.4. Camera enforcement is not required for the operation of the schemes but is proposed as a mitigation to address non-compliance.
- 6.5. Implementation of camera enforcement as detailed in this report is itself subject to the scheme consultation outcomes and appropriate statutory processes regarding the permanent schemes themselves.

7. Public Consultation

- 7.1. A public consultation was held to facilitate public feedback over a 42-day period between 23 March 2026 and 5 May 2026. This was publicised digitally via the Council's website; press release; and direct letter contact to local residents.
- 7.2. A dedicated web page was created on the council's website to provide accessible information to potential respondents on the proposals, with a web-based questionnaire to seek views.
- 7.3. Respondents were encouraged to provide their feedback via the online feedback form; however, the council welcomed and accepted feedback on the proposals across a range of channels including email; telephone; or in

writing both directly and through our Council one stop shops to ensure that no member of the community was digitally excluded from providing us with their views.

- 7.4. In direct regards to the proposals included within the consultation, respondents were asked *“Do you support or object to our plans to use ANPR enforcement at the specified locations?”*.
- 7.5. Respondents were made aware that Generative Artificial Intelligence (AI) analysis tools were to be used to aid the analysis of data and to ensure personal information was not included. This analysis has been undertaken in accordance with the council’s policy for the use of AI.

8. Quantitative Results

- 8.1. The public consultation generated a total of 359 individual responses; all submitted via the online feedback form.
- 8.2. 205 (57%) of respondents were in support of the proposal, with the remaining 154 (43%) giving their objection.
- 8.3. 349 (97%) of responses were from respondents that declared they live within Bath & North East Somerset.

9. Qualitative Results

- 9.1. Free-text comment boxes were provided within the feedback form to allow respondents to provide further details and comments to support their response to the proposal. Comments were provided in all 359 responses.
- 9.2. Due to the number of individual comments received common themes have been identified using Generative Artificial Intelligence (AI) analysis tools.
- 9.3. The themes identified in the responses of each question are detailed below, with each theme being listed in descending order based on the total number of responses that the theme was related to. As a single response could contain feedback that covered multiple themes, totals across themes therefore exceed the number of responses.

Theme	Support	Object	Total
Non-compliance / illegal turns / enforcement	143	64	207
Safety / road danger	126	55	181

LTN / scheme legitimacy / democracy	27	57	84
Signage / clarity / design issues	49	24	73
Traffic congestion / displacement	14	33	47
Cost / waste of money / priorities	0	35	35
Alternative measures suggested	4	21	25
Pollution / emissions	4	20	24
Privacy / surveillance	1	15	16
Other / unclear	6	15	21

9.4. **Non-Compliance and Enforcement.** Non-compliance with traffic restrictions was the most frequently referenced theme

- 9.4.1. **Support responses** (143 responses) consistently identified widespread non-compliance as a primary issue, with many stating that signage alone is insufficient and that ANPR enforcement is required to ensure adherence to the rules.
- 9.4.2. **Object responses** (64 responses), while acknowledging non-compliance, often interpreted it as evidence that the scheme is poorly designed or lacks public support. Enforcement was therefore viewed as punitive rather than corrective.

9.5. **Safety and Road Danger.** Safety was one of the most frequently cited themes across all responses.

- 9.5.1. **Support responses** (126 responses) commonly referenced observed unsafe behaviour, including illegal turns, near misses, and risks to pedestrians and cyclists. These responses typically framed enforcement as necessary to prevent collisions and improve safety outcomes.
- 9.5.2. **Object responses** (55 responses) also raised safety concerns but tended to attribute them to the **design of the scheme itself**, suggesting that restrictions and routing changes have introduced new hazards or worsened conditions on surrounding roads.
- 9.5.3. Overall, safety is a shared concern across both groups, but with differing interpretations of the underlying cause and appropriate solution.

9.6. **LTN / Scheme Legitimacy and Democratic Process.** Concerns regarding the legitimacy of the scheme were significantly more prevalent among Object responses.

- 9.6.1. **Support responses** (27 responses) generally accepted the scheme and emphasised the need to enforce it in order to achieve its objectives.
- 9.6.2. **Object responses** (57 responses) frequently questioned the decision-making process, citing perceived lack of consultation, disregard for public opinion, and concerns about fairness.
- 9.6.3. These responses suggest that, for a substantial proportion of respondents, objections extend beyond the specific proposal and therefore beyond the scope of this consultation.

9.7. **Signage, Clarity, and Design.** Issues relating to signage, road layout, and scheme clarity were raised by both groups.

- 9.7.1. **Support responses** (49 responses) often stated that signage is clear but being ignored, reinforcing the need for enforcement.
- 9.7.2. **Object responses** (24 responses) highlighted concerns that signage and layout may be confusing or insufficient, raising issues around fairness where drivers may be penalised unintentionally.

9.8. **Traffic congestion / displacement.** Concerns around traffic flow and displacement were more strongly represented within Object responses.

- 9.8.1. **Support responses** (14 responses) occasionally suggested that enforcement could improve traffic flow by reducing rat running and ensuring routes operate as intended.
- 9.8.2. **Object responses** (33 responses) more commonly argued that restrictions have displaced traffic onto other roads, increased journey times, and contributed to congestion elsewhere in the network.
- 9.8.3. This indicates that concerns about traffic are a major reason for opposing the proposal and are consequently outside the scope of this consultation.

9.9. **Cost and Value for Money.** Cost-related concerns were exclusively raised within Object responses.

9.9.1. **Support responses** (0 responses).

9.9.2. **Object responses** (35 responses) expressed the view that ANPR enforcement represents poor value for money and that resources could be more effectively allocated to other priorities, such as road maintenance or alternative interventions.

9.10. **Alternative measures suggested.** Suggestions for alternative approaches were predominantly made by Object respondents.

9.10.1. **Support responses** (4 responses) suggested extending enforcement or applying similar measures to other locations.

9.10.2. **Object responses** (21 responses) included changes to road layout, improved signage, different enforcement approaches, or removal of restrictions.

9.11. **Pollution and Emissions.** Pollution and emissions were referenced by both groups, though more frequently by Object respondents.

9.11.1. **Support responses** (4 responses) linked the scheme to improved air quality and reduced traffic in certain locations.

9.11.2. **Object responses** (20 responses) argued that diverted traffic and longer journeys are likely to increase emissions overall.

9.11.3. This reflects differing perspectives on the net environmental impact of the scheme

9.12. **Privacy and Surveillance.** Privacy concerns were raised primarily by Object respondents.

9.12.1. **Support responses** (1 response) rarely referenced privacy, and where they did, it was typically conditional on proportionate and appropriate use.

9.12.2. **Object responses** (15 responses) referenced issues such as surveillance, data use, and perceived overreach, with some

expressing concern about wider implications beyond traffic management.

9.13. **Other / unclear.** Essentially balanced; short comments that don't reliably indicate the stance of respondents other than their support or objection.

9.13.1. **Support responses** (6 responses)

9.13.2. **Object responses** (15 responses)

9.14. **Officer response to themes and issues raised.**

9.14.1. The schemes that are the subject of this report were developed in consultation with local communities following concerns raised by the local community regarding transport related issues. More detailed information on this engagement and development process is available on the council's website at <https://www.bathnes.gov.uk/lower-lansdown-and-circus>

9.14.2. The objective of this consultation is on the principle of camera enforcement at the locations and restrictions described where non-compliance with restrictions has been identified.

9.14.3. The enforcement of moving traffic restrictions will help the council meet statutory traffic management needs, promote active travel and make our roads safer. It will also reduce congestion at key locations which may also help to reduce carbon emissions and air pollution from transport.

9.14.4. Engineering (physical) measures have been implemented, where practicable, within both schemes to prevent or deter drivers from contravening the restrictions.

9.14.5. Educational measures to encourage compliance have included publicity and engagement to improve awareness.

9.14.6. All restrictions are correctly and appropriately advertised in accordance with the requirements of the Traffic Signs Regulations and General Directions (2016) and additional temporary signs have been used to raise awareness of the changes to restrictions.

9.14.7. In line with Statutory Guidance, a warning notice (with no penalty charge) will be issued for the first contravention at each location during the initial six-month period of enforcement to serve as a further educational measure to improve compliance and embed driver behaviour change. The council takes a proportionate

approach to ensure that no PCN is issued until motorists have been served with the warning.

- 9.14.8. The Traffic Management Act (2004) requires that a 50% discount of the original penalty charge is available for the first 21 days from the date a PCN is served.
- 9.14.9. Every motorist that received a PCN has a legal right of appeal to the council. If this is rejected, they may also appeal (free of charge) directly to an independent adjudicator at the Traffic Penalty Tribunal.
- 9.14.10. The council acknowledges the comparatively high cost of equipment required to enforce moving traffic restrictions. However, as camera enforcement is designed to further encourage compliance where driver behaviour is improved it may be appropriate to pause enforcement action or to relocate the cameras to other locations.
- 9.14.11. Camera enforcement equipment used to capture evidence of traffic contraventions must be legally certified and of a type approved by the Secretary of State to ensure a balance between road safety and privacy rights. Data Protection Impact Assessments are in place to assess and mitigate risks to individual privacy. All captured footage is reviewed by a authorised officer and where this footage does not indicate a contravention it is promptly deleted.