

Review of on-street parking permit charges (2025-26)

Traffic Regulation Order Consultation Outcome Report



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Executive Summary

- a) The proposals contained within this Traffic Regulation Order (TRO) consultation have been developed to support the effective management of resident parking schemes, contribute towards wider transport and air quality objectives, and ensure the long-term financial sustainability of parking services. They have been prepared having regard to the Council's responsibilities under the Road Traffic Regulation Act 1984 and align with broader policy objectives including the Movement Strategy for Bath, Journey to Net Zero, congestion management, pedestrian safety and the efficient use of limited kerb space.
- b) The consultation was undertaken over a 21-day period between 17 October and 7 November 2025 and generated a strong level of public engagement. A total of 279 responses were received through the online questionnaire together with a further 8 responses submitted by email. Respondents provided 696 individual free-text comments which were analysed to identify the key themes and issues raised.
- c) Respondents expressed strong support for tackling air pollution and improving air quality. However, many questioned the extent to which changes to parking permit charges alone would directly improve environmental outcomes. Feedback frequently referred to the importance of wider interventions including congestion reduction, public transport improvements, active travel infrastructure, traffic management measures and cleaner vehicle technologies. A recurring theme throughout the consultation was the need for greater transparency regarding the relationship between parking policies and the environmental outcomes the proposals seek to achieve.
- d) The proposal to increase the cost of resident parking permits attracted opposition, with 61% of respondents not supporting the proposed increase. Respondents raised concerns regarding affordability, cost-of-living pressures, the absence of guaranteed parking availability, the perceived lack of transparency regarding scheme costs and concerns that the proposals were primarily revenue-generating rather than behaviour-changing measures. Respondents also highlighted the importance of maintaining fair access to parking for residents who have limited alternatives to private vehicle use.
- e) Having considered the feedback received, the Council acknowledges the concerns raised regarding affordability, transparency and parking availability. However, the baseline charge for resident parking permits have remained largely unchanged for an extended period and the proposals seek to ensure that resident parking schemes continue to recover their operational costs whilst supporting the effective management of limited kerb space. On balance, the proposed increase in permit charges remains proportionate and appropriate.

- f) Views regarding the proposal to remove the existing 50% discount for electric vehicles were mixed. Whilst 44% of respondents supported the proposal, many respondents expressed concern that removing the discount could reduce incentives for electric vehicle adoption, particularly whilst on-street charging infrastructure remains limited. Others considered the removal of the discount to be fair on the basis that all vehicles occupy road space and generate demand for parking regardless of their propulsion method.
- g) The Council recognises the differing views expressed. Whilst electric vehicles contribute to wider environmental objectives, they also occupy the same kerb space as other vehicles and increasingly tend to be larger and heavier vehicles. Having reviewed the consultation responses, the proposal to remove the 50% discount remains appropriate and is considered consistent with a fair and equitable charging approach.
- h) The proposal to introduce an annual review of permit charges linked to inflation received mixed feedback, with respondents raising concerns around affordability, transparency and the relationship between inflation and the actual costs of operating resident parking schemes. Feedback highlighted the need for any future increases to be proportionate, clearly explained and linked to demonstrable operational costs.
- i) The Council recognises the importance of maintaining transparency and accountability in future charge reviews. However, periodic inflationary adjustments are considered a reasonable mechanism to avoid infrequent but significant increases in permit costs and to help ensure that parking schemes remain financially sustainable. Appropriate discretion will continue to be retained where inflationary movements are exceptionally high or low.
- j) An Equality Impact Assessment has been undertaken alongside the proposals and the consultation feedback has been considered as part of that assessment. Following review of the responses received, no amendments to the proposals are considered necessary as a result of the equality impact assessment process.

Recommendations

- k) After considering the quantitative and qualitative feedback received during the Traffic Regulation Order consultation, it is recommended that the following proposals are implemented as advertised:
 - 1. The proposed increase in resident parking permit charges.
 - 2. The removal of the existing 50% discount for electric vehicle resident parking permits.
 - 3. The introduction of an annual review mechanism for resident parking permit charges linked to inflation, subject to the discretion already set out within the

policy framework.

- l) In reaching this recommendation, regard has been given to the consultation responses, the Equality Impact Assessment, the operational costs of managing resident parking schemes, the need to maintain the effective management of limited kerb space, and the Council's wider transport, environmental and road safety objectives.
- m) Whilst the consultation identified concerns regarding affordability, transparency, parking availability and electric vehicle incentives, the overall assessment is that the proposals remain proportionate, justified and capable of contributing towards the sustainable operation of resident parking schemes. It is therefore recommended that the proposals proceed to implementation without amendment.

Contents

Review of on-street parking permit charges (2025-26)	1
Traffic Regulation Order Consultation Outcome Report	1
Executive Summary	3
Recommendations	4
1 Introduction	8
1.1 Background	8
1.2 Purpose of Consultation	8
1.3 20% increase to baseline permit charge	9
1.4 Removal of the 50% EV discount	10
1.5 Index linked permit review	10
2 Public Consultation	12
3 Consultation Response	14
3.1 Feedback	14
3.2 Equalities monitoring	14
3.3 Respondent distribution	15
3.4 Quantitative Results	16
3.5 Qualitative Results	20
3.5.6 How concerned are you about air pollution and the impacts on people's health?	20
3.5.7 In your opinion, how important is tackling and improving air quality?	23
3.5.8 To what extent do you support or oppose our proposals to increase the cost of on-street permits?	25
3.5.9 To what extent do you support or oppose our proposals to remove the 50% discount for electric vehicles?	29
3.5.10 To what extent do you support or oppose our proposals to introduce an annual review of permit charges linked to inflation?	32
4 Discussion of Results	36
4.1 Discussion of qualitative feedback	36
4.2 Discussion of quantitative feedback	37
4.3 How concerned are you about air pollution and the impacts on people's health?	37
4.4 In your opinion, how important is tackling and improving air quality?	38
4.5 To what extent do you support or oppose our proposals to increase the cost of on-street permits?	40

4.6	To what extent do you support or oppose our proposals to remove the 50% discount for electric vehicles?	43
4.7	To what extent do you support or oppose our proposals to introduce an annual review of permit charges linked to inflation?	44
Appendix A – Details of proposed charges		47
1.	Proposed baseline charge	47
2.	Proposed Business permit charge	47
3.	Emission-based resident' permits	48

Figure 1 - Respondent age distribution compared to 2024 mid year ONS data for Bath & North East Somerset	14
Figure 2 - Respondents declared disability status.....	15
Figure 3 - Distribution of respondent's geographical location, as identified by declared postcode.....	16
Figure 4 - Respondents view on Air Pollution and the impacts on people's health.....	17
Figure 5 - Respondents view on importance of tackling and improving air quality.....	17
Figure 6 - Respondents view on on-street permit price increase proposals	18
Figure 7 - Respondents view on removing 50% discount for electric vehicles.	18
Figure 8 - Respondents view on an annual review of permit charges linked to inflation	19

1 Introduction

1.1 Background

- 1.1.1 In 2022 the council implemented an emissions-based pricing policy for resident parking permits, its first price review since 2013. This review linked permit charges to the vehicle's emissions, with more polluting vehicles pay increasingly more than the baseline charge.
- 1.1.2 This policy was developed to improve air quality through a major shift to sustainable transport, walking and cycling and incentives to reduce the use of more polluting vehicles to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution. This approach also aimed to facilitate the achievement of strategic outcomes of local transport policy by influencing behaviour change and reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods and align with the Council policy on Liveable Neighbourhoods and the climate and nature emergency.
- 1.1.3 The baseline permit charge of £100 has therefore remained unchanged despite inflationary pressures for over ten years. During this period, the costs associated with operating residents' parking zones (RPZs) — including administration, maintenance, and enforcement — have increased significantly. As a result, a funding gap has emerged, creating a risk that the costs of RPZs are subsidised by all council taxpayers, including those who do not own or cannot afford a car. This position is not consistent with the Council's Residents' Parking Scheme Strategy, which requires schemes to be financially self-supporting.
- 1.1.4 To address this, proposals have been developed in accordance with the requirements of section 122 of the Road Traffic Regulation Act (1984) to ensure that RPZs remain fair, proportionate, and financially sustainable.
- 1.1.5 Collectively, the proposals support wider Council objectives by helping to:
- Improve road and pedestrian safety
 - Reduce the number of polluting vehicles in historic urban centres
 - Lower public health risks associated with air pollution
 - Encourage increased walking, cycling, and public transport use

1.2 Purpose of Consultation

- 1.2.1 The purpose of the consultation was to seek views from residents, businesses, and other stakeholders on proposed changes to Residents'

Parking Zones (RPZs), including permit charges and related policy adjustments as part of the statutory process to vary our Traffic Regulation Orders (TRO).

- 1.2.2 Feedback received through the consultation will be considered alongside the Council's statutory duties, the Residents' Parking Scheme Strategy, and wider transport, environmental, and public health objectives, to inform recommendations on whether and how the proposals should be implemented.
- 1.2.3 An outline of the proposals as included within the public consultation is set out in this section. More details on any charges and what a customer might be required to pay for all proposals included within this report, are available within Appendix A.

1.3 20% increase to baseline permit charge

- 1.3.1 We are proposing that there is an increase in the baseline charge for on-street parking permits from £100 to £120 for an annual permit (equivalent to 20%), with corresponding increases across bands where permit charges are emission based.
- 1.3.2 The baseline permit charge is the historic £100 charge for a first permit and the charge for less polluting vehicles within the emission-based charging policy. All permits linked to the baseline charge (including, but not exclusively, Medical and Social Care Permits and GP Permits) will be uplifted accordingly.
- 1.3.3 Where an on-street permit charge does not align to the £100 baseline charge, for example with Business permits, the charge will be increased by an equivalent 20%.
- 1.3.4 The councils published on-street parking permit terms and conditions (paragraph 3.11 of the terms and conditions available online at <https://www.bathnes.gov.uk/street-parking-permits-terms-and-conditions>) states that "*the charge paid for a permit covers the membership, administration, maintenance and enforcement of permit schemes*".
- 1.3.5 The councils Residents Parking Scheme strategy (<https://www.bathnes.gov.uk/document-and-policy-library/residents-parking-scheme-strategy>) states that the council must ensure that its residents parking schemes are self-financing to ensure that operating costs are not subsidised by other areas of the Council.
- 1.3.6 Analysis of the costs for the administration, maintenance and enforcement of resident parking schemes in 2024/25 indicate a shortfall of £168k against income generated from the sale of on street parking permits. Comparative

data for 2025/26 is not currently available.

- 1.3.7 An increased baseline charge from £100 to £120 (a 20% increase) will also proportionality increase the cost of a permit for more polluting vehicles; further helping to encourage behaviour change and reduce air pollution caused by private vehicles, whilst also reducing the emission that cause climate change.

1.4 Removal of the 50% EV discount

- 1.4.1 We are proposing that a permit for an EV vehicle costs the same as the baseline charge.
- 1.4.2 Permits issued to EV vehicles currently comprise 3% of all active permits. A 50% discount on the permit price may be a disincentive to promoting the uptake of EV vehicles. It's noted that aligning EV permit costs to the same as the least polluting vehicles is a more equitable approach and ensures a fairer contribution to operational costs of residents parking schemes.
- 1.4.3 The relatively high cost of EVs means this discount has a disproportionate impact to householders on lower incomes whilst the comparatively small discount is unlikely to be a major factor influencing an EV purchase.

1.5 Index linked annual permit charge review

- 1.5.1 We propose to introduce an annual review of permit charges, linked to inflation, into the Fees and Charges process as part of the council's annual budget setting, agreed by Full Council, from April 2026.
 - 1.5.2 For comparative purposes, the equivalent costs in June 2025 of a £100 permit in 2013 uplift by inflation measured by the Consumer Price Index (CPI) is £140.51 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>), an increase of 41%.
 - 1.5.3 The council's on-street TROs will continue to detail the structure of emission-based charges and how each band, in the case of emission-based charges, is calculated from the baseline charge.
 - 1.5.4 Any charges uplifted by inflation in this way (rounded to the nearest whole numbers that maintain proportionality between different permit types) will be published within the councils Fees and Charges and will take precedence over charges included within the TRO, which is proposed to be varied as part of this review.
 - 1.5.5 The council may increase these charges each year by a percentage rise not exceeding inflation, linked to the Consumer Price Index (CPI), rounded to the nearest whole numbers that maintain proportionality between different permit
- Review of on-street parking permit charges (2025-26)

types. The inflationary index applied to the charge will be based on the percentage change between the month the new charges are proposed and the equivalent figure 12 months prior. Any proposed increase that exceeds the inflationary index would be subject to further public engagement to allow feedback to be considered.

- 1.5.6 Any increase on the previous year's charge will be proposed and formalised as part of the annual Fees and Charges setting process which is consulted upon and adopted by Full Council as part of the council's budget setting process each year. These charges will be published on the council's website and be readily accessible.
- 1.5.7 In times of exceptionally low or exceptionally high inflation, the council will reserve the right not to apply an inflationary change. This may also be based on an assessment of whether the cost of implementation would outweigh the financial benefit of the increase.

2 Public Consultation

- 2.1.1 A public consultation was held to advertise the proposals and facilitate public feedback over a 21-day period between 17 October 2025 and 7 November 2025 and publicised digitally via the Council's website; press release; and direct email contact to key stakeholders.
- 2.1.2 The council took a proactive approach to engagement and issued direct communications (where contact details were available) to many groups including:
- a) 10,507 emails and 28 SMS messages sent to customers that had an active permit account or had recently used the MiPermit service to pay for parking at locations impacted by the proposals.
 - b) A Service header, or banner, placed across relevant Council and MiPermit service pages, informing and directing page visitors to the consultation.
- 2.1.3 A dedicated web page was created on the council's website to provide accessible information to potential respondents on the proposals.
- 2.1.4 A dedicated mailbox was made available for stakeholders to use where they required clarification on any element of the proposals.
- 2.1.5 The council is legally required to pay 'due regard' to people with protected characteristics as defined under the Equality Act (2010) and the Public Sector Equality Act (2023). Equality impact assessments were undertaken prior to public consultation, and these were published within the online documentation.
- 2.1.6 A web-based questionnaire was developed to seek the views from all stakeholders on the proposals. This feedback form was designed to ensure the questions remained neutral so that responses reflect respondents own views.
- 2.1.7 Due to a range of proposals being included within the public consultation the feedback form was separated into specific questions designed to help respondents provide exact feedback for each proposal as well as any additional information they felt was appropriate.
- 2.1.8 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.

2.1.9 The feedback form was designed to collect both quantitative and qualitative data. Quantitative data was gathered through single answer questions producing numerical results. Qualitative data was gathered through additional comments to support the respondent's choice or add additional comment.

2.1.10 In direct regards to the proposals included within the consultation, respondents were asked:

- a) How concerned are you about air pollution and the impacts on people's health?
- b) In your opinion, how important is tackling and improving air quality?
- c) To what extent do you support or oppose our proposals to increase the cost of on street permits?
- d) To what extent do you support or oppose our proposals to remove the 50% discount for electric vehicles?
- e) To what extent do you support or oppose our proposals to introduce an annual review of permit charges linked to inflation?

2.1.11 Respondents were asked for their age (within defined ranges) and if they considered themselves to be disabled or have a blue badge. The purpose of this was to determine if there was any variability, and therefore potential impact, across these different groups.

2.1.12 Respondents were asked to provide their postcode to allow identification of Bath & North East Somerset residents and those that travel to the Local Authority area.

2.1.13 Respondents were made aware that was to 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.

3 Consultation Response

3.1 Feedback

3.1.1 The public consultation received a total of 279 individual responses which were submitted via the online consultation portal and an additional 8 individual responses captured from email.

3.2 Equalities monitoring

3.2.1 Respondents to the consultation were invited to provide equalities information in relation to the protected characteristics of age and disability. A summary of the responses is presented in Figure 1 and Figure 2.

3.2.2 Figure 1 illustrates the age profile of consultation respondents compared with the 2024 Office for National Statistics mid-year population estimates for Bath and North East Somerset.

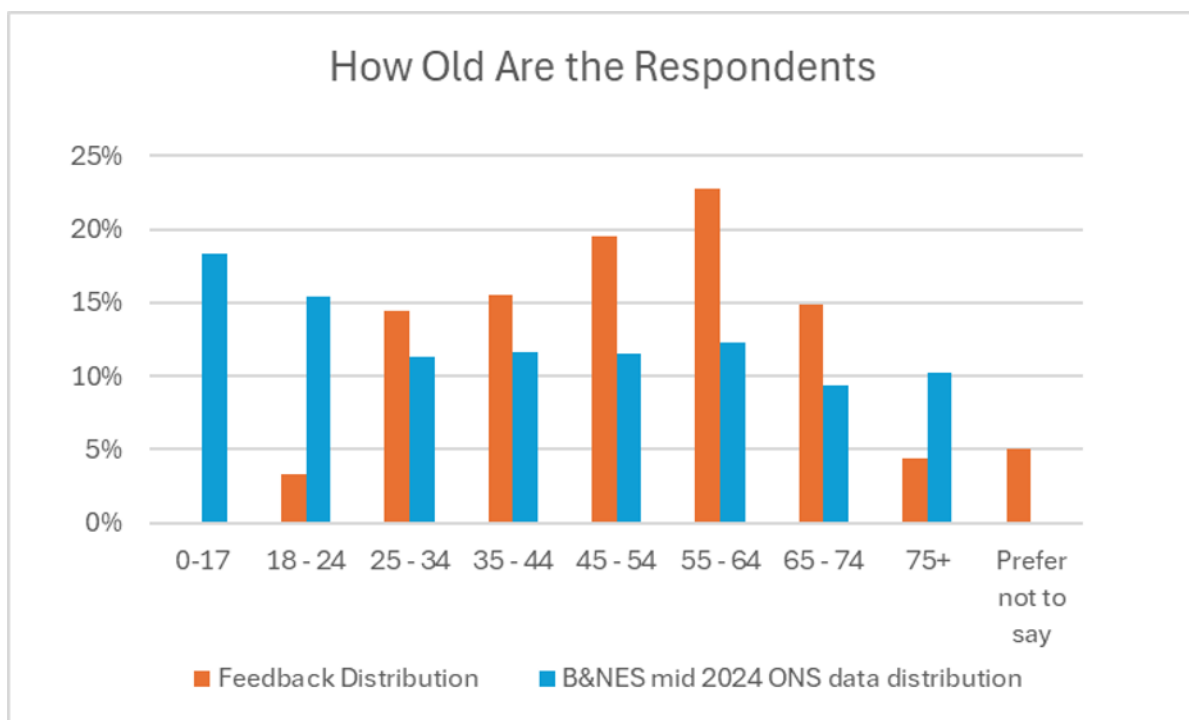


Figure 1 - Respondent age distribution compared to 2024 mid year ONS data for Bath & North East Somerset

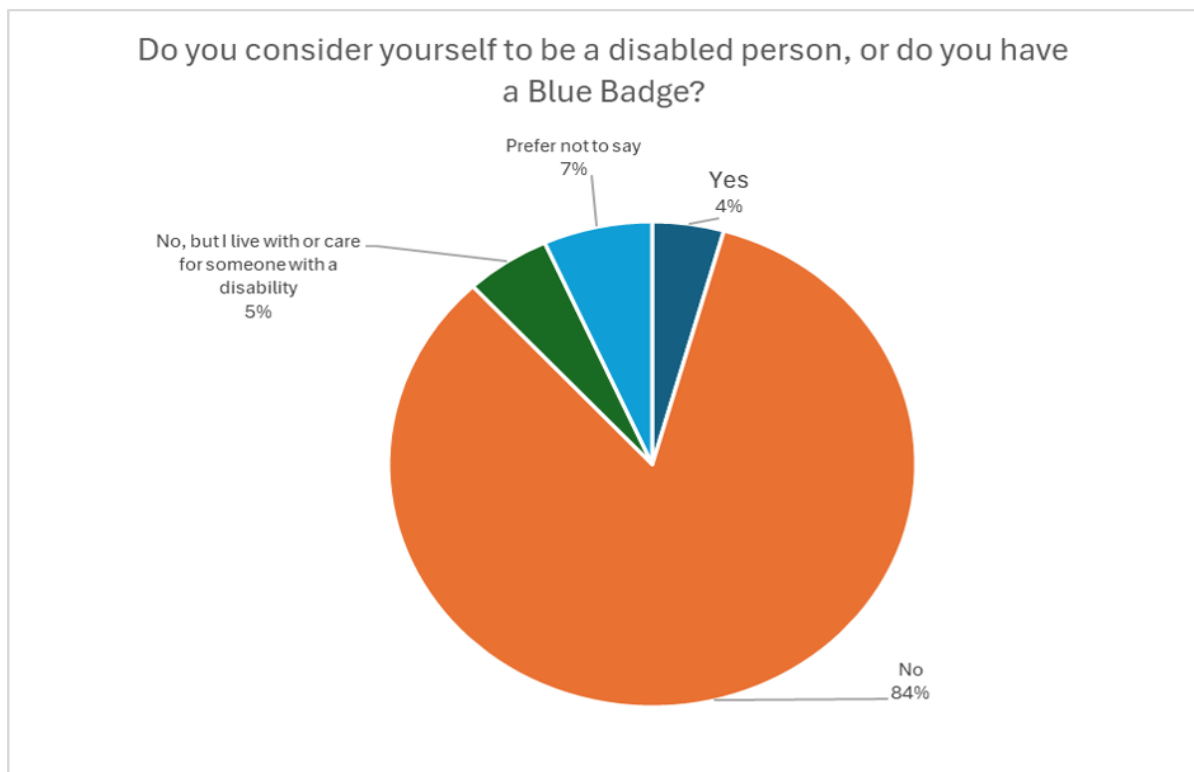


Figure 2 - Respondents declared disability status

3.3 Respondent distribution

- 3.3.1 Of the responses received via the online questionnaire, 79% (222 responses) were submitted by individuals identified as residing within the Bath and North East Somerset area.
- 3.3.2 Figure 3 illustrates the geographic distribution of consultation responses for which a location could be broadly identified, including responses attributed at ward level within Bath and North East Somerset.

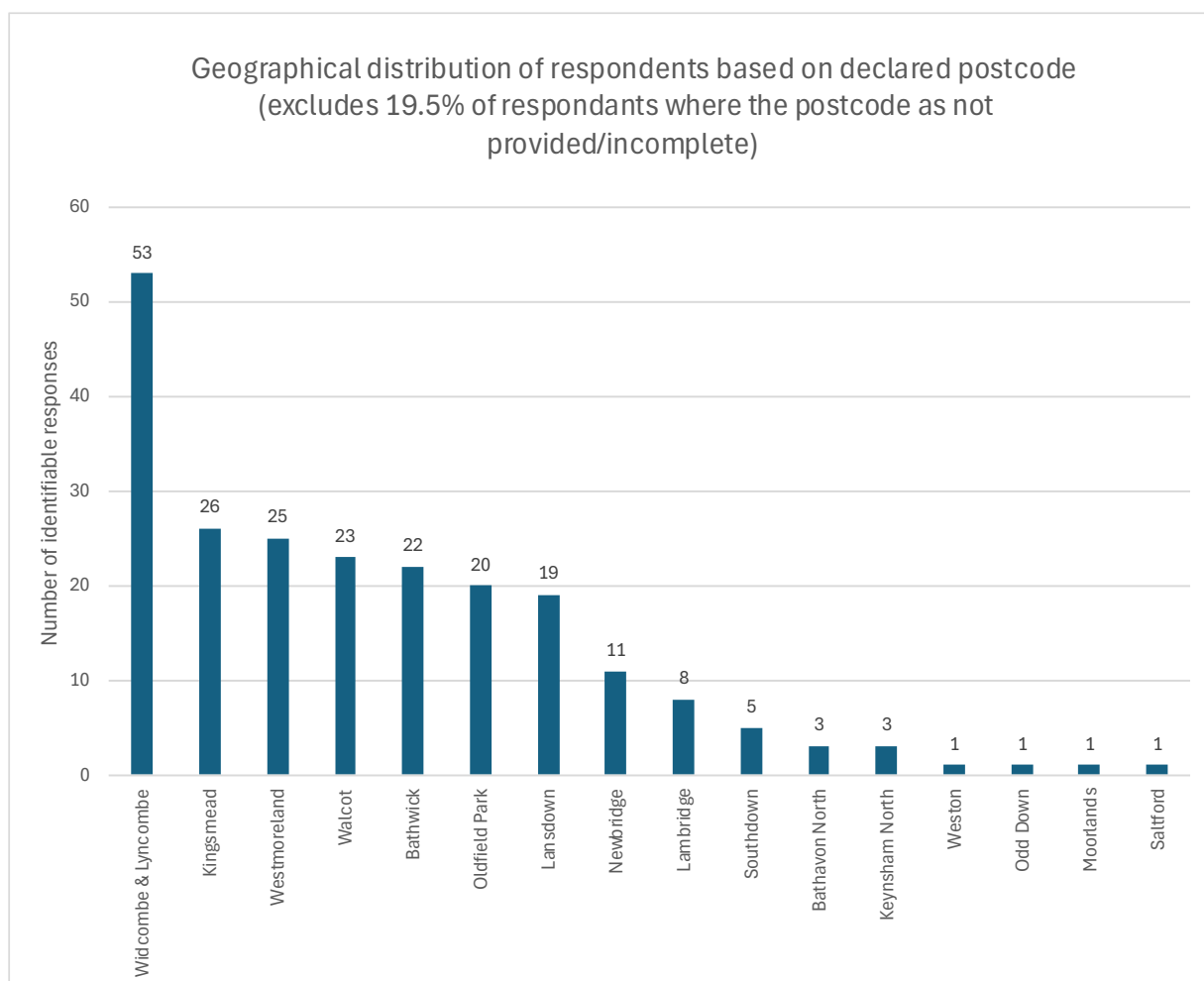


Figure 3 - Distribution of respondent's geographical location, as identified by declared postcode

3.4 Quantitative Results

- 3.4.1 Where respondents indicated that a question was not applicable to them, those responses have been excluded from the relevant analysis.
- 3.4.2 Analysis of responses to the question of how concerned they are about air pollution and the impacts on people's health indicates that 18% are not concerned at all on air pollution and the impacts on people's health.

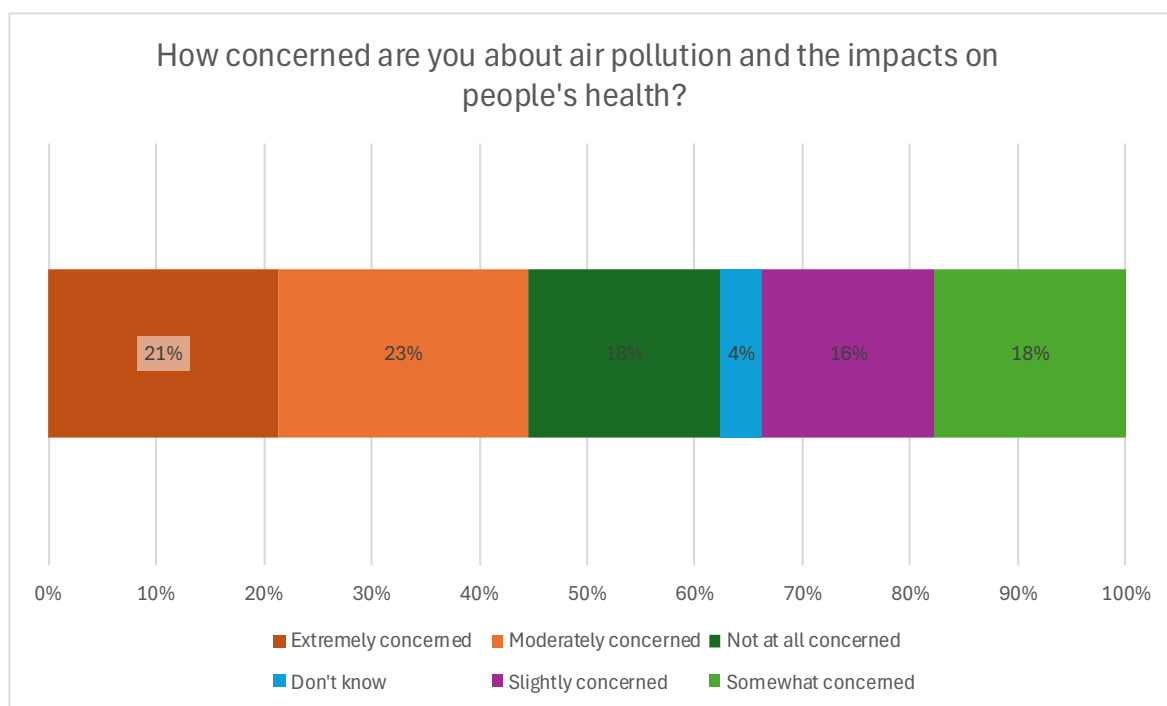


Figure 4 - Respondents view on Air Pollution and the impacts on people's health

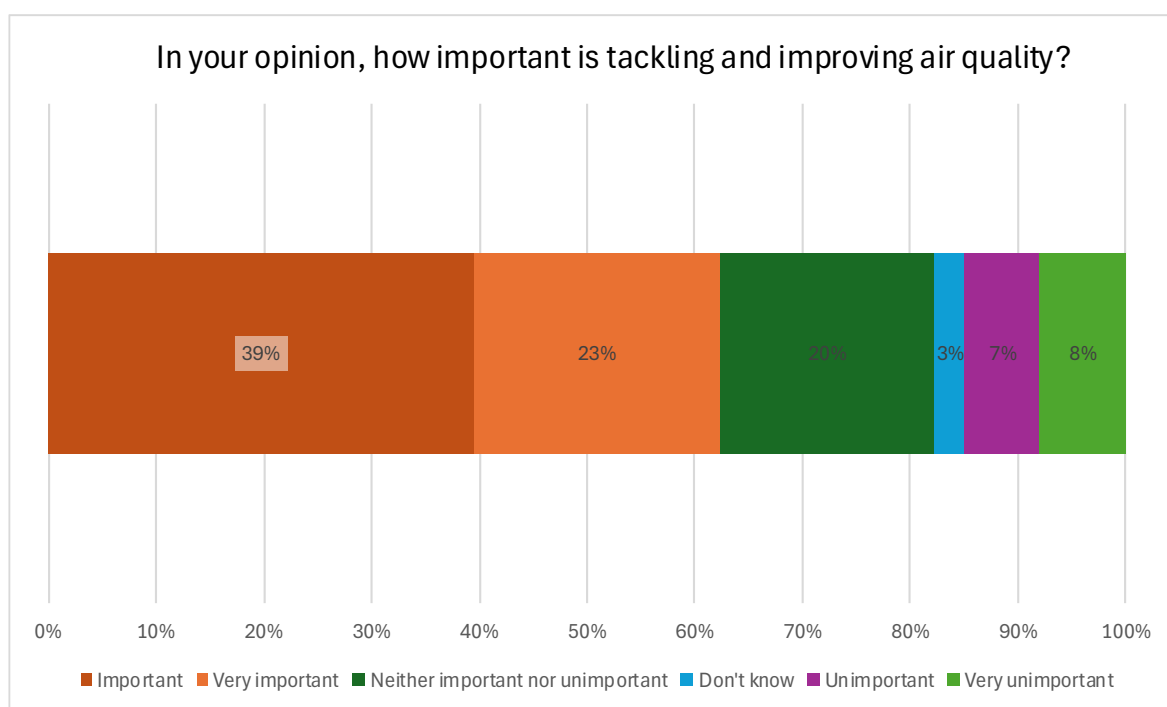


Figure 5 - Respondents view on importance of tackling and improving air quality.

3.4.3 When questioned around the support or opposition of raising the cost of on street permits, 61% fully opposed a price increase.

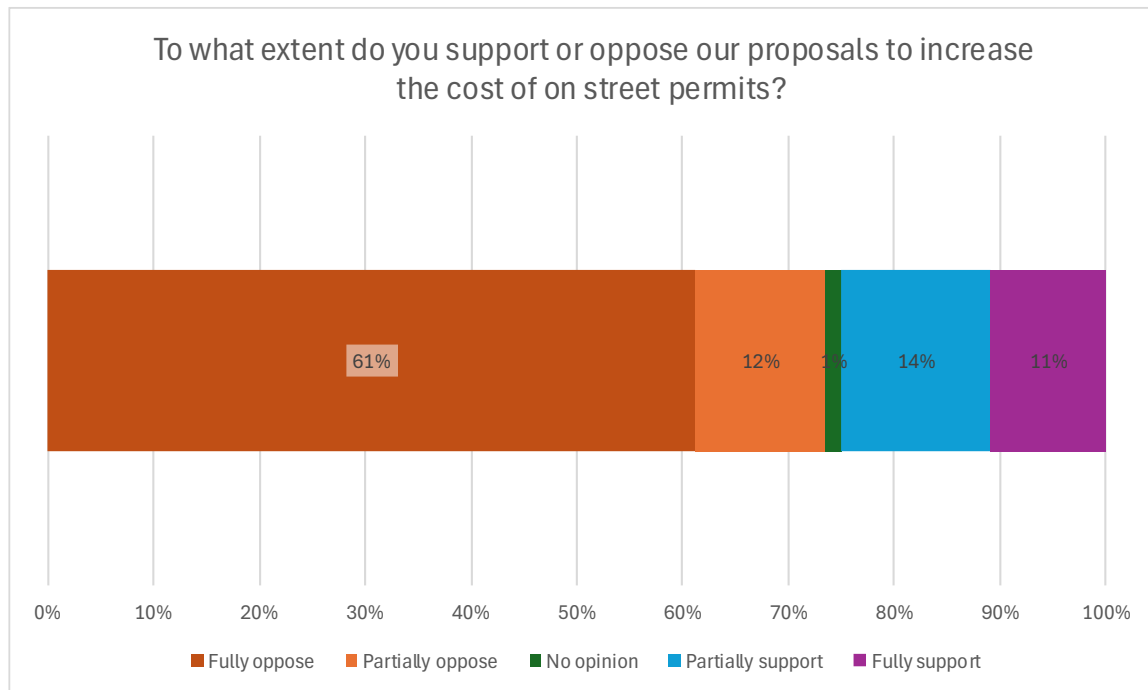


Figure 6 - Respondents view on on-street permit price increase proposals

3.4.4 44% respondents were in support of removing the 50% discount for electric vehicles.

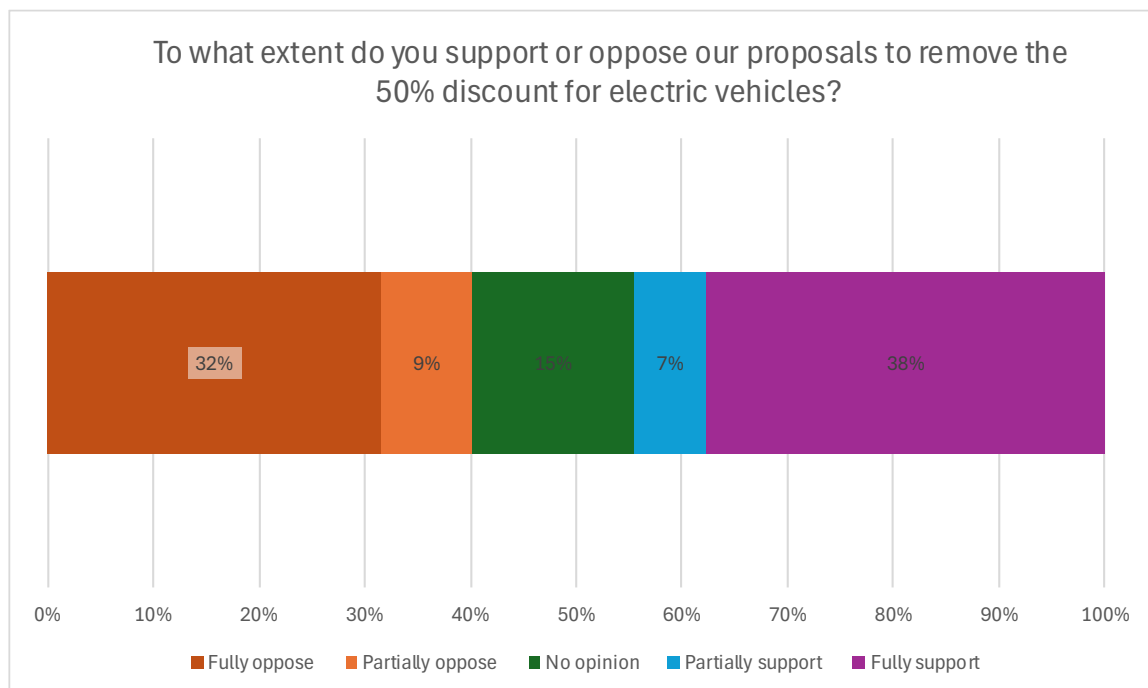


Figure 7 - Respondents view on removing 50% discount for electric vehicles.

3.4.5 36% of respondents were in support of an annual review of permit charges linked to inflation, compared to 59% who were opposed.

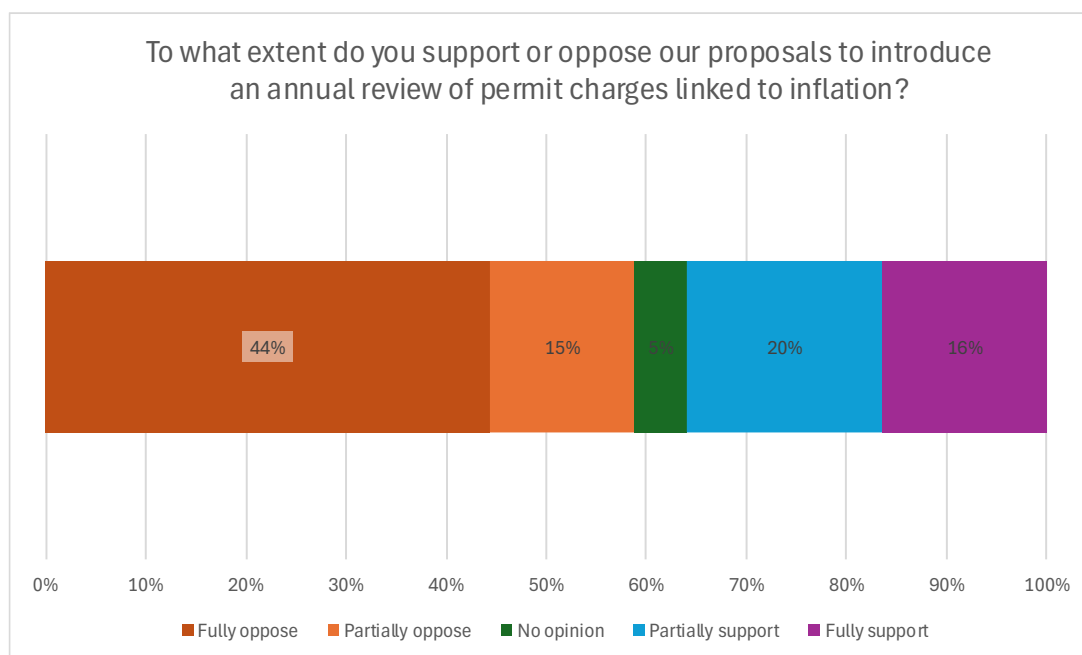


Figure 8 - Respondents view on an annual review of permit charges linked to inflation

3.5 Qualitative Results

- 3.5.1 Free-text comment boxes were provided within the feedback form to allow respondents to provide further details and comment to support their response to the proposal.
- 3.5.2 A total of 696 separate free text comments were received across the feedback, including within the online feedback form or email.
- 3.5.3 Due to the number of individual comments common themes have been identified using Generative Artificial Intelligence (AI) analysis tools.
- 3.5.4 The themes identified in the responses of each question are detailed in this section, with each theme being listed in descending order based on the number of responses that the theme was related to.
- 3.5.5 Emails were analysed separately as the comments could not be aligned to specific questions within the feedback form.

3.5.6 How concerned are you about air pollution and the impacts on people's health?

a) **Traffic Flow and Congestion Management** (23 respondents, 20%):

Respondents underline that traffic flow and congestion management are fundamental to air quality and health concerns in Bath. Visitor and commuter charges may reduce city-centre traffic without penalising local residents. Night-time scheduling of road works could minimise peak-hour queuing and associated emissions. Weight restrictions on key bridges have reduced lorry crossings and improved air quality. Enforcement at signalised junctions can cause jams and increase idling pollution. Historic streets are ill-equipped for modern vehicle volumes. Uncontrolled work van parking is exacerbating congestion and reducing resident spaces. Right-turn restrictions and low-traffic neighbourhoods may divert queues and raise pollution on alternative routes. Cancellation of a bypass proposal is viewed as a missed chance to divert through-traffic away from the city. Comprehensive 20 mph zones and blocked escape routes risk increasing stationary traffic and emissions. Existing traffic management systems have failed to prevent junctional queues that generate pollution hotspots. Parking queues in Walcot Street and Southgate contribute to extended idling in the city centre. Through-traffic should be routed away from Bath to lower emissions. Parking adjacent to schools causes constant engine idling and localised air pollution. Concentrated traffic funnels onto Lansdown roads, worsening pollution levels. Keeping traffic moving is essential to prevent queues and reduce emissions.

City-centre air quality concerns focus on slow-moved or stationary traffic build-up.

b) Vehicle Emission Standards and Charges (19 respondents, 17%):

Respondents highlighted concerns over fairness, effectiveness and transparency in vehicle emission standards and charges. Removal of the 50% permit discount for electric vehicles is criticised as unfair, especially without environmental justification for increased costs. Emission-based levies could require baselining and publication of air quality data to demonstrate improvements. Permit charge hikes would not directly remove high-polluting vehicles, with diesel cars on short trips cited as key contributors and potential targets for green air zones. Historic vehicles and larger family cars may need exemptions to prevent disproportionate financial burden. A 20% uplift on baseline permit charges, tied to emissions, could incentivise smaller, lower-emission vehicles. Stronger measures are suggested for diesel buses and commercial vehicles, alongside expansion of low-emission zones. Control zones have already produced reported benefits, but doubts persist over their impact on health-related pollution levels.

c) Residential Parking Permit Pricing and Discounts (11 respondents, 10%):

Residential parking permit price increases are considered unjustified by respondents due to a lack of environmental rationale. Increases in permit fees may not reduce pollution-related illness because high-emission vehicles could remain unaffected. Electric vehicles may warrant discounted permit charges rather than surcharges. Vehicles over 40 years old could be exempt from any pollution-based parking levy. A shortfall in funding is cited as the primary reason for raising the base permit fee. Higher charges for electric cars may undermine the stated clean air objective. Additional costs may fail to alter driving habits, instead yielding revenue without environmental benefit. Absence of published air quality data from before residential permit zones hinders assessment of any improvement. Inclusion of pre-zone air quality metrics and evidence of charge impact could better inform the consultation. Permit fee increases are judged unlikely to address air pollution or its health consequences.

d) Road Infrastructure and Bypass Schemes (8 respondents, 7%):

Road infrastructure and bypass schemes are highlighted as central to managing traffic flows and air quality around Bath. Rerouting cars away from central streets has forced traffic past residential properties, worsening local traffic conditions. Diversion of heavy goods vehicles away from the city centre has reduced lorry crossings at Cleveland Bridge and may have lowered air pollution. Main route traffic continues to pass through Bath en route to other destinations, maintaining emissions within the city. Traffic management changes have funnelled significant volumes onto Lansdown, increasing pollution in that area. The present restricted road system in Bath is described as already addressing air quality issues. Council rejection of a proposed

bypass prevented a potential large reduction in city centre traffic. Lack of a bypass is characterised as punishing those who need to use cars for travel.

- e) **Public Transport and Park & Ride Provision** (5 respondents, 4%):
Respondents consider enhancing public transport and park & ride provision essential to reducing air pollution and protecting health. Encouragement of use and maintenance of existing vehicles, promotion of car sharing and improved public transport infrastructure could have a greater and fairer impact on pollution reduction than imposing further financial burdens on residents. Out-of-date buses operating with low passenger loads are identified as major polluters on Bath's roads. All buses operating in Bath should be electric. Lowering fares for working people could encourage greater use of public transport. A park & ride facility at Oldfield Park station or improved bus connections to the station could alleviate local parking pressures and generate support. Workers beyond current park & ride catchments could be allowed to park within a reasonable distance of their workplaces.
- f) **Air Quality Monitoring and Data Transparency** (3 respondents, 3%):
Respondents emphasised the need for improved monitoring and transparency of air quality data. Air pollution levels in residential streets around Bath are either unrecorded or minimal. Historical air quality data prior to the introduction of the resident parking zone (RPZ) is not published alongside evidence of subsequent improvements attributed to the charges. Regular air quality testing could be undertaken, with results communicated directly to households. Publication of pre- and post-RPZ data may enable residents to evaluate the scheme's impact on air quality.
- g) **Active Travel Infrastructure and School Routes** (2 respondents, 2%):
Respondents note that heavy traffic in Bath's centre and the absence of secure cycleways may discourage active travel. A request is made for improved air quality along school walking routes to safeguard children's health.
- h) **Domestic Heating and Wood Burning Controls** (1 respondent, 1%):
The respondent emphasises that effective air pollution control requires addressing both traffic emissions and domestic wood burning. Traffic and wood burning pollution sources must both be addressed; they cannot be tackled independently. Air quality concerns arise not only from traffic but also from wood burning in homes.
- i) **Other** (101 respondents, 88%):
Views under 'Other' focus on the link between air pollution concerns and proposed changes to parking arrangements. Linking concerns about air pollution to a resident parking scheme may appear unrelated and could be used to justify increased permit charges. Local air quality in Bath is described as good or improving, with measurements below national limits and a falling

trend. The transition to electric vehicles could reduce emissions further, although accessible charging infrastructure may be lacking. Diesel vehicles, log burners and delivery lorries are identified as persistent sources of particulate pollution that could harm people with respiratory conditions. Asthma symptoms and concerns for children's exposure on busy streets are cited as reasons to maintain low pollution levels. Evidence on current pollution levels and more direct questions on cost, effectiveness and the economy are requested. Balancing air quality improvement with economic accessibility, essential car use and public transport is considered necessary for a workable solution.

3.5.7 In your opinion, how important is tackling and improving air quality?

a) **Traffic Flow and Congestion Management** (12 respondents, 13%):

Respondents emphasise that improving air quality depends on reducing congestion through traffic flow management. Lower speed limits may increase emissions by forcing lower-gear driving. Blocked roads and excessive traffic lights can create standstills, prolonging idling and detours that raise pollution per mile travelled. Stop-start journeys may generate extra emissions, especially where road capacity has been cut. Inner-city parking restrictions and no-go zones could force drivers to circle in search of spaces, increasing vehicle queues. Concentrating through-traffic on George Street, Lansdown and London Road may worsen central pollution, suggesting that a bypass could relieve the city core. Unnecessary bus circuits and tourist coaches entering the centre have been cited as adding needless traffic, and larger vehicles such as SUVs may exacerbate congestion by occupying more road space. Park-and-ride proposals could divert visitor traffic from the centre. Reducing the queue of cars seeking central parking is advocated before implementing further resident penalties.

b) **Parking Management and Permit Charges** (11 respondents, 12%):

Respondents view the council's increase in on-street parking permit charges as a cash-generation exercise unrelated to air quality improvements. Inflated parking fees penalise residents without yielding meaningful emissions reductions. Polluting vehicles that transit permit zones without permits continue to contribute to poor air quality. Proper enforcement of existing permit areas could yield revenue from illegally parked vehicles. More finely honed strategies may prove more effective at improving air quality than raising permit fees. Pricing schemes can impose financial strain on those reliant on vehicles for work, care responsibilities or daily necessities. Directing non-residents to public car parks could alleviate local pollution hotspots. Publication of evidence demonstrating air quality benefits would be necessary to justify higher permit charges. Completely pricing vehicles out risks depopulating high streets and city centres.

c) **Vehicle Emission Standards and Clean Air Zones** (8 respondents, 9%):

Respondents present diverse perspectives on vehicle emission standards and Clean Air Zones. Charging older diesel vehicles may align with schemes such as Bristol's approach to deter high-polluting cars. Levying extra charges or expanded RPZs is criticised as an unfair justification for broader price rises. Introducing lead-free petrol is cited as a successful prior measure to improve air quality. Clean Air Zones could displace pollution to neighbouring areas rather than eliminate it. Banning diesel vehicles from city centres except for emergency services is proposed as a stricter alternative. Existing CAZs are described as effectively excluding major polluters. Restricting entry via CAZs may favour wealthier motorists who can afford newer vehicles. Traffic congestion within CAZ boundaries could negate anticipated air quality benefits. Encouraging zero-emission vehicles is viewed as integral to promoting cleaner air.

d) Public Transport Provision and Electrification (7 respondents, 8%):

Respondents consider public transport provision and electrification essential for improving air quality. Visitors could be encouraged to use park-and-ride facilities. Real progress on air quality could come only from an improved public transport network. Empty bus services should be eliminated to ensure better resource use. A reliable and decent public transport system is cited as a prerequisite for reducing emissions. Without enhancements to public transport, on-street car numbers would remain unchanged. Entry of large tourist buses into the city centre should be restricted. Encouraging better public transport could promote cleaner air. Bus fleets could be electrified to further reduce pollution.

e) Transition to Electric Vehicles (5 respondents, 6%):

Respondents link the transition to electric vehicles directly to air quality improvement. Electric buses are cited as an extension of this shift. Air quality may naturally improve as vehicle fleets become electric. Rising numbers of electric cars may progressively reduce CO₂ emissions week by week. Reducing emissions through electric vehicles is identified as the best way to tackle and improve air quality. Encouraging zero emission vehicles may form part of a duty to promote cleaner air.

f) Active Travel Infrastructure (3 respondents, 3%):

Respondents highlight shortcomings in Active Travel Infrastructure. Cycling and wheeling options may be impractical for certain groups. An obsession with air quality could distract from addressing physical hazards arising from poorly maintained street and pavement infrastructure. High traffic volumes in the centre and a lack of secure cycle ways in and around Bath may discourage alternative transport.

g) Domestic and Non-Road Emissions Control (3 respondents, 3%):

Domestic and non-road emissions control is viewed as vital for improving air quality by curbing home-based pollution sources. Log burning may significantly contribute to particulate pollution. Home-based emissions control

could be improved through council measures targeting domestic fuel use. Air quality efforts must extend beyond vehicles to include stricter regulation of wood burning.

h) Coach and Heavy Vehicle Access Controls (2 respondents, 2%):

Respondents express concerns about air pollution from large tourist coaches entering the city centre. Huge tourist buses are described as contributing to poor air quality and calls are made for their access to be restricted. Uncertainty is raised over how increased charges on residents would relate to coach entry, particularly for fundraising fairs. Coaches running virtually empty are highlighted as unnecessary contributors to emissions, which could be reduced by limiting such journeys.

i) Other (65 respondents, 73%):

Tackling and improving air quality is important for public health and may reduce conditions such as asthma. However, current air quality in Bath is regarded as acceptable by some and would continue to improve without additional measures. The council's proposed measures may serve fiscal aims under the guise of environmental policy and could unfairly target residents rather than visitors. Question wording may appear biased or manipulative, suggesting it justifies a residents' parking scheme or revenue-raising. Air pollution is seen as a broader issue involving vehicles, construction, heavy goods delivery, water pollution and microplastics. Effective action may require a combined approach across all sectors, support for cleaner vehicles, encouragement of active travel and honest implementation that avoids extra burdens on taxpayers. Cost and inconvenience could outweigh marginal environmental benefits unless measures remain fair, transparent and sensitive to local economic and social priorities such as housing, healthcare and infrastructure. Priority for air quality may be questioned in light of other urgent concerns including homelessness, water quality, education and cost of living.

3.5.8 To what extent do you support or oppose our proposals to increase the cost of on-street permits?

a) Affordability for low-income and multi-car households (31 respondents, 16%):

Respondents highlight that increased on-street permit charges would present a significant financial burden for low-income and multi-car households. Increased fees would penalise families without off-street parking and could deepen existing cost-of-living pressures. Permit cost rises may act as a de facto tax on those least able to pay and could push households further into debt or poverty. Higher charges could disproportionately affect those relying on older or lower-emission vehicles that they cannot afford to replace. A uniform uplift for first and second permits may fail to target higher usage and could unfairly burden single-car households. A scaled approach, aligning the first permit with inflation and applying larger uplifts for additional vehicles,

could address concerns about multi-car ownership while moderating impact on lower-income drivers. Silence on support measures or alternative travel options may leave those unable to afford a permit without recourse. Equitable funding solutions could better balance revenue needs with protection for financially vulnerable residents.

b) Emissions-based permit pricing (26 respondents, 14%):

Respondents stress that emissions-based permit pricing should maintain a substantial discount for battery electric vehicles as a vital incentive to tackle the climate crisis and improve air quality. Removing the 50% discount for battery electric vehicle permits would send the wrong message about pollution reduction efforts. Focusing solely on CO₂ emissions could overlook particulate matter and thus fail to address air quality concerns. Fully electric vehicles emit no pollutants when stationary, yet the policy applies an emissions surcharge even without active emissions. Pricing for more polluting or larger vehicles could be raised substantially to finance incentives for zero-emission vehicles. Permit fee changes may require justification through evidence of rising operational costs or clear policy objectives such as emissions reduction or congestion management. Charges based on emissions or pollutants could account for mileage as the largest variable affecting overall emissions. Equity considerations indicate that low-income residents without access to newer vehicles might face disproportionate costs under the policy. However, increasing costs for the most polluting and larger vehicles could be acceptable if discounts for battery electric vehicles are retained.

c) Permit enforcement and compliance (26 respondents, 14%):

Respondents describe enforcement of on-street permits as inadequate, which undermines the justification for the policy to increase permit costs. Inadequate wardens and low fines are said to allow illegal parking, devalue permits and exacerbate evening and overnight shortages. Increasing patrols and raising penalties is seen as necessary to deter non-compliance and to make higher fees more acceptable. Parking cameras are proposed to monitor off-peak abuse, accompanied by calls for clearer proof-of-residence criteria to prioritise genuine local residents. Requests for regular reporting on enforcement frequency and fine revenues reflect scepticism about the need for higher charges to cover static administration costs. Efficiency improvements or alternative funding sources are suggested as fairer means to address cost shortfalls without penalising compliant households. However, conditional support is offered if extra income is ring-fenced for consistent permit checks and enforcement.

d) Inflation and automatic fee indexation (21 respondents, 11%):

Respondents expressed varied views on a policy proposal to link on-street permit charges to inflation through automatic fee indexation. Recent inflation is attributed to factors outside the council's control, including international energy shocks, currency debasement and fiscal pressures. Linking future permit charges to inflation may be viewed as unjustified and regressive, embedding permanent annual increases without transparent review or consideration of residents' economic circumstances. Forecast deviations by the Office for Budget Responsibility are cited to question the reliability of CPI-based mechanisms. An initial 20% uplift may be disproportionate to recent inflation of around 2.8%, setting an excessively high base for subsequent rises. Administration, enforcement and digital system costs do not fluctuate in line with general inflation, suggesting the base charge should more accurately reflect actual expenses. A moderate one-off increase of around 10% followed by inflationary adjustments or indexing to RPI is proposed as a more balanced alternative. Historical under-indexation compared with rail and bus fares is noted, supporting an initial adjustment to correct the discrepancy.

e) **Visitor and trade permit arrangements** (21 respondents, 11%):

Respondents express concern that the policy's proposed increases to visitor and trade permit arrangements could unduly penalise residents and local businesses. The proposed visitor permit increase from £1 to £2.50 per day is described as excessive, disproportionate and far from modest. A cumulative 250% rise over three years for visitor parking is viewed as wholly unreasonable. Existing visitor parking charges, trade permit fees of around £1,200 per year and high council tax bills are already considered onerous. Removal of free Sunday parking and failure to prevent non-residents from occupying on-street spaces on Daniel Street is said to exacerbate resident parking difficulties. Advance booking requirements for tradespeople, childcare providers and friends are seen as causing regular inconvenience. On-street trade permit fees may already overburden small businesses and penalise essential services. Permit limits are noted to restrict numbers and force additional charges seven days a week. Alternative measures are suggested, including stricter enforcement of non-resident parking, consistent permit rules across all zones, pay-and-display charges for day visitors, local worker passes and proof-of-residence criteria favouring full-time local residents. A more flexible system allowing ad hoc visitor permit purchases is proposed to reduce the need for advance planning.

f) **Assurance of parking availability** (16 respondents, 9%):

Respondents express that paying for an on-street parking permit does not guarantee a parking space and that assurance of availability is lacking. Individual bays could allow more accurate parking but enforcement is inadequate. Payment for a permit may not secure a space outside the home. Unchecked overnight parking by others often leaves shift workers returning late with no spaces. Permit fees may be unjustified when capacity, quality or

availability of parking has not increased accordingly. Dual-use bays on Bedford Street and Weymouth Street are almost always full, leaving no local alternatives. Students from nearby accommodation often occupy residential streets in the evenings. Households owning multiple vehicles have led to insufficient parking availability in Bear Flat avenues. Free parking for non-visitors on Daniel Street could prevent residents from parking nearby. Insufficient local parking forces drivers to use spots further away, such as midway up Snow Hill or in Kensington Gardens. Weekend visitor permit charges may be unnecessary when spaces appear abundant. Willingness to pay more could be conditional on knowing a space will actually be available. Securing a parking space may be possible only around half the time. The RPZ has not improved availability, particularly during school drop-off and pick-up times. The guaranteed increase in permit fees for fewer spaces per subscriber may be viewed as unjustified. Drawing lines and creating individual bays might improve parking accuracy.

g) **Size-based permit pricing** (13 respondents, 7%):

Size-based permit pricing links permit fees to vehicle dimensions or weight and prompts debate over its fairness, evidential basis and revenue impacts. A surcharge on larger vehicles without clear criteria defining a larger vehicle may face opposition. Safety-based links between costs and vehicle size may lack robust evidence and could require comparison with factors such as speed, driver attention, visibility and road conditions. Charging higher fees exclusively to owners of larger or more polluting vehicles may be seen as a way to fund necessary cost increases. Charging fees by vehicle weight or by space occupied may be preferred over uniform permit rates. An additional size-based charge may generate surplus revenue beyond what is needed to offset funding shortfalls. Electric vehicles might not escape charges if their larger dimensions or on-street charging units risk obstructing pavements. Flat treatment of all vehicles may be regarded as fairer than differentiating by size. Very large electric cars may warrant higher fees due to greater space usage and perceived safety risks. A package of permit increases including size-based charges may be deemed unacceptable.

h) **Transparency of RPZ cost recovery** (13 respondents, 7%):

Respondents seek clear, detailed information on the RPZ cost recovery process to assess the justification for higher on-street permit fees under the policy. Full calculation documentation and a basic breakdown of main cost contributors to the RPZ scheme are sought to clarify the basis of fee increases. A detailed explanation of how a 20% permit fee increase aligns with changes in RPZ operating costs has been requested. Conditional support for fee increases has been tied to proof that revenues will solely cover scheme administration costs. Clarification on whether surplus surcharge revenue accrues to Bath & North East Somerset Council or to MI Permits has

been sought. Historical annual income and expenditure data for the RPZ scheme in spreadsheet and graphical form since inception have been requested. Line-by-line breakdowns of fee expenditure and related income statements for the permit cost centre could clarify how collected fees are allocated. Scepticism that the safety rationale masks revenue generation underscores demands for supporting financial evidence. Evidence of actual maintenance spending on permit-controlled roads, such as parts of Moorland Road, has been cited as necessary to validate fee allocation. Uncertainty over whether the proposed fee hikes will resolve budget shortfalls without transparent financial data has been highlighted.

i) **Other** (164 respondents, 87%):

Discussions under the 'Other' theme highlight further concerns and suggestions regarding the proposed increase in on-street permit costs. Trust in the council's motives has been eroded by views that the rise is designed to supplement the budget rather than improve parking or traffic management. The proposed 20 per cent uplift is seen as excessive and ill-timed amid rising living costs and stagnant wages. Evidence supporting claims of cost-neutrality and benefits for air quality or road safety is viewed as lacking. A lack of reliable, affordable public transport and insufficient on-street EV charging is cited as justification for residents' continued reliance on cars. Alternative measures include visitor or tourist levies, enhanced park and ride and bus links, formal car-sharing schemes and improved council efficiency. Equity concerns arise from the burden placed on residents who already pay council tax, have no off-street parking and require vehicles for work, caring responsibilities or areas poorly served by public transport. Criticism is levelled at the RPZ scheme's design and roll-out, with reports of flawed consultations, expanding zones and parking displaced to neighbouring streets. However, a baseline increase after a decade without change could be viewed as proportionate if funds are used transparently and accompanied by phased or means-tested approaches.

3.5.9 To what extent do you support or oppose our proposals to remove the 50% discount for electric vehicles?

a) **Parking-Fee Policy Alignment** (52 respondents, 35%):

Respondents question whether parking fees should vary by vehicle propulsion under the policy to remove the 50% discount for electric vehicles. Vehicles occupy the same amount of road and parking space regardless of fuel type, so parking charges may more appropriately be linked to space usage rather than emissions. Charging electric vehicles without a discount may undermine efforts to reduce air pollution by removing a key incentive for zero-emission car ownership. Removing the 50% discount may also send a contradictory policy signal by penalising the very group that the council's clean-air

objectives are designed to encourage. Conversely, charging electric vehicles the same as other cars may be viewed as fair if larger electric models occupy more space or impose greater wear on infrastructure. Interim arrangements maintaining a reduced rate until electric vehicles represent a larger share of permits may better align with the transition to low-emission transport. Parking charges may be further refined by linking fees to vehicle size or weight instead of propulsion system.

b) Road Wear and Space Occupancy (37 respondents, 25%):

Respondents argue that electric vehicles' increased weight and size justify removing the 50% parking discount. Heavier electric vehicles may cause disproportionate road wear and accelerate degradation of surfaces and infrastructure. Larger dimensions can lead to vehicles spanning multiple bays, narrowing carriageways and obstructing sightlines. On-street charging often extends bay occupancy, further reducing available spaces. Occupying the same or greater footprint than conventional cars suggests parking fees should reflect spatial use rather than vehicle type. Implementing charges based on bay area occupied could ensure fairness, while imposing higher rates on oversized models may address their greater impact on road surfaces and street capacity.

c) Charging-Point Infrastructure Provision (21 respondents, 14%):

Charging-point infrastructure is widely cited as inadequate in Bath, limiting residents' ability to adopt electric vehicles and undermining support for the policy to remove the 50% parking permit discount for electric vehicles. Absence of on-street charging is described as impractical for those without off-street parking and may deter ownership. Ringfenced funding from electric-vehicle permit income could be used to install lamppost charging points on all residential streets. Installation of charging points across terraced and town-centre areas is advocated to prevent cars tying up kerbside parking and to avoid hazardous trailing cables. Demand for much better provision is seen as more effective than retaining the discount in boosting electric-vehicle uptake, and removal of the discount is deemed unfair while accessible charging remains limited.

d) Resident Charging Equity (14 respondents, 9%):

Respondents highlight a lack of accessible charging infrastructure for those relying on on-street parking. On-street charging infrastructure may be essential for residents without private driveways or garages. Lamp-post charging points could enable electric vehicle ownership in terraced and town-centre streets. Dragging cables across the pavement may pose safety and liability concerns. Lack of nearby charging facilities may render electric vehicles impractical for households in areas of terraced housing. Removal of

the 50% discount policy could unfairly disadvantage those who invested in electric vehicles amid insufficient council provision of accessible charging. Ring-fencing funding for street charging infrastructure could support equitable adoption of electric vehicles. Street charging at low rates may reduce reliance on high-rate fast chargers and encourage broader uptake. Equal charges for all households may address fairness if private parking availability determines current advantages.

e) **Early-Adopter Fairness** (14 respondents, 9%):

Respondents regard the proposed removal of the 50% discount as penalising early adopters of electric vehicles. The measure may contradict earlier incentives that encouraged purchases of low-emission cars and could undermine efforts to reduce pollution. Its timing may be premature while electric vehicles account for a small share of permits and charging infrastructure remains limited. Maintaining the discount or phasing it out gradually could offer a fairer transition and preserve the incentive structure that informed initial purchasing decisions.

f) **Incentive Phasing and Withdrawal** (13 respondents, 9%):

Respondents emphasised the need for a phased withdrawal of the policy to remove the 50% discount for electric vehicles, rather than an abrupt termination. A phased approach tied to infrastructure enhancements and affordability considerations could maintain trust and uphold policy integrity. A reduction to a 25% discount is proposed as a fairer interim measure, with retention of a discounted rate until electric vehicles represent at least 20% of permits. Abrupt removal of the discount is said to send a contradictory signal, disincentivise purchases and risk undermining future collaboration on environmental programmes. Complete exclusion of electric vehicles from the discount is described as excessive, unjustified and unfair given historical commitments. Incentives may become unviable once electric vehicle uptake reaches a higher level, indicating the withdrawal timetable should be guided by data. Electric vehicles could face the same charge rate as other vehicles when incentives have served their purpose.

g) **Lifecycle Emissions Accounting** (6 respondents, 4%):

Respondents emphasised the need to account for full lifecycle emissions when assessing the policy. Electricity generation for electric vehicles relies heavily on fossil fuel and nuclear sources that may carry substantial environmental costs. Power supplied to electric cars often originates from high-emission stations, reducing potential gains in carbon savings. Manufacture and mining of batteries could generate significant emissions that may offset reduced operational outputs. Lifecycle environmental costs may be underestimated if analysis focuses solely on tailpipe emissions. Accounting

for production, use and disposal may reveal electric vehicles produce pollution levels comparable to internal combustion engine vehicles overall.

h) **Revenue Ring-fencing for EV Support** (4 respondents, 3%):

Respondents suggested that revenue from electric-vehicle permits could be ring-fenced to support street charging infrastructure such as lamppost charging points. Removing the 50% permit discount would appear revenue-driven rather than environmentally motivated. The higher permit fee may benefit the council financially without improving air quality or emissions. Ring-fenced funding may encourage residents to adopt suitably charged electric vehicles. Permit income could be allocated to installing and maintaining on-street charging points.

i) **Other** (95 respondents, 64%):

Respondents express a range of views under the 'Other' theme regarding the proposal to remove the 50% discount for electric vehicles. The discount may encourage electric vehicle adoption and improve air quality. Removal is described as a revenue-raising measure that contradicts sustainable and air quality objectives. It could discourage motorists from choosing electric vehicles and penalise those who cannot afford new cars. However, equal pricing is considered fairer to non-electric vehicle owners and a means for electric vehicles to pay their share. The rationale for withdrawing the discount is criticised as unclear and under-researched, with calls for detailed impact analysis on vehicle purchase choices and council revenue. Electric vehicles still generate particulate emissions through tyre and brake wear. Equal treatment of all cars is advocated by some, while additional incentives or free parking are requested to support electric vehicle users. Minimal revenue gain from a small proportion of electric vehicle permits is cited as insufficient justification. Suspicion arises that fossil fuel interests may have influenced the proposal. Detailed justification and transparency are requested to ensure alignment with air pollution and climate goals.

3.5.10 To what extent do you support or oppose our proposals to introduce an annual review of permit charges linked to inflation?

a) **Indexation Mechanism Design** (89 respondents, 60%):

Respondents express a range of views on the policy to introduce an annual review of permit charges linked to inflation. Linking permit charges to inflation may ensure schemes remain self-financing and prevent occasional large increases. Arbitrarily tying annual uplifts to general inflation measures could penalise households whose incomes lag behind CPI or RPI. Administrative costs are described as largely fixed or falling due to digitisation, so general inflation may not correlate with scheme costs. Automatic indexation may

remove incentives to improve efficiency and bypass democratic oversight unless accompanied by caps, collars or ring-fencing of revenue for road improvements. Selection of the inflation metric is contested, with suggestions favouring wage or scheme-specific cost indexes over CPI or discredited RPI. Periodic cost-based reviews every three to five years are proposed as a fairer, more transparent mechanism than default annual uplifts. Allowing charges to decrease when inflation falls or surpluses arise is seen as key to maintaining accountability and aligning fees with actual costs. Delaying the start of indexation or limiting increases to no more than the lower of key inflation indicators is offered as a measure to safeguard low-income households. Introducing an annual review linked to inflation could be considered reasonable in principle if the initial baseline and metric are clearly defined and justifiable.

b) Review Frequency and Base-Year Adjustments (47 respondents, 32%):

Review Frequency and Base-Year Adjustments summarises views on how often and from what starting point permit charges should be recalibrated under the policy. Annual reviews may penalise low-income users, compound costs year after year and lack guarantee of service improvements. Periodic reviews every 3–5 years could provide a fairer, more transparent mechanism tied to the actual cost of delivering the scheme. Base-year adjustment via an immediate 20% increase may establish an unduly high baseline for future inflation-linked rises. Linking charges to inflation should allow reductions when inflation falls and be capped at RPI or CPI levels. Transparency on the methodology for calculating base charges and on operational cost components could improve accountability. Delaying the start of automatic inflation-linked adjustments until after a cost-of-living crisis or until service enhancements are delivered could mitigate resident burdens. Operational costs should be reviewed and reduced annually to justify any subsequent charge adjustments.

c) Correlation with Scheme Running Costs (34 respondents, 23%):

Respondents question the link between permit charges and inflation on the basis that general inflation does not reflect the council's local operating costs. General inflation may not correlate with the cost of administering resident parking schemes. Inflation driven by global energy shocks, currency fluctuations and geopolitical factors may not increase scheme running costs. Administrative expenses are viewed as largely fixed or falling due to digitisation, so they may not rise in line with CPI or RPI. Linking charges to inflation could remove any incentive to improve efficiency in scheme management. An automatic annual increase may compound beyond genuine cost pressures and risk spiralling permit fees. Charges could be set more appropriately through a transparent review of actual local needs, service levels and cost inputs. Publishing full scheme accounts, including income, signage and enforcement expenditures, would demonstrate cost-benefit to

residents and justify rises. Any annual review should be tied to changes in the actual costs of running the permit scheme rather than general inflation measures. Care should be taken when selecting the inflation index to ensure it best aligns with scheme-specific cost increases. Linking permit charges to inflation may only be acceptable if administrative costs are clearly rising and wages are index-linked in tandem.

d) Distributional Impact and Exemptions (26 respondents, 18%):

Linking permit charges to inflation is viewed as a policy that could impose disproportionate burdens on low- and fixed-income households. Regressive impacts may be compounded where wage growth lags behind inflation, leaving real incomes insufficient to meet rising fees. Car dependency may be unavoidable for households in areas with limited public transport, for older residents and parents with children, and for those without off-street parking. Automatic inflation-adjustment is seen as offering no environmental benefit while unfairly penalising those who can least afford on-street parking. Exemption of blue badge holders from permit charges is strongly opposed. Mitigation measures are proposed, including free permits for homeowners, half-price season tickets in outer zones, and charge reviews linked to residents' real buying power. Eliminating permit fees for parking outside one's own home is also suggested. Public transport is urged to remain affordable to prevent further hardship for those lacking viable alternatives.

e) Inflation Index Choice (21 respondents, 14%):

Clarification is sought on which inflation metric will underpin the annual review of permit charges under the policy. Linking permit charges to inflation is viewed as fair and reasonable provided a suitable metric is used. Linking to general measures such as CPI or RPI may penalise residents when wages do not keep pace, and the OBR's inflation forecasts are regarded as unreliable. RPI is regarded as discredited, while CPI may underrepresent actual cost increases. Alternative measures such as GDP deflators, scheme-specific cost inflation or wage inflation could better reflect affordability, though accepted indices for wage inflation are lacking. Commitments are requested to cap increases to the lower of main inflation indicators or to prevent rises exceeding annual CPI.

f) Cost Transparency and Accountability (13 respondents, 9%):

Respondents describe the RPZ pricing system as too opaque. Requests for details on what permit charges actually fund are raised. At no point is the intended use of projected revenue explained. Questions arise over the basis for a proposed 20% increase and which inflation rate will be applied. A cost-based review every three to five years is suggested as a fairer, more transparent alternative. Automatic linking of permit charges to inflation removes transparency and democratic oversight by ensuring price rises occur without justification. Publication of the scheme's annual accounts and full cost and income breakdown — including signage and enforcement costs — is

recommended to demonstrate benefits to residents. Future adjustments to permit charges could be subject to transparent reviews of local needs, service levels and public input rather than default inflationary increases. Complete fiscal transparency is proposed for the policy's annual review, with any increases justified by the rising costs of running the scheme and clear evidence of funding shortfalls.

g) Revenue Allocation and Ringfencing (7 respondents, 5%):

Ringfencing and transparent allocation of revenue are identified as essential conditions for supporting inflation-linked permit charge increases under the policy. • Revenue could be ringfenced for road improvements. • Scheme surpluses could be required to offset or reduce future charge increases. • Permit charges may be justified only when linked to investment in new car parks or park and ride sites. • Permit revenue could finance off-street parking facilities to ease on-street parking dependency. • Increases could be backed by enhanced warden checks to ensure compliance. • Lack of detail on proposed revenue use may undermine support. • Embedding a surplus-offset requirement within the policy could prevent revenue misuse.

h) Complementary Transport Investments (7 respondents, 5%):

Respondents emphasised that support for rising parking permit costs should be paired with significant investments in alternative travel options. Active travel infrastructure improvements and enhanced public transport could reduce reliance on car travel. Viable alternatives might include new park and ride sites, additional car parks and half-price season tickets for Zone 6 residents, with discounts tapering for outer zones. Affordability measures could help low-income users who lack sufficient public transport provision. Recognising that some residents cannot cycle or bus, integrated enhancements could ensure daily travel needs are met. The policy could be more acceptable if these complementary measures were secured.

i) Other (75 respondents, 51%):

Respondents raise concerns about the policy of linking permit charges to inflation, arguing that existing fees already generate significant council revenue and further increases would exacerbate household financial strain. Annual inflationary adjustments may be unfair where incomes have not kept pace, and no evidence is offered to justify claims of improved safety, pollution reduction or public health benefits. Permit fees are described as a stealth tax without corresponding service improvements, and alternatives such as higher penalties for illegal parking or administrative cost savings are promoted. The proposal is viewed as arbitrary without caps, clearer accountability for collected funds or alignment to actual service costs. Cumulative cost pressures from council tax increases and service cuts contribute to opposition to further fee rises. Conversely, linking charges to inflation is deemed sensible by some, provided increases remain modest and transparent.

4 Discussion of Results

4.1 Discussion of qualitative feedback

- 4.1.1 While the age profile of respondents (Figure 1) does not align with the 2024 mid-year ONS population estimates for Bath & North East Somerset, this is likely to reflect patterns of vehicle use. Under-representation of older age groups (75+) may reflect lower levels of car use, with many individuals choosing not to continue driving; in addition, driving licences require renewal every three years from the age of 70. These factors are likely to have skewed the overall age distribution of responses.
- 4.1.2 Department for Transport data shows that the 50–59 age group has the highest proportion of full UK driving licence holders, with 86% holding a licence in 2024.
- 4.1.3 The majority of respondents were in the 55-64 age bracket which follows the same age pattern seen in previous consultations.
- 4.1.4 97% (222) of responses originate from 14 wards (Figure 3) where on street parking is currently managed by, or where it's proposed to be managed by, resident parking schemes, and where residents are therefore more directly impacted by proposals that affect the charges for permits. The council currently manages a total of 32 separate schemes encompassing approximately 18,612 residential properties.
- 4.1.5 In response to the question “How concerned are you about air pollution and the impacts on people’s health?”, respondents aged 45–64 expressed the highest levels of concern at 21% of total responses.
- 4.1.6 The same age 45-64 demographic indicated higher responses in favour of tackling and improving air quality at 27% (76) of total responses.
- 4.1.7 Of the 61% (169) of respondents who opposed the increase in on street permit prices, respondents in all age brackets strongly opposed.
- 4.1.8 44% of respondents indicated in favour of removing 50% discount for electric vehicles, with 15% indicating that of no opinion.
- 4.1.9 Respondents aged 35–64, who expressed the strongest concern about air quality and the importance of tackling climate change, also showed the highest level of opposition to annual inflation-linked permit charge reviews, at 35% of responses. This suggests that opposition is focused primarily on affordability rather than the underlying policy objectives.

4.2 Discussion of quantitative feedback

4.3 How concerned are you about air pollution and the impacts on people's health?

- 4.3.1 Respondents demonstrated a broad awareness of the relationship between transport, congestion and air quality. Many comments focused on the importance of reducing vehicle emissions and managing traffic flow, with respondents identifying congestion, queuing traffic and engine idling as significant contributors to poor air quality, particularly within Bath's constrained historic street network. Respondents also highlighted the role of public transport, park and ride provision, active travel infrastructure and wider traffic management measures in helping to improve air quality and protect public health.
- 4.3.2 A number of respondents questioned the extent to which changes to residents' parking permit charges would directly improve air quality and requested additional evidence demonstrating the environmental benefits of permit charging policies. Some respondents suggested that greater focus should be placed on other contributors to poor air quality, including diesel buses, commercial vehicles, through-traffic, domestic wood burning and freight movements. Others felt that improving traffic flow, rather than increasing parking charges, would provide greater air quality benefits.
- 4.3.3 The Council recognises these concerns and acknowledges that parking policy alone cannot resolve all air quality challenges. However, the purpose of the proposals is not solely to address emissions. Residents' parking permit charges form part of a wider package of transport measures intended to support the efficient operation of the road network, reduce congestion, manage demand for limited kerbside space and encourage a gradual shift towards more sustainable travel choices. The proposals have been developed having regard to the Council's duties under the Road Traffic Regulation Act 1984, including improving air quality, reducing congestion and facilitating the safe and convenient movement of traffic and pedestrians.
- 4.3.4 The Council also notes that transport remains a significant contributor to carbon emissions and poor air quality locally, and that reducing reliance on private car travel forms a key component of the adopted Movement Strategy for Bath and the Council's wider Journey to Net Zero commitments. These strategies recognise that improvements in public health, air quality, congestion and road safety are interconnected and require a combination of measures, including parking management, public transport improvements and enhanced opportunities for walking, wheeling and cycling.

- 4.3.5 The Council recognises that cost-of-living pressures remain an important concern for many households and that respondents are rightly sensitive to any proposal which increases the cost of motoring. These considerations have been carefully assessed through the Equality Impact Assessment and the development of the proposals. The Council has sought to minimise adverse impacts by retaining a range of permit options, including shorter-duration permits, maintaining free permits for eligible Blue Badge holders living within permit zones, retaining alternative parking and visitor permit arrangements, and continuing to support access to public and community transport schemes. The Equality Impact Assessment also acknowledges that certain groups may be more sensitive to increases in parking costs and identifies affordability and flexibility measures which help mitigate those impacts.
- 4.3.6 While respondents expressed differing views on how air quality should be improved, there was a common theme that improving public health and reducing pollution remain important objectives. The Council considers that the proposals contribute proportionately towards those aims by supporting more efficient use of limited road space, reducing congestion pressures, encouraging cleaner and more space-efficient vehicle choices, and helping ensure that residents' parking schemes remain effective and financially sustainable in the longer term.

4.4 In your opinion, how important is tackling and improving air quality?

- 4.4.1 Feedback demonstrated that respondents generally regard air quality as an important issue, particularly in relation to public health, congestion and the quality of life within Bath. A significant proportion of respondents highlighted the role of traffic management, public transport, vehicle emissions, active travel and wider environmental measures in improving air quality. While there was broad recognition of the importance of cleaner air, respondents expressed differing views on whether the specific parking permit proposals would make a meaningful contribution towards achieving that outcome.
- 4.4.2 Respondents frequently linked air quality concerns to wider transport issues, particularly congestion and traffic flow. Many comments suggested that reducing queues, improving traffic movement, encouraging greater use of park and ride facilities, improving public transport and supporting a transition to lower-emission vehicles would be more effective than increasing permit charges alone. Several respondents also noted that air quality challenges arise from multiple sources, including commercial vehicles, buses, construction activity and domestic wood burning, and therefore require a broader package of interventions.

- 4.4.3 A recurring theme within the responses was concern that the proposed permit charge increases were being used primarily as a revenue-raising measure rather than as a direct tool to improve air quality. Respondents requested clearer evidence demonstrating the relationship between permit pricing and environmental outcomes and questioned whether increasing the cost of permits for residents would materially reduce emissions or congestion. Similar concerns were raised in relation to fairness and transparency, particularly where residents have limited alternatives to private vehicle use.
- 4.4.4 The Council acknowledges these concerns and recognises that air quality improvement must be supported through a range of complementary measures. However, the purpose of parking management is not solely to address emissions directly. Appropriately pricing parking helps manage demand for limited road space, supports the efficient operation of Residents' Parking Zones, reduces vehicle dominance within residential areas and contributes towards wider objectives to reduce congestion and encourage more sustainable travel choices. These outcomes support the Council's statutory duties under the Road Traffic Regulation Act 1984 and are consistent with adopted transport policies, including the Journey to Net Zero, Liveable Neighbourhoods programme and the wider Movement Strategy for Bath, which identifies reducing reliance on private vehicles and improving travel choices as essential components of improving air quality and reducing transport emissions.
- 4.4.5 The Council also recognises that residents continue to face cost-of-living pressures and that any increase in parking-related charges may have an impact on household finances. Respondents rightly highlighted the potential effect on those who rely on a vehicle for work, caring responsibilities or where public transport alternatives are limited. These impacts have been considered through the Equality Impact Assessment, which acknowledges that some groups may be disproportionately affected by additional costs and identifies a range of mitigations. These include the continued availability of permits in shorter one, three and six-month durations to spread costs, free resident permits for eligible Blue Badge holders, ongoing access to community transport schemes and concessionary travel, the retention of alternative methods for purchasing permits, and continued investment in active travel and sustainable transport infrastructure to expand travel choices over time.
- 4.4.6 Improving air quality remains an important objective of the Council's transport and public health policies. While parking permit charges alone will not resolve air quality challenges, they form part of a wider package of measures intended to manage demand for road space, support cleaner and safer streets, encourage sustainable travel choices and ensure that Residents' Parking Zones remain financially sustainable without requiring subsidy from the wider taxpayer. The Council therefore considers the proposals to be proportionate when balanced against the wider environmental, public health

and transport benefits they seek to support.

4.5 To what extent do you support or oppose our proposals to increase the cost of on-street permits?

- 4.5.1 The council notes the level of feedback received in response to the proposed increase in the cost of on-street permits. Respondents raised concerns about affordability, the impact on low-income and multi-car households, the effect on residents without access to off-street parking, the relationship between charges and emissions, enforcement, parking availability, visitor and trade permit arrangements, transparency around RPZ cost recovery, and whether the proposals would be fair during a period of wider household financial pressure. These themes broadly reflect concerns raised in previous parking charge consultations, where proposals to increase charges are typically strongly opposed.
- 4.5.2 The quantitative response shows clear opposition to the proposed increase, with 61% of respondents fully opposing an increase in on-street permit prices. The council recognises that this level of opposition is high and that parking charges are a sensitive issue, particularly for residents who rely on on-street parking close to their home.
- 4.5.3 The council also recognises the current cost-of-living pressures affecting many households. Respondents were clear that any increase in permit charges may be felt more sharply by residents on lower incomes, families with more than one vehicle, people unable to afford newer or lower-emission vehicles, and those who need a vehicle for work, caring responsibilities or because public transport is not a practical alternative. These concerns are understood and have been considered carefully alongside the purpose of the proposals.
- 4.5.4 However, the baseline residents' parking permit charge has remained unchanged for a significant period, while the costs of administering, maintaining and enforcing Residents Parking Zones have increased. The purpose of the proposed increase is therefore to help ensure that RPZs remain financially sustainable and that the cost of operating them is met by those who directly benefit from the schemes, rather than being subsidised by wider council budgets, including by households who do not own or cannot afford to own a car. This approach is consistent with the council's Residents Parking Scheme Strategy and the wider principle that resident parking schemes should be self-financing.
- 4.5.5 The council accepts that a permit does not guarantee a parking space and that this was a recurring concern in the consultation. A permit provides authorisation to park within eligible bays where space is available; it does not

reserve a specific bay or remove all competing demand. Nevertheless, the administration, maintenance and enforcement of RPZs supports residents by managing kerbside demand, limiting commuter parking, and helping to prioritise available parking space for eligible permit holders and their visitors. Ensuring that the schemes remain properly funded is therefore important to their continued effectiveness.

- 4.5.6 Respondents also raised concerns that higher charges may appear to be revenue raising rather than linked to genuine parking management objectives. The council acknowledges this concern. Parking permit charges cannot be set simply for the purpose of raising revenue. The proposals are intended to support cost recovery, effective administration and enforcement of RPZs, and wider traffic management objectives, including safer and more efficient use of limited kerb space. Where any surplus arises from on-street parking charges, it must be applied only for purposes permitted under section 55(4) of the Road Traffic Regulation Act 1984.
- 4.5.7 The council has considered the equalities impacts of the proposals through the Equalities Impact Assessment process. This recognises that some groups may be more affected by increased costs, including people on lower incomes, disabled people who do not qualify for a Blue Badge, people with caring responsibilities, some older residents, and people who may experience digital exclusion. Mitigations identified through the Equalities Impact Assessment process include the ability to purchase permits for shorter durations of 1, 3, 6 or 12 months, which helps reduce the upfront cost and provides greater flexibility; support through telephone and face-to-face channels; online services that meet accessibility standards; and continued availability of paper visitor permits where appropriate, including as a reasonable adjustment.
- 4.5.8 The Equalities Impact Assessment also identifies specific mitigation for disabled residents. Blue Badge holders living in a resident parking zone are entitled to a resident parking permit free of charge and Blue Badge holders may also park in residents' permit bays and on-street pay and display bays without charge when displaying a valid badge. This means that residents who meet the Blue Badge criteria are not directly affected by the proposed increase in resident permit charges.
- 4.5.9 The council recognises concerns that residents without off-street parking may feel they have little choice but to pay for a permit. However, the public highway is a finite resource and must be managed in the interests of all users, including residents, pedestrians, cyclists, public transport, emergency services, waste collection and deliveries. On-street parking places are not private parking spaces and the council must balance individual access needs with the wider duty to manage the highway safely, fairly and efficiently.

- 4.5.10 Some respondents argued that charges should be more closely linked to emissions, vehicle size, household income, the number of permits held, or actual use of a vehicle. The council recognises that more targeted approaches may have advantages in principle, but more complex charging structures can also be harder for residents to understand, more difficult to administer, and more costly to operate. The existing emissions-based structure already means that cleaner vehicles pay less than more polluting vehicles, while the separate size-based proposal addresses the different issue of how much space a vehicle occupies and the effect this has on highway safety and kerbside capacity.
- 4.5.11 Concerns about enforcement were also raised, with some respondents suggesting that higher charges would only be acceptable if enforcement of existing restrictions improved. The council agrees that visible and effective enforcement is important to public confidence. Officer resources are finite and are deployed according to demand, intelligence and operational priorities. The ongoing financial sustainability of RPZs supports the continued administration, maintenance and enforcement of those schemes. The council will continue to use local intelligence from residents and ward members to help target enforcement activity where specific problems are identified.
- 4.5.12 Respondents also asked for greater transparency about the costs of RPZs and how permit income is used. The council acknowledges that clear information is important to trust and accountability. The council will continue to monitor the costs and income associated with resident parking schemes, including administration, maintenance and enforcement costs, and will seek to improve the information made available through future reporting so residents can better understand how permit income supports the operation of the schemes.
- 4.5.13 Having considered the feedback, the council recognises the views of respondents on the proposed increase and that it comes at a sensitive time for household finances. The concerns raised about affordability, cost of living, fairness, enforcement, parking availability and transparency are valid and have been considered carefully. However, the council considers that a proportionate increase remains necessary to support the continued operation of RPZs, avoid the cost of these schemes falling on the wider taxpayer, and maintain effective management of limited on-street parking. On balance, the proposal is considered justified, subject to continued monitoring of scheme costs, ongoing transparency in reporting, and retention of the mitigations identified through the EqIA.

4.6 To what extent do you support or oppose our proposals to remove the 50% discount for electric vehicles?

- 4.6.1 Respondents raised a range of views on the proposal to remove the 50% discount for electric vehicle permits. Some respondents considered that removing the discount would reduce an incentive for residents to switch to cleaner vehicles and could send a mixed message when the Council is seeking to improve air quality and support the transition to lower emission transport. Others supported the proposal on the basis that electric vehicles still occupy the same limited kerb space as other vehicles, and in some cases may be larger or heavier, contributing to road wear, parking pressure and congestion.
- 4.6.2 The Council recognises the concerns raised about the timing of the proposal, particularly from residents who have already invested in an electric vehicle and may feel that the removal of the discount penalises early adoption. The Council also recognises comments that the withdrawal could be phased, or linked to wider provision of charging infrastructure. However, the current 50% discount applies only to vehicles emitting 0g/km CO₂, which currently comprise a small proportion of permits, and the Statement of Reasons explains that aligning EV permit charges with the least polluting vehicle band is considered a more equitable approach to meeting the operational costs of residents' parking schemes.
- 4.6.3 The purpose of a residents' parking permit is not only to reflect tailpipe emissions, but also to contribute to the administration, maintenance and enforcement of Residents' Parking Zones. Electric vehicles continue to use limited on-street parking space and contribute to demand for kerbside capacity in the same way as other vehicles. The proposal therefore seeks to ensure that EV permit holders make a fair and proportionate contribution to the costs of operating the scheme, while still ensuring that more polluting vehicles continue to pay more through the emissions-based charging structure.
- 4.6.4 Respondents also raised concerns about the lack of on-street charging infrastructure, particularly for residents without access to a driveway or private parking. The Council acknowledges that accessible charging is an important part of supporting the transition to electric vehicles. The wider transport programme already includes work to increase the number of EV charging points, alongside improvements to walking, wheeling, cycling and public transport options, as part of the Movement Strategy's approach to reducing car dependency and transport-related emissions.
- 4.6.5 The impact on the cost of living has also been considered. The Council recognises that any increase in permit costs may add to household pressures, particularly where residents rely on a car or have limited access to practical

alternatives. However, the previous EV discount is more likely to benefit households able to purchase or maintain a generally higher-cost electric vehicle, and the EqlA notes that removing the discount more equitably rebalances the contribution towards scheme operating costs.

- 4.6.6 Mitigations identified through the EqlA include the ability to purchase permits for shorter periods of 1, 3, 6 or 12 months, helping to reduce upfront costs and provide greater flexibility. The EqlA also identifies support for residents who may have difficulty using online services, including telephone support, in-person support at Council One Stop Shops, and the continued availability of paper visitor permits where required as a reasonable adjustment.
- 4.6.7 The EqlA further notes that residents of permit scheme areas who hold a Blue Badge are entitled to a resident permit free of charge, and that Blue Badge holders may also park in residents' permit bays and pay-and-display bays without displaying a permit or pay-and-display ticket, provided a valid Blue Badge is displayed. This provides a specific mitigation for disabled residents who may have a greater reliance on private vehicle access.
- 4.6.8 On balance, while the Council acknowledges concerns that removing the EV discount may be perceived as reducing an incentive for cleaner vehicles, the proposal is considered proportionate. It maintains the principle that higher-polluting vehicles pay more, while ensuring that electric vehicles contribute fairly to the costs of managing limited on-street parking space. The Council will continue to support the transition to electric vehicles through wider charging infrastructure and sustainable transport measures, while keeping the impact of parking charges under review through future monitoring of RPZ costs, income and scheme operation.

4.7 To what extent do you support or oppose our proposals to introduce an annual review of permit charges linked to inflation?

- 4.7.1 The council notes that the proposal to introduce an annual review of permit charges linked to inflation was not supported by a majority of respondents, with 36% supporting the proposal and 59% opposed.
- 4.7.2 Respondents raised a range of concerns, including whether general inflation is the right measure for parking permit costs, whether an annual review could lead to compound increases, whether the starting baseline would be too high following the proposed 20% uplift, and whether sufficient transparency would be provided on the actual costs of administering, maintaining and enforcing residents' parking schemes.
- 4.7.3 Respondents also raised concerns about the distributional impact of annual inflation-linked increases, particularly for residents on low or fixed incomes, residents whose wages do not keep pace with inflation, and those who remain

dependent on a vehicle because of work, caring responsibilities, limited public transport options or lack of off-street parking.

- 4.7.4 The council recognises the continuing impact of the cost of living on households and accepts that any proposal which could increase future permit charges will be a concern to many residents. These concerns are relevant and have been considered alongside the need to ensure that Residents' Parking Zones remain financially sustainable and do not require subsidy from wider council budgets.
- 4.7.5 The baseline residents' parking permit charge has not increased for over 10 years, despite ongoing inflationary pressures, and analysis of the administration, maintenance and enforcement costs for residents' parking schemes in 2024/25 indicated a £168k shortfall against income generated from on-street parking permits. Comparative data for 2025/26 is not yet available.
- 4.7.6 The purpose of introducing an annual review is therefore to avoid long periods where charges remain static followed by larger step changes, and to allow permit charges to be considered in a more regular, transparent and proportionate way as part of the council's annual Fees and Charges process.
- 4.7.7 The proposal does not provide for unlimited or unchecked annual increases. Any increase would be linked to CPI and would not exceed inflation, with the index based on the percentage change between the month the new charges are proposed and the equivalent figure 12 months earlier. Any proposed increase above the inflationary index would require further public engagement so that feedback could be considered.
- 4.7.8 The annual review would also be formalised through the council's Fees and Charges setting process, which is consulted on and adopted by Full Council as part of the annual budget setting process. Charges would be published on the council's website so that they remain accessible to residents.
- 4.7.9 The council also retains discretion not to apply an inflationary change in periods of exceptionally low or exceptionally high inflation, or where the cost of implementation would outweigh the financial benefit of the increase. This provides an important safeguard and means that the review is not intended to operate as an automatic increase in all circumstances.
- 4.7.10 The council acknowledges comments that general inflation may not always directly reflect the actual cost of operating parking permit schemes. For this reason, future reviews should continue to be informed by the costs and income associated with Residents' Parking Zones, including administration, maintenance and enforcement costs. Officers will continue to monitor RPZ financial performance and include appropriate summary information within

future annual reporting to improve transparency.

- 4.7.11 The EqlA recognises that increases in permit costs may affect some residents more than others, including those on lower incomes, older people, disabled people who do not qualify for a Blue Badge, carers, pregnant people or households with other cost pressures. Relevant mitigations include the ability to purchase permits for shorter durations, including 1, 3, 6 and 12 months; continued telephone, online and face-to-face support; paper visitor permits where appropriate; free limited waiting and loading provision in scheme areas; and free resident permits for eligible Blue Badge holders living in resident parking zones.
- 4.7.12 The EqlA also identifies wider mitigations and alternatives, including access to One Stop Shop support, MiPermit telephone support, the availability of Diamond Travelcards for qualifying residents, and community transport options for people who cannot use public transport because of disability, age or lack of access to services.
- 4.7.13 These mitigations do not remove the financial impact of any future increase, and the council recognises that annual reviews must remain sensitive to affordability and cost-of-living pressures. However, they help reduce barriers to access and provide flexibility for residents who may not be able to pay for a full annual permit in one transaction.
- 4.7.14 Surplus raised from on street charges must be applied for a purpose specified in section 55(4) of the Road Traffic Regulation Act (1984) (RTRA 1984) and will be allocated to support the development of sustainable transport schemes in accordance with statutory obligations, such as Safer Routes to Schools.
- 4.7.15 Overall, the council considers that an annual review linked to inflation remains a reasonable and proportionate approach, provided it is applied transparently, capped at inflation, considered through the annual Fees and Charges process, and informed by ongoing monitoring of scheme costs and income. The proposal supports the long-term financial sustainability of residents' parking schemes while avoiding the need for less frequent but larger increases in future.

Appendix A – Details of proposed charges

Full details of the proposed charges included within the public consultation are set out below.

1. Proposed baseline charge

All permits linked to the baseline charge (for example Medical and Social Care permits, GP permits) will be uplifted accordingly.

Product type	Current permit costs	Proposed permit costs
First permit	£100	£120
Second permit	£160	£192

2. Proposed Business permit charge

20% uplift in line with baseline charge increase.

Product	Current cost 12 months	Current cost 6 months	Proposed cost 12 months	Proposed cost 6 months
First permit	£110.00	£55.00	£132.00	£66.00
Second permit	£160.00	£82.50	£192.00	£96.00

3. Emission-based resident' permits

a. Current Annual Charge – Permit Costs by Emissions and Engine Capacity

CO ₂ emissions (g/km)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0	£50.00	£80.00	–	–
1–50	£100.00	£160.00	£125.00	£200.00
51–75	£100.00	£160.00	£125.00	£200.00
76–90	£100.00	£160.00	£125.00	£200.00
91–100	£100.00	£160.00	£125.00	£200.00
101–110	£100.00	£160.00	£125.00	£200.00
111–130	£100.00	£160.00	£125.00	£200.00
131–150	£105.00	£168.00	£131.25	£210.00
151–170	£110.00	£176.00	£137.50	£220.00
171–190	£115.00	£184.00	£143.75	£230.00
191–225	£120.00	£192.00	£150.00	£240.00
226–255	£125.00	£200.00	£156.25	£250.00
Over 255	£130.00	£208.00	£162.50	£260.00
Engine capacity (where no CO ₂ emissions data is available)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0–1550	£125.00	£200.00	£156.25	£250.00
1551–1950	£150.00	£240.00	£187.50	£300.00
1951–2950	£175.00	£280.00	£218.75	£350.00
Over 2951	£200.00	£320.00	£250.00	£400.00

b. Current Monthly Charge – Permit Costs by Emissions and Engine Capacity

CO₂ emissions (g/km)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0	£4.79	£7.29	–	–
1–50	£8.95	£13.95	£11.04	£17.29
51–75	£8.95	£13.95	£11.04	£17.29
76–90	£8.95	£13.95	£11.04	£17.29
91–100	£8.95	£13.95	£11.04	£17.29
101–110	£8.95	£13.95	£11.04	£17.29
111–130	£8.95	£13.95	£11.04	£17.29
131–150	£9.37	£14.62	£11.56	£18.12
151–170	£9.79	£15.29	£12.08	£18.95
171–190	£10.20	£15.95	£12.60	£19.79
191–225	£10.62	£16.62	£13.12	£20.62
226–255	£11.04	£17.29	£13.64	£21.45
Over 255	£11.45	£17.95	£14.16	£22.29
Engine capacity (where no CO₂ emissions data is available)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0–1550	£11.04	£17.29	£13.64	£21.45
1551–1950	£13.12	£20.62	£16.25	£25.62
1951–2950	£15.20	£23.95	£18.85	£29.79
Over 2951	£17.29	£27.29	£21.45	£33.95

c. Proposed Annual Charge – Permit Costs by Emissions and Engine Capacity

CO₂ emissions (g/km)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0	£120.00	£192.00	–	–
1–50	£120.00	£192.00	£150.00	£240.00
51–75	£120.00	£192.00	£150.00	£240.00
76–90	£120.00	£192.00	£150.00	£240.00
91–100	£120.00	£192.00	£150.00	£240.00
101–110	£120.00	£192.00	£150.00	£240.00
111–130	£120.00	£192.00	£150.00	£240.00
131–150	£126.00	£201.60	£157.50	£252.00
151–170	£132.00	£211.20	£165.00	£264.00
171–190	£138.00	£220.80	£172.50	£276.00
191–225	£144.00	£230.40	£180.00	£288.00
226–255	£150.00	£240.00	£187.50	£300.00
Over 255	£156.00	£249.60	£195.00	£312.00
Engine capacity (where no CO₂ emissions data is available)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0–1550	£150.00	£240.00	£187.50	£300.00
1551–1950	£180.00	£288.00	£225.00	£360.00
1951–2950	£210.00	£336.00	£262.50	£420.00
Over 2951	£240.00	£384.00	£300.00	£480.00

d. Proposed Monthly Charge – Permit Costs by Emissions and Engine Capacity

CO₂ emissions (g/km)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0	£10.74	£16.74	–	–
1–50	£10.74	£16.74	£13.24	£20.74
51–75	£10.74	£16.74	£13.24	£20.74
76–90	£10.74	£16.74	£13.24	£20.74
91–100	£10.74	£16.74	£13.24	£20.74
101–110	£10.74	£16.74	£13.24	£20.74
111–130	£10.74	£16.74	£13.24	£20.74
131–150	£11.24	£17.54	£13.87	£21.74
151–170	£11.74	£18.34	£14.49	£22.74
171–190	£12.24	£19.14	£15.12	£23.74
191–225	£12.74	£19.94	£15.74	£24.74
226–255	£13.24	£20.74	£16.37	£25.74
Over 255	£13.74	£21.54	£16.99	£26.74
Engine capacity (where no CO₂ emissions data is available)	Non-Diesel 1st Permit	Non-Diesel 2nd Permit	Diesel 1st Permit	Diesel 2nd Permit
0–1550	£13.24	£20.74	£16.37	£25.74
1551–1950	£15.74	£24.74	£19.49	£30.74
1951–2950	£18.24	£28.74	£22.62	£35.74
Over 2951	£20.74	£32.74	£25.74	£40.74