

Off Street Parking charge review Consultation Outcome Summary

13 October 2022

Revision 02

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Bath & North East Somerset Council Parking Services

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Date **14/10/2022**

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1 Introduction

1.1 Background

1.1.1 These proposals have been developed aimed to improve air quality through a major shift to public transport, walking and cycling and incentives to reduce the use of vehicles in order to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution.

1.1.2 These proposals are also aimed to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods and align with the Council policy on Liveable Neighbourhoods and the Journey to net zero.

The objective of any charging structure as highlighted by these proposals is to encourage private vehicle users when appropriate to choose sustainable modes of transport (cycling, walking, Park and Ride or public transport), rather than driving into the city or town centre to park'.

1.1.3 Air quality impacts on pedestrian safety, managing traffic flows and availability of parking are all significant issues in our region. Whilst the proposals are a separate standalone scheme, they are complimentary to other projects aimed at addressing these issues, including but not limited to the following:

- a) Promoting a major shift to public transport, walking and cycling, with incentives to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy
- b) Improving the safety of cyclists and pedestrians through active travel schemes which rebalance priorities on our roads
- c) Introducing and managing a Clean Air Zone in central Bath, to encourage less polluting ways of travelling around the city
- d) Liveable Neighbourhoods policy and work concerning reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods.

1.1.4 In order to develop a fair and balanced package of proposals to meet traffic management and pedestrian safety purposes, regard has been given (to an extent permissible with the requirements under s.122 of the Road Traffic Regulation Act 1984 (RTRA 1984)) to a range of issues which appear to the Council to be relevant, including potential impacts on residents; commerce; tourism; carbon footprint and air quality; and transportation.

1.1.5 On 11 February 2022, the Council's Cabinet approved proposals (Report E3321) to review car parking and car park permit charges as part of the budget setting process for 2022/23. The proposals to achieve these savings totals are outlined in section 1.2 of this report.

1.1.6 On 5 May 2022, the Council's Cabinet agreed to proposals for a new Park and Ride contract for Bath (report E3357). The new contract operates on a gross cost basis with the Council retaining future risk regarding to patronage. Within this report it was also agreed that parking charges could be implemented to any users to help offset the increased costs and operation of the service to ensure it remains viable. This is included within proposal (8) in section 3 of this report.

1.2 Purpose of the consultation

1.2.1 This consultation is to advertise changes proposed to the existing Off Street Traffic Regulation Orders. These changes are summarised below:

- a) Proposed Bath car park charges
- b) Proposed Keynsham car park charges
- c) Proposed car park season ticket charges
- d) Proposed new tariff to facilitate electric vehicle charging in long stay car parks
- e) Proposed charges for reserved space parking permits in residents permit holder only car parks
- f) Proposed permit holders only parking for Southview Road car park, Bath
- g) Proposed new seasonal parking charges at The Shallows car park in Saltford
- h) Proposed new charges for parking at Park and Ride car parks for those not using the park and ride service
- i) Removal of the 10% residents parking saver discount in car parks
- j) Removal of the 10p fee in car parks when using MiPermit
(nb this proposal does not form part of the Traffic Order and is an operational change only)
- k) Correct a historical anomaly to remove light and heavy goods vehicles from being permitted to park in Odd Down Coach Park.

2 Public consultation

- 2.1.1 A public consultation was held to advertise the proposals for the Traffic regulation Order over a period of one month between 25 August and 26 September 2022 and publicised digitally via the Council's website; twitter account; press release; direct email contact to all statutory consultees. In addition, the Notices of Intent were posted in all affected locations at tariff boards or points of public access to ensure that customers were informed of the proposals and had an opportunity to comment.
- 2.1.2 The consultation was due to close after the statutory three-week period; however, following the death of Queen Elizabeth II it was extended to ensure it closed the week after the period of mourning and state funeral to allow additional time for respondents to comment.
- 2.1.3 A web-based questionnaire was developed to seek the views from all stakeholders on the proposals.
- 2.1.4 Respondents were directed to the online consultation form to provide their feedback or could be provided with a paper copy to complete and send in upon request.
- 2.1.5 A dedicated mailbox was made available for stakeholders to use where they required clarification on any element of the proposals.

3 Consultation Response

3.1 Feedback generated

- 3.1.1 The online survey generated a total of 150 individual online responses, with all responses received by email being entered into the online survey. No postal responses were received.
- 3.1.2 The consultation analysis has involved 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.
- 3.1.3 The primary consultation question was focussed on whether a respondent supported, partially supported, or objected to the proposals.
- 3.1.4 Respondents were also asked the optional question to confirm which car park or permit type they used.
- 3.1.5 Respondents were asked if they considered themselves to be disabled or have (or use a vehicle with) a blue badge.
- 3.1.6 Respondents were asked to provide their postcode to allow identification of Bath & North East Somerset Resident and those that traveling to the Local Authority area.
- 3.1.7 No feedback was received that identified or highlighted that these proposals could have a negative or adverse impact on an individual or group in accordance with the Equalities Act 2010. An Equalities impact assessment was published as part of the consultation documentation.

4 Consultation Responses

4.1 General Characteristics

4.1.1 The on-line survey asked respondents to provide general information relating to their individual characteristics. The results are provided Figure 1 to Figure 4 and are based on the responses from 70 respondents (less than 47% of total respondents) who answered these questions.

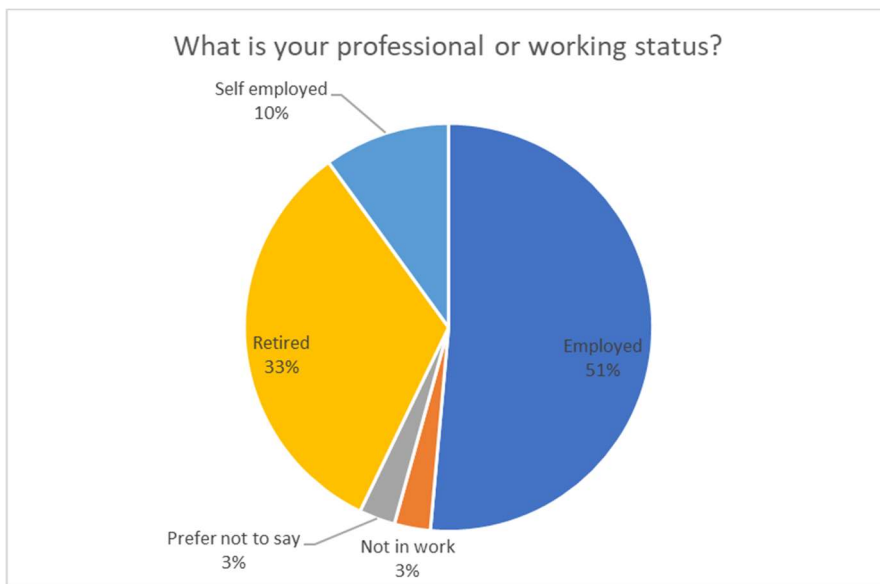


Figure 1 - Working status

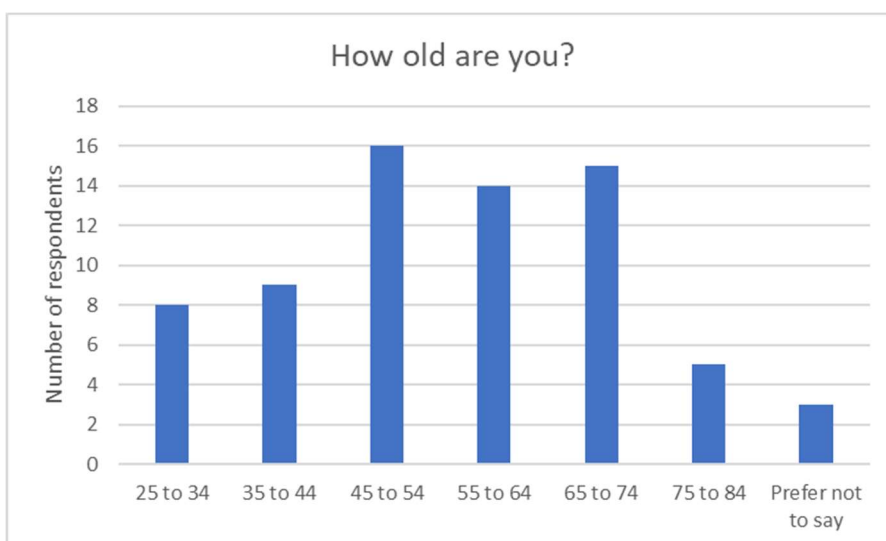


Figure 2 - Age

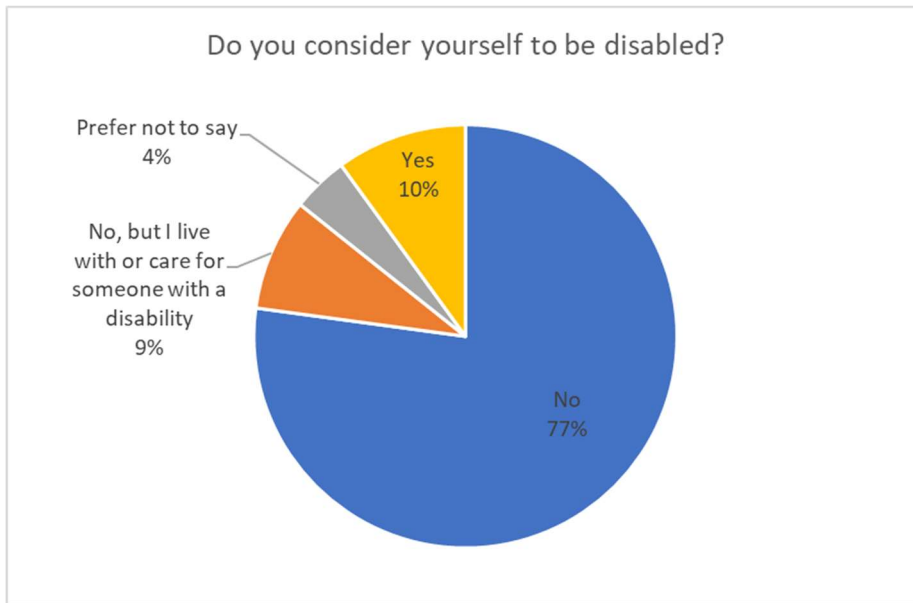


Figure 3 - Do you consider yourself to be disabled?

4.2 Response distribution

- 4.2.1 The majority of responses were from individuals that could be identified as living within the Bath & North East Somerset area (81% - 122 responses).
- 4.2.2 Of the remaining 19% (28 responses), 13% (20 responses) lived outside of Bath & North East Somerset and 5% (8 responses) did not provide sufficient data.
- 4.2.3 Figure 2 indicates that 71% of respondents are over the age of 45 with 53% over the age of 55. The 2011 census indicates that 43% of the B&NES adult population are over the age of 45 and 30% are over 55. It's worth noting that this census data is over 10 years old, the 2021 census data is not yet available at the time of this report.

Even accounting for the aging population in this 10-year period since the last census, and assuming there has not been a large movement of the population into or out of B&NES, the results indicate a disproportionate response rate amongst the over 45s than exists in the population. This is further evidenced by the zero-response rate amongst the under 25's, who comprise 16% of the B&NES population and are an age group with low car availability.

4.3 Presentation of results

- 4.3.1 Figure 4 shows the breakdown of the 150 responses received. A combined 28% (42 responses) were supportive or partially supportive of the proposals, compared to 72% (108 responses) who objected. The same ratio applies when comparing responses from only those respondents living within Bath & North East Somerset or those that lived outside Bath & North East Somerset (or could not be identified).
- 4.3.2 A higher proportion of objections is not an unexpected result given that the core tenet was to increase charges. Parking is an emotive subject for many people and the introduction or increase in any charges is never a popular option for customers, even where many may recognise the outcomes and benefits that this form of behaviour change is designed to encourage.

The council recognises the cost-of-living crisis and is sensitive to the current pressure on families, and whilst these proposals (where not correcting historical anomalies) broadly represent a below inflationary increase since 2010, they never less come at a sensitive time.

- 4.3.3 Further analysis was undertaken on responses from Bath & North East Somerset respondents to identify the Ward. The full results of this analysis are shown in Appendix 2. For ease of review these wards have been aggregated into the following groups which have been based loosely on the location of sites impacted by the proposals and the areas covered by the Off Street Traffic Regulation Orders:

- a) Bath area wards
- b) Keynsham area wards
- c) North East Somerset area wards

4.3.4 Figure 5 shows the outcome of this aggregated analysis, with an overall strong level of objection to the proposals. Keynsham respondents are notable by their lower overall apparent level of support; however, this contrasts with a much smaller sample of responses.

It's also worth noting that respondents may have perceived (as indicated by feedback) the increase in Keynsham more negatively due to the greater percentage increase against current charges comparatively with Bath. This should be considered in the context that proposed charges for Bath for an equivalent period (e.g. 2 hours) are 567% higher than those for Keynsham and the relative uplifts cannot therefore be considered as representative of their impact.

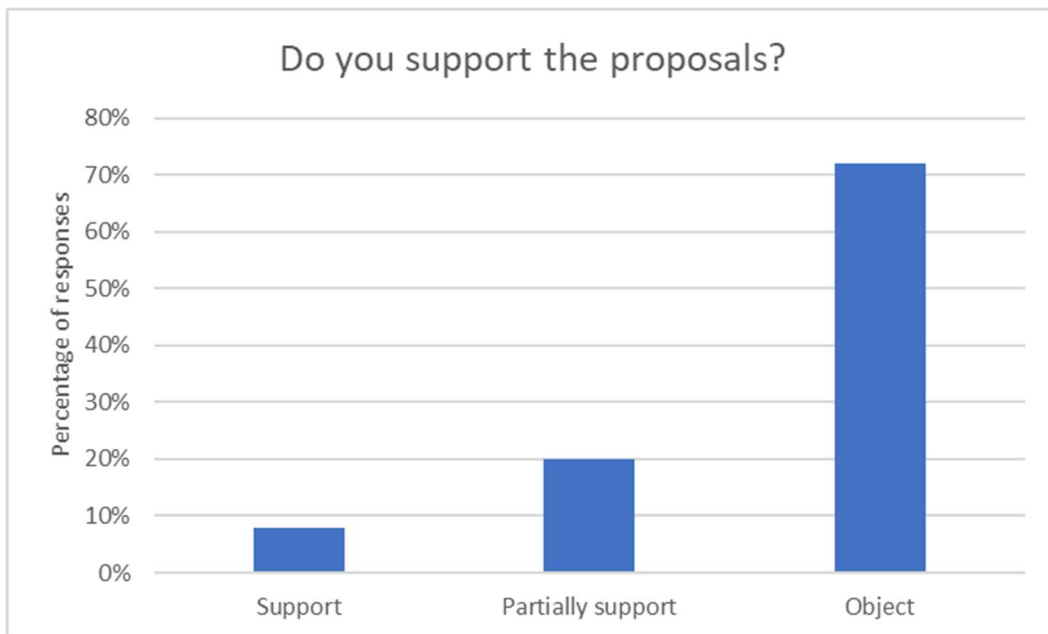


Figure 4 - Respondents results to the consultation question

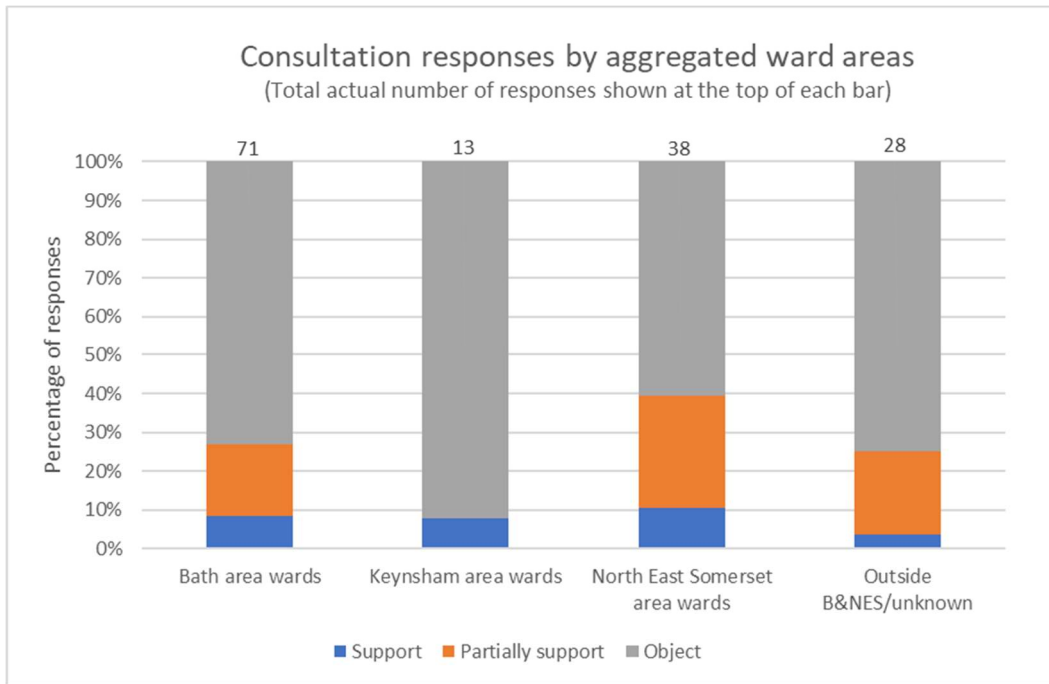


Figure 5 - Respondents results to the consultation question by aggregated ward area

4.3.5 Of the 150 responses, respondents frequently indicated they used more than one car park or permit type with 270 options recorded. There was a considerable range across the options recorded and the results have been separated into two groups for ease of review. Figure 6 shows those options which had the most responses each (up to almost 100) and Figure 7 shows those options with less than 10 responses.

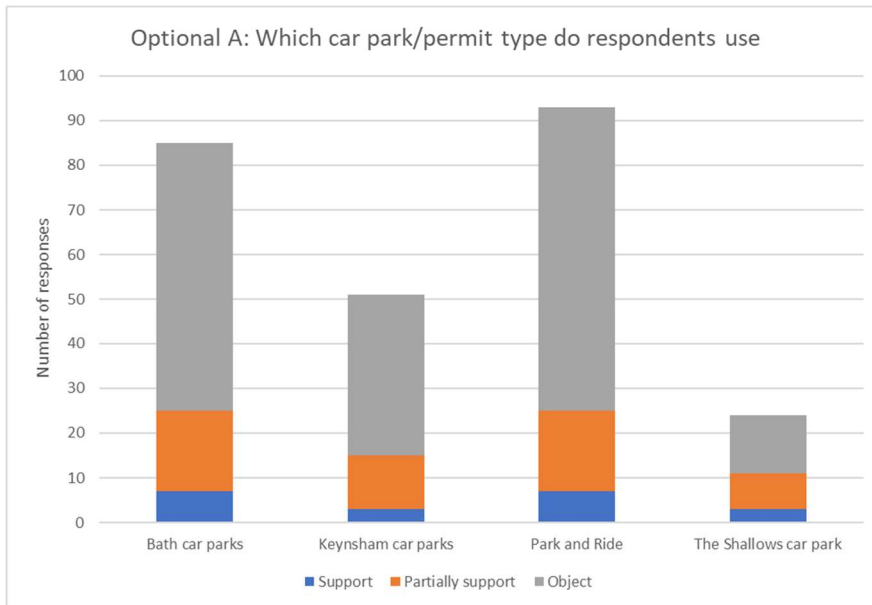


Figure 6 - Respondent results to the optional question on car park/permit use – part 1

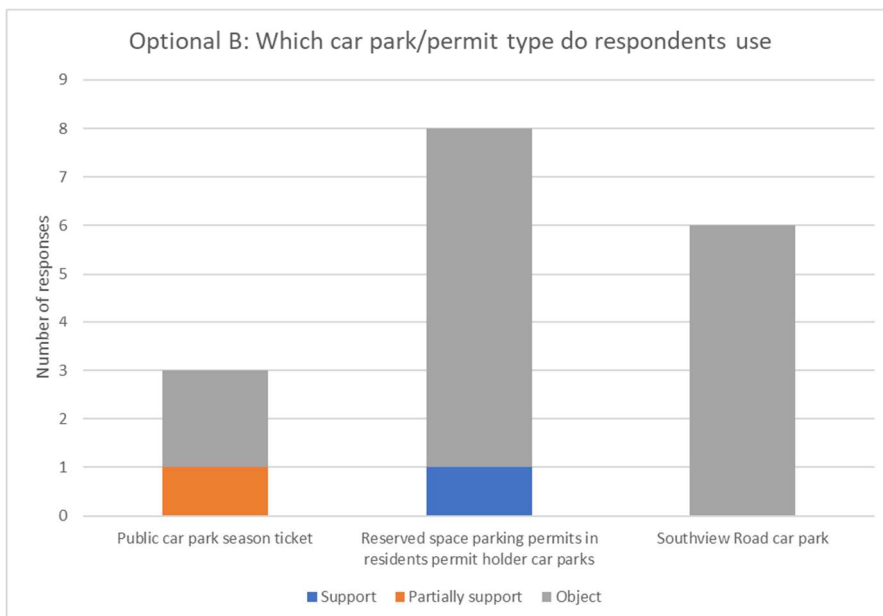


Figure 7 - Respondent results to the optional question on car park/permit use – part 2

4.4 Additional comments

4.4.1 Free-text comment boxes were provided to all respondents allowing them to provide further details or comment to support their response to the proposals.

4.4.2 Due to the number of responses received and the common themes that were identified within the additional comments from respondents, these have been grouped and a selection of key comments are included to summarise the issues raised (in no particular order) which is then followed by a B&NES officer response to the theme, issues, and opinions.

4.5 Car Parking Charges

4.5.1 Theme: **Cost**

Key Comments

- *Bath charges already too expensive – I choose to shop out of town as cheaper and puts people off coming here*
- *Charges already too high – cannot be justified at time of the cost-of-living crisis, no compelling rationale for increase. Timing insensitive and totally inappropriate*
- *Car park charges should not be more than operational cost of provision – people drive for legitimate reasons*
- *At a time of us entering a recession, increases in already extortionate car park charges will kill off remaining businesses in Bath*
- *Money raising exercise for Council*
- *Why no charges for Midsomer Norton/Radstock as previously proposed? When charges were introduced for Keynsham it was said that the introduction of charges for Midsomer Norton would be reviewed*
- *Keynsham High Street is still struggling to recover. 50% increase when Midsomer Norton is free is unacceptable – there should be no parking charges so Keynsham equal to Midsomer Norton*
- *Object to withdrawal of 10% resident parking saver concession – particularly for those in rural parts of BNES who travel into centre*
- *Parking charges should increase annually to discourage car use and increase other modes of travel*
- *Charges need to be higher to stop people driving into Bath and encourage use of P & R*
- *Keynsham car park charges too cheap compared to Bath*
- *50% increase at Keynsham too high. Will drive people elsewhere e.g. to Longwell Green and Kingswood where parking is free. Council should be supporting business and high streets to recover, especially after Covid.*
- *Don't support the new overnight charge from 8pm – this will encourage parking on street. Would support for those who do stay overnight e.g. after 2am when night time economy generally shuts down. Charge will put people off visiting in the evenings to the detriment of local business*

- *I support the small increase in charges at public car parks*

4.5.2 Theme: **Environmental impact/well-being**

Key Comments

- *Support increase in parking charges to reduce car use and greater use of public transport to address climate emergency, however no real alternatives available for many to use other modes of transport.*
- *Doing this in name of air quality and congestion is a cover for raising revenue*

4.5.3 Theme: **Public Transport/other modes of travel**

Key Comments

- *Need to improve public transport offer before raising parking charges – people will go elsewhere with cheaper parking*
- *Bus service routes and frequency of buses is being cut and services unreliable and expensive – disincentive to use alternative services*
- *Loss of bus services in rural locations force use of car travel*
- *Public transport and waiting places can feel unsafe – prefer to drive*
- *Park & Ride needs different pricing mechanism to incentivise use, especially for families/groups, shorter visits. Can still be cheaper to drive and use car parks.*
- *Object to the way Park & Ride is charged. Currently families, full cars or more than one person have to pay the bus fare per person – makes it expensive for more than one person and discourages use*
- *Where are the safe cycle and pedestrian routes as alternative to driving*
- *Park and Ride doesn't operate late enough for those visiting in the evening or early enough for retail workers who are then forced to use expensive parking*
- *Bath does not have a problem other than school run times – stop school drop off areas and provide bus hubs*

4.5.4 Theme: **Equalities**

Key Comments

- *Driving and being able to park is a lifeline for disabled people on low income as can't rely on suitable public transport, afford e-bikes or be able to use other active travel options.*
- *Once again, BNES are punishing the oldest, most infirm and disadvantaged. Charges are too expensive as they are and will affect poorest amongst us when we're all experiencing financial difficulties*

4.5.5 Officer Response

- a. As set out in section 1 of this report, these proposals have been developed to facilitate the strategic outcomes of local transport policy and align with the Council policy on Liveable Neighbourhood and the Journey to net zero. By reducing congestion on our roads, we aim to improve public transport journey times and improve air quality to secure the safer movement of pedestrian traffic, supporting increased take up of active travel.
- b. Improvements to public transport cannot typically be achieved by increasing the frequency of buses on an already congested network, further impacting the flow of vehicles, and discouraging motorists from switching away from private vehicles. This also serves to further undermine the viability of services by increasing costs without raising the revenue needed to operate them.
- c. Parking charges will always be emotive; however, they are a recognised and established mechanism to encourage behaviour change. These charges were last reviewed in 2018 alongside the adoption of the Parking Strategy 'Balancing your needs'. This previous review was itself the first review of off-street charges since 2010.
- d. Recent redevelopment within the historic core in Bath has seen changes to the availability of parking. The promotion of parking out of the city centre by prioritising sustainable transport such as the park and ride service (through increased city centre parking charges), ensures that the city, as a popular visitor destination and double UNESCO world Heritage site, remains accessible to all road users.
- e. The council recognises the cost-of-living crisis and is sensitive to the current pressure on families. These proposals (where not correcting historical anomalies) broadly represent a below inflationary increase since 2010.
- f. The 2018 review saw the introduction of a linear tariff structure across parking locations in Bath in order to ensure that long stay parking was not proportionally (on a per hour basis) cheaper than short stay parking, therefore incentivising the use of private vehicles for longer stay and commuter parking over more sustainable alternatives and active travel. The introduction of the linear tariff across all other chargeable council car parks, including those in Keynsham, ensures consistency with this approach helping to encourage travel for all day commuters and visitors by other more sustainable modes and increasing the availability of the limited parking capacity for shorter trips. This is in line with the objectives of Parking and Transport policy and the Climate and Ecological Emergency.

- g. The proposed charges for Keynsham reflect a modest price increase of 10p per hour in line with the same charge increase proposed for Bath. Whilst the baseline increased charge remains identical in real terms at 10p per hour, a 2 hour stay in a car park in Bath with the proposed charges is 567% higher than the equivalent stay in Keynsham. Therefore, any increase in the Keynsham charges when compared proportionally against Bath prices will indicate a significant and disproportionate uplift due to the much lower baseline charge in Keynsham and cannot be considered representative of the impact of the proposals.
- h. Prices are typically always rounded up to the nearest whole 10p to aid cash handling and minimise the number of low value coins in machines as this results in more frequent cash collections and therefore greater costs. It should be noted that a 5p per hour price increase (5p being the lowest value coin the machines can accept) would still represent an increase of 25% on the 2 hour stay in Keynsham when considered in percentage terms and this method is not considered an appropriate means of comparison due to the low baseline value. In addition to additional cash collections due to an increase in lower value coins being used, experience shows that some customers will perceive this as a mechanism to make them overpay due to a lack of exact change – a practice which is negatively received.
- i. The proposals approved by the Council's Cabinet on 11 February 2022 included an amendment to remove the proposals to introduce hourly based charging in Midsomer Norton and Radstock. The proposals as set out in this consultation reflect the objectives of the Parking Strategy objective PSO19, which states “- Parking in the rural areas of Bath and North East Somerset will remain free of charge where charges do not currently apply in order to support and improve the economic viability of these settlements”.
- j. The withdrawal of the Residents Parking Saver 10% discount for off street parking mirrors its withdrawal from on street parking charges on 6 January 2022. This discount disincentives motorists from using other more sustainable forms of transport, such as the park and ride.
- k. The overnight charge is designed to reflect the fact that council car parks remain open 24 hours a day and are regularly used during these times. The sites therefore incur costs for maintenance, lighting, CCTV, which must be funded to support these opening hours. This nominal charge is not expected to impact visitors who stay overnight as the 24-hour charge covers this overnight period.
- l. The Park and Ride service also provides a range of discounts that include;
- English National Concessionary Pass holders can travel for free after 09.00 Monday to Friday.
 - A group of two adults may purchase a discounted fare after 09.30 Monday to Friday.

- Regular service users can benefit from discounts when purchasing 10 single journeys one transaction (for use anytime).
 - up to 5 children (under 16) can travel for free with each fare paying adult.
- m. The new Park and Ride contract, which started on 28 August 2022, operates on a gross cost basis with the Council retaining future risk regarding service patronage and income from fares offsetting these costs. Therefore, additional income that can be raised through increased use of the service may present future opportunities to introduce additional and later services from the sites into the city centre.
- n. The council is recruiting for a Park & Ride Service and Commercial Lead who will be responsible for developing the three P&R sites in Bath to maximise the commercial value and promote sustainable travel in Bath, aligning with core policies such as the Journey to Net Zero.
- o. An equalities impact assessment has been completed in conjunction with these proposals to consider what impacts may be likely on different groups and what measures may be appropriate to mitigate any identified impact.

4.6 New Park and Ride car parking charge for non-bus users

4.6.1 Theme: Cost

Key Comments

- *Charges should apply for those who don't use the bus – its purpose is to park and ride. Should be charges to park and free to use P&R bus*
- *Charges will encourage parking in resident streets with additional congestion and pollution contrary to your policy aims– people park and walk or cycle to work/hospital/schools which avoids other car journeys*
- *Royal United Hospital workers are encouraged to park and stride from Newbridge P&R – will displace parking into local streets*
- *Parking at and around the RUH is expensive and at a premium. It makes more sense for those able to park at the underutilised Newbridge P & R car park and make the 10minute walk. Charging will exacerbate the difficulties of using our main hospital*
- *Proposed charge level insufficient given likely operating costs, doesn't incentivise use of P & R bus*
- *First hour should be free as in place at Royal Victoria Park*
- *P & R sites easy to use – don't put barriers in way with complex apps to identify whose using bus or not. How will you monitor?*
- *Strongly object to payment by cashless MiPermit system. Not all have phones and is discriminatory. Apps often have issues with signal/don't work leaving people frustrated. Should offer payment by card at machine.*

- *Sports fields at Lansdown P&R often used by the youth outside of peak hours whose households already financially burdened*

4.6.2 Theme: **Environmental Impact and well-being**

Key Comments

- *Will disincentivise those that park at P & R sites and then choose other active travel options for health and well-being, e.g. cycling, walking, sporting activities with increase in longer term health and mental health issues and costs. Close to other amenities such as Allotments*
- *Strongly object, will disincentivise use of community assets e.g. sporting and recreational playing fields and daily exercise – this is a stealth anti well-being tax.*
- *Strongly object – Lansdown playing fields used by grass roots football clubs by many residents and young people for football matches and practice – this contradicts BNES aims for the well being of the community with negative impact for health and well being*
Lansdown -there should be a safe drop off zone or free 20 minutes dropping off time to prevent unsafe parking/dropping off on road

4.6.3 Theme: **Public Transport**

Key Comments

- *Commuter issue likely only at Newbridge P & R, not needed at other sites*
- *P & R spaces always available – current system works, why change*
- *Space at Newbridge P & R can be limited*

4.6.4 Theme: **Equalities**

Key Comments

- *Will have impact for vulnerable groups who visit for leisure activities in the fresh air*

4.6.5 Officer Response

- a. The proposals for parking charges at the park and ride sites are only applicable to site users that do not use the park and ride service. The new Park and Ride contract, which started on 28 August 2022, operates on a gross cost basis with the Council retaining future risk regarding service patronage and income from fares offsetting these costs. Therefore, any use of the park and ride sites by motorists that are not fare paying passengers reduces the opportunity for fare paying passengers to use the service. This may risk the future viability of the service and the proposed nominal charges therefore offset this risk. Those using the bus service are not required to pay a parking charge.
- b. The nominal charges of £1 (up to 3 hours) and £2 (all day) are not anticipated to result in significant displacement or prevent access for use of recreational facilities for wellbeing due to the low cost and convenience of finding a space to park.
- c. It's recognised that the Park and Ride sites are typically only full at peak times or when there is an event held in the city. However, recent redevelopments within the historic core in Bath has seen changes to the availability of parking and the continued promotion of parking out of the city centre by prioritising sustainable transport such as the park and ride service will increase the pressure on spaces at other times of the year.
- d. The use of MiPermit to provide a cashless only parking offer ensures that operating costs are kept to a minimum and that no cash is left on site in machines that may be at risk of vandalism or theft.
- e. Card payment terminals require additional equipment and infrastructure which is costly to purchase, install and maintain. They also carry additional costs for each transaction, which can make them economically unviable for low value transactions. When used in remote locations it is also exposed to vandalism and attempts to hack devices which represent a security risk to customers.
- f. The Council is working with its suppliers and the park and ride service operator to ensure that park and ride service users will experience zero to minimal disruption in their use of these sites to ensure that there is no disincentive to the use of the park and ride for sustainable travel into Bath city centre.
- g. The Council cannot be responsible for technical issues experienced because of network infrastructure that it does not control (for example mobile signals). Should a motorist using the sites for parking only experience a problem that results in the issue of a Penalty Charge Notice (PCN), they may appeal to the Council, who has a duty to consider all mitigating circumstances. Should this appeal be unsuccessful, the motorist may exercise a further statutory right of appeal to the Traffic Penalty Tribunal. More information on this process is available online <https://beta.bathnes.gov.uk/challenging-parking-fine>.

- h. The park and ride sites can still be used by motorists for the purpose of picking up, or dropping off, passengers without a parking charge being required if this activity is reasonable. For example, it would be reasonable for a vehicle to be stationary for 10 minutes whilst waiting; however, it would not be reasonable for the motorist to remain parked with their vehicle without payment of the charge whilst their passenger attended an activity adjacent to the site.
- i. The Royal United Hospital in Bath manages its own private off street car park. The level of charges and duration of tariffs are not at the control of the Council, which must set charges for its car parks in accordance with statutory requirements.
- j. In 2021 the West of England Combined Authority (WECA) published the Local Cycling and Walking Infrastructure plan (LCWIP) which proposes capital investment of £411m by 2026. The Plan was a collaborative effort between the West of England councils, including B&NES, WECA and local stakeholder groups. It can be viewed at: <https://www.westofengland-ca.gov.uk/what-we-do/transport/local-cycling-and-walking-infrastructure-plan/>
- k. In April 2022, WECA was awarded £540m from the Department for Transport to improve the sustainable transport in the West of England, including public transport, walking, cycling, and wheeling. £129m will be spent in B&NES, matched by a £17m local contribution.
Details of the funding settlement and project scope can be found here: <https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/10/West-of-England-Combined-Authority-CRSTS.pdf>
- l. Work is now underway on delivering an extensive plan of active travel schemes across the district. Work is currently focused on delivering schemes outlined in the LCWIP plus schemes to encourage active travel as part of 3 major projects:
 - Bath city centre;
 - Bath to Bristol corridor; and
 - Somer Valley to Bristol and Bath (A37, A367 and A362 corridors).
- m. We've recently held public consultation on several active travel schemes and the following two schemes are currently being implemented (Further details can be found at: <https://beta.bathnes.gov.uk/active-travel/>):
 - A4 Upper Bristol Road: and
 - A36 Beckford Road
- n. An equalities impact assessment has been completed in conjunction with these proposals to consider what impacts may be likely on different groups and what measures may be appropriate to mitigate any identified impact.

4.7 Public car park season ticket charges

4.7.1 Theme: Cost

Key Comments

- *Increase of £150 represents a 37.4% increase at a time of unprecedented pressure for household budgets and cannot be justified in any context*
- *Season tickets should not be offered – Keynsham car parks are too cheap*
- *Doubling the cost of Keynsham car park season tickets to £39 per month is disgusting, how can you justify this? This will affect local workers and recruitment on high street, doubling cost will mean not worth them working here and at a time when we are working really hard to bring new custom to Keynsham*

4.7.2 Officer Response

- a. The current charges for season tickets significantly undermine attempts to encourage the use of more sustainable alternatives in direct contrast to the objectives of Parking and Transport Policy and the objectives of the Climate and Ecological Emergency due to their low price.
- b. The current discount against the equivalent daily charge across locations ranges from 43% to 70% percent. This has arisen because of a historic anomaly that has seen season ticket prices increased in isolation by a fixed percentage when daily P&D charges have been set separately, increasing the disparity at each review. This not only encourages private vehicle use amongst commuters but reduces the availability of space in council car parks to visitors, both those looking for short or long stay parking.
- c. The season ticket proposals still provide a significant discount of 35% against the equivalent daily charge if purchased each day.
- d. The provision of unreserved off street pay and display car parks by the council is in order to support the economic vibrancy and development of the local community. Whilst local residents are of course free to utilise these car parks, subject to compliance with the terms and conditions of use, they are not provided in order to facilitate convenient long-term parking of private vehicles where residents do not have private parking provision.

4.8 Reserved space parking permits in resident permit holder car parks

4.8.1 Theme: Cost

Key Comments

- *The increase for a resident who is not increasing car usage is 37.4%. This is not the first rise for 12 years and exceeds inflation rate. With the cost of living crisis and everything going up, how can you justify 37.4% increase on the basis this is more sustainable.*

4.8.2 Officer Response

- a. The cost of reserved space parking permits in resident permit holder car parks was last reviewed and increased in 2018 following the adoption of the Parking Strategy 'Balancing your needs'.
- b. It's acknowledged that this is an above inflation price rise; however, historically the charges for these permits, which provide dedicated off street parking for the permit holder in the city centre (or close to it) have been undervalued. It should be noted that on street residents parking permits do not guarantee parking within the zone. These permits therefore provide the holder with effectively reserved parking in the city centre for the proposed daily equivalent charge £1.50 per day. This is a significant discount against the charges available in the Council's public car parks.

4.9 Seasonal charges at The Shallows car park Saltford

4.9.1 Theme: *Cost*

Key Comments

- *Support charging but need to park for longer durations e.g.8 hours. Very few good access points to River Avon for canoeists and kayakers – The Shallows is a good location but insufficient parking.*
- *Support proposals to introduce a time limit at the car park. 30p per hour to park will not reduce number of vehicles parking but is a source of income for the council. This is a token fee and gesture the council is doing something to address issues the area faces but nothing will change.*
- *Strongly support charges and time limitations to help increase turnover, location popular to variety of visitors, particularly in summer, car park often full for the day early in the morning with other visitors parking on double yellow lines or resident only spaces causing issues. Vans often park for weeks and don't move.*
- *Money should only be generated from those who ignore reasonable limitations and are fined. A fairer way is to have 2hour free parking as a suitable time to enjoy the area*

4.9.2 Theme: *Enforcement*

Key Comments

- *Issues at this area are due to lack of enforcement of existing parking restrictions and people parking on grass. People will ignore new restrictions given number that flout current ones and get away with it*
- *River leisure businesses operate from the car park, often attracting 12 – 15 paddleboarders parking for the day in the car park at expense of others. Proposals will give the council powers to address problematic issues*
- *Without enforcement charges may make things worse in locality. The current 5 spaces on the highway between the car park and toilets (parking currently free for up to 3 hours) should be changed to the same charges and terms and conditions as proposed for the car park if goes ahead*
- *... need for B&NES Council to introduce measures to prevent parking on the green amenity space surrounding the car park... Preventative parking measures ... need to be located around the perimeter of the car park and along sections of grass areas parallel to the pavement/highway, with drop bollards in the south-west corner for ... emergency services ... access*
(nb this comment has been edited to ensure it remains anonymous)
- *[We ask that] the parking bay lines and disabled parking bay markings are repainted at The Shallows car park and that the car park is added to the street sweeping schedule so markings can be clearly seen by users.*

4.9.3 Theme: **Environmental and well-being**

Key Comments

- *Several outdoor groups use this location and car park to provide recreational courses and coaching at nominal fee (e.g. paddle boarding, rowing & kayaking). Some groups organise litter picking events to improve the environment. If introduced will no longer be able to use location*
- *This is a public area where local homeowners have done all they can to prevent the public using this area*
- *The Shallows is only access point to the river for paddle boards & canoes. Limiting parking to 3 hours will prevent many from benefiting in use of the river between bath and Bristol and associated recreational benefits.*
- *Car park supports families and individuals accessing the water, picnicking and spending time. Restricting use for certain peak times is draconian*
- *Access to the river is crucial for members of the public for recreation and business. Outdoor recreation has been proven to boost wellbeing – adding a time limit and fee will greatly decrease this benefit and enjoyment of the river*

4.9.4 Officer Response

- a. A three-hour tariff is typically considered to be the longest duration stay for a short stay car park where the tariff is set to encourage turnover of the spaces which increases the opportunities for visitors arriving by vehicle to enjoy the local amenity for recreation purposes. Increasing the duration of parking stays would therefore reduce the flexibility of the car park and the number of people that could benefit from the amenities available.
- b. The introduction of these charges, or the requirement to activate a free stay during the off-peak season, will aid more effective enforcement of the new short duration stays. This will help to ensure improved compliance and increase the turnover of the limited spaces available to ensure visitors can enjoy this local amenity.
- c. These proposals relate to the council's off-street parking orders only. Restrictions on the public highway are controlled by different regulations and therefore are not included within this proposal.
- d. Parking charges can be proposed for the limited waiting bays on the public highway at a future review of the appropriate on street order if this is required, noting that this will facilitate more effective management and enforcement of the 3-hour limited waiting restriction.
- e. The council is currently investigating the ownership of the land adjacent to the car park to determine the feasibility of implementing physical measures to deter contraventions of the no waiting restriction (double yellow lines) by vehicles that are parked on the grass adjacent to the car park.
- f. The markings within the car park were refreshed on 29 September 2022 as part of routine maintenance and inspection of the site.
- g. Businesses wishing to operate from the car park must do so with the express written permission of the Council. No licences have been issued and therefore any businesses using a vehicle to operate from this car park may be in contravention of the off street parking order and their vehicle may be issued with a Penalty Charge Notice (PCN). The operation of a business from this car park reduces the availability of spaces for visitors to park to enjoy the local amenity.

4.10 Permit Holders only parking - Southview Road car park Bath

4.10.1 Theme: **Cost**

Key Comments

- *Reason for introducing charges are not valid. Restricting use of this car park will only impact surrounding street parking. South view road is narrow with raised pavement on parking side, further restricting parking for residents of the street.*

Will cause chaos and penalise those on low incomes at time of cost of living crisis. Proposal simply charging for a much needed facility

- *Location useful when on street parking full*

4.10.2 Officer Response

- a. Introduction of permits for this car park will prevent the use of the car park by commuters and those that do not live within 500m of the site. This will help to relieve pressure from the limited availability of on street parking along these narrow streets and provide dedicated parking for those that live nearby.
- b.** The council recognises the cost-of-living crisis and is sensitive to the current pressure on families. These permits provide the holder with effectively reserved parking in the city centre for the proposed daily equivalent charge £1.50 per day.

5 Summary & Recommendations

- 5.1.1 On 11 February 2022, as part of the budget setting process, the Council's Cabinet approved proposals put forward following a review of car parking and car park permit charges. These proposals are set out in section 1.2.1 of this report, with all but one of the proposals (proposal j) requiring a variation of the Council's off street traffic regulation orders.
- 5.1.2 The proposals were developed to facilitate the strategic outcomes of local transport policy and align with the Council policy on Liveable Neighbourhood and the Journey to net zero. By reducing congestion on our roads, the aim is to improve public transport journey times and improve air quality to secure the safer movement of pedestrian traffic, supporting increased take up of active travel.
- 5.1.3 The consultation set out the Council's proposals and was advertised in the local press and at each site impacted by the new charges. The consultation was live for a total period of 31 days following an extension added after the death of Queen Elizabeth II.
- 5.1.4 The online survey generated 150 individual responses.
- 5.1.5 Parking charges will always be emotive and formed a core tenet of these proposals. It was therefore not unexpected that the overall view of respondents would be against the new charges, with only 28% percent of responses being supportive or partially supportive.
- 5.1.6 Comments were received from respondents, and these raised a range of themes and issues which have been responded to within this report
- 5.1.7 An equalities impact assessment was completed in conjunction with these proposals to consider what impacts may be likely on different groups and what measures may be appropriate to mitigate any identified impact. No updates were required following consideration of the consultation responses.
- 5.1.8 After consideration of the results and feedback from respondents, it is recommended that the variations to the two Off Street Traffic Regulation Orders are implemented as proposed
- 5.1.9 Whilst not part of the Traffic Regulation Order, it is recommended that the proposal included within the consultation to remove the 10p MiPermit fee is reviewed separately before the operational decision to implement this change is taken. This is to ensure the proposal aligns with budget proposals to be considered by the Council's Cabinet for 2023/24.

Appendix 1 – Proposals in detail

Proposed Bath car park charges

Current:

		Hours available									
		1	2	3	4	5	6	7	8	10	24
Bath - Standard	Long Stay										
	Avon Street	£ -	£ 3.20	£ 4.80	£ 6.40	£ -	£ 9.60	£ -	£ 12.80	£ -	£ 15.00
	Charlotte Street	£ -	£ -	£ -	£ 6.40	£ -	£ 9.60	£ -	£ -	£ -	£ 15.00
	Manvers Street	£ -	£ 3.20	£ 4.80	£ 6.40	£ -	£ 9.60	£ -	£ 12.80	£ -	£ 15.00
	Short Stay										
	Bath Sports and Leisure Centre	£ 1.60	£ 3.20	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -
	Broad Street	£ 1.60	£ 3.20	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -
	Cattle Market	£ 1.60	£ 3.20	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -
	Claverton Street	£ 1.60	£ 3.20	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
	Green Park Road	£ -	£ -	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -
Kingsmead Square	£ 1.60	£ 3.20	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -	
Bath - Residents discount	Long Stay										
	Avon Street	£ -	£ 2.88	£ 4.32	£ 5.76	£ -	£ 8.64	£ -	£ 11.52	£ -	£ 13.50
	Charlotte Street	£ -	£ -	£ -	£ 5.76	£ -	£ 8.64	£ -	£ -	£ -	£ 13.50
	Manvers Street	£ -	£ 2.88	£ 4.32	£ 5.76	£ -	£ 8.64	£ -	£ 11.52	£ -	£ 13.50
	Short Stay										
	Bath Sports and Leisure Centre	£ 1.44	£ 2.88	£ 4.32	£ 5.76	£ -	£ -	£ -	£ -	£ -	£ -
	Broad Street	£ 1.44	£ 2.88	£ 4.32	£ 5.76	£ -	£ -	£ -	£ -	£ -	£ -
	Cattle Market	£ 1.44	£ 2.88	£ 4.32	£ 5.76	£ -	£ -	£ -	£ -	£ -	£ -
	Claverton Street	£ 1.44	£ 2.88	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -
	Green Park Road*	£ -	£ 3.20	£ 4.80	£ 6.40	£ -	£ -	£ -	£ -	£ -	£ -
Kingsmead Square	£ 1.44	£ 2.88	£ 4.32	£ 5.76	£ -	£ -	£ -	£ -	£ -	£ -	

Charges apply 08.00 to 20.00, 7 days a week.

Evening charge tariff available at Charlotte Street car park of £1.50 between 6pm and 8pm.

Proposed:

		Hours available									
		1	2	3	4	5	6	7	8	10	24
Long Stay											
Avon Street	£ -	£ 3.40	£ 5.10	£ 6.80	£ -	£ 10.20	£ -	£ 13.60	£ -	£ 17.10	
Charlotte Street	£ -	£ -	£ -	£ 6.80	£ -	£ 10.20	£ -	£ -	£ -	£ 17.10	
Manvers Street	£ -	£ 3.40	£ 5.10	£ 6.80	£ -	£ 10.20	£ -	£ 13.60	£ -	£ 17.10	
Short Stay											
Bath Sports and Leisure Centre	£ 1.70	£ 3.40	£ 5.10	£ 6.80	£ -	£ -	£ -	£ -	£ -	£ -	
Broad Street	£ 1.70	£ 3.40	£ 5.10	£ 6.80	£ -	£ -	£ -	£ -	£ -	£ -	
Cattle Market	£ 1.70	£ 3.40	£ 5.10	£ 6.80	£ -	£ -	£ -	£ -	£ -	£ -	
Claverton Street	£ 1.70	£ 3.40	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	
Green Park Road	£ -	£ 3.40	£ 5.10	£ 6.80	£ -	£ -	£ -	£ -	£ -	£ -	
Kingsmead Square	£ 1.70	£ 3.40	£ 5.10	£ 6.80	£ -	£ -	£ -	£ -	£ -	£ -	

Proposed charges in the table above apply 08.00 to 20.00 7 days a week.

A new Overnight Tariff (20.00 to 08.00) is proposed for all the above chargeable locations of £1.50 per night per vehicle (per bay). Evening charge tariff remains available at Charlotte Street car park of £1.50 between 6pm and 8pm.

Additional notes:

1. Removal of the residents parking saver 10% discount
2. An all day stay (24 hours) will include the overnight charge and expire 24 hours after first purchased.

Proposed Keynsham car park charges

Current:

		Hours available									
		1	2	3	4	5	6	7	8	10	
Keynsham Standard	Long Stay										
	Bath Hill East	£ -	£ 0.40	£ -	£ 0.90	£ -	£ -	£ -	£ 1.60	£ 2.10	
	Fox and Hounds	£ -	£ 0.40	£ -	£ 0.90	£ -	£ -	£ -	£ 1.60	£ 2.10	
	Station Road	£ -	£ 0.40	£ -	£ 0.90	£ -	£ -	£ -	£ 1.60	£ 2.10	
	The Labbot South	£ -	£ 0.40	£ -	£ 0.90	£ -	£ -	£ -	£ 1.60	£ 2.10	
	Short Stay										
	Ashton Way	£ -	£ 0.40	£ -	£ 0.90	£ -	£ -	£ -	£ -	£ -	
	Ashton Way East	£ -	£ 0.40	£ 0.60	£ 0.90	£ -	£ -	£ -	£ -	£ -	
	Civic Centre	£ -	£ 0.40	£ -	£ -	£ -	£ -	£ -	£ -	£ -	

Proposed:

		Hours available									
		1	2	3	4	5	6	7	8	10	
Keynsham Standard	Long Stay										
	Bath Hill East	£ -	£ 0.60	£ -	£ 1.20	£ -	£ -	£ -	£ 2.40	£ 3.00	
	Fox and Hounds	£ -	£ 0.60	£ -	£ 1.20	£ -	£ -	£ -	£ 2.40	£ 3.00	
	Station Road	£ -	£ 0.60	£ -	£ 1.20	£ -	£ -	£ -	£ 2.40	£ 3.00	
	The Labbot South	£ -	£ 0.60	£ -	£ 1.20	£ -	£ -	£ -	£ 2.40	£ 3.00	
	Short Stay										
	Ashton Way	£ -	£ 0.60	£ -	£ 1.20	£ -	£ -	£ -	£ -	£ -	
	Ashton Way East	£ -	£ 0.60	£ 0.90	£ 1.20	£ -	£ -	£ -	£ -	£ -	
	Civic Centre	£ -	£ 0.60	£ -	£ -	£ -	£ -	£ -	£ -	£ -	

Additional notes:

1. New linear per hour charging structure.
2. 10p MiPermit convenience fee removed to align with on street charges.

Proposed car park season ticket charges

Current:

	1 month	3 months	6 months	12 months
Public Car Parks - Non reserved spaces				
Avon Street (Mon-Fri)	£ 170.14	£ 510.40	£ 1,020.80	£ 2,041.60
Manvers Street (Mon-Fri)	£ 170.14	£ 510.40	£ 1,020.80	£ 2,041.60
Charlotte Street (Mon -Fri)	£ 116.69	£ 350.08	£ 700.15	£ 1,400.30
Charlotte Street (7 day)	£ 135.58	£ 408.38	£ 816.75	£ 1,633.50
Keynsham Long Stay (7 day)	£ 19.80	£ 60.50	£ 115.50	£ 231.00
Public Car Parks - Reserved spaces				
Charlotte Street (Mon -Fri)	£ 202.13	£ 606.38	£ 1,212.75	£ 2,425.50
Charlotte Street (7 day)	£ 231.00	£ 693.00	£ 1,386.00	£ 2,772.00

Proposed:

1. Reserved parking bay season tickets no longer offered; all reserved bays returned to general use when current live permits expire.
2. Proposed charges for unreserved season tickets are indicative only, the proposals base the new charges on 35% discount against the daily rate for the location, with an allowance 20 days annual

leave by the holder per year for Mon-Fri permits only:

$$\text{annual season ticket charge} = (\text{Chargeable days} * \text{daily charge}) * (1 - 0.35)$$

NB Chargeable Days:

Mon Fri permits - 20 per month

7 day permits - 30.4 per month

	1 month	3 months	6 months	12 months
Public Car Parks - Non reserved spaces				
Avon Street (Mon-Fri)	£ 222.30	£ 666.90	£ 1,333.80	£ 2,667.60
Manvers Street (Mon-Fri)	£ 222.30	£ 666.90	£ 1,333.80	£ 2,667.60
Charlotte Street (Mon -Fri)	£ 222.30	£ 666.90	£ 1,333.80	£ 2,667.60
Charlotte Street (7 day)	£ 337.16	£ 1,011.47	£ 2,022.93	£ 4,045.86
Keynsham Long Stay (7 day)	£ 39.00	£ 117.00	£ 234.00	£ 468.00
Public Car Parks - Reserved spaces				
Charlotte Street (Mon -Fri)	Permits no longer available			
Charlotte Street (7 day)				

Nb this table is indicative of the charges only

Proposed new tariff to facilitate electric vehicle charging in long stay car parks

- New exclusive tariff for electric vehicles only for use when charging in Bath long stay car parks, in marked Electric vehicle charging bays.
 - Facilitates the use of rapid charge locations where a customer can only charge for a maximum of 90 minutes before additional charges are applied via their charging scheme membership.
- New tariffs available via MiPermit only.
- Charge set at the equivalent per hour rate (see appendix 1) with tariffs of 1 and 2 hours only (see table below showing indicates charges based on the proposals within Appendix 1):

	Hours available	
	1	2
Long Stay		
Avon Street	£ 1.70	£ 3.40
Charlotte Street	£ 1.70	£ 3.40
Manvers Street	£ 1.70	£ 3.40

Proposed reserved space parking permits in residents permit holder only car parks

Current:

	6 months	12 months
Residents car parks (7 days a week)		
Bedford Street	£ 200.75	£ 401.50
Brougham Hayes	£ 123.75	£ 247.50
James Street West	£ 200.75	£ 401.50
London Street	£ 200.75	£ 401.50
Business Permits (7 days a week)		
Bedford Street	£ 310.75	£ 621.50
James Street West	£ 310.75	£ 621.50
London Street	£ 310.75	£ 621.50

Proposed:

	6 months	12 months
Residents car parks (7 days a week)		
Bedford Street	£ 273.75	£ 547.50
Brougham Hayes	£ 273.75	£ 547.50
James Street West	£ 273.75	£ 547.50
London Street	£ 273.75	£ 547.50
Business Permits (7 days a week)		
Bedford Street	£ 365.00	£ 730.00
James Street West	£ 365.00	£ 730.00
London Street	£ 365.00	£ 730.00

Additional notes:

1. Business permits may not be available for purchase in all locations depending on overall permit demand at a location.

Proposed permit holders only parking for Southview Road car park, Bath

- Introduction of permit holders only parking at Southview Road car park, Oldfield Park.
- The car park has 20 marked spaces and is currently unrestricted parking.
- As this location is not adopted highway it cannot be utilised for additional resident permit provision within the proposed RPZ.
- Permits charges are in line with those proposed in Appendix 5.

	6 months	12 months
Residents car parks (7 days a week)		
Southview Road	£ 273.75	£ 547.50

Proposed new seasonal parking charges at The Shallows car park in Saltford

- Introduction of paid for parking charges for short stay durations at this car park to help manage turnover, particularly during peak periods.
- Charges are seasonal:

- 1st April through to 30th September – Charges apply.
- 1st October to 31 March – free of charge.
- The chargeable period is to cover 8am to 8pm 7 days a week.
- No return of 4 hours applies all year round.
- A free stay during October to March still requires a free activation via MiPermit.
- Payment only via cashless parking with MiPermit.
- Charges based on proposed charges for Keynsham (Appendix 2), as below:

	Hours available		
	1	2	3
1 April to 30 September	£ 0.30	£ 0.60	£ 0.90
1 October to 31 March	£ -	£ -	£ -

Proposed new charges for parking at Park and Ride car parks for those not using the park and ride service

- New charges introduced at Park and Rides sites for motorists that do not use the park and ride service.
- Payment only via cashless parking with MiPermit.
- Parking is free of charge to customers that use the Park and Ride service.
- Tariff and charges proposed operate midnight to midnight:

	Hours available	
	3	all day
Lansdown Park and Ride	£ 1.00	£ 2.00
Newbridge Park and Ride	£ 1.00	£ 2.00
Odd Down Park and Ride	£ 1.00	£ 2.00

Appendix 2 – Breakdown of results by location of respondent

		Support	Partially support	Object	Total
Bath area wards	Bathwick	1	2		3
	Kingsmead	2	1	11	14
	Lambridge			4	4
	Lansdown	1		3	4
	Moorlands			2	2
	Newbridge		2	8	10
	Odd Down		1	3	4
	Southdown	1	1	1	3
	Twerton			4	4
	Walcot			1	1
	Westmoreland			8	8
	Weston		5	5	10
	Widcombe & Lyncombe	1	1	2	4
	Coombe Down				
	Oldfield Park				
Keynsham area wards	Keynsham East			5	5
	Keynsham North	1		2	3
	Keynsham South			5	5
North East Somerset area wards	Bathavon North			1	1
	Bathavon South			2	2
	Clutton & Farmborough			5	5
	High Littleton		1	1	2
	Mendip			1	1
	Paulton		1	3	4
	Peasedown		3	4	7
	Radstock		1	1	2
	Saltford	2	4	2	8
	Timsbury	2	1	3	6
	Publow & Whitchurch				
	Chew Valley				
	Midsomer Norton North				
	Midsomer Norton Redfield				
	Westfield				
Total of B&NES respondents		11	24	87	122
	Outside B&NES	1	4	15	20
	location not identifiable		2	6	8
Grand Total		12	30	108	150

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