

From: [REDACTED]
To: [Baths Quays Links](#)
Subject: consultation 25-052 "Bath City Centre walking, wheeling and cycling proposals - statutory consultation"
Date: 11 December 2025 12:48:48
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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Dear sir/madam

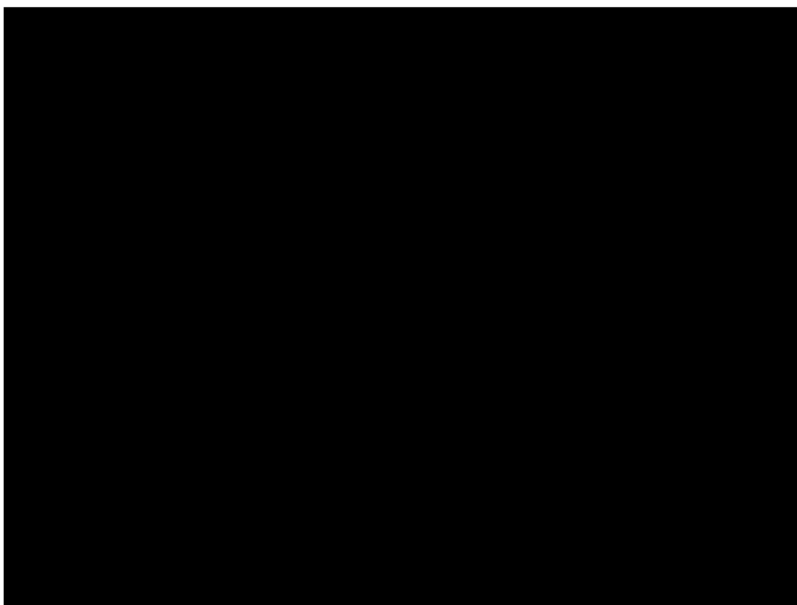
I am making a representation with regards to the consultation 25-052 'Bath City Centre walking, wheeling and cycling proposals – statutory consultation'. My representations are based on experience of Bath and other cities that have largely pedestrianised city centres and encouraged cycling. For example, I visited [REDACTED], Milan, Italy. The city had an excellent tram system from the airport to the city and from the outskirts into the City Centre making car hire unnecessary. There were 2 things that blighted the experience. Firstly, was the amount of graffiti plastered on any property whether occupied or not, roadside walls, street furniture etc on the routes into the Centre ghettoising the localities the trams passed through. The second blight was the pedestrian areas in the city centre where cyclists had little regard to pedestrians and cycled through at will. This tainted the experience of Milan and left me with the dissatisfaction that the problem was being ignored which further encouraged cyclists to act irresponsibly, break the law and show a lack of respect to the very people that the pedestrianisation of the City Centre had the intention of serving. Milan had good cycle routes through the centre but these were ignored where it was easier for cyclists to cut through the pedestrian routes.

Bath is already blighted by the amount of delivery moped riders (and scooters) that can be regularly observed riding through the city centre illegally. For example, by riding across the pavement at Kingsmead Square, cutting across the road and onto the pavement by the Bus Station, riding up one-way streets, occupying the cycle refuges at traffic lights, turning right into James Street West at the 'Sainsbury' junction to cite a few examples. As regards cycling we already experience a disregard for responsible cycling which includes cycling after dark with no lights, cutting across pedestrian crossings, cycling on pavements and through red lights at will.

I trust it is apparent from my observations of other cities and our own that encouraging more cycling in the City Centre will, without adequate measures that must include distinct

cycle routes from pedestrian (not hybrid routes) supported by enforcement with fines on the cyclists, moped and scooter riders that choose to abuse and illegally occupy the pedestrianisation of the City Centre if this is where it is heading. Bath already has an unacceptable problem with 2 wheel transport in its city centre that it is failing to address so to encourage further 2 wheel use it must be supported by the provision of an effective policy that enforces legal and responsible use of its roads, cycle and pedestrian routes. Bath lacks this now, it needs it now and will need it even more if ignored.

Regards,



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[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [Baths Quays Links](#)
Subject: OBJECTION - TRO Consultation
Date: 11 December 2025 12:36:19

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Hi there,

I am writing to object to the plans proposed for specifically the works on Charles Street.

[REDACTED] have been here for nearly 30 years.

We are in prime position for feedback as [REDACTED] we see the traffic every single day.

The thought of putting in a cycle/no stopping outside our shop is daunting and worrying as we receive very large deliveries [REDACTED], which are not easy to unload and unpack, so forcing delivery drivers into different areas we feel may jeopardize our business.

The first lane outside our shop tends to be the lane that flows to allow traffic to turn left on to St Pauls Place/Monmouth Place and the next lane which leads in to Queens Square is the problem lane, mainly due to the already poor traffic control in Queens Square. So to even think of taking this lane away and pushing all the traffic in to the other lane will just create an awful back log down Green Park Road and Midland Bridge Road, preventing drivers from using this lane to turn left and find alternative routes.

The new police station opposite us being built will also feel the problems of increased traffic around the area, unsure if they will have response vehicles at this location, but if they do they will be stuck when the queues come, which they will.

We already feel the cycle lanes on Upper Bristol Road are a failure, driving on them 6 days a week, as soon as a bus pulls over, the traffic really struggles to get past as there is not enough room to safely overtake because of the bollards in place all the way along that road, also we have witnessed this stopping emergency services multiple times, awful planning in our eyes. No problem with the cycle lanes whatsoever but to obstruct traffic with the bollards, emergency services, and public transport is preposterous in our eyes.

City's are built on business and tourism, and recently it seems like any plans have only been to hinder the performance of these, don't even get me started on the levy planned for tourists.

We really struggle to see how damaging businesses and delivery drivers daily lives helps anybody, all for the sake of cyclists just doesn't sit well.

Businesses wouldn't exist without easy access to deliveries and customers, all which your planning to make even more difficult then it already is in this city.

There is already a cycle lane on the opposite pavement to us, and that pavement has ample space to allow it to be constructed better and safer for cyclists and pedestrians with proper signage and lanes as it isn't very clear currently.

We hopefully look forward to a response and welcome more feedback, but could not be more opposed to these plans.

Kind regards, [REDACTED]

From: [REDACTED]
To: [Baths Quays Links](#)
Subject: princes st
Date: 12 December 2025 09:19:26
Attachments: [1000065413.png](#)

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hi, regarding your proposals for the Bath City centre project (which i fully support)
I would ask that you consider installing a camera at the corner of Beauford Squire / Princes St

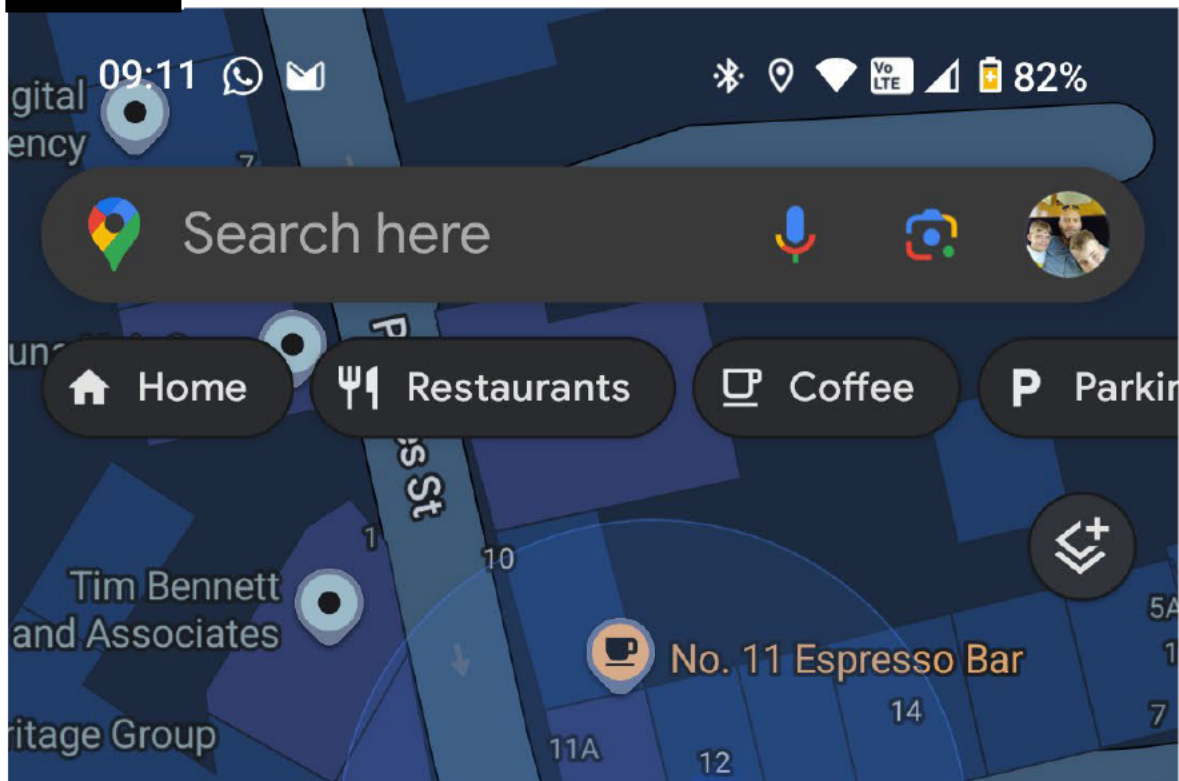
[REDACTED] at the corner (see attached) and there are dozens of mopeds and cars who enter Princes St on a daily basis (from Monmouth St) despite it being a no entry / one way street...

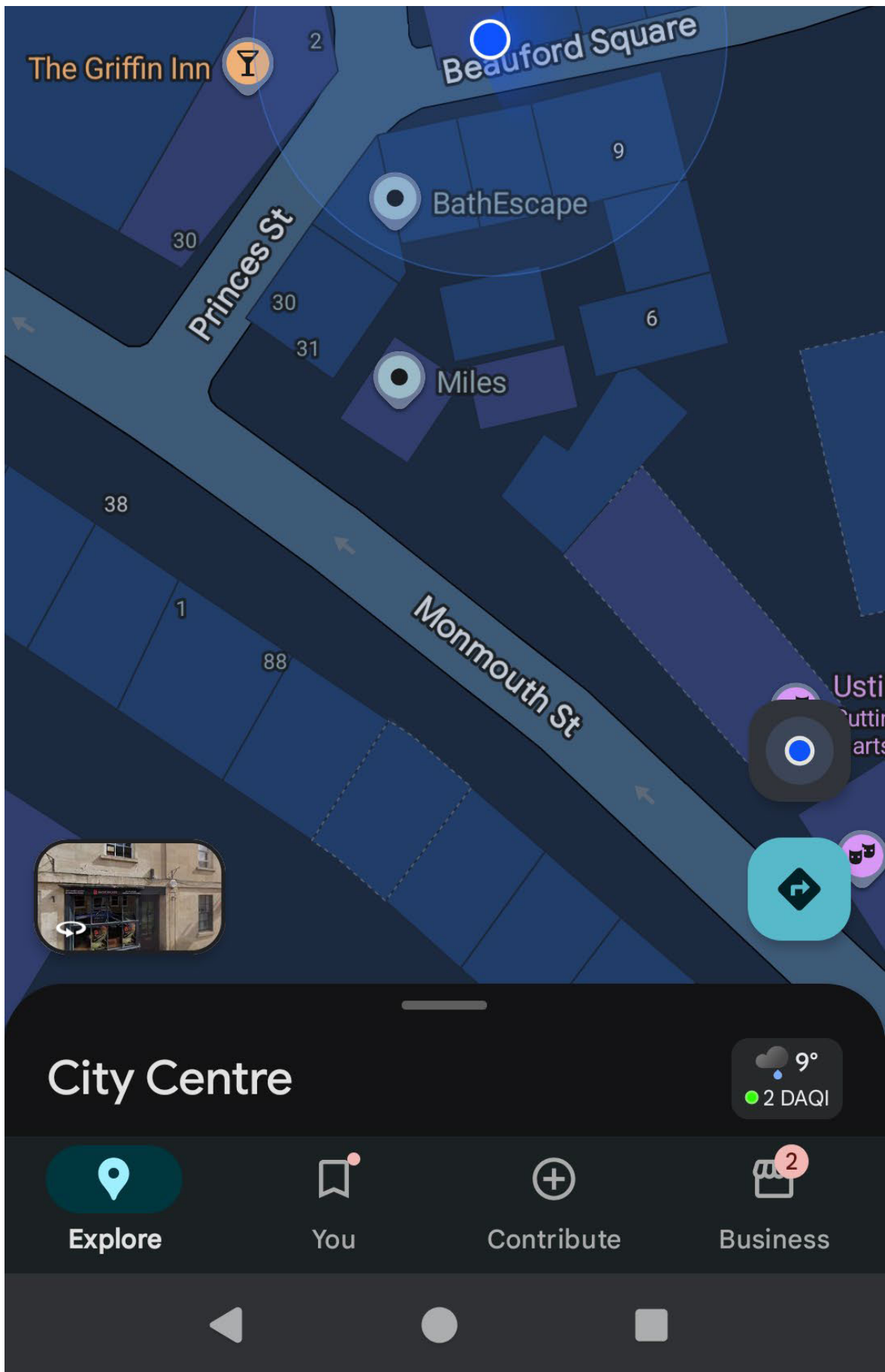
I have filmed and report a number of these drivers to Avon and Somerset police.and these people jave been dealt with on an individual basis but they are unable to assist with the wider issue of people wilfully ignoring the NO ENTRY signs...

Thank you

[REDACTED]

[REDACTED]





Sent from [Proton Mail](#) for Android.

From: [REDACTED]
To: [Baths Quays Links](#)
Subject: TRO Ref. 25-052 VARIOUS ROADS, CENTRAL AREA, BATH, PROHIBITION OF STOPPING, WAITING, LOADING AND PARKING PLACES
Date: 08 January 2026 14:36:18
Attachments: [3174 The Min Bath Technical Note Servicing Deliveries Nov25_Final.pdf](#)
[3174 26.01.07 Upper Borough Walls TRO 25-052_PEP Reps_Final.pdf](#)

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Dear Sir / Madam,

We write [REDACTED]
[REDACTED] and attach a letter of objection to the proposed Traffic Regulation Order for the prohibition of stopping, waiting, loading and parking places on various roads in Bath central area, including on Upper Borough Walls.

Thank you for the opportunity to comment on the proposed Traffic Regulation Orders and we would appreciate it if you could confirm that you have received this objection. We would appreciate the opportunity to discuss further.

Kind regards

[REDACTED]

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Peter Evans Partnership

Transport Planning & Highway Consultants

7th January 2026

Our Ref: 3174/JRC

Traffic Management Team
Bath and North East Somerset Council
Lewis House
Manvers Street
BATH, BA1 1JG

Dear Sir / Madam

PERMANENT TRAFFIC REGULATION ORDER, UPPER BOROUGH WALLS – TRO REF 25-052

We are writing on behalf of the owner of the former Mineral Hospital on Upper Borough Walls (UBW), Bath, Fragrance UK – Bath Limited' ("Fragrance"). This is to **object** to the current Bath and North Somerset Council (BANES) Traffic Regulation Order (TRO) 25-052 consultation on parking, loading and movement restrictions, to facilitate the delivery of the City Region Sustainable Transport Settlements (CRSTS) Phase 1 scheme to introduce and rationalise walking and cycling infrastructure across Bath city centre, including on UBW.

We wish to maintain dialogue with BANES and its officers to ensure Fragrance's interests are being considered and discuss how we can assist with the process. We would like to ensure the permitted redevelopment of the Mineral Hospital to a hotel is viable for Fragrance, by effectively accommodating servicing and deliveries without detriment to the wider road network, road users and movement of people in the city centre. On this basis, our representation should be considered as constructive criticism of the TRO proposals.

Background and Context

Fragrance has owned the former Mineral Hospital site since 2018 and received planning permission on 10th November 2021 for the redevelopment of the hospital for a 160 bedroom hotel in (planning ref. 21/01752/FUL). The planning permission has been subsequently amended by two s.73 variations, but these have not changed the highway design on Upper Borough Walls (UBW) or principle of access, servicing or deliveries associated with the proposed hotel. The planning permission that is in the process of being implemented is 25/00415/VAR.

At the time planning application 21/01752/FUL was granted, the strategy accepted by BANES was that an existing loading bay on the frontage of the West block of the application site on UBW allowing loading between 24:00 and 12:00 was to be used for servicing and deliveries associated with the hotel. There was additionally an ambulance bay in front of the West block on UBW and it was proposed this could also be changed to a loading bay. This demonstrates that two loading areas were originally envisaged in front of the West wing of the hotel. Fragrance agreed to contribute £4,351 towards the cost of a TRO for BANES to provide a loading bay adjacent to the hotel on UBW.

Fragrance also agreed as part of the s.106 Agreement for the hotel planning permission to make a £250,000 contribution to "*improvements*" to UBW public realm, as part of the Council's Bath High Street Renewal programme and/or the City Centre Security Scheme. In making this contribution there was an expectation that explicit provision for servicing, along with other public realm enhancements, would be delivered at UBW in consultation with Fragrance's Design Team.

2-10 Kings Parade Mews, Clifton, Bristol BS8 2RE Tel: 0117 973 4355
mail@pep-bristol.co.uk www.pep-bristol.co.uk

Peter Evans Partnership Limited.

Directors: Andrew J Kenyon BEng FCIHT Hilary R Vaughan BEng CEng MICE FCIHT Mark E Callaghan MCIHT

Associates: Helen M Stephens BSc MCIHT James Chequer BA(Hons) Dip TP MRTPI MCIHT MCILT MSoRSA

Registered in England and Wales No.4373557. Registered Office: 2-10 Kings Parade Mews, Clifton, Bristol BS8 2RE.

CRSTS Phase 1

Since September 2024, Fragrance and its Design Team have raised concerns with BANES / WSP that its CRSTS Phase 1 scheme, does not take into account the servicing and delivery requirements for the approved hotel or surrounding businesses. This has subsequently been confirmed by the draft TRO 25-052 consultation. The concerns have been raised at meetings between Fragrance and BANES / WSP on 25th September 2024 and 6th November 2025 in addition to written representations and submissions that have been directly made to the BANES / WSP design team.

PEP on behalf of Fragrance prepared the enclosed Technical Note to set out the hotel servicing and delivery requirements and need for loading bays on UBW that are **essential** for the development of the permitted hotel to progress and for its ultimate operation. This was submitted to the BANES / WSP design team on 6th November 2025. This note sets out the following:

- The permitted hotel scheme and its extensive servicing and delivery requirements;
- The existing challenging situation on UBW including servicing and deliveries that take place on UBW;
- The CRSTS Phase 1 scheme and insufficient servicing and delivery arrangements for the hotel and surrounding retail/ hospitality/ other businesses; and
- Additional loading bay options suggested by PEP/Fragrance that could be delivered as part of the CRSTS Phase 1 scheme.

For Fragrance to progress with the permitted hotel development, it must be able to operate efficiently in terms of the multitude of deliveries it would receive daily such as linen, food and beverage, and the items to be collected from site such as laundry and refuse, and we believe this can be achieved without detriment to the wider road network, road users and the movement of people in the city centre. This would have been factored in and was implicit when granting Fragrance planning consent and in agreeing the related s.106 contributions (loading bay and improvements to UBW).

The CRSTS Phase 1 scheme and by association the TRO 25-052 proposals should take account of the permitted development scheme at the former Mineral Hospital and the servicing arrangements previously agreed with BANES pursuant to planning permission 21/01752/FUL (as subsequently amended).

As part of the CRSTS Phase 1 scheme it is also necessary to take account of and to coordinate with the external lighting of the proposed hotel to ensure that UBW is safe for all activities, including the functional requirements of the permitted hotel. The UBW lighting should also be coordinated with the emerging façade lighting proposals that are currently the subject of pre-application discussions with the LPA (Ref:25/04618/PA02), to preserve / enhance listed building setting and amenity for all users of UBW.

TRO 25-052 Consultation

We understand from the TRO 25-052 consultation that it is the intention to modify the parking and loading restrictions on UBW outside the former Mineral Hospital so there is no waiting or loading at any time, which Fragrance feel is unnecessarily restrictive and will mean their development is potentially unimplementable.

There is only one loading place proposed opposite the East Block of the former Mineral Hospital where loading and unloading can take place for a maximum of 20 minutes. This is a commercially unrealistic solution and must be revisited to allow the city centre businesses to function and Fragrance's development to progress.

The pressure on this one loading bay will be enormous, and the extremely short period of time allowed will only exacerbate the issue. The proposals will simply not be able to accommodate servicing and deliveries for the hotel, let alone surrounding retail/ hospitality/ other businesses.

It is clear from observations that servicing and deliveries currently take place on the southern side of UBW outside the former Mineral Hospital, where waiting, but not loading, is prohibited, in addition to the informal loading bay between Union Street and Old Bond Street.

The objections to the TRO proposals are set out in the following pages in the context of the Council's Statement of Reasons (SOR) and Road Traffic Regulation Act 1984.

Objection: Road Traffic Regulation Act 1984 Section 1

The lack of loading bays will lead to congestion and cause highway safety issues, contrary to the TRO SOR and Section 1(1)(a), (c) and (f) of the Road Traffic Regulation Act 1984, which state:

'(a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising.

(c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians)..

(f). for preserving or improving the amenities of the area through which the road runs

Servicing already takes place on UBW for the surrounding retail/ hospitality/ other businesses within the existing informal loading bay and also on the carriageway adjacent to the former Mineral Hospital, where waiting, but not loading, is prohibited. Access to UBW for servicing is already restricted to the time period between 18:00 and 10:00 by the City Centre Security Scheme, and need not be restricted further.

By restricting the available loading areas for the servicing associated with the permitted hotel and the surrounding businesses, these activities will inevitably continue to occur out of functional necessity, but take place in an unplanned manner outside of the one marked loading bay in ad hoc and inappropriate locations, such as on footways. This will impact on the safety and amenity of the area and pedestrians and cyclists using UBW.

Please refer to the enclosed Technical Note which identified several potential solutions for additional loading bays alongside the CRSTS Phase 1 scheme without detriment to pedestrian or cyclist movements or safety. This would help manage the servicing requirements of city centre businesses while preserving the amenity of the area.

These preferred options provide a suitably sized loading bay for the proposed hotel and other local businesses without narrowing the footway but at the same time maintain a carriageway width for vehicles and contra flow cycling consistent with the BANES/WSP arrangement. They also allow for good forward visibility for contra flow cyclists passing any stopped vehicle.

The options put forward would cause less danger to road users compared to the potential ad hoc and illegal loading and unloading that could occur within the CRSTS Phase 1 / TRO 25-052 scheme. They would also allow the suitable passage of cyclists, pedestrians and other road users and would improve the amenity of the area compared to the unlawful loading and unloading that would inevitably occur within the CRSTS Phase 1 / TRO 25-052 scheme.

Objection: Road Traffic Regulation Act 1984 Section 122

The TRO SOR also refers to Section 122(1) of the Road Traffic Regulation Act 1984 and how BANES meets its duty under this section to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians). However, we do not agree with the Council that it has satisfactorily discharged its duty based on the reasons given, on the following basis:

(a) the desirability of securing and maintaining reasonable access to premises

BANES states the scheme has no impact on access to premises. However, the TRO scheme will impact on the servicing and delivery access to the permitted hotel and the surrounding businesses, who can currently use UBW outside the former Mineral Hospital for short term loading and unloading. There would not be capacity in the single loading bay proposed, without detriment to the safety and movements of other road users including pedestrians and cyclists.

(b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run

The proposed TRO would not preserve or improve the amenity of the area, as deliveries and servicing take place at present on UBW including outside the former Mineral Hospital and are already restricted to the time period between 18:00 and 10:00 by the City Centre Security Scheme. The TRO proposals would cause greater harm as these loading and unloading activities will continue to occur, but take place outside of the one marked loading bay in ad hoc and inappropriate locations, such as on footways, which would impact on the amenity of the area and safety of pedestrians and cyclists using UBW. The options presented in the enclosed Technical Note would preserve the amenity by helping manage the location of servicing and deliveries and fit well into the street scape maintaining the desired pedestrian and cyclist movements.

(bb) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy)

The TRO proposal would cause greater harm to congestion and air quality as the current loading and unloading activities will continue to occur, but take place outside of the one marked loading bay and cause congestion, delays in servicing activities and therefore greater vehicle emissions in ad hoc and inappropriate locations over a wider area. The presented options would not impact on the actual or desired pedestrian or cyclist movements, as the designs still allow for suitable pedestrian and cyclist movements.

(c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles

UBW is not a route for public service vehicles, but some pedestrians would be walking to or from bus stops. The PEP/ Fragrance scheme options for UBW would impact on the actual or desired pedestrian or movements, whereas the TRO proposal would result in servicing and deliveries in ad hoc and inappropriate locations over a wider area, which would have a detrimental impact on pedestrian movements to / from bus stops and the safety of the public.

(d) any other matters appearing to the local authority to be relevant

BANES did not identify any other matters. However, as noted above, BANES should take into account the intense servicing requirements of the permitted development scheme at the former Mineral Hospital. The TRO proposals are contrary to the delivery and servicing strategy agreed with BANES as part of the planning permission for the hotel, including the s.106 contributions towards the TRO and public realm improvements on UBW. It is also worth noting the statutory requirement under heritage legislation to ensure that the design, materials and lighting preserve or enhance the setting of the Grade II* Mineral Hospital Site and this part of the Bath Conservation Area. Under provision for and chaotic servicing and drop offs will not allow for a street scape that preserves or enhances the setting of what Fragrance hope to be a sensitive, yet commercially viable, transformation of a beautiful Grade II* building.

Summary

Fragrance object to the draft TRO 25-052 proposals. As currently drafted, the TRO proposal threatens the viability of permitted hotel development.

The TRO 25-052 proposals and CRSTS Phase 1 scheme bans all loading from UBW, except at one loading bay which could not service the hotel, let alone surrounding businesses. The lack of loading bays will lead to congestion and cause highway safety issues, meaning additional loading bays are necessary for UBW to function and for Fragrance's development to continue. PEP/Fragrance have identified options for this as part of the enclosed Technical Note.

The CRSTS Phase 1 scheme should take account of the permitted development scheme at the former Mineral Hospital and the servicing arrangements agreed with BANES. Additionally, the street lighting for the CRSTS Phase 1 scheme should also be coordinated with the external lighting for the permitted hotel development to ensure safety for hotel operations and for all road users, and to enhance the amenity of UBW and listed building setting.

The TRO and public realm s.106 funding from the hotel application could still be used as intended to install the required loading bays which are essential for the operation of the permitted hotel and to improve UBW public realm for all users, as well as to enhance the setting of the Grade II* listed hotel.

Notwithstanding our client's objection to the TRO proposals, as currently proposed, we respectfully request that the Council works proactively with Fragrance's Design Team to address the critical servicing requirements before the TRO and CRSTS Phase 1 scheme are finalised.

Yours faithfully



Encl: PEP Technical Note on Servicing and Deliveries November 2025

Hotel Redevelopment of the Former Mineral Water Hospital, Upper Borough Walls, Bath

TECHNICAL NOTE ON HOTEL SERVICING AND DELIVERIES

1.0 INTRODUCTION

1.1 Purpose of Note

- 1.1.1 This note has been prepared to set out the hotel servicing and delivery requirements and need for loading bays on Upper Borough Walls (“UBW”) that are essential for operation of the permitted hotel (LPA Ref: 25/00415/VAR).
- 1.1.2 It follows a meeting between the applicant, Fragrance UK- Bath Limited, and its design team and BANES and its consultants WSP on 6th November 2025, on the City Region Sustainable Transport Settlements (CRSTS) Phase 1 scheme, which proposes to introduce and rationalise walking and cycling infrastructure across Bath city centre including on UBW.
- 1.1.3 An original meeting was held between Fragrance and its design team and BANES and WSP on 25th September 2024 regarding the CRSTS scheme. At that meeting and in a subsequent e-mail, Fragrance and design team raised their concerns with the BANES/WSP proposed design for UBW as follows:
 - Service Bay – Significant concerns were expressed about the capacity of a single layby to adequately service adjoining business, the trade stalls in Stall Street and the permitted 160 bed hotel. A new loading bay adjacent to the proposed hotel was advised as an essential requirement;
 - West Wing – Main Hotel Entrance - taxi / disabled drop off, potential conflict with contraflow cycle lane;
 - East Wing – Hotel / Spa Entrance – pedestrian safety for those entering and leaving given the stepped entrance. Very narrow pavement adjacent to contraflow cycle lane; and
 - General - Concerns about the potential for proposals to affect the setting of the grade II* listed building at street level if appropriate materials, signage and street furniture were not carefully controlled.

1.1.4 Given these concerns, Fragrance requested that B&NES / WECA project team consider further the following:

- Incorporation of an additional service layby for hotel, similar to the previous ambulance bay, a sketch design option was also presented;
- UBW to remain as pedestrian priority shared surface with no cycle lane markings;
- Consider localised widening of pavement outside of East Wing;
- Consider a frontage threshold within / across UBW aligned with main entrance to denote threshold to hotel (instead of raised link shown from Trim Street); and
- Coordination of the design of the junction with northern end of the resurfaced Parsonage Lane.

1.1.5 Fragrance and the design team are concerned that BANES / WSP has not taken on board these previous comments and the additional loading bay on UBW is not being provided in the CRSTS Phase 1 scheme. This would significantly impact on the feasibility of adequately servicing the hotel, in addition to the adjoining business who rely on UBW for deliveries and servicing.

1.1.6 This note sets out the planning background and hotel operational requirements to highlight the need for the additional loading bays on UBW. It also shows how new loading bays could be incorporated into the CRSTS Phase 1 scheme.

1.2 Planning Permission

1.2.1 Planning permission was granted for the redevelopment of the hospital for a 160 bedroom hotel in November 2021 (ref. 21/01752/FUL). The planning permission has been subsequently amended by two s.73 variations. The permission that is in the process of being implemented is 25/00415/VAR. No highway related design changes were made under the variations but a Deed of Variation to the s.106 has changed the payment timing of the commuted sum contributions pursuant to the TRO and UBW public realm works to commencement of the Main Contract, which is identified as Phase B2 in the approved Phasing Plan.

1.2.2 Peter Evans Partnership (PEP) prepared a Transport Statement (TS) dated February 2021 for the original planning application submission.

1.2.3 At the time the planning application was granted, there was a loading bay on the frontage of the West block of the application site on Upper Borough Walls allowing loading between 24:00 and 12:00, that was proposed to be used. There was also an ambulance bay in front of the West block on UBW. With the closure of the hospital, the ambulance bay on UBW became redundant and it was proposed this could be changed to a loading bay.

- 1.2.4 There was no deliveries or servicing proposed via Parsonage Lane, all deliveries and servicing would take place from UBW. Improvements to the public realm on Parsonage Lane were agreed to enhance the environment for pedestrians.
- 1.2.5 The parking and loading bay and restrictions presented in the TS are shown on the drawing as Attachment 1.
- 1.2.6 Traffic surveys carried out in 2019 as part of the planning application process, showed there were the following number of goods vehicles recorded stopping on UBW outside The Mineral Hospital over a 24-hour period. These deliveries are now taking place within a shorter timeframe due to the city centre traffic restrictions between 10:00 and 18:00.
 - Upper Borough Walls (west of Parsonage Lane) = 32
 - Upper Borough Walls (east of Parsonage Lane) = 39
- 1.2.7 There were instances recorded where large goods for the hospital and bins were trolleyed or pushed along the UBW carriageway and along Parsonage Lane.
- 1.2.8 The Council were developing its city centre security project at the time and it was proposed that the Council would amend the TROs (Traffic Regulation Orders) as part of the intended security proposals. At the time the planning application was granted a final scheme had not been approved by the council. As there was uncertainty regarding the security scheme, Fragrance agreed to contribute £4,351 towards the cost of a TRO for BANES to provide a loading bay adjacent to the hotel on UBW.
- 1.2.9 Subsequent discussions with BANES acknowledged that the s.106 agreement has made provision for a TRO contribution and a public realm contribution to UBW. The Fragrance client and design team had therefore expected the CRSTS to make explicit provision for the required loading bay on UBW.

1.3 Existing Situation

Upper Borough Walls

- 1.3.1 The security scheme is now in place and UBW, Cheap Street, Westgate Street and Saw Close are closed to all vehicles between 10:00 and 18:00, except for blue badge holders. However, the loading and parking bays on UBW have now been removed. There are double yellow line parking restrictions, but not loading restrictions, along the site frontage on the southern side of UBW.
- 1.3.2 The closest loading bay is on Barton Street approximately 90m from the site. BANES has installed new loading bays on Westgate Buildings to help mitigate the loss of loading facilities around UBW / Westgate Street, some 225m from the site.

- 1.3.3 The photograph below shows the servicing and deliveries recently taking place on UBW on a Monday morning before 10:00.



Parsonage Lane

- 1.3.4 Parsonage Lane is a side road between UBW and Westgate Street, which served the rear parking area for the Mineral Hospital and several residential units.
- 1.3.5 Immediately south of the priority junction with UBW, Parsonage Lane passes under a bridged section of the former Mineral Hospital which links the western block of the hospital to the east. There is some 4.5m clearance.
- 1.3.6 Parsonage Lane has a 1m wide footway on the east side of the road and the carriageway varies between some 3m at its narrowest points at the northern and southern ends of the road and 4.5m at its widest point adjacent to the site car park. There are double yellow lines on both sides of the carriageway.
- 1.3.7 Turning radii and visibility are restricted at the junctions at both ends of Parsonage Lane. There is damage to kerbs, bollards and fencing which borders the former Mineral Hospital building, due to vehicle overrun and strikes.

2.0 HOTEL SERVICING AND DELIVERIES

2.1 Servicing Strategy

2.1.1 It was agreed with the Highway Authority during the original planning application process that the ambulance bay was no longer necessary. At this stage in the planning process PEP advised that servicing would be undertaken from UBW, in a similar manner to the arrangements when the hospital was operating, and that future coordination would be required in respect of the required TROs. However, the vehicle restrictions on UBW mean that servicing would generally take place between the hours of 18:00 and 10:00.

2.1.2 Vehicles would stop on UBW adjacent to the hotel and goods would be wheeled along the footway using trolleys in a similar manner to the arrangements for the hospital, to the stores and back of house area accessed at the north west corner of the eastern hotel block, or to the restaurant entrance on Parsonage Lane. Staff would be notified when the vehicles would be arriving to have everything prepared.

2.1.3 The planning application identified the following number of service vehicles were estimated to be associated with the hotel throughout a typical week.

Delivery type	Number per week
Linen / Laundry	5-6
Food and beverage and other consumables	3-4
Refuse Collection (commercial)	2

2.1.4 We have now reviewed hotel operations and estimate the following due to storage restrictions internally and the operational requirements for just-in-time deliveries:

Delivery type	Number per week
Linen / Laundry	7
Food	4-5
Beverage	2
Refuse Collection (commercial - food, glass, general waste)	5
Other deliveries	5

NB estimated 5/6 deliveries/collections per day of varying sizes. Some via large articulated lorries.

- 2.1.5 The hotel and health spa would be run by a single operator, with complete control over all uses on the site. The deliveries and servicing can therefore be managed through the individual arrangements with each supplier or contractor. This would include a management system whereby the timings of deliveries can be scheduled and staff made aware of when the vehicles would arrive in order to prepare the site; in addition to advising the supplier / contractor on the size of vehicle that would be best suited to serve the hotel.
- 2.1.6 The restaurant / café at the hotel will likely be operated by the same entity but there is a possibility it may be a separate commercial operation. If that were the case, there would be a close relationship with the hotel to manage the timings of deliveries as far as possible. Deliveries and servicing for the restaurant / café would also take place on UBW.
- 2.1.7 There will be regular instances where fresh deliveries will need to be made during the day in vehicles of varying sizes. With the security restrictions in place on UBW, these deliveries would stop at one of the existing loading bays on the roads outside of this perimeter. The closest is on Barton Street approximately 90m from the site. Goods would be carried or wheeled along the footway using trolleys. This occurs at present to local businesses and residents.
- 2.1.8 Refuse and waste would typically be collected approximately five times per week from UBW. Bin storage facilities for the hotel, health spa and restaurant / café are proposed in the basement of the western hotel block with direct access to Parsonage Lane via a goods lift. Bins would be moved along Parsonage Lane to UBW on the day of collection and returned immediately after the refuse is collected, in a similar manner to the previous hospital operations.
- 2.1.9 The moving of bins or trolleys on the footway and carriageway is not unusual in constrained city centre environments. Given that the alternative would be to have large vehicles reversing along Parsonage Lane, this option is considered to be the better solution and similar to the current arrangements.

3.0 BATH CITY CENTRE CITY REGION SUSTAINABLE TRANSPORT SETTLEMENTS (CRSTS) PHASE 1

- 3.1.1 The CRSTS Phase 1 is to introduce and rationalise walking and cycling infrastructure across Bath city centre, from Green Park Road in the west to Pulteney Bridge in the east, including changes to UBW.
- 3.1.2 The current proposals prepared by WSP for UBW include provision for contra flow cycling, widening the footway in front of the West block of the site and new informal pedestrian crossing adjacent to Parsonage Lane, and waiting and loading restrictions on both sides of UBW.

3.1.3 There are no loading bays proposed on UBW adjacent to the West block of the site. A loading bay is proposed on the northern side of UBW opposite the East block of the site, subject to structural assessment of the sub station below. The loading bay is some 15m long and 1.8m deep. It is partly within the carriageway. With an HGV parked in the loading bay there would be an effective carriageway width of approximately 3m. This loading bay would be for all local businesses including those on UBW, Union Street, Old Bond Street and Burton Street.

3.1.4 The WSP drawing is included as Attachment 2.

4.0 ASSESSMENT OF SERVICING AND DELIVERY ARRANGEMENTS

4.1 Existing Highway Arrangement

4.1.1 Servicing, loading and unloading for the proposed hotel could take place on UBW as part of the current highway layout, between 18:00 and 10:00. There are double yellow line parking restrictions on the south side of UBW adjacent to the West block, but short term loading and unloading would be permitted.

4.1.2 If Fragrance commence Phase 2 of their consented works, they have agreed as part of the s.106 Agreement to make part payment of a £250,000 contribution to “improvements” to Upper Borough Walls Public Realm. In making this contribution there was an expectation that explicit provision for servicing along with other public realm enhancements would be delivered at UBW in consultation with Fragrance’s Design Team.

4.2 CRSTS Phase 1

4.2.1 The CRSTS Phase 1 would not permit any loading or unloading on UBW, except in one dedicated loading bay opposite the East block of the site next to Old Bond Street and Burton Street, but this is not guaranteed.

4.2.2 The single loading bay opposite the East block would not be sufficient for the level of servicing and delivery activity that currently and in the future would take place on UBW. Delivery and servicing can only take place between the hours of 18:00 and 10:00 and there would be pressure on the one loading bay during the restricted time period, leading to congestion and potential highway safety issues with vehicles attempting to stop on the footway or in inappropriate locations.

4.2.3 It would not be practical to service the hotel if the delivery and servicing arrangements are not in accordance with the planning permission and the provision of a loading bay adjacent to the site on UBW is required.

4.2.4 Parsonage Lane would not be suitable for any alternative delivery operations associated with a hotel, for the following reasons:

- It is too narrow for large vehicles and there is evidence of vehicles overrunning the kerbs and also striking adjacent bollards and fencing;
- Large vehicles would only be able to reverse into Parsonage Lane and would have to reverse some 20m to serve the hotel, which on a narrow street shared with pedestrians is a safety concern; and
- Improvements are being made to Parsonage Lane as part of the hotel proposal. Any new road surfacing and kerbing would be damaged by regular use by large vehicles and the use of Parsonage Lane by large delivery vehicles would not complement the public realm and pedestrian enhancements.

4.3 CRSTS Phase 1 – PEP/Fragrance Proposals

4.3.1 PEP has reviewed the WSP proposals and has identified options for providing a dedicated loading facility on UBW adjacent to the former Mineral Hospital within the CRSTS Phase 1 scheme. A new loading bay could be provided on UBW and Fragrance has funded a TRO and public realm contribution for these work, as noted above.

4.3.2 The PEP option drawings are included as Attachment 3 and include:

- Option 1 - an off carriageway loading bay within the widened footway outside the West block.
- Option 2 - a loading bay and disabled bay partly within the footway and partly within the carriageway.
- Option 3 - a loading bay partly within the footway and partly within the carriageway.
- Option 4 - a loading bay and disabled bay partly within the footway and partly within the carriageway on either side of the West block entrance.

Option 1

4.3.3 The off carriageway loading bay would be within the proposed widened footway and flush with the footway. This would be 20m long and 2.7m wide. It would narrow the footway adjacent to the West block in front of the proposed hotel entrance, but as it is flush it would be shared and open for use by pedestrians when not needed for loading. A carriageway width of 4m would be retained past the loading bay, which would allow a vehicle to comfortably pass a cyclist.

Option 2

- 4.3.4 A partial on street loading bay is also shown on the PEP drawings, together with a disabled parking bay. These are positioned at the western end of the West block away from the building entrance. This arrangement would provide a further benefit with the disabled parking bay, as there is no parking for blue badge holders on UBW.
- 4.3.5 The loading bay would be 22m long and 2.7m wide. It would retain a 1.5m footway width in front of the West block following the existing kerb line.
- 4.3.6 The loading bay would be accommodated within the contra flow cycling arrangement as there is not a mandatory or advisory cycle lane on the carriageway. It would maintain a minimum 3m effective carriageway width which is consistent to the BANES / WSP layby arrangement on the north side of UBW opposite the East block. The road is straight and forward visibility is good for contra flow cyclists passing any stopped vehicle. This is a quiet road, where cyclists travelling in both directions will mix with pedestrians and the low level of traffic, all at slow speeds.

Option 3

- 4.3.7 This includes a loading bay partly within the footway and partly within the carriageway between the hotel entrance and Parsonage Lane. This bay is 14m long and 2.7m wide. It would retain a minimum 2m footway width in front of the West block.
- 4.3.8 An effective carriageway width of 3m would be retained past an HGV parked in the loading bay, which is consistent to the BANES / WSP layby arrangement on the north side of UBW opposite the East block. The carriageway alignment and bay would help with forward visibility and direct contra flow cyclists past any stopped vehicle. This is a quiet road, where cyclists travelling in both directions will mix with pedestrians and the low level of traffic, all at slow speeds.

Option 4

- 4.3.9 This includes a loading bay partly within the footway and partly within the carriageway to the west of the building entrance. This bay is 29m long and 2.7m wide. It would retain a minimum 2m footway width in front of the West block. A disabled bay is shown between the building entrance and Parsonage Lane.
- 4.3.10 An effective carriageway width of 3m would be retained past an HGV parked in the loading bay, which is consistent to the BANES / WSP layby arrangement on the north side of UBW opposite the East block. The carriageway alignment and bay would help with forward visibility and direct contra flow cyclists past any stopped vehicle. This is a quiet road, where cyclists travelling in both directions will mix with pedestrians and the low level of traffic, all at slow speeds.

Preferred Options













- 4.3.11 Options 2 and 4 are considered to be the preferred options as they would provide a sufficient sized loading bay for the proposed hotel and other local businesses and traders, maintaining a carriageway width for vehicles and contra flow cycling consistent with the BANES/WSP arrangement on the north side of UBW, without narrowing the footway. Both options provide a disabled parking, but by separating the loading and disabled bay in Option 4 would create more space in front of the building entrance for pedestrians entering and leaving the proposed hotel.

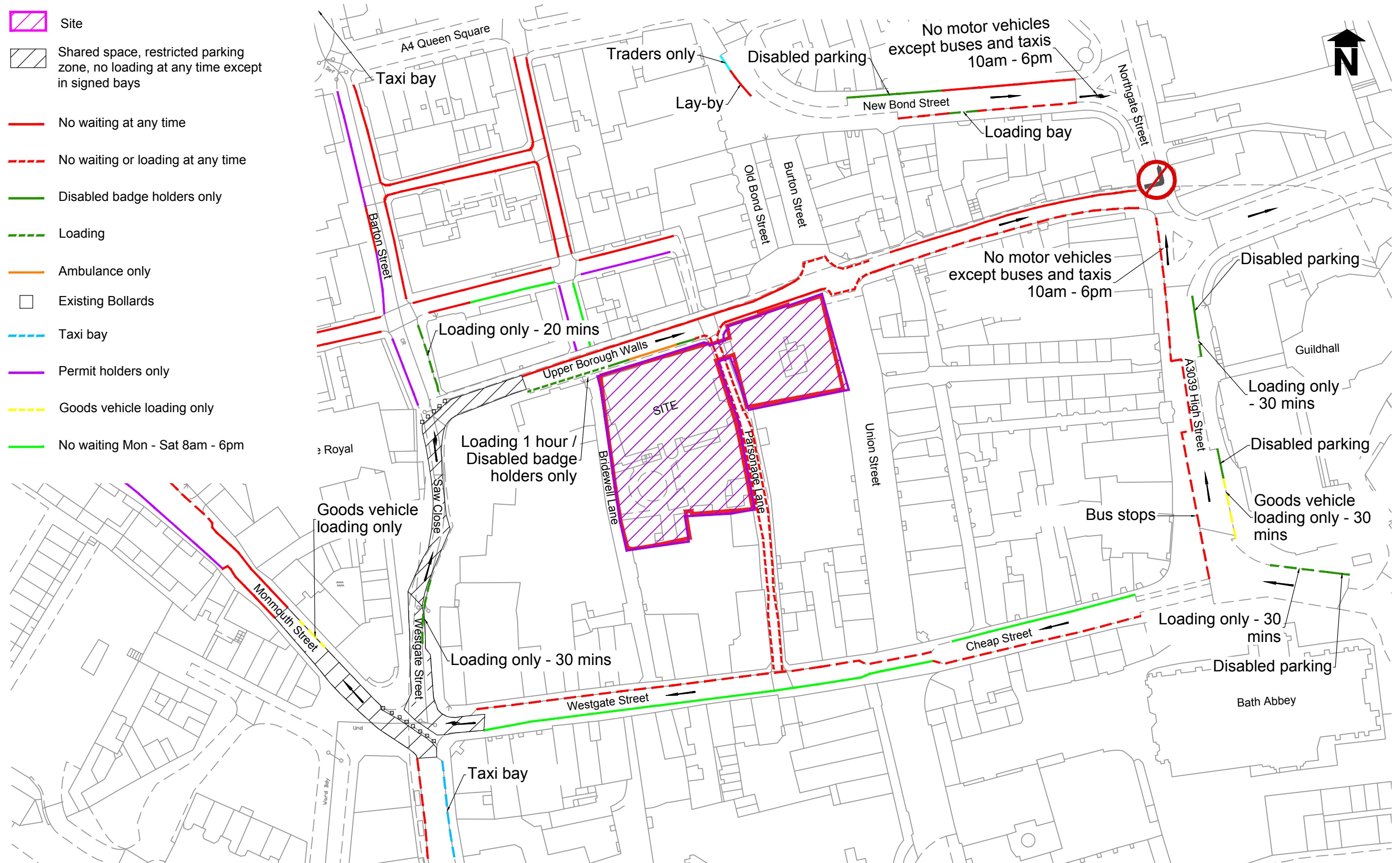
5.0 CONCLUSIONS

- 5.1.1 Planning permission for the hotel was granted with planning obligations requiring commuted sum payments towards a TRO process and also a public realm contribution that is specifically relating to improvements to UBW.
- 5.1.2 Whilst the city centre security scheme has removed the dedicated loading bay from UBW adjacent to the site, short term loading is still permitted. However, the TRO and Public Realm s.106 funding could still be used to install the required loading bays which are essential for the operation of the permitted hotel.
- 5.1.3 The CRSTS Phase 1 scheme bans all loading from UBW, except at one loading bay, which itself is not guaranteed due to structural issues with sub station underground.
- 5.1.4 There will be significant pressure on this one loading bay as all servicing and deliveries for the hotel and surrounding retail/ hospitality/ other businesses have to occur during an extremely short period of time, when UBW is not closed to traffic as part of city centre security scheme.
- 5.1.5 The CRSTS Phase 1 scheme should take account the permitted development scheme at the former Mineral Hospital and the servicing arrangements agreed with BANES.
- 5.1.6 A single loading bay on UBW is not sufficient for current or future needs of local businesses. The hotel cannot be expected to use the loading bays on Barton Street, some 90m from the site, or on Westgate Street some 225m from the site, due to the need to regularly drop off or collect large items or pick up waste and recycling. The lack of loading bays will lead to congestion and cause highway safety issues.
- 5.1.7 Additional loading bays are therefore necessary on UBW. PEP/Fragrance have identified options for this at Attachment 3. We respectfully request that the Council continue to work with Fragrance's Design Team to address the critical servicing requirements before the TRO proposals are finalised for formal consultation.

ATTACHMENT 1

2021 Parking and Loading Bays and Restrictions

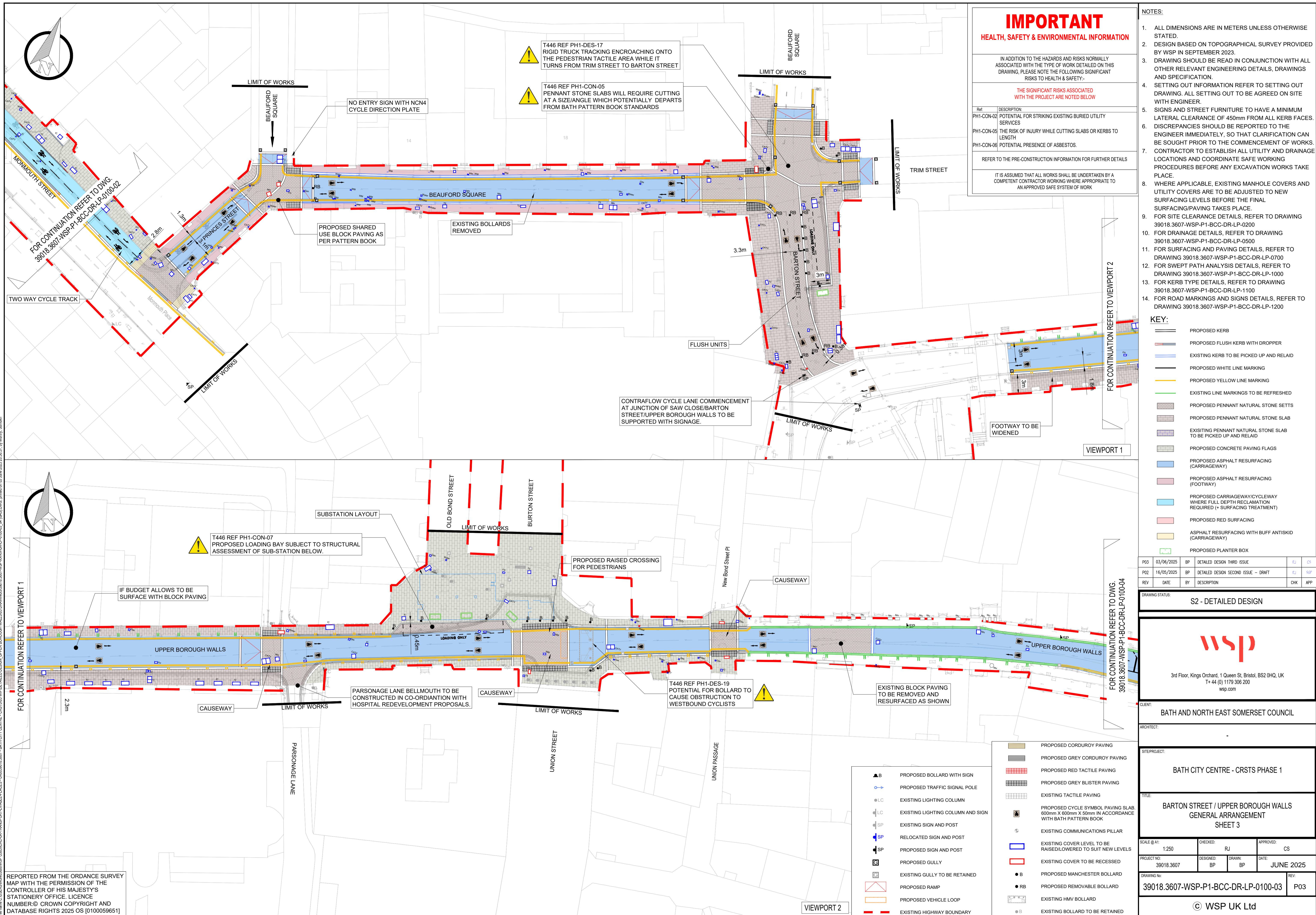
-  Site
-  Shared space, restricted parking zone, no loading at any time except in signed bays
-  No waiting at any time
-  No waiting or loading at any time
-  Disabled badge holders only
-  Loading
-  Ambulance only
-  Existing Bollards
-  Taxi bay
-  Permit holders only
-  Goods vehicle loading only
-  No waiting Mon - Sat 8am - 6pm



NOTE: REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HMSO. © CROWN COPYRIGHT LICENCE NO. 10009597

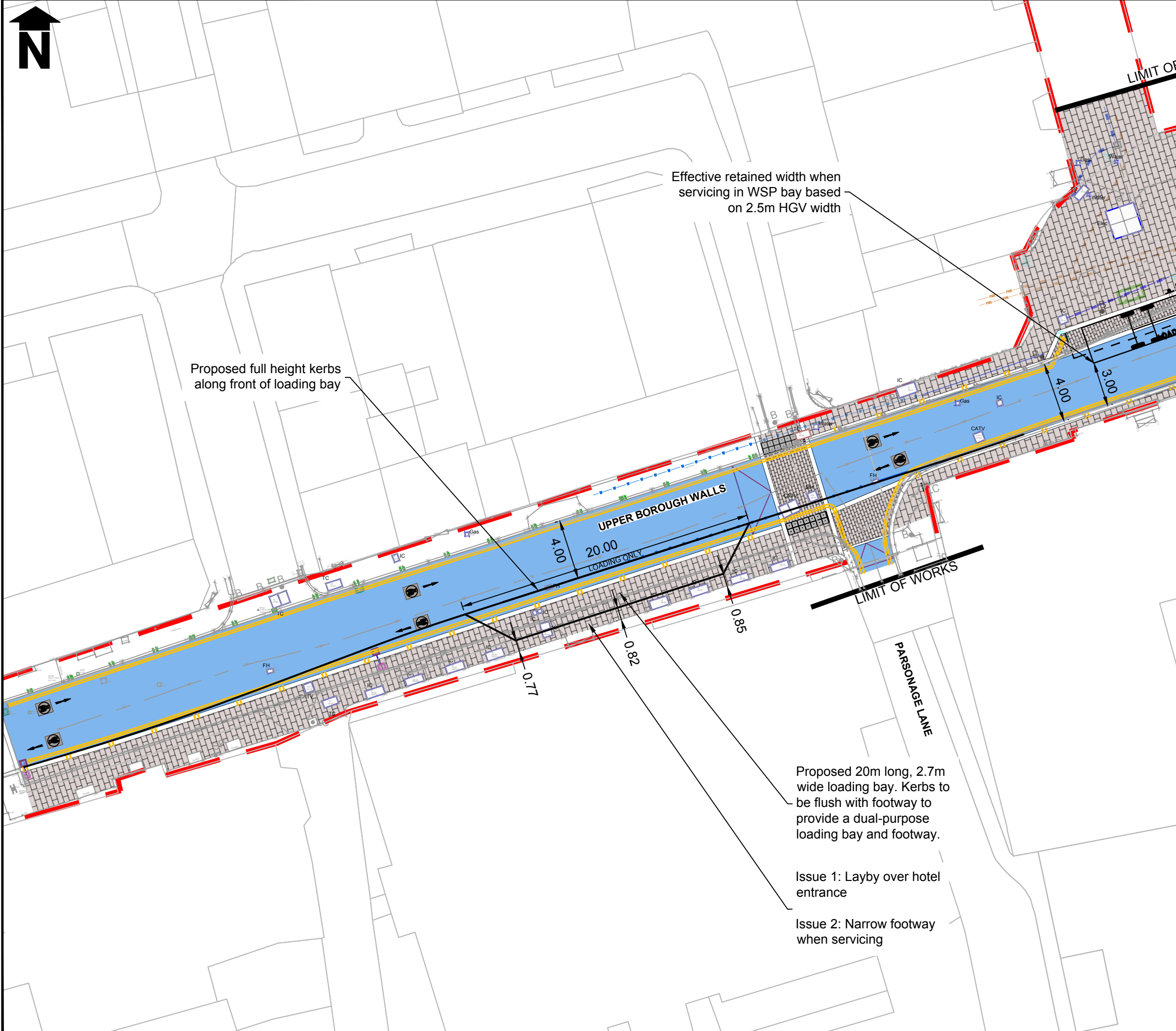
ATTACHMENT 2

WSP CRSTS Phase 1 Drawing



ATTACHMENT 3

PEP Option Drawings



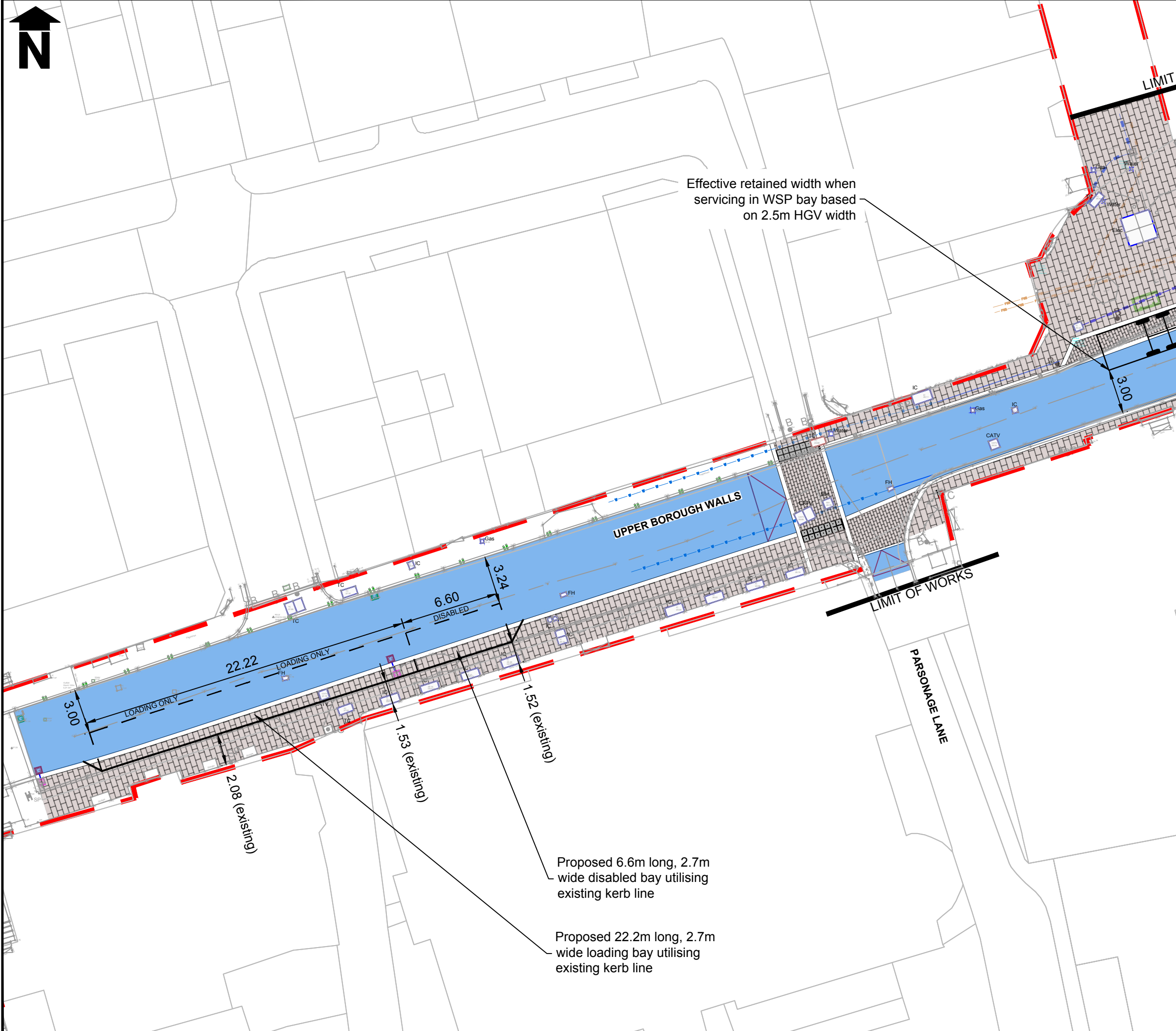
Peter Evans Partnership
Transport Planning & Highway Consultants
Client
FRAGRANCE UK BATH LTD

Job
BATH, MINERAL HOSPITAL

Drawing Title
LOADING BAY OPTION 1 ON FOOTWAY

Scale @ A3 1:250	Date 10.01.25	Drawn by JS	Checked by MEC
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Drawing Number 3174.03	Issue Status FOR REVIEW
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Effective retained width when servicing in WSP bay based on 2.5m HGV width

UPPER BOROUGH WALLS

LIMIT OF WORKS

PARSONAGE LANE

A 12.11.25 JS Loading bay extended



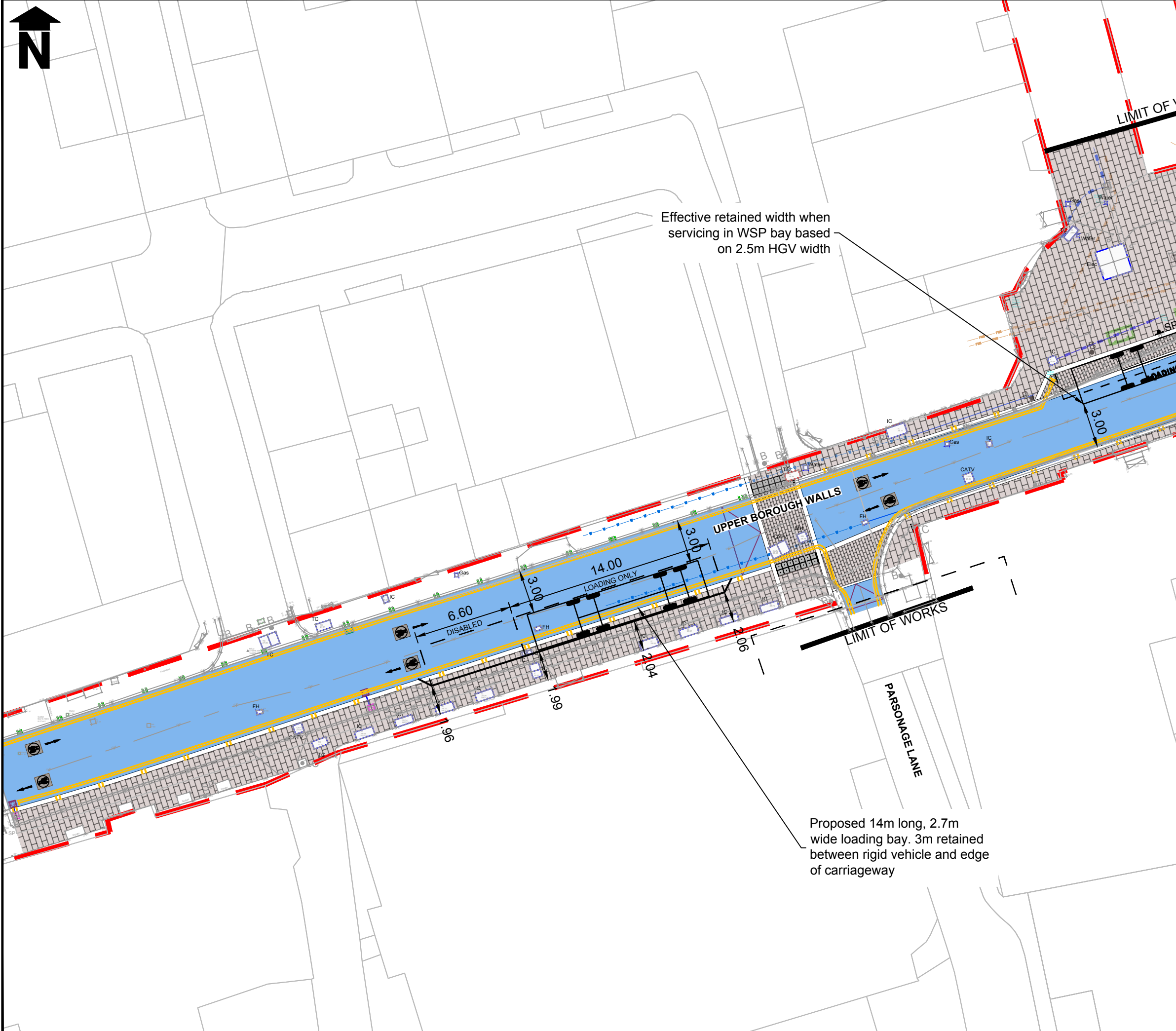
Peter Evans Partnership
Transport Planning & Highway Consultants
Client
FRAGRANCE UK BATH LTD

Job
BATH, MINERAL HOSPITAL

Drawing Title
LOADING BAY OPTION 2

Scale @ A3 1:250	Date 10.11.25	Drawn by JS	Checked by MEC
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Drawing Number 3174.04A	Issue Status FOR REVIEW
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pep

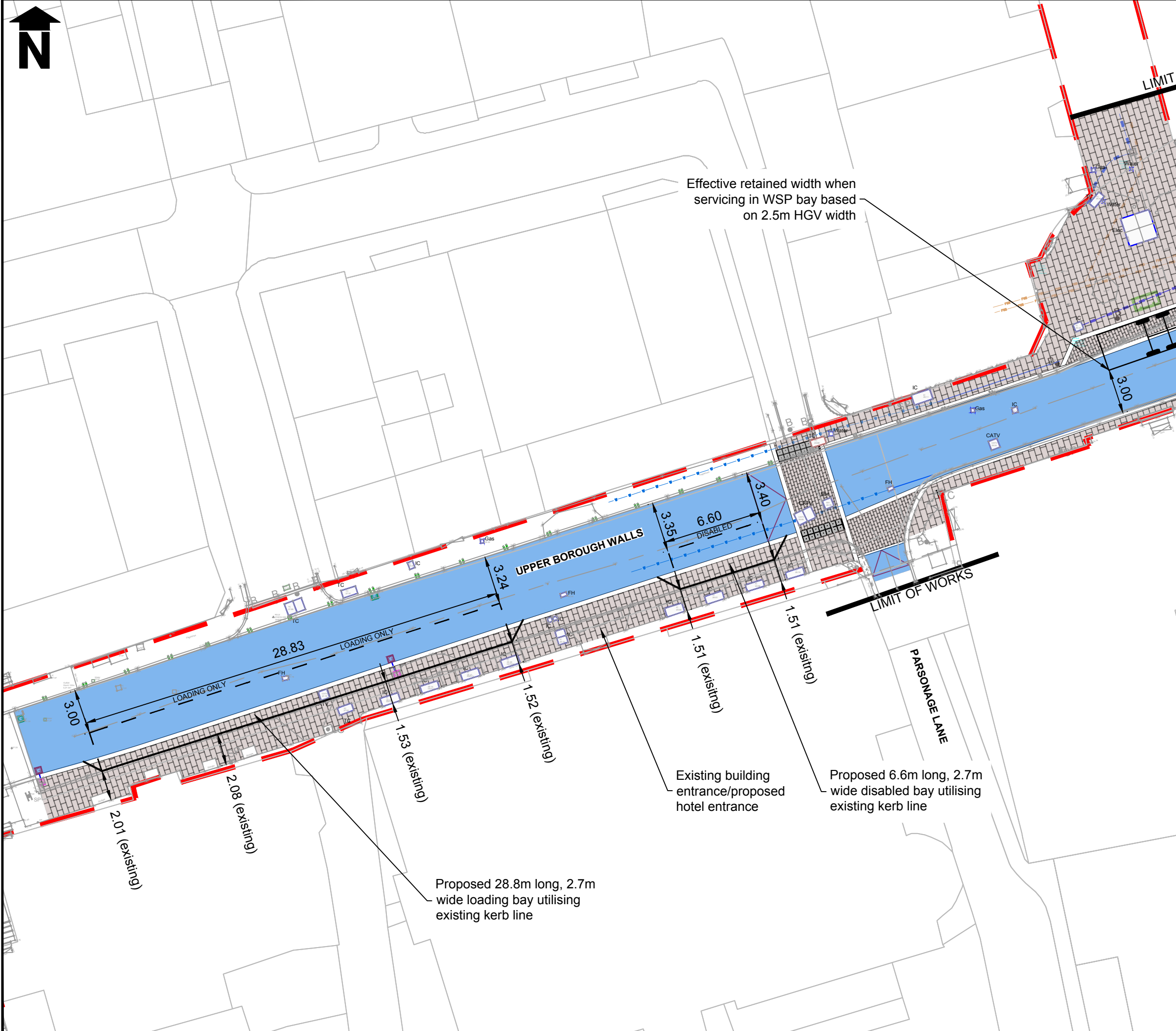
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Drawing Title
LOADING BAY OPTION 3

Scale @ A3	Date	Drawn by	Checked by
1:250	10.01.25	JS	MEC

Drawing Number	Issue Status
3174.05	FOR REVIEW



Effective retained width when servicing in WSP bay based on 2.5m HGV width

Proposed 28.8m long, 2.7m wide loading bay utilising existing kerb line

Existing building entrance/proposed hotel entrance

Proposed 6.6m long, 2.7m wide disabled bay utilising existing kerb line

pep

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Transport Planning & Highway Consultants

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Drawing Title
LOADING BAY OPTION 4

Scale @ A3 1:250	Date 12.11.25	Drawn by JS	Checked by MEC
Drawing Number 3174.04	Issue Status FOR REVIEW		