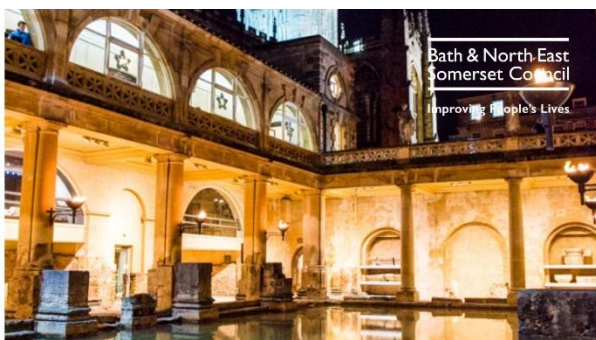


Traffic Regulation Order consultation on Parking Charges, 2026-27

Consultation Outcome Report



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Revision	Description	Issued by	Date
1.0	Draft	AD	08/04/2026
1.0	Final	PG	24/07/2026
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Executive Summary

- a) Proposals have been developed in accordance with the requirements of section 122 of the Road Traffic Regulation Act (1984). Their aim is to support traffic management, pedestrian safety, sustainable travel, efficient use of limited kerb space, and the financial sustainability of parking services. They sit alongside wider council priorities including safer streets, improved travel choices, cleaner neighbourhoods, Liveable Neighbourhoods, Journey to Net Zero and the Movement Strategy for Bath.
- b) Vehicle sizes are increasing, driven by consumer demand for larger models like SUVs, which made up over 60% of new UK car sales in 2024—up from less than 50% in 2020. Research shows that bigger vehicles such as SUVs and vans are more likely to cause serious injuries or fatalities to pedestrians (especially children) and cyclists because of their height and blind spots. Major cities risk losing up to 14% of on street kerb space over the next 14 years if car size keeps rising at current rates. Large vehicles also block buses, emergency services, and deliveries on narrow roads, making travel more difficult for everyone.
- c) The consultation was held for 21 days between 28 May 2026 and 18 June 2026. A proactive approach was taken with direct contact to over 10,500 stakeholders to ensure strong levels of engagement.
- d) The consultation generated 920 individual responses within the consultation period. Of these, 909 were submitted through the online feedback form and 11 were submitted through other channels. A total of 2,308 separate free text comments were received and analysed using Generative AI to identify the main themes raised by respondents.
- e) Respondents were asked for equality monitoring information relating to age and disability, and postcode information was used to understand the broad geographical distribution of responses. 84% of online questionnaire responses, representing 765 responses, were identified as coming from people living within Bath and North East Somerset. Consultation page analytics showed 11,841 page views from 1,672 individual users, with 55% of unique viewers going on to submit a response.
- f) Views on the proposal to introduce an additional size-based charge or discount for resident parking permits were finely balanced. 47% of respondents supported the proposal and 49% did not support it.

The main issues raised included fairness, affordability, impacts on families, disabled people, carers and tradespeople, parking space availability, measurement method, interaction with emissions-based charges,

enforcement, administration and whether the proposal would generate behavioural change.

- g) Having considered the feedback, the council recognises the concerns raised about affordability, practical vehicle needs and implementation. However, the proposal continues to support the efficient use of limited kerb space, safer movement of pedestrians and cyclists, and improved access for public transport, emergency services, waste collection and deliveries. It is therefore considered appropriate to progress the proposal, subject to the amendment that the vehicle data source used to calculate size is clearly declared within the On Street Parking Permit Terms and Conditions.
- h) The proposal to increase visitor parking permit charges was not supported by a majority of respondents. 31% supported the proposal, 59% did not support it and 11% expressed no opinion.

Key concerns included the pace and scale of the increase, affordability, impacts on carers, family visits and vulnerable residents, permit flexibility, misuse, enforcement and transparency on how income is used.

- i) The council recognises that visitor permits are important for residents and that any increase in parking charges comes at a sensitive time. However, visitor permit charges have historically remained low and the proposed phased increase is intended to support the ongoing administration, maintenance and enforcement of Resident Parking Schemes so that these schemes remain financially sustainable. It is therefore recommended that the proposal is progressed as advertised, with continued work to improve customer information, reporting transparency and system functionality.
- j) Views on increasing the all-day Park and Ride parking charge for motorists who do not use the bus service were closely divided. 41% supported the proposal, 38% opposed it and 21% expressed no opinion.

Respondents raised concerns about affordability, enforcement, displacement, active travel users and the role of Park and Ride sites in supporting walking, cycling and car sharing. Respondents also recognised the importance of protecting capacity for those using the Park and Ride bus service.

- k) The council recognises that Park and Ride sites can support a range of travel behaviours. However, their primary purpose is to support the Park and Ride bus service, help reduce vehicle trips into the city centre and preserve parking capacity for bus passengers. The existing short-stay charge remains unchanged and bus users will continue to park free of charge. Having considered the feedback, the proposed increase to the all-day charge for motorists not using the bus service is considered proportionate and consistent

with the intended purpose of the Park and Ride network.

- l) The proposal to introduce parking charges on Weston Road, Bath generated mixed feedback. 24% of respondents supported the proposal, 33% opposed it and 43% expressed no opinion.

Respondents valued the existing free parking, particularly for short visits to Royal Victoria Park and the city centre, and raised concerns about displacement into nearby residential streets, affordability, hospital staff and visitors, local businesses, evidence and enforcement.

- m) The proposal retains up to one hour of free parking and is intended to encourage turnover in a currently unrestricted location close to the city centre and Royal Victoria Park. The council recognises concerns about displacement and local access, but considers that the proposal is a proportionate way to manage kerb space, discourage long-stay commuter parking and align the location with existing emissions-based charging principles.
- n) The proposal affecting Monmouth Street and Monmouth Place was also mixed. 24% supported the proposal, 29% opposed it and 47% expressed no opinion.

Respondents raised issues about the loss of resident parking, loss of short-stay visitor parking, business access, loading, police operational need, accessibility and enforcement.

- o) The proposal is intended to support the opening and operation of the new Avon and Somerset Police operational base on Monmouth Street by providing dedicated spaces for marked police vehicles. The loss of permit-holder parking on Monmouth Street is mitigated by converting an equivalent length of dual-use parking on Monmouth Place to permit-holder parking only. On balance, the proposal is considered proportionate and should be progressed.
- p) The additional car park operational amendments were supported by 27% of respondents, opposed by 28%, with 45% expressing no opinion. These amendments relate to changing daytime charging hours at Bath Sports and Leisure Centre car park, removing the Holburne Museum from the TRO because it is not council controlled, removing the 4-hour overnight maximum stay for electric vehicles while charging at Larkhall Square Car Park, and clarifying that valid digital authorisation does not require the display of a physical ticket.
- q) Having considered the feedback, these operational amendments are considered limited, practical and appropriate. They improve clarity, reflect current operational control, support overnight electric vehicle charging for residents without off-street parking, and provide a clearer charging structure

for early-morning leisure centre users. It is therefore recommended that these proposals are progressed as advertised.

- r) An Equality Impact Assessment has been completed in conjunction with the proposals. The consultation feedback has been considered alongside the EqlA process and no changes are considered necessary following review of the consultation responses.

Recommendation

- s) After consideration of the feedback received during the public consultation, it is recommended that all proposals set out in the Traffic Regulation Order consultation are implemented as set out.

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1 Introduction

1.1 Background

1.1.1 The proposals included within this consultation will affect everyone living within, or visiting, Bath and North East Somerset, and therefore their aims are aligned to the council's Corporate Strategy. Within this framework, the proposals strongly align to the following priorities:

- More travel choices
- Clean, safe and vibrant neighbourhoods
- Healthy lives and places
- Cultural life

1.1.2 In 2022 the council implemented an emissions-based pricing policy for resident parking permits. In September 2023, emission-based car parking charges were introduced across all council managed car parks in Bath across all payment channels, a national first, followed by all paid for parking locations in November 2024.

1.1.3 Emissions-based charges were developed to improve air quality through a major shift to sustainable transport, walking and cycling and incentives to reduce the use of more polluting vehicles to secure the safer movement of pedestrian traffic on the highway by reducing the public health risks posed to them by air pollution. This approach also aimed to facilitate the achievement of strategic outcomes of local transport policy by influencing behaviour change and reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods and align with the Council policy on Liveable Neighbourhoods and the climate and nature emergency.

1.1.4 As noted in the National Air Quality Strategy, measures designed to address air quality issues will often have a positive effect on climate change. Whilst emissions-based charges were not justified on climate change grounds; it was anticipated that measures which are designed to (1) improve air quality in order to secure the safer movement of pedestrian traffic on the highway, and (2) meet traffic management purposes, will also reduce the level of emissions that drive climate change, as a result, for example, of encouraging a switch to low emission vehicles.

1.1.5 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) 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.

- 1.1.6 This report aligns to the Parking Strategy to ensure that parking charges in Bath and North East Somerset should be periodically reviewed and adjusted as required to ensure that they achieve the aims of the Council's strategies.
- 1.1.7 Pedestrian safety; managing traffic flows; and availability of parking are all significant issues in our region. Whilst the proposals detailed in this report are a separate standalone scheme, they are complimentary to other projects aimed at addressing these issues, including but not limited to the following:
- Promoting a major shift to mass transport, walking and cycling, with incentives to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy
 - Improving the safety of cyclists and pedestrians through active travel schemes which rebalance priorities on our roads and build on social distancing needs.
 - A Clean Air Zone in central Bath, to encourage less polluting ways of travelling around the city, which has successfully reduced harmful Nitrogen Dioxide levels at monitoring locations across the city to below the limit of 40 µg/m³ for the second consecutive year, with ongoing reductions in the number of non-compliant vehicles entering the city.
 - Liveable Neighbourhoods policy and work concerning reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods.
 - Emission-based car parking charges.

1.2 The Issue – Keeping our roads safe and clear

- 1.2.1 Vehicle sizes have been growing significantly due to factors like consumer demand for larger models, such as SUVs, and a trend of increasing dimensions in many popular cars. SUVs became the most popular car type in the UK in 2024, accounting for over 60% of all new car sales, a significant increase from less than 50% in 2020. <https://cleancitiescampaign.org/rise-of-carspreading-uk/>.
- 1.2.2 Studies suggest that larger and taller vehicles like SUVs and vans are more likely to cause increased injuries or fatalities in a collision with a pedestrian, especially children, or cyclists due to factors which include bonnet height and increased blind spots. <https://injuryprevention.bmj.com/content/early/2025/04/11/ip-2024-045613>
- 1.2.3 Larger vehicles can also obstruct buses, emergency services, and deliveries in our narrow roads, making it harder for all of us to get around.

- 1.2.4 We also propose to only issue parking permits to vehicles with a valid MOT certificate at the time of permit issue, to help protect people from unsafe and potentially uninsured vehicles.

1.3 Covering operational costs and promoting fairness and sustainable travel

- 1.3.1 Running and enforcing our parking services costs money. These services must cover their costs if they are to remain reliable and effective. We are therefore proposing a modest price increase on RPZ visitor parking permit
- 1.3.2 We are also modestly adjusting charges for those who choose to park for longer periods at our P&R sites all day without using the bus. This frees up limited space for bus users, particularly at peak times.
- 1.3.3 We want a parking system that is fair and encourages safer, cleaner and healthier travel choices. These proposals build on Bath's Clean Air Zone, support our Journey to Net Zero and proposed Movement Strategy, and contribute to Vision Zero - our pledge to eliminate deaths and serious injuries on our roads.

1.4 Purpose of the consultation

- 1.4.1 The purpose of this public consultation was to seek feedback as part of the statutory process to vary our Traffic Regulation Orders (TRO) on a range of parking charge proposals that aim to improve road safety, encourage sustainable travel, and ensure our parking services cover their costs.
- 1.4.2 This follows a preliminary public consultation on the same core measures in the Autumn of 2025, following which the responsible Cabinet member took the decision to progress to a further statutory public consultation via a formal TRO. Some additional proposals were also included as part of this TRO consultation.

1.5 The proposals for consultation

- 1.5.1 An outline of the proposals as included within the public consultation is set out in this section. More details on any charges and what a customer might be required to pay for all proposals included within this report, are available within Appendix A.
- 1.5.2 The baseline charge refers to the charge applied to the least polluting vehicles for paid for parking.

1.5.3 Size based resident permit charges

- 1.5.4 We are proposing that the cost of a residents' parking permit is based on the size of the vehicle, with supplementary charges for some larger vehicles and discounts for smaller vehicles.
- 1.5.5 To support public health and the safety of pedestrians, we already link the cost of parking permits to a vehicle's emissions. By also linking permit costs to the size of a vehicle, we encourage ownership of smaller vehicles that reduce risks for pedestrians and cyclists.
- 1.5.6 Vehicles are getting larger every year which is concerning when we know that they are more likely to seriously injure or kill pedestrians and cyclists in a collision than smaller vehicles. They also take up more space on increasingly congested streets, blocking access for emergency vehicles and buses, and making it harder for everyone to get around.
- 1.5.7 Introducing supplementary charges for larger vehicles and including discounts for smaller ones will encourage the uptake of safer, smaller and cleaner vehicles and allow more vehicles to park in our busy residential streets.
- 1.5.8 Size-based charges are proposed to be based on a vehicle's area in square metres (length x width). This is a similar approach to our emissions-based charges, with some larger vehicles paying more. A discount on the first permit is available for the smallest vehicles, encouraging residents to own smaller cars.
- 1.5.9 Vehicle metric data is to be provided by a source to be prescribed in our on-street parking permit terms and conditions. Vehicle width will be based on the data set at the time of application and will include fully extended wing mirrors. Since manufacturer information may vary, this method prevents overcharging and treats all vehicles fairly, whether or not their mirrors retract automatically.
- 1.5.10 Our digital permit provider (currently MiPermit) would automatically calculate any supplementary charge or discount, ensuring that prospective permit holders receive a personalised charge.
- 1.5.11 Where data on size is not held on a specific vehicle, we would also accept photographic or documentary evidence that clearly shows the vehicle's dimensions. If no evidence exists, we will apply the maximum charge.
- 1.5.12 Vehicles are grouped into bands based on their size (area in metres squared). The permit charge or discount applied will depend on the vehicle's band and whether it is a first or second permit.

1.5.13 Size-based charges are capped at a maximum which is equivalent to a vehicle that is 14.01m².

1.5.14 Charges for a second permit are higher than for a first permit and no discount is offered for second permits. This reflects the added pressure that multiple-vehicle households place on limited road space.

1.5.15 People with a blue badge living in a resident parking zone are entitled to a permit free of charge and therefore are not impacted by these proposals.

1.5.16 Visitor parking permits

1.5.17 Visitor permits can be purchased in advance by resident living in eligible properties. They are sold in bundles of 100 hours (digital permits) or 10 days/20 half days (paper permits) with a day being equivalent to 10 hours.

1.5.18 Currently permits cost the equivalent of £1 per day. This will increase by 50 pence each year, for three years. By 2028 the equivalent cost per day would be £2.50. Already purchased visitor permits remain valid for 12 months from the day of purchase and are not impacted by any price change.

1.5.19 The increase will help to cover the administration and enforcement costs of RPZs so that they are funded by the permit holders who benefit, and not by those living outside the zone.

1.5.20 Car parking charges – Bath Park and Ride

1.5.21 We're proposing to increase the 'up to 24-hour' parking charge at our P&R sites from £3 to £4 for motorists who do not use the bus service. This change would take effect from October 2026.

1.5.22 We want to discourage long-stay parking by those who do not use the bus service to free up limited space for those who do, particularly at peak times. This will ensure our P&R services are effective in encouraging sustainable travel.

1.5.23 Weston Road, Bath

1.5.24 We are proposing to introduce parking charges on a section of Weston Road, Bath, which is currently unrestricted kerb space. The proposed area is between the junction with Park Lane and the northeast entrance into Royal Victoria Park.

1.5.25 The charges are proposed to repeat the emissions-based charges for parking within the adjacent Royal Victoria Park, providing up to 1 hour of free parking.

1.5.26 Monmouth Street and Monmouth Place, Bath

1.5.27 We are proposing to change a single 25m length of parking bay on Monmouth Street from Central zone permit holders only to dedicated parking for marked Police vehicles only, with some bays on Monmouth Place from dual use for permit and paid for parking to Central zone permit holders use only.

1.5.28 This will support the opening of a new Police Station in central Bath for Avon and Somerset Police and will help improve visibility and rapid deployment of Police Officers to support public safety.

1.5.29 Car park operational amendments

1.5.30 We are proposing the follow amendments to the operations of our existing car parks:

a) **Updating the operational hours of the daytime charges at the Sports and Leisure Centre car park in Bath to 6am to 8pm (currently 8am to 8pm).**

Adjusting the start time of daytime charges at Bath Sports and Leisure Centre to 6am, instead of 8am, will provide equitable access for users participating in activities beginning between 6:30am and 8am. This change ensures that these individuals are no longer required to purchase an overnight stay for events with only a brief overlap.

b) **Removing the Holburne Museum as a location from the TRO, as it is not a council-run car park.**

The removal of the Holburne Museum from the TRO is required because the council no longer maintains operational control over this privately owned location.

c) **Removing the 4-hour maximum stay between 8pm and 8am (overnight) for an electric vehicle whilst charging at Larkhall Square Car Park, Bath.**

Removal of the maximum 4-hour limit for overnight charging of electric vehicles at Larkhall Square car park allows the local community to utilise these facilities outside regular hours. This therefore supports the transition to electric vehicles in areas with limited off-street parking provision and aligns with the use of EV bays at our other car parks.

d) **Clarifying that a digital authorisation within a council car park does not require the display of a physical ticket.**

The proposed digital authorisation change is a technical amendment to provide improved clarity within the order.

2 Public Consultation

- 2.1.1 A public consultation was held to advertise the proposals and facilitate public feedback over a 21-day period between 28 May 2026 and 18 June 2026 and publicised digitally via the Council's website; press release; and direct email contact to key stakeholders.
- 2.1.2 The council took a proactive approach to engagement and issued direct communications (where contact details were available) to many groups including:
 - a) 10,507 emails and 28 SMS messages sent to customers that had an active permit account or had recently used the MiPermit service to pay for parking at locations impacted by the proposals.
 - b) A Service header, or banner, placed across relevant Council and MiPermit service pages, informing and directing page visitors to the consultation.
- 2.1.3 A dedicated web page was created on the council's website to provide accessible information to potential respondents on the proposals.
- 2.1.4 The website set out in detail the proposed charges and included a range of common vehicles across different charge bands (identified from real world permit data) so that people could see indicative charges. This example charges are included in Appendix B.
- 2.1.5 A dedicated mailbox was made available for stakeholders to use where they required clarification on any element of the proposals.
- 2.1.6 The council is legally required to pay 'due regard' to people with protected characteristics as defined under the Equality Act (2010) and the Public Sector Equality Act (2023). Equality impact assessments were undertaken prior to public consultation, and these were published within the online documentation.
- 2.1.7 A web-based questionnaire was developed to seek the views from all stakeholders on the proposals. This feedback form was designed to ensure the questions remained neutral so that responses reflect respondents own views.
- 2.1.8 Due to a range of proposals being included within the public consultation the feedback form was separated into specific questions designed to help respondents provide exact feedback for each proposal as well as any additional information they felt was appropriate.

- 2.1.9 Respondents were encouraged to provide their feedback via the online feedback form; however, the council welcomed and accepted feedback on the proposals across a range of channels including email; telephone; or in writing both directly and through our Council one stop shops to ensure that no member of the community was digitally excluded from providing us with their views.
- 2.1.10 The feedback form was designed to collect both quantitative and qualitative data. Quantitative data was gathered through single answer questions producing numerical results. Qualitative data was gathered through additional comments to support the respondent's choice or add additional comment.
- 2.1.11 In direct regards to the proposals included within the consultation, respondents were asked:
- a) To what extent do you support or oppose our proposals to introduce an additional size based charge or discount for residents permits?
 - b) To what extent do you support or oppose our proposals to increase the charge for visitor parking permits?
 - c) To what extent do you support or oppose our proposals to parking charges on Weston Road, Bath?
 - d) To what extent do you support or oppose our proposals to remove some permit parking bays on Monmouth Street, and to change dual use permit/paid for parking spaces on Monmouth Place to permit spaces only?
 - e) To what extent do you support or oppose our proposals to increase the charge for all day parking at our park and ride sites for motorists that do not use the park and ride bus service?
 - f) To what extent do you support or oppose our additional proposals concerning car parks at Bath Sports and Leisure Centre, Larkhall Square and the Holburne Museum?
- 2.1.12 Respondents were asked for their age (within defined ranges) and if they considered themselves to be disabled or have a blue badge. The purpose of this was to determine if there was any variability, and therefore potential impact, across these different groups.
- 2.1.13 Respondents were asked to provide their postcode to allow identification of Bath & North East Somerset residents and those that travel to the Local Authority area.
- 2.1.14 Respondents were made aware that Generative Artificial Intelligence (AI) analysis tools were to be used to aid the analysis of data and to ensure personal information was not included. This analysis has been undertaken in accordance with the council's policy for the use of AI.

3 Consultation Response

3.1 Feedback

- 3.1.1 The public consultation generated a total of 920 individual responses within the consultation period. 909 responses were submitted via the online feedback form, a further 11 being submitted through another channel.
- 3.1.2 On 28 May the council received correspondence raising concerns that information published within the consultation material inside a table header relating to illustrative examples of how the size-based proposal may impact the cost of permits was misleading or false. Whilst this concern was noted it was not upheld. Multiple references within the material, including a banner statement prominently located within the proposal section, contained explanatory text clarifying how the proposed charging structure would operate, including that the size-based element sits alongside the existing emissions-based permit charges.

3.2 Equalities monitoring

- 3.2.1 Respondents were asked to provide equalities information relating to the protected characteristics of age and disability. These results are provided in Figure 1 and Figure 2
- 3.2.2 Figure 1 shows how the distribution of respondents age compares with the 2024 Mid-Year ONS data (the most recent published data set at the time of this report) for Bath & North East Somerset.

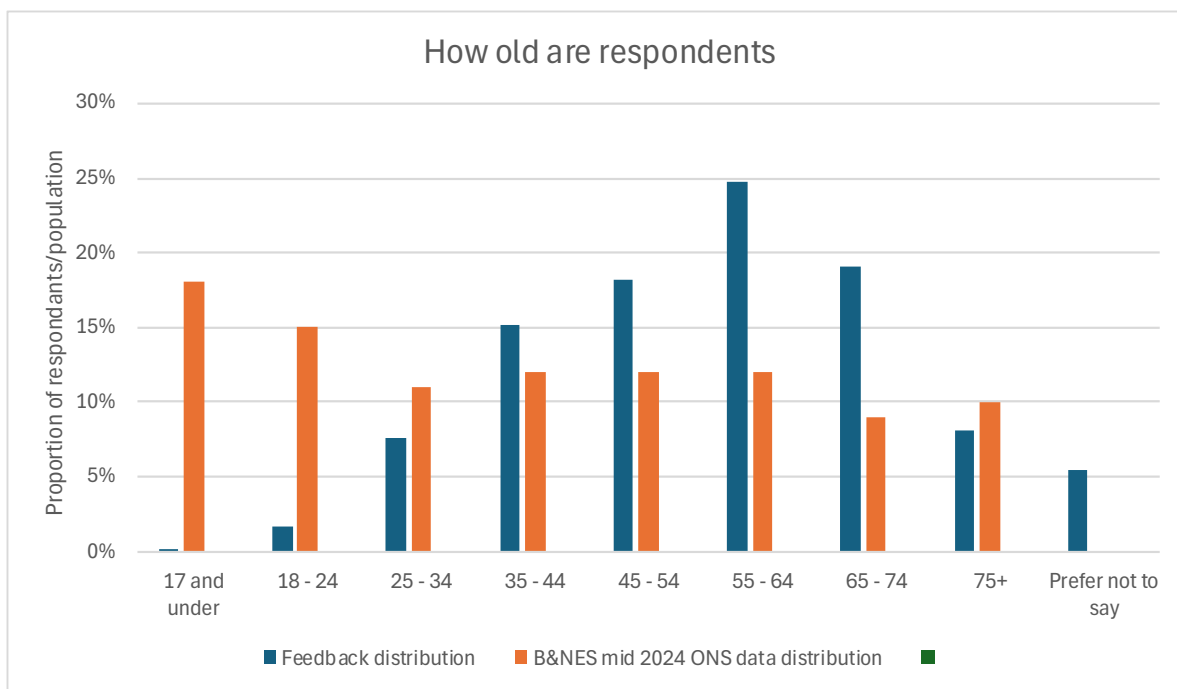


Figure 1 – Respondant age distribution compared to 2024 mid year ONS data for Bath & North East Somerset

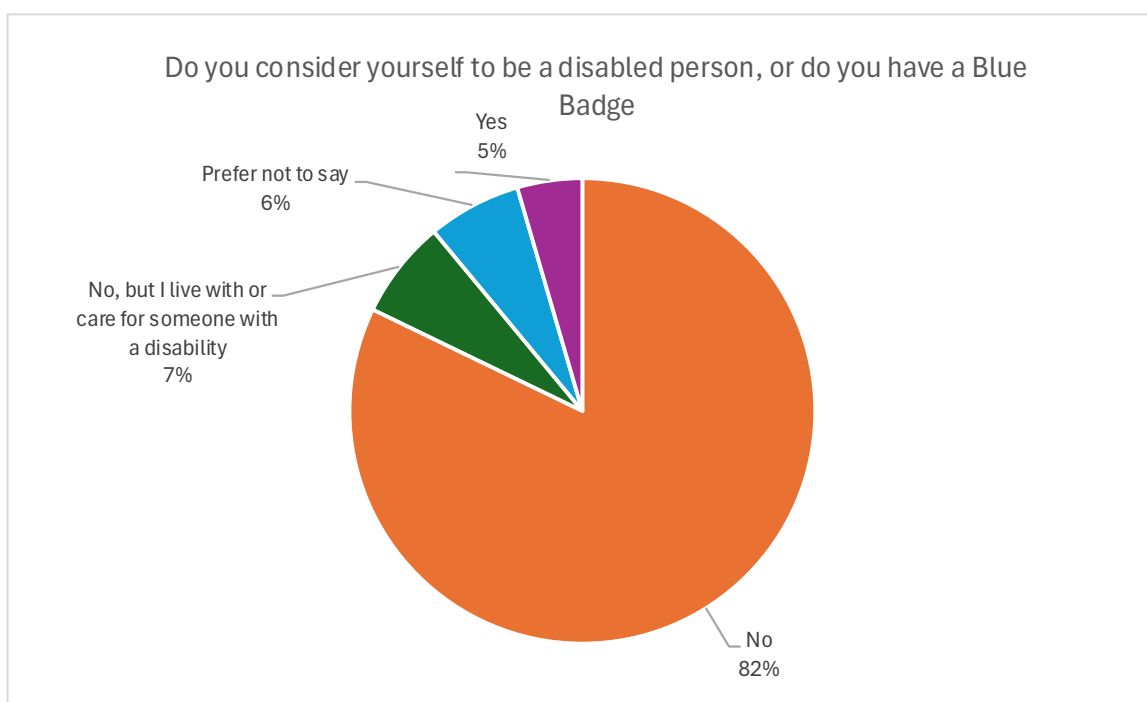


Figure 2 – Respondents declared disability status

3.3 Respondent distribution

3.3.1 84% of the responses (765 in total) to the online questionnaire were from individuals that could be identified as living within the Bath & North East Somerset area. The remaining 16% (144 responses) could not be geographically located. A full breakdown of this distribution is included within Appendix C.

3.3.2 Figure 3 shows the distribution of the 84% of responses (765) where their location could be broadly identified, including at the ward level within Bath & North East Somerset.

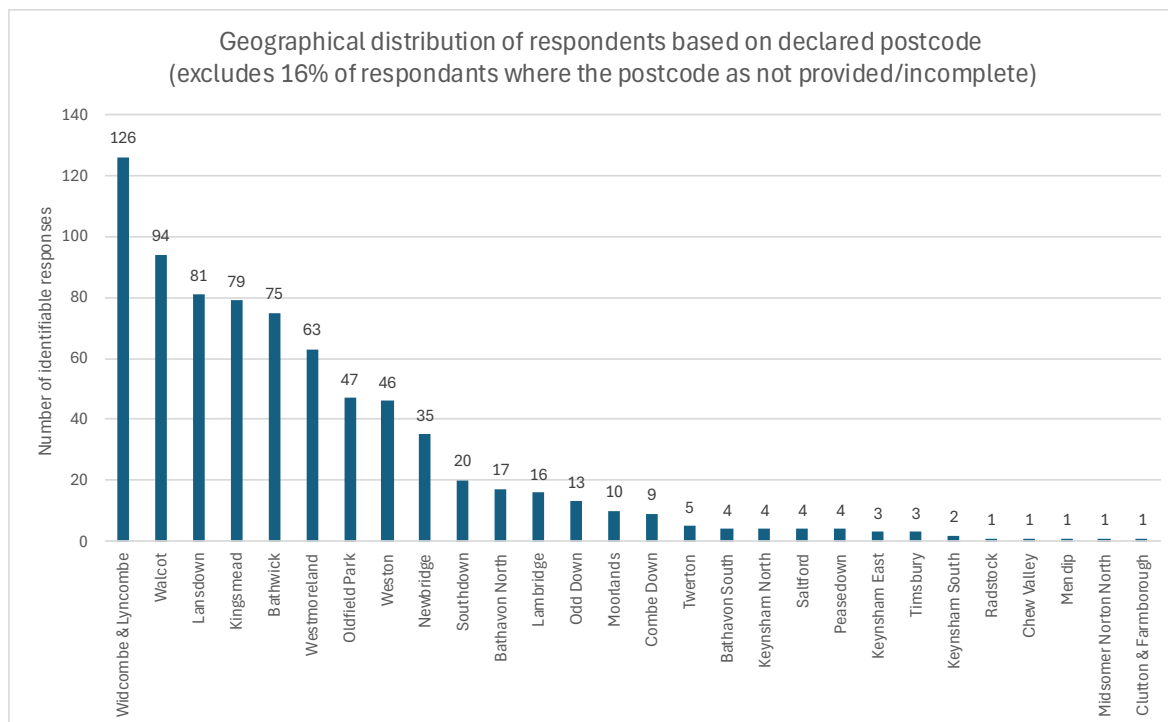


Figure 3 - Distribution of respondent's geographical location, as identified by declared postcode

3.3.3 Analysis of consultation page view analytics shows a total of 11,841 page views during the consultation period, from 1672 individual users identified, i.e., those from a different person or internet address. The average time spent viewing the page is 3m 20s.

3.3.4 55% of people who viewed the consultation pages (counting unique views only) went on to submit a response (including all channels).

3.4 Quantitative Results

3.4.1 Where a respondent has stated that a question is not applicable to them these responses have been excluded from the relevant analysis.

3.4.2 Analysis of the views of respondents to the introduction of an additional charge for resident parking permits based on vehicles size (Figure 4) show that 47% (426) are supportive, with 49% (452) not in support.

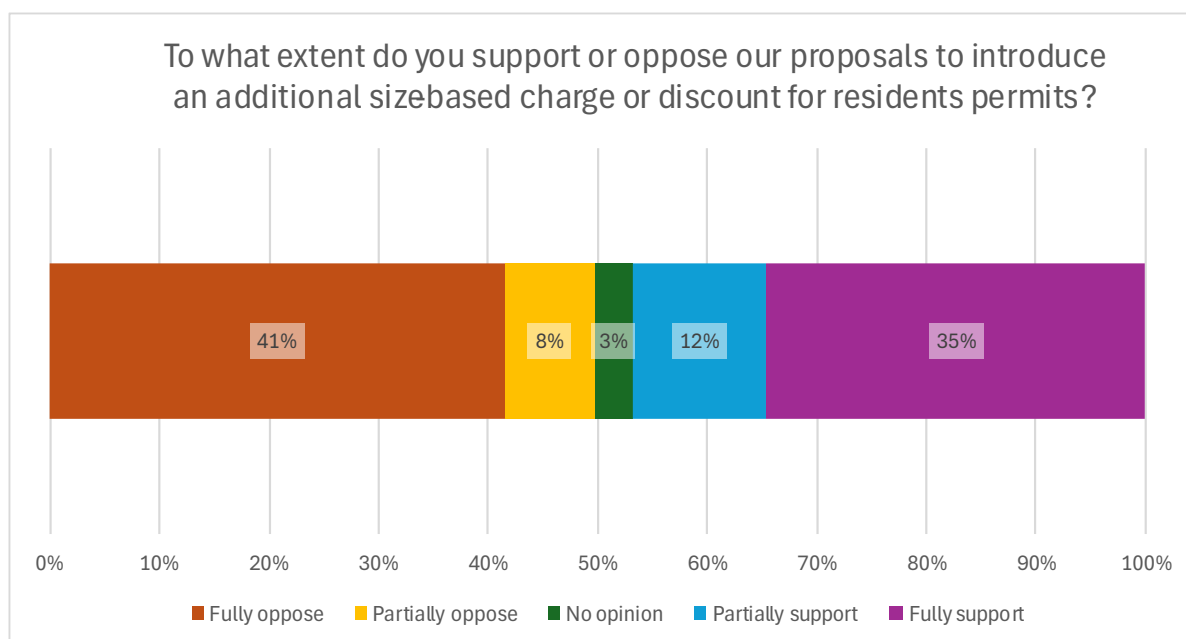


Figure 4 - Respondents view on the introduction of an additional size-based charge for residents parking permits

3.4.3 Proposals for to increase the visitor parking permit charge were supported by 31% (275) of respondents (Figure 5), with 59% (533) not supporting the new charges. 11% (101) of respondents expressed no opinion.

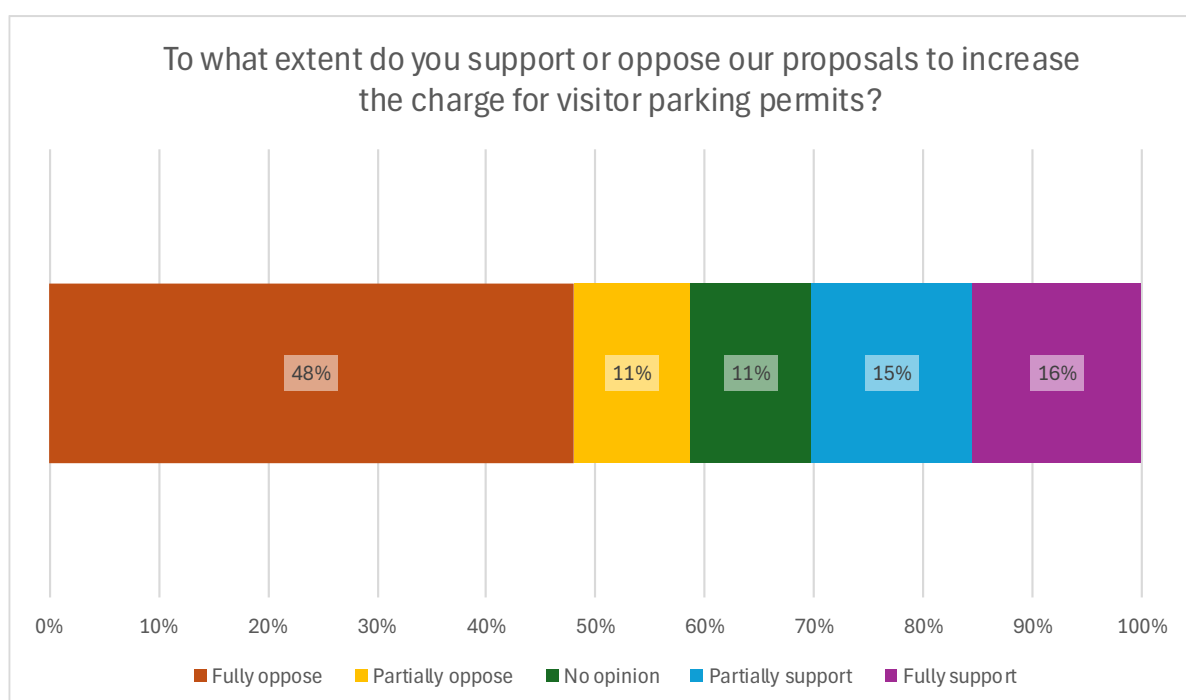


Figure 5 - Respondents view on proposed increases to visitor parking permits

3.4.4 24% (217) of respondents were supportive of proposals for parking charges on Weston Road, Bath (Figure 6), compared to 33% (298) opposing this charge. A further 43% (394) expressed no opinion.

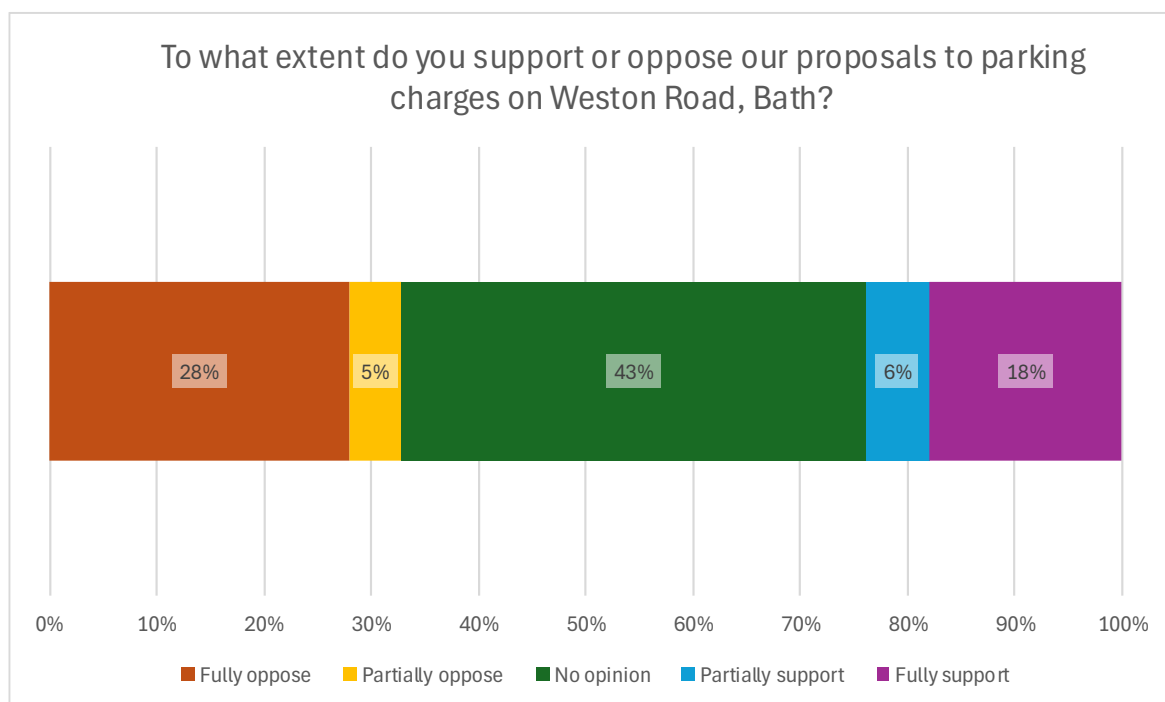


Figure 6 - Respondents view on proposals for parking charges on Weston Road, Bath

3.4.5 24% (221) of respondents were supportive of proposals impacting permit parking on Monmouth Street and Monmouth Place, Bath (Figure 7), compared to 29% (260) opposing this charge. A further 47% (428) expressed no opinion.

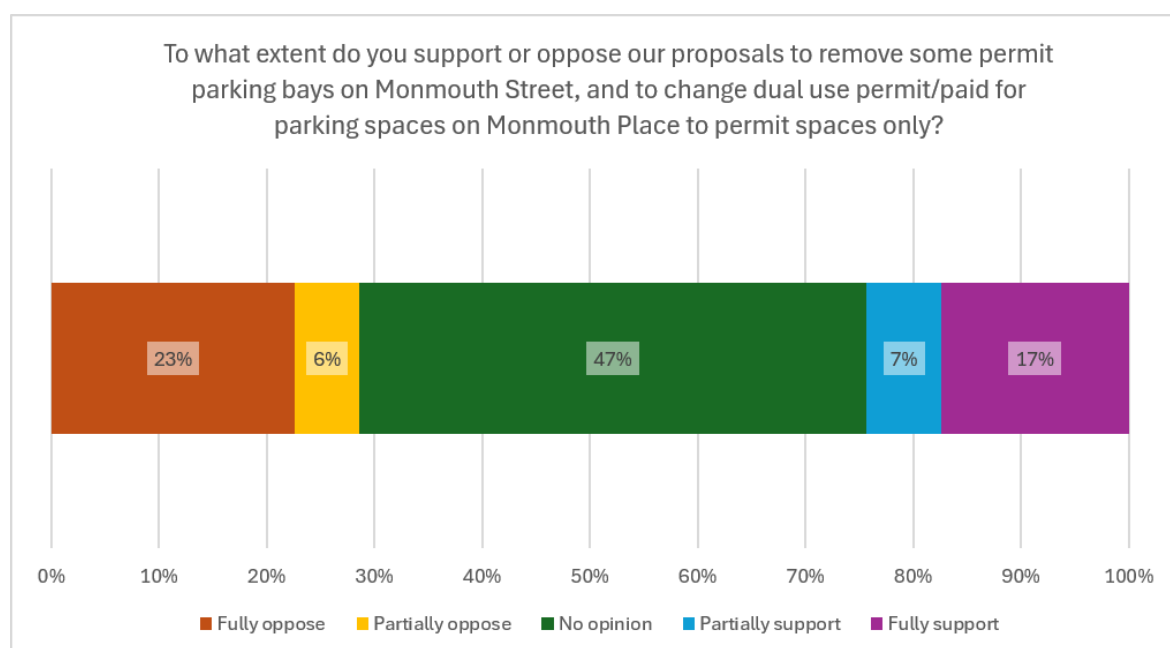


Figure 7 - Respondents view on proposals impacting permit parking on Monmouth Street and Monmouth Place, Bath

3.4.6 The changes to parking charges at our Park and Ride sites for all day parking by non-bus service users were supported by 41% (375) of respondents (Figure 8), with a further 21% (189) expressing no opinion. 38% (345) of respondents were not in support.

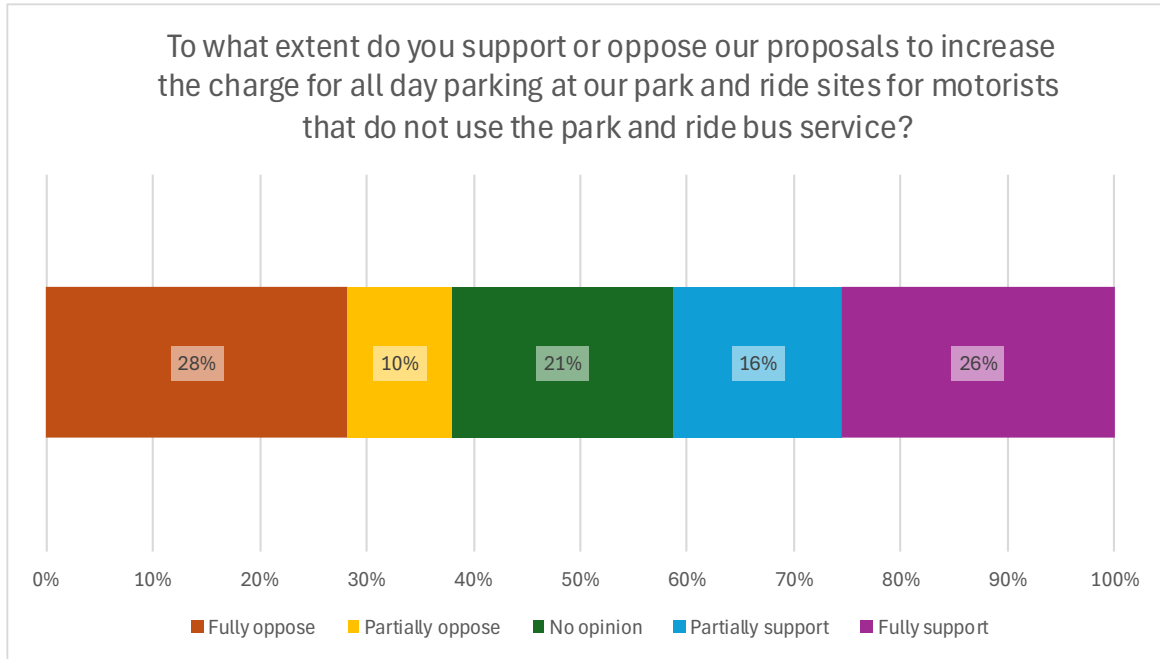


Figure 8 - Respondents view on proposed changes to Park and Ride charges for non-P&R bus service users

3.4.7 The proposed operational changes at a number of Bath car parks were supported by 27% (246) of respondents (Figure 9), with a further 45% (412) expressing no opinion. 28% (251) of respondents were not in support.

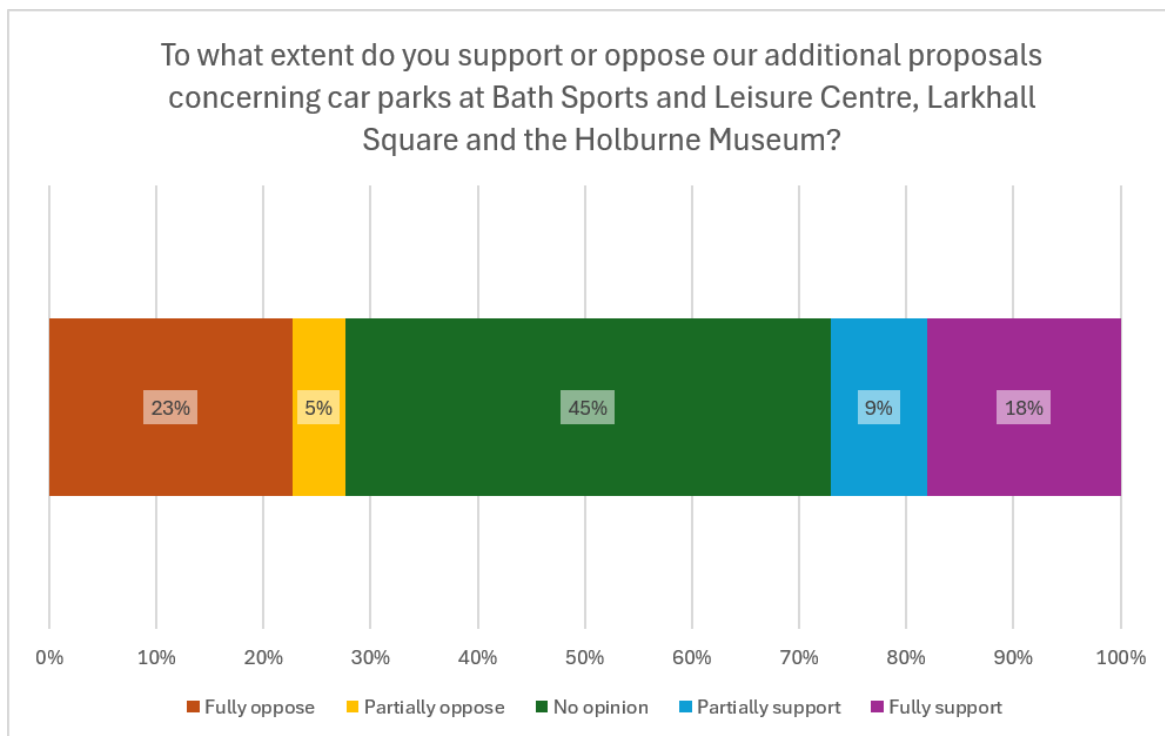


Figure 9 - Respondents view on proposed operational changes to some Bath car parks

3.5 Qualitative Results

- 3.5.1 Free-text comment boxes were provided within the feedback form to allow respondents to provide further details and comment to support their response to the proposal.
- 3.5.2 A total of 2,308 separate free text comments were received across the feedback.
- 3.5.3 Due to the number of individual comments common themes have been identified using Generative Artificial Intelligence (AI) analysis tools.
- 3.5.4 The themes identified in the responses of each question are detailed in this section, with each theme being listed in descending order based on the number of responses that the theme was related to.
- 3.5.5 Emails were analysed separately as the comments could not be aligned to specific questions within the feedback form.

3.5.6 To what extent do you support or oppose our proposals to introduce an additional size based charge or discount for residents permits?

- a) **Fairness, affordability and regressivity (cost-of-living impacts)** (174 respondents, 27%):

Respondents contend that the policy risks imposing an additional and disproportionately high financial burden on residents already grappling with rising living costs, as vehicle size differentials layered atop emissions tariffs could penalise families, carers, older or lower-income households, tradespeople and those without off-street parking who cannot easily replace a larger vehicle. Policy may act as a stealth tax or dual penalty by adding size-based charges to existing vehicle taxes and permit fees and could be regressive, affecting those with limited means while offering little benefit to those able to absorb extra costs. Concerns are raised that larger cars often represent necessary transport for multi-child families, individuals with mobility needs or residents in areas poorly served by public transport and that the measure assumes access to alternatives that many cannot afford or use. Calls are made for clear local evidence of a size-related safety or congestion problem, socioeconomic impact assessments, and exploration of more targeted or supportive measures such as exemptions, caps or improvements to alternative transport before imposing new charges. Some note that modest discounts for smaller vehicles offer limited relief and suggest that the council might better address inefficiencies or reprioritise other funding streams rather than pursue further parking levies.

b) Impact on households needing larger vehicles (families, disabled, carers) (127 respondents, 19%):

Respondents argue that the policy unfairly penalises households requiring larger vehicles due to family size, disability or caring responsibilities. Families needing space for child seats, pushchairs, luggage or extended family travel may be unable to switch to smaller vehicles given legal seat-fit requirements, long distances to school and childcare, and limited public transport. Disabled drivers often require estate cars or MPVs to accommodate wheelchairs, mobility scooters or specialist equipment, making smaller vehicles impractical or inaccessible. Car replacement represents a major financial decision amid the cost-of-living crisis and pre-arranged finance, limiting flexibility. Charging by vehicle size is described as discriminatory, punitive and tantamount to a tax on families and disability, disproportionately affecting large or single-vehicle households with no off-street parking. Exemptions or caps for carers, families and disabled residents could offer a more proportionate approach.

c) Parking space availability and street space efficiency (123 respondents, 19%):

Respondents emphasise that larger vehicles occupy disproportionately more on-street space and reduce overall parking availability. Size-based permit fees are described as logical because vehicle length and width determine kerb space usage and affect manoeuvrability and visibility. Discounts for smaller vehicles are viewed as incentives to shift ownership towards cars that impose less demand on limited street spaces. The policy is considered fair on the basis that permit charges would reflect the extent of public realm used for private vehicle storage. Local variation in parking pressure is highlighted, with densely parked central streets seen as bearing greater justification for size-based charging than less constrained residential areas. Bay dimensions and parking behaviour could limit the effectiveness of area-based fees, prompting suggestions that vehicle width or bay fit would better target obstruction. Multiple-permit households and non-resident vehicle use are noted as factors exacerbating parking strain. Concerns are raised that a purely size-based approach may overlook vehicle usage patterns and local context, while weight-based charges are proposed by some to account for road surface damage.

d) Policy motivation and perceived revenue-raising (100 respondents, 15%):

Respondents described the policy as a stealth tax or cash cow, seeing it primarily as a revenue-raising exercise dressed up as an environmental or safety measure. Size-based charging may be perceived as a way to penalise motorists and boost council coffers rather than address specific parking problems, with inclusion of wing mirrors viewed as a tactic to inflate charges. Introducing different bands could give the impression of unfairly targeting residents rather than incentivising smaller vehicles and may seem disproportionate when alternative cost savings or funding sources could be pursued. The consultation may appear perfunctory and driven by ideology,

suggesting a revenue-generating objective rather than genuine behavioural change or road safety improvements. Questions over the policy's evidence base and concerns that it amounts to a stealth tax on wealth and aspiration reinforce the view that its primary aim is to raise income rather than deliver measurable public benefit.

e) Effectiveness and likely behavioural change (79 respondents, 12%):

Respondents say the policy could encourage consideration of vehicle size and a shift towards smaller cars and public transport. Costs are deemed too modest to prompt households whose vehicle choice meets practical needs and may be absorbed by those with financial flexibility or drive the purchase of two smaller cars, thereby counteracting objectives. Evidence for parking permit fees influencing purchasing decisions is lacking, and levying charges on already owned vehicles operates retrospectively and is unlikely to alter future choices. Disincentivising multiple permits may suppress ownership of extra vehicles, and discouraging oversized cars could ease street congestion. However, unintended outcomes such as increased scrapping of cars, greater on-street parking by displaced travellers or favouring small yet more polluting models could undermine aims. Behavioural change is seen as possible but minimal without heftier levies or complementary transport infrastructure improvements.

f) Measurement method and banding (area vs length/width/height/mirrors) (59 respondents, 9%):

Respondents disagree over whether vehicle size should be measured by area or by individual dimensions such as length, width or height and whether wing mirrors should be included in the calculation. Measuring by length only may more accurately reflect parking space usage than calculating area using width and length. However, width could be more relevant to prevent overly wide vehicles obstructing adjacent bays. Height and kerb weight may also influence road wear, safety and parking fit and could supplement any size-based charge. Including fully extended wing mirrors may overstate the vehicle's parked footprint because mirrors often retract and manufacturer data typically reports width excluding mirrors. Band thresholds based on two-dimensional footprints may wrongly capture modest family hatchbacks and could be raised or smoothed with a base-cost band. Weight, or mass in service, could provide an alternative or additional basis for defining oversized vehicles. Band jumps with minimal area differences may produce disproportionate cost changes and could be adjusted to avoid abrupt escalations. A maximum width standard, such as two metres, paired with measurement excluding mirrors, may simplify the scheme and align with existing transport restrictions.

g) Road safety, obstruction and emergency access concerns from larger vehicles (59 respondents, 9%):

Respondents note that larger vehicles can obstruct Bath's narrow streets,

restrict visibility at junctions, impede emergency vehicles and increase potential injury severity for pedestrians and cyclists. Vehicle size alone may not inherently create safety risks without irresponsible parking or driver error, and a footprint-based charge may overlook height, modern safety features and Bath-specific collision data. The proposed policy could encourage smaller, more sustainable cars and ease congestion in residential areas but may unfairly penalise families who need larger vehicles. Targeted local measures such as restricted zones, enhanced enforcement or redesigned bays could address obstruction or emergency access issues more precisely.

h) Impact on tradespeople, business vehicles and vans (42 respondents, 6%):

Respondents emphasise that the proposal would disproportionately penalise families, disabled residents and tradespeople who require larger vehicles by necessity and may struggle to absorb the extra costs. It fails to distinguish between private large cars and legitimate work vehicles such as vans used to carry tools and equipment and could amount to an unintended business tax likely to be passed on to customers. Supplementary charges could apply to commercial vans and large SUVs perceived to occupy excessive road space as an alternative to a blanket size-based tariff. Exemptions or low-cost tradesperson permits could ensure practical access to essential services, and mitigation measures could address needs of wheelchair accessible taxis, light commercial vehicles and multi-purpose vehicles used by families, carers and self-employed workers. Basing charges solely on vehicle area is criticised as ignoring necessity, with retention of emissions-based charging for vans or differentiation between private and commercial use flagged as more equitable alternatives.

i) Administration, data verification and practical implementation (38 respondents, 6%):

Respondents highlighted administrative and practical challenges in implementing the policy. Proposed reliance on AI for calculating charges could produce inaccurate information. Vehicle dimensions tables may contain errors, as shown by a Ford Fiesta length discrepancy. Clarification may be required on how the policy would handle households switching between multiple vehicles under a single permit, including temporary swaps and visitor cars. Frequent vehicle changes may prove impractical for carers transporting disabled family members and could lead to unfair charges. Processing queries and complaints may demand significant staff time and resources. Existing permit terms may conflict with the proposal, for example maximum length limits and vehicle classifications. Relying on official size data may be difficult to gather and verify, particularly for imported or unregistered vehicles. Including wing mirrors in size calculations may be contested as irrelevant to available parking space. Permit amendments via a mobile app may be

inconvenient and risk fines if not updated promptly. A phased introduction by area could ease administrative burdens. The creation of new rules for mid-year vehicle changes, permit sharing and courtesy car use may be necessary to avoid confusion. Mandatory MOT evidence could improve data accuracy. Linking permits to council tax accounts with monthly direct debit payments and free online vehicle updates could streamline administration. A simpler, more consistent charging structure that reduces or justifies administrative fees could help minimise complexity. Credible enforcement and clear guidance could maintain public confidence and support fair application of permit conditions.

j) Interaction with existing emissions-based tariffs and EV/zero-emission vehicles (37 respondents, 6%):

Respondents state that applying a size-based surcharge to zero-emission vehicles contradicts the council's own emissions-based charging framework, which was designed to reward cleaner vehicles. Adding a size-based charge on top of existing emissions-based tariffs would effectively penalise residents twice for selecting larger low-emission or zero-emission models, sending a confused signal that undermines net zero ambitions. Charging by footprint is seen as unfairly punitive to electric cars, which tend to be physically larger to accommodate battery and safety requirements, while allowing smaller high-emission vehicles to attract lower fees. Treating size and emissions as independent, cumulative add-ons could discourage sustainable choices by moving the goalposts after residents committed to electric vehicles under the assumption they would be incentivised. The absence of size-based discounts for smaller zero-emission vehicles, coupled with higher charges for second permits, risks compounding costs already incurred through emissions-based fees and visitor tariffs. Emissions are viewed as the essential criterion for promoting clean transport, and many argue that exemptions or meaningful discounts should be applied to electric vehicles regardless of size, rather than imposing a space-based surcharge that favours smaller, more polluting cars over larger cleaner ones.

k) Enforcement, targeted local measures and alternatives to a blanket borough-wide charge (32 respondents, 5%):

Respondents suggest that targeted enforcement, local restrictions and improvements may offer a more proportionate solution than a borough-wide size-based permit charge, and that visible, consistent patrolling of controlled parking zones and strict application of existing yellow-line and access rules would enhance compliance and public confidence. Better street design, marked parking bays and installation of passing places could alleviate obstruction in specific locations where larger vehicles currently hinder buses or emergency services. Exemptions or caps for carers, family vehicles and practical uses may prevent undue hardship while limits on the number of

permits per household could ease pressure in high-density areas. Higher, promptly applied penalties and use of camera enforcement could deter illegal parking more effectively than blanket surcharges. Local evidence of parking scarcity should guide any measures, ensuring restrictions and permit charges apply only where genuine overcrowding occurs. Specific rules for properties with multiple vehicles, such as HMOs, could redistribute demand more fairly. By contrast, reliance solely on vehicle dimensions for permit pricing could risk penalising compliant residents without addressing hotspot misconduct or guaranteeing that problem drivers are prevented from obstructing traffic in the streets where it matters most.

l) Evidence base, local data and monitoring / need for demonstrable justification (28 respondents, 4%):

Respondents argue that the evidential base for the size-based charge or discount policy is inadequate and lacks demonstrable justification. The combined impact on ordinary households may not have been adequately assessed and no Bath-specific road safety, travel behaviour or environmental monitoring appears to have been published to support the claim that larger vehicles disproportionately cause collisions or congestion. The assumption that vehicle size is continually increasing is not substantiated by local data and theoretical modelling alone may not reflect the slow-speed urban traffic conditions in Bath. No clear targets or measurable outcomes have been set and air quality improvements are tracked at city level and largely attributed to the clean air zone and broader transport policies rather than residents' parking zones in isolation. The proposal may feel more focused on raising revenue than addressing a clearly evidenced parking problem and could place additional financial pressure on residents without evidence that it would materially increase parking availability, improve safety or reduce emissions. A root cause analysis, zone-specific collision and pollution statistics, behavioural change modelling and an equality and socioeconomic impact assessment would be needed before the policy could be judged proportionate and effective. Conversely, conceptual logic to consider vehicle size alone does not suffice without transparent local evaluation, year-on-year monitoring and published evidence directly linking the policy to its intended benefits.

m) Road wear, weight and infrastructure damage from heavier vehicles (28 respondents, 4%):

Respondents endorse charging larger vehicles extra to reflect higher road wear and infrastructure damage but argue that assessing only vehicle area is inadequate because weight and, to a lesser extent, height also influence surface degradation and should be incorporated into the scheme, for example through a weight multiplier or by linking fees to kerb weight, with heavy electric vehicles cited as a key example of vehicles that would otherwise

escape higher levies despite causing greater wear.

n) **Second permits and multi-car household charging** (27 respondents, 4%):

Respondents argue that the additional size-based charge should be accompanied by a more significant surcharge for second permits to reflect the greater pressure multi-car households place on road space. Second permits are deemed already subject to a premium under existing emissions-based tariffs and layering a further size multiplier is considered to create a compounding financial penalty that may be disproportionate to kerb-space occupation. It is suggested that the extra levy should apply only to newly added vehicles and that charges for second and third permits could escalate substantially to deter multiple-car ownership and promote single-car households. Resistance is expressed to the proposal that size-based discounts would not extend to second permits, which may penalise households requiring a second vehicle for work or family needs. A higher second-vehicle surcharge is considered more aligned with the policy's aim of reducing congestion than applying size-based charges across all permits, while an approach focusing on vehicle length rather than width could simplify the scheme. Conversely, support exists for a modest charge on large first vehicles and a much higher levy on large second vehicles as fairer treatment. The combination of elevated second-permit fees and size-based charges is regarded as unjustified and potentially excessive.

o) **Transition, retrospective application and timing of implementation** (24 respondents, 4%):

Respondents express concerns about the retrospective application and timing of the proposed size-based charge on residents' permits. It is unfair to penalise people again on size after they have already invested in lower-emission vehicles without the benefit of hindsight. Any implementation is suggested to include reasonable grace periods, appeal rights and protection for households acting in good faith. A minimal increase around 10% spread over three years could produce a fairer transition. Penalising actions retrospectively rather than influencing future decisions undermines trust in council environmental policies. Clarification may be needed on how temporary replacement or courtesy vehicles would be treated when calculating charges. Abrupt introduction without area-by-area or phased rollout may trap households with long-term liabilities and no affordable exit strategy. Time may need to be allowed to review the impact of recent changes before adding further charges and to explain how permit changes should be handled mid-year or for vehicle swaps. Application of higher charges to existing permit holders feels like retrospective taxation and could punish decisions already made under earlier incentives to transition to electric vehicles. Introducing levies after purchase may unfairly penalise those unable to change vehicles and suggests that taxation at point of sale would be a better approach. A

transition of this magnitude may require extensive, long-term notice to shift policy logic from air quality to physical road space.

p) **Displacement and wider parking system effects (spillover to other streets / park & ride)** (6 respondents, 1%):

Respondents warn that introducing size-based permit charges could displace parking into nearby residential streets and increase pressure on surrounding communities while risking long-term parking in unsuitable locations such as park and ride facilities. Restricting parking on Weston Road may force residents to leave vehicles at park and ride sites or use cul-de-sacs at Cranwells Park, exacerbating existing parking issues and prompting commuters to occupy free local streets. Concerns are raised that SUV size surcharges will push neighbours into adjoining roads and that higher park and ride charges would drive drivers back into residential areas or the city centre. A discount for smaller vehicles may encourage students to park on family streets, further intensifying parking pressures. Calls are made to provide clear evidence of current problems, assess likely displacement effects on residents and businesses, and consider alternative options before implementing charges.

q) **Other** (456 respondents, 70%):

Respondents noted that the withdrawal of Sunday parking on the Paragon was implemented without adequate signage or explanation, creating uncertainty, and highlighted that many households now operate multiple vehicles for practical, multigenerational or work-related reasons. The policy's reliance on vehicle measurements was questioned where features such as automatic transmissions, raised suspensions for pothole avoidance or adaptations for disabled users are a necessity rather than a choice. Displacement of parking into neighbouring unrestricted roads, notably Cranwells Park, was cited as a predictable consequence of new restrictions on Weston Road, prompting calls for simultaneous extension of residents' zones to prevent simply transferring pressure. Demand was expressed for clearer presentation of charging bands and transparent reporting of how revenue will be reinvested in road maintenance, guaranteed parking bays, off-street options or public transport enhancements. Proposals to link permit costs to council tax bands, to offer discounts for low on-street users and blue-badge holders, and to secure lamp-post EV charging and improved park-and-ride services before new levies were seen as ways to balance fairness, individual circumstances and Bath's narrow historic streets.

3.5.7 To what extent do you support or oppose our proposals to increase the charge for visitor parking permits?

a) **Pace of increase and indexation (inflation-linking) and proportionality** (89 respondents, 16%):

Respondents note that visitor parking permit charges have not kept pace with inflation in recent years and that an increase limited to inflationary levels might be understood but characterise the proposed 50% annual rises, culminating in a 2.5-fold cost increase over three years, as disproportionate. The rationale of covering administration and enforcement costs does not appear to justify tripling the cost of a permit within the period and the phased increments are insufficient to mitigate the scale of the rise. Conventional inflation-linkage through CPI or RPI adjustments is regarded as more proportional, with a phased or longer-term approach recommended over steep upfront increases. Concerns arise that excessive percentage increases during a cost-of-living crisis could create affordability issues for households with limited visitors or those requiring care visits, and that endpoint pricing rather than incremental steps determines impact. The current scheme was designed to cover existing costs, calling into question claims that sharply higher charges are needed, and a modest adjustment tied to measured cost movements is advised.

b) **Lack of clear justification, evidence or cost transparency for the scale of the increase** (80 respondents, 14%):

Respondents highlight a lack of clear justification, evidence or cost transparency underpinning the proposed permit charge increases. The scale of the rise appears arbitrary without a detailed breakdown of administration and enforcement costs, and no evidence is offered to show that charges align with actual expenses or will yield meaningful behavioural change. The absence of clarity on revenue allocation fuels concern that the measure functions as a general revenue-raising tax rather than a cost-recovery exercise. A credible case would require published costings, inflationary drivers and demonstration of proportionate benefits, yet no transport or environmental modelling or service improvement data has been presented. Ringfencing of additional income for road or public transport schemes and evidence of efficiency savings are seen as essential prerequisites before any decision is made.

c) **Impact on carers, healthcare visits and essential support/tradespeople** (63 respondents, 11%):

Respondents contend that increasing visitor parking permit charges risks undermining essential visits from carers, healthcare professionals and tradespeople by imposing prohibitive costs. The increase could deter visits that uphold family connections, community support and independent living, and place an extra burden on households reliant on necessary rather than

discretionary visits. Charging above other paid parking may seem unfair for those visiting in a caring capacity and could lead contractors to pass on higher parking costs in repair bills. Carers and health visitors may be discouraged by the higher charge, while households accommodating informal welfare care, childcare support or elderly relatives could face significant additional expenses. Older or disabled residents, lower-income households and those living in older properties requiring regular maintenance may be disproportionately affected. Exemptions or discounted arrangements for essential visitors such as carers, healthcare professionals and tradespeople may be needed to avoid unintended consequences for social care, independent living and property upkeep under the new policy.

d) **Affordability and financial impact on low-income, elderly and vulnerable residents** (59 respondents, 11%):

Respondents warn that the proposed visitor parking permit increase could disproportionately burden low-income, elderly and other vulnerable residents who may rely on regular visits for social support and essential care. Higher charges could deter family and friends, risking social isolation and undermining informal care arrangements for housebound or mobility-limited individuals. Increasing costs on those already facing high living expenses may force difficult trade-offs between basic needs and maintaining social connections. The absence of concession rates for pensioners, those on universal credit or with limited digital access may exacerbate inequalities and penalise residents without off-street parking or alternative transport. The increase risks conflicting with council aims on community wellbeing by imposing an additional financial barrier to visiting central areas, and could be considered disproportionate unless offset by discounts or evidence of necessity and proportionality.

e) **Impact on local economy, tourism and retail spending** (42 respondents, 8%):

Respondents warn that raising visitor parking permit charges could deter family and friends from visiting and thereby weaken local retail spending and tourism revenue. Increasing the cost may drive potential visitors to out-of-town shopping complexes or alternative towns with lower charges, reducing business rates and retail income within the city. Higher charges could exacerbate existing barriers posed by parking fees and ticketing fears, risking isolation for vulnerable or older residents who rely on regular visits. Visitors are described as the lifeblood of the city's economy, contributing through shopping, dining and other local spend, so adding incremental permit costs over three years may be counterproductive to sustaining tourism, protecting local businesses and avoiding further forms of taxation.

f) **Unused hours, expiry period, minimum bundle size and flexibility of permit products** (39 respondents, 7%):

Respondents highlight that purchasing visitor permits in fixed 100-hour bundles could result in paying for unused time when visits seldom match that allocation and that the 12-month expiry may leave permit holders out of pocket. hours could be allowed to carry over beyond the current validity or be refunded to ensure fair value, and extending the expiry to several years is proposed. offering smaller or tiered bundle options—such as 15-minute increments, 30-minute blocks or batches of 10, 25 or 50 hours—may provide necessary flexibility and reduce over-purchase. digital permits could be configured not to expire automatically, and an adjustment or cancellation facility for booked slots could minimise wasted hours. removing the annual cap for central zone holders, introducing special or tiered charges for different visitor types and linking any price increase to a rollover or refund mechanism could make the proposals more acceptable.

g) **Distributional fairness between residents with/without off-street parking and perceived double-charging** (38 respondents, 7%):

Respondents challenge the distributional fairness of the policy, arguing that increasing visitor parking permit charges would constitute double-charging residents who already pay substantial council tax and primary permit fees and unfairly penalise those without off-street parking, since households with private drives would avoid the extra cost. Charge penalises people living in central Bath with no alternative parking, may exacerbate financial burdens amid rising living costs, and would remove the compensatory value of reasonably priced visitor permits. By contrast, funding visitor parking via council tax or including it within existing permits could ensure equitable treatment. Moreover, imposing a 150% increase appears disproportionate to actual administration costs and inconsistent with equality and inclusion aims, leading to calls for free visitor permits or their inclusion in council tax charges.

h) **Enforcement and administration adequacy as a precondition for charging increases** (34 respondents, 6%):

Respondents argue that the policy to raise visitor permit charges may only be justified if enforcement and administrative processes are demonstrably efficient, with clear evidence of changes in enforcement activity and cost. Enforcement of current RPZ rules appears to be weak, with wardens rarely seen in many streets and time-limited bays often left unmonitored for days on end, so charging more without first strengthening patrols and reviewing enforcement hours would represent poor value. Efficiency savings in administration should be identified and any increase linked to actual rises in RPZ costs rather than an arbitrary 150% hike, and enhanced measures against permit misuse—such as tighter checks, 24-hour policing and tougher

penalties—would be expected alongside higher charges. Revenue from stricter enforcement, including penalty income from illegally parked vehicles, could plug funding gaps more effectively than blanket price rises, and transparency over policing costs and administrative outlay is needed to justify any increase.

i) **Vehicle-size or usage-based charging as a design option** (26 respondents, 5%):

Respondents argue that visitor parking permit charges could be linked to vehicle size, requiring costlier permits for large cars or vans and lower rates for micro or small vehicles to mirror differing space usage, pollution and safety impacts, since the policy's flat increase fails to account for these variations. Tiered usage-based charging is proposed, applying higher fees after an initial allowance of hours or differentiating short-stay and long-stay use to discourage prolonged or high-frequency parking and focus charges on building works or business visitors. However, large-vehicle surcharges may be questioned on the grounds that small cars can equally impede access when bays are deemed wide enough, so precision in targeting true oversized vehicles could be needed. Special permit categories for regular visitors, cleaners or other short-term users are suggested as an alternative to blanket price rises.

j) **Need for zone-specific or locally responsive pricing and operating arrangements** (14 respondents, 3%):

Respondents argue that the proposed visitor parking permit price increases should reflect local demand and operating conditions across different controlled parking zones. Uniform charges are seen as disproportionate in areas where parking capacity is abundant or pressure is limited and operating restrictions could avoid seven-day enforcement where space is available. Reduced operating days or zone-specific pricing could lower costs and better target zones experiencing genuine scarcity, while reciprocal concessions for households most affected by year-round restrictions could mitigate the impact of higher charges. Increasing visitor permit charges by 50p annually through to £2.50 per day may be unjustified in locations with routinely available spaces and may be viewed as revenue-raising rather than a parking management measure. Adjusting the scale of increases or adopting a locally responsive approach is proposed to ensure that charges align with actual parking demand and conditions within each zone.

k) **Misuse and abuse of visitor permits by holiday lets, HMOs, commuters or commercial users** (12 respondents, 2%):

Respondents point to misuse of visitor permits by holiday lets, HMOs,

commuters and commercial users as a key issue in central Bath. Commuters living outside the city may use permits intended for short visits to secure cheap all-day parking, while short-term let operators may treat visitor hours as a revenue stream by including passes with Airbnb bookings. HMOs may exploit the system to park additional cars, and private individuals may sell or lend permits to non-visitors for shopping or event parking. Distinction between private residential visitor permits and business-purpose permits for holiday lets and commercial operators may be needed. Raising permit fees under the policy is considered a justified step to deter non-resident use, though reliance on price alone could fail to resolve misuse without enforcement and allocation controls. Measures such as stricter permit allocations per household, explicit prohibition of commercial use, review of permit issuers and enforcement against unlawful transfer or sale may be required alongside any price rise.

l) Behavioural consequences: non-compliance, displacement and parking patterns (12 respondents, 2%):

Respondents anticipate behavioural consequences if the proposed policy to raise visitor parking permit charges is implemented. Increased costs could drive residents to host visitors in towns outside Bath or at out-of-town shopping centres, diverting local spending and meeting arrangements away from the city. Visitors and tradespeople may seek free parking in neighbouring unrestricted streets, displacing demand rather than reducing it. Perceptions of low enforcement risk could encourage parking without permits, and a rise to £25 per 100 hours by 2028 may be deemed unaffordable given typical usage, resulting in reduced permit purchases and unresolved parking pressures.

m) Product design and digital accessibility (paper vs digital, smaller time blocks, usability) (12 respondents, 2%):

Respondents highlight accessibility and usability issues in the digital-only booking model and call for maintaining paper permits alongside digital options, noting some users lack digital means. Demand exists for smaller permit bundles—requests for 10, 20, 25, 50-hour increments—and for shorter booking intervals of 15 or 30 minutes to prevent wasted hours during brief visits such as child drop-offs. A flexible system that allows editing or cancelling permits when arrival or departure times change is sought to avoid unused time. Proposals include online visitor registration or pre-purchased booklets, accommodating different purchasing habits by treating paper and digital transactions distinctly, with a potentially higher minimum for paper to reflect extra administration. The process should remain straightforward and accessible to residents less confident with apps, preventing exclusion of elderly users or those without computing access.

n) **Requests for exemptions, concessions or targeted discounts (carers, disabled, low-income)** (10 respondents, 2%):

Respondents argue that exemptions or discounted arrangements should be provided for carers and healthcare professionals, essential medical visits, and tradespeople carrying out work at a property. Special charges could be tiered to accommodate short-term visitors such as cat sitters and cleaners rather than treating all visitor parking uniformly. Charges based on household income may prevent disproportionate impacts on low-income households, with a discount mechanism suggested for those on universal credit. Higher visitor parking charges could unfairly penalise wheelchair users due to the need for larger vehicles, and relatives visiting disabled residents may require free or reduced-cost permits to provide care. Protected or discounted permits for carers are seen as necessary to support disabled residents who may have frequent visitors for personal care and family support.

o) **Comparative pricing and benchmarks with other authorities or parking options** (7 respondents, 1%):

Respondents note that the proposed permit charges exceed those applied in neighbouring Keynsham, Portsmouth and Bristol, where visitor parking may be free for 50 days through council tax or cost under £30, and that Park and Ride increases are capped at around a third while visitor permit costs would rise by 250%. Comparisons are drawn with inner London, where free Sunday parking is said to be permitted, and it may be argued that prices should remain below other paid parking to protect visitors in a caring role. However, a viewpoint holds that an eventual rate of £25 per 100 hours remains good value, and alignment with nearby authorities is seen as necessary to maintain fairness.

p) **Other** (417 respondents, 75%):

Respondents emphasise the need for clearer evidence and proportionate alternatives to a straight charge increase. Administration and enforcement costs could be addressed through efficiency measures such as reduced staffing levels, use of AI or more targeted patrols aided by cameras rather than blanket price rises. Time-based limits or household permit quotas may offer demand management without imposing a disproportionate financial burden on users. Marked bays or enhanced monitoring could curb misuse and ensure that permit holders benefit directly. Park and ride capacity could be expanded to offer genuine alternatives for visitors and alleviate on-street pressure. Transparency on how revenue is used, including published impact assessments covering social, economic and accessibility effects, may improve trust. Targeted concessions for carers, residents with private driveways or those with mobility needs could mitigate hardship. Removal of underutilised or locally unwanted RPZ areas and reconsideration of Sunday charging where

consultation was limited may address underlying issues more fairly. Overall, demand management, improved enforcement and alternative provision should be considered before further increasing visitor permit charges.

3.5.8 To what extent do you support or oppose our proposals to parking charges on Weston Road, Bath?

a) Desire to retain some free on-street parking or limited free durations (45 respondents, 15%):

Respondents emphasise the value of retaining free on-street parking or limited-duration free periods on Weston Road as an unrestricted kerb space close to the city centre that remains free. Free parking for up to one hour is regarded as a useful incentive to walk into town, support local shops and visit Royal Victoria Park, with a two- or three-hour limit seen as fitting the needs of residents, commuters and allotment holders working on nearby plots. A fixed free period of up to four hours may enable households with only one central zone permit to avoid additional charges, alleviate the challenge of steep local hills and reduce reliance on buses for short trips. Full removal of free spaces is viewed as an added financial burden that could undermine businesses, restrict park access, eliminate the ordinary safety benefit from active street use and erode a remaining free parking option in Bath. However, proposals to replace unrestricted parking with charges could threaten the convenience and economic vitality that the existing free spaces provide.

b) Displacement of parking into nearby unrestricted residential streets (39 respondents, 13%):

Respondents predict that introducing parking charges on Weston Road could displace vehicles into nearby unrestricted residential streets such as Cranwells Park, where unrestricted kerb space would attract commuters seeking free parking and lead to blocked side roads and full cul-de-sacs. Displaced parking pressure may increase overnight and long-stay vehicles, reduce visitor parking options and create obstructive parking in residential lanes. Estimates of up to 70 displaced cars illustrate concerns that charging one area may simply transfer the problem elsewhere. Without additional controls such as residents' parking permits in adjoining streets, displaced vehicles could undermine road safety, fairness and effective use of limited road space and exacerbate existing local parking issues.

c) Perception of the proposal as revenue-raising and need for transparency on use of funds (34 respondents, 11%):

Respondents perceive the proposal to introduce parking charges on Weston Road as primarily a revenue-raising exercise and call for transparency on

fund allocation. The proposal is viewed as an attempt to profit from every nook and cranny, effectively a tax on motorists and a cash cow to shore up council overspending rather than a justified parking policy. Introduction of charges is seen as greedy money-grabbing, with revenue pocketed instead of funding additional parking spaces or addressing genuine parking needs. The scheme is regarded as exploiting visitors to the hospital and ordinary residential streets without clear demonstration of public benefit. Calls emphasise that additional revenue could be visibly reinvested into local transport infrastructure, road maintenance, enforcement and public transport improvements. Without clear evidence of tangible benefits—such as improved parking availability, road safety or service enhancements—the purpose of the charges appears unclear, prompting demands for full transparency on revenue use and measurable outcomes.

d) Affordability and fairness for residents and low-income/working households (34 respondents, 11%):

Respondents argue that introducing parking charges on Weston Road would impose an unfair financial burden on residents and low-income or working households already facing cost-of-living pressures. Charging for parking in areas currently unrestricted could penalise hospital visitors, NHS staff and other workers with essential drives, particularly those unable to afford higher fees or who own older, higher-emission vehicles. The lack of a resident discount is described as exploitative given local council tax contributions, and emissions-based pricing may disproportionately impact households unable to upgrade vehicles. Daily or cumulative increases in permit and tariff costs could exceed minimum-wage budgets and intensify hardship for families with caring responsibilities, risking treatment of roads as revenue sources rather than community assets. Provision of a resident discount or retention of some free parking spaces could recognise local needs and ensure charges remain proportionate, evidence-based and not simply another revenue extraction from residents.

e) Need for alternative travel and parking options before introducing charges (26 respondents, 8%):

Respondents emphasise the need for alternative travel and parking options before any introduction of parking charges on Weston Road. An expanded, frequent short-distance bus network could link Weston to the city centre and surrounding areas, while cheap, reliable park and ride services may offer a viable substitute for on-street parking. Coordination with the RUH could secure dedicated staff parking, potentially through multi-storey or underground facilities, to prevent displacement into residential streets and support hospital shift workers with affordable, early-morning transport. Affordable, integrated public transport would need to be in place before charges are applied to ensure that commuters, staff and visitors have sensible alternatives and to avoid simply penalising car users or displacing parking

pressure into other neighbourhoods.

f) Lack of evidence, justification or transparency for the proposed change
(24 respondents, 8%):

Respondents question the evidence, justification and transparency underpinning the proposed parking charges on Weston Road. Publication of traffic and parking occupancy surveys may be required to demonstrate persistent parking stress, obstruction or safety concerns. Publication of modelling could illustrate how the scheme would proportionately improve traffic flow, air quality or access. Evidence of current misuse of unrestricted kerb space may be expected before imposing charges. Demonstration of previous initiatives' success and council cost savings may be needed to ensure value for money. Rationale for aligning charges with adjacent Royal Victoria Park may be seen as insufficiently explained. Assessment of displacement effects and consideration of less restrictive alternatives may be viewed as necessary. Identification of measurable public benefits and clear explanations of intended beneficiaries may be demanded. Transparency about the use of additional revenue and evidence of local support could be required to avoid perceptions of revenue-raising for its own sake. Strategic city-wide impact assessment may be thought essential to understand cumulative effects on residential neighbourhood character and accessibility.

g) Road safety, obstruction and access implications from displaced or existing parking (21 respondents, 7%):

Respondents express concerns that displacement of parking from Weston Road to Cranwells Park would worsen congestion, obstruct visibility at junctions and hinder access for emergency vehicles. Heavily parked cars in the cul-de-sac could squeeze driveways, force vehicles onto pavements and reduce space for visitors and tradespeople. Such obstruction could increase risks for pedestrians and children playing or cycling on the street. Existing commuter parking is said to complicate entry to and exit from drives and to cause vehicles to mount pavements, narrowing the carriageway. Introduction of charges on Weston Road may shift approximately seventy cars into Cranwells Park, exacerbating these access and safety issues. Controlled parking zones are proposed to prioritise residents and ensure parking for visitors and tradespeople, which could improve safety for young children. Unrestricted parking on Weston Road is felt to enhance pedestrian safety through natural surveillance, while parking restrictions there could improve cycle path safety by reducing roadside parked vehicles.

h) Need for residents' parking zone / controlled parking in Cranwells Park
(20 respondents, 6%):

Respondents argued that Cranwells Park should be designated as a controlled parking zone (CPZ) like Linden Gardens, Gainsborough Gardens and Sion Hill. Introducing charges on Weston Road could displace commuter parking into Cranwells Park, so implementing a CPZ there could mitigate displacement. A CPZ would ensure that visitors and tradespeople can park close to homes and improve road safety for children. Support for the Weston Road proposals was conditional on a CPZ in Cranwells Park, and a local survey found neighbours favour similar permit schemes. The council should assess displacement effects and extend CPZ controls to Cranwells Park to protect existing residents.

i) **Impact on local businesses and town centre footfall** (17 respondents, 6%):

Respondents warn that the policy to introduce parking charges on Weston Road will deter visitors, with quick short-stay trips at risk, reduce town centre footfall and redirect shoppers to free alternatives, erode spending in local shops, replicate past declines following Sunday parking charges in Victoria Park, penalise small businesses and residents, exacerbate cumulative impacts on Walcot Street traders and ultimately threaten the viability of parking-dependent enterprises unless suitable alternatives are provided.

j) **Loss of free parking for park access and recreational visitors** (13 respondents, 4%):

Respondents state that losing free parking on Weston Road would effectively charge families and recreational visitors for park access and could discourage visits, particularly affecting those with small children, elderly people and local residents who rely on the unrestricted kerb space for easy parking near Royal Victoria Park and its sports facilities. Two hours free parking is suggested as an incentive to visit the park and support nearby businesses, while introducing charges may shift cars onto busier roads, reduce use of the tennis club, golf course and park and prompt a move to local shopping areas. Free parking is seen as valuable for exercise, outdoor activities and ease of access to green spaces, and its removal is feared to mirror past declines in visitor numbers when free parking was withdrawn elsewhere in Bath.

k) **Impact on hospital (RUH) staff parking** (8 respondents, 3%):

Respondents consider that introducing parking charges on Weston Road could exacerbate existing parking difficulties for Royal United Hospital staff who rely on this road for kerbside parking. Hospital staff parking is already described as problematic and could become more challenging if charges are introduced. Onsite parking provision at the hospital is said to be inadequate in both availability and cost, which may force staff to continue using Weston

Road spaces despite the charges. Dedicated free parking for hospital employees could mitigate the impact of the proposed charges. Extended staff shifts and childcare commitments may require parking durations that park and ride or other sustainable options cannot accommodate. Collaborative engagement with the hospital could potentially address staff parking needs alongside the new Weston Road charges.

l) Fairness concerns about emissions-based or size-based charging (6 respondents, 2%):

Respondents argue that penalising owners of larger vehicles may be unreasonable given that residents already contribute through permits, council tax, fuel duty, insurance and other motoring costs. Owners of larger vehicles may need them for family, work, health or practical reasons and extra charges could disproportionately affect those on lower incomes or reliant on older cars. A need for explanation and justification for emissions charges arises when properties fall outside the low emission zone boundary and exemptions are expected for Bath residents. Additional size-based charges and cumulative increases in permit fees, visitor charges and park & ride fares may impose disproportionate burdens on those relying on vehicles for work, caring responsibilities or daily travel, and linking permit costs to vehicle size could unfairly penalise families and tradespeople.

m) Implementation, monitoring and administration costs or burdens (4 respondents, 1%):

Respondents note that the policy to introduce parking charges on Weston Road may incur additional costs to implement and monitor. Introducing charges solely to align tariffs is described as a largely meaningless expense. Careful monitoring may be required to ensure proper administration. Additional revenue generation may need justification if parking attendants lack sufficient training, as errors distinguishing vehicles could prompt appeals.

n) Existing enforcement is inadequate or inconsistent (3 respondents, 1%):

Respondents highlight extremely limited enforcement of existing parking restrictions, citing incidents such as a month-long lapse without penalty for missing a permit payment. Risk of displaced parking could be increased by insufficient enforcement, particularly after emissions-based charge changes in Royal Victoria Park that have prompted non-residents to park in Zone 12 with minimal oversight. The absence of traffic wardens for up to four years in areas such as Cranwells Park suggests enforcement may be ineffective, with vehicles regularly parked unlawfully without consequence. The council's justification relating to congestion and obstruction could be undermined by the lack of visible and effective enforcement. It would be prudent to prioritise

better enforcement of current restrictions before introducing charges on Weston Road.

o) **Other** (221 respondents, 72%):

Respondents noted that support for the charging proposals is conditional on extending controlled parking to surrounding residential roads to prevent displacement and protect local amenity. Concern that introducing fees on Weston Road may merely shift commuter parking into nearby streets such as Cranwells Park, where existing capacity is constrained, and that displaced vehicles could worsen evening and long-stay parking pressures is frequently highlighted. The proposal is described as unfair or punitive for hospital visitors, carers and tradespeople, leading to calls for resident discounts, visitor permit flexibility or permit-only bays, and for complementary measures such as EV charging points, street cleansing and enhanced security. Criticism that charges represent an unnecessary reallocation of kerb space without offering active travel alternatives is counterbalanced by views that emissions-based fees could improve space turnover and generate revenue for road maintenance. The need for clarity on alternative parking provision and for measures to mitigate unintended impacts on neighbouring streets informs calls either to abandon the proposals or to implement them alongside a wider controlled parking zone strategy.

3.5.9 To what extent do you support or oppose our proposals to remove some permit parking bays on Monmouth Street, and to change dual use permit/paid for parking spaces on Monmouth Place to permit spaces only?

a) **Loss of resident permit parking / reduced resident access** (29 respondents, 13%):

Respondents express strong opposition to the proposed conversion of permit parking bays on Monmouth Street to police-only use and the restriction of dual-use bays on Monmouth Place to permit holders only, arguing that such changes would exacerbate an already severe shortage of residential parking and unfairly penalise those who pay for central zone permits and council tax contributions. Parking availability is portrayed as heavily constrained by building works and event-related obstructions, forcing residents to circle streets, park further away and increase vehicle emissions. Relocating skips and portaloos to double yellow lines is proposed as a less harmful alternative, and preserving mixed-use bays is seen as essential to avoid disadvantaging residents who may not secure a permit. The reduction of permit spaces is viewed as limiting legitimate access to parking near homes and failing to account for the existing premium on on-street parking in the area.

b) Affordability and household financial burden of parking changes (23 respondents, 10%):

Respondents argue that changing permit parking bays and converting dual-use spaces to permit-only would increase household parking costs and risk hardship amid ongoing economic uncertainty. Additional permit fees and size-based charges could disproportionately affect residents reliant on their vehicles, while removal of permit bays may push drivers into more expensive car parks. However, any increase may require clear evidence of necessity and proportionality, with phased implementation, fairer pricing and transparent allocation of revenue to avoid undue financial burden. Free or discounted resident parking, improved enforcement and management of existing bays could mitigate costs without appearing revenue-driven. Without such measures, proposals may seem exploitative and contrary to the support of local households already facing cost-of-living pressures.

c) Loss of short-stay / visitor pay-and-display parking and business access (23 respondents, 10%):

Respondents warn that removing short-stay pay-and-display parking on Monmouth Place and converting dual-use bays to permit-only under the policy may force visitors and shoppers to drive around the city centre longer, deter customers from local shops and restaurants, and leave businesses with little chance of attracting trade. Reducing access parking could hamper quick errands such as visiting dry cleaners or collecting paint supplies from Davies, particularly for customers carrying bulky items. Existing alternative car parks, including Kingsmead Square and Charlotte Street, may be full or unsuitable for short visits, making the policy ineffective at mitigating lost bays. The policy may further discourage visitors attending evening meals, theatre performances or Friday night events and could adversely affect small retailers that rely on brief on-street stops. Proposals that strip dual-use permit/paid-for spaces would decrease visitor parking options and risk insufficient provision for both local residents and non-resident visitors, undermining support for local businesses and essential city centre visits.

d) Dedicating bays for police vehicles and whether that is justified (14 respondents, 6%):

Respondents offer a range of views on dedicating bays for police vehicles on Monmouth Street and its justification. Repurposing 25 metres of permit-holder parking is described as reasonable to support rapid deployment and visibility at the new Avon and Somerset Police station, while dedicated bays within the station itself are proposed to avoid displacing resident parking. Failure to secure off-street parking as part of the station development is criticised for obliging use of on-street spaces, and Avon Street is identified as an available alternative location. On-street bays for marked police cars are also deemed

unnecessary given vehicles' existing flexibility to park elsewhere, rendering the proposal retrograde if the station could have accommodated its own parking.

e) Localised zone impacts (zone 6 / Monmouth area) and stakeholder consultation (11 respondents, 5%):

Respondents argue that Monmouth Street residents most directly impacted by the changes should be specifically consulted. Parking availability in the central zone including Royal Crescent is already scarce so a permit does not guarantee a space. Eliminating bays on Monmouth Street and converting dual-use bays on Monmouth Place to permit-only does not replace lost parking and may exacerbate shortages worsened by building works and street furniture. Further reduction risks pushing drivers into neighbouring areas such as Cranwells Park. Monmouth Place should remain in zone 6 rather than be reclassified to the central zone since zone 6 has already lost parking spaces. Repeated removals of central zone parking could intensify city centre parking difficulties. Lack of clarity on proposal impacts has also led to calls for clearer local engagement.

f) Public transport and alternative provision are insufficient to mitigate parking loss (10 respondents, 4%):

Respondents state that public transport and alternative provision are insufficient to mitigate parking loss under the policy. Bus services may not provide a viable alternative since no investment has addressed capacity or reliability, park and ride schemes may feature long queues and high costs, routes may not serve every destination, and traffic delays may render public transport unpredictable. Individuals with limited mobility could face reduced access if on-street parking is removed without compensatory improvements such as additional or cheaper services. In the absence of significant enhancement to bus provision, removal of permit bays could undermine access for residents and workers who rely on punctual travel.

g) Police presence / visibility as justification for the changes (9 respondents, 4%):

Respondents view the proposal as justified by the increased police presence and visibility that the changes would facilitate. Establishing a fully operational police station in Bath would take precedence over maintaining existing permit bays. Allocating 25 metres of parking exclusively for marked police vehicles could enable rapid deployment and bolster street-level policing. Converting dual-use spaces on Monmouth Place to permit-only parking may compensate for the reduction in permit bays while supporting policing needs. Enhanced police visibility in the city centre could act as a deterrent to on-street drug

dealing, vagrancy and money laundering. Improved functionality of the central police station is conditional on adequate parking provision. A return of regular police presence around the station would be gratefully welcomed.

h) Impact on tradespeople, deliveries and short-term loading needs (8 respondents, 4%):

Respondents emphasise that the policy to remove permit parking bays on Monmouth Street and convert dual-use spaces on Monmouth Place could reduce short-stay parking and hinder deliveries, tradespeople and loading activities. Driving into town is sometimes necessary for transporting heavy or bulky items, so parking availability is needed for those trips. Brief on-street parking may be crucial for shop users, particularly for collecting paint or supplies from local traders such as Davies and the paint shop without facing a fine. Proposed changes could complicate deliveries during Theatre Royal bollard installations and deter specialist trades from serving central Bath or carrying out property maintenance. Policy design could better accommodate loading activities and short-stay parking to support tradespeople and shop customers.

i) Traffic circulation, congestion and emissions from reduced parking availability (8 respondents, 4%):

Respondents warn that removing parking spaces will not reduce the number of cars looking for spaces and may increase congestion. Extra driving would actively generate the congestion and localized emissions the council says it wants to prevent. Removal of permit parking bays could push drivers into the “parking combat zone of Cranwells Park” and force drivers to circle and idle more while seeking spaces. Reduced parking would not diminish demand but would simply relocate pressure elsewhere, driving cars into local neighbourhoods. Reducing short-stay parking options on Monmouth Place would compel visitors and shoppers to drive around the city centre for longer periods and could place additional pressure on other dual-use parking areas that are already congested. Reduced residents’ parking could force residents to drive repeatedly in search of spaces, increasing petrol consumption and pollution.

j) Need for replacement or equivalent compensatory parking (7 respondents, 3%):

Respondents argue that the policy for converting dual use spaces on Monmouth Place to permit-only use fails to replace the permit parking lost on Monmouth Street and leaves private cars without mitigation. The council should ensure sufficient alternative provision exists for non-permit holders and other paid parking spaces could be provided in neighbouring streets to offset

the removed bays. If police-only bays are introduced on Monmouth Street, an equivalent number of public spaces should be secured and additional permit-holder bays are essential to compensate for losses. By contrast, spaces could be removed and replaced with larger disabled bays.

k) **Accessibility impacts on disabled, elderly, carers and health workers** (7 respondents, 3%):

Respondents argue that the policy to remove permit parking bays on Monmouth Street and convert dual-use bays on Monmouth Place to permit-only parking may limit essential parking choices for those with mobility constraints, including disabled individuals, the elderly, carers and health workers visiting patients. Mixed-use parking could provide options for residents unable to walk, cycle or scooter long distances. Health workers using medical permits may face reduced parking availability. Removing permit bays could disadvantage people with transport limitations who cannot use buses or walk large distances. Additional dedicated disabled bays with time-restricted use, free provision for disabled users and larger bays should be introduced. The proposals give no consideration to carers of young children and may discriminate against disabled users.

l) **Parking enforcement effectiveness and enforceability of new restrictions** (6 respondents, 3%):

Respondents express doubts about the enforceability of the proposed police vehicle only parking on Monmouth Street, citing the perception that marked Police vehicles may not adhere to standard controls. Enforcement staff may lack necessary qualifications, leading to wrongful ticketing when the numeral zero is mistaken for the letter O, prompting appeals. The council's practice of reallocating public parking to priority uses, such as bays outside the Apex Hotel or disabled parking on St James Parade, is seen to coexist with unchecked double yellow line parking elsewhere. Effective implementation of the proposed restrictions would require active monitoring and penalty issuance to prevent permit misuse and ensure resident benefits. Prioritisation of improved enforcement of existing regulations, accompanied by transparent permit pricing, clear management of resident spaces and accountability for parking revenue expenditure, is viewed as a necessary precursor to introducing new controls. Poor parking control is further indicated by vehicles straddling bay lines and the absence of wardens in areas where unlawful parking frequently goes unpunished.

m) **Other** (175 respondents, 77%):

respondents argue that removing permit bays on Monmouth Street and converting dual-use parking on Monmouth Place would reduce parking

capacity in an area where space is already scarce, penalise local residents and businesses, create a two-tier system favouring public sector workers, and risk deterring visitors and undermining high-street trade. The dedicated police parking allocation is seen as operationally understandable if essential for the new station but should have been factored into site selection and should not come at the expense of existing parking needs. Concerns are expressed that residents without off-street parking, families, lone women and those with limited mobility may face frustration or safety risks, and that small businesses could suffer from reduced customer access. The proposals are viewed as requiring clearer evidence of benefits, transparent revenue use and meaningful mitigation, such as maintaining dual-use flexibility, introducing limited-hour permit zones, prioritising blue badge holders, improving sustainable transport options including public transport, cycle routes and EV charging infrastructure, and focusing on road maintenance rather than further parking restrictions. Criticism that consultations are ineffective where objections have been ignored suggests that any reduction in parking should be supported by robust justification and accompanied by measures to balance resident, business and visitor requirements.

3.5.10 To what extent do you support or oppose our proposals to increase the charge for all day parking at our park and ride sites for motorists that do not use the park and ride bus service?

a) Alignment with the stated purpose of Park & Ride (118 respondents, 32%):

Respondents highlight that increasing the all-day parking charge for motorists who do not use the bus service may help prioritise spaces for intended park & ride users and deter misuse, thereby aligning with the objective of promoting sustainable travel and keeping cars out of the city centre. However, all-day parking at out-of-town sites, even without bus use, still contributes to reducing city-centre traffic and higher charges could discourage overall park & ride uptake, thereby undermining the purpose of offering a cost-effective alternative to driving into town. The proposal appears contradictory to the council's sustainable travel approach, with incentives rather than penalties suggested as a better means of achieving the park & ride's aim of easing urban congestion and pollution.

b) Impact on park-and-walk / park-and-cycle / car-share (sustainable multimodal users) (52 respondents, 14%):

Respondents argue that the proposed policy to raise the all-day parking charge at park-and-ride sites would unfairly penalise those who park and walk, cycle or car-share into Bath's city centre, behaviours which reduce congestion, cut emissions and support public health. Parking at park-and-ride sites to complete journeys on foot or by bike is described as fully consistent with sustainable travel aims and places no additional cost burden on the

council, so applying higher charges appears unjustified. Park-and-walk and park-and-cycle users are portrayed as active travel supporters who would be disincentivised by the higher fee, potentially shifting journeys back to private car use or inappropriate on-street parking. Liftshare and car-share commuters who meet at park-and-ride sites and travel onward in a single vehicle are seen as similarly sustainable users who would be unfairly targeted by the hike. The proposal is viewed as contradicting stated goals to encourage low-carbon and multimodal journeys, since walking, cycling or sharing a car after parking still reduces vehicle movements within the city centre.

c) **Need for alternative pricing, tiers or targeted measures** (39 respondents, 11%):

Respondents suggest a range of alternative pricing models, tiered structures and targeted measures to complement or replace the proposed increase in the up to 24-hour parking charge for motorists not using the bus service. The proposals could include short-stay free periods of 30 minutes to one hour for dog walkers, sports users and school coaches, mid-range tiers of five- or six-hour, 10–12-hour or multi-day rates with weekly caps, and steeper charges—potentially up to £10 for 24 hours or higher—specifically for long-term dwellers, campers or large vehicles. Exemptions or reduced fees could be offered for active travellers—bus riders, cyclists using ebikes or walkers—while season passes, loyalty or membership discounts might reward frequent use, and pre-paid multi-day tickets along with family or local resident concessions may improve flexibility. Linking parking fees to bus fares, RPI indexation or car park occupancy levels and exempting electric vehicle users while charging others could refine pricing, and partnerships with local businesses could provide broader incentives. Designating specific areas for non-short-stay parking, applying tourist levies or targeted enforcement may address misuse more directly than across-the-board hikes.

d) **Risk of displacement to residential streets or increased city-centre traffic** (26 respondents, 7%):

Respondents warn that increasing the all-day park and ride charge from £3 to £4 could encourage motorists to bypass the sites and drive into Bath in search of free or cheaper street parking, thereby displacing vehicles onto residential roads and adding to city-centre traffic and parking pressure. Displacing parking onto local streets would undermine sustainable transport objectives and burden communities with unrestricted parking while higher fees may shift rather than reduce demand, potentially increasing congestion and emissions. Low boundary charges are seen as essential to maintaining park and ride uptake and deterring vehicles from penetrating the city, and evidence on non-bus user parking patterns, site occupancy and potential traffic impacts is requested to ensure the proposal does not backfire by driving more cars into

Bath or neighbouring residential streets.

e) **Lack of evidence that non-bus parkers cause capacity problems** (24 respondents, 6%):

Respondents assert that evidence is lacking to show that long-stay motorists who do not board the park and ride bus service cause capacity problems at park and ride sites. Parking capacity at Lansdown, Newbridge and Odd Down P&R sites generally remains underutilised outside special events such as Christmas markets. Absence of published occupancy and modal data undermines justification for the proposed charge increase policy. Use of car parks by walkers, dog-walkers or cycle commuters may occur outside peak hours and appears not to displace bus passengers. Isolated instances of near-full occupancy do not demonstrate a systemic shortage, and higher all-day fees would primarily act as a revenue measure rather than shifting parking demand. Site-specific analysis of non-bus user volumes, parking durations and any operational impacts is required to establish whether increased charges would free up spaces for bus users.

f) **Affordability and disproportionate impact on low-income / essential workers** (19 respondents, 5%):

Respondents highlight that rising housing costs, energy bills, food prices, insurance premiums and other essential expenses, combined with wage growth lagging behind inflation, leave household budgets under strain and unable to absorb further local charge increases. Repeated charge rises could deter families, part-time workers, lower-income residents and regular visitors from using park and ride, which should provide an economical travel option. By contrast, any policy change may risk imposing undue financial hardship unless clearly demonstrated to be necessary, proportionate and effective. Affordability concerns extend to those working in Bath city centre, users of older vehicles and people who rely on parking close to the park and centre. Cumulative effects of higher parking permit fees, visitor permit costs, size-based vehicle surcharges and increased park and ride charges could disproportionately affect residents dependent on vehicles for work, caring responsibilities or daily travel. Increasing charges amid a shrinking number of council-controlled car parks and already high council tax may be seen as another attempt to extract money, effectively penalising low-income commuters, shift workers, cyclists and others whose travel patterns are poorly served by bus routes. A small daily increase may amount to a significant extra monthly cost for households whose wages have barely risen, undermining the role of park and ride in supporting local businesses and promoting sustainable travel without adding further financial burdens.

g) **Impact on visitors, tourism and local businesses** (19 respondents, 5%):

Respondents express concern that increasing all-day park and ride charges may discourage visitors to Bath and harm local businesses reliant on tourism. Park and ride should continue to support people visiting the city because that is good for business. Increasing the all-day charge may drive shoppers to out-of-town shopping with free parking. Any increase could confuse out-of-town visitors and deter families, lower-income residents and part-time workers. Repeated hikes may undermine Bath's appeal as a day-trip destination and create a disincentive for hotel and Airbnb guests to use the service. High street footfall could decline if visitors choose alternative shopping locations, potentially harming local traders. Park and ride pricing may need to remain affordable to support city-centre businesses and accommodate visitors from areas with limited public transport.

h) **Practicality and enforceability of distinguishing bus users** (19 respondents, 5%):

Respondents note that the council's policy to increase the all-day park and ride parking charge for motorists who do not use the bus service raises significant enforcement challenges. Enforcement mechanisms may be unclear as there is no physical link between parking and bus usage, making it difficult to verify whether a vehicle has boarded a service. Manual checks may prove costly and time-consuming and purchase of a bus ticket may not reliably link to a specific vehicle registration. Combined trips and varied travel patterns may be hard to classify fairly, while the absence of registration terminals on buses further complicates monitoring. Uncertainty about how non-use of the bus service would be proven may leave the policy unenforceable or financially unviable if enforcement costs outweigh additional revenue. Clear monitoring and enforcement arrangements would be needed to apply the higher charge consistently and to prevent motorists from avoiding payment, though mechanisms for doing so have not been specified.

i) **Problem of long-stay campers, caravans and persistent abuse** (10 respondents, 3%):

Respondents highlight that parking at park and ride sites is cheaper than campsites and argue for higher charges on camper vans, caravans and similar vehicles that stay for extended periods. Parking by non-bus users for multiple days may be undeterred by current rates and prolonged occupation of sites by caravans or camper vans could be tackled directly rather than through higher charges on standard motorists. Caravans and camper vans that remain for months could render sites overrun, as seen on the Downs in Bristol, and an increase in the all-day charge may be acceptable if it curbs long-term camping. Illegal parking by caravan-owning travellers is identified as causing the biggest parking problem, warranting targeted or tiered tariffs including a

24-hour rate of £10, a three-day rate of £25 and a week rate of £50, with further fees for overnight stays or large vans. Designated areas for long-term parking supported by specific costs and enforcement measures such as towing or clamping could address persistent abuse. However, doubts are raised over the policy's effectiveness in preventing travellers from occupying spaces for weeks without payment.

j) **Effects on EV users and local EV charging provision** (1 respondent, 0%):

The respondent argues that the proposed 33% increase in all-day parking charges at park and ride sites should be accompanied by significant expansion and upgrading of EV charging infrastructure at all three sites, and by exempting EV users from the higher rate or applying a reduced rate while actively charging. Increasing costs at the only locations providing charging may discourage EV adoption for residents without off-street parking. Until charging provision is adequate, penalising EV users would contradict both sustainability aims and fairness. The proposed £1 rise on the £3 all-day charge would disproportionately impact EV drivers who use park and ride sites to charge their vehicles rather than to avoid using the bus.

k) **Other** (235 respondents, 64%):

Respondents raised a variety of issues regarding the proposal to increase the all-day parking charge at park and ride sites for motorists who do not use the bus service. A call for detailed statistics and clear justification was made to explain the rationale and demonstrate measurable benefits, while concerns were expressed that the proposal could be perceived as a revenue-raising exercise rather than a genuine parking management measure. Better enforcement of existing payment rules and expansion of parking capacity were suggested as alternatives to raising charges, and clarification of charge application when using certain bus services was requested. Questions about equity highlighted that users who park to access green spaces, sports facilities, hospitals or to walk or cycle should not be unfairly penalised, and that residents ought not to face higher costs for legitimate trips. The adequacy, frequency and cost of connecting bus services were challenged, and it was suggested that improving public transport options or adding new park and ride sites might better address congestion and displacement to residential streets. While a modest fee increase was judged to reflect rising costs, an insistence was voiced that any increase should be supported by evidence of need, monitored through clear outcomes, and aligned with wider sustainability and traffic reduction objectives to avoid unintended consequences.

3.5.11 To what extent do you support or oppose our additional proposals concerning car parks at Bath Sports and Leisure Centre, Larkhall Square and the Holburne Museum?

a) **Affordability and cumulative impact of parking charge increases** (48 respondents, 25%):

Respondents express strong concern that the policy's proposed extension of daytime charging hours to start at 6am and increases to parking tariffs at Park and Ride sites would exacerbate existing affordability pressures and amount to cumulative cost burdens on residents. Parking charge rises are viewed as punitive and likely to deter use of sports, leisure and cultural facilities, penalising health-conscious and socially beneficial activities undertaken at off-peak times. Cumulative impacts of permit cost hikes, size-based vehicle surcharges and intensified charging periods may disproportionately affect households reliant on cars for work, caring responsibilities and daily travel amidst rising living expenses. Early-morning users of the leisure centre could find pre-work visits financially unviable, and the measures may be seen as primarily revenue-generating rather than addressing congestion or fairness. Calls for clear evidence that any additional parking costs would be necessary, proportionate and not unduly burdensome underline a prevailing view that no further charges should be imposed.

b) **Bath Sports & Leisure Centre — change to daytime charging start time (08:00 → 06:00)** (23 respondents, 12%):

Respondents are divided over the proposal to extend daytime parking charges at Bath Sports & Leisure Centre to start at 6am rather than 8am. Those in favour welcome aligning charges with early classes and avoiding payment for an overnight stay merely because their activity begins before 8am and regard the change as a sensible operational adjustment. However, concerns centre on the financial burden this would place on pre-work exercisers, swimmers and health-oriented or vulnerable users including lone women and those with caring responsibilities; the potential displacement of parking onto local streets; the lack of demand for spaces before 8am; and a perception that the measure is primarily revenue-driven rather than a fair parking reform.

c) **Larkhall Square — impact of parking changes on local businesses and village character** (9 respondents, 5%):

Respondents highlight that Larkhall Square is a valued local neighbourhood centre with a village-like atmosphere and a self-contained trading area served by independent shops, cafés and small businesses, and caution that introducing paid parking or additional restrictions could discourage short local visits, erode convenience and drive spending to larger retail destinations. The

sensitivity of small district centres to changes in parking accessibility is underlined by concerns that increased charges or complexity may severely affect local businesses, deter elderly residents and school-run parents, and undermine regular stops for exercise and shopping, while additional parking provision could support community spending and maintain the vibrancy of the local centre.

d) Holburne Museum — removal from the Traffic Regulation Order (TRO) (9 respondents, 5%):

Respondents support removal of the Holburne Museum from the Traffic Regulation Order on the grounds that it is no longer operated by the council. Removal from the TRO constitutes a necessary and purely administrative adjustment reflecting the site's private status. However, clarification may be needed on future operating hours, management arrangements and pricing under private control to ensure continued access and sensible charge levels. Continued inclusion in the TRO is argued to provide permit-holder convenience at present. Concern is expressed that removal could reduce access to the museum if private owners do not maintain current provisions.

e) Larkhall Square — removal of 4-hour overnight EV charging limit (9 respondents, 5%):

Respondents express contrasting opinions on removal of the 4-hour overnight EV charging limit at Larkhall Square. Removal of the 4-hour maximum stay for overnight charging is welcomed as it may enable drivers without off-street parking to charge overnight and align with net zero objectives and the council's EV transition aims. Concerns arise that absence of a time limit could allow vehicles to occupy points long after charging completes, reduce turnover and inconvenience users who need shorter charging sessions. Noise disturbance from charging activity at night may be problematic unless residents are consulted in advance. Equitable charging access may require complementary daytime charging provision for nightshift workers. Conversely, slow charging speeds at Larkhall could necessitate longer stays, making removal of the restriction practical. Opposition to lifting the limit also rests on the view that users should relocate once charging is finished to free bays for others.

f) Accessibility needs — disabled, elderly, carers and essential local trips (8 respondents, 4%):

Respondents emphasise that disabled visitors and tenants require parking close to their destinations to maintain access to local businesses. Disabled bays may require a verification mechanism to ensure spaces are used for museum attendance. Car parks at Larkhall may be essential for people

attending exercise classes and shopping, including elderly residents and carers. Parking provision could be reserved for bicycles and vehicles displaying blue badges. Individuals with reduced mobility or temporary injuries may rely on cars to transport heavy shopping. The policy could lose support if it imposes restrictions or omits concessions for disabled drivers. Car parks at the sports and leisure centre are necessary for parents using children's activities. Older residents may be unable to walk long distances, underscoring the need for additional parking. The proposed 6-8 am charge could disproportionately affect those with safety or caring responsibilities.

g) **Bath Sports & Leisure Centre — restrict parking to facility users / permit controls** (4 respondents, 2%):

Respondents support restricting the Bath Sports & Leisure Centre car park to facility users via a permit scheme that could be administered through a simple reception-based or digital check-in, noting that current unrestricted access lacks a coherent strategy. However, a permit-based approach may need to be straightforward to avoid creating barriers and should employ a practical ad hoc system similar to remote vehicle logging at leisure venues. Removal of general public access could appear to favour a privileged few, so discouraging non-centre users from parking may require careful design to maintain fairness.

h) **Parking enforcement and payment machine reliability** (2 respondents, 1%):

Respondents emphasise that any changes to the policy should be backed by effective enforcement so residents can see genuine benefits and that any increase in parking charges would need reliable ticket machines capable of accepting credit card payments.

i) **Safety concerns for early-morning parking users** (2 respondents, 1%):

Respondents warn that the proposed 06:00 start to charges at Bath Sports and Leisure Centre would adversely affect those who need to park near the facilities for safety or to fulfil caring responsibilities, including women, by compelling them to buy an overnight stay. Lone women may find it harder to access early-morning pool and gym facilities on dark winter mornings if parking is charged from 06:00. Introducing tariffs at this hour could deter use of the car park and discourage early-morning fitness activity.

j) **Park & Ride — increase in all-day parking fee for motorists not using the bus** (2 respondents, 1%):

Respondents express concern that the policy's cumulative effect of higher

parking permit charges, increased visitor permit costs, additional vehicle size-based charges and higher Park & Ride all-day parking fees for motorists not using the bus would disproportionately burden those reliant on their vehicles for work, caring responsibilities or daily travel and oppose raising the all-day parking charge at Bath Park & Ride sites.

k) **Digital authorisation / app-based payment clarification (no physical ticket required)** (1 respondent, 1%):

The respondent warns that requiring digital authorisation via an app for car park payment could risk age discrimination and may exclude users who cannot manage apps.

l) **Other** (143 respondents, 74%):

Respondents voice contrasting views on the additional proposals concerning car parks at Bath Sports and Leisure Centre, Larkhall Square and the Holburne Museum. Extending daytime charges to early morning hours is criticised as penalising users of the leisure centre, deterring families and early exercisers, and conflicting with public health objectives and active travel goals. By contrast, current parking arrangements are described as functioning adequately and in need of no change. Concerns are raised about consultation clarity, potential unfairness to residents reliant on cars and limited off-street parking, and lack of evidence of existing issues, alongside calls for any tariffs to align with venue opening times and for provision of more spaces or alternative transport options. Proposals to remove overnight limits for EV charging at Larkhall Square, clarify digital ticketing and exclude the Holburne Museum from the order are viewed as reasonable operational updates that may improve access, support EV use and reflect council control.

3.5.12 Thematic analysis of email responses

- a) Responses provided via email are included in the analysis shown within paragraphs 3.5.6 to 3.5.11.

4 Discussion of results

- 4.1.1 A comparison between the results of the Preliminary Consultation and this TRO Consultation demonstrates a high degree of consistency across all proposals that are included in both consultations. The TRO consultation largely validated the concerns, priorities and areas of support identified during the earlier engagement stage, with relatively few entirely new themes emerging. Whilst some proposals experienced modest shifts in support and opposition, the overall direction of opinion remained broadly unchanged. Across all topics, respondents placed greater emphasis on affordability, fairness, proportionality, accessibility and evidence-based decision making.

4.2 Discussion of qualitative feedback

- 4.2.1 Whilst the distribution shown across age groups (Figure 1) does not align to the 2024 mid-Year ONS data for Bath & North East Somerset, the lack of responses from the upper and lower age groups could be attributed to vehicle use, noting that most individuals in the under 17 group will be too young to hold a driving licence and those in the older groups (75+) may typically no longer choose to drive (with a driving license also requiring a 3 year renewal after the age of 70) and this will skew the response distribution. Department for Transport data also indicates that the age group 50-59, the highest responding group in this consultation, represents the highest proportion of driving licence holders in the UK with 86% of people in this age group holding a Full UK driving licence in 2024 (<https://www.gov.uk/government/statistical-data-sets/nts02-driving-licence-holders>). The distribution of respondents age matches the ranges shown for previous parking surveys.
- 4.2.2 The high number of public webpage views and responses received for this consultation indicate that a high level of public awareness of the issues being considered, with the distribution of geographical location of respondents (Figure 3) also demonstrating this.
- 4.2.3 Approximately 77% of responses, totalling 704, came from 15 wards where on-street parking is currently managed, or proposed to be managed, through resident parking schemes. Residents in these areas are therefore more directly affected by proposals that change permit charges. The council currently manages 32 separate schemes, covering around 18,612 residential properties.
- 4.2.4 Support for introducing size-based discounts or charges fell slightly, from 50% in the preliminary consultation to 47%, while opposition increased from 44% to 50%, as shown in Figure 4. Despite this modest shift, support remains

significantly higher than the approximately 25% typically seen in previous parking charge reviews.

- 4.2.5 In the case of size-based additional charges, it is a higher charge itself for larger vehicles that is the mechanism to encourage behaviour change amongst motorists to incentivise them to own smaller vehicles. The higher charge for these larger vehicles serves as a mechanism to encourage motorists to consider the impacts that their choice may have on other people, in particular vulnerable people, when purchasing a vehicle.
- 4.2.6 Consistent with the preliminary consultation, around two thirds of respondents who expressed a view opposed the proposed increase in visitor permit charges, with 533 of 909 respondents not in favour. A further 101 respondents, representing 11% of all responses, expressed no opinion.
- 4.2.7 Parking is an emotive subject for many people and when this sensitive topic is also aligned to increases in charges this is typically 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. However, the results for the size-based charges suggest strong backing for the proposed changes, particularly in relation to pedestrian safety, kerb space management, and improved vehicle movement. Further quantitative analysis is provided in section 4.3 of this report.
- 4.2.8 The council recognises the cost-of-living crisis and is sensitive to the current pressure on families. Whilst our size based additional charges mean higher charges only apply to larger vehicles, they nevertheless come at a sensitive time.
- 4.2.9 Any financial implications should be weighed against the risks that larger vehicles pose to public health and safety, as well as the operational need to prioritise residents' access to limited kerb space in residential areas. It is also essential to maintain network movement for public transport, emergency services, and delivery vehicles near homes.
- 4.2.10 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 and the Public Sector Equality Act 2023. Socio economic disadvantage is not a protected characteristic under the law but it is a local consideration that the council rightly considers alongside and as part of our statutory requirements.

4.3 Discussion of quantitative feedback

4.4 To what extent do you support or oppose our proposals to introduce an additional size-based charge or discount for residents permits?

- 4.4.1 The council notes the significant volume of feedback received in relation to the proposed introduction of an additional size-based charge or discount for resident parking permits. The themes raised by respondents included affordability, fairness, impacts on families, disabled people, carers and tradespeople, the availability of kerb space, the evidence base for the proposal, the way vehicle size would be measured, interaction with existing emissions-based charges, enforcement, administration, and concerns that the proposal may be perceived as revenue raising. These themes broadly align with those identified during the preliminary consultation, although the statutory TRO consultation generated a greater number of responses and provided further detail on the practical concerns held by residents.
- 4.4.2 The quantitative response to this proposal shows a relatively balanced position, with 47% of respondents supportive and 49% not supportive. This differs slightly from the preliminary consultation, where 50% of respondents were supportive and 44% were not in support, but still demonstrates that this proposal continues to receive a higher level of support than is usually seen in consultations involving new or increased parking charges.
- 4.4.3 The council recognises that parking charges are an emotive issue, particularly where they apply to residents who may have limited or no access to off-street parking. The council also recognises the current cost-of-living pressures affecting households and accepts that any additional charge, even where modest, may be unwelcome. However, the purpose of this proposal is not simply to increase permit charges, but to better reflect the impact that larger vehicles have on limited kerb space, pedestrian safety, visibility, access for public transport, emergency services and delivery vehicles, particularly on Bath's narrower residential streets.
- 4.4.4 The public highway is a finite resource which must be managed in the interests of all users.
- 4.4.5 The proposal has been developed in accordance with the council's duties under section 122 of the Road Traffic Regulation Act 1984 and section 16 of the Traffic Management Act 2004. These duties require the council to consider the expeditious, convenient and safe movement of vehicles and other traffic, including pedestrians, and to manage the road network effectively. The Statement of Reasons also confirms that the proposal supports local transport policy, Liveable Neighbourhoods and Journey to Net Zero objectives, while making more efficient use of limited on-street parking space.

- 4.4.6 A number of respondents questioned whether there is sufficient evidence to justify the proposal. The council acknowledges this concern, particularly requests for local collision data and zone-specific parking evidence. However, the proposal is not intended to respond only to collision hotspots. It is intended to address wider and known risks associated with the increasing size of vehicles, including reduced visibility, greater injury severity in collisions involving vulnerable road users, and the increased amount of public highway space occupied by larger vehicles. The evidence base considered by the council includes wider research showing that vehicle dimensions have increased over a sustained period and that larger vehicles present increased risks for vulnerable road users and urban space.
- 4.4.7 Recent research from Transport & Environment and Clean Cities identifies that the average size of newly sold cars continues to increase, with average length rising by 1.2cm per year and height by 0.5cm per year. It also notes that wider and longer vehicles occupy more public space, with potential impacts on the number of vehicles that can be accommodated in end-to-end on-street parking. The report also identifies increased risks to vulnerable road users arising from larger vehicles and higher bonnet heights. While this research is not specific to Bath, it supports the broader evidence that increasing vehicle size has implications for road safety, public space and parking availability.
- 4.4.8 Respondents also raised concerns that the proposal may unfairly affect families, disabled people, carers and households that need a larger vehicle for practical reasons. The council accepts that households choose vehicles for a wide range of legitimate reasons, including family size, work requirements, mobility needs and caring responsibilities. The proposal does not prevent residents from owning or parking larger vehicles, nor does it mandate a vehicle change. Instead, it introduces a proportionate price signal intended to encourage consideration of smaller vehicles where this is practical, particularly when a vehicle is next replaced.
- 4.4.9 The proposal will apply only when permits are renewed and does not require residents to replace existing vehicles.
- 4.4.10 The council has also considered equality impacts and does not consider that the proposal unlawfully discriminates against any protected characteristic. Equality impacts have been assessed through the EqlA process and appropriate mitigations identified where required.
- 4.4.11 Blue Badge holders living in a resident parking zone are entitled to a resident parking permit free of charge and are therefore not directly affected by the size-based permit charge. Blue Badge holders, upon display of their badge, can also park in resident permit bays and paid-for on-street parking bays for as long as needed, and on single or double yellow lines for up to three hours

where no loading restriction applies. The EqIA process has considered potential impacts on disabled people, carers, older people, people with lower incomes and those experiencing digital exclusion, and identifies existing support routes including telephone, in-person and online support.

- 4.4.12 Some respondents argued that the proposal could be regressive or may place greater pressure on those with lower incomes who are less able to replace a vehicle. The council recognises this concern and has considered socio-economic disadvantage as a local consideration, even though it is not a protected characteristic under the Equality Act 2010. At the same time, the council must balance individual financial impacts against the wider public interest in maintaining safe, accessible and efficient streets, particularly in areas where kerb space is limited and larger vehicles can reduce access for other residents, pedestrians, cyclists, buses, waste vehicles, emergency services and deliveries.
- 4.4.13 Concerns were raised about disabled people and families who may need larger vehicles, including vehicles used to carry wheelchairs, mobility equipment, child seats or other essential equipment. The council acknowledges that some residents will have limited practical choice over vehicle size. However, the scheme includes important mitigations for residents who qualify for a Blue Badge, including free resident permits. The council will continue to consider evidence provided by respondents and will keep the operation of the scheme under review, particularly where future evidence indicates that further clarification or mitigation may be required.
- 4.4.14 Several respondents argued that the proposal should distinguish between private vehicles, family vehicles, tradespeople's vehicles, vans and commercial vehicles. The council recognises that vans and larger vehicles may be required for work purposes. However, the impact on safety and limited on-street kerb space is still related to the physical size of the vehicle, regardless of the reason it is owned. The council therefore considers that a size-based approach remains relevant to the traffic management and street-space objectives of the proposal. Where professional or trade visits are required to residential properties within scheme areas, the council already provides trade permits, medical permits and social care permits for use in resident parking zones, and these are separate from resident permits and these proposals. These proposals do not impact vehicles that are only stopping to facilitate loading and unloading at the kerbside
- 4.4.15 Respondents raised questions about the interaction between size-based charging and existing emissions-based permit charges, particularly for electric vehicles. The council acknowledges that emissions and vehicle size are separate issues. Emissions-based charging is intended to address pedestrian safety via improved air quality and encourage less polluting vehicles, whereas size-based charging is intended to address vehicle footprint, kerb space,

visibility, movement and pedestrian safety. A low-emission vehicle will continue to benefit from lower emissions-based charges when compared with a more polluting vehicle of similar size. However, where a low-emission or zero-emission vehicle is significantly larger, it may still have a greater impact on pedestrian safety in the event of a collision and on kerb space and street movement than a smaller vehicle.

- 4.4.16 Some respondents suggested that weight should be used instead of area. The council acknowledges that vehicle weight can be relevant to road wear and that some authorities have considered or introduced weight-based approaches. However, weight would not directly address the amount of kerb space occupied by a vehicle and could disproportionately affect electric vehicles, which are often heavier because of battery weight. A size-based approach is therefore considered more directly linked to the proposal's objectives of managing kerb space, reducing obstruction and encouraging more efficient use of limited residential street space. Weight-based options may remain a matter for future review if evidence or policy development supports that approach.
- 4.4.17 A number of respondents questioned the proposed measurement method, including whether the charge should be based on length only, width only, area, height, or whether wing mirrors should be included. The council acknowledges that different vehicle dimensions affect the highway in different ways. Length has a clear relationship with kerb-space occupation, while width can affect the ability of other vehicles, cycles, buses, emergency vehicles and delivery vehicles to pass safely and conveniently. Area therefore remains a reasonable proxy for the overall footprint and street-space impact of a vehicle.
- 4.4.18 The council also acknowledges earlier consultation material referred to DVLA data being used to determine length and width. The council has since clarified that the DVLA does not hold all the information required to calculate vehicle size for this proposal. The data source used will therefore be declared within the On Street Parking Permit Terms and Conditions, with manufacturer-supplied data currently identified as the relevant source. This approach is intended to provide transparency to customers while allowing the council to update the data source if needed.
- 4.4.19 Respondents also expressed concern about administrative complexity, data accuracy and how vehicle changes would be managed. The council recognises that any new charging structure needs to be clear, transparent and capable of being administered consistently. The permit system will calculate any additional charge or discount automatically using the declared vehicle data source, meaning customers will receive a personalised charge for their vehicle. Where vehicle size data is missing, the council may accept photographic or documentary evidence showing vehicle dimensions; if any evidence supplied is not acceptable or not available, the maximum charge

may apply.

- 4.4.20 Concerns were also raised that the proposal could lead to displacement, pavement parking or increased pressure in nearby streets. The council acknowledges that changes to parking charges can affect behaviour. However, parking in resident parking schemes is already regulated, and the council has powers to enforce contraventions where vehicles are parked in breach of existing restrictions. Where pavement parking occurs alongside an existing restriction, the council can enforce that restriction; where no restriction exists, obstruction remains a matter for the Police. Requests to amend resident parking scheme boundaries, or to address localised parking pressure in specific streets, are outside the scope of this consultation and should be progressed through the council's Residents Parking Scheme strategy and local councillors. The council is awaiting further changes from the Government later in 2026 following the recent publication of the outcomes from its Pavement Parking consultation in 2020.
- 4.4.21 Several respondents stated that enforcement should be improved before new or increased charges are introduced. The council accepts that visible and effective enforcement is important to public confidence. Officer resources are finite and must be deployed according to demand, intelligence and operational priorities. The council values information from local communities and uses this to support proactive deployment where specific issues are identified. Ensuring that resident parking schemes remain financially sustainable also supports the continued administration, maintenance and enforcement of those schemes.
- 4.4.22 Respondents also raised concerns that the proposal is primarily revenue raising. The council notes that parking permit charges cannot be introduced for the purpose, whether primarily or secondarily, of raising revenue. The Statement of Reasons confirms that these proposals are the measure by which the council seeks to address pedestrian safety, traffic management and network management considerations. Any surplus generated from on-street charges must be used only for purposes permitted under section 55(4) of the Road Traffic Regulation Act 1984 and will be allocated in accordance with those statutory obligations.
- 4.4.23 The council accepts that additional income may be generated where some motorists choose to continue owning and parking larger vehicles. However, the intended purpose of the proposal remains behaviour change, improved use of limited kerb space, improved access, and safer movement of pedestrians and other road users. The council has also committed to improving transparency in relation to resident parking scheme income and costs within future parking account reporting.
- 4.4.24 Some respondents suggested that instead of charging by vehicle size, the council should focus on alternative or complementary measures such as

stronger enforcement, marked bays, limits on multiple permits, improved public transport, active travel, EV charging, or more localised restrictions. The council recognises that parking charges are only one part of a wider transport and street management approach. The proposal sits alongside wider council policies and programmes including the Active Travel Masterplan, Journey to Net Zero, Liveable Neighbourhoods, the Movement Strategy for Bath and investment in public EV charging infrastructure.

- 4.4.25 The council does not generally mark individual bays within longer on-street parking places because doing so can reduce overall parking capacity by limiting the flexibility for vehicles of different lengths to park efficiently. While marked bays may be appropriate in some locations, they are not considered a general alternative to a size-based charge where the objective is to influence the overall mix and footprint of vehicles using limited on-street space.
- 4.4.26 The council also notes concerns that the charge may not be strong enough to influence behaviour. The purpose of the proposal is to introduce a proportionate signal and not to force residents to give up existing vehicles. Vehicle purchase is a major financial decision and the council does not expect all households to change vehicles immediately. The measure is intended to influence future choices over time, particularly when residents next replace a vehicle, and to encourage consideration of smaller, safer and more space-efficient vehicles where practical.
- 4.4.27 It's often commented that modern vehicles have become larger because of safety regulations; EV batteries; and manufacturer choices rather than consumer preference (noting that the availability of options in a marketplace are often driven themselves by consumer demand in line with principle of supply and demand. The reasons for vehicle growth does not change the impact on pedestrian safety, limited kerb space, and highway operation. The council's concern is the effect of vehicle size, not why the vehicle is larger.
- 4.4.28 Whilst views were mixed, the council notes that support for the proposal remained substantial and that there was no clear consensus that the proposal should not proceed given the outcome that the proposal aims to support.
- 4.4.29 Taking account of the consultation feedback, the council considers that the proposal remains justified and proportionate. It supports the efficient use of limited kerb space, the safer movement of pedestrians and cyclists, and improved access for public transport, emergency services, waste collection and deliveries. It also complements existing emissions-based parking charges by addressing a different but related issue: the physical space occupied by vehicles on residential streets.
- 4.4.30 Having considered the points raised by respondents, the council does not consider that the consultation feedback requires the proposal to be withdrawn.

However, the council recognises the need for clear implementation, transparent data sources and ongoing monitoring. The proposal should therefore proceed with the previously identified amendment that the vehicle data source used to calculate vehicle size is declared within the On Street Parking Permit Terms and Conditions, and that any future change to that data source is managed transparently through the relevant terms and conditions process.

4.5 To what extent do you support or oppose our proposals to increase the charge for visitor parking permits?

- 4.5.1 The proposal to increase the charge for visitor parking permits was not supported by a majority of respondents. The council recognises that visitor permits are important for residents, particularly where family, friends, informal carers or other visitors need to park close to someone's home.
- 4.5.2 The council also recognises that any increase in parking charges comes at a sensitive time, particularly while household costs remain under pressure. However, visitor permit charges have historically remained low and the proposed increase is intended to help ensure that Resident Parking Schemes remain financially sustainable, with their administration, maintenance and enforcement costs met by those who benefit from the schemes rather than by wider council budgets.
- 4.5.3 A number of respondents commented on the cumulative effect of several proposed parking charge changes. The council recognises that residents experience parking charges collectively rather than as individual proposals. However, each proposal has been developed to address a specific policy or financial objective and has been subject to separate assessment through the consultation and equality impact assessment process.
- 4.5.4 The proposed increase is being phased over three years. Whilst this represents a significant percentage increase from the current charge, the equivalent daily charge would rise from £1 to £1.50 in 2026, £2 in 2027 and £2.50 in 2028. Visitor permits already purchased would remain valid for 12 months from the date of purchase and would not be affected by any later price change.
- 4.5.5 A number of respondents felt that the increase was disproportionate and should instead be linked to inflation. The council acknowledges this concern. However, the current charge has not kept pace with the cost of administering, maintaining and enforcing Resident Parking Schemes. The proposed increase is therefore intended to respond to those actual service pressures and support the principle that these schemes should be self-financing.

- 4.5.6 Several respondents asked for greater transparency on how permit income is used. The council publishes its parking account annually and is committed to improving the detail provided in future reporting so that residents can better understand the relationship between permit income, scheme administration, maintenance and enforcement.
- 4.5.7 Concerns were also raised about the impact on carers, health visitors, tradespeople and residents who rely on regular support at home. Visitor permits are intended for personal visits, such as friends and family visiting residents. The council provides separate medical, social care and trade permits for professional or essential visits to properties within residents' parking zones. These permit types are not affected by the proposed visitor permit increase. The council has already taken steps to improve information provided to residents when they purchase visitor permits and will continue to review how awareness of these alternatives can be improved.
- 4.5.8 The council also recognises the concerns raised by older residents, disabled people, people on lower incomes and those who may be at risk of social isolation if visits become more expensive. The potential impacts on older people, disabled people, carers and those on lower incomes have been considered through the Equality Impact Assessment accompanying these proposals.
- 4.5.9 Blue Badge holders can park without charge in resident permit bays and paid-for on-street parking bays, provided a valid badge is displayed. Residents who live in a permit zone and hold a Blue Badge are also entitled to a resident parking permit free of charge. Paper visitor permits remain available where appropriate, including as a reasonable adjustment, and customers can receive support by telephone or in person where they cannot access digital services.
- 4.5.10 The council acknowledges concerns that increased visitor permit charges could discourage visits from family and friends, particularly for older or more vulnerable residents. Maintaining social connections is important and this concern has been considered as part of the Equality Impact Assessment. However, the council considers that the phased nature of the increase and the continued availability of visitor permits means the proposal remains proportionate. Unrestricted or free limited waiting parking is also typically available in many scheme areas.
- 4.5.11 Some respondents suggested that visitor permits should be available in smaller bundles or should not expire after 12 months. The council understands that some residents may not use their full allocation within a year, particularly where visits are occasional or irregular. However, the expiry period helps to prevent the accumulation, resale or misuse of visitor permits, which could undermine the purpose of residents' parking schemes and

increase pressure on limited kerb space. Residents are encouraged to purchase visitor permits in smaller quantities where possible, rather than purchasing the maximum allocation in advance, with the minimum bundles available set at a level which balances a low purchase price against administration costs.

4.5.12 Feedback also highlighted frustration where activated digital permits are not fully used, for example when a visitor leaves earlier than expected. The council recognises the benefit of allowing account holders to manage unused activated time themselves and will explore whether this can be made easier through the permit system. Any change would need to remain secure and avoid increasing opportunities for misuse.

4.5.13 Some respondents felt that increasing visitor permit charges could harm local businesses, tourism or the local economy by discouraging visits. The council recognises that visitors support local communities and businesses. However, visitor permits are specifically intended to support visits to residents in controlled parking zones, rather than to provide general visitor parking for shopping, commuting or tourism. The council also provides a wider parking offer, including paid-for on-street parking, car parks and Park and Ride services, to support access to Bath and other local centres.

4.5.14 Concerns were raised that higher prices could encourage non-compliance, displacement to unrestricted streets or pavement parking. The council will continue to enforce residents' parking zones in line with available resources and local demand. Where specific issues are reported by residents, this local intelligence helps officers target enforcement activity. Pavement parking can already be addressed where it occurs alongside an existing highway restriction, although wider legal powers remain limited and are subject to national policy.

4.5.15 A number of respondents felt that misuse of visitor permits by holiday lets, HMOs, commuters or commercial users should be dealt with before prices are increased. The council recognises concerns about misuse of visitor permits by holiday accommodation providers, commuter parking and other unauthorised users. Permit conditions clearly set out the circumstances in which visitor permits may be used and enforcement action may be taken where misuse is identified. The council implements proportionate checks to confirm eligibility for permit accounts, balanced against the benefit of allowing residents to self-serve and access permits when needed. The council will continue to review permit management processes and compliance activity as resources allow.

4.5.16 Some respondents suggested that the charge should vary by vehicle size, visitor type, frequency of use or local parking pressure. The council acknowledges that more targeted pricing may have advantages in principle. However, more complex charging structures would be harder for residents to

understand, more difficult to administer and may increase the cost of operating the scheme. A simple phased increase is considered a more practical and proportionate approach at this stage.

4.5.17 Several respondents compared permit charges with neighbouring authorities and considered the existing charge to be comparatively high. The council notes that permit schemes vary significantly between authorities in terms of the level of enforcement provided, operating costs, scheme size and the range of concessions offered. Direct comparison between authorities can therefore be difficult. The council's focus is on ensuring that permit charges remain proportionate and sufficient to support the administration, maintenance and enforcement of Resident Parking Schemes locally.

4.5.18 A number of respondents commented on the cumulative effect of several proposed parking charge changes. The council recognises that residents experience parking charges collectively rather than as individual proposals. However, each proposal has been developed to address a specific policy or financial objective and has been subject to separate assessment through the consultation and equality impact assessment process.

4.5.19 Several respondents suggested increasing permit allocations if charges are increased. Permit allocation limits are intended to balance resident demand with the finite amount of kerbside space available within parking zones. Increasing allocations without increasing available parking capacity may reduce the effectiveness of the schemes.

4.5.20 The council has considered the issues raised through the consultation, including affordability, access for essential visitors, permit flexibility, enforcement, misuse and transparency. Having balanced these matters against the need to maintain effective and financially sustainable residents' parking schemes, it is recommended that the proposal to increase visitor parking permit charges is progressed as advertised. The council will continue to review customer information, reporting transparency and system functionality to help residents understand and manage their visitor permit use.

4.6 To what extent do you support or oppose our proposals to increase the charge for all day parking at our park and ride sites for motorists that do not use the park and ride bus service?

4.6.1 The response to this proposal was finely balanced, with 41% of respondents supporting the proposed change, 38% opposing it and 21% expressing no opinion. This is broadly consistent with the earlier preliminary consultation, where support and opposition were also closely matched.

- 4.6.2 The primary purpose of the Park and Ride sites is to provide parking capacity that supports the Park and Ride bus service. This helps regular and occasional visitors enter Bath more sustainably, supports reliable public transport access into the city, and helps reduce congestion and pollution on the wider road network.
- 4.6.3 The council recognises that the attractiveness of the Park and Ride network depends on the reliability and convenience of the bus service. Improvements to public transport remain an important objective. However, the effectiveness of the Park and Ride network also relies on preserving parking capacity for bus passengers and supporting the financial sustainability of the service. These objectives are complementary rather than mutually exclusive.
- 4.6.4 The proposal is not intended to discourage use of the Park and Ride sites by those using the bus service. Bus users will continue to park free of charge, and the existing short-stay parking charge will remain unchanged. The proposal only increases the longer “up to 24-hour” parking charge for motorists who do not use the Park and Ride bus service.
- 4.6.5 Some respondents felt that people who park and then walk, cycle or car share are still making sustainable travel choices and should not be penalised. The council recognises that walking, cycling and car sharing can reduce vehicle movements into the city centre and can support wider health and sustainability aims. However, the Park and Ride sites are provided primarily to support the bus service. Long-stay use of these sites by motorists who do not use the bus service can reduce the availability of spaces for bus passengers and may weaken the long-term viability of the service, particularly at peak times when passenger income helps support the service.
- 4.6.6 The council also recognises the health benefits of allowing some wider use of Park and Ride sites, such as walking or sports activity. For that reason, the existing tiered tariff has been retained and the “up to 3 hours” charge is not proposed to increase. This means shorter visits, including users of Lansdown Park and Ride for walking or sports, will not be affected by this proposal.
- 4.6.7 Several respondents were concerned that increasing the all-day charge could displace motorists into nearby residential streets or encourage more people to drive into the city centre. The council accepts that displacement is an important consideration in any parking proposal. However, the all-day Park and Ride charge will remain significantly lower than all-day parking in city centre car parks, and much of the on-street parking close to the centre is already regulated through Residents Parking Schemes or paid-for parking. On that basis, the proposal is not expected to create a significant shift towards city centre or residential on-street parking.

- 4.6.8 The Statement of Reasons sets out that the proposal supports the council's network management duty by helping to protect limited Park and Ride capacity for those wishing to access the city centre by bus, particularly at peak times. This supports the reduction of visitor traffic into the city centre and helps maintain the flow of traffic, including public transport and emergency vehicles.
- 4.6.9 The proposal also ensures that motorists who use Park and Ride sites for all-day parking without using the bus service contribute towards the maintenance and operation of the sites.
- 4.6.10 Some respondents questioned whether there is sufficient evidence that non-bus users cause capacity pressures at Park and Ride sites. The council notes that demand can vary by site, day and season, and that occasional peaks can occur even where average use suggests spare capacity. The purpose of the proposal is therefore preventative as well as operational: to help maintain capacity for the intended Park and Ride function and to ensure that those parking all day without using the bus service make a fairer contribution to site maintenance and operation.
- 4.6.11 Bath continues to face significant transport pressures. The Movement Strategy identifies the need to improve travel choices, reduce vehicle traffic volumes and create better quality places, with transport accounting for 36% of greenhouse gas emissions in the B&NES area. Park and Ride is one of the key tools available to support this approach by intercepting journeys before they reach the constrained city centre.
- 4.6.12 Respondents also raised concerns about affordability, particularly for workers, lower-income users and visitors. The council recognises that any increase in parking charges comes at a sensitive time. However, the proposed increase is limited to £1 for the all-day non-bus-user tariff, while the short-stay charge remains unchanged and bus users continue to park free of charge. Park and Ride bus fares also include a range of discounts, including multi-journey tickets, group tickets, free travel for English National Concessionary Pass holders after 09:00 on weekdays, and free travel for up to five children with each fare-paying adult.
- 4.6.13 The council has also extended the Park and Ride bus service until August 2027, with services operating until 23:30 Monday to Saturday. This supports local businesses, improves the visitor experience, and provides greater convenience for workers and tourists who need to travel later in the evening.
- 4.6.14 Some respondents suggested that improving bus reliability, frequency and affordability would be a better way to increase bus use than raising parking charges. The council recognises that public transport improvements are important, but also notes that increasing bus frequency on an already

congested network can increase operating costs and undermine service viability if additional passenger income is not generated. Work is also taking place at a West of England level to consider bus reform options, including franchising, to provide a stronger evidence base for future decision making.

4.6.15 The council is currently exploring cost-effective options to improve the Park and Ride customer experience, align parking and/or bus payment channels, and support more effective enforcement of Park and Ride sites. Work is ongoing to explore options that align parking and transport payment channels and support more effective enforcement.

4.6.16 Some respondents suggested more complex tariff structures, including peak-only charging, weekly caps, exemptions for active travellers, EV discounts, multi-day tickets or different rates for specific user groups. The council recognises that more flexible tariffs can appear attractive, but parking charges must be set through Traffic Regulation Order processes, which require consultation and significant officer resource. A consistent tariff is simpler for customers to understand, easier to administer, and more reliable during irregular spikes in demand.

4.6.17 Customers who park at Park and Ride sites for more than one day must currently activate parking separately for each day. This helps keep the payment process flexible, as unused days can be cancelled without charge if plans change.

4.6.18 Respondents also raised concerns about campers, caravans and longer-term unauthorised occupation of Park and Ride sites. The council's current approach to unauthorised encampments balances the needs of the local community with the rights and dignity of people living in vehicles. Where environmental, safety or community issues arise, cases are assessed individually on a risk basis and action is taken according to need and available resources. The council has recently undertaken action to engage with those camping at these sites and issued invitations to leave which have now been complied with and is exploring additional signage to help prevent future issues.

4.6.19 Some respondents suggested that increasing the capacity of Park and Ride sites would be preferable to increasing all-day charges. The council notes that creating additional facilities to the required standard would require significant capital investment, and higher parking charges at these more remote sites may be needed to offset those costs.

4.6.20 Accessibility was also raised through the consultation. 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.

4.6.21 Blue Badge holders can park for no charge on single or double yellow lines for up to three hours where permitted, in resident permit bays and paid-for on-street parking bays, and free parking for Blue Badge holders is available in Charlotte Street car park and in dedicated time-limited disabled parking bays across Bath city centre. People of qualifying age, or who have certain disabilities, can also obtain a free Diamond Travelcard for local bus travel or discounted travel on community transport schemes.

4.6.22 Several respondents suggested concessions for specific user groups. While the council recognises the potential benefits of targeted concessions, introducing multiple user-specific charging arrangements would increase administrative complexity and enforcement requirements. The proposal seeks to maintain a simple and transparent charging structure that can be consistently applied across all Park and Ride sites.

4.6.23 While utilisation varies by site, time and season, the council must ensure that sufficient capacity remains available for the primary purpose of supporting Park and Ride bus users, including during periods of higher demand and special events, whilst ensuring that capacity for Park and Ride bus users is typically available throughout the year.

4.6.24 The council acknowledges concerns that parking charges can be perceived as revenue raising. However, the purpose of this proposal is to support the effective operation of Park and Ride sites by discouraging all-day non-bus use where it may affect capacity for bus users, and by ensuring all-day site users contribute to the maintenance of the sites and the service.

4.6.25 The council recognises that views on this proposal are closely divided. Respondents raised legitimate concerns regarding affordability, enforcement, flexibility of use and the role of Park and Ride sites in supporting walking, cycling and other activities. Equally, there was strong support for protecting capacity for bus users, preserving the long-term viability of the Park and Ride service and supporting wider transport objectives. Having considered these competing factors, the council remains satisfied that a modest increase in the all-day charge for motorists who do not use the bus service is proportionate and consistent with the intended purpose of the Park and Ride network.

4.7 To what extent do you support or oppose our proposals to introduce parking charges on Weston Road, Bath

4.7.1 The council recognises that this proposal generated mixed feedback. A significant number of respondents valued Weston Road as one of the remaining free on-street parking areas close to the city centre and Royal Victoria Park. Some respondents felt that retaining a free period was

important for short visits, local businesses, recreational use of the park, and people who may find walking longer distances difficult. The proposal already retains a free parking period of up to one hour, which provides a balance between preserving short-stay access and discouraging unrestricted long-stay parking.

- 4.7.2 Some respondents argued that a longer free period, such as two or three hours, would better support park users, allotment holders, residents and visitors making short trips into Bath. The council notes these comments, however, the purpose of this proposal is to encourage turnover in an area where unrestricted kerb space can currently be used for long-stay parking. A longer free period would reduce the effectiveness of the proposal in encouraging turnover and could continue to allow the same parking patterns that the proposal is intended to manage. By discouraging all-day parking, the proposal is intended to improve availability of parking spaces for short-stay visitors and people needing access to nearby facilities.
- 4.7.3 A recurring concern was that introducing charges on Weston Road could displace vehicles into nearby unrestricted residential streets, particularly Cranwells Park. The council recognises this as a genuine concern where unrestricted parking remains available nearby. However, requests to amend existing residents' parking scheme boundaries or introduce new permit controls in adjoining streets are outside the scope of this specific TRO consultation. These requests should continue to be considered through the council's established residents' parking scheme process, normally led by local councillors and informed by local evidence. It is also noted that no-waiting-at-any-time restrictions are widely distributed through the Cranwells Park area to prevent inconsiderate parking affecting vehicle movement. In addition, the presence of off-street parking for all properties in this area should help minimise any impact on residents' own parking needs if displacement occurs.
- 4.7.4 The council will continue to review local parking issues through its normal Traffic Regulation Order and residents' parking scheme processes. Where communities identify clear and persistent parking problems, including displacement following changes elsewhere, those concerns can be raised through local ward members for consideration in line with the Residents Parking Scheme strategy. This approach allows localised issues to be considered on their own merits, rather than widening the scope of this proposal beyond the specific section of Weston Road under consultation.
- 4.7.5 Several respondents felt that the proposal was mainly intended to raise revenue. The council acknowledges that parking charges are often viewed in this way, particularly where a previously unrestricted location becomes chargeable. However, the purpose of this proposal is to manage kerb space, encourage turnover, and reduce long-stay commuter parking in a location that is close to the city centre and Royal Victoria Park. The Statement of Reasons

explains that parking charges are proposed at unrestricted highway locations currently used by commuters, with the aim of discouraging less sustainable travel choices and ensuring local communities can continue to access this parking through improved turnover.

- 4.7.6 It is accepted that income may be generated from the proposal. Any surplus raised from on-street parking charges must be applied for a purpose specified in section 55(4) of the Road Traffic Regulation Act 1984 and allocated in line with statutory obligations. The council has also previously recognised feedback requesting clearer reporting on parking income and costs, and has committed to improving the detail provided in future parking account reporting where appropriate.
- 4.7.7 Some respondents questioned whether the evidence base justified the change and asked for clearer demonstration of parking stress, misuse, congestion, obstruction, air quality impacts or displacement effects. The council notes this concern. The proposal should be considered within the wider policy context for transport in Bath, where the council is seeking to improve travel choices, reduce vehicle traffic volumes and manage the use of constrained street space more effectively. The adopted Movement Strategy for Bath Main sets out policies to create better places, improve travel choices, and reduce vehicle traffic volumes, while recognising that personal car travel will remain important for some people.
- 4.7.8 The Movement Strategy evidence base also identifies high car use for trips to, from and through Bath, alongside congestion, bus punctuality and the need to reduce car kilometres as part of the council's wider transport aims. The proposal for Weston Road is therefore one part of a broader approach to managing demand, encouraging more sustainable travel choices where practical, and making more efficient use of highway space.
- 4.7.9 Affordability was also raised by respondents, including concerns about low-income households, workers, hospital visitors and people who own older or higher-emission vehicles. The council recognises the cost-of-living pressures faced by many households and has considered these matters through the Equality Impact Assessment. The assessment notes that one hour of free parking remains on Weston Road, that Blue Badge holders may use on-street pay and display bays for free, and that assistance remains available for customers who need help using payment systems.
- 4.7.10 The council also recognises that some people will continue to need to travel by car, including some disabled people, older people, carers, workers and people making essential journeys. The Movement Strategy expressly recognises that personal car travel will be critical for some people's day-to-day needs and that the transport system must remain accessible and inclusive. These wider considerations support the need for a balanced

approach, rather than removing access entirely. In this case, the proposal retains short-stay free parking while introducing charges for longer stays.

- 4.7.11 Respondents also raised concerns about the impact on Royal United Hospital staff and visitors, noting that some may currently use Weston Road for long-stay parking. The council acknowledges these comments, but unrestricted highway parking is not intended to provide dedicated staff parking for any particular organisation. The proposed introduction of charges would encourage longer-stay users to consider alternative options, including formal parking provision, public transport, Park and Ride, or other travel choices where these are available and practical.
- 4.7.12 Some respondents felt that the proposal could harm local businesses and reduce town centre footfall by removing a free parking option. The council recognises the importance of supporting local businesses and the visitor economy. However, the proposal does not remove all parking from Weston Road; rather, it introduces managed parking with a free short-stay period. This can support turnover, helping more people access the spaces during the day rather than allowing them to be occupied for long periods by a smaller number of vehicles.
- 4.7.13 The wider Movement Strategy also notes that improving walking, wheeling and cycling conditions can support local economies and that Bath's visitor economy is important to the area. Managing parking more effectively should therefore be considered alongside the council's wider work to improve access, public realm and sustainable travel choices, rather than as a standalone measure intended to reduce visits.
- 4.7.14 A number of respondents asked for better alternatives before charges are introduced, including improved buses, better Park and Ride services, and more accessible transport options. The council agrees that parking policy should sit alongside wider transport improvements. The Movement Strategy sets out a long-term framework to improve travel choices, including walking, wheeling, cycling and public transport, while recognising accessibility barriers and the needs of essential car users. The council has also extended the Park and Ride bus service until August 2027, with services operating until 23:30 Monday to Saturday. This supports local businesses, improves the visitor experience, and provides greater convenience for workers and tourists who need to travel later in the evening.
- 4.7.15 The council is also taking account of wider evidence on vehicle size, kerb space and safety. Recent research from Transport & Environment and Clean Cities identifies that new cars continue to grow in length, height, width and bonnet height, and that larger cars occupy more public space, increasing pressure on on-street parking. While this proposal is based on emissions-

based charges rather than vehicle size, the wider evidence supports the need to manage scarce kerbside space carefully in constrained urban areas.

4.7.16 Concerns were also raised about enforcement and implementation. The council recognises that any new parking controls need to be clear, practical and enforceable. The charge structure proposed for Weston Road uses the existing emissions-based paid parking approach, with vehicle CO2 data or engine capacity data used where applicable, and with the charge structure set out in the consultation material and Traffic Regulation Order report. This approach is already familiar from other council-managed paid parking locations in Bath, including the adjacent Royal Victoria Park.

4.7.17 The council also recognises feedback that enforcement levels should be sufficient to make any changes effective. Officer resources are finite and must be allocated according to demand and wider operational priorities. The council values information from local communities and uses this to help deploy officers where specific issues are identified.

4.7.18 Overall, the council considers that the introduction of emissions-based charges on Weston Road is a proportionate way to manage a currently unrestricted section of kerb space close to the city centre and Royal Victoria Park. The proposal retains short-stay free parking, supports turnover, aligns with existing emissions-based charging principles, and sits within the wider policy direction of improving travel choices and managing vehicle demand in Bath. The council acknowledges the concerns raised about displacement, affordability, local access and enforcement, and these should continue to be monitored through existing local parking review and residents' parking scheme processes.

4.8 To what extent do you support or oppose our proposals to remove some permit parking bays on Monmouth Street, and to change dual use permit/paid for parking spaces on Monmouth Place to permit spaces only

4.8.1 The purpose of this proposal is to support the opening and operation of the new Avon and Somerset Police operational base on Monmouth Street. Providing dedicated spaces for marked Police vehicles directly adjacent to the premises will support quicker deployment of officers and improve visible policing within the city centre.

4.8.2 The council recognises the concerns raised by residents about the loss of permit holder parking on Monmouth Street, particularly in an area where kerb space is limited and demand for parking is high. The proposal has therefore been designed so that the loss of permit holder parking on Monmouth Street is offset by converting an equivalent length of dual-use parking on Monmouth

Place to permit holder parking only.

- 4.8.3 The council also recognises that some respondents were concerned this would not fully replace the convenience of the existing permit bays, particularly for residents living closest to Monmouth Street. However, the proposal does not remove parking from the Central Zone overall without mitigation. Instead, it reallocates parking within the immediate area to balance the operational needs of the Police with resident parking access.
- 4.8.4 Respondents also raised concerns about the loss of short-stay pay and display parking on Monmouth Place, including potential impacts on city centre businesses, visitors, tradespeople, loading and short errands. The council acknowledges that short-stay parking can support access to local shops and services, particularly where visitors need to carry goods or make brief visits. However, this must be balanced against the need to provide suitable operational parking for marked Police vehicles at a new city centre base, and the need to mitigate the loss of resident permit bays by increasing permit holder-only provision nearby. Formal loading bays (subject to vehicle type restrictions) and permit holder parking bays can be used by any motorists for the purpose of loading and unloading goods.
- 4.8.5 The Chief Constable was consulted as part of the informal consultation process and confirmed that the provision of dedicated parking outside the new Police premises would assist Avon and Somerset Police in serving Bath and the surrounding area. The response stated that parking directly adjacent to the operational premises would assist officers to deploy quickly and boost their visibility. Maintaining an effective policing presence in Bath city centre remains of benefit to the wider community.
- 4.8.6 The council notes concerns raised by some respondents that the Police should have secured off-street parking as part of the premises arrangement, rather than using highway space. Although the new premises provide more off-street capacity than was available at Manvers Street, this does not fully meet operational requirements. Marked Police vehicle parking directly next to the operational base is considered necessary to support public safety, police visibility and rapid operational response.
- 4.8.7 Some respondents suggested alternative locations for Police parking or requested further replacement parking elsewhere. The council has considered the specific location requirements of the proposal and the operational benefit of marked Police vehicles being directly adjacent to the new base. The conversion of dual-use parking on Monmouth Place to permit-only use provides the most direct mitigation for resident permit holders within the immediate area.

- 4.8.8 The council understands concerns that any reduction in parking flexibility can lead to additional vehicle circulation, as drivers search for alternative spaces. However, the proposal is limited in scale and includes a direct compensating change for permit holders. The formalisation of the loading bay on Monmouth Place will also help clarify the intended use of that kerb space and support servicing needs.
- 4.8.9 In considering the proposal, the council must balance a range of factors, including resident access, business and visitor needs, loading, public safety, police operational requirements and the efficient management of the highway. The council has considered its duty under section 122 of the Road Traffic Regulation Act 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic, including pedestrians, so far as practicable.
- 4.8.10 The council has also considered its network management duty under section 16 of the Traffic Management Act 2004 and has concluded that the proposed Order is consistent with that duty, having regard to the council's wider policies and objectives.
- 4.8.11 The Movement Strategy for Bath sets out a need to manage competing demands for limited street space, improve travel choices and reduce vehicle traffic volumes, while ensuring Bath remains accessible for residents, businesses and visitors. The strategy also recognises that some people will continue to need to drive and that the transport system must meet the needs of essential car users. This proposal is consistent with that wider approach, as it seeks to manage limited kerb space for defined operational, resident and loading needs.
- 4.8.12 The council recognises comments about accessibility for disabled people, older people, carers and health workers. Blue Badge holders can park for no charge on single or double yellow lines for up to three hours where the Blue Badge and clock are displayed, and in resident permit bays and paid-for on-street parking bays for as long as needed. The council will continue to consider accessibility issues as part of the implementation and enforcement of parking restrictions.
- 4.8.13 Some respondents raised concerns about enforcement and whether new restrictions would be properly managed. The council recognises that effective enforcement is important to ensure that restrictions operate as intended and that the benefits of any changes are realised.
- 4.8.14 The proposal is not intended to raise revenue. The Statement of Reasons notes that parking permit charges cannot be introduced for the purpose, whether primary or secondary, of raising revenue. This particular proposal is a restriction change intended to support Police operations while mitigating the

effect on resident permit parking nearby.

4.8.15 The council has had due regard to the needs set out in section 149 of the Equality Act 2010 and considers that the proposed change is consistent with the public sector equality duty. An Equality Impact Assessment has also been undertaken in relation to the proposal.

4.8.16 Overall, the council accepts that the proposal will change the balance of parking use in a small part of the Central Zone and that some respondents would prefer the existing arrangement to remain unchanged. However, the proposal provides dedicated parking for marked Police vehicles directly outside the new operational base, supporting quicker deployment and visible policing, while replacing the lost permit holder length through the conversion of nearby dual-use parking to permit-only use. On balance, the council considers that the proposal remains proportionate and should be progressed.

4.9 To what extent do you support or oppose our additional proposals concerning car parks at Bath Sports and Leisure Centre, Larkhall Square and the Holburne Museum?

4.9.1 These proposals are operational amendments rather than a wider review of parking policy. They include updating the daytime charging hours at Bath Sports and Leisure Centre car park from 08:00–20:00 to 06:00–20:00, removing the Holburne Museum from the TRO as it is not controlled by the council, removing the 4-hour overnight maximum stay for electric vehicles whilst charging at Larkhall Square Car Park, and clarifying that digital authorisation within a council car park does not require a physical ticket to be displayed.

4.9.2 The council recognises concerns raised by respondents about affordability and the cumulative impact of parking charges, particularly where people rely on a car for work, caring responsibilities, leisure activities or other essential journeys. These concerns have been considered alongside the purpose of these changes, which is to improve the way existing car parks operate, provide greater clarity for users, and support fair access to parking facilities where demand and operational arrangements have changed. The proposals have also been developed having regard to the council's duties under section 122 of the Road Traffic Regulation Act 1984 and section 16 of the Traffic Management Act 2004.

4.9.3 A number of respondents raised broader concerns regarding parking charges, transport policy, public transport provision and the affordability of travelling within Bath. Whilst the council recognises these concerns, the majority of the amendments included within this proposal are operational or administrative in nature. Three of the four proposed changes do not introduce new parking charges and are intended to improve clarity, reflect current operational control

or support access to electric vehicle charging infrastructure. Wider matters relating to parking policy, public transport and sustainable travel are addressed through separate council strategies and programmes. The fourth proposal changes only the charging period that applies to early morning users, noting that 24 hour charges remain, but does not increase the underlying parking tariff.

- 4.9.4 Some respondents opposed the earlier start time for daytime charges at Bath Sports and Leisure Centre car park, particularly because of the potential impact on early-morning users of the gym, pool and leisure facilities. The council acknowledges that parking charges can affect how people choose to access facilities, especially where visits take place before work or before other caring responsibilities. However, the current arrangement can require some users attending activities beginning between 06:30 and 08:00 to purchase an overnight stay for only a short overlap with the charging period. Adjusting the daytime charging period to start at 06:00 is intended to provide a clearer and fairer charging structure for these users, while supporting access to early-morning activities that are beneficial to health.
- 4.9.5 Concerns were also raised that the change at Bath Sports and Leisure Centre car park could deter early-morning exercise or affect people who feel they need to park close to the facility for personal safety or caring reasons. The council recognises these concerns, particularly during darker winter mornings. However, the proposal does not remove access to the car park, require users to park further away from the location, or introduce a restriction on who may use it. Rather, it adjusts the charging period so that users attending early-morning activities are charged under the daytime tariff rather than potentially needing to purchase an overnight stay as well.
- 4.9.6 Some respondents suggested that parking at Bath Sports and Leisure Centre car park should be restricted to facility users only, potentially through a permit or check-in system. The council notes that such arrangements may appear attractive where there are concerns about non-facility users occupying spaces. However, introducing a user-specific control system would add operational complexity and could create additional barriers for occasional users, visitors, families and people less confident using digital systems. At this stage, the proposal is limited to amending the charging hours and does not seek to introduce new eligibility controls for use of the car park, noting that the facility is itself a public car park and not just for visitors to the leisure centre.
- 4.9.7 Feedback on Larkhall Square Car Park focused on removing the 4-hour overnight limit for electric vehicles while charging. The council recognises concerns that removing the limit could reduce turnover if vehicles remain connected after charging has finished. However, the purpose of the change is to allow local residents, particularly those without off-street parking, to use the electric vehicle charging facilities overnight. This supports the transition to

electric vehicles, enables slower overnight charging, and aligns these bays with other council car parks where overnight parking restrictions do not apply between 20:00 and 08:00. As with any council-managed car park where ANPR enforcement cannot be used, drivers are expected to use the facilities responsibly and in accordance with the terms and conditions of use.

- 4.9.8 The council also notes concerns about the potential impact of parking changes on local businesses and the character of Larkhall Square. This proposal does not introduce a new paid parking arrangement at Larkhall Square Car Park; it specifically relates to the overnight use of electric vehicle charging bays. The purpose is to improve practical access to charging for local residents and support more sustainable vehicle use in areas where off-street charging opportunities are limited. As no changes are proposed to daytime parking arrangements or parking charges at Larkhall Square, these matters fall outside the scope of this proposal.
- 4.9.9 Respondents generally recognised that the proposed removal of the Holburne Museum from the TRO is administrative in nature. The council no longer maintains operational control over this privately owned location, and therefore its removal from the TRO is necessary to ensure that the order accurately reflects the car parks controlled by the council.
- 4.9.10 Some respondents requested further clarity on future management, access and pricing at the Holburne Museum. These matters fall outside the scope of this review because the site is not controlled by the council. They should therefore be raised directly with the landowner, who is responsible for any charges or controls at the site. The council's amendment is limited to removing the location from the order so that the TRO accurately reflects current operational responsibility.
- 4.9.11 The clarification that a digital authorisation does not require a physical ticket to be displayed was also raised by respondents, including concerns about digital exclusion. The council recognises that not all users are equally confident with app-based or digital services. However, this change is a technical clarification within the order and reflects existing practice where paid parking, permits or season tickets may be purchased through the council's current supplier, MiPermit. It confirms that a valid digital authorisation is sufficient and that no physical ticket or other evidence needs to be displayed in the vehicle.
- 4.9.12 Some comments raised broader matters about enforcement, ticket machine reliability, accessibility, public transport, Park and Ride charges and the cumulative impact of other parking proposals. Where these points relate to wider policy matters, they are addressed elsewhere in this report, including the discussion of Park and Ride charges and the wider approach to sustainable transport, active travel and parking management. Operational

matters relating to payment equipment and enforcement deployment are outside the scope of the proposed TRO amendment but continue to be monitored by the council.

4.9.13 An Equalities Impact Assessment has been completed in conjunction with these proposals and no changes are considered necessary following review of consultation responses.

4.9.14 Having considered the feedback received, it is not considered that the comments raise issues that require amendment to these operational proposals. The changes are limited, practical and intended to ensure the TRO reflects current operational control, improves access for early-morning leisure centre users, supports overnight electric vehicle charging for residents without off-street parking, and provides clarity for customers using digital parking authorisations. It is therefore recommended that these additional car park operational amendments are progressed as advertised.

Appendix A – Details of proposed charges

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

1. Proposed charging bands and charges based on vehicle size

Vehicles are grouped into bands based on their size (area in metres squared). The permit charge or discount applied will depend on the vehicle's band and whether it is a first or second permit.

Band	Area lower range (metres squared)	Area upper range (metres squared)	Discount or charge multiplier – 1st permit	Discount or charge multiplier – 2nd permit
1	0	5.00	Fixed discount - £20	Vehicle area multiplied by £2
2	5.01	6.00	Fixed discount - £10	Vehicle area multiplied by £4
3	6.01	7.00	Fixed discount - £10	Vehicle area multiplied by £6
4	7.01	8.00	Vehicle area multiplied by £1	Vehicle area multiplied by £8
5	8.01	9.00	Vehicle area multiplied by £2	Vehicle area multiplied by £10
6	9.01	10.00	Vehicle area multiplied by £3	Vehicle area multiplied by £12
7	10.01	11.00	Vehicle area multiplied by £4	Vehicle area multiplied by £14
8	11.01	12.00	Vehicle area multiplied by £5	Vehicle area multiplied by £16
9	12.01	13.00	Vehicle area multiplied by £6	Vehicle area multiplied by £18
10	13.01	14.00	Vehicle area multiplied by £7	Vehicle area multiplied by £20
11	14.01	no maximum	Fixed charge of £112.08	Fixed charge of £308.22

2. Proposed Visitor permit charges

	Current price	Year 1, 2026	Year 2, 2027	Year 3, 2028
100 digital hours	£10	£15	£20	£25
10 days (paper)	£10	£15	£20	£25
20 half-days (paper)	£10	£15	£20	£25
Equivalent permit cost/day	£1	£1.50	£2	£2.50

3. Proposed charges at Weston Road, Bath

Hours	Cost	Time period
Up to 1 hours	Free	Monday to Sunday, 8am to 6pm
Up to 2 hours	£2.00 to £3.00	Monday to Sunday, 8am to 6pm
Up to 3 hours	£4.50 to £6.00	Monday to Sunday, 8am to 6pm
Up to 4 hours	£6.00 to £7.80	Monday to Sunday, 8am to 6pm

4. Proposed Park and Ride charges

Duration	Current charge	Proposed charge from Oct 2026
Up to 3 hours	£2.00	£2.00 (<i>no change</i>)
Up to 24 hours	£3.00	£4.00 (<i>£1 increase</i>)

Appendix B – Common price per size examples

Shown below are the examples used in the public consultation to demonstrate the indicate size-based charge for a range of vehicles, taken from actual permit data.

Make	Model	Length (mm)	Width (mm)	Area (m ²)	Annual charge: 1st Permit	Annual charge: 2nd Permit
Smart	Fortwo Passion MHD Auto	2695	1559	4.2	-£20.00	£8.40
Toyota	IQ3 VVT-I CVT	2985	1680	5.01	-£10.00	£20.04
Toyota	Aygo+ VVT-I	3405	1615	5.5	-£10.00	£22.00
Kia	Picanto LX	3495	1595	5.57	-£10.00	£22.28
Fiat	Panda Dynamic 360	3538	1578	5.58	-£10.00	£22.32
Peugeot	107 Urban	3430	1630	5.59	-£10.00	£22.36
Citroen	C1 VT	3435	1630	5.6	-£10.00	£22.40
Hyundai	I10 Classic	3565	1595	5.69	-£10.00	£22.76
Volkswagen	Up GTI	3600	1645	5.92	-£10.00	£23.68
Hyundai	I10 SE	3665	1660	6.08	-£10.00	£36.48
Mini	Mini Cooper	3626	1688	6.12	-£10.00	£36.72
Ford	Ka Zetec	3620	1702	6.16	-£10.00	£36.96
Nissan	Micra SX	3715	1660	6.17	-£10.00	£37.02
Volkswagen	Polo S TDI 70	3916	1650	6.46	-£10.00	£38.76
Peugeot	108 Active	3475	1884	6.55	-£10.00	£38.76
Toyota	Yaris TR VVT-I	3885	1695	6.59	-£10.00	£39.54
Honda	Jazz I-VTEC ES	3900	1695	6.61	-£10.00	£39.66
Mercedes-Benz	A160 Classic SE CVT	3838	1764	6.77	-£10.00	£40.62
Fiat	Punto Easy	4065	1687	6.86	-£10.00	£41.16
Audi	A1 Sport 25 TFSI	4029	1740	7.01	£7.01	£56.08
Vauxhall	Corsa Energy	4021	1746	7.02	£7.02	£56.16
Renault	Clio Play 16V	4063	1732	7.04	£7.04	£56.32
Peugeot	208 Allure Premium EV	4055	1745	7.08	£7.08	£56.64
Volkswagen	Polo SE Evo	4053	1751	7.1	£7.10	£56.80
Peugeot	308 Active SW HDI Blue S/S	4585	1563	7.17	£7.17	£57.36
Volkswagen	Golf TDI SE	4149	1735	7.2	£7.20	£57.60
Ford	Fiesta Active X Edition T MHEV	4068	1941	7.9	£7.90	£63.20
Nissan	Qashqai N-Connecta DCI	4377	1806	7.9	£7.90	£63.20
Audi	Q3 SE TFSI	4385	1831	8.03	£16.06	£80.30

Make	Model	Length (mm)	Width (mm)	Area (m²)	Annual charge: 1st Permit	Annual charge: 2nd Permit
Nissan	Leaf N-Connecta	4490	1788	8.03	£16.06	£80.30
Audi	A4 T (190) S Line	4545	1772	8.05	£16.10	£80.50
BMW	Z4 M40i	4324	1864	8.06	£16.12	£80.60
Kia	Niro 3 HEV S-A	4420	1825	8.07	£16.14	£80.70
BMW	X1 Xdrive18D Xline Auto	4439	1821	8.08	£16.16	£80.80
Peugeot	Partner Combi HDI	4137	1960	8.11	£16.22	£81.10
Ford	Focus Zetec	4337	2019	8.76	£17.52	£87.60
Ford	C-MAX Zetec	4333	2022	8.76	£17.52	£87.60
Audi	Q5 S Line Plus TDI Quattro	4629	1898	8.79	£17.58	£87.90
Vauxhall	Zafira Tourer Design Turbo	4666	1884	8.79	£17.58	£87.90
Aston Martin	Vantage V8	4380	2022	8.86	£17.72	£88.60
Vauxhall	Astra Elite	4419	2013	8.9	£17.80	£89.00
BMW	X3 Xdrive20D M Sport Auto	4708	1891	8.9	£17.80	£89.00
Ford	Mondeo ST-LINE TDCI	4867	1852	9.01	£27.03	£108.12
Renault	Scenic Privilege VVT CVT	4344	2077	9.02	£27.06	£108.24
Vauxhall	Zafria Exclusiv	4467	2026	9.05	£27.15	£108.60
Ford	C-MAX Zetec Turbo	4380	2067	9.05	£27.15	£108.60
Tesla	Model Y Long Range AWD	4750	1921	9.12	£27.36	£109.44
BMW	520D SE	4907	1860	9.13	£27.39	£109.56
Ford	Galaxy Zetec TDCI	4820	2154	10.38	£41.52	£145.32
Jaguar	F-Pace SE D MHEV AWD Auto	4747	2175	10.32	£41.28	£144.48
Land Rover	Discovery TD5 ES	4705	2190	10.3	£41.20	£144.20
Audi	A7 S Line 50 TDI MHEV Quat S-A	4969	2118	10.52	£42.08	£147.28
Ford	Transit Custom 320Leader Eblue	5340	1986	10.61	£42.44	£148.54
Peugeot	Boxer 335 Pro L2H2 Blue HDI	5413	2050	11.1	£55.50	£177.60
Audi	Q7 SLN BLK ED 55TFSI MHEV QT A	5063	2212	11.2	£56.00	£179.20
Renault	Trafic SL27 Sport NAV ENGY DCI	4999	2283	11.41	£57.05	£182.56
Mercedes- Benz	Sprinter 314CDI	5870	1993	11.7	£58.50	£187.20

Make	Model	Length (mm)	Width (mm)	Area (m²)	Annual charge: 1st Permit	Annual charge: 2nd Permit
Peugeot	Boxer 335 Pro L3H2 BHDI	5998	2050	12.3	£73.80	£221.40
Ford	E-Transit 350 Leader	5981	2059	12.31	£73.86	£221.58
Renault	Master LM35 Business+ DCI	6225	2070	12.89	£77.34	£232.02
Mercedes	Sprinter 315 CDI LWB	6940	1960	13.6	£95.20	£272.00
Ford	Transit 290	5531	2474	13.68	£95.76	£273.60
Ford	Transit 350	5981	2474	14.8	£112.08	£308.22
Mercedes- Benz	Sprinter 319 Premium CDI	6967	2345	16.34	£112.08	£308.22

Appendix C – Distribution of responses by respondent's location

Ward	Number of responses	% of total response
Unknown or Outside B&NES	144	15.8%
Widcombe & Lyncombe	126	13.9%
Walcot	94	10.3%
Lansdown	81	8.9%
Kingsmead	79	8.7%
Bathwick	75	8.3%
Westmoreland	63	6.9%
Oldfield Park	47	5.2%
Weston	46	5.1%
Newbridge	35	3.9%
Southdown	20	2.2%
Bathavon North	17	1.9%
Lambridge	16	1.8%
Odd Down	13	1.4%
Moorlands	10	1.1%
Combe Down	9	1.0%
Twerton	5	0.6%
Bathavon South	4	0.4%
Keynsham North	4	0.4%
Saltford	4	0.4%
Peasedown	4	0.4%
Keynsham East	3	0.3%
Timsbury	3	0.3%
Keynsham South	2	0.2%
Radstock	1	0.1%
Chew Valley	1	0.1%
Mendip	1	0.1%
Grand Total	909	100%