

OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

5a

OUTCOME OF TRO PROCESS – DECISION (following objections)

PREPARED BY: Traffic Management Team, Highways and Traffic Group

TITLE OF REPORT: RPZ Locksbrook Road area

PROPOSAL: Various Waiting and Parking Restrictions

SCHEME REF No: 26 – 044

REPORT AUTHOR: Helen Holm (AECOM)

1. DELEGATION

The delegation to be exercised in this report is contained within **Part 2 Section 2.35** of the Constitution under the **Delegations of Functions to Officers**, as follows:

Section A	The Chief Executive, Executive Director - Chief Operating Officer, Directors and Heads of Service have delegated power to take any decision falling within their area of responsibility....”
Section B	Without prejudice to the generality of this, Officers are authorised to: serve any notices and make, amend or revoke any orders falling within their area of responsibility.
Section D	An Officer to whom a power, duty or function is delegated may nominate or authorise another Officer to exercise that power, duty or function, provided that Officer reports to or is responsible to the delegator.

For the purposes of this report, the Director of Place Management and the Head of Highways Delivery hold the delegated power to make, amend or revoke any Orders.

2. LEGAL AUTHORITY

This proposal is made in accordance with the Road Traffic Regulation Act 1984, which under Section 1 provides, generally, for Orders to be made for the following reasons, and in the case of this report specifically for the reason(s) shown below:

(a)	for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or	X
(b)	for preventing damage to the road or to any building on or near the road, or	
(c)	for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or	X
(d)	for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property,	

(e)	(without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or	
(f)	for preserving or improving the amenities of the area through which the road runs, or	X
(g)	for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality)	

3. **PROPOSAL**

To implement various parking and waiting restrictions, including designated parking bays reserved for disabled badge holders only and permit holders only.

The proposals are shown in **Appendix 1** attached to this report.

4. **REASON**

Please refer to the Statement of Reasons.

The Council has had in mind and discharged the duty (as set out in section 122(1) 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. It has also had regard to the factors which point in favour of imposing the proposed parking restrictions. It has balanced the various considerations and concluded that it is appropriate to promote the proposed parking, waiting and loading restrictions, including designated parking bays reserved for disabled badge holders only and permit holders only. The Council has also considered and discharged its network management duty under section 16 of the Traffic Management Act 2004. It has concluded that the proposed restrictions are consistent with that duty, having regard to its other policies and objectives.

5. **IMPACT ON EQUALITIES**

An Equality Impact Assessment has been undertaken in relation to the introduction of parking restrictions, which is available upon request. The Council has had due regard to the needs set out in section 149(1) of the Equality Act 2010. It considers that the proposed Order is consistent with the section 149 public sector equality duty, which it has discharged.

6. **IMPACT ON HUMAN RIGHTS**

The proposals are considered to have a minimal impact on human rights (such as the right to respect for private and family life and the right to peaceful enjoyment of property). However, the Council is entitled to affect these rights where it is in accordance with the law, necessary (in the interests of public safety or economic well-being, to prevent disorder and crime, to protect health, or to protect the rights and freedoms of others), in pursuit of a legitimate aim and proportionate to do so. The proposal(s) within this report are considered to be in accordance with the law, necessary, in pursuit of a legitimate aim and proportionate.

7. SOURCE OF FINANCE

This proposal is being funded by RPZ capital budget 3LY10; Project Code: TC9920S

8. CONSULTATION REQUIREMENT

The proposal requires consultation with the Chief Constable, Emergency Services, Road Haulage Association, Freight Transport Association (Logistics UK), Parking Services, Waste Services, Ward Members and the Cabinet Member for Sustainable Transport Delivery.

The responses to the informal consultation can be found in TRO report number 3.

9. OBJECTIONS / COMMENTS RECEIVED (following the public advertisement of the proposal(s))

The objections received have been summarised below with the technical responses in italics underneath each theme of objection. A full consultation report will be available on the project website (<https://www.bathnes.gov.uk/locksbrook-road-area-residents-parking-zone-public-consultation>).

A total of 70 individual responses were received during the consultation period.

Postcode data was used to evaluate which respondents lived in the RPZ and which lived outside it. Most respondents lived in the proposed zone (n=59) with a total of 11 respondents from outside the zone.

Most of the respondents were residents (n=61). Respondents provided their consultation responses in the following capacities:

- Resident (n=61)
- Business (n=4)
- Visitor (n=2)
- Stakeholder Group (n=1)
- Commuter (n=1)
- Other (n=1)

In total 35 respondents wholly or partly supported the proposal. 33 respondents wholly or partly objected to the proposal. 2 respondents neither supported nor objected to the proposal.

Of the 61 respondents that live in the proposed zone, 34 wholly or partly supported the proposal while 24 wholly or partly objected to the proposal.

All but 2 respondents that live outside of the proposed zone wholly or partly objected to the proposal.

Table 1: Level of support or objection to the proposal

Level of support	Live in the proposed zone	Live outside the proposed zone	TOTAL
Wholly support	23	1	24
Partly support	11	0	11
Neither support nor object	1	1	2
Partly object	10	3	13
Wholly object	14	6	20
TOTAL: Wholly or partly support	34	1	35
TOTAL: Wholly or partly object	24	9	33
BASE: All respondents	59	11	70

In addition to being able to express support or objection to the proposal, respondents were able to add free text to explain their reasons for supporting or objecting to the proposal.

All 70 respondents added free text in their submission and these responses have been grouped into themes and tabulated in the following sections of this report below.

Table 2: Number of respondents providing free-text feedback by theme

Theme	Number
Parking	50
Access	13
Finance	12
Traffic	6
Safety	4
Environment	1
Other	36

Comments received in objection

Comments expressing objection to the proposal relating to parking, access, finance, traffic, environment and other comments are summarised below in the relevant sections.

Parking

In total 52 comments were received in objection to the proposal in relation to parking and these are summarised in Table 3 below.

Table 3: Comments received in objection relating to parking

Theme	Number
Oppose double yellow lines / Change double yellow lines to single	13
Will cause parking issues / reduce parking capacity for residents	12
Will cause parking issues / reduce parking capacity for visitors / commuters	11
Concern about losing too many spaces	5
Insufficient permit allowance for households	4
Electric charging spaces not taken into consideration	4
Parking restrictions should not be enforced on weekends	3

Officer response

The designs for this scheme closely reflect the manner in which vehicles currently park on street. Where new restrictions have been proposed, this has been done so to improve road safety. Requests for changes to double yellow line placement will be reviewed and where the road circumstances allow these changes will be incorporated. Where road safety could be compromised by changing the design from what is proposed, changes will not be brought about. We appreciate that in some cases this may result in fewer parking spaces, but the aim is that, by limiting access to permit holders only, the net result will be more capacity for residents and their visitors.

Visitors to the area can access visitor permits if they are visiting a resident or a business and need to park on street. In addition, there are a number of bays in the proposed zone which allow non-permit holders to park for a limited period of time. Visitor permits are used widely in other RPZs by residents and businesses.

All new RPZs operate under the same conditions including the maximum number of permits allowed per residence, days of operation and times of operation. These elements were not considered at part of this TRO as this is standard for all new RPZs.

Electric vehicles should not be charged while parked on street, as this would require a cable to be trailed across the pavement between the property and vehicle, creating a hazard for those using the pavement. For those operating co-charging from their off-street parking, they may still be eligible for parking permits, depending on individual circumstances.

Access

Respondents submitted 22 comments in relation to access and these are summarised in Table 4 below.

Table 4: Comments received in objection relating to access

Theme	Number
Visiting tradespeople / local business staff parking concerns	7
Limits access to businesses	5
Unfair on those who cannot switch from car to public transport, cycling walking	5
Unfair on the elderly / disabled / residents with carers	4
Contradicts local School Street scheme	1

Officer response

Tradespeople and organisations providing services to properties within an RPZ are able to use bespoke permits to park on street. These are available as standard, and many local tradespeople and care organisations use these actively. Officers do not foresee any difficulties for such service providers in any new RPZs.

Areas of dual use bays have been incorporated in the proposals. These allow visitors (non-permit holders) to park for limited durations and facilitate access to businesses. In addition, a number of dual use bays are available in neighbouring RPZs. For those working in the proposed zone, options exist in terms of the Newbridge Park and Ride which drops off and picks up near Chelsea Road. Vehicle owners can also Park and Stride from this site should they choose to travel to their workplace by other means after parking here.

Blue Badge holders living in or visiting the zone can park in a bay without a permit as long as their Blue Badge is on display in the vehicle. When purchasing a parking permit, payment options exist to help reduce the initial outlay for a permit. Permits can be bought with 1 month, 3 months, 6 months and 12 months validity.

The introduction of an RPZ would not prevent people from accessing the area by car/motor vehicle or from parking in the area. RPZs aim to reduce external parking pressures for on-street parking by allowing property occupiers in the zone to purchase limited numbers of permits. Properties with off street parking have reduced access to permits, therefore encouraging them to use their private parking. Visitors can make use of dual use bays for limited periods or access visitor permits via residents or businesses they are visiting in the zone. Access to the area by car/motor vehicle remains possible for many.

Upon the introduction of a School Street at Newbridge Primary School, the council produced a Park and Stride map to support parents who still need to drive to school to drop off and pick up children from the site. This map identified 12 locations where parents may be able to park for a short period of time then complete their journey on foot. None of these locations were located in the proposed RPZ for the Locksbrook Road area.

Finance

Respondents submitted 12 comments in relation to access and these are summarised in table 5 below.

Table 5: Comments received in objection relating to finance

Theme	Number
Concerns over costs to users	10
Scheme is waste of money / costs too much	1
Additional financial impact on businesses	1

Officer response

Officers appreciate that some residents and businesses based in the proposed zone may not currently pay to park near their home or business, and that the proposal reflects a change, should it be progressed. But the aim is that parking pressure would ease in the area and road safety would be improved. Permit prices vary dependent on vehicle emissions and vehicle size, with discounts applied to permit holders of small vehicles. When purchasing a parking permit, payment options exist to help reduce the initial outlay for a permit. Permits can be bought with 1 month, 3 months, 6 months and 12 months validity.

Income generated from the RPZs in Bath is legally ring-fenced to support local transport-related schemes and fund the installation and operational management of the parking system itself.

A range of options exist for staff and visitors to local businesses including use of public transport, dual use bays and business permits. While some may result in extra cost to businesses, the aim is that parking for essential visitors and customers will become easier if the proposals are progressed.

Traffic

Respondents submitted 7 comments in relation to traffic and these are summarised in table 6 below.

Table 6: Comments received in objection relating to traffic

Theme	Number
Will displace traffic / increase traffic and parking issues elsewhere	5
Public transport is not convenient / not affordable / needs to be improved	2

Officer response

Officers are aware that some drivers may try to park in other areas outside of the proposed RPZ boundary where no parking restrictions exist. As these practices require extra effort to achieve the same outcome, it is hoped that drivers will not continue these practices in the longer term.

This will be monitored and residents of neighbouring roads are encouraged to report any concerns to their ward councillors, who in turn will share this with officers.

Environment

One respondent did not feel that the introduction of an RPZ would have a positive impact on air pollution.

Officer response

It is expected that by reducing capacity for non-residents or business parking, the area would experience less circulating vehicular traffic, which will result in fewer roadside emissions. In addition, emissions-based permit charges would also encourage residents to consider choosing lower emission vehicles.

Other

Respondents submitted 22 comments in relation to traffic and these are summarised in table 7 below.

Table 7: Comments received in objection relating to other topics

Theme	Number
Scheme is unnecessary / not needed	12
Criticism of government/council/Local authority	6
Disagree that non-residents are able to respond to the consultation / only residents' views should be considered	3
Consultation is a waste of time / comments do not get considered	1

Officer response

The proposals have come about as a result of requests from local residents, to help improve access to on-street parking in the area. Ward councillors have, to date, been supportive of consulting on this proposal.

Responses from all respondents have been considered as part of this consultation process.

Comments received in support

In total 41 comments expressing support were submitted in relation to parking, access, safety and other topics are summarised below in table 8.

Table 8: Comments received in support relating to parking, access safety and other topics

Theme	Number
Will improve parking in the area	10
Parking operating hours will improve parking	5
Permits should be free for residents	2
Visitors / commuters should be charged instead of residents	1
Further action needed to reduce HGV's	1
Will have a positive impact on walking / cycling	1
Will improve safety for children	3
Will improve safety with walking	2
Will improve safety with cycling	2
Add areas or streets to the zone	5
Will have a positive impact on residents	4
Reduce the number of students bringing their cars into the city	3
Will have a positive impact on the area / the area is more pleasant	2

10. ADDITIONAL COMMENTS FROM WARD MEMBERS AND CABINET MEMBER FOR SUSTAINABLE TRANSPORT DELIVERY (in response to the above)

Cllr Michelle O'Doherty - I support the proposed TRO. The consultation has given residents and businesses the opportunity to comment, and I am satisfied that the objections raised have been properly considered.

The scheme is in response to local concerns about parking and road safety, and I welcome the commitment to review the detail of the scheme and monitor any impact on surrounding roads.

I am therefore happy for the TRO to proceed.

Cllr Samantha Kelly – No comment.

Cabinet Member for Sustainable Transport Delivery:

Councillor Lucy Hodge - This RPZ proposal aims to address longstanding concerns about parking and safety. I am satisfied that the objections raised

have been fully considered and support the proposal for this RPZ as set out in the report.

11. RECOMMENDATION

That the Traffic Regulation Order as advertised should be sealed.



Paul Garrod
Head of Highways Delivery

Date: 14/09/2026

12. DECISION

As the Officer holding the above delegation, I have decided that the objections / comments be not acceded to and the Order as advertised be sealed.

The Council's policy framework has been used as the basis to develop the scheme with full engagement with stakeholders across the area.

I further note that the issue of deciding whether to implement any scheme is a matter of broad judgement, taking into account the wider transport and climate aims of the Council rather than a purely mathematical analysis on the numbers of positive or negative responses.

The arguments both for and against the scheme were clearly identified and were considered fully as part of the decision-making process before I made the final decision as set out above.



Chris Major
Director for Place Management

Date: 14/09/2026