

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: Larkhall Square, Upper Lambridge Street & St Saviours Road

PROPOSAL: Loading restrictions and correcting double yellow lines.

SCHEME REF No: 26-025

REPORT AUTHOR: Sadie Cox-Alcuaz

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 introduce 'no loading at any time' loading restrictions on lengths of existing double yellow line parking restriction.

To incorporate an existing length of double yellow line parking restriction into a TRO. This restriction is in place on the carriageway but is not currently supported by a TRO.

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 loading restrictions and incorporating a length of existing parking restriction into a TRO. It has balanced the various considerations and concluded that it is appropriate to promote these measures. 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 loading and parking 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 proposal, 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 the capital Parking budget.

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 objection/comments received have been summarised below with the technical response the one objection underneath.

Removing parking for cars in Larkhall in the area shown is going to be detrimental to businesses/shops in the area and will kill trade. There seems no good reason to reduce parking in this zone - it helps to slow traffic through the village centre. This would seem to be a deliberate ploy by Lidl to destroy the centre of Larkhall to make their store proposal look like the food option in the area. Another car focused anti pedestrian Larkhall business option from the car centric engineers that don't even live in Bath (having spoken to one or two at previous consultations).

Officer Response:

We understand the concern that any reduction in parking may have an impact on local businesses and the vitality of the village centre. Supporting local trade and maintaining the attractiveness of Larkhall as a destination is an important consideration in the development of any proposals.

The rationale behind the proposed changes is not to disadvantage businesses, but to address existing issues within the highway network. In

particular, the scheme seeks to improve road safety, visibility, and traffic flow through the village centre. Whilst on-street parking can have a traffic-calming effect, it can also create conflicts between vehicles, particularly at junctions and in areas with high pedestrian activity, which the proposals aim to mitigate.

In developing the scheme, a range of factors have been considered, including:

- The need to maintain safe and unobstructed routes for all road users, including pedestrians and cyclists.*
- The balance between parking provision and the operational effectiveness of the highway.*

The proposals are not associated with, nor influenced by, any private development interests. They have been prepared in accordance with the Council's statutory duties under the Road Traffic Regulation Act 1984, with the primary aim of improving safety and accessibility for all users of the highway.

Supporting Comments x 2

- I am writing to express my strong and unconditional support for the proposed variations under TRO Reference 26-025, specifically the introduction of the "No Waiting No Loading At Any Time" restrictions on the junctions of Larkhall Square, Upper Lambridge Street and St Saviours Road.

This standalone order is absolutely critical for public safety. My partner is registered blind and relies entirely on these specific dropped kerbs and tactile paving points to navigate the neighbourhood safely.

Currently, drivers frequently use these pedestrian crossing points as an unofficial loading bay. Because standard double yellow lines permit loading, delivery vehicles regularly block the tactile paving entirely, forcing my vulnerable partner directly into the flow of oncoming traffic. This ongoing hazard causes severe distress and undermines his independent mobility.

The proposed total prohibition of waiting and loading is a necessary measure to ensure the Council meets its Public Sector Equality Duty (PSED) under the Equality Act 2010 by ensuring safe, unobstructed access for disabled pedestrians.

I strongly urge the Council to implement this standalone scheme without delay or amendment.

- Support Representation: TRO 26-025 (Larkhall Square, St Saviours Road & Upper Lambridge Street)

I am writing to formally submit my representation regarding the proposed Permanent Traffic Regulation Order, reference TRO 26-025. From a deeply personal standpoint, I am close friend with a blind resident who lives directly within the affected Larkhall area. I observe first-hand how the current lack of managed parking, pavement obstructions, and unregulated loading significantly compromises his safety, navigation, and fundamental independence on a daily basis.

The implementation of these proposed prohibitions on stopping, waiting, and loading is not merely an issue of urban traffic management; it is a critical accessibility intervention. For a visually impaired individual, indiscriminate parking and chaotic vehicular flow create unpredictable, high-risk environments that effectively strip away their autonomy.

Under Section 149 of the Equality Act 2010, local authorities are bound by the Public Sector Equality Duty (PSED) to proactively remove barriers, advance equality of opportunity, and foster safe environments for disabled persons. Approving and enforcing TRO 26-025 is a vital, concrete step toward fulfilling this legal obligation. By creating a predictable, unobstructed streetscape in Larkhall Square and the surrounding corridors, the Council will directly safeguard the independence of vulnerable residents, ensuring the local infrastructure complies with both the spirit and the letter of statutory accessibility requirements.

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

Councillor Joanna Wright – No Comment

Councillor Saskia Heijltjes-

I support the proposed "No Loading At Any Time" restrictions at this junction. Keeping these junctions clear at all times would make a meaningful difference to accessibility and safety for pedestrians in Larkhall.

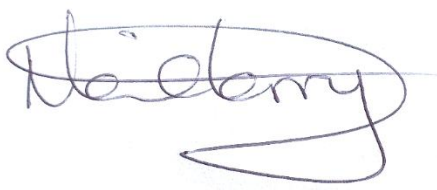
Cabinet Member for Sustainable Transport Delivery (Councillor Lucy Hodge)

Cllr Lucy Hodge-

Having read the consultation feedback and officer response, I am supportive of the proposal set out in this report.

11. RECOMMENDATION

That the Traffic Regulation Order as advertised should be sealed.

A handwritten signature in blue ink, appearing to read 'Neil Terry', with a large, sweeping flourish underneath.

Neil Terry
Traffic Management & Network Manager

Date: 28/09/2026

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.

A handwritten signature in black ink, appearing to read 'Chris Major', is positioned above the printed name.

Chris Major
Director for Place Management

Date:29/09/2026