

# **Emission-based car parking charges in Bath car parks**

## **Traffic Regulation Order Consultation Outcome Summary**

7 August 2023

Revision 01

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<b>Revision</b>	<b>Description</b>	<b>Issued by</b>	<b>Date</b>
01	Draft	AD	12/08/2023
02	Draft	JW	15/08/2023

Bath & North East Somerset Council Parking Services

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Date                **15 August 2023**

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# 1 Introduction

## 1.1 Background

- 1.1.1 These proposals have been developed to improve air quality through a major shift to walking, cycling and mass transit and incentives to reduce the use of more polluting vehicles to secure the safer movement of pedestrian, bikes and e-scooter traffic on the highway by reducing the public health risks posed to them by air pollution. These proposals are also aimed to facilitate the achievement of strategic outcomes of local transport policy by reducing congestion and vehicle intrusion into neighbourhoods, and particularly residential neighbourhoods and align with the Council policy on Liveable Neighbourhoods.
- 1.1.2 Air quality impacts on pedestrian safety, managing traffic flows and availability of parking are all significant issues in our region, particularly in the city of Bath. Whilst this proposal is a separate standalone scheme, they are complimentary to other projects aimed at addressing these issues, including but not limited to the following.
- a) Promoting a major shift to public transport, walking and cycling, with incentives to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy
  - b) Improving the safety of cyclists and pedestrians through active travel schemes which rebalance priorities on our roads and build on social distancing needs
  - c) The introduction of a Clean Air Zone in central Bath, to encourage less polluting ways of travelling around the city
  - d) Liveable Neighbourhoods policy and work concerning reducing the effect of motor vehicles on neighbourhoods, particularly residential neighbourhoods.
- 1.1.3 Air pollution can cause or contribute to a variety of health conditions, particularly amongst the young and elderly. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death to our health services and to business.
- 1.1.4 Air pollution causes up to 36,000 deaths, over 20,000 respiratory and cardiovascular hospital admissions and 6 million sick days every year in the UK, at an estimated total social cost of £22.6 billion per year. Any reduction in emissions within the city centre will have a beneficial impact on those living and visiting the city centre.

- 1.1.5 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 these proposals are not justified on climate change grounds; it is anticipated that the proposed 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 significantly reduce the level of emissions that drive climate change, as a result, for example, of encouraging a switch to low emission vehicles.
- 1.1.6 The council undertook significant engagement and consultation work to develop and implement the concept of emissions-based variable charging for on street parking permits in 2021 and this proposal further develops this work. The consultation document and outcomes reports are published online at:
- a) Spring 2021 engagement – <https://beta.bathnes.gov.uk/parking-permits-consultation-april-2021>
  - b) Autumn 2021 statutory consultation – <https://beta.bathnes.gov.uk/parking-TRO-consultation-autumn-2021>
- 1.1.7 An EQIA has been developed to consider the impact of this proposal on individuals and groups with protected characteristics and this will be reviewed to consider the feedback received from this consultation. This reviewed EQIA is included as Appendix Cc to this report.
- 1.1.8 New pay and display machines will be installed in the summer of 2023 as part of an existing programme of works to replace hardware that is at least 12 years old. Cash remains an important source of payment for some customers and will continue to be accepted at all current locations. The installation of modern pay and display equipment presents an opportunity to review the provision of card payment terminals in some locations.

## **1.2 Purpose of the consultation**

- 1.2.1 This consultation is to advertise proposals to introduce emission-based variable charging for council car parks in Bath to the existing Bath Off Street Traffic Regulation Order (TRO).
- 1.2.2 Emission-based charges do not apply at the Holburne Museum car park, which is provided exclusively for visitors to the Holburne Museum. Charges for the Holburne Museum car park were included within this consultation to address an anomaly from 2022 which saw the charges removed from the TRO.

### **1.3 Emission-based parking charges**

- 1.3.1 In line with savings proposals agreed in the 2023/24 council budget agreed by Full Council in February 2023, the Cabinet Member for Transport has agreed to progress with proposals which implement a new variable charging structure for council car parks in Bath that are linked to a vehicle's CO2 emissions and its fuel type.
- 1.3.2 This proposal is based on the existing Bath car park prices introduced on 1st November 2022 and applies the structure and rationale developed, and implemented in January 2022, for the council's emission-based on street residents parking permits linked to DVLA VED banding.
- 1.3.3 In addition to the CO2 variable charge, the price of parking for diesel fuelled vehicles will be further increased (in comparison to a vehicle of similar engine size and CO2 output of other fuel types) due to the relatively higher levels of other pollutants emitted from the tail pipe following the combustion of diesel fuel.
- 1.3.4 All customers can check their vehicle's emissions rating, fuel type, or engine capacity free of charge online at <https://www.gov.uk/get-vehicle-information-from-dvla>
- 1.3.5 Customers will be required to provide their vehicle registration mark when purchasing parking, including when paying with cash.
- 1.3.6 The drivers of the most polluting vehicles, this being those that emit more than 131g/km of CO2 or are fuelled by diesel, will pay progressively more for their parking based on the emissions from their tailpipe. Drivers of electric vehicles (who are required to pay for their parking and pay for any electric charging) or vehicles that emit up to 130g/km and are not diesel fuelled will see no change to their parking charges.
- 1.3.7 It's anticipated that a higher charge (those motorists as set out in paragraph 1.3.6) will be payable by 66% of customers. Where no DVLA data for a particular vehicle is available the maximum charge for the chosen tariff will apply.
  - a) The average charge per hour (excluding evening and overnight charges) would remain the same for around 34% of customers driving a less polluting vehicle. This is £1.20 per hour.
  - b) For the 66% of our car park customers, depending on the emissions of their vehicle, that would see additional charges would experience an average charge per hour of £1.31 (a increase of 11 pence per hour).
- 1.3.8 The proposed emission-based charging structure for Bath car parks is outlined in Appendix Aa to this report, with the charges for diesel fuelled vehicles shown in table 2 of Appendix Aa.

- 1.3.9 Emission-based charges are not proposed at the council's Park and Ride (P&R) sites or the Odd Down Coach Park as these facilities are located outside the city centre. Parking will remain free of charge to visitors at all three P&R sites when using the P&R service.
- 1.3.10 An emission-based charge introduces greater ability and control to incentivise the displacement of more polluting vehicles away from city centre car parks to more sustainable alternatives, including the city's park and ride service or other public transport options.
- 1.3.11 Season ticket charges for Bath car parks were last reviewed in 2022 alongside new parking charges (implemented in November 2022) and this resulted in season ticket costs being linked to a 35% discount against the equivalent daily parking charge. As a result of the historic high discounts offered for season tickets prior to the 2022 review, some customers experienced significant price rises. Season ticket costs are therefore proposed to remain at current charges (as implemented in November 2022) for existing season ticket customers for the first 12 months of the operation of emissions-based charges.
- 1.3.12 Charges for new customers will be linked to the emission of their vehicle. Appendix Bb provides an indication of the charges for season tickets based on current parking charges.



## 2 Public consultation

- 2.1.1 A public consultation was held to advertise the proposals for the Traffic Regulation Order over a 21 day period between 13 July 2023 and 3 August 2023 and publicised digitally via the Council's website; twitter account; press release; direct email contact to all statutory consultees and key stakeholders.
- 2.1.2 Notices of Intent were posted in all affected locations at tariff boards or points of public access to ensure that customers were informed of the proposals and had an opportunity to comment. Following feedback from previous consultations the Council also ensured additional and more engaging signs were installed across all affected locations helping to highlight the proposals to customers. This is shown in Appendix Dd.
- 2.1.3 The council took a proactive approach to engagement and issued direct communications (where contact details were available) to many groups including:
- a) 18,700 emails and 680 SMS messages sent to customers that had recently used the MiPermit service to pay for parking in Council car parks.
  - b) 8,100 emails sent to permit holders.
  - c) Banner placed on the MiPermit service for new customer to be made aware.
- 2.1.4 A web-based questionnaire was developed to seek the views from all stakeholders on the proposals.
- 2.1.5 Respondents were directed to the online consultation form to provide their feedback or could be provided with a paper copy to complete and send in upon request.
- 2.1.6 A dedicated mailbox was made available for stakeholders to use where they required clarification on any element of the proposals.

## 3 Consultation Response

### 3.1 Feedback generated

- 3.1.1 The online survey generated a total of **1692** individual responses, with one of these being by email/post and being entered into the online survey. The last price review for council car parks generated less than 10% of this level or response, which emphasises the positive impact of our more proactive approach.
- 3.1.2 The consultation analysis has involved both quantitative and qualitative data. Quantitative data was gathered through single answer questions producing numerical results. Qualitative data was gathered through additional comments to support the respondent's choice or add additional comment.
- 3.1.3 The primary consultation question was focussed on whether a respondent supported, partially supported, or objected to the proposals.
- 3.1.4 Respondents were also asked:
- a) How concerned they were about air pollution and the impacts on people's health.
  - b) How important tackling and improving air quality is to them.
  - c) How often they used council car parks.
  - d) How often they used on street parking.
  - e) How often they used the council's Park and Ride service.
  - f) How often they purchased season tickets for council car parks.
- 3.1.5 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.
- 3.1.6 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.
- 3.1.7 Due to the complexity of the proposed emission-based charging structure the consultation was used as an opportunity obtain additional feedback from respondents on three draft tariff signs proposed for car parks should the new charges be implemented. Common themes identified within this feedback will be used to ensure the final designs display the necessary information to customers as clearly as possible.
- 3.1.8 No feedback was received on the proposal to reintroduce the Holburne Museum car park into the TRO, which it should be noted reflects the current operation of the museum car park.

## 4 Consultation Responses

### 4.1 General Characteristics

4.1.1 The on-line survey asked respondents to provide general information relating to characteristics. The results are provided Figure 1 to Figure 2.

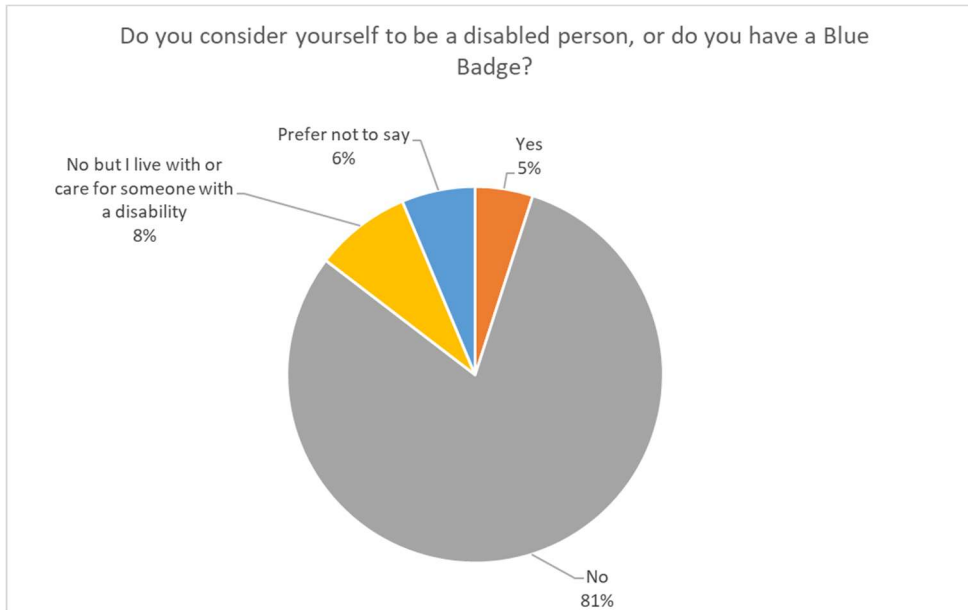


Figure 1 – Respondent disability status.

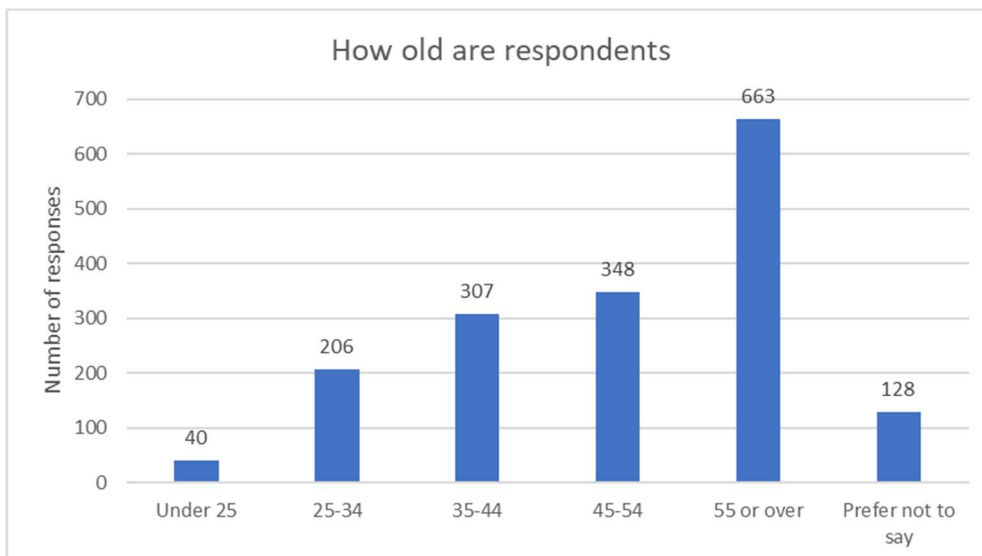


Figure 2 – Respondent age.

## 4.2 Response distribution

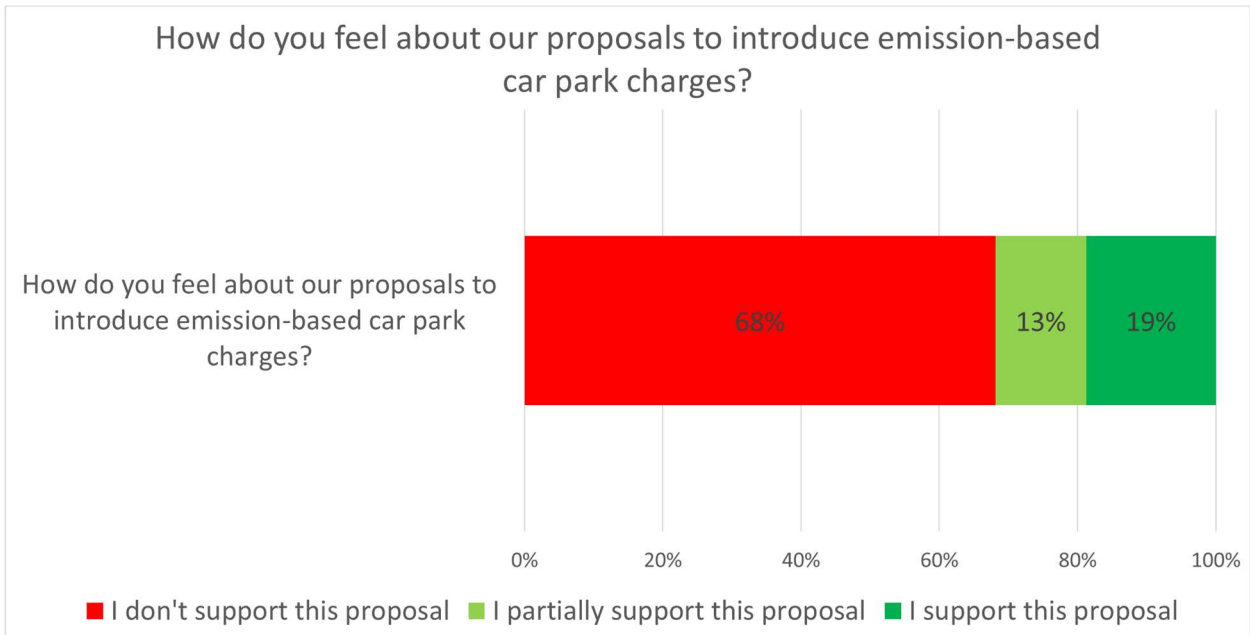
- 4.2.1 The majority of responses were from individuals that could be identified as living within the Bath & North East Somerset area (83% - 1409 responses).
- 4.2.2 Of the remaining 17% (283 responses), 16% (278 responses) lived outside of Bath & North East Somerset and <1% (5 responses) did not provide sufficient data.
- 4.2.3 Figure 2 indicates that 60% of respondents are over the age of 45 with 39% over the age of 55.

The 2021 census indicates that 57% of the B&NES adult population (excluding those aged 0-19) are over the age of 45 and 41% are over 55. These results indicate that the high response rate is broadly proportionate across the population of B&NES.

- 4.2.4 Analysis of consultation page view analytics shows a total of 8,619 page views during the consultation period, of which 6,474 identify as unique visits, i.e., those from a different person or internet address. The average time spent viewing the page is 1:04 minutes.
- 4.2.5 With 1692 responses, 26% of people who viewed the consultation page (counting unique views only) went on to submit a response. The low page view time suggests many users went straight to the survey or did not spend long reviewing the material presented and is highlighted by some of the inaccuracies in key comments included within section 5, which are contrary to information published in the consultation documentation.

## 4.3 Presentation of results

- 4.3.1 Figure 3 shows the breakdown of the **1692** responses received. A combined **32%** (**539** responses) were supportive or partially supportive of the proposals, compared to **68%** (**1153** responses) who objected.



**Figure 3 - Respondents results to the emission-based charge proposals.**

4.3.2 A higher proportion of objections is not an unexpected result given that increased parking charges for more polluting vehicles is the mechanism itself to encourage behaviour change amongst motorists to incentivise them not to bring them into the city centre, but to use more sustainable alternatives. Parking is an emotive subject for many people and increases in any charges is never a popular option for customers, even where many may recognise the outcomes and benefits that this form of behaviour change is designed to encourage.

The council recognises the cost-of-living crisis and is sensitive to the current pressure on families, and whilst these proposals mean higher charges only apply to drivers of more polluting vehicles, they nevertheless come at a sensitive time.

It should be noted that analysis of current customer vehicles indicates that 34% of customers will see no change to their parking charges based on these proposals.

4.3.3 Further analysis was undertaken on responses to identify the area that respondents live. The full results of this analysis are shown in Appendix Ee. For ease of review these wards have been aggregated into the following groups which have been based loosely on the areas covered by the Off-Street Traffic Regulation Orders:

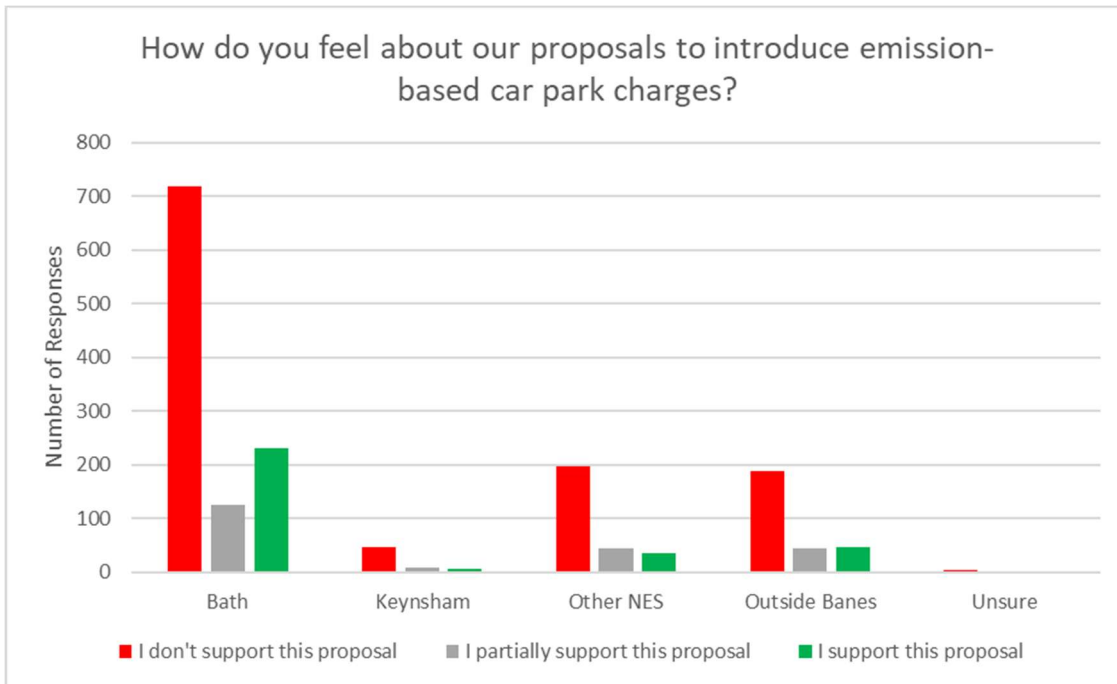
- a) Bath area wards
- b) Keynsham area wards
- c) North East Somerset area wards
- d) Outside B&NES
- e) Unsure – note this represents less than 10 responses and is not considered significant.

4.3.4 This aggregated group data is shown in Figure 4 and shows a much higher response rate from respondents living within Bath, where the affected car parks are based, with 60% of responses in total. This is unexpected as typically these car parks are provided for commuter and short stay visitor parking into the city centre.

More detailed analysis of this data shows that 12.5% of all respondents (211 in total) live within the council's central Kingsmead Ward, with 149 of these responses (9% of the total) not being in support of the proposals.

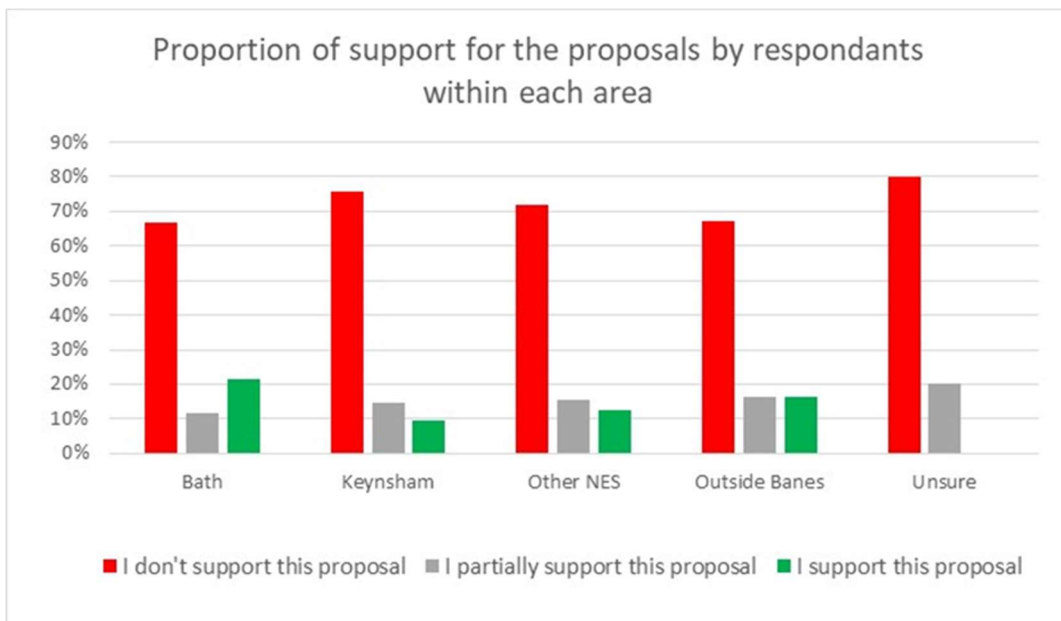
This suggests a link to the consultation page review time detailed in paragraph 4.2.4 and 4.2.5, with some respondents not fully considering the details included within the proposals. It also suggests that many Bath residents continue to use city centre car parks, rather than other forms of travel, to make short trips of under 2 miles long across the city centre.

It should be noted that respondents from the Kingsmead ward may have objected to the proposals as they have no off street parking for their property and may not be entitled to an on street parking permit, instead being required to purchase a season ticket for a council car park. Residents that purchase a season ticket for their personal parking needs will be exempt from the new charges for 12 months.



**Figure 4 - Respondents results to the consultation question by aggregated area.**

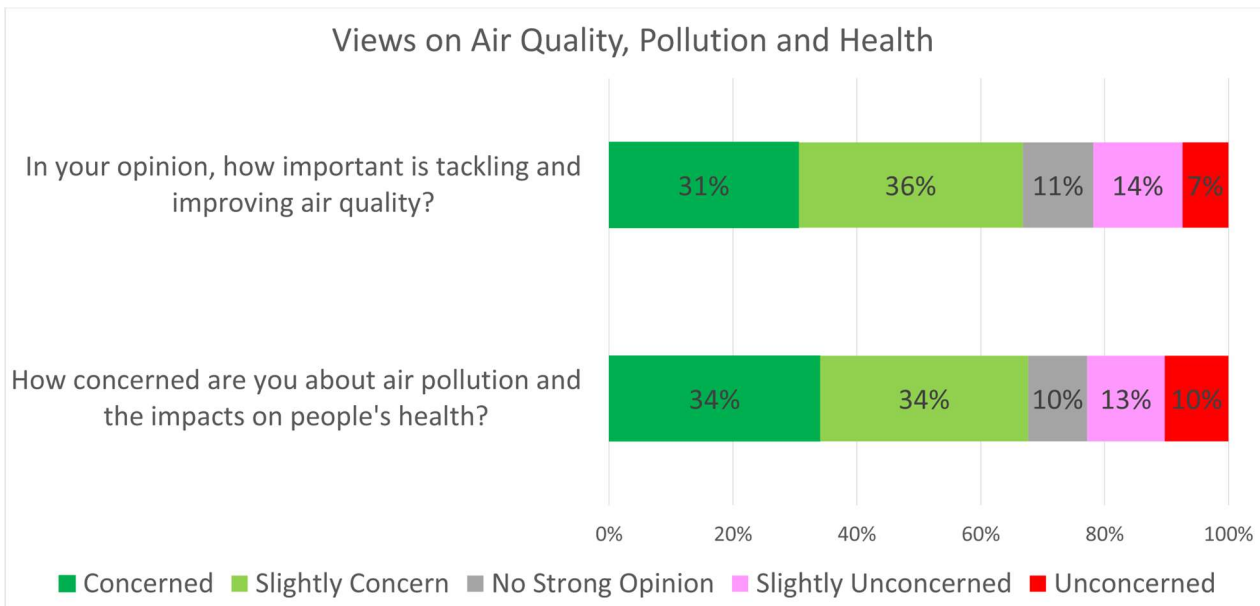
4.3.5 The analysis of the proportion of responses to the proposals by area (by the total number of respondents within that area) is shown in Figure 5, with little variation in the levels of support. It's noted that respondents from Bath were nominally more in support of the proposals (as a proportion of responses) compared to other areas, noting that the emission-based charges will only apply to council car parks in Bath.



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

4.3.6 The views of respondents regarding the importance of air quality, air pollution, and its impacts on health are shown in Figure 6. 67% of respondents felt action was required to improve air quality with 68% stating that they were concerned about air pollution and its impacts on health.

This contrasts with their views on the proposals themselves and demonstrates that there is significant overlap between those respondents that objected to the proposal but who are also concerned about air quality and its impacts, these being the objectives of these proposals.



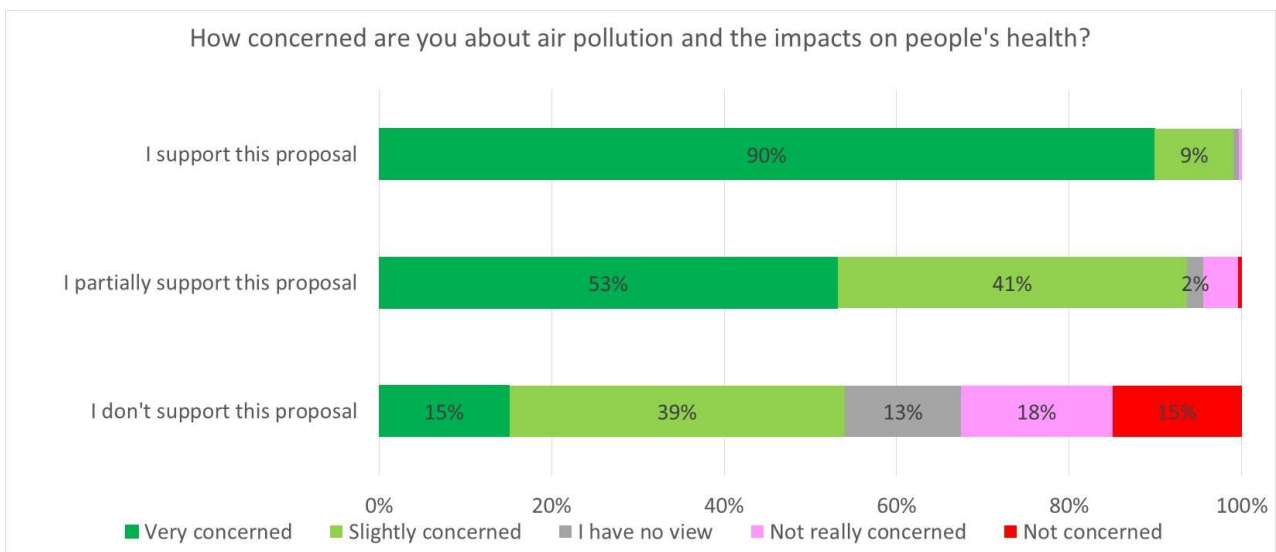
**Figure 6 - Respondents views on air quality, air pollution and its impacts on health.**



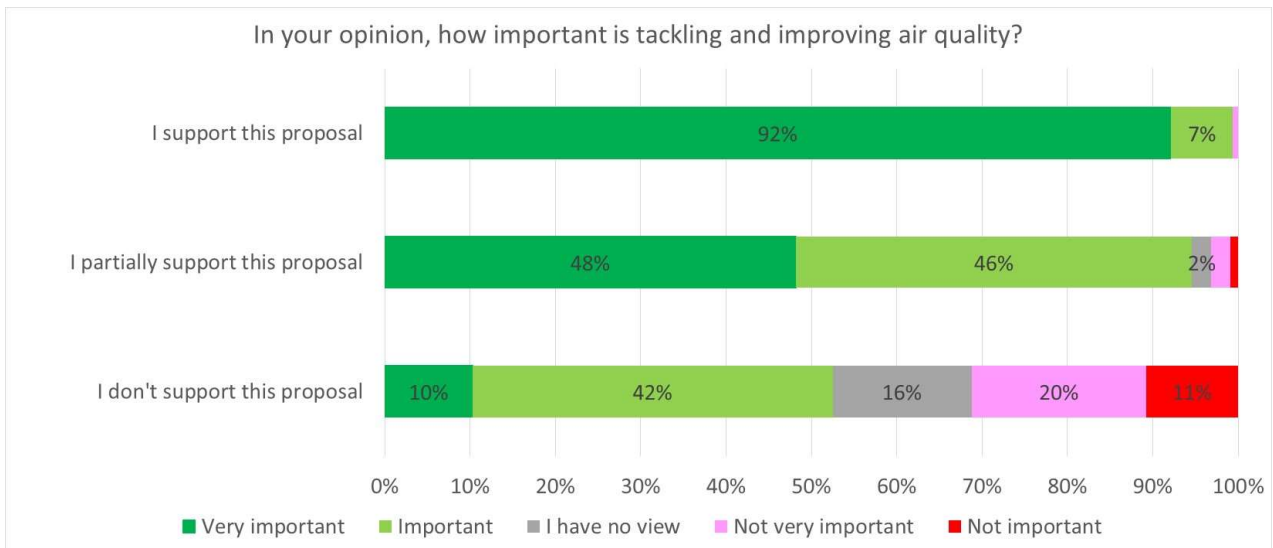
4.3.7 Figure 7 and Figure 8 present the respondents level of support cross referenced with their views on air pollution, air quality and its impacts on health. Those that support these proposals are not surprisingly very concerned about these issues and believe it's important that action is taken.

When the views of those that do not support the emission-based charge proposals is examined in this same way the data shows that 54% are concerned about air pollution and its health impacts, and 52% having the view that we should be taking steps to tackle these problems, reflecting a majority of respondents in both cases.

4.3.8 This contrasting overlap suggests that a significant proportion of the 68% of respondents that objected did so based on other factors, such as price sensitivity. It's acknowledged that these proposals may result in additional revenue being generated from drivers that choose to continue bringing their more polluting vehicle into the city centre; however, this is not the objective of the proposals. This is explored later in this report within the qualitative analysis of respondent's feedback.

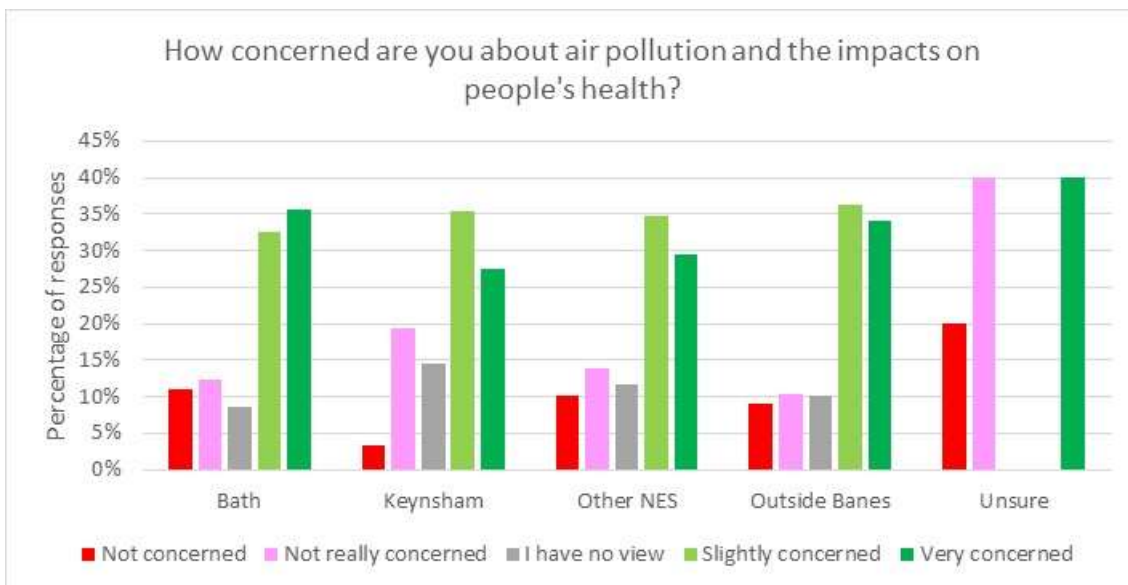


**Figure 7 - Respondents views on air pollution and its impacts on people health grouped by support for the emission-based charge proposals.**

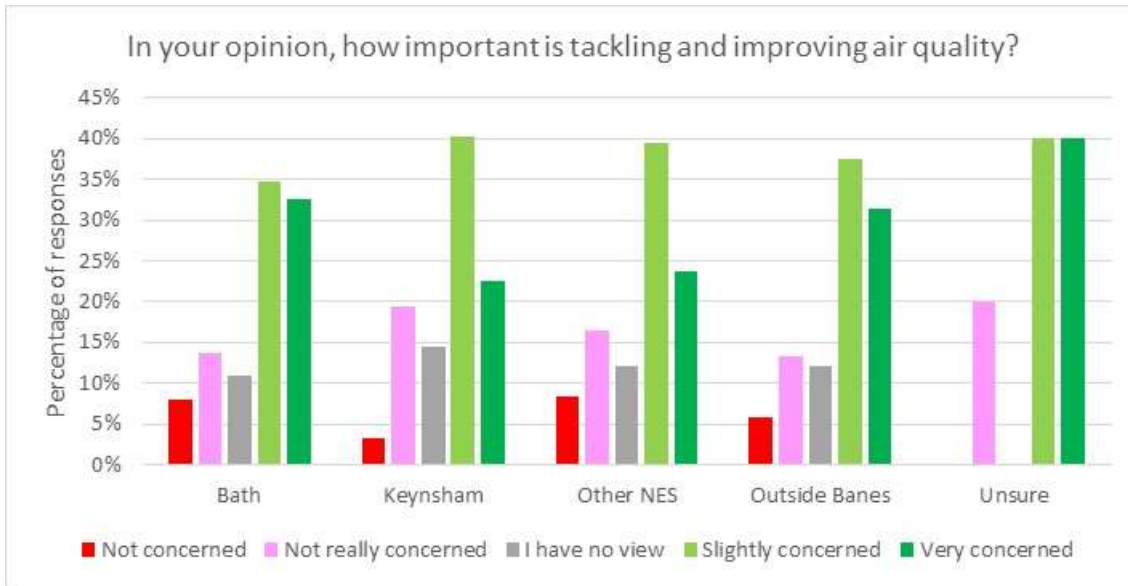


**Figure 8 - Respondents views on the importance of improving air quality grouped by their support for the emission-based charge proposals.**

4.3.9 Further analysis of views on air pollution, air quality and its impacts on health based on area are shown in Figures 9 and Figure 10. These results show no significant variation in the distribution based on where respondents live, suggesting this is not a factor in their response choice.



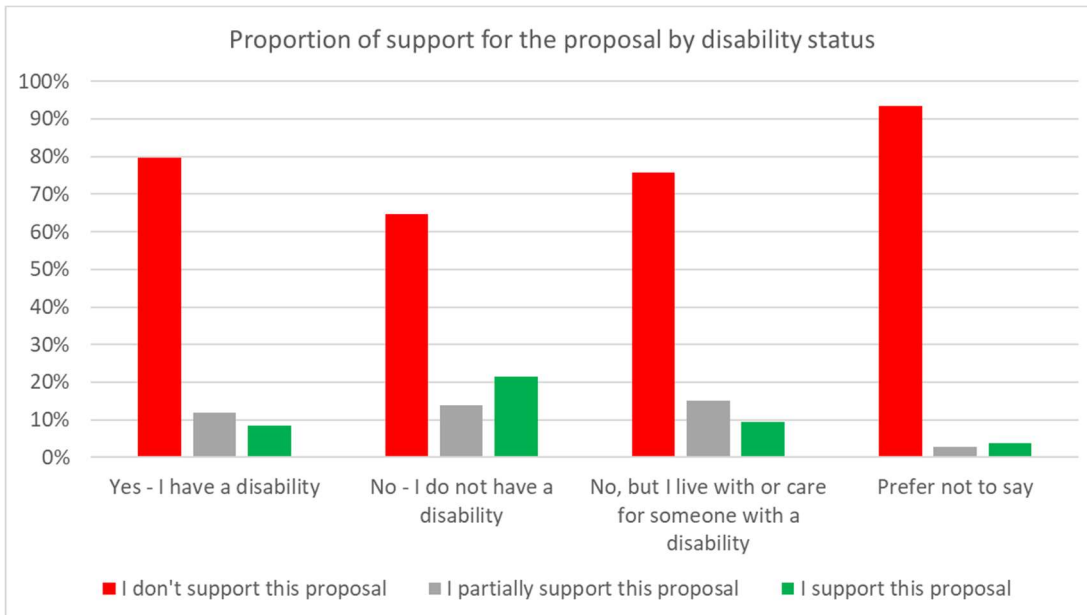
**Figure 9 - Respondents views on air pollution and its impacts on people health grouped by support for the emission-based charge proposals by area.**



**Figure 10 - Respondents views on the importance of improving air quality grouped by their support for the emission-based charge proposals by area.**

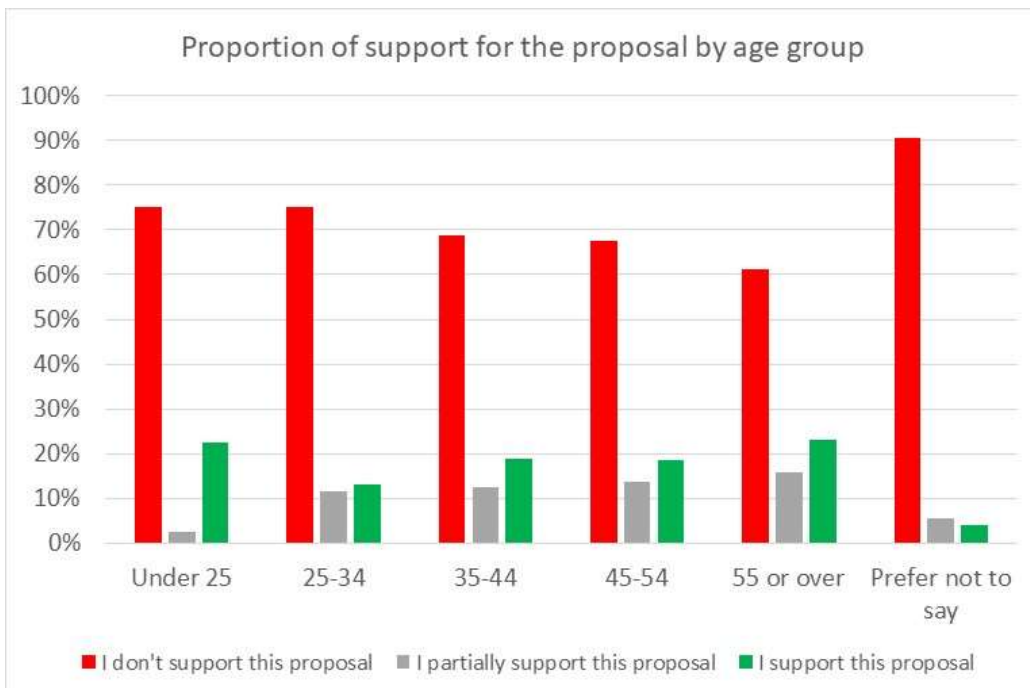
4.3.10 Analysis of the proportion of support (by the total number of respondents within that age group) to the proposals across declared disability status is displayed in Figure 11. This shows no significant variation in distribution across each respondent group. However, it can be noted that the support for the proposal was lower amongst respondents that had a disability or lived/cared with someone who did.

4.3.11 No feedback was received that identified or highlighted that these proposals could have a negative or adverse impact on an individual or group in accordance with the Equalities Act 2010. An Equalities Impact Assessment (Appendix Cc) was published as part of the consultation documentation and reviewed following analysis of the feedback.



**Figure 11 - Proportion of support for the proposals across each disability status.**

4.3.12 The proportion of each age groups support to the proposals (by the total number of respondents within that age group) is displayed in Figure 12 and shows no significant variation across each age group.

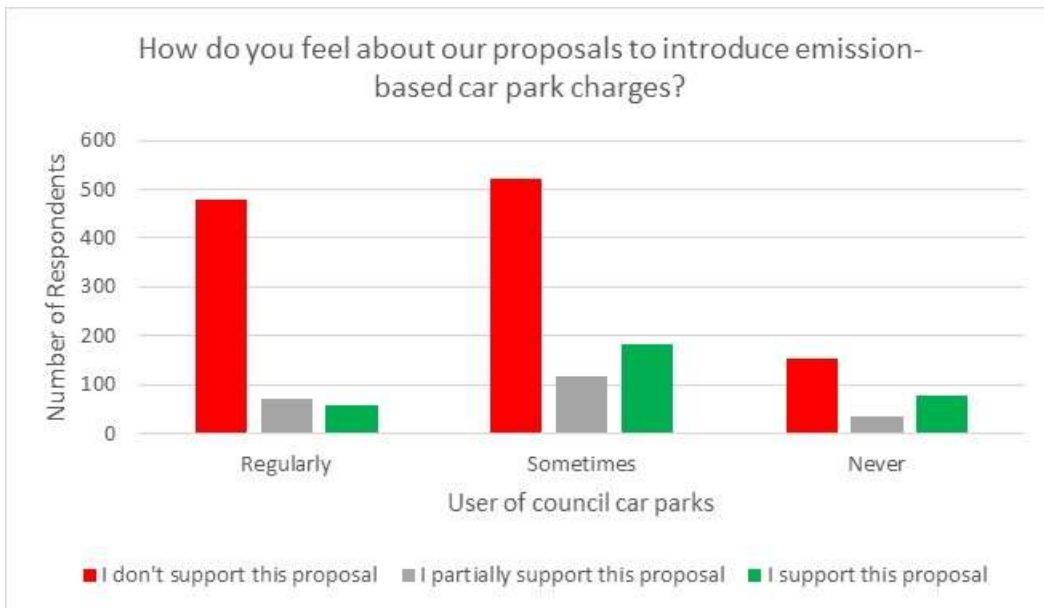


**Figure 12 - Proportion of support for the proposals across each age group.**

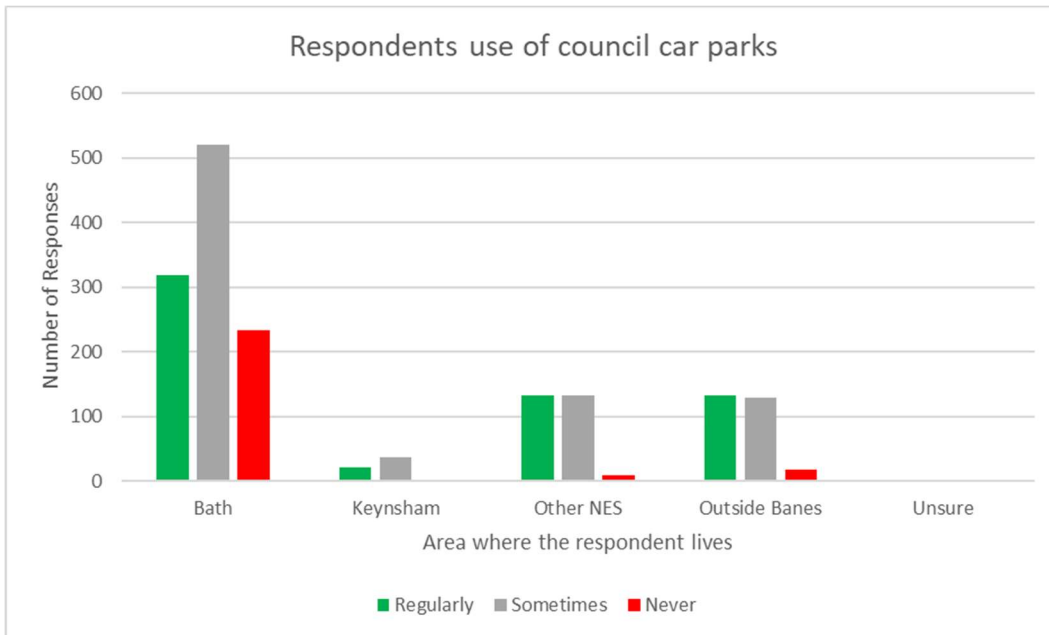
4.3.13 Figure 13 shows the responses cross referenced against respondent use of council car parks. Unsurprisingly, given the high number of respondents that don't support the proposals, 84% of respondents use a council car park and therefore may be subjected to higher charges if their vehicle is more polluting.

This indicates that the feedback is skewed towards car parks users, who are more likely to be impacted by a higher charge, and therefore more likely to be price sensitive and object on this basis. This is relevant given the results identified in paragraphs 4.3.6 to 4.3.8.

4.3.14 Analysing the results from car park use against the data showing where respondents live (Figure 14) show that whilst Bath provided the most responses (paragraph 4.3.4 and Appendix Ee), they are also regular and occasional users of the city centre car parks, contributing to air pollution congestion and for relatively short journeys.

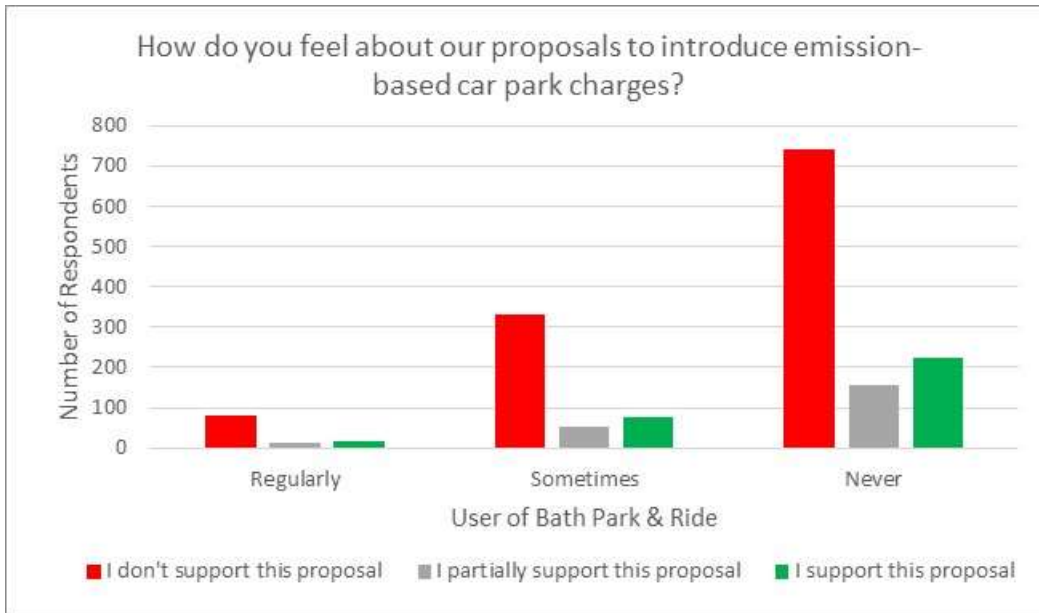


**Figure 13 - Respondents that use Bath car parks views on the proposals.**



**Figure 14 - Respondent use of council car parks grouped by where they live**

4.3.15 When respondent use of park and rides was cross referenced (as shown in Figure 15) against their support for the proposals, the reverse position to car park users is shown with respondents that indicate they never use park and rides being overwhelming against the introduction of emission-based charges. These proposals of course seek to incentivise car users, and particularly those with more polluting vehicles which will experience the higher charges, to not bring their vehicles into the city centre and use council car parks, and into the more sustainable park and rides. Noting that increased park and ride use further supports its long-term viability and allows for the consideration of additional options which may include extended hours of operation.



**Figure 15 - Respondents use of Bath Park & Ride services and their views on the proposals**

## 5 Consultation Responses – qualitative analysis

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

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

### 5.3 Proposal: The introduction of emission-based variable parking charges for Bath car parks

5.3.1 Theme: *Air quality & driver behaviour*

#### **Key Comments**

- *It should discourage the most polluting vehicles from driving into Bath.*
- *Clean air should be a basic human right. On a personal level, I suffer from asthma made worse when spending time in the city centre, and around busy junctions.*
- *For too long, too little has been happening about protecting the lives of our children from the pollution That is just so abundant in our cities. As a medical doctor, I fully support this action to help clean up our murderous polluting skies.*
- *Quality of clean air is important. The new charges for residents' permits reflect the vehicle emissions so it is logical for the car parks to do the same.*
- *It's obvious particularly in the summer how poor the air in the centre of Bath is, one of my children suffers from hay fever and as we walk into town you can see/hear the symptoms come on.*
- *I am really concerned about air quality and the potential impacts on my young daughter. I believe this sort of measure is an important and necessary step to nudge people towards less polluting modes of transport.*
- *Collectively, all car owners and drivers must take responsibility for the pollution our vehicles produce. People, especially children suffer from poor quality air.*
- *I don't think Bath has an emissions problem. Emissions don't cause the health problems that you state. CO2 isn't the problem that the media and government make out.*
- *Given that the air in the city has now improved and is within the targets previously set this doesn't seem a necessary step.*
- *What is your evidence that car park emission charges reduce pollution and improve air quality?*
- *Link between air pollution, health and cost to health services is clear and evidenced. Providing an incentive mechanism to encourage switch to healthier can only improve outcomes. Fully support this.*



- *There needs to be a cultural change when the car is not the first considered mode of travel simply because of convenience when active travel solutions and alternatives are available for the wider benefit of wider health and personal fitness.*
- *A smart and simple way to encourage people to take public transport where possible and reconsider their car choice.*
- *It will encourage people to use the P&R facilities, thereby reducing the number of cars entering the city, which can only improve the quality of the air. Also, less cars in the city = improved traffic flow = less cars idling in queues.*
- *Get your car club operator more involved to help change behaviour.*
- *They will have no impact on whether people use their cars or not to travel into Bath - people mostly do it because they have/need to. It also doesn't help persuade people to move to cleaner cars - the well off with the biggest polluting cars won't worry about the extra charges and the less well-off won't be able to afford to change to low emissions cars and are more likely to have older cars currently.*
- *I do not believe it will change behaviour and will thus just be an additional tax. I use your car parks for my business, and it will not affect my behaviour apart from maybe seeking out private car parks in Bath which will do nothing to improve air quality.*
- *We already pay more road tax based on emissions. The car is not emitting anything whilst parked so this makes no sense. The public transport system is useless so driving is the only option, and this is a war on the motorist which must stop.*
- *Like many other communities close to the city centre, our area suffers from the excessive air pollution, traffic and congestion that is generated by the ingress of traffic into Bath. In our opinion, to secure necessary improvements in congestion and air quality within Bath, it is clear that where possible cars driving into Bath (whether arriving from nearby towns, villages/rural areas or further afield) should be expected to make use of the city's Park and Ride sites.*
- *This penalises specifically on emissions and not how people are car sharing.*
- *The charges are linked to CO2 emissions rather than toxic emissions (NOx). CO2 affects global warming but not localised pollution. So it won't have the desired effect. You should do it based on NOx and particulate emissions.*
- *This has no effect on the overall air quality, rather, just makes poor people poorer.*
- *Air quality in Bath is fine, we're a tiny town ("city") with significantly less pollution than anywhere else already. Please focus your time elsewhere other than gentrification as there are many more significant issues in Bath such as drug abuse and homelessness.*
- *If you look at the full environmental impact of making a car you are better off keeping your old vehicle until it dies than buying a new electric one and this doesn't even look at the human rights issues behind electric batteries.*
- *Encouraging people to buy an electric car rather than an existing perfectly serviceable older car is environmentally unsound.*

- *The scheme totally fails to account for vehicle weight and its impact on non-exhaust PM emissions. This is a major oversight. Brake, tyre and road surface wear are arguably already the greater contributor to local air pollution.*
- *Also, if BANES was seriously concerned about healthy air it would not be allowing large polluting vehicles crossing Bath via London Rd, across Cleveland Bridge, through Widcombe and past Widcombe Primary School.*
- *Huge red tourist buses are so often nearly empty yet left to pollute our city*

### 5.3.2 Theme: **Costs & Affordability**

#### **Key Comments**

- *I think you do not go far enough. The charges should be higher than proposed.*
- *People will not volunteer to pay more so it is the socially responsible thing to impose it ensuring any monies raised goes towards subsidising public transport.*
- *Only effects Bath residents, not other areas of BANES. To make it fair, I propose that all car parks in BANES adopt these measures. It would reduce emissions in the whole of BANES and help the finances of the council*
- *I feel like I am being forced out of my city I grew up in because I cannot afford to live or work here anymore.*
- *There was a large increase in parking charges in Bath only recently, which has made parking unaffordable for many already.*
- *I am a carer on minimum wage so this will impact me greatly along with the cost of living.*
- *Given the current climate, you are victimising people for choices they've already made with their current cars, by charging more when they are in a cost-of-living crisis.*
- *I feel this is just a council scheme to get money and is discriminating against lower paid car owners who can't afford new cars and need their cars for work or health reason. Total disgrace.*
- *You say that there's only a 'modest' increase for higher emission vehicles, but NOBODY believes that you won't ramp them up once you've conned people into agreeing to this.*
- *I think this is designed to increase Council revenue rather than do something that is ethically sensible.*
- *Bath clean air policies are all about penalising people and raising money, rather than putting in place well thought out alternatives to encourage action.*
- *It's just a blatant money grab by BANES council. You are going to destroy the high street shops if you keep levying charges on potential customers. You already have the clean air zone. That should be enough!!*
- *It does not state how the additional income will be spent - it must be tied to environmental or Road improvements.*

- *It is just another tax on residents without any incentive to replace cars and to throw away cars that are perfectly usable.*
- *Increase for polluting, decrease for less polluting. You need to provide the reward and the penalty not just the penalty.*
- *Consider that Bath residents should not be included in additional car parking charges. However, visitors/tourists to Bath should be charged the additional amount if using Banes run car parks.*
- *Improving air quality is important but penalising people, especially residents, for using vehicles they already own is unfair. It would be extremely expensive for people to change their cars without some sort of scrappage support from the government/ BANES.*
- *The policy I'm seeing here is "If you cannot afford a new car, or you live in a rural area, we don't want you to come to Bath".*
- *How do you expect struggling families to pay these charges, you are forcing them into even more poverty. Not everyone can afford new vehicles. Totally disgusting*
- *It would be far better to let this issue be solved in time, which it undoubtedly will be as people sell their older, more polluting cars.*
- *I own a VW diesel Golf so this will affect me, but I strongly agree with what you are proposing. However, I would also like to see people charged more for taking up more parking space, such as Range Rovers, as well as for owning cars that have a greater environmental impact in their very production, and by weight as they tend to inflict more damage on the roads as well as adding greater indirect pollution via tyre wear etc.*
- *I drive a large diesel pickup truck and I understand why I should pay more. It's my choice.*

### 5.3.3 Theme: **Vehicles**

#### **Key Comments**

- *Modern diesel engines do not contribute to air pollution but are wrongly targeted.*
- *If you really want to generate more money by variable parking charges, they should depend on potential for actual pollutants and that is determined by the age of the vehicle and the Euro criteria. So, Euro 6 vehicles petrol and diesel, should not be charged extra.*
- *Vehicles fitted with AdBlue reactant are designed to reduce the harmful NOx emissions that are emitted via vehicle exhaust into the local atmosphere. The efficacy of AdBlue is that up to 95% of CO2 emissions are reduced from engine emissions before they hit the atmosphere. This therefore means that taking a manufacturers engine size alone fails to address the fact that the vehicle has also been fitted with emission reduction technology - at source - which this proposal is supposed to be supporting.*

- *Many people followed advice and bought diesel, and it looks like you will punish them.*
- *The proposal does not appear to have considered the impact for Historic Vehicles. These travel much shorter distances per year than modern vehicles, so emit less CO2.*
- *With the current proposals, even historic vehicles with the smallest engines will pay more than now. This seems unfair. Paying the same as now would be much more reasonable, especially as the lower whole life CO2 emissions of such vehicles enable them to be exempted from all clean air zone changes up and down the UK which shows that this argument has merit.*
- *Electric vehicles are prohibitively expensive.*
- *I note that you have not made it free for "non-polluting" electric cars to park. Why not, if they are so clean and the point of the increase is to stop non-electric cars being used in Bath.*
- *Electric cars are not all good, the battery waste causes environmental issues as well as air pollution from braking and tyre wear.*
- *There are not nearly enough electric charging points in Bath.*

#### 5.3.4 Theme: **Public transport, Traffic and active travel**

##### **Key Comments**

- *Bus travel from regions outside of the city are infrequent, slow and expensive compared to driving in. Rather than penalising drivers, focus on providing a realistic alternative.*
- *Until public transport is reliable, frequent and fairly priced it won't encourage people to NOT use their cars.*
- *People often drive into Bath and park in the evenings as there is no suitable alternative transport.*
- *I feel with the cuts to bus services in the city as well as rurally there is too much reliance on public transport as mitigation. Walking and/or cycling are not always appropriate alternative for everyone for every journey.*
- *I run a business and staff struggle to get in to Bath due to infrequent bus services - they can't now park as they have been priced out.*
- *It seems like the council are continuously doing what they can to encourage people not to visit the city. Yet they seem incapable of having a park and ride available from the west of the city.*
- *More needs to be done to encourage park and ride use - the charges and opening/closing times need to be reviewed to take into account shift start and finish times particularly in retail in the city centre.*
- *Some cities have late night busses and tram systems making it easy for people to get in and out of town, key factors to me are frequent, safe, and cheapest option and air pollution will improve in Bath else I'll keep driving my car to town.*

- *Park and ride can be more expensive than parking if there is more than one person in the car.*
- *This proposal only makes sense if implemented alongside meaningful travel alternatives, such as affordable bus tickets - it can't cost £16 in bus fare for a family of 4 to take a round trip into town.*
- *I would cycle more but the facilities for bikes and lack of cycle lanes is prohibitive. Families don't feel cycling is very safe in the city so people do not feel encouraged to cycle. There should be a commitment to creating a safer cycling landscape on the city. This is totally pollution free.*
- *The proposal should be balanced by the introduction of secure ideally monitored parking for cycles.*
- *The city centre is already easily accessible by bike/walking/bus so most people don't need to drive. The proposal should discourage unnecessary driving in the city.*
- *If you want to improve pedestrian safety, here are some suggestions: - introduce policies that restrict car movements- policies that make active travel safe and attractive. Ban pavement parking and enforce it. Increase on-street parking charges, provide better quality segregated cycle infrastructure that connects places. - introduce a workplace parking levy, a supermarket parking levy*
- *The emissions are caused by the constant traffic jam in the city with poorly designed traffic layouts and overuse of traffic lights every 100 metres or so.*
- *If you want to reduce air pollution, let traffic move at 30mph on roads in and out of Bath, instead of 20mph which makes all cars inefficient*

### 5.3.5 Theme: **Payment and technology**

#### **Key Comments**

- *A pay by contactless/cash machine should always be the default with internet apps as an extra option. Not everyone uses mobile phones with internet, and even the majority that do regularly find it difficult to get data when in Bath city centre.*
- *And I find it outrageous that there are no credit / debit card payment facilities that would make life much easier for all who need to park in Council Car parks just like it used to be,*
- *There must always be the ability to use cash - and not frustrate people having to use computers that don't always work and waste their time.*
- *This proposal will also lead to parking charges that are not clear as drivers often will not know they're vehicle emissions.*
- *The parking app MiPermit is often not working due to lack of Internet and this already causes confusion and frustration.*
- *Forces entry of number plate in machine, complicated and potentially unfair for EU visitors to Bath*

### 5.3.6 Theme: **Season tickets**

#### **Key Comments**

- *I see this as a way to simply increase charges after the huge increase for season ticket holders last year.*
- *The monthly parking charge has already doubled, with a cost-of-living crisis people can barely afford food let alone a new car.*
- *Removing the ability for season ticket holder businesses to change registration is just obstructive.*

### 5.3.7 Theme: **Clean Air Zone**

#### **Key Comments**

- *It would be better to focus efforts on moving to a Class D CAZ and keep parking charges the same for all vehicles.*
- *Any vehicle that meets the requirements to drive within the Bath Clean Air Zone without charge already meets an acceptable standard for CO2 emissions. On that basis, there is no further justification for increased car parking charges.*
- *I thought the Clean Air Zone was supposed to achieve improved air quality. If you need to make it more restrictive to achieve those ends, you should do that first.*

### 5.3.8 Theme: **Business, commerce, visitors, and tourism**

#### **Key Comments**

- *It's another reason not to visit the city for shopping as we already have local shops outside of the city which is bad news for traders.*
- *Tradesman cannot use public transport to earn their living nor can they make fewer journeys. If tradesman do pay higher charges, it will mostly be passed onto residents.*
- *I understand why you are planning to implement these proposals, but there is little consideration of the impact on the businesses within Bath and those professionals who often require vehicles for site visits outside of the city.*
- *We have no option to not bring our cars into the city, they are an essential part of how we get from the office to our client viewings in the surrounding villages and rural areas and our hands are literally tied.*
- *Perhaps a fairer scheme would be to have a timed approach so that business vehicles can have a certain number of visits a month relating to resupply operations.*
- *Parking costs in Bath are already prohibitively high, this will discourage visitors even more.*

- *Bath is a tourist destination, and we should do nothing to deter visitors and where necessary, their mode of transport.*
- *Footfall in Bath will be reduced affecting shops and tourism.*
- *You need to treat foreign visitors who drive here more fairly than just charging them the top rate.*

### 5.3.9 Theme: **Equalities, disability, and care**

#### **Key Comments**

- *I am concerned that emissions-based parking charges will adversely affect those with socio-economic disadvantage; this disproportionately affects older people, women, people of colour, and with those with disability.*
- *You state in the equalities impact that people have a choice to park in other car parks but at certain times these car parks are full so there is no choice.*
- *I think additional charges for more polluting vehicles is an appropriate policy. However, it will disproportionately disadvantage those people who are not classed as disabled but who have difficulty in walking. Generally, these individuals are older, less well off, but need to be closer to their destination.*
- *BBH spaces have been reduced significantly during shielding. This will force more BBH into the car parks and you are now hiking up the prices.*
- *I suggest that people with blue badges who often, like us, have no alternative to driving into town, should be able to register with the Council and be exempt from these additional charges.*
- *As a blue badge holder who cannot use the bus or afford a new car it will negatively impact me.*
- *There should be an exemption for those working in care. This could be a pass given out by the local authority to allow carers to park in residents parking and car park for free or at a highly subsidised amount.*

### 5.3.10 Officer Response

- a. As set out in section 1 of this report, the emission-based variable parking charges have been developed to facilitate the strategic outcomes of local transport policy and align with the Council policy on Liveable Neighbourhoods and the Journey to net zero. By reducing congestion on our roads, we aim to improve public transport journey times and improve air quality to secure the safer movement of pedestrian traffic, supporting increased take up of active travel.
- b. Improvements to public transport cannot typically be achieved by increasing the frequency of buses on an already congested network, further impacting the flow of vehicles, and discouraging motorists from switching away from private vehicles. This also serves to further undermine the viability of services by increasing costs without raising the revenue needed to operate them.

- c. Parking charges will always be emotive; however, they are a recognised and established mechanism to encourage behaviour change. These charges were last reviewed in 2018 alongside the adoption of the Parking Strategy 'Balancing your needs'. A further review was undertaken in 2022 and it should be noted that these current proposals will only apply to more polluting vehicles, with an estimated 34% of car park users seeing no change.
- d. Recent redevelopment within the historic core in Bath has seen changes to the availability of parking. The promotion of parking out of the city centre by prioritising sustainable transport such as the park and ride service (through increased city centre parking charges), ensures that the city, as a popular visitor destination and double UNESCO world Heritage site, remains accessible to all road users.
- e. The council recognises the cost-of-living crisis and is sensitive to the current pressure on families. However, we cannot ignore the need to act to progress measures which aim to improve air quality. These proposals only impact motorists with more polluting vehicles, incentivising them to use alternatives, such as our park and rides, which may also be more cost effective for them. This helps to improve air quality and the health of pedestrians and in particular vulnerable people whose health is at significant risk of harm by poor air quality.
- f. In urban areas where there is a lot of traffic, lower speeds such as 20mph can help traffic to flow more smoothly and at a more consistent speed, rather than frequently slowing down and speeding up.
- g. Clevedon Bridge carries the A36 which is a major strategic highway to the South with daily traffic of up to 17,000 vehicles. Without this crossing, all traffic would either route through the historic centre which are roads protected by access and weight restrictions or divert using roads to the east which would incur significant additional journey time. <https://beta.bathnes.gov.uk/cleveland-bridge-renovation-project/cleveland-bridge-renovation-project>
- h. The council has previously tried to introduce a permanent weight limit on Cleveland Bridge, but this was opposed by the then Highways Agency (now National Highways) and the Department for Transport told the council not to proceed with the proposals. There is currently a Temporary Weight Restriction in place while the bridge is being monitored.
- i. The level of traffic in the city at times exceeds the capacity of the roads and it is largely this that causes congestion. The traffic signals help manage conflicting movements at junctions for reasons of safety and to help keep traffic moving. These also provide essential safe crossing points for pedestrians.
- j. The council has taken a lead to reduce emissions along with WECA including oversight of public transport. Replacement council fleet vehicles must now be zero



emission, except where no EV variant is available, and much of its fleet is now already compliant with this requirement.

- k. Public electric charging points are available in the locality with more planned across the West of England. For example, the 'Revive' project has delivered 30 new electric charging points across Bath & North East Somerset in 2022 (<https://newsroom.bathnes.gov.uk/news/expansion-electric-vehicle-charging-points>). Additional information of Go Ultra Low West (GULW) is available at <https://travelwest.info/electric-vehicles/revive-charging-network/>
- l. It's true that electric vehicles still have associated emissions from manufacturing the battery and from electric generation. A study by the universities of Exeter, Nijmegen and Cambridge concluded that electric cars lead to lower carbon emissions overall. Researchers carried out life-cycle assessment which included the production chain and waste processing. <https://ore.exeter.ac.uk/repository/handle/10871/41003>
- m. We accept that over time more people will change to electric vehicles given Government directive for all new electric vehicles from 2030. The emission-based charge proposals aim to contribute to the improvement of air pollution now. These proposals do not seek to encourage people to change their vehicles if they were not already looking to do so, rather they aim to incentivise drivers of more polluting vehicles not to bring them into the city centre and to use more sustainable alternatives.
- n. Further appropriate infrastructure is needed to support electric vehicle charging. As part of proposals for Liveable neighbourhoods, the council undertook public consultation on an On-street electric charging strategy. This can be viewed in full at <https://beta.bathnes.gov.uk/sites/default/files/2020-09/DRAFT%20ON%20STREET%20EV%20strategy.pdf>
- o. In March 2023 the council approved the trial of three different charging cable channels which would be installed within the footway, offering residents an alternative to trailing cables across the pavement, which is prohibited and causes accessibility issues. <https://newsroom.bathnes.gov.uk/news/council-considers-trial-street-electric-vehicle-charging-cable-channels>
- p. These proposals relate to the council's off-street car parks in Bath only due to the air quality directive. Restrictions on the public highway are controlled by different regulations and therefore are not included within this proposal.
- q. The proposed charging structure for emission-based resident permits aligns with the Vehicle Excise Duty (VED), (commonly known as car or road tax) bands based on CO2 emissions, used by the DVLA. Charges will only increase for petrol vehicles that produce more than 130g/km of CO2 or use diesel fuel. You can find out your emission band online at <https://www.gov.uk/get-vehicle-information-from-dvla>.

- r. The 'differential' approach for payment of DVLA vehicle excise duty provides for different levels of charge. It has been in place for many years, is well understood and accepted as the basis for payment of vehicle excise duty. All motorists are able to check VED bands of UK registered vehicles online at <https://www.gov.uk/get-vehicle-information-from-dvla>. In contrast, the data on Euro emission standards is less consistent, less accessible and less understood generally. Noting the transition from September 2018 (following the high-profile emissions scandals in previous years) from the 'New European Driving Cycle' (NEDC) laboratory tests, based on theoretical behaviour, to 'e-NEDC' tests, which use a Worldwide Harmonised Light Vehicle Test Procedure (WLTP), which is based on real worlds driving data and not comparable to NEDC.
- s. This charging structure continues the same approach and principles that the council introduced to emission-based charges for on-street residents parking permits in January 2022, following engagement throughout 2021. This will help embed the new charging structure, which we acknowledge may be viewed as complex, as the principles are already established. This provides consistency across on-street permit parking and our car parks.
- t. Based on current customer transaction data for our car parks from MiPermit (capturing 72% of all transactions during the sample period), 1 in 3 vehicles will not be subject to any increased charges for their permit. Of those 2 in 3 vehicles, or 66%, that are expected to see a price increase, the average rise is equivalent to only 11p per hour.
- u. The average per hour charges quoted within the consultation documentation (£1.20 and £1.31 for current charges and those for more polluting vehicles respectively) are based on the total amount and value of parking purchased by all customers across a sample period in 2023, noting of course that the council operates a linear per hour charge except where the charge is for all day parking.
- v. The purpose of this average figure is indicative to highlight the impact of the proposals on average costs for motorists with more polluting vehicles, compared to our current charges or for those for motorists with less polluting vehicles.
- w. The actual additional charge will of course vary from customer to customer, based on their vehicle's emissions.
- x. It should be noted that only car park users with more polluting vehicles will pay higher emissions-based charges in Bath car parks for their daily paid for parking. These charges do not apply to other road users or those that deliver goods to local businesses (unless they park in a council car park).
- y. The level of charges proposed have been set to ensure that the most expensive charge falls below the amount of a Penalty Charge Notice, which is reduced by 50% for the first 14 days and were set in regulations enacted in 2006. If the emission-

based parking charges exceed this reduced amount (currently £25) then there is no incentive for motorists with more polluting vehicles to pay the charge.

- z. Whilst the aims of these proposals are not about raising revenue, it's expected that additional income will be generated as some motorists will choose to pay more for the convenience of parking a more polluting vehicle in the city centre rather than be encouraged to use alternatives. Surplus income raised from these car park charges is not subject to the same controls as on street income and may be used to fund council services. Surplus raised from on street charges must be applied for a purpose specified in section 55(4) of the RTRA 1984 and will be allocated to support the development of sustainable transport schemes in accordance with statutory obligations, such as Safer Routes to Schools.
- aa. Customers do not need to be familiar with their vehicle's emission data as the correct charge will be calculated for them based on their own vehicle when they provide their vehicle registration details into MiPermit or the council's pay and display machine.
- bb. The council will review its signage both in car parks and its website, working with partners such as Visit Bath, to ensure that advance notice of emission-based charges is available to help visitors be more informed and make appropriate travel choices, such as the park and ride, rather than travel into the city centre.
- cc. It should be noted that proposals are not designed to reduce CO<sub>2</sub> (which is a greenhouse gas not a pollutant) itself but uses established CO<sub>2</sub> bands as a mechanism to improve air quality by reducing other harmful pollutants from a vehicle's tailpipe. Increased CO<sub>2</sub> output from an engine is an indicator of increased combustion of fuel, and therefore other harmful by-products of combustion. It's commonly accepted that the burning of fossil fuels in internal combustion engines result in the production of harmful pollutants at the tailpipe and this is reflected in national and local policy (including the Bath CAZ and Residents Parking Permits).
- dd. 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 there is no attempt to justify these emission-based variable parking charges proposals on climate change grounds, it is anticipated that these proposals will also reduce the level of emissions that drive climate change. For example, as a result, of encouraging a switch to low emission vehicles.
- ee. Whilst the general aim of this proposal is aligned to the Bath CAZ, the improvement of air quality, it should be noted that the CAZ is only focussed on reducing NO<sub>x</sub> to below the legal limit of 40 µg/m<sup>3</sup>. CAZ charges do not apply to cars or motorbikes unless it is a taxi or private hire vehicle.
- ff. The council is committed to regularly reporting on the impact of the CAZ on air quality, traffic flow, vehicle compliance and other measures. These reports are

available online on the council's website at <https://beta.bathnes.gov.uk/policy-and-documents-library/baths-clean-air-zone-monitoring-reports>.

- gg. These proposals seek to improve air quality in the city centre through a reduction in all pollutants by incentivising motorists with more polluting vehicles to not bring their vehicle into the city centre and consider more sustainable alternatives instead. Whilst the level of charge may not in isolation be sufficient to change a person's behaviour on its own, it increases awareness of, and helps make the connection to existing vehicle and travel choices, their impact on air quality and people's health, particularly the health of vulnerable groups that are more severely impacted by poor air quality.
- hh. Whilst there is no direct evidence available to show that these proposals will improve air quality within the city centre, benefiting resident and visitors alike; charging mechanisms are a well understood demand management restraint tool linked to price elasticity.
  - ii. It's acknowledged that people will make vehicle choices for a variety of reasons to meet their needs and will continue to do so. This proposal does not seek to mandate vehicle change. In doing so, the proposal aims to help influence proactive choices for lower emission vehicles, when people decide to purchase a vehicle. It also aims for greater consideration of other more sustainable or active ways to travel, to reduce car usage and congestion across the road network. It should be noted that many respondents to the consultation, and particularly those that objected to the proposals, live within Bath or never use the Park and Ride, and it is these respondents that the proposals seek to influence to reduce unnecessary vehicle journeys within the city centre.
- jj. We are unable to influence the levy that motorists pay for their Road Fund Licence (vehicle tax) as this is set nationally. These proposals are therefore a mechanism to address issues of poor air quality and their health impacts locally where they arise.
- kk. Air pollution can cause or contribute to a variety of health conditions, particularly amongst the young and elderly. Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution which plays a role in many of the major health challenges of our day. It has been linked to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. The health problems resulting from exposure to air pollution have a high cost to people who suffer from illness and premature death, to our health services and to business. In the UK, these costs add up to more than £20 billion every year. Source: Royal College of Physicians – "Every breath we take: the lifelong impact of air pollution" <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>.
- ll. We recognise that vehicle weight and size also have an impact on the level of pollution a vehicle creates, both air pollution and particulates from brake and tyre

wear for example. The current data sets available to the council do not currently provide a consistent reference to provide a basis for charging using these variables. However, the council will continue to explore opportunities with suppliers when reliable data sets become available. There continues to be confusion amongst motorists between the Bath CAZ and emission-based variable charging (both for parking charges and on street permits) as identified within the feedback provided to this consultation. It's therefore key that we look to minimise unnecessary complexity within these proposals where they are complimentary to existing schemes. Aligning to the approach for emission-based permits meets this requirement. Where alternative charging mechanisms, such as vehicle weight or size, become available the council will review its approach and may propose changes across all appropriate schemes.

mm. Average new car fuel efficiency has generally increased over the past two decades, however, this trend reversed in 2016 as new cars became less fuel efficient driven largely by an increase in the proportion of SUVs and other large vehicles (source: DfT Transport Statistics 2019). Furthermore, Euro standard data on a per vehicle level is not available to councils to allow automatic validation of compliance.

nn. We acknowledge that some years ago, government policy was to encourage diesel vehicles as a more carbon-efficient fuel than petrol vehicles. We cannot ignore, that more recent evidence shows that diesel vehicles have harmful effects to health with higher emissions of NOx and particulate matter, which are now well publicised.

oo. We acknowledge that some motorists have taken conscious efforts to reduce harmful vehicle emissions through their choice of vehicle and whilst the new euro standards have ensured that diesel vehicles emit lower levels of NOx comparatively, they still emit higher levels of NOx and more particulate matter than petrol vehicles. The current Euro 6 emission standard for diesel vehicles registered from 2015 has a higher acceptable level of NOx at 0.08g/km compared to its petrol equivalent at 0.06g/km.

pp. AdBlue is a commercial synthetic product known as a Diesel Exhaust Fluid mixture which reduces NOx emissions by turning nitrogen oxides into harmless steam and nitrogen through a process known as Selective Catalytic Reduction (SCR). These systems are highly effective at reducing NOx emission by up to 90% and particulate emission by up to 50%, helping diesel vehicles meet the Euro 6 classification emission levels.

qq. We acknowledge that a parked vehicle doesn't generate emissions, however, the vehicle must be used and emit air pollution to reach the city centre car park. It's these emissions the council seeks to influence by encouraging drivers of more polluting vehicles to use more sustainable alternatives.

- rr. You can view our wider strategy for Liveable Neighbourhoods at <https://beta.bathnes.gov.uk/what-liveable-neighbourhood-0>
- ss. The council does not have resources to provide grants to support residents changing to less-polluting vehicles. Whilst grants are available in respect of compliance for the Clean Air Zone, this is provided via government funding, and is subject to eligibility.
- tt. There are financial incentives available from central government towards the cost of new electric vehicles and charge points, both for individuals and businesses - <https://www.gov.uk/plug-in-vehicle-grants>.
- uu. Arrangements for Blue Badge holders to access goods and services in central Bath remains an important consideration for us and is in accordance with our statutory Equalities duty. All on street pay and display bays and resident permit holder bays within the geographical area of Bath & North East Somerset Council are free to use by a Blue Badge holder providing a valid blue badge is clearly displayed. Additionally, and as part of the national Blue Badge concession, badge holders may park for up to 3-hours on yellow lines where no loading restrictions are in place, providing a valid blue badge is clearly displayed.
- vv. Other changes are taking place within Bath city centre for security purposes which restrict motor vehicle access to some roads within Bath city centre during the hours 10.00 to 18.00/2200. Additional work has been undertaken to consider some of the issues experienced by Blue Badge holders because of these road closures and to ensure alternative locations are available where a Blue Badge can be used for free on street parking. Further information can be viewed at <https://beta.bathnes.gov.uk/citycentresecurityworks>.
- ww. Exemptions are available to some restricted Bath city centre streets for Blue Badge holders with more information available online at <https://beta.bathnes.gov.uk/check-eligibility-and-apply-access-restricted-bath-city-centre-streets>.
- xx. An online map is also available to help Blue Badge holders find accessible parking within the city centre <https://beta.bathnes.gov.uk/media/4479>.
- yy. Medical permits and Social Care permits are available to formal and informal care provision for those that need it in their own home. These permits allow eligible people to park on street in permit holders' bays, rather than have to use city centre car parks. These permits cost £100 per year (£0.27 per day), with more information available online at <https://beta.bathnes.gov.uk/apply-medical-or-social-care-parking-permit>.

- zz. Disabled parking bays that are free for Blue Badge holders are located on the approach to the main car park area at Charlotte Street car park.
- aaa. The council previously provided a Residents Parking Saver 10% discount for on and off-street parking, introduced in 2018. This was removed from on-street parking charges in January 2022 and off-street parking in November 2022, as the discount disincentivised motorists from using other more sustainable forms of transport, such as the park and ride.
- bbb. Reduced parking charges are not proposed for electric vehicles. Whilst significantly better for the environment during use they are not resistant to producing airborne pollutants. This includes for example particles released from brake and tyre wear and road dust disturbed by a vehicle's motion regardless of the vehicle type or it's mode of power. Whilst emissions from EV vehicles on the road are significantly less than other vehicles, they still contribute to congestion and the use of kerb space.
- ccc. Historic vehicles are not provided with concessions within these proposals as the council does not have access to the required data sets. Additionally, whilst we note that typically some historic vehicles may not travel significant distances, these proposals are not concerned with how much pollution a vehicle emits over a year, but how much pollution they emit whilst being used, and particularly when they are being used within the city centre of Bath. Of course, where vehicles are used less frequently, they may be impacted by less by these proposals as there will be less need to pay for parking in council car parks in Bath.
- ddd. The charges for season tickets were increased in November 2022 as they previously provided a historic discount against the equivalent daily charge across locations ranging from 43% to 70% percent. This significant discount was a result of previous charges being increased in isolation by a fixed percentage when daily P&D charges have been set separately in line with the objectives of the Parking Strategy, adopted in 2018, increasing the disparity at each review. This not only encouraged private vehicle use amongst commuters but reduces the availability of space in council car parks to visitors, both those looking for short or long stay parking.
- eee. The season ticket charges still provide a significant discount of 35% against the equivalent daily charge if purchased each day.
- fff. It should be noted that only car park users with more polluting vehicles will pay higher emissions-based charges in Bath car parks for their season tickets.
- ggg. In acknowledgement of the price increase to season tickets in November 2022, these proposals will delay the introduction of emission-based charges for existing season ticket holders (those that have a season ticket on the day emission-based charges take effect) on renewal of their existing season ticket, giving customers additional time to adjust to the new charges.

hhh. The proposals will still allow season ticket holders to manage and swap vehicles on their season ticket where they have been pre-registered at the time of purchase, with the charge based on the most polluting vehicle.

iii. The overnight charge is designed to reflect the fact that council car parks remain open 24 hours a day and are regularly used during these times. The sites therefore incur costs for maintenance, lighting, CCTV, which must be funded to support these opening hours. This nominal charge is not expected to impact visitors who stay overnight as the 24-hour charge covers this overnight period.

jjj. The Park and Ride service also provides a range of discounts that include;

- i. English National Concessionary Pass holders can travel for free after 09.00 Monday to Friday.
- ii. A group of two adults may purchase a discounted return fare after 09.30 Monday to Friday of £5.40
- iii. Regular service users can benefit from discounts when purchasing 10 single journeys one transaction (for use anytime), equivalent to a return fare of £2.80.
- iv. up to 5 children (under 16) can travel for free with each fare paying adult.
- v. A Bath Zone group day ticket, providing unlimited travel for 5 people on the Park and Ride and all First buses in the Bath Zone, is £12.00

kkk. The new Park and Ride contract, which started on 28 August 2022, operates on a gross cost basis with the Council retaining future risk regarding service patronage and income from fares offsetting these costs. Therefore, additional income that can be raised through increased use of the service may present future opportunities to introduce additional and later services from the sites into the city centre.

lll. In late 2022 the council appointed a Park & Ride Service and Commercial Lead who is responsible for developing the three P&R sites in Bath to maximise the commercial value and promote sustainable travel in Bath, aligning with core policies such as the Journey to Net Zero.

mmm. The council has previously examined the potential for provision of a P&R site to the east of Bath and concluded that there are no deliverable sites meaning that alternative solutions to tackling these issues are now being explored.

nnn. 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.

ooo. The Council cannot be responsible for technical issues experienced because of infrastructure, equipment, or processes that it does not control (for example mobile communication signals or a customer's bank authorisation processes). Should a



motorist using a council car park experience a problem when using the MiPermit service, alternative means to make payment are available including cash and payment card terminals which are soon to be included within pay and display machines in all council car parks where power supplies allow. Should any motorists receive Penalty Charge Notice (PCN), they may appeal to the Council, who has a duty to consider all mitigating circumstances. Should this appeal be unsuccessful, the motorist may exercise a further statutory right of appeal to the Traffic Penalty Tribunal. More information on this process is available online <https://beta.bathnes.gov.uk/challenging-parking-fine>.

ppp. Bath benefits from a Railway station, centrally located as part of the main line to and from the South West. Other local stations for example Keynsham and Oldfield Park provide further local convenience.

qqq. The council's Parking Strategy, adopted in 2018, sets out within objective 24 to "Continue to encourage the provision of car clubs in central Bath". There is currently no formal arrangement for the provision and expansion of car club services, including an increased use of EV vehicles to provide viable alternatives to private vehicles for residents. This commitment forms part of the councils forward plan of works and will be progressed when resources have been identified.

rrr. The council does not have the power to prevent bus services from being registered and operated. Several years ago, it was able to get conditions put in place on tour bus services through the Traffic Commissioner which does place some limits on the tour services operating. It should also be noted that buses must comply with the requirements of the Clean Air Zone when operating within its boundary, this being a scheme with complimentary objectives to proposals for emission-based parking charges.

sss. Bus based public transport is mainly a deregulated service under the Transport Act 1985. Due to the pandemic, most if not all services are currently funded by Central Government, who have spent over £1b to support bus networks during the period since March 2020.

ttt. Bus operator First West of England has invested £30million as part of a programme to introduce new-build vehicles and retrofit new technology into slightly older models to become much cleaner. It has also committed to operating a zero-emission bus fleet by 2035.

uuu. BNES continues to support what are classed as socially necessary bus services to the tune of approximately £1.4m per annum through a mixture of funding sources including revenue funding and section 106 money, paid via levy to the West of England Combined Authority who are the Local Transport Authority since the powers transferred in 2018. The council continues to attempt to identify additional funding mechanisms to support services further, but this can be challenging in light of other budget pressures.

vvv. In 2021 the West of England Combined Authority (WECA) published the Local Cycling and Walking Infrastructure plan (LCWIP) which proposes capital investment of £411m by 2026. The Plan was a collaborative effort between the West of England councils, including B&NES, WECA and local stakeholder groups. It can be viewed at: <https://www.westofengland-ca.gov.uk/what-we-do/transport/local-cycling-and-walking-infrastructure-plan/>

www. In April 2022, WECA was awarded £540m from the Department for Transport to improve the sustainable transport in the West of England, including public transport, walking, cycling, and wheeling. £129m will be spent in B&NES, matched by a £17m local contribution.

Details of the funding settlement and project scope can be found here:

<https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/10/West-of-England-Combined-Authority-CRSTS.pdf>

xxx. The council has been investing in better infrastructure for walking and cycling and working with WECA, as detailed above, and is planning further improvements. More information on these will be published in due course, with opportunities for people to comment as appropriate. This includes the provision of cycle hangers as part of a two-year trial to improve travel choices for residents.

<https://newsroom.bathnes.gov.uk/news/council-installs-additional-bike-hangars-part-two-year-trial>

yyy. Work is now underway on delivering an extensive plan of active travel schemes across the district. Work is currently focused on delivering schemes outlined in the LCWIP plus schemes to encourage active travel as part of 3 major projects:

- i. Bath city centre;
- ii. Bath to Bristol corridor; and
- iii. Somer Valley to Bristol and Bath (A37, A367 and A362 corridors).

zzz. Public consultation has been held on several active travel schemes and the following two schemes have now been implemented. Further details on these schemes and others can be found at: <https://beta.bathnes.gov.uk/active-travel>

- i. A4 Upper Bristol Road: and
- ii. A36 Beckford Road

aaaa. The council only has legal powers to take action against vehicles parking on the pavement where this occurs adjacent to parking restrictions, such as double yellow lines or marked bays. Where there are no restrictions on the carriageway pavement parking can only be enforced by the Police using their powers of obstruction.

bbbb. The Government recognises the national problems caused by pavement parking and their impact on pedestrians and vulnerable persons. A national consultation on this issue closed in November 2020 and the council considers that strong action is

required to address it. We are hopeful that this will see us provided with the necessary powers to take direct action where there are no restrictions. You can find more information on this consultation online at <https://www.gov.uk/government/consultations/managing-pavement-parking/pavement-parking-options-for-change>. At this time there has been no further updated from the Department for Transport following this consultation ending and we are working with other bodies to obtain an update.

## 6 Summary & Recommendations

- 6.1.1 In February 2023, as part of the budget setting process, the Council's Cabinet approved proposals put forward to consult on the introduction of emission-based car park charges in bath car parks. These proposals are set out in section 1.2 and 1.3 of this report with a variation of the Councils off street traffic regulation orders required to implement.
- 6.1.2 The proposals were developed to facilitate the strategic outcomes of local transport policy and align with the Council policy on Liveable Neighbourhoods and the Journey to net zero. By reducing congestion on our roads, the aim is to improve public transport journey times and improve air quality to secure the safer movement of pedestrian traffic, supporting increased take up of active travel.
- 6.1.3 The consultation set out the Council's proposals and was advertised in the local press and at each site impacted by the new charges. In addition to the notices required by the regulations the council took a more proactive approach on this occasion, due to the emotive nature of the proposals, to ensure as many customers as possible were aware of the proposals and how to provide feedback.
- 6.1.4 The online survey generated 1692 individual responses, indicating both the success of the engagement and how emotive the proposals are. Analysis of page views data indicates that respondents spent a low average time of just over 1 minute reviewing the concise, but complex, information presented.
- 6.1.5 Parking charges will always be emotive and formed a core tenet of these proposals, these being the mechanism to incentivise behaviour change. It was therefore not unexpected that the overall view of respondents would be against the new charges, with only 32% percent of responses being supportive or partially supportive. It should be noted that this was a higher level of support than the most recent review of car parking charges in November 2022, which was 28%.
- 6.1.6 Comments were received from respondents, and these raised a range of themes and issues which have been responded to within this report.
- 6.1.7 Analysis of the consultation results indicate significant concern about the impacts of air pollution and poor air quality, with the majority of respondents also in support of action to address these key matters.
- 6.1.8 Surprisingly this support does not translate into wide support for the proposals themselves, indicating an element of contrasting opinion within respondent views when considering the financial impact on the convenience of city centre parking, as evidenced in both section 4.3 and section 5.3.
- 6.1.9 No feedback was received on the proposal to reintroduce the Holburne Museum car park into the TRO, which it should be noted reflects the current operation of the museum car park.

- 6.1.10 An equalities impact assessment was completed in conjunction with these proposals to consider what impacts may be likely on different groups and what measures may be appropriate to mitigate any identified impact. No updates were required following consideration of the consultation responses.
- 6.1.11 After consideration of the results and feedback from respondents, it is recommended that the variations to the Bath Off Street Traffic Regulation Order as set out in section 1.2 of this report are implemented as proposed.

## Appendix Aa – Proposals in detail

**Table 1: Emissions based charges - Rounded to nearest 10p (\*1)- Petrol fuel or other type (non diesel)**

(Hours – where available)	Emissions based charges											
	Existing Tariff	CO2 bands							Engine cc			
		0-130 g/km	131 - 150 g/km	151 - 170 g/km	171 - 190 g/km	191 - 225 g/km	226 - 255 g/km	Over 255 g/km	0-1550 cc	1551-1950cc	1951-2950cc	over 2951cc
1	£1.70	£1.70	£1.80	£1.80	£1.90	£1.90	£2.00	£2.00	£1.80	£1.90	£2.00	£2.10
2	£3.40	£3.40	£3.50	£3.60	£3.70	£3.80	£3.90	£4.00	£3.60	£3.80	£4.00	£4.20
3	£5.10	£5.10	£5.30	£5.40	£5.50	£5.70	£5.80	£6.00	£5.40	£5.70	£6.00	£6.20
4	£6.80	£6.80	£7.00	£7.20	£7.40	£7.60	£7.70	£7.90	£7.20	£7.50	£7.90	£8.30
6	£10.20	£10.20	£10.50	£10.80	£11.00	£11.30	£11.60	£11.90	£10.80	£11.30	£11.90	£12.40
8	£13.60	£13.60	£14.00	£14.30	£14.70	£15.10	£15.40	£15.80	£14.30	£15.00	£15.80	£16.60
24	£17.10	£17.10	£17.60	£18.00	£18.50	£18.90	£19.40	£19.90	£18.00	£18.90	£19.80	£20.80
Evening (6pm to 8pm where applicable)	£1.50	£1.50	£1.60	£1.60	£1.70	£1.70	£1.70	£1.80	£1.60	£1.70	£1.80	£1.90
Overnight (8pm to 8am)	£1.50	£1.50	£1.60	£1.60	£1.70	£1.70	£1.70	£1.80	£1.60	£1.70	£1.80	£1.90

(\*1) - Charges rounded to nearest 10p for cash handling purposes.

(\*2) - These are the existing parking charges in council car parks as implemented in November 2022

**Table 2: Emissions based charges - Rounded to nearest 10p (\*1) - Diesel fuel**

(Hours – where available)	Emissions based charges - including Diesel charge											
	Existing Tariff	CO2 bands							Engine cc			
		0-130 g/km	131 - 150 g/km	151 - 170 g/km	171 - 190 g/km	191 - 225 g/km	226 - 255 g/km	Over 255 g/km	0-1550 cc	1551-1950cc	1951-2950cc	over 2951cc
1	£1.70	£2.20	£2.30	£2.30	£2.40	£2.40	£2.50	£2.50	£2.30	£2.40	£2.50	£2.60
2	£3.40	£3.90	£4.00	£4.10	£4.20	£4.30	£4.40	£4.50	£4.10	£4.30	£4.50	£4.70
3	£5.10	£5.60	£5.80	£5.90	£6.00	£6.20	£6.30	£6.50	£5.90	£6.20	£6.50	£6.70
4	£6.80	£7.30	£7.50	£7.70	£7.90	£8.10	£8.20	£8.40	£7.70	£8.00	£8.40	£8.80
6	£10.20	£11.20	£11.50	£11.80	£12.00	£12.30	£12.60	£12.90	£11.80	£12.30	£12.90	£13.40
8	£13.60	£14.60	£15.00	£15.30	£15.70	£16.10	£16.40	£16.80	£15.30	£16.00	£16.80	£17.60
24	£17.10	£18.10	£18.60	£19.00	£19.50	£19.90	£20.40	£20.90	£19.00	£19.90	£20.80	£21.80
Evening (6pm to 8pm where applicable)	£1.50	£2.00	£2.10	£2.10	£2.20	£2.20	£2.20	£2.30	£2.10	£2.20	£2.30	£2.40
Overnight (8pm to 8am)	£1.50	£2.50	£2.60	£2.60	£2.70	£2.70	£2.70	£2.80	£2.60	£2.70	£2.80	£2.90

(\*1) - Charges rounded to nearest 10p for cash handling purposes.

## Appendix Bb - Indicative Season ticket prices based on these proposals

Current cost for a 12-month permit, valid 7 days a week, is £4056.98.

Proposed emission-based charge for new customers only. Indicative charges are based on 12-month permit.

	Existing Tariff	CO2 bands							Engine cc			
		0-130 g/km	131 - 150 g/km	151 - 170 g/km	171 - 190 g/km	191 - 225 g/km	226 - 255 g/km	Over 255 g/km	0-1550 cc	1551- 1950cc	1951- 2950cc	over 2951cc
Non-diesel fuelled vehcile	£4,056.98	£4,056.98	£4,175.60	£4,270.50	£4,389.13	£4,484.03	£4,602.65	£4,721.28	£4,270.50	£4,484.03	£4,697.55	£4,934.80
Diesel fuel	£4,056.98	£4,294.23	£4,412.85	£4,507.75	£4,626.38	£4,721.28	£4,839.90	£4,958.53	£4,507.75	£4,721.28	£4,934.80	£5,172.05

## Appendix Cc – Draft Equalities Impact Assessment

**Bath & North East  
Somerset Council**

Improving People's Lives



**Bath and North East Somerset,  
Swindon and Wiltshire**  
Integrated Care Board

# Equality Impact Assessment / Equality Analysis

(Updated December 2022)

<b>Title of service or policy</b>	Off Street Emissions based charges 2023
<b>7 8 Name of directorate and service</b>	Place Management - Parking Services
<b>Name and role of officers completing the EIA</b>	Andrew Dunn, Team Manager – Parking Jane Whiteman Service Delivery Officer - Parking
<b>9 10 Date of assessment</b>	Draft 13 June 23



Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

### 1.1 Identify the aims of the policy or service and how it is implemented.

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>A review of off-street parking charges in council operated car parks has been undertaken with proposals to introduce emissions-based charges in Bath car parks due to clean air direction to help 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 pedestrians by air pollution. The new charges will help incentivise the displacement of more polluting vehicles outside the city centre to more appropriate locations, such as the park and rides.</p> <p>The new charges will be based on the existing prices introduced on 1st November 2022 <a href="https://beta.bathnes.gov.uk/find-car-parks-bath">https://beta.bathnes.gov.uk/find-car-parks-bath</a> with drivers of more polluting vehicles charged progressively more for their parking, mirroring the structure of emission-based residents parking permits as per DVLA VED bands.</p> <p>There will be no change to the charges for drivers of EV vehicles or non-diesel fuelled vehicles that emit up to 130g/km of CO2.</p>

	<p>Season tickets will also be subject to emissions-based charging for new customers. Existing season ticket customers will have their charge discounted to ensure their charge remains the same as it is currently (and not emission based) for the first 12 months following the large price rise they experienced in November 2022 in order to help them plan and adapt to the new charge, particularly as many residents in central Bath without access to private parking or on street permits rely on a season ticket for their needs.</p> <p>Delivery will be achieved in conjunction with colleagues in Highways to develop and implement required Traffic Regulation Orders and will be facilitated by a separate project on the forward plan of works to replace obsolete pay and display equipment.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>There is no national requirement and as such there is room for review. However, although not the purpose of these proposals, it is noted that by implementing these changes it should help in addressing the climate emergency by encouraging the use of sustainable transport and active travel. This also therefore compliments the 'Journey to Net Zero' plan, reducing the environmental impact of transport and which was adopted by the Council in May 2022.</p> <p>Private car parks are not affected by these proposals.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>This policy meets the Councils core policies of tackling the climate and ecological emergencies.</p> <p>It is also in line with Transport Polices, the Parking Strategy, and is consistent with the objectives of the Clean Air Zone, the prioritisation of active travel and the 'Journey to Net Zero' plan.</p> <p><a href="https://beta.bathnes.gov.uk/document-and-policy-library/balancing-your-needs-parking-strategy-bnes">https://beta.bathnes.gov.uk/document-and-policy-library/balancing-your-needs-parking-strategy-bnes</a></p> <p><a href="https://beta.bathnes.gov.uk/bath-clean-air-zone">https://beta.bathnes.gov.uk/bath-clean-air-zone</a></p>

	<p><a href="https://beta.bathnes.gov.uk/active-travel">https://beta.bathnes.gov.uk/active-travel</a></p> <p><a href="https://beta.bathnes.gov.uk/active-travel-schemes-overview">https://beta.bathnes.gov.uk/active-travel-schemes-overview</a></p> <p><a href="https://beta.bathnes.gov.uk/journey-net-zero/why-do-we-need-journey-net-zero">https://beta.bathnes.gov.uk/journey-net-zero/why-do-we-need-journey-net-zero</a></p> <p>Redevelopment within the historic core has also seen changes to the availability of parking and the promotion of parking out of the city centre. Prioritising sustainable transport such as the park and ride service ensures that the city, as a popular visitor destination and double UNESCO world Heritage site remains accessible.</p>
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## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<b>2.1</b> What equalities training have staff received to enable them to understand the needs of our diverse community?	<p>All staff within Parking Services have completed Equalities training during their induction to ensure compliance with corporate standards.</p> <p>A structured training plan is in place for all new staff to ensure they do receive equalities training in a timely manner after commencing employment. The team also receive Equalities training provided by our Corporate Equalities Officer to maintain and refresh knowledge.</p>
<b>2.2</b> What is the equalities profile of service users?	<p>Anyone who requires parking within the geographical area of Bath and North East Somerset can potentially purchase parking, therefore the service users are likely to be representative of the national population that travel by private vehicle. <a href="http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping">http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-mapping</a></p>
<b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there	<p>Parking Services also uses the Voicebox survey to measure customer satisfaction. The results of the Voicebox 28 survey (2019/20) record 67% of respondents rating the provision and operation of off-street parking areas as acceptable to good.</p>

<p>any gaps? Or differences in experience/outcomes?</p>	<p>The equivalent analysis from the latest survey, Voicebox 31, is not yet available.</p>
<p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>The “Balancing your Needs” parking strategy was consulted on in 2017 and adopted in 2018. The parking strategy set out the key policy direction and objectives for the service until 2028.</p> <p>The emission-based car parking charges have been developed in cooperation with Parking Services, the Director of Place Management and Cabinet members, and proposed for 2023/24 as part of the Council's budget setting process, as approved full Council in February 2023.</p> <p>This EIA and the proposals were presented to the B&amp;NES Independent Equalities Advisory Group on 13 June 2023 and feedback has been incorporated into this assessment.</p> <p>This EIA and the proposals were presented to the Climate Emergency and Sustainability Policy Development and Scrutiny panel on 6 July 2023, no amendments were made to this EIA.</p> <p>This EIA and the proposals were presented to the general public as part of the statutory consultation process for Traffic Regulation Orders (TROs) in line with the Road Traffic Regulation Act 1984 across a 21-day period from 13 July 2023 to 3 August 2023 for feedback. No amendments were made to this EIA.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>Parking charges are to be set within the Council's Traffic Regulation Orders and changes to these require a Statutory Notification period of 21 days for respondents to consider and provide feedback.</p> <p>All members of the public can provide feedback on the proposals, indicating whether they support; partially support; or object to them. This includes feedback if a respondent feels there is an equalities issue that has not been identified or considered. The Council is mandated to consider such objections.</p> <p>The consultation will be publicised via local press, social media and our website where people can view the information and complete the online survey to ‘Have Their Say’. We will also proactively contact customers where contact details are held in line with Data Protection requirements. The consultation received over 8500 page views, with approx. 6500 of these being unique visits. 1692 responses were received, and a report has been produced to accompany this consultation assessment.</p>

	<p>Web pages will meet the required Accessibility standards.</p> <p>Consultation information will make known alternative formats are available upon request and who to contact. This includes a printed survey, or information in another format including audio, braille, large print or in another language.</p>
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### 3. Assessment of impact: ‘Equality analysis’

<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> <li>• Meets any particular needs of equalities groups or could help promote equality in some way.</li> <li>• Could have a negative or adverse impact for any of the equalities groups</li> </ul>		
	<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.1 Issues relating to all groups and protected characteristics</b>		
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.		<p>Only car park users with higher polluting vehicles will pay higher emissions-based charges in Bath car parks. On Street parking charges are not affected by these proposals.</p> <p>Car parks (and Park &amp; Ride sites) provide adequate lighting (noting fees for electricity have increased). It is also a requirement to have regard</p>

		<p>to conservation areas and restrictions that may be imposed to limit 'light spill'.</p> <p>CCTV is present at Bath car parks including Avon Street, Charlotte Street, Guildhall, Manvers Street, Kingsmead Square, Sports &amp; Leisure, and Cattle Market Road car parks. CCTV provision is currently under review and will include identification of any potential for improvements. There is a choice of other alternative options for travel, for example public transport, this including Park &amp; Ride Services (CCTV present at all locations). Other private car park provision is available in Bath.</p>
<p><b>3.3 Pregnancy and maternity</b></p>	<p>Any improvements in air quality that result from a reduction in more polluting vehicles entering central areas will be of benefit to those that are vulnerable to poor air quality.</p>	<p>Women on maternity leave may have reduced income and need to access health services in Bath.</p> <p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including Park &amp; Ride Services. Other private car park provision is available in Bath.</p> <p>On Street parking charges are not affected by these proposals.</p>
<p><b>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</b></p>		<p>Only car park users with higher polluting vehicles will pay higher emission-based charges in Bath car parks.</p>

		<p>On Street parking charges are not affected by these proposals.</p> <p>Car parks (and Park &amp; Ride sites) provide adequate lighting (noting fees for electricity have increased). It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit 'light spill'.</p> <p>CCTV is present at Bath car parks including Avon Street, Charlotte Street, Guildhall, Manvers Street, Kingsmead Square, Sports &amp; Leisure, and Cattle Market Road car parks. CCTV provision is currently under review and will include identification of any potential for improvements.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including Park &amp; Ride Services (CCTV present at all locations). Other private car park provision is available in Bath.</p>
<p><b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p>	<p>Any improvements in air quality that result from a reduction in vehicles entering central areas will be of benefit to those that are vulnerable to poor air quality.</p> <p>Dedicated parking for Blue Badge holders is available adjacent to the bus stop at all three park and ride sites and enforcement is undertaken</p>	<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>On Street parking charges are not affected by these proposals.</p> <p>Proposals may impact a Blue Badge holder wishing to use an off-street parking place included within these proposals through an increased parking charge. However, all on street pay and display bays and resident permit holder bays</p>

	<p>to prevent abuse by those who are not Blue Badge holders.</p> <p>Blue badges can be used on street in paid for parking and permit bays for no time limit.</p>	<p>within the geographical area of Bath &amp; North East Somerset Council are free to use by a Blue Badge holder providing a valid blue badge is clearly displayed.</p> <p>A Blue badge also allows up to 3 hours of parking when parking on yellow lines where no loading restrictions are in place.</p> <p>It should be noted that there are other changes taking place related within Bath city centre for security purposes which restrict motor vehicle access to some roads within the city during the hours 10.00 to 18.00/2200. Additional work has been undertaken to consider some of the issues experienced by Blue Badge holders as a result of these road closures and to ensure alternative locations where a Blue Badge can be used for free on street parking are available. Further information can be viewed at:-  <a href="https://beta.bathnes.gov.uk/citycentresecurityworks">https://beta.bathnes.gov.uk/citycentresecurityworks</a></p> <p>View our map of Blue Badge parking bays and public seating in Bath City Centre online at  <a href="https://beta.bathnes.gov.uk/media/4479">https://beta.bathnes.gov.uk/media/4479</a></p> <p>New pay and display equipment required to support emission-based charging compliant with requirements of the Equalities Act and site assessment by the supplier will include feedback about accessibility around the machine, including how the location could be improved to help wheelchair users access the machines. Mitigations will be progressed on a case-by-case</p>
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		<p>basis and will ensure machines located by disabled bays are prioritised, with appropriate signage included to help direct customers.</p>
<p><b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups</p>	<p>All concessionary pass holders can use the Park &amp; Ride service free of charge upon use of their pass after 09.00 and are therefore not affected by any rise in car parking charges.</p>	<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.  On Street parking charges are not affected by these proposals.</p> <p>There may be an adverse impact on some users where only cashless payment options are available, for example at Broad Street and Green Park Road car parks and payment cannot be accepted by cash. Recent data published by Ofcom in 2022 shows that 97% of the UK population have access to a mobile phone, with this dropping to 90% for a smartphone. Ofcom data identifies that for those aged 65 and over the percentages fall 90% and 68% respectively.</p> <p>In addition to the smartphone app, MiPermit may be used on any mobile phone using the text service or via telephone to the MiPermit Customer Service team (Monday to Friday 8am – 6pm, Saturday 8am – 4pm and Sunday from 10am – 4pm). Customers may also create a stay in advance from a landline (via the Customer Service team) or via a home PC. Whilst this does not reserve a parking space, the park and rides sites typically operate below capacity ensuring a space will be available when they arrive, the only exception to this is during the extreme peak periods such as the Christmas Market when demand exceeds capacity.</p>

		<p>Card payment terminals will now be widely deployed across council car parks where electricity supplies to equipment allow to increase the flexibility of payment options including those who may not have access to a mobile/smart phone.</p> <p>We will continue to assess the impact of emission-based lookups on the power status of machines operating on battery power (charged by solar panels). Installation of card terminals in battery powered machines will be assessed on a location-by-location basis where usage/power drain/and charge status allow.</p>
<p><b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups</p>		<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>On Street parking charges are not affected by these proposals.</p> <p>Car parks (and Park &amp; Ride sites) provide adequate lighting (noting fees for electricity have increased). It is also a requirement to have regard to conservation areas and restrictions that may be imposed to limit 'light spill'.</p> <p>CCTV is present at Bath car parks including Avon Street, Charlotte Street, Guildhall, Manvers Street, Kingsmead Square, Sports &amp; Leisure and Cattle Market Road car parks. CCTV provision is currently under review and will include identification of any potential for improvements.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including</p>

		Park & Ride Services (CCTV present at all locations). Other private car park provision is available in Bath.
<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people		No known impact
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?		No known impact
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		<p>Only car park users with more polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>Only car park users with higher polluting vehicles will pay higher emission-based charges in Bath car parks.</p> <p>There is a choice of other alternative options for travel, for example public transport, this including Park &amp; Ride Services. Other private car park provision is available in Bath.</p> <p>On Street parking charges are not affected by these proposals.</p>
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are	The Council provides a Park and Ride service that is of benefit to the socio-economically disadvantaged	Whilst there is no intended impact based on socio-economically disadvantage- all who qualify can purchase parking, increased charges could have

<p>disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b></p>	<p>as the service allows motorists to travel by private vehicle to the edge of the city and benefit from the use of convenient and sustainable transport directly into the city centre that is typically cheaper than the cost of parking in the city.</p>	<p>an impact on those who are economically disadvantaged.</p> <p>It may be that lower income households have an older car that may emit more carbon dioxide, and therefore pay more to park in Bath council owned car parks.</p> <p>However, the costs of parking stays equate only to a small percentage of the annual costs of running a motor vehicle.</p> <p>Other more sustainable options including active travel are also available.</p> <p>People who are of state Pension Age may apply for a free Older Persons Bus Pass.</p> <p>The Park and Ride service provides a range of discounts that include;</p> <ul style="list-style-type: none"> <li>• English National Concessionary Pass holders can travel for free after 09.00 Monday to Friday.</li> <li>• A group of two adults may purchase a discounted fare after 09.30 Monday to Friday.</li> <li>• Regular service users can benefit from discounts when purchasing 10 single journeys one transaction (for use anytime).</li> <li>• up to 5 children (under 16) can travel for free with each fare paying adult.</li> </ul> <p><a href="https://travelwest.info/park-ride/">https://travelwest.info/park-ride/</a></p>
<p><b>3.12 Rural communities*</b> identify the impact / potential</p>	<p>The Council provides a Park and Ride service which is of benefit to</p>	<p>Whilst there is no intended impact for those living in rural communities, the costs of parking stays</p>

<p>impact on people living in rural communities</p>	<p>those living in rural communities without access to a suitable service that need to visit the centre of Bath.</p> <p>The Park and Ride service allows these motorists to travel by private vehicle to the edge of the city and benefit from the use of convenient and sustainable transport directly into the city centre that is typically cheaper than the cost of parking in the city.</p>	<p>equate only to a small percentage of the annual costs of running a motor vehicle and therefore the impact is small.</p> <p>Other more sustainable options including the Park and Ride are available 7 days a week</p> <p><a href="https://travelwest.info/park-ride/">https://travelwest.info/park-ride/</a></p>
<p><b>3.13 Armed Forces Community</b>  <b>**</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>		<p>No known impact.</p>

\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

#### 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
EIA to be reviewed annually or if significant changes happen within the service provision.	To review the EIA		Team Manager - Parking	1 <sup>st</sup> April 2024
Issues raised by: <ol style="list-style-type: none"> <li>1. New elected members via the Informal Cabinet process</li> <li>2. Council's Independent Equalities Advisory Group</li> <li>3. The Climate Emergency and Sustainability Policy Development and Scrutiny panel</li> <li>4. Consultees through statutory consultation due to take place July/August 2023</li> </ol>	Staff to review feedback and identify any equalities issues and actions required as necessary.	Completion of review of feedback: <ol style="list-style-type: none"> <li>1. Completed 13/6/2023</li> <li>2. Completed 13/6/2023</li> <li>3. Completed 6/7/2023</li> <li>4. Completed 12/8/2023</li> </ol>	Project lead	One month after engagement ends


## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:** Chris Major, Director of Place Management  
nominated senior officer)

(Divisional Director or

**Date:** 13/6/2023


**Appendix Dd – Additional signage to highlight proposals.**

**We want to hear from you**

Have your say on the introduction of parking charges based on vehicle emissions at council owned car parks in Bath.

Take part in the public consultation:

**SCAN ME**



**Consultation closes 5pm  
Thursday 3rd August**

**Bath & North East Somerset Council**  
Improving People's Lives



## Appendix Ee – Breakdown of results by location of respondent

		I don't support this proposal	I partially support this proposal	I support this proposal	Total	% of respondents
Bath area wards	Bathwick	6	2	7	15	0.9%
	Combe Down	24	3	9	36	2.1%
	Kingsmead	149	25	37	211	12.5%
	Lambridge	27	5	13	45	2.7%
	Lansdown	67	15	26	108	6.4%
	Moorlands	32	6	13	51	3.0%
	Newbridge	55	13	8	76	4.5%
	Odd Down	21	2	5	28	1.7%
	Oldfield Park	35	6	4	45	2.7%
	Southdown	38	3	5	46	2.7%
	Twerton	22	0	3	25	1.5%
	Walcot	47	11	30	88	5.2%
	Westmoreland	30	3	9	42	2.5%
	Weston	38	7	10	55	3.3%
	Widcombe & Lyncombe	81	20	49	150	8.9%
Keynsham area wards	Keynsham North	12	0	0	12	0.7%
	Keynsham South	14	4	4	22	1.3%
	Keynsham East	15	3	2	20	1.2%
North East Somerset area wards	Bathavon North	40	9	6	55	3.3%
	Bathavon South	26	6	6	38	2.2%
	Chew Valley	11	0	2	13	0.8%
	Clutton & Farmborough	7	0	1	8	0.5%
	High Littleton	3	2	0	5	0.3%
	Mendip	3	1	0	4	0.2%
	Midsomer Norton North	15	0	0	15	0.9%
	Midsomer Norton Redfield	4	0	0	4	0.2%
	Paulton	10	1	1	12	0.7%
	Peasedown	19	6	3	28	1.7%
	Publow & Whitchurch	1	0	0	1	0.1%
	Radstock	9	3	3	15	0.9%
	Saltford	16	9	7	32	1.9%
	Timsbury	11	2	3	16	0.9%
	Westfield	16	4	2	22	1.3%
<b>Total of B&amp;NES respondents</b>		<b>904</b>	<b>171</b>	<b>268</b>	<b>1343</b>	<b>79.4%</b>
	Outside Banes	187	45	46	278	16.4%
	Unsure	62	6	3	71	4.2%
<b>Grand Total</b>		<b>249</b>	<b>51</b>	<b>49</b>	<b>349</b>	<b>20.6%</b>

Andy Dunn, Jane Whiteman  
Parking Services  
Highways & Transport  
Bath & North East Somerset Council

Email: [Parking@bathnes.gov.uk](mailto:Parking@bathnes.gov.uk)