

OFFICER DECISION REPORT - TRAFFIC REGULATION ORDER (TRO)

3

APPROVAL TO PROGRESS TRO

PREPARED BY: Traffic Management Team, Highways and Traffic Group

TITLE OF REPORT: Emission based car park charges in Bath

PROPOSAL: Introduction of vehicle emission-based parking charges in council car parks

SCHEME REF No: 23-009

REPORT AUTHOR: Andrew Dunn, Team Manager - Parking

1. DELEGATION

The delegation to be exercised in this report is contained within **Part 3, Section 4** of the Constitution under the **Delegation of Functions to Officers**, as follows:

| | |
|-------------------|--|
| Section A | The Chief Executive, Strategic Directors, Divisional Directors and Heads of Service have delegated power to take any decision falling within their area of responsibility....” |
| Section B | Without prejudice to the generality of this, Officers are authorised to: serve any notices and make, amend or revoke any orders falling within his/her area of responsibility. |
| Section D9 | An Officer to whom a power, duty or function is delegated may nominate or authorise another Officer to exercise that power, duty or function, provided that Officer reports to or is responsible to the delegator. |

For the purposes of this report, the Director of Place Management holds the delegated power to make, amend or revoke any Orders.

2. LEGAL AUTHORITY

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

This proposal is made in accordance with the Road Traffic Regulation Act 1984, section 35 (Variation of charges at off-street parking places). An order under section 35(1)(a)(iii) of this Act makes provision as to the charges to be paid in connection with the use of off-street parking places, the authority making that order may vary those charges by notice given under this section.

3. PROPOSAL

Emissions based parking charges

- 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.
- 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.
- 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.
- 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>
- 3.5. Customers will be required to provide their vehicle registration mark when purchasing parking, including when paying with cash.
- 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.
- 3.7. It's anticipated that a higher charge (those motorists as set out in paragraph 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.
- 3.8. The proposed charging structure for Bath car parks is outlined in Appendix A to this report, with the charges for diesel fuelled vehicles shown in table 2 of Appendix A.
- 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.
- 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.

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 and unreasonably low discounts offered for season tickets prior to this review, some customers experienced significant price rises. Season ticket costs are therefore proposed to remain at current charges for existing season ticket customers for the first 12 months of the operation of emissions-based charges.

3.12. Charges for new customers will be linked to the emission of their vehicle. Appendix B provides an indication of the charges for season tickets based on current parking charges.

Holburne Museum car park

3.13. Emission-based charges do not apply at this location, provided exclusively for visitors to the Holburne Museum.

3.14. It’s also recommended that a change is made to address a historic anomaly with the following inserted into schedule 1 (Car Parks with Parking Charges):

| Item No. | Column 1 Location of Parking Place | Column 2 Days and Hours of Operation | Column 3 Period of Parking | Column 4 Charge per Parking Place | Column 5 Maximum Period of Parking |
|----------|---------------------------------------|---|--|---|---------------------------------------|
| 13. | Holburne Museum | Every day including bank holidays 8am – 6pm inclusive, Charges do not apply to Blue Badge holders on display of a valid Blue Badge. | Up to 2 hours Up to 3 hours Up to 4 hours Up to 6 hours Up to 10 hours | £3.50 £5.00 £7.00 £10.50 £12.50 | Until 6pm |

4. **BACKGROUND**

4.1. 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.

4.2. 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 mass transport, walking and cycling, with incentives to reduce the use of more polluting vehicles, in accordance with the UK government National Air Quality Strategy
- 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.

4.3. 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. In the UK, these costs add up to more than £20 billion every year (Source: Royal College of Physicians). Any reduction in emissions within the city centre will have a beneficial impact on those living and visiting the city centre.

4.4. As noted in the National Air Quality Strategy, measures designed to address air quality issues will often have a positive effect on climate change. Whilst 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.

4.5. 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:

4.5.1. Spring 2021 engagement –

<https://beta.bathnes.gov.uk/parking-permits-consultation-april-2021>

4.5.2. Autumn 2021 statutory consultation –

<https://beta.bathnes.gov.uk/parking-TRO-consultation-autumn-2021>

4.6. 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 draft EQIA is included as Appendix C to this report.

4.7. 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.

5. SOURCE OF FINANCE

Implementation of these proposals are to be funded from Capital budgets.

6. CONSULTATION REQUIREMENT

The proposal requires informal consultation with the Chief Constable, Ward Members, and the Cabinet Member for Transport.

7. COMMENTS RECEIVED TO DATE

Chief Constable

No comments.

Parking Services

No additional comments.

Ward Members

Bathavon North:

Cllr Kevin Guy – No comment.

Cllr Sarah Warren – 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 and unreasonably low discounts offered for season tickets prior to this review.

Does it mean "unreasonably HIGH discounts"?

I'm afraid I missed the informal cabinet meeting this week - why is the Holburne Museum car park excluded?

Response: Thank you for bringing this to our attention. This is a typographic error and paragraph 3.11 should read as below (clarification highlighted with bold text):

*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 and unreasonably **high** discounts offered for season tickets prior to the **November 2022** review, some customers experienced significant price rises. Season ticket costs are therefore proposed to remain at current charges for existing season ticket customers for the first 12 months of the operation of emissions-based charges.*

Holburne Museum

Emission-based charges are not proposed at the Holburne Museum as this car park is provided and maintained by the Holburne Museum, rather than the Council, for the exclusive use by their visitors and not as a public car park.

Bathavon South:

Cllr Fiona Gourley – No comment.

Cllr Matt McCabe – No comment.

Bathwick:

Cllr Manda Rigby – No comment.

Cllr Toby Simon – No comment.

Chew Valley:

Cllr Anna Box – No comment.

Cllr Dave Harding – No comment.

Clutton & Farmborough:

Cllr Sam Ross - 3.10. of this proposal states: "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.”

The suggested charging structure for car parking is one of the means for BANES to influence people's choice of transport, but reliable public transport options need to be available to everyone, including rural communities, to enable people to access services and facilities without relying on a car (nearly 20% of households in BANES don't have a car - Census 2021).

In my Ward, there is limited, unsuitable or no public transport available to incentivise travel by alternative means into Bath for many commuters: the 522 being unsuitable for residents of Farmborough as it takes almost 90 minutes to reach Bath; Clutton and Chelwood having no regular bus to Bath; WESTlink proving far too unreliable for daily commuting, and Park and Ride being a limited alternative where work falls outside of the operational hours.

With the recent loss of many rural bus services, especially the 179 which was a busy and essential commuter bus, I am at a loss to understand what the incentives are for my residents, many of whom provide the workforce for the care, service and tourist industries and have no choice but to continue using their cars at the present time.

Before any changes are implemented on parking charges, alternative forms of transport for our rural communities need to be put in place to provide the incentive. A good place to start would be to extend the operating times for the existing Park and Ride sites around Bath to run 24/7. In addition, any revenue generated from car parking should be directed to improving Park and Ride services as well as being ring-fenced to subsidise timetabled bus services.

While future parking policies should be looking to control parking further to reduce congestion, pollution and road danger, they also need to consider the constraints imposed by a lack of alternatives for many of our residents.

Further information on parking policy from CPRE London

<https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/11/Parking-Transformed.pdf>

Response: The proposals for emission-based parking charges only affect those with more polluting vehicles, noting that the impact of air pollution has a significantly detrimental impact on the health of people living and working within the city, particularly the vulnerable.

Services designed to help commuters travel into the city centre more sustainably, such as our Park and Ride services where the service from Odd Down is located to serve visitors travelling into Bath from the south of the city, and these are unaffected by these proposals with charges remaining unchanged to incentivise behaviour change.

I note your comments regarding the services operating times. The council's cabinet agreed to proposals for a new Park and Ride contract for Bath on 5 May 2022 (item 70, report E3357 <https://democracy.bathnes.gov.uk/ieListDocuments.aspx?CId=122&MId=5522>).

This new contract operates on a gross cost basis with the Council retaining all future risk regarding to patronage. Within this report it was also agreed that parking charges could be implemented to any users to help offset the increased costs and operation of the service to ensure it remains viable. These parking charges were implemented in November 2022 and are chargeable only to those that use the sites to park, and do not use the bus service.

It was also agreed by Cabinet that the service financial model for the park and ride service will be reviewed at 6 monthly intervals to compare the actual income against the model and, subject to income levels reaching necessary gateway levels;

- a) Invest the additional income in increased service provision such as extended hours of operation and/or;*
- b) Reduce the fares charged for the Park & Ride service and/or;*
- c) Invest in improvements on the Park & Ride sites to improve the customer experience.*

Combe Down:

Cllr Onkar Saini – No comment.

Cllr Bharat Ramji Nathoo Pankhania – No comment.

High Littleton:

Cllr Ann Morgan – No comment.

Keynsham East:

Cllr Hal McFie – No comment.

Cllr Andy Wait – The documentation seems fine to me. I do have one question though. Why isn't B&NES considering the car parks in Keynsham as well?

Response: We are proposing to introduce emission-based charges for parking in Bath car parks only at this time due to the clean air directive.

Keynsham North:

Cllr Alex Beaumont – No comment.

Cllr George Leach – No comment.

Keynsham South:

Cllr David Biddleston – Unlike previous administrations, recently, those of us that serve on Keynsham Town Council have found that we have not been consulted on parking levies and changes. Could you please confirm that consultation with our local parish and town will take place?

Response: The informal consultation process involves all Ward Members being sent a copy of the number 1 report for proposals within their ward. As these proposals are based in Bath we would not usually be sending out this report to Ward Members in North East Somerset, however the decision was taken to carry out this extra level of consultation and send the report out to all Ward Members as the proposals at hand will have an impact on residents outside of the city. If Ward Members wish to pass on this informal consultation report to their Town Councils or Parish Councils they are welcome to do so at their discretion.

Parking Services will be undertaking a robust and proactive approach to engagement when the TRO consultation itself is due to commence. Whilst we're only legally required to publish adverts in the press, we'll be going far beyond this to ensure that stakeholder and customers are made aware of the proposals and how to comment. We'll ensure that all parish and town councils are contacted directly so that they may feed into the process.

Cllr Alan Hale - Whilst understanding the aims and intentions of the Administration, I am sure that one of the intentions is not to drive down the tourist trade or indeed the shopping trade in the city. I believe that this will be another nail in the coffin of trade and tourism in the centre of Bath. If evidence were needed, then the number of vacant and somewhat sad looking empty shops must bear witness.

I have given my opposition to this plan. The city needs to be flourishing and traders contented. Having seen the state of the city centre previously I went into Bath this morning and walked around the city centre, so an area bounded by High Street, Broad St, George St, Gay St, Barton St, Saw Cl, Kingsmead Sq, Westgate St and Cheap St. Within that boundary there are at least 21 vacant shops. I have photographs to back this up if needed. Whilst I think I understand what the Administration is trying to do I have to say that I fear for the future of the city. Whilst we will not be in control of all of the rent/rate factor for those and other premises I ask whether we as a council, you as an administration, are taking any action to ensure that the city retains its almost unique world heritage site in its entirety. Without that the financial bubble will burst as it will if tourists and indeed businesses see empty premises on every street. We must take some positive action to keep the city alive and kicking because if it fails then the remainder of the authority area will also feel the pain. What the Roman's started please do not let the Lib Dems finish because if the city goes down it will not come back up.

Kingsmead:

Cllr Paul Roper – No comment.

Cllr George Tomlin – No comment.

Lambridge:

Cllr Saskia Heijltjes – Same as below.

Cllr Joanna Wright – The suggested charging structure for car parking is one of the means for BANES to influence people's choice of transport. Reliable public transport options need to be available to everyone, including rural communities, to enable people to access services and facilities without relying on a car (nearly 20% of households in BANES don't have a car - Census 2021). Park and Ride sites in Bath should be offering buses 24/7 to allow people commuting at irregular hours. Any revenue generated from car parking would be directed to improving Park and Ride services as well as subsidised bus services. Future parking policies should be looking to control parking further to reduce congestion, pollution and road danger.

Lansdown:

Cllr Mark Elliott – No comment.

Cllr Lucy Hodge – No comment.

Mendip:

Cllr David Wood – No comment.

Midsomer Norton North:

Cllr Michael Auton – No comment.

Cllr Shaun Hughes – No comment.

Midsomer Norton Redfield:

Cllr Sarah Evans – No comment.

Cllr Tim Warren - Before being able to support this proposal I would need to know what benefits would be achieved, and weigh this against any detrimental effects this would have on the city centre. I understand that this council wants to reduce pollution which I'm sure we all agree with, but at present, I think added to the pressures caused by the pandemic and the war in the Ukraine this would be one step too far and could do untold harm to the city of Bath. We need to encourage visitors to the city and bolster the confidence of traders otherwise my fear would be that we'd have more empty shops.

Response: The benefits sought from these proposals are included broadly within section 4 of the TRO report, and continue the approach developed and

implemented with emission-based on street parking permits for residents, introduced in January 2022.

The introduction of emission-based charging in car parks therefore aims to improve the safety of vulnerable people within the community and city centre by improving air quality and reducing congestion so those motorists with more polluting vehicles are incentivised to change their behaviour and to consider making other more sustainable travel choices, such as the use of the Bath Park and Rides which will remain at current prices.

As set out in paragraph 3.6 of this report, drivers of vehicles that emit less than 131g/km (and are not diesel fuelled) will see no impact from these proposals.

Drivers of more polluting vehicles (those with diesel engines or a CO2 output of 131g/km or greater) are not prevented from using city centre car parks; however, the proportionally higher charges that these vehicles incur is aimed to raise awareness amongst drivers of the impacts of their travel choice. A reduction in pollutants at the tail pipe, broadly through the reduced or more efficient combustion of fossil fuels, will also reduce the level of other emissions such as CO2, which is itself a greenhouse gas, and therefore benefit the climate and nature emergency.

As detailed in paragraph 4.3, 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. Any reduction in emissions within the city centre will have a beneficial impact on those living and visiting the city centre.

It's anticipated that 66% of customers will be liable for a higher charge based on their emissions. The average increase for these customers is estimated to be £0.11 per hour, or roughly 9% of the existing average per hour charge paid by customers, although of course this will vary from customer to customer based on their own vehicle's emissions.

Charges for park and rides travel remain unchanged, with a two-way trip being available for as little as £2.80 per passenger when purchased in bundles of 10 journeys.

Regarding access to electric vehicle charge points there are 41.3 units per 100k population, which compares to 45.2 for the UK average. 30 new electric charging points were installed in 2022, bringing the total number available across Bath and Northeast Somerset to 50. In February 2023, the Cabinet Member for Climate and Sustainable Travel approved recommendations for a proposed trial of EV charging cable channel products. This report is available online at: <https://democracy.bathnes.gov.uk/mglIssueHistoryHome.aspx?IId=36528&PlanId=882&RPID=474625>.

Moorlands:

Cllr Jess David – No comment.

Newbridge:

Cllr Michelle O'Doherty – No comment.

Cllr Samantha Kelly – No comment.

Odd Down:

Cllr Steve Hedges – No comment.

Cllr Joel Hirst – No comment.

Oldfield Park:

Cllr Ian Halsall – No comment.

Peasedown St John:

Cllr Gavin Heathcote – No comment.

Cllr Karen Walker – Please don't even consider introducing Residents street parking or even introducing parking fees at the only car park we have in Peasedown St John. Parking costs of any sort would severely effect resident's finances.

Response: This report only proposes to introduce emission-based car park charges within Bath public car parks.

Publow & Whitchurch:

Cllr Paul May – No comment.

Radstock:

Cllr Chris Dando – No comment.

Cllr Lesley Mansell – No comment.

Saltford:

Cllr Duncan Hounsell – No comment.

Cllr Alison Streatfield-James – No comment.

Southdown:

Cllr Paul Crossley – No comment.

Cllr Dine Romero – As a ward councillor for an area with and surrounded by residents who are more likely to be less well-off and so less able to afford to change their vehicle for a newer one, this group will have increased during the current cost of living crisis. I am concerned that emissions-based parking charges will adversely affect those with socio-economic disadvantage; it should be noted that this category has cross-over with older people, women, people of colour, and with those with disability.

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.

Timsbury:

Cllr Shaun Stephenson-McGall – No comment.

Twerton:

Cllr Tim Ball – No comment.

Cllr Sarah Moore – No comment.

Walcot:

Cllr Oli Henman – No comment.

Cllr John Leach – No comment.

Westfield:

Cllr Dr Eleanor Jackson – We need to think of our residents, budgets stretched to the limit, who can't afford to upgrade their vehicles and who haven't got all day to wait around for buses which take all day to reach Bath, or simply no longer exist. It is not as though there are anything like enough electricity charging points, either.

Have you ever considered why the shops and businesses at Charlton Corner on the Frome Road (A362) in Radstock are so successful, not to mention PSJ Tesco and Co-op? They have free (private) parking for their clients on their doorsteps. When RADCO, Superstore, Westfield, ill-advisedly introduced charges for non-customers, their takings fell by a third in the six months they operated the scheme. Residents simply went elsewhere. The same would happen with the charges you are proposing, which would devastate the local economies in our wards.

Please don't even think of it for Midsomer Norton and Radstock. These retail centres are at breaking point already, and with the disastrous removal of the bus services from rural areas and outlying suburbs, such as the 82, some people whose finances are already fairly dire, will have to use older cars. Poor planning has in any case left a dearth of parking available in proportion to the requirements of

businesses and residents.

Response: This report only proposes to introduce emission-based car park charges within Bath public car parks.

The benefits sought from these proposals are included broadly within section 4 of the TRO report, and continue the approach developed and implemented with emission-based on street parking permits for residents, introduced in January 2022.

The introduction of emission-based charging in car parks therefore aims to improve the safety of vulnerable people within the community and city centre by improving air quality and reducing congestion so those motorists with more polluting vehicles are incentivised to change their behaviour and to consider making other more sustainable travel choices, such as the use of the Bath Park and Rides which will remain at current prices.

As set out in paragraph 3.6 of this report, drivers of vehicles that emit less than 131g/km (and are not diesel fuelled) will see no impact from these proposals.

Drivers of more polluting vehicles (those with diesel engines or a CO₂ output of 131g/km or greater) are not prevented from using city centre car parks; however, the proportionally higher charges that these vehicles incur is aimed to raise awareness amongst drivers of the impacts of their travel choice. A reduction in pollutants at the tail pipe, broadly through the reduced or more efficient combustion of fossil fuels, will also reduce the level of other emissions such as CO₂, which is itself a greenhouse gas, and therefore benefit the climate and nature emergency.

As detailed in paragraph 4.3, 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. Any reduction in emissions within the city centre will have a beneficial impact on those living and visiting the city centre.

It's anticipated that 66% of customers will be liable for a higher charge based on their emissions. The average increase for these customers is estimated to be £0.11 per hour, or roughly 9% of the existing average per hour charge paid by customers, although of course this will vary from customer to customer based on their own vehicle's emissions.

Charges for park and rides travel remain unchanged, with a two-way trip being available for as little as £2.80 per passenger when purchased in bundles of 10 journeys.

Regarding access to electric vehicle charge points there are 41.3 units per 100k population, which compares to 45.2 for the UK average. 30 new electric charging points were installed in 2022, bringing the total number available across Bath and Northeast Somerset to 50. In February 2023, the Cabinet Member for Climate and Sustainable Travel approved recommendations for a proposed trial of EV charging cable channel products. This report is available online at:

<https://democracy.bathnes.gov.uk/mglIssueHistoryHome.aspx?IId=36528&PlanId=882&RPID=474625>.

Cllr Robin Moss – No comment.

Westmorelands:

Cllr June Player – No comment.

Cllr Colin Blackburn – No comment.

Weston:

Cllr Malcolm Treby – From what I can see, am I correct that any petrol vehicle will face an increased charge, as even cars with an engine CC in the range 0 – 1550cc (i.e. even the smallest petrol vehicles) face increased charges, and that therefore only electric vehicles won't see an increase? I'm also unsure how this relates to the figure that 66% would see an increase in cost – surely if this is right the figure would be much higher than that?

Happy to be corrected if I have that wrong, but if not, given that the price of electric vehicles continues to make them prohibitive for a very large swathe of society, this charging seems unfair, but I'd be supportive if the charges for this lowest petrol engine size band ensured their prices weren't increased.

Response: These proposals are based on the same rationale and process adopted for the implementation of emission based on street resident parking permits developed in 2021 and implemented in January 2022.

Additional information on the rationale and processes is available within the consultation material and outcomes reports following consideration of public feedback which is published online and highlighted within paragraph 4.5 of the TRO report. Further information on emission-based permits is also available online at <https://beta.bathnes.gov.uk/apply-residents-parking-permit>

More specifically, I can confirm that the charge for engine CC only applies where the DVLA do not hold CO2 emissions data and therefore these categories only typically apply to older vehicles, though of course here may be exceptions.

Any petrol or LPG vehicle with CO2 emissions within the range of 1-130g/km of CO2 will therefore see no change in parking charges from these proposals. A diesel vehicle emitting between 1-130g/km will see an increase charge as diesel combustion results in higher emission of NO2 on a like for like basis against other fuels, even in newer euro 6 compliant vehicles.

Cllr Ruth Malloy – No comment.

Widcombe & Lyncombe:

Cllr Deborah Collins – No comment.

Cllr Alison Born – No comment.

Cabinet Member:

Cllr Manda Rigby - I approve this TRO and gave my detailed feedback prior to the consultation going out and which was incorporated into the paper.

8. RECOMMENDATION

As no significant objections and/or comments have been received following the informal consultation described above, the public advertisement of the Traffic Regulation Order should progress.



Paul Garrod
Traffic Management & Network Manager

Date: 23rd June 2023

9. DECISION

As the officer holding the above delegation, I approve the progression of this Traffic Regulation Order.

In taking this decision, I confirm that due regard has been given to the Council's public sector equality duty, which requires it to consider and think about how its policies or decisions may affect people who are protected under the Equality Act.

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

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

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



Chris Major
Director for Place Management

Date: 23/06/23

Appendix A

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

| (Hours – where available) | Existing Tariff | Emissions based charges | | | | | | | | | | |
|--|-----------------|-------------------------|----------------|----------------|----------------|----------------|----------------|---------------|-----------|-------------|-------------|-------------|
| | | 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) & 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 |

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

| (Hours – where available) | Existing Tariff | Emissions based charges - including Diesel charge | | | | | | | | | | |
|--|-----------------|---|----------------|----------------|----------------|----------------|----------------|---------------|-----------|-------------|-------------|-------------|
| | | 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) & 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 |

Appendix B – 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 C – Draft Equalities Impact Assessment