

**B&NES Parking Strategy – Stakeholder Questionnaire**  
**Response by Federation of Bath Residents' Associations (FOBRA)**

**Bath**

**Headline issues for Bath**

Thinking about parking supply and parking management in overall terms within Bath City Centre (including on-street and off-street parking in both public and private car parks):

1. Which elements of parking supply and management do you think currently work well?
  - Park and ride (P&R), although capable of significant improvement.
  - Off-street public parking.
  - On-street parking control in residential Outer Controlled Parking Zones (CPZ).
2. What do you see as the main problems and issues?
  - Excessive traffic and air pollution, which have consistently been the top concern of FOBRA members. Excessive traffic is linked to the level of parking provision in the centre. This affects not only the central area but also the radial routes into the city.
  - On-street parking for residents of the Central CPZ, which is difficult at all times.
  - Increasing demand for on-street parking in the centre and surrounding areas as a result of new and planned student accommodation and hotel developments.
  - Commuter parking spreading to streets in outer areas of the city.
3. What one issue would you consider it most important for the Parking Strategy to address for Bath?

The Parking Strategy should be explicitly based on a clear and consistent set of principles. We suggest:

- Parking strategy is an element of transport strategy.
- The overarching priority is to reduce traffic congestion and air pollution.  
[The Bath Transport Strategy has the vision of reducing the intrusion of vehicles especially in the historic core of the city; the Core Strategy and the Placemaking Plan both envisage a city centre free of all but essential traffic; the Public Realm and Movement Strategy calls for rebalancing the movement hierarchy giving priority to pedestrians, cyclists and public transport.]
- Parking control is an essential tool for managing traffic. Parking generates traffic; city centre parking generates traffic in the city centre and on the approaches.  
[This is recognised in the Bath Transport Strategy.]
- In residential areas, residents of the area should be given priority for on-street parking - 'Putting residents first'. All residential areas should be treated equitably and fairly.  
[All areas outside the city centre (which is defined in the Core Strategy, see map at Annex 1) are residential; and unusually for English cities there are also many residents within the city centre, whose needs should be considered.]
- Off-street and P&R parking capacity should support the commercial vitality of the city.
- Public off-street parking in the central area is a scarce resource. Pricing strategy should be used to prioritise use of off-street parking. Priority should be given to essential business uses, residents of outer areas of Bath, overnight visitors to the city and disabled drivers [see A.13].
- Commuters, shoppers and visitors from outside the city should be expected and encouraged to use firstly the P&R, and public off-street parking if they must drive in.
- Sufficient and attractive P&R facilities must be provided to enable excellent access to the city centre.

### Detailed issues for Bath

The development of the Enterprise Area sites in the City Centre (at Bath Quays/Manvers Street and Cattle Market) will affect existing public off-street parking (836 spaces). The Transport Strategy (Getting Around Bath) requires retention of at least 500 of these public parking spaces when these areas are built-out.

4. What role do you see these retained and improved parking spaces having/who do you think should be the priority users?
  - Essential business needs not met by private off-street parking.
  - Residents in outer areas of Bath, who need to come in to the city for their main shopping and for leisure, and should not be expected to drive *out* to the P&Rs. However the Council should aim to improve public transport within the city to encourage its use by residents as an alternative to driving in and parking.
  - Overnight visitors to the city.
5. Should the pricing strategy for this retained and improved parking be altered in any way to target different users?
  - Setting pricing for business users at a level which limits parking to essential business needs.
  - Differential (lower) pricing for Bath residents.
  - Differential pricing to encourage overnight hotel etc guests to use off-street parking.
  - Pricing for other users that encourages them to use the P&Rs or public transport rather than drive in to the centre.

There is already considerable congestion on radial routes into Bath and within the City Centre and work undertaken by the Council has shown that the ability to accommodate further traffic growth is very limited. Mindful of the development aspirations within the Enterprise Area to bring more investment and jobs into Bath, what is your view on the degree to which measures in the Parking Strategy should look to control car use for journeys into the City Centre for employment, shopping and other purposes? In particular:

6. The emerging Placemaking Plan, Districtwide, page 225, includes more restrictive parking standards for new non-residential development in Bath. In addition to these new standards, what other measures would you consider necessary or desirable to help support these?
  - Planning control should be used to manage the demand for parking. Parking standards should not be relaxed out of concern that parking will overspill onto local streets. Development applications should be refused where they would exceed parking standards or cause overspill.
  - In considering applications for new hotel and entertainment developments, their potential to generate high on-street parking demand in the evenings and overnight should be taken into account.
  - At present B&NES proposes to have one set of parking standards for the City Centre, which is a very small area bounded by George Street, Charlotte Street and the River Avon [see Annex 1], and another for the remainder of the city. We strongly urge that the remainder of the city should have parking standards appropriate to the area concerned eg. more restrictive standards within the Enterprise Area, particularly those parts immediately adjoining the city centre.
7. The emerging Placemaking Plan makes provision for the potential future expansion of existing Park and Ride sites and the creation of a new Park and Ride site to the East of Bath. What other measures, would you consider necessary or desirable to greater encourage use of Park and Ride?
  - FOBRA has consistently supported the creation of a P&R to the east of Bath, and believes that this is an essential component of the Bath Transport Strategy. As parking in the city centre is restricted, an

eastern P&R will be necessary to provide access from the east. In addition, the eastern P&R will be required to accommodate the increased demand arising from development of the Enterprise Area.

- The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. There should be a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses, perhaps paid for by the accommodation sector or a broader tourism grouping. Currently hotels are under construction in Bath which offer no parking facilities for guests. The Council should take steps to prevent overnight parking by hotel guests on nearby residential streets.
- More attractive pricing arrangements should be considered eg. parking fees rather than bus fares. For 4 people in a car it is cheaper to drive in to Bath and park than to use the P&R. Pricing should incentivise overnight P&R use when it is introduced.
- Use of P&Rs could be further diversified and expanded, as is done elsewhere in England. They could be used to help in reducing congestion caused by school children deliveries, and for delivery of purchases from city centre shops (as in Cambridge).
- Creation of P&Rs for Bath should not necessarily cease at four, but continue to meet demand, as has been found necessary in other cities which use them successfully (eg Cambridge, York, Oxford....). Another P&R might be needed on the A36 from Warminster, for example.
- It would worth considering making a small number of interim stops on some of the P&R routes (eg Bear Flat, St Stephen's Church), at least when scheduled buses are cancelled or delayed.

8. Do you support the principle of higher charges for central area parking as part of a package of measures to help manage traffic within Bath?

- Yes, but not to the extent of penalising residents of the area. The central area has a mixed population, many not particularly well-off, and increased resident parking charges would impose an unfair burden.
- The Placemaking Plan (Part 2, page 4, paragraph 21), recognises the important role played by residents in the central area and includes a commitment to support them:  
"Some ten thousand people, including many families, live in central Bath. This large number of residents contributes to the vitality and vibrancy of Bath, day and night; and to the special character of the city centre. Owner-occupiers care for the historic Georgian houses everywhere in Bath at their own expense. The Council will encourage and support residents in central Bath".

9. Do you support the principle of further reducing off-street public parking (beyond that envisaged in the Placemaking Plan) to help manage traffic within Bath?

- Yes. We also want to see *on-street* pay and display (P&D) parking reduced in the Central CPZ, particularly in the residential area to the north of the City Centre. This would be consistent with the aim of reducing congestion and air pollution, and also help central area residents. Most of the bays in the Central CPZ are available for P&D at present. This attracts traffic into the central area, where people drive round looking for an on-street parking space and add to the congestion and air pollution. When the Central CPZ was originally created in the 1970s the aim was to discourage parking in the centre. This has now been completely reversed with the creation of the Outer Zones, where there is little non-resident parking, surrounding the centre. The Central CPZ is now the only area of controlled parking which is almost entirely P&D.
- One possibility would be to reduce the *duration* of stay in P&D bays that are retained. Some could be very short duration (eg 20 minutes) for quick transactions.

10. Could the level of parking retained within the Enterprise Area be reduced from 500 in order to support the overarching policy of reducing traffic within the city centre?

- Yes, with additional capacity provided at the P&Rs if necessary.
11. Do you think further expansion of the controlled parking zones will be necessary to discourage commuter on-street parking in areas surrounding the City Centre?
- Yes. Commuter parking now spreads well outside the city centre to areas such as Bear Flat. New CPZs in such areas would encourage commuters to use the P&Rs and stop the residential areas being overwhelmed by commuters' cars.
  - The city centre is already surrounded by controlled parking zones. It may be necessary to increase the proportion of 'permit-holder only' spaces in those areas as well as the Central CPZ. On the other hand, some controlled areas have low on-street occupancy and some relaxation may be possible in such areas.
12. How well do you think the City currently caters for parking demands associated with major events such as the Christmas Market, Bath RFC matches etc. How could this be improved?
- Badly. The Council should actively *manage* demand and not simply seek to accommodate it. Events likely to generate excessive demand should be deconflicted if possible.
  - The Christmas Market imposes severe pressure on parking in the city. It is almost the only time during the year when all the car parks and the P&Rs are full, and the predictable result is that the city becomes severely congested. The Council should consider whether it is in the overall interest of the city and its residents to allow the Christmas Market to continue on its present scale. It should certainly not permit the market to be expanded in scale or duration.
  - The organisers of other events such as rugby matches, University open days and the Boules Tournament should be required to agree travel plans with the Council which aim to minimise traffic into the city. Parking control would be an important element.
  - Traffic and parking should be major considerations in assessing new developments such as the rugby ground and student housing.
13. What are your views on the current provision for disabled parking, taxis or cycle parking within the City Centre?
- Disabled parking provision is limited, with the result that Blue Badge holders park on double yellow lines in the centre. Consideration should be given to creating a central off street parking place for disabled badge holders, for example in the Broad Street car park, which would provide good access to Milsom Street and other areas of the centre.
  - Enforcement to reduce abuses of Blue Badges is essential, especially given that they are used on double yellow lines.
14. What role do you see for new technology in helping to manage parking within Bath?
- Technology could be used for innovative demand-based pricing for off-street parking and possibly the P&R.
  - Congestion charging, facilitated by new technology, could help reduce the demand for parking in central Bath and encourage use of P&R.
15. Are there any other comments you would like to make about parking in Bath?

On-street parking

- Hotels, guest houses, B&Bs and holiday rentals receive on-street parking permits at ludicrously low prices - £80 each for the first five permits, less than the cost of a resident vehicle permit. For this they have access to parking worth an annual £6,800 on city centre streets, or £3000 in Charlotte Street. Where space allows it might be reasonable to continue with these permits, but the cost should be raised to reflect their value. In areas under severe parking pressure such as Zone 1 or the Central Zone, these permits should be discontinued and the visitors encouraged to use off-street parking – or P&R when these operate overnight. These permits were introduced in the Central Zone some five years ago without any public consultation.
- In the interests of fairness and equity between residential areas, residents in the northern, residential, part of the Central CPZ should have access to resident visitor permits as is the case in all the other residential parking zones.
- B&NES should consider rationalising the current plethora of Controlled Parking Zones. There are currently 13 CPZ in and around the centre, some operating for 6 days a week, some for 7, and with varying proportions of 'permit-holder only' spaces and occupancy.
- B&NES Council should consider introducing a system of resident vehicle parking permits that takes account of vehicle size or emissions class. This type of scheme is already common in London and some other cities. It encourages owners to use smaller vehicles rather than larger ones which usually take up more space and are generally less environmentally friendly. This is a link to the system used in Lambeth <https://www.lambeth.gov.uk/sites/default/files/pts-emission-price-plan.pdf>
- The Council should consider refusing parking permit to students, who do not contribute to the city infrastructure through the Council tax. This would reduce the demand for on-street parking throughout Bath and in particular areas that suffer overly from HMO accommodation. If a student elects to pay council tax then they should be allowed a permit.

#### Other issues

- B&NES should address the parking implications of the creation of Houses in Multiple Occupation (HMOs). The conversion of a single dwelling into an HMO has the potential to multiply the number of parking permits available to the property, putting additional pressure on parking in the area. This should be factor in assessing whether to approve an application for an HMO, and the Planning Authority should be able to apply conditions limiting the number of parking permits than can be issued.
- Coach parking should be included within the scope of the study. With the redevelopment of Avon Street and the need to find alternative coach drop-off/parking, there is an opportunity to reduce congestion and air pollution by selecting suitable locations for coach facilities. Coach parking facilities should be located away from the centre, possibly at the P&Rs. A drop-off site should be located on the edge of the city centre, or within a reasonable walk from it.
- B&NES should consider a workplace parking levy on the lines of that scheme operating successfully in Nottingham.
- Could private off-street parking, for example at supermarkets, be made available for visitors during 'silent hours', with appropriate payment?
- Effective enforcement of parking controls is vital.

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