To: **Bath & North East Somerset Council, Parking Services**

From: **Richard Brown, Circus Area Residents Association**

Date: **October 16 2017**

Title: **Parking Strategy - CARA’s response to consultation**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

This paper represents the response to the paper “Balancing Your Needs: A parking strategy for Bath & North East Somerset” issued by Bath & North East Somerset Council (B&NES) as part of the consultation process.

The response in this paper relates to the Parking Strategy paper only. Comments on the concurrent Bath Coach Parking Strategy are contained in the paper ‘Bath Coach Parking Strategy – CARA’s response to consultation’.

**Introduction**

The Circus Area Residents Association (CARA) represents over 850 households in over 350 houses in the area of Bath covered in Appendix 1.

The Circus in Bath – the heart of the CARA area - is a spectacular circular development of 33 houses in 3 terraces designed by John Wood the Elder and completed by his son, John Wood the Younger between 1754 and 1766. Its architectural significance is internationally recognised and reflected in the Grade 1 Listed Building status of the buildings and its specific reference in UNESCO’s World Heritage Site inscription of Bath as a site of Outstanding Universal Value. The area surrounding The Circus, and also falling within the CARA catchment area, is also of material architectural significance and includes other buildings designed by the Woods, father and son. Two of these streets, Bennett Street and Gay Street, are the main entry streets to The Circus and, as such, carry similar heavy traffic levels.

CARA has adopted ‘Traffic Management’ as one of its priority objectives reflecting the intent by its members:

* To reduce car traffic volume and improve traffic flow in the CARA area. This principally relates not only to the main traffic route of Gay Street – The Circus – Bennett Street (which sees a large amount of ‘rat-run’ traffic) but also to surrounding streets. A large amount of this traffic comes from cars, vans and coaches entering and circling The Circus and nearby streets in search of parking spaces.
* To eradicate coach traffic in the CARA area. This principally relates to the main traffic route of Gay Street – The Circus – Bennett Street but also includes surrounding streets. CARA issued a paper “Traffic Management in The Circus area” on August 3 2017 to request action by B&NES to prohibit coach (and heavy goods traffic) in this residential and important heritage area.
* To improve air quality in the CARA area.

**Comments on Parking Strategy**

CARA supports the aim of the strategy which is “*to help improve the quality of life of the people of Bath and North East Somerset by establishing a balance between the social, economic, cultural and environmental needs of the whole community. In particular, the Parking Strategy supports the need to reduce the level of intrusion of vehicles into urban centres, reflecting concerns about the impact of traffic congestion on the environment and air quality, as well as the need to protect the historic fabric of the World Heritage Site in Bath***.”**

Further, CARA is, in general, supportive of the underlying aims of the Parking Strategy to:

* Prioritise the parking needs of residents and disabled users.
* Reduce areas of congestion with the knock-on effect of better air quality.
* Support local business.
* Balance increased demand for parking against limited availability in the city.
* Support the regeneration of our key towns.
* Tailor solutions to the needs of different areas.

In respect of specific proposals, we comment as follows:

1. **Parking Standards**

No specific comments.

1. **Managing On Street Parking**

We SUPPORT proposals to:

* Introduce a ‘Hierarchy of Kerb Space’ (Objective PSO 6) where there will be a priority for on-street (kerb) parking, with the aim of putting residents, disabled users and local businesses first. We do not believe that short stay or long stay parking should have equal access to on-street parking in our residential community.
* Review the available permit types (Action PSA 3) and remove those that do not comply with the objectives and policies of this strategy. We are, for example, strongly against Central Zone holiday-let and hotel guest permits. These permits facilitate long-term on-street parking reducing the parking options for residents and, being priced at a lower level than resident permits, are effectively subsidized by residents.

HOWEVER, we comment further that we:

* Are against the proposal in Objective PSO 7 for Disabled Users and Other Blue Badge Holders (together, ‘blue badge holders’) to have priority over local residents. Our community is situated in Bath City Centre and, as such, is very close to the main shopping, entertainment and tourism/leisure sites. We are concerned that blue badge holders accessing the city centre take a material share of the limited on-street parking space.
* Seek more resident-only bays, with shorter time restrictions for pay & display, and Sunday restrictions.
	+ Residents have, currently, almost no priority in the CARA area and, against the difficulty of accessing parking during the day (competing against commuters/shoppers) and in the evening (competing against ‘night-time economy’ consumers), we push for a material improvement in the availability of resident-only parking.
	+ Parking conditions are elevated on Sunday when there is no effective parking control. We seek an extension of parking control to 7 days a week.
* Seek visitor permits for residents in the Central Zone (such permits are available in other resident zones in Bath).
* Believe that Central Zone holiday-let and hotel guest permits are too freely available and are priced too low (as above). We are also frustrated that students are eligible for residents’ permits (despite university/student housing providers restrictions on student car usage).
1. **Managing Public Off Street Parking**

We SUPPORT proposals to:

* Encourage greater use of Park & Ride sites on the outskirts of the city (Objective PSO 16) especially among long-stay users/commuters – with the aim of reducing congestion in the city and on arterial routes.
1. **Private Non-residential Parking**

No specific comments.

1. **Parking charges**

We SUPPORT proposals to:

* Review on-street parking tariffs in Bath (Objective PSO 22).

HOWEVER, we:

* Emphasise that short-stay and long-stay parking tariffs should be disproportionately high to discourage non-resident on-street parking in this residential community. There is ample off-street parking in the nearby Charlotte Street car park.
* Believe that the cost of resident parking permits in the Central Zone is too high.
1. **Multi Modal Parking**

We SUPPORT proposals to:

* Encourage the provision of car clubs in central Bath (Objective PSO 24).
* Support an increase in the number of electric vehicle charging points on-street and within car parks (Objective PSO 25).
* Reduce disruption to residents caused by insensitive on-street coach parking in Bath.
* Promote access restrictions for good vehicles and to take steps towards a traffic free city centre, with the aim of relieving congestion and improving air quality and public health. We are supportive of both Objective PSO 29 (ensuring suitable provision of unloading/loading space to support local businesses and operations) and Objective PSO 30 (restricting hours of access for servicing/delivery vehicles in the centre of Bath if required to support the delivery of public realm improvements).

HOWEVER, we comment further that we:

* Have material concerns over the proposed Bath Coach Parking Strategy and have commented in greater detail in our concurrent response.
1. **Information and Enforcement**

We SUPPORT proposals to:

* Improve parking enforcement and signage. Under Objective PSO 31, parking enforcement should facilitate protection of road space in order to maintain free flow of traffic in the network, ensure off‐street parking is used as intended, encourage education of motorists to avoid penalties and ensure the protection of pedestrian safety.

HOWEVER, we comment further that we:

* See evidences of blue badge abuse in our residential community with adverse implications for parking options for our residents. As such, we support B&NES’ efforts at enforcement on illegal blue badge usage.
* Have material concerns at the growth of unofficial taxi ranks in Bath. One example is in The Circus where mini cabs park on the central, single yellow line, area to wait for a hire.
1. **Major Events**

We SUPPORT proposals to:

* Better co-ordinate and manage parking for major events to reduce the adverse impact on residents arising from these events. We support Action PSA 20 (enhanced collaboration among organisers of major events through the establishment of a Joint Events Management Transport Stakeholder Group) and Action PSA 21 (development of a framework and good practice guidance on parking management for use by those responsible for managing events).

**Conclusion**

The Circus Area Residents Association (CARA) has adopted ‘Traffic Management’ as one of its priority objectives. This reflects the intent by its members to reduce car traffic volume and improve traffic flow in the CARA area, to eradicate coach traffic in the CARA area and to improve air quality in the CARA area.

CARA SUPPORTS the aim of the proposed Parking Strategy which is “*to help improve the quality of life of the people of Bath and North East Somerset...(and) to reduce the level of intrusion of vehicles into urban centres, reflecting concerns about the impact of traffic congestion on the environment and air quality, as well as the need to protect the historic fabric of the World Heritage Site in Bath***.”**

Further, CARA is, in general, supportive of the underlying aims of the Parking Strategy to, amongst others, prioritise the parking needs of residents and to reduce areas of congestion with the knock-on effect of better air quality.

HOWEVER, as highlighted above, we have raised specific issues relating to ensuring the strict priority of residents in the ‘Hierarchy of Kerb Space’ at the expense of non-residents who should be pushed to off-street parking and the availability of visitor parking permits. We believe that B&NES should “put residents first”.

**Appendix 1 – CARA catchment area**

