



NAILSWORTH TOWN COUNCIL

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Nailsworth Town Council Response to SDC Parking Review Proposal

27 July 2018

1 Purpose of the Review

The Review is not consistent with Councils' legal powers to set parking charges (to 'secure the expeditious, convenient and safe movement of vehicles and other traffic in the locality' along with air quality, amenity, access to premises, access for emergency vehicles. (Officer Report to S&R, 14/06/18: 2.4).

- The specification of the task in the ARUP letter is not neutral and refers to opportunities for introducing payments.
- Statements by SDC Cllrs:
 - In a public meeting on November 18th in Nailsworth an SDC Cllr said that it was 'Parking Charges or the CAB'.
 - At a meeting of the Nailsworth Chamber of Trade on 30th January an SDC Cllr said to over 35 attendees that parking charges were required to pay for services and that the CAB was at risk. The Cllr also indicated that spaces in Nailsworth were taken up by workers.
- Examples of email and statements from key Labour people such as:
"Thanks. I'll pass your remarks on as this is a matter for SDC. However such is their financial problems that they will have to find the money potentially raised elsewhere. Other communities including my own in Stonehouse will also have a view as they are currently subsidising Nailsworth and they may have to stop.
Yours sincerely,
David Drew MP"
- Statement of Purpose in the report:
2.1 This report reviews the case for introducing charges in Cainscross, Dursley, Minchinhampton, Nailsworth, Stratford Park (Stroud) and Wotton-under-Edge. The report lays out the rationale for the legal introduction of charges and seeks member approval to take the Draft Variation Order out to consultation.

This report is not about managing car parks to encourage shoppers and visitors (as claimed in S&R 1.3, 13.1, 13.2) to maintain the vitality of town centres. Nor does it appear to begin with a neutral view of whether charging is required.

2 Process

The process is deeply flawed and appears to have been designed to achieve a particular outcome, rather than to look objectively at the evidence. The procurement process is unclear and poorly documented.

- There does not appear to be a definitive letter/statement from SDC that appoints Arup as contractor.
- We understand that Officers had an initial scoping conversation with Arup at a face to face meeting on 9 November 2017 regarding the car parking study. Following this meeting Arup then submitted their proposal letter dated 27 November 2017. However, apart from the signatures on the ARUP letter there doesn't appear to be any recorded communication from SDC to ARUP regarding this important contract.
- We have concerns about the true cost of the Report. The work was not put out to tender, but the ARUP letter, which is the only document made public, shows a cost of £9,950 - just under £10,000. However a significant proportion of the work was carried out by SDC staff and should be added to the total cost of ARUP's report for procurement assessment purposes.

- There has been what we consider to be a disappointing approach to the consultation by SDC Officers.
 - At the initial, informal, meeting on 18th Dec we indicated we looked forward to working with SDC.
 - Subsequently we made an informal Officer to Officer approach indicating that we were very happy to work together on innovative solutions to any problems that might be identified but received no response.
 - When the Mayor met the Chief Exec of SDC on 1st May, Car Parking Charges were one item discussed. In response to the statement from him that SDC had evidence that charges did not damage towns the Mayor said that Nailsworth had evidence stating that charges did damage towns. We would have been happy to discuss this, but there was no follow up.
- The lack of response to the questions initially put forward by NTC for the SDC S&R meeting. NTC had asked around 40 questions, but were informed that they were only allowed 3 at that meeting. It was noted that the original 40 questions would be forwarded to be considered in the consultation process. An early response to these questions would have been helpful in formulating this Consultation Response.
- The mix-up over the meeting that Officers arranged for 26th June. In response to a request from our Clerk as to whether this was part of the consultation or informal, the reply stated that the meeting was informal.
On discovering that there were no members of the public coming to this ‘informal’ meeting, SDC Officers cancelled it and enquired about coming to an NTC meeting, either the 17th July Full Council meeting or the 10th July NTC Special Council meeting arranged for us to consult with local people.
- The inaccurate public statement in the media from an SDC spokesperson that we had not allowed the officers to speak at our meeting. In fact Joanne Jordan approached the Chair 2 minutes before the meeting started asking “How are we going to run this?”. She was advised this was a Council meeting and there was opportunity for everyone to ask or answer questions after the presentation. There had been no previous contact regarding formal input by SDC Officers for this NTC meeting.

Such a deeply flawed process cannot legitimately be used to introduce parking charges. Several opportunities for dialogue were not taken.

[3 Evidence - Arup's report](#)

The report is inadequate conceptually and in the partial and flawed evidence it assembles.

- Incomplete and misleading assessment
 - No impact assessment on the vitality of the town centre
 - No equality impact assessment
 - No environmental evidence of pollution
 - No evidence that Parking in Nailsworth is causing congestion, or pollution problems.
 - No measures of congestion, movement of vehicles etc. is made even though this is given as the legal basis for imposing parking charges
 - No consideration/modelling of effects of charges in SDC car parks on private car parks or on street parking, or of congestion caused by search for free on street spaces
- The indication of Market Rasen as supporting the introduction of charges, when in fact the evidence from there is diametrically opposed to this.
- Only three days of evidence collection took place. Given the small number of days there should have been good scrutiny of the data.

- It is claimed that the surveys were carried out on typical days and to industry standards. However, the Saturday figures, which provide incongruous data, were collected on a home FGR matchday. This would have completely skewed the results for that Saturday and should, at the very least, have been stated in the report.
- The incorrect assumption that occasionally full car parks means there is no churn and spaces are taken up by workers. This assumption cannot be drawn from the data collected. The whole process falls down on this simple fact.
- There is significant churn in Nailsworth with vacant parking spaces continually becoming available. To evidence this NTC captured Time Lapse video over three week days and a Saturday, capturing frames every 15 mins. **The Videos can be seen at http://bit.ly/Park_Video**
- Other supporting evidence collected by NTC
- A survey of parkers showed that 80% are visiting for shops and services, over 75% visit at least once a week
- Carried out between 5th and 9th July, asking only those that had been seen to park in SDC carparks. **Results in pie charts attached.**
- An Independent Retailers survey showed that 90% said there would be a negative effect on their business, with 9% stating they would definitely have to close.
- 44 Independent Retailers asked between 5th and 7th July. **Results in pie chart attached.**

There are numerous inaccuracies and omissions in the ARUP report; no evidence of a congestion problem is presented and NTC research demonstrates there is significant churn in Nailsworth car parks.

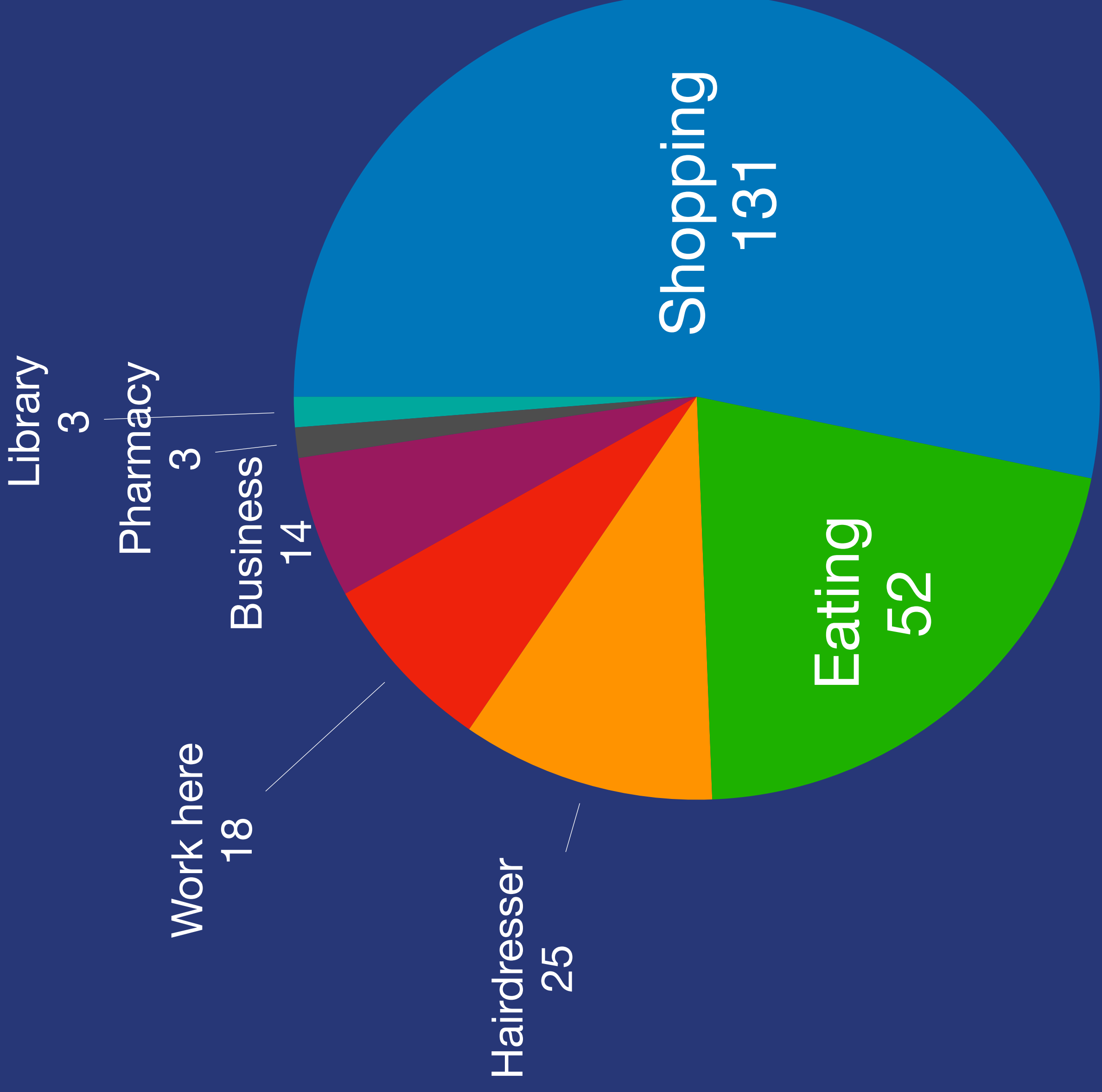
Summing up Comment

- We consider that the Arup report is not fit for purpose.
- We understand SDC have statutory duty to assess Parking provision in the district. Instead of entering in a divisive and flawed process with a stated aim of finding a legal way of charging in car parks the Council should have engaged with its Town and Parish councils and worked in partnership with them to resolve the funding problem.
- SDC policy attempts to impose a uniformity across the district rather than responding to the different needs of the towns and locations.
- There is overwhelming and well-informed public opposition to parking charges and NTC is energised by this and by the clear desire of local people to protect their town.
- The downside risks of these proposals are enormous in terms of their social, economic and amenity impact on the town and its future viability. The potential gains are limited to a very modest revenue increase to SDC. We reiterate there is not a congestion or parking problem in Nailsworth that needs to be addressed through charging.
- The inadequacies of the process and the risks to the town mean we reserve the right to take this to Judicial Review.

Nailsworth Town Council

Don't take the **P**out of Nailsworth

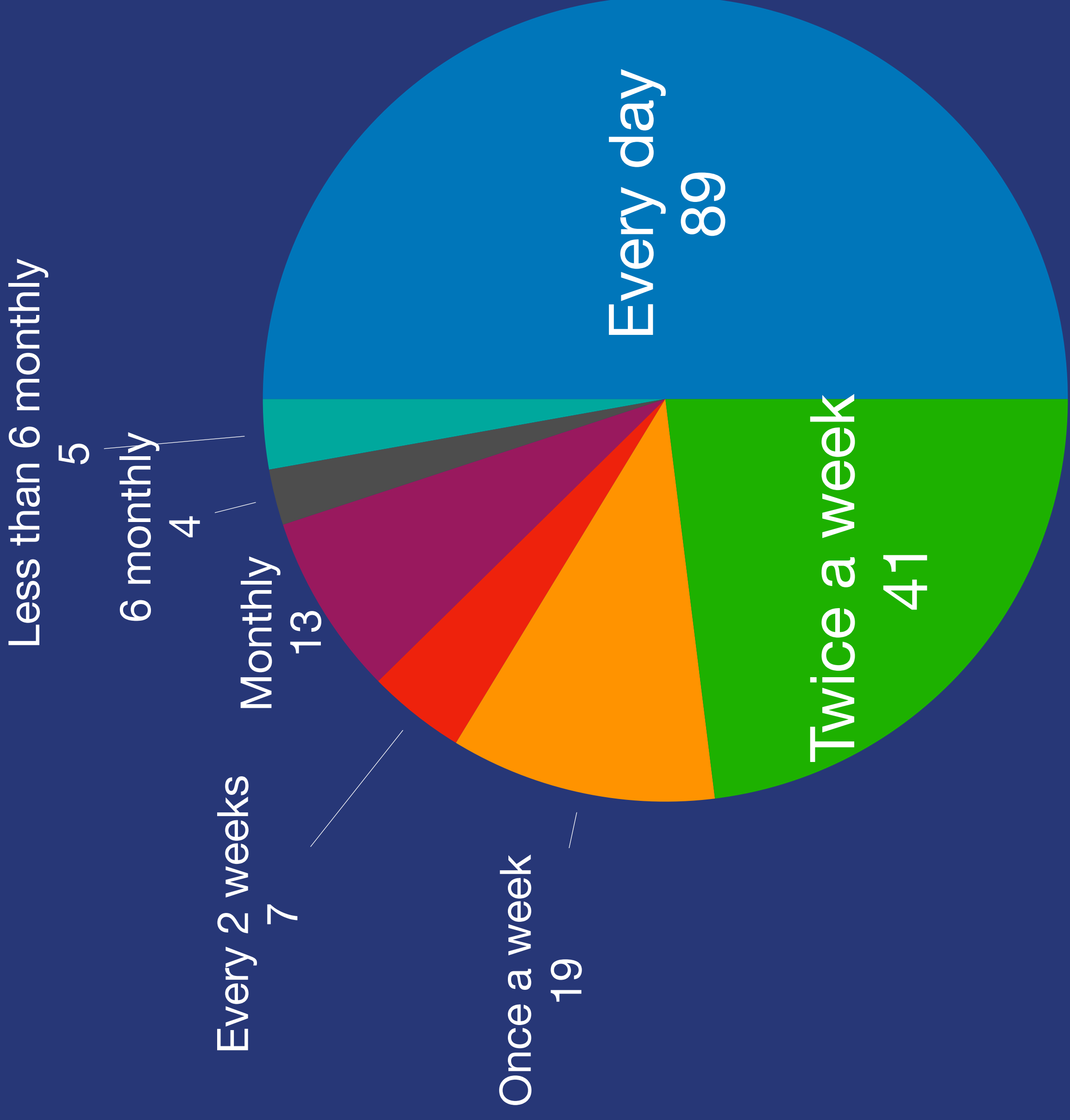
Why do people come to Nailsworth?



178 respondents
Some come here for multiple reasons

Don't take the **P** out of Nailsworth

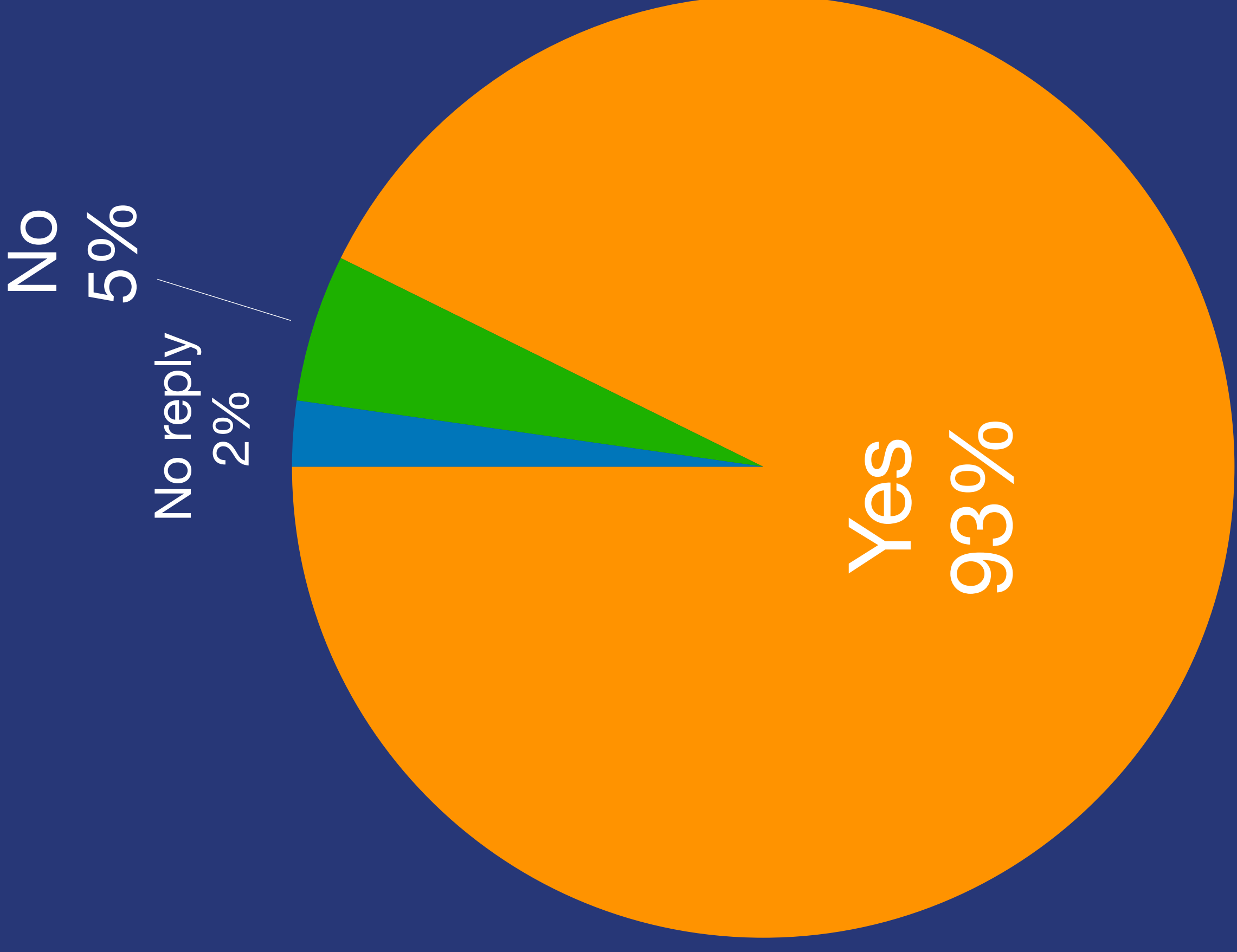
How often do people come to Nailsworth?



178 respondents

Don't take the **P** out of Nailsworth

Would you seek out free spaces?

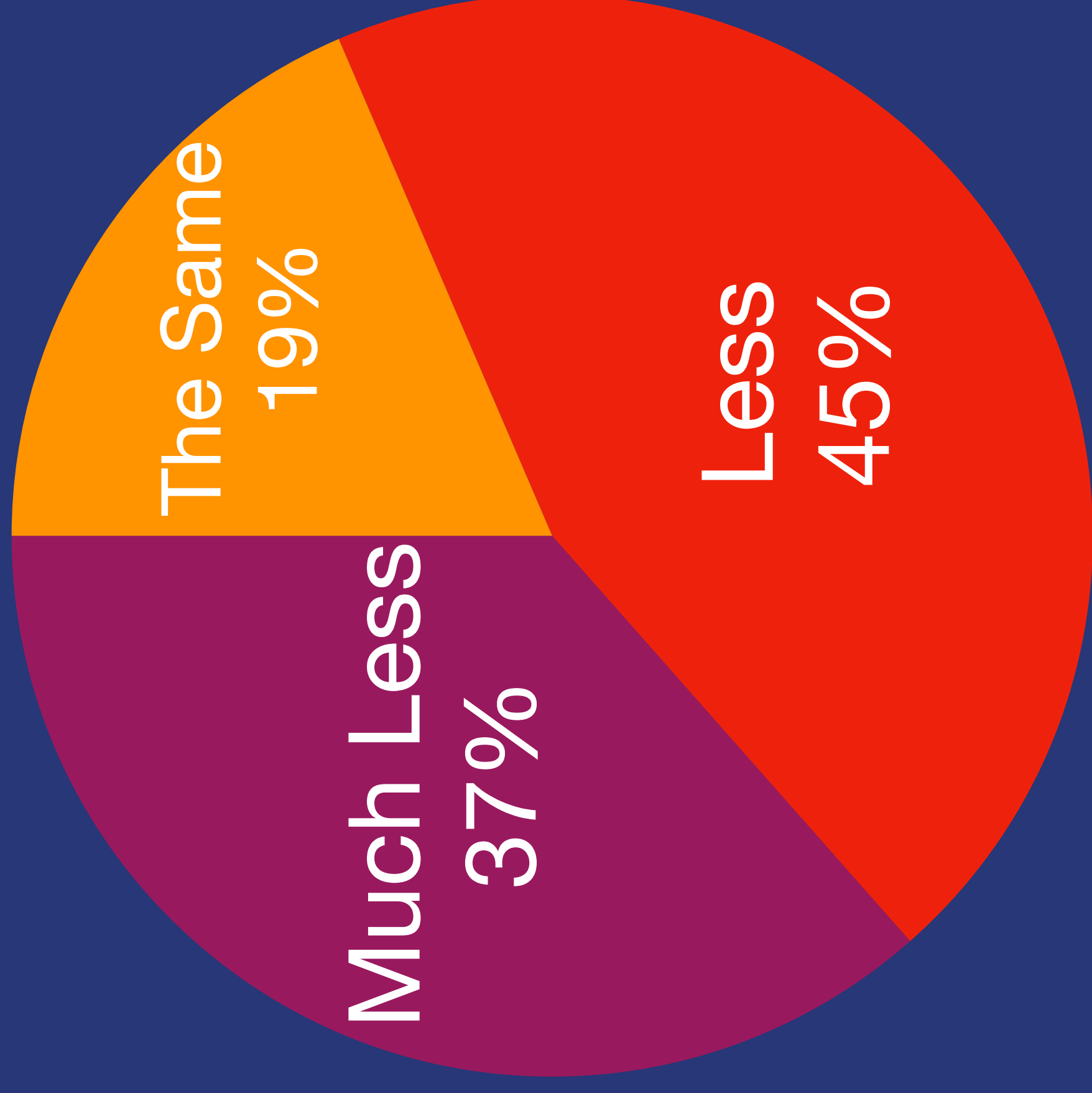


178 respondents

Don't take the **P** out of Nailsworth

No one said they would visit more

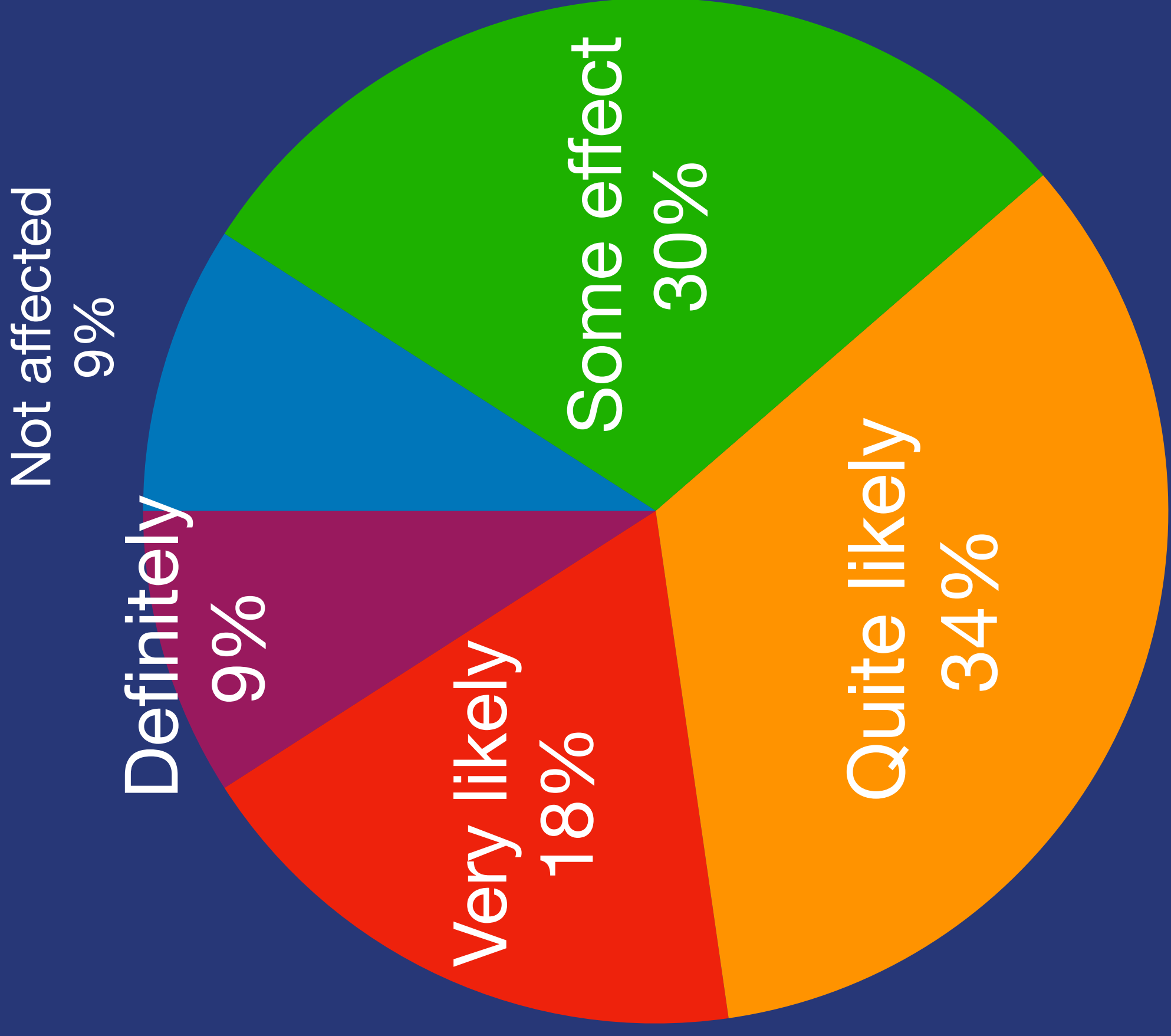
Visiting frequency if charges imposed



178 respondents

Don't take the **P** out of Nailsworth

Would your business close?



44 respondents
All independent retailers