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Cllr. Hannah Young
Executive Member for Business Economy and Employment
North Somerset Council
Town Hall,
Walliscote Grove Road,
Weston-super-Mare,
BS23 1UJ

2nd May 2024

Dear Cllr. Young

Re. North Somerset Council Parking Management Strategy Consultation 2024

I am writing on behalf of Nailsea Town Council in response to North Somerset Council's Parking Management Strategy consultation. The Town Council has chosen to respond by letter. It was felt that the wording of the questionnaire is exceptionally leading and, on that basis, we felt it was unsuitable to capture our comments.

Section 1 Parking Management Strategy: Vision and Objectives

1.1 Nailsea Town Council does not see how the strategy meets the current and future needs of Nailsea. It neither supports our local economy or responds to the challenges of the climate emergency. It is not clear how the introduction of parking charges upholds NSC ambitions for a health community with safe and attractive places for residents and visitors to use.

The introduction of parking charges will not meet the economic needs of Nailsea. Car journeys are necessary without the support of affordable and reliable public transport, which takes people to where they want to be.

The parking in Nailsea is unlikely to be self-funding. The current car park users will look elsewhere to park e.g. Crown Glass Shopping Centre car park, Waitrose and Tesco's. The income from parking charges will not cover the ongoing costs for such a scheme, nor touch the costs of making improvements to Clevedon Road or Station Road. Going forward will Nailsea residents be subsidising a scheme which they did not support in the first place?

1.1a A parking strategy may work in a 'destination town' but not in a service town such as Nailsea which has no main road travelling through it.

1.2 Fair and consistent (see above)

Effective Traffic Management reducing congestion and air pollution.

Nailsea neither has an issue with congestion or air pollution. The introduction of parking charges is anticipated to lead to congestion, as people park in residential areas, narrowing roads and therefore restricting access.

Maintain, invest improve quality and safety of parking....how? NSC cannot afford new CCTV or to correct structural issues.

Encourages sustainable travel and supports climate emergency goals...how? It is unclear how the Nailsea proposals meet these objectives.

Minimise the potentially negative impacts on residential parking and schools. The loss of free parking in Nailsea will definitely have a negative impact on residential communities, as drivers seek out free alternatives. Nailsea schools are not affected by car parking issues.

1.3 Will the Parking Management Strategy help address parking challenges?

No. Nailsea does not experience the issues found in Weston, Clevedon and Portishead. Paid parking will lead to drivers parking in residential roads and creating an issue that previously did not exist. Nailsea Town Council is very aware of the digital divide and the difficulty some people experience with using apps to pay for parking or even owning the technology to enable them to pay for parking.

Section 2 Introduction of charges to car parks and on street locations

- 2.1 Nailsea, Clevedon Road car park, Station Road car park and the Town Centre
- 2.2 What works well and what doesn't currently?

Nailsea has a mix of long and short stay parking, which appears to be at the right level to ensure the turnover of parking spaces throughout the day, plus catering for long stay parking to prevent it spilling out into residential streets.

The main problems are the poor upkeep of the existing assets with surfaces deteriorating and the lines of the bays fading.

- 2.3 How do you think the parking provision can be improved?

 Nailsea parking requires no improvement or enhancement other that repairing the existing surfaces.
- 2.4 What are the potential Impacts of the Strategy?

The potential impacts are negative for businesses as employees will struggle to find free parking and there is a lack of viable public transport in Nailsea to use as an alternative. Visitors including shoppers, will park in the free-to-use car parks in the town or will take their business to out-of-town shopping centres, which offer free parking. This loss of customers will affect Nailsea businesses greatly. The lack of trade could eventually lead to businesses failing and the closure of town centre shops and businesses, as a result. Businesses may relocate out of Nailsea to accommodate employee and customer parking.

2.5 What local considerations should be taken into account when considering if there is a need for a pay and display machine?

Nailsea has an aging population with census data supporting this information. Age UK data from 2022 states the following:

The majority of older people use a mobile phone, but many do not have a smartphone. At the end of 2022 in the UK:

- 13% (around 1.6 million) of people aged 65 & over in the UK did not use a mobile.
- 87% (around 10.9 million) of people aged 65 & over in the UK used a mobile phone, including:
- ➤ 58% (around 7.3 million) of people aged 65 & over in the UK used a smartphone.
- \geq 27% (around 3.4 million) of people aged 65 & over in the UK used a mobile which was not a smartphone.

Based on these statistics 13% have no access to a mobile phone at all and a further 27% of people in Nailsea aged over 65 do not have a smartphone and therefore will be unable to download apps to enable them to use the 'Smart' pay and display machine. It is likely to be a barrier for some residents and visitors who won't have the confidence that they will have the ability to pay for their parking, using an app. Nailsea Town Council is totally opposed to the use of pay and display machines as they actively discriminate and marginalise the less affluent and the elderly within our town.

On the basis that we do not support the use of pay and display we will not be responding to question 6.a.

- 2.6b How could charging be fairly applied to car parks, on-street and seafront locations? Parking charges in the various locations cannot be applied equally, as the scenarios are very specific to the town, the location within each town and who the main user of the car park is.
- 2.6c Do you think that charging for parking should be fair and consistent across North Somerset? Yes. Charging for parking should not have a negative impact on any one area, or town, over another.
- 2.7 Are there particular hours of operation that would be challenging for your area? Yes. The introduction of parking charges would be challenging 24 hours a day, seven days a week in Nailsea.
- 3.1 Do you support the introduction of a short-stay parking permit? No.
- 3.2 How receptive do you think local residents would be to a short-stay permit? What benefits and challenges do you expect there will be with such a system?

 Nailsea Town Council believes that its residents would be opposed to such a scheme and the bureaucracy behinds its implementation. You have not provided any financial workings, for such a scheme.
- 3.3 What would you consider a fair price bracket for the permit? There is no fair price linked to a two-hour annual parking permit.
- 3.4 Can you suggest any alternative plans or strategies that could achieve similar outcomes in terms of managing parking effectively achieving the other goals set out in the strategy, while also considering the needs and preferences of residents, visitors and businesses alike? The Town of Nailsea should be left as is. There is no issue with parking and tampering with the current arrangements will negatively impact on residents, visitors and businesses alike.

The Town Council has gone back to its original response to the North Somerset Council 2020 Parking Review consultation and noted that not much has changed and that the issues captured four years ago still exists. We have included the relevant sections from our 2020 response as follows:

Back in 2020 Nailsea Town Council sought the views of businesses in the Town Centre, the users and volunteers of No. 65 High Street and market traders at the monthly farmer's market. Their overwhelming response was that the introduction of parking charges for both on-street and within the North Somerset Council owned town centre car parks was not welcome and would have a serious negative impact on the Town as a whole. The Town Council wishes North Somerset Council to preserve free short stay car parking in Nailsea.

Nailsea Town Council is vehemently opposed to the parking charges for the following reasons:

1. Management of demand

- 1.1 The primary reason given by NSC for introducing parking charges is "to improve the management of spaces and turnover to benefit users, businesses and service providers" and to recognise the need for change to sustainable travel choices. Parking charges in Nailsea will not increase the turnover of cars and may reduce the number of shoppers, who will seek alternatives at out of town shopping centres with free parking. It is our belief that many drivers will chose to park elsewhere in the town.
- 1.2 The long stay element to Clevedon Road and Station Road carpark has not been addressed.
- 1.2 The stated justifications for charges includes the mutually exclusive ideas that low tariffs (e.g. 50p per hour short stay and £3 per day long stay), will simultaneously not deter shoppers from driving, but in line with JTLP3, will help improve turnover and discourage users from all day parking by transferring to low carbon travel choices, which in order to be correct assumes drivers will be deterred by charges. A policy which deters drivers can only be to the determent of businesses, service providers and employers, as well as being an imposition on residents and visitors.
- 1.3 According to NSC "local businesses outside of Weston-super-Mare and residents have been calling for measures to improve the way parking is managed across NS to support local economies and town centres and improve amenity for residents"; the feedback the Town Council has received is quite contrary to this viewpoint.

2. Income and expenditure

- 2.1 NTC has not seen any evidence of a detailed and robust business plan for the true costs and potential income from car park charges in Nailsea. This is also the case for the 2024 consultation.
- Again we reiterate that Nailsea cannot be lumped in with Weston, Clevedon and Portishead with regard to the potential impacts of charges on Nailsea as a standalone location?
- a. The impact on roads around the town centre where people might choose to park if charges were in place. This especially relates to long-stay parking. The assumption has been made that "some additional restrictions may be required in some areas of the adjacent network to ensure displacement does not create traffic or safety issues". Addressing this issue during the detailed design stage will be too late.
- b. If more shops in Nailsea close, there will be reduced business rates income.

- c. If more people choose to walk or cycle to the Town Centre, or even avoid it, this would have an environmental and health benefit but would have a disproportionate impact on low income families and the Towns elderly residents.
- 2.3 The impact of free car parking at Tesco, Waitrose and Crown Glass Shopping Centre does not seem to have been taken into account in the plan for charges.

3. Economic impact

- 3.1 Apart from a few 'key attractor' stores such as Waitrose, Boots, WH Smith and the Farmers Market, the major attraction of the town is convenient and free parking. Nailsea has no 'passing' or tourist trade. The Town depends on regular local 'convenience' shoppers, and parking charges will have a disproportionate impact on their weekly spend. If convenience shoppers, especially those from outside the town, are deterred by charges and the perception of the town as a place to shop is further undermined, the fragile economy of the Town could be irreparably damaged.
- 3.2 Shoppers will be discouraged from visiting the Town, preferring to travel to out of town shopping centres such as Cribbs Causeway, with its thousands of free parking spaces.

4. Conclusion

- 4.1 Your Strategic Objectives state that you wish to establish a "fair and consistent" approach to parking across North Somerset, but it is clear that 'one size' does not fit all and is both unfair and inconsistent. Nailsea is not a tourist destination, nor is it on a main route to anywhere. Nailsea is a service centre for its own residents and a hub for the surrounding local villages; the layout of the Town Centre, the management of the car parks, the position of Tesco, Waitrose and the Crown Glass Shopping Centre and the absence of any tourist trade make it unique in relation to the other towns.
- 4.2 North Somerset Council has not included any of the villages within this strategy.
- 4.3 Nailsea depends upon regular small scale shopping trips. Free car parking is the single biggest attraction of the Town to shoppers and retailers. Attracting more people from outside the town is vital to economic growth. The local economy is fragile and shoppers' perception of the Town is weak. Charges will critically undermine the perception of Nailsea as a place to visit, take footfall away from the Town Centre and potentially create more empty premises.
- 4.4 Drivers are discouraged from on-street parking by the provision of the towns two free long stay car parks. Bringing in charges particularly for Clevedon Road, which is predominantly used by employees from local businesses, will cause residential roads to be inundated with commuters and will create an issue which currently does not exist.
- 4.5 Nailsea High Street and Town Centre (the area bounded by Stockway North, Stockway South and Brockway) is not just retail provision. It includes the library, two doctors' surgeries, solicitors, estate agencies, pharmacies, opticians, health ancillaries, pubs, takeaways, cafes and churches. Very few of these has parking for customers and only very limited parking for employees. Nationally the emphasis is on supporting high streets by cutting parking charges; the converse must not happen in Nailsea.

- 4.6 NSC's policy is to support the development of employment opportunities in towns like Nailsea. The imposition of parking charges would have the opposite effect, making it difficult for employers to recruit. Without investment into regular, reliable, affordable public transport, employees will have no choice but to drive.
- 4.7 The small number of on-street parking spaces on the High Street are of short duration and turn over very well, thus facilitating one-off shop visits. There is nothing to be gained operationally from introducing charges.

Nailsea must maintain free car parking for its residents, retailers, businesses and employees. This is essential to protect the vitality and economy of the Town. The absolute priority is to maintain free short-stay parking.

The Town Council is willing to enter into discussions with North Somerset Council about the future operation and management of the Town Centre car parks and would hope the appropriate financial arrangements could be made to this end.

Yours sincerely,

Mrs Jo Duffy Nailsea Town Clerk