

## **Review of Mendip Car Parking Strategy on behalf of Frome Town Council**

### **Introduction**

MDC have undertaken a review of their Car Parking Strategy. Although there is as yet no formal consultation this paper forms Frome Town Council's initial response to the proposals – this response is made without prejudice to any further comments FTC might wish to make at a later stage

Our first comment is that this is not a parking strategy it is a parking tariff strategy, and even within that limited context it considers only the tariff that should be charged within the existing structure, and not any changes to that structure.

### **Summary of proposals**

#### *Increased charge*

This summer MDC propose to increase car parking charges by the rate of inflation indicated in the CPI rounded up to the nearest 10p. For the Market Yard car park, this would mean:

1 hr	£1.10	up 10p
2 hrs	£1.50	up 10p
3 hrs	£2.00	up 20p
4 hrs	£3.60	up 20p
9 hrs	£5.90	up 30p

MDC propose to align Merchant's Barton Charges with the Market Yard, (Merchant's Barton is currently significantly cheaper). MDC have also identified Cork Street as a premium car park based on demand, and propose to increase charges here to reflect that. Due to lease arrangements that tie this car park to the Market Yard, this will increase short stay charges in the Market Yard, and as Merchants Barton will in future be tied to Market Yard, these too will be increased still further.

It is proposed to reduce the charges in Vicarage Street to bring parity with short stay charges at Cork Street.

The CPI increase (rounded up to the nearest 10p) is expected to become annual. It is not clear whether the increase will apply to the rounded price each year or whether increases will be in relation to a base year – if the former approach is used the rounding up will add to the increase over a period of years.

#### *Sundays*

Under the proposals car parking charges will be introduced in Frome for Sundays at the same rate as the rest of the week (and presumably also for Bank Holidays).

#### *Season Tickets*

MDC propose a 60% increase in season tickets to £708 per year for the Cattle Market and Merchants Barton and a 67% increase to £372 per year for North Parade, South Parade and Rook Lane and Wine Street.

### *Development on car parks*

MDC are still considering Boxworks in the Cattle Market and selling all or part of North Parade for residential development. These would result in reduced capacity at these car parks, in particular, the Boxworks proposal would both reduce capacity and increase demand for parking.

### **Off-street parking in context**

The report identifies a total of 10 car parks operated by Mendip, accommodating 688 spaces which are both Free and Pay and Display (three are allocated as Permit only). The Cattle Market has the most spaces at 360 and both Catherine Street and Rook Lane have the least at 5 and 8 respectively (Rook Lane is for Permit holders only).

There is a private car park at the Marks and Spencer store adjacent to the Merchants Barton car park. Charges are levied at the car park which is managed by a private operator on a pay and display basis.

For practical purposes the relevant car parks for the town centre are the Cattle Market, Cork Street, Merchants Barton, North Parade and Vicarage Street. Badcox Car Park serves a local centre, discrete from the town centre as a result of gradient as much as distance.

It is common practice to restrict on-street car parking near public car parks, so as to encourage use of the off-street parking facilities provided and prevent obstruction of streets that must also serve through traffic. However Frome is unusually constrained for on-street parking by both topography and the historic street layout which presented challenges over 200 years ago when Bath Street, the main road through the town, was built to relieve congestion. Many streets in and near the Town Centre (King Street, Stoney Street, Catherine Street, Catherine Hill, South Parade, Wine Street, High Street) struggle with traffic at all and can only accommodate very limited levels of parking by parking on the footway – parking in these streets is constrained by their width as much as by any traffic regulation order.

If on street parking is taken into account daytime demand for parking by workers, shoppers and visitors is much higher than that expressed in the report. There is anecdotal evidence of commuters parking much further out than might be seen in other towns with roads such as Weymouth Road congested with cars for the town centre. There have been issues with commuters parking at the hospital and health centre in order to avoid the cost of parking in the town.

It should also be noted that this parking provides a service for the town centre, for people who work there and for those shopping or using the banks and other facilities there. The market for car parking is somewhat inelastic but is not totally captive – drivers may choose to try and park elsewhere in town and walk to the centre or they may choose to work, or more particularly shop, elsewhere if charges are thought excessive for the service the town offers or there is insufficient capacity.

The guidance from ATCM/ACPA is that optimum usage is 90% of the number of spaces. Above that level the experience of users becomes negative, because they will spend time being frustrated at trying to find spaces, and there will be congestion and cars blocking the access ways. This is now frequently seen in Cork Street and on Saturdays and at Christmas in the Cattle Market.

Utilisation of car parks in Frome is detailed in the table below:

Car Park	Capacity	Max. Utilisation
Badcox	22	55%
Cattle Market	360	87%
Cork Street	70	100%
Vicarage Street	18	83%
South Parade	34	100%
North Parade	89	64%
Merchants Barton	71	100%
Marks & Spencer	122	97%
Frome MDC car parks	664	86%
Frome overall	786	87%

The overall figure masks the difference between the take up of central car parks and the outliers at Badcox and North Parade. The average for Cattle Market, Cork Street, Merchants Barton and Vicarage Street is 90%. Add the Marks and Spencer Car Park in and the average creeps up to 92%. In terms of best practice there is no spare capacity in the centre, as any increase in utilisation will increase delays and reduce the perceived level of service in central car parks

Taking each proposal in turn:

### **Increased charges**

There are two issues here – the increase in charges and the level that those charges are in the first place. Taking the increase first:

Mendip are justifying the increase on the basis of increased costs of car park provision, but offer no information to support the claim of increased costs. Whilst the car parks are scheduled for markings to be refreshed, and CCTV, lighting etc. required maintenance and upgrade, these items should have been included in any long term business plan for the car parks in the first place. These are not new issues.

This lack of transparency in costs and revenue means that we cannot make an objective assessment of the proposed increase. We cannot see if costs have gone up with good reason, or what elements of central office overheads are allocated to parking for example, or whether a surplus is generated by parking. The issue of surplus matters as other local authorities (locally North Dorset Council) have faced successful audit challenges over setting tariffs to create a surplus, and over how that surplus is spent. Without transparency it is impossible to judge whether a surplus is budgeted or how that surplus might be used. Certainly the strategy contains no mention of investment in parking capacity or measures, such as transport provision, to reduce demand for parking.

Whilst it is understandable that the tariffs for Market Yard and Merchant’s Barton should be harmonised, this hides the scale of increase in Merchants Barton. The 30p increase in the all-day tariff for Market Yard users represents approximately a 5% increase. However the hike from £3.60 to £5.90 for Merchant’s Barton represents a 64% increase across 16% of the long stay parking capacity in the town. Not only is this a significant increase for those users but assuming the current level of utilisation persists this will increase revenue from long stay central car parks by 11% not 5%.

The level of parking charges is justified by comparison to the charges in other neighbouring authorities. This is not a true comparison as in most places the relevant local council does not have a near monopoly on parking. People do not ask “Where is the best local authority car park”; they ask “where is the best car park for my needs”. When comparing towns it will be a comparison of all car parks, not just local authority ones, that counts.

The main competitors for shoppers from Frome are Trowbridge or Radstock/Midsomer Norton, which are not included in the list. Both have substantial free parking. In Radstock/Midsomer Norton all local authority (B&NES) car parks (c.267 spaces) are free. Parking at Radco is free for 3 hours

Our nearest commercial and retail competitor is Trowbridge, 8 miles away, where many Frome residents work. St Stephen’s Place car park offers 466 completely free unlimited car parking spaces in the town centre (i.e., 60% of the total charged for space in Frome town centre). It also has a car park in the Shires with a capacity of >1,000 cars where charges are:

Up to 1 hour 40p	(proposed rate for Frome £1.10)
Up to 2 hours 60p	(proposed rate for Frome £1.50)
Up to 3 hours 90p	(proposed rate for Frome £2.00 where allowed)

It is apparent from the above that our nearest competitors have significantly cheaper parking than Frome. Whilst Wiltshire are also reviewing their car parking rates Frome’s are more than double the existing rates, and in Trowbridge there is significant private provision for which charging is not linked to the council’s tariff structure.

### **Sunday charging**

The report proposes extending parking charges in Frome and Shepton Mallet to Sundays. There seems to be little justification other than that Sunday charging is already in force in Wells, Street and Glastonbury. In the absence of any other information it is assumed that charging would be at the same level as the other six days of the week.

Frome’s Sunday economy bears no comparison to that of Wells or Street. Wells parking economy, and indeed the town centre economy, is heavily based on the visitor and tourism economy generated around the Cathedral and Bishops Palace. Demand for these is less sensitive to weekend patterns than ordinary commercial activity, and indeed is enhanced at weekends including Sundays as that is when people have most leisure time. Street is a major shopping destination for comparison goods and has strong demand on Sundays. By contrast, whilst Frome is a very pleasant town it has little by way of a visitor economy and on a Sunday only the chain retailers and one or two cafes are open. Whilst this may be reflected to Mendip in reduced revenue through lower demand, for the user that impact is that there is a much lower town centre offer available than on other days, and yet the charge for parking is the same.

It is notable that the biggest draw in Frome on a typical Sunday is probably Marks and Spencer, who charge for their car park 24/7. However this car park is virtually empty on a Sunday. It should be noted that, of the outlets that open on a Sunday, all are replicated (in character if not by brand) at the edge of town or in other nearby centres where parking is free, and demand for them is likely to migrate with free parking. The exceptions are the few café’s that open, such as La Strada, who are likely to find their market much diminished.

There is a major worship venue in the centre at St Johns, which has its own parking in the church forecourt for 14 vehicles. However this is inadequate for the main morning service at 9:30am, when congregants use the Vicarage Street and Merchant's Barton car parks. In addition, when Bath Street is completely closed (for example during the Frome Half Marathon) then access to St John's own car parking is denied and all worshippers must make other arrangements. St John's also hosts the British Legion Remembrance Service in the town. Whilst this is an evening service the commencement overlaps with any 9am-6pm parking charge regime and would result in significant impact on veterans and others attending.

Sunday charging will also affect groups that specifically take advantage of the lack of activity in the Town Centre on a Sunday, such as the Canoe Club which is based in the Cheese and Grain Car Park.

As part of preparing this paper the views of the Cheese and Grain and of the operators of the Frome Independent Market were sought: the Cheese and Grain is located in the Market Yard Car Park, the largest car park in Frome whilst the Independent Market operates on ten Sundays a year, effectively taking over the Market Yard Car Park for the day and creating huge demand for parking everywhere else. A summary of the impact on these is given below

The Cheese and Grain hold events on many but by no means all Sundays; these vary from day time events such as the Chocolate Festival and South Africa Day to evening events such as the Frome Symphony. They make the point that no one chooses Frome on a Sunday for its public transport, there is virtually none, and these events are heavily dependent on parking. These events provide revenue for other businesses in town and also for the Cheese and Grain which opens its café and bar on all Sundays. Charging will put visitors off, which in turn will result in some organisers moving their events elsewhere, which will result in loss of trade for the Cheese and Grain and for other businesses in town. The end point of this would be the Cheese and Grain not opening on Sundays and there thus being very little demand for parking in Market Yard, which would mean that there would be almost no revenue to be collected by Mendip anyway.

The Frome Independent Market rent part of the car park to run the market, with traders vehicles parking in the remainder – the pitch charges for the Independent are already higher than elsewhere (even many London Markets) in order for the event to be viable. If traders then have to add the cost of parking their vehicles for the day (£5.90 per vehicle) this adds significantly to traders' costs and, more importantly, creates a perception of expense compared to other markets where traders' parking is free. The Independent Market have also worked hard to manage the demand for parking across town and minimise impact on residents, charging for the most central spaces, and (presumably) having a two hour restriction on those car parks where such restrictions apply in the week, will result in even more pressure in the surrounding area.

### **Season Tickets**

Whilst there is a reasoned justification for the hike in season ticket prices, even staged over four years this level of increase is off-putting. It also seems counter-intuitive to increase the cost of season tickets for North Parade by an even greater percentage than for the central area, when this car park has spare capacity.

A more normal mechanism is to increase certain charges by, say 3% above inflation, until realignment is achieved. The report also states that revenue will increase if those purchasing season tickets cease to do so because they will then pay every day that they park. This is unlikely, in practice people will park on surrounding streets, find ways to avoid coming into town at all, or negotiate for the use of

private parking spaces near the town centre. (A number of central residential developments have allocated parking which is not used by the residents themselves).

Also, as the season tickets are a ratio of the day ticket parking price, our previous comments about price comparison apply – if day ticket parking was cheaper, season tickets would also be cheaper, and logically the desired ratio of 50% of the cost of day tickets could be achieved by reducing day ticket costs.

The comparators for season tickets are unrealistic. Bristol and Bath are major cities with substantial alternative methods of transport and for which a premium can be charged, and where earnings are higher. To a lesser extent the same applies to Taunton, Yeovil and Salisbury. When those are stripped out the proposed discount is lower and the charges higher than the comparables offered in other towns. Add to this that in Midsomer Norton there are no season tickets because there is no charge for parking, and the overall picture is that Frome will become rather expensive for parking given its size and economic profile.

### **Development on car parks**

The strategy identifies the options of development on part of the Market Yard Car Park and part or all of the North Parade Car Park, although the number of spaces removed for partial options is not identified and so it cannot be determined whether this would take either car park over-capacity on current demand levels. It must be assumed that revenue for development would outstrip lost revenue from parking, otherwise the development would be unlikely to come forward, but no use for the revenue is identified. Certainly there is no suggestion that the revenue might be used to increase parking capacity.

The strategy also completely avoids mention of the loss of Merchant's Barton car park when Saxonvale is redeveloped. This would mean that Saxonvale has to provide for its own needs and for the replacement of Merchant's Barton before it makes a net contribution to parking capacity in the town.

We have already commented on the utilisation of car parks in Frome, and that the central car parks are virtually at capacity. It seems very short sighted to remove capacity from a central car park and from the one car park that can act as an overflow without seeking replacement capacity within the centre.

### **Capacity and Signage**

The report makes reference to capacity, and particularly the utilisation of Cork Street as a short stay car park making this a premium location. The proffered solution is to increase charges at Cork Street to reflect this premium location, but the report then comments that charges in Cork Street are, under the terms of a lease, tied to charges at Market Yard, and thus charges for up to 2 hours at Market Yard must match those at Cork Street. Elsewhere charges at Merchant's Barton and Vicarage Street are to be maintained in parity with each other and with Market Yard.

This completely removes the point of premium pricing, which is to offer a price advantage to non-premium locations. The benefit of increasing charges at Cork Street would be to encourage enough drivers to go elsewhere such that Cork Street's utilisation dropped to around 90%, however if the charges at the obvious alternative locations also increase, then this won't happen, the increase becomes self-defeating.

Further, the main reason that Cork Street is so well used isn't just its location, but the signage to it. It is the only car park in Frome that is adequately and properly signposted and thus all visitors can find it easily. In 2015 the Town Council and the Chamber of Trade walked the centre with Mendip DC and agreed revised signage which would address the issue. Three years later this has not been implemented.

### **Perception of Town Centre Parking**

Anecdotally there is evidence of dissatisfaction with parking in Frome, and regular users of the main car parks are noticing that it is taking longer to find a space even in the Market Yard, which has historically always had spare capacity. The 2017 Town Centre Benchmarking Report prepared by People & Places quantifies this dissatisfaction, indicating that 72% of businesses regarded parking as a negative issue compared with 51% nationally. While in 2016, 74% of town centre users considered parking in Frome to be a positive factor, in 2017 it fell to 19%.

The strategy appears to be about increasing revenue from parking and from development on car parks. There is little of substance other than this. The strategy does not address the service provided to the town centre by the provision of car parking.

### **Summary of FTC response**

- The parking strategy is actually a parking tariff strategy. The increases proposed are stated to be in line with CPI, but in practice for Merchant's Barton, Frome they are an increase of up to 64%.
- The increases are claimed to be justified by increased operating costs but no figures are quoted for these costs nor are examples of increased costs given. The costs quoted, such as re-lining the car parks, are ongoing maintenance that should already be accounted for. Any surplus revenue should be invested in parking and transport measures. There is no strategy for such investment.
- Comparisons that Mendip has made with other authorities are unrealistic as these authorities do not have a monopoly on local parking and the locations chosen are not realistic alternatives to Frome Town Centre.
- The proposed imposition of Sunday charges has not been adequately justified and will damage what little trade does occur on a non-market Sunday as well as the non-commercial uses that take place e.g. worship. Should the introduction of Sunday charging result in The Frome Independent having to pay for car parking spaces, this will threaten the market's viability.
- The Cheese & Grain estimate the potential loss of their turnover would be in the region of £70K to £80K pa if Sunday hires are cancelled and their own Sunday events have to be cancelled. One of the bigger annual events (South African Day) that brings 3,000 people into the town is already looking for a venue somewhere else as a result of the proposed Sunday charging. If the C&G stopped running big events on Sundays other businesses that will lose money include hotels, B&B's, taxi firms, food and drink suppliers & printers. Lost wages would mean less money spent in the local economy.

- The season ticket increases are steep even if justified, and if implemented should be phased in over several years. The comparators used are unrealistic and when more realistic ones are used the increases appear excessive.
- The references to development on car parks when Frome is virtually at capacity is non-sensical so long as there is no means identified of providing additional capacity. The draft strategy does not address this issue in any detail.
- The draft strategy appears to be about increasing revenue from parking and from development on car parks. There is little of substance other than this. The draft strategy does not address the service provided to the town centre by the provision of car parking. This should be seen in the context of recent surveys undertaken with town centre users and businesses. The 2017 Town Centre Benchmarking Report prepared by People & Places indicated that 72% of businesses regarded parking as a negative issue compared with 51% nationally. While in 2016, 74% of town centre users considered parking in Frome to be a positive factor, in 2017 it fell to 19%.
- In short, what is needed is a new strategy for on and off-street parking that looks at realistic pricing and investment in extra capacity and other modes of transport that will support the sustainable development of the town.
- In response to the above summary and the attached report, we would ask that the proposals outlined in the Mendip District Council Car Park Strategy 2018 – 2022 are reconsidered and that a new consultation exercise is carried out.

Frome Town Council should request a dialogue with Mendip about the particular needs of the town. In its Economic Development Strategy, the District Council has suggested the establishment of town fora to explore how town economies can be developed – this would be a suitable mechanism for addressing the issues around car parking.