



HOYLAKE VISION

Making things happen in Hoylake

Letter of Objection Scheme SA/PS/2017 Parking Charges

Dear Sir

LETTER OF OBJECTION

This letter of objection is submitted by Hoylake Community Planning Forum, which is the statutory neighbourhood planning forum for the designated Hoylake Neighbourhood Area.

Our objections are specifically related to the following areas.

- 1. Non-compliance with the Hoylake Neighbourhood Development Plan (NDP)**
- 2. Lack of Impact Assessment and Key Stakeholder Engagement**
- 3. Research and guidance from Government and other bodies**
- 4. Core Strategy Local Plan: reclassification of Hoylake**
- 5. Local evidence base**
- 6. Conclusion**



1: Non-compliance with the NDP

A *Neighbourhood Development Plan for Hoylake 2015-2020* (NDP) was “made” in December 2016, thereby becoming a part of the Council’s Plan.

The application noted above falls within the Hoylake Neighbourhood Area and is therefore subject to NDP objectives, priorities and policies.

Of particular relevance are:

- NDP Theme 1: Improving the Town Centre.
- NDP Vision Statement Objective 2: To strengthen the rôle of the town centre as a place for shopping, services and community facilities. To assist in increasing footfall in order to retain existing businesses and jobs as well as attract new businesses and grow the number of local jobs.
- NDP Vision Statement Objective 8: To maintain a safe and attractive pedestrian and cycling environment within the town centre, and to support public transport and traffic management initiatives.
- NDP Policies and Priorities: 5.3 Improving the Town Centre
- Policy TR1: Market Street (Providing well-designed on-street parking that supports local businesses)

Proposals which cannot clearly demonstrate a positive impact or show an adverse impact will not be supported by the NDP.

Since Hoylake Vision have not been presented with evidence to suggest that NDP objectives, priorities or policies are supported by the proposals, then the NDP cannot be cited by WMBC in support of the proposals.

On the other hand, the proposals do undermine the objectives of the NDP Vision Statement Objectives 2 and 8.

2: Lack of Impact Assessment and Key Stakeholder engagement

Of significant concern is that the scheme is being considered for implementation without any Impact Assessment.

Every town centre is unique, with different strengths and weaknesses including spatial considerations.¹ An Impact Assessment would necessarily require consideration of these at a local level.

In the absence of a dedicated, Hoylake-based local Impact Assessment we are presented with a Borough-wide, 'one size fits all' proposal.

Of particular local concern is the potential for an increase in the numbers of shoppers driving to shop in West Kirby, where there is free parking in supermarket car parks.

Most notably this would affect lower value top-up convenience shopping where a parking charge would become a material consideration for price-conscious shoppers.

We are also concerned about:

- The apparent lack of any consideration of improvements to public transport provision to mitigate any impact on private car use.
- The apparent lack of any consideration of the impact on residential parking in local roads adjacent to the High Street, with its implications for traffic congestion and pedestrian safety.
- The apparent lack of Key Stakeholder engagement.
- The apparent lack of consideration of non-retail uses of the town centre, including ground and upper floor offices.²
- The significant likelihood that the cumulative adverse economic impact will be greater than the anticipated revenues.

There are other outstanding questions:

- Which 100 of Hoylake's 230 spaces are to be subject to the scheme and what is the rationale for that selection?
- Which company will operate the scheme?
- What arrangements are there for collection of penalties?
- What will the parking charges be?

¹ <http://www.hoylakevision.org.uk/wp-content/uploads/2013/01/Hoylake-shops-2011.pdf>

² <http://www.hoylakevision.org.uk/wp-content/uploads/2013/01/Upper-floor-uses.pdf>

3: Research and guidance from Government and other bodies

The issues that impact on the health of a town centre are various, multi-faceted, overlapping and ultimately complex.

There is a range of contradictory anecdotal evidence surrounding parking in town centres, however the broader argument generally falls into two categories:

1. That greater accessibility for cars on the high street increases the viability of town centres by improving trading for business.
2. That restricting accessibility for cars will increase the viability of town centres by cutting congestion and pollution whilst making the high street more pedestrian friendly and increasing dwell time.

In reality, there is some truth behind both, but this depends on local circumstances. We argue that, whilst the NDP supports reducing congestion and environmental improvements for pedestrians, the former argument in favour of retaining accessibility for cars applies in the case of Hoylake at this current time and taking into account current trading conditions.

The onus on planning officers and Councils to research and carefully consider the unique challenges and needs of individual town centres is made clear in government guidance.

In their document “Ensuring the vitality of town centres”, the Department for Communities and Local Government (DCLG) state: *“Any strategy should be based on **evidence of the current state of town centres** and opportunities to meet development needs and support their viability and vitality...”*³

Further, DCLG advise in their 2004 document “Right to Challenge parking policies”: *“Inappropriate parking rules, over-zealous enforcement and high parking charges drive people out of town centres, push up the cost of living, harm local shops and make it harder for people to park responsibly and go about their everyday lives.”*⁴

The National Planning Policy Framework (NPPF) states: *Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.*⁵

ATCMs 2013 document “Re-think: Parking on the High Street”, highlights the unintended consequences of a non-strategic approach to car use in small town

³ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

⁴ <https://www.gov.uk/government/publications/right-to-challenge-parking-policies>

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

centres: *“Some might question why it is so important to protect the our town centres if out-of-town shopping caters for the car borne consumer, the Internet for those that want to stay at home and the traditional centre for everyone else. The truth is, not thinking strategically about car parking can be an extra step towards the erosion of the town centre’s viability and lead to the under-utilisation of a centre’s assets... Not thinking strategically about the car’s role within a variety of transport modes with access to the town centre could entrench reliance on the car. For example, car users feeling unwelcome in the town centre and using alternative destinations with free parking will contribute to a displacement of spend. This ultimately weakens the offer of the town centre. With a weaker offer other consumers may be persuaded to travel by car to out-of-town locations. The town centre, with a variety of modes of accessibility and its location within a catchment area is pivotal in attempts to prevent unnecessary urban sprawl and to encourage greater use of public transport modes of transportation.”*⁶

A March 2015 study “Assessing the Impact of Car Parking Charges on Town Centre Footfall”, commissioned by the Welsh Government concluded: *“Out of town developments were unanimously cited as being at least partly responsible for having a detrimental impact on footfall and business trade in the town and city centres. The fact that most of these developments offer free parking was felt to give shoppers a reason to go to them over town or city centres.”*⁷ It cannot be ignored that West Kirby’s supermarkets offer free parking that would be a material consideration for Hoylelake residents wishing to undertake any low value top-up convenience shopping.

On a borough-wide scale, Wirral already ranks 144th out of 353 UK Councils for surplus revenue from car parking (£1.185 million in 2015-16; representing an increase of 36% since 2011). If the council aimed to further increase this surplus by £1million, its ranking would match that of the London Borough of Greenwich, some way above the Borough of Watford, a key London Commuter Borough.⁸

There is also a concern about the use of revenues from car parking where section 55 the Road Traffic Act 1984 prescribes how councils may and may not use surplus revenues. In their document “The control of parking by local authorities”, the RAC Foundation state: *“Any local authority that sets its parking charges or penalties in order to raise funds is acting ultra vires (i.e. illegally) and may be challenged in the Courts... Furthermore, a Local Authority may only spend the surplus on activities outside the list in paragraph 36 of the Annex if it has been prescribed by the Secretary of State (see paragraph 38 of the Annex). We have been unable to find any such prescriptions.”*⁹

⁶ http://www.britishparking.co.uk/write/Documents/Re-thinking_Car_Parking.pdf

⁷ <http://gov.wales/docs/caecd/research/2015/150610-assessing-impact-car-parking-charges-town-centre-footfall-en.pdf>

⁸ http://www.racfoundation.org/assets/rac_foundation/content/downloadables/Local_Authority_Parking_Operations_Revenue_Outturn_for_England_2015-16_listed_by_size_of_surplus_and_alphabetically.pdf

⁹ http://www.racfoundation.org/assets/rac_foundation/content/downloadables/elliott%20-%20parking%20enforcement%20-%20main%20report%20-%202016082010.pdf

4: Core Strategy Local Plan: reclassification of Hoylake

DCLG state *"Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre."*¹⁰

WMBC propose in the emerging CSLP a reclassification of Hoylake to a District centre, downgrading from "Town Centre" status.¹¹

The roots of this proposal lie in the 2009 *Strategy for Town Centres* report by Roger Tym & Partners which suggested that, at the time, there were signs of "ongoing decline".¹²

In that document, Hoylake is deemed in the Analysis of Vitality and Viability to be *"Showing significant signs of weakness; performing poorly in relation to key indicators"* It is notable that the same document does not mention the word "golf" once.

Hoylake Village Life, the Community Interest Company that formed the original Hoylake Neighbourhood Forum Vanguard under the terms of the Localism Bill of 2009, responded in detail to these proposals in 2010¹³: *"The long-term effect of this is likely to shrink the centre of Hoylake, reducing the number of shops and opportunities for town centre uses."*

The proposal to reclassify Hoylake remains an ongoing key point of concern for Hoylake Vision, especially since there is evidence, both recorded and anecdotal, of recovery since 2009 and this trajectory of recovery must be protected and supported.

We share WMBC's concern that the recovery is fragile and that the town centre is undoubtedly more vulnerable to subtle changes in the local economy than other adjacent town centres, however the NDP has been created to strengthen the underlying conditions that and aims to provide greater stability and confidence, protecting Hoylake's centre and leading to more positive future development.

Hoylake Vision therefore contend that, on the basis of more up to date evidence, Hoylake should no longer be determined to be "in ongoing decline", as identified by

¹⁰ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

¹¹ <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Consultation%20on%20Settlement%20Area%20Policies/DraftSettlementAreaPolicyforHoylakeWestKirby.pdf>

¹² <http://www.hoylakevision.org.uk/wp-content/uploads/2013/01/Volume-1-Main-Report.pdf>

¹³ <http://www.hoylakevision.org.uk/wp-content/uploads/2012/11/Core-Strategy-Response.pdf>

Roger Tym in 2009; rather to be “showing some signs of weakness, along with some signs of improvement”. As such Hoylake should not be subject to a strategy of managed decline, as recommended by implication by Roger Tym Associates.

We contend that if the parking scheme is implemented, this will have an adverse economic impact thereby undermining the NDP objectives whilst obliging WMBC to pursue a strategy of managed decline in line with DCLG’s recommendations.

5: Local evidence base

Evidence suggests that the negative impact on the local economy would be significant.

Using the same evidence base used for the Hoylake NDP, which sources data from Experian GOAD, NLP, Roger Tym, GVA and WMBC¹⁴, we can demonstrate this firstly through a basic analysis of available data on convenience and comparison shopping in Hoylake, in the context of the availability of free parking in nearby out of town supermarkets, notably West Kirby.

Convenience shopping (main)

According to the GVA Wirral Retail Study Update of March 2012, Hoylake and Meols residents spend £10 million per annum in Morrisons West Kirby (whilst it has a benchmark trading level of £20 million, its turnover actually exceeds £32 million) on main convenience shopping.¹⁵

This inevitably already has the effect of drawing significant footfall out of Hoylake, which clearly impacts businesses. However, although West Kirby supermarkets clearly dominate main weekly convenience shopping, combined convenience main shopping turnover (*excluding Sainsbury's Local*, which has free parking), is £1.7 million pa.

There is therefore a **moderate** concern about the potential negative impact on local main convenience shopping.

Convenience shopping (top-up)

This area of retail is particularly sensitive to car park charges since the average transactional value is much lower; the decision to pay for parking when spending a small amount is inevitably more acute.

Further, top-up convenience shopping turnover in Hoylake is higher than main convenience shopping turnover, so any relative impact is more significant.

Hoylake top-up convenience spend totals £3.6 million pa (representing a 27% share of all top-up spend in the Hoylake-West Kirby wards).

Excluding Sainsburys Local, which has limited free parking, top-up convenience spend at other Hoylake local shops totals £2.6 million pa, or a 20% share of total top-up spend in the Hoylake-West Kirby area.

There is therefore a **significant** concern about the potential negative impact on local top-up convenience spending.

¹⁴ <http://www.hoylakevision.org.uk/supporting-reference-documents/supporting-reference-documents-town-centre-daytime-economy/>

¹⁵ <http://www.hoylakevision.org.uk/wp-content/uploads/2013/01/WirralRetailStudyUpdateMainReportMarch2012.pdf-1.pdf>

Comparison Shopping

Comparison shopping turnover is £2.6 million, representing a 21% share of total comparison spend in the Hoylake-West Kirby area.

Given the trend towards online comparison shopping, and that retail based comparison shopping relies in large part on convenience shopping, there is therefore a **moderate** concern about the potential negative impact on local comparison shopping.

Audit of car parking spaces in Hoylake

Hoylake Vision have undertaken a basic audit of car parking spaces.

46 designated parking bays in Market Street, consisting of:

- 5 spaces outside The Row
- 9 spaces from the IPost Office to Island Electrical
- 12 spaces from Monte Carlo to Dominos
- 5 spaces outside the Town Hall
- 6 spaces opposite Potting Shed
- 7 spaces opposite Well Pharmacy
- 2 spaces opposite the Post Office

9 designated parking bays in Albert Road, consisting of:

- bay outside Nine Leaves long enough for 4 cars
- bay outside the Newsagents long enough for 5 cars

Charles St has **36** spaces

Carr Lane has **139** spaces

This makes a total of 230 parking bays. Which 100 of these are designated by WMBC for charging?

6: Conclusion

It is clear that, for price conscious shoppers, and not taking into account the turnover of Hoylake Sainsbury's Local (which has a limited number of free parking spaces) the implementation of car parking charges in Hoylake would be highly likely to lead to a significant loss to the local economy, most notably in terms of its impact on convenience top-up shopping.

Given the sensitivity of the local economy and the higher proportion of top-up convenience spend in Hoylake, it is clear that **even a ten per cent impact in this area alone would represent a loss of at least £260,000 per annum to the local economy**, which far outstrips the anticipated revenue for WMBC of £40,000 per annum whilst adversely impacting local businesses.

The potential for some businesses to fail as a result of this lower turnover would directly result in a reduction of business rates revenue for WMBC and a reversal of the reduction in vacancy rates enjoyed in recent years, as well as a range of other longer term negative impacts.

In addition we believe there would be further adverse impacts on main convenience and comparison shopping in Hoylake; as well as reducing the attractiveness of Hoylake as a place to do business for non-retail businesses including financial and legal services.

The impact on local residential streets would also be significant in some areas, for example at the end of Alderley Road by Sainsbury's Local as more cars attempt to park in the limited free parking spaces available there.

We can see no positive outcomes for Hoylake, or for the Borough as a whole, from these proposals.

NDP Policy TR1 states: "Inside the 'key shopping areas' defined on the Proposals Map, proposals that would assist in providing well-designed on-street parking that supports local businesses will be supported."

Since the proposal to impose parking charges in Hoylake does not demonstrate support for local businesses, and is more likely than not to have an adverse impact on the local economy, the proposal to introduce car parking charges in Hoylake cannot therefore accord with this policy.

Hoylake Vision Community Planning forum therefore object to the proposals and request that WMBC suspend the proposed implementation of parking charges in Hoylake.

**Hoylake Vision Community Planning Forum
30 January 2017**