



HOYLAKE VISION

Making things happen in Hoylake

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Commissioning Support
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June 2018

Hoylake Vision Community Planning Forum comments on proposal TO/18/07 Implementation of Parking Charges at North Parade and Meols Parade

Dear Mr Atkins

Hoylake Vision Community Planning Forum is the statutory neighbourhood planning forum for the designated Neighbourhood Development Plan (NDP) area.

This document sets out serious concerns about the proposals to implement parking charges within the NDP area. The forum would value a conversation with a representative of WMBC to explore these concerns in more depth.

Our observations are based on the objectives, priorities and policies in the NDP, as well as the National Planning Policy Framework (NPPF), with which the NDP is required to be in line.

(Since WMBC's Core Strategy Local Plan (CSLP) is yet to be completed – a matter of concern – we can only apply a few observations relating to emerging policies within that and the extant Unitary Development Plan (UDP), which are detailed later in this document.)



Our comments are specifically related to the following areas.

- 1. Measuring the proposals against the Hoylake Neighbourhood Development Plan (NDP)**
- 2. Concerns about lack of Impact Assessment and Key Stakeholder Engagement**
- 3. Research and guidance from Government and other bodies**
- 4. Conclusion**

1: Measuring the proposals against 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. ¹

The proposals fall within the Hoylake Neighbourhood Area and are therefore subject to being measured against NDP objectives, priorities and policies.

Of particular relevance are:

- **NDP Theme 2** which seeks to make better use of the promenade for public recreation, including more food and drink outlets
- **NDP Theme 3** which seeks to improve pedestrian and cycle connections between Market Street, the promenade and the railway stations and to manage the impacts of vehicular traffic, including on-street parking.
- **NDP Policy BR1: Seafront recreation** which seeks to enhance the public realm; improve existing community and/or visitor facilities; provide appropriate types of community and/or visitor facilities, and providing high quality and sensitively located food and drink outlets
- **NDP Objective 4:** To more fully realise the potential of the promenade as an accessible leisure and tourism destination with an appropriate range of facilities for residents and visitors.
- **NDP Objective 5:** To provide a range of good quality and socially inclusive public open spaces and outdoor leisure opportunities.
- **NDP Objective 9:** To improve pedestrian links between the town centre, the promenade and the railway stations to meet the needs and expectations of residents and visitors.

At present, the only part of the proposed area that includes some of the facilities mentioned above is Meols Parade Gardens. Some present users of this public facility will be adversely impacted by parking charges. Others, however, travel to the facilities by foot or by cycle (notably the tennis courts) and this is to be encouraged. However in the absence of any data on how this area is presently used it is difficult to know to what extent the proposals are viable or how they will impact.

The NDP also includes a number of non-land use priorities that cannot be delivered directly by planning policies. The relevant priorities are:

- Enhancing existing public space on the promenade for relaxation, socialising and active leisure, for all age groups.
- Developing visitor facilities to support use of the beach, i.e. a car park and public toilets.
- Creating better quality play areas with activities for children of all ages.
- Providing a properly constructed skate park in an appropriate location.
- The Council’s Beach Management Plan should be supported and followed, with a regular review of practices for monitoring development.
- Improved cycle infrastructure.

¹ <http://hoylakevision.org.uk/the-hoylake-plan/2015-2020/>

In this context and from our perspective, the proposals appear contrary to the spirit of the following UDP and emerging CSLP policies:

- Policy URN1: Development and Urban Regeneration
- Policy REC1: Principles for Sport and Recreation
- Policy TLR1: Principles for Tourism Development
- Policy TRT1: Provision for Public Transport
- Policy TRT2: Safeguarding Land for Highway Schemes
- Policy TRT3: Transport and the Environment
- Policy COA1: Principles for the Coastal Zone
- Policy CS31: Recreational Land and Buildings (CSLP)

The Community of Hoylake and the Community Planning Forum have clearly identified a set of objectives, priorities and policies with a view to developing the local economy and improving community engagement, including very specific ambitions for the area where the proposals are based.

We are deeply concerned that WMBC's proposals will make the above NDP and UDP/CSLP policies much more difficult to deliver in future in the absence of any meaningful dialogue between the Community Planning forum and WMBC, through which a set of mitigating proposals might be explored.

2: Concerns about lack of Impact Assessment and Key Stakeholder engagement

As with our previous objection to the proposals for introducing parking charges in the town centre (January 2017), a significant concern is that the scheme is being considered for implementation without any Impact Assessment.

Every town is unique, with different strengths and weaknesses including spatial considerations. 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.

We are deeply 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 Key Stakeholder engagement.**
- **The significant likelihood that the cumulative adverse economic impact will be greater than the anticipated revenues.**

There are other outstanding questions:

- **Which company will operate the scheme?**
- **What arrangements are there for collection of penalties?**

3: Research and guidance from Government and other bodies

First and foremost, any assessment of the proposals demands reference to the National Planning Policy Framework (NPPF). At the heart of the NPPF is “a *presumption in favour of sustainable development*”... a “*golden thread running through both plan-making and decision-taking.*” The relevant section of the NPPF is **Section 4: Promoting sustainable transport** which states that Local Authorities should “*protect and exploit opportunities for the use of sustainable transport.*”

According to the NPPF, transport policies should:

- contribute to wider sustainability and health objectives (para 29)
- give people a real choice about how they travel (para 29)
- facilitate the use of sustainable modes of transport (para 30)
- give priority to pedestrian and cycle movements (para 35)
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians (para 35)
- incorporate facilities for charging plug-in and other ultra-low emission vehicles (para 35)
- consider the needs of people with disabilities by all modes of transport (para 35)
- set appropriate parking charges that do not undermine the vitality of town centres (para 40)
- parking enforcement should be proportionate (para 40)
- identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice (para 41)

The NPPF also states: “*A key tool to facilitate this will be a Travel Plan.*” To this end, we are concerned at the absence of such a plan in support of WMBCs proposals to provide “*a fair and sustainable parking policy within the area*” and indeed to address the underlying issues of sustainable transport provision in the borough, for example increased support for electric vehicles and shared vehicle use.

The extant *Transport Plan for Growth* developed between WMBC and Merseytravel does not adequately cover the issues being raised here.

There is a further 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.*”²

² http://www.racfoundation.org/assets/rac_foundation/content/downloadables/elliott%20-%20parking%20enforcement%20-%20main%20report%20-%2016082010.pdf

4: Conclusion

Our comments necessarily revisit evidence in support of an earlier **objection** submitted in 2017 in relation to proposed parking charges in Hoylake town centre³.

However the core rationale in that case was to protect the economic viability of the town centre. We recognise that the implementation of car parking charges on North Parade would not have the same level of impact on the town centre economy as the earlier proposals.

Nevertheless it is clear that the consequential reduction in visitor numbers to Hoylake would have a detrimental effect on the existing local economy and particularly on future economic development.

The absence of any proposed mitigating activities to support the visitor economy and improve sustainability is notable. These might include proposals such as:

- improved access for cyclists including secure cycle bays
- charging points for electric cars
- a modest and suitably positioned food and drink facility
- WCs
- local information boards
- new signage to the town centre
- improved public realm in the area.

The **statement of reasons/effect** published by WMBC in relation to these proposals states: *“The reason for this traffic regulation order is to introduce waiting restrictions to maintain access along the promenade and improve visibility and manoeuvring space at junctions and slipway areas, and introduce paid parking to allow the Council to provide a fair and sustainable parking policy within the area.”*

We do not consider the first part of this rationale to be justified in the context. The implication that access, visibility and manoeuvring in the defined area is problematic is an entirely anecdotal one, with no evidence presented in support. Hoylake Vision understands and support the ambition to provide a fair and sustainable parking policy. However there is little evidence in support of this.

We previously highlighted that 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 revenue by its proposed £250,000, its ranking would exceed that of the Borough of Watford⁴, a key London commuter Borough with a population four times greater than Wirral.⁵

³ <http://hoylakevision.org.uk/letter-of-objection-to-parking-charges-in-hoylake-scheme-number-saps2017/>

⁴ 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

⁵ [https://watford.jdi-consult.net/documents/pdfs5/Retail%20Study%20Update%202013%20\(GVA\).pdf](https://watford.jdi-consult.net/documents/pdfs5/Retail%20Study%20Update%202013%20(GVA).pdf)

Further, in the absence of a Travel plan, which would necessarily be supported by qualitative and quantitative data on private and public transport as well as pedestrian use of the area being considered, we have serious concerns that the proposals cannot be demonstrated to be 'fair' or 'sustainable'.

As a consequence, and in the absence of any business model to support the proposals, the costs of implementation will be significantly higher than the potential revenues, especially taking into account the diversionary impact of the proposals (where side streets will be used for visitor parking instead).

Hoylake Vision Community Planning Forum

12 June 2018