Dear Executive Councillors,

The councillors from Clevedon, Nailsea, Portishead and the North of this district are broadly against the Parking Management Strategy as laid before the Executive on the 16th of October 2024. As a principle we are against parking charges, viewing them as a barrier to businesses and a detriment to our towns. We wish to outline our opposition to this strategy and urge you to amend the policy proposals, which are currently lacking meaningful detail. The only thing which is clear about this policy is that it presents cost, without benefit. Therefore, a new deal is needed for our towns to thrive, and it must be made abundantly clear what the tangible benefits received from this policy are. The most troubling aspect of the decision-making is that this policy only has financial justifications making it a cash cow. This policy should be an instrument to manage highways and support our high streets, which happens to provide revenue as a bonus.

On the 11th of November PEP Panel’s Call-in passed with the following resolution:

**Resolved:** That the majority of this panel support the introduction of parking charges. However, the panel is concerned about the impact of the proposals on local businesses, community clubs, community groups and residents. The panel asks that the Executive develops mitigations that can be introduced to address these impacts, the cost of such measures to be included in the budget setting process. This is to ensure better policy and a better deal for our towns.

Considering the Panel’s view that charges are supported, there is an acute need for mitigations to protect our towns and businesses. Therefore, we shall set out some considerations which may be used as amendments to the existing policy. A broad concern of ours is that there is no exit strategy if the 6–12 month trail fails. Under that circumstance, would all sites be assessed individually on their own merits to determine which sites are viable?

In line with North Somerset Council’s corporate aim to be “open” the Executive has made a commitment that “the scheme will be reviewed after 6 to 12 months of being in operation” (16/10/24). We believe that to be open and accountable the Executive should commit to annual reporting of all revenues and their uses. This would be supported by the creation of key performance indicators (KPIs), to monitor the value and efficacy of the policy. Additionally, the Executive should request that the PEP Panel confirms the KPIs which are monitored and that the annual report is presented to PEP, allowing scrutiny to hold the policy accountable on its merits and outcomes in an “open” way. It is our belief, that with a visible and obvious method of revenue generation that the benefits and uses should be tangible and publicly available to ensure fairness between council and resident. Especially, with such a significant opposition as evidenced by the consultation.

We would like the Executive to commit to:

* Creating KPIs to monitor value and efficacy.
* Annual reporting of all revenue raised and its uses to PEP.

When it comes to the usage of money, the consultation frequently framed the revenues as “surplus” and “reinvestment”. The draft strategy goes further by stating that revenues raised are “new income”. There is a risk of misleading the public because this money hasn’t been indicated as a net gain to Highways. The Council’s wider rhetoric of financial struggles indicates that this money will be raised and used to replace the general fund being withdrawn from Highways. Therefore, residents are paying twice for the privilege of the same old, poor road maintenance. The consultation asked how the revenues should be spent, the overwhelming result, of respondent’s first and second choices was on potholes and road repairs (2872) then public transport (1324). With maintenance of car parks (849) and improving access for disabled people (817) as key themes. However, only civil enforcement and on-street parking is legally ringfenced for the maintenance of car parks and then broadly within Highways. The absence of a five-year investment strategy doesn’t signal that the council will spend the money on these priorities or even has a clear goal of what it wishes to achieve. Potholes and road maintenance should be prioritised, and public transport interventions should support community transport; not acting as a backup for BSIP.

We would like the Executive to commit to the following:

* Income from civil enforcement and on-street parking is only used in or near the three towns, on potholes/road repairs and community travel grants (public transport for the vulnerable) after the maintenance of car parks.
* Creation of a funding formula which ensures a portion of the revenue raised is net to Highways and is a genuine “surplus” and “reinvestment”.
* An investment strategy, providing an ambition with reasonable accuracy, for the use of revenues over the five-year term of the Parking Management Strategy.

With the adoption of these three amendments, this will ensure transparency and value to residents across the district and a better return on investment to our three towns.

The Action Plan states that charges will be reviewed annually and amended with inflation, in the report there is also, the suggestion that the strategy may be expanded to include additional sites. To ensure good communications it would be a sensible step to establish a ‘business forum’ as a mailing list to ensure that businesses (and business organisations) in the relevant areas , can be fully informed of changes to charges. By enabling businesses to plan appropriately and, to act as an informal consultation prior, to any decisions would prevent shocks to our towns. Plus, this would work to bring the council closer to the business community and ensure that charges are business-led and have minimal impact on our high streets.

We would like the Executive to commit to:

* Providing businesses a voice, through an engagement mechanism and that charges are reviewed according to the needs of our high streets/town centres whilst noting inflation.

The “interventions” are at complete odds with the Action Plan making this policy garbled and unclear. The interventions mention a usage of technology to assist parking pressures. This isn’t carried forward to the Action Plan, without an investment plan which outlines the revenues raised, priorities, and expected uses this appears to have fallen through the cracks. At large parking sites digital signage indicating available parking spaces would enable parking to become quicker and simpler. Additionally, the Parking Management Strategy doesn’t mention permitted development. Awareness of this via communications or a page or two of planning advice, may lead to households choosing to add or extend driveways and increasing parking provision. Clevedon BID has argued in Clevedon that two-hundred new spaces could be made by easing restrictions, this isn’t detailed inside the Action Plan or more broadly across any of our towns. EV charging is mentioned under interventions, as a part of BSIP’s transport hubs and irrelevant to this policy. EV charging is mentioned once more, regarding payment method alignment. Why isn’t the council, adding EV charging points in our car parks whilst it is investing in infrastructure for charging? This omission is contrary to objective one of the EV Strategy and doesn’t feature in the Action Plan. Additionally, the provision of EV charging at Council owned car parks could be a useful revenue stream. It’s unclear if the council has identified new sites to increase parking provision across the three towns, the creation of new spaces and sites could ease pressures.

We would like the Executive to commit to:

* Amending the Action Plan to include wider workstreams such as guidance for permitted development, EV strategy, technology, restriction reviews (with the aim to increase parking provision) and a review of potential parking sites.
* Any revenues raised from EV Charging, after covering costs to be spent on road repairs and/or community transport.

Clevedon has a specific implementation issue arising from the remedial works on the Seafront, These are expected to occur during February-May. This overlaps with when the charges will be implemented at Hill Road, Alexandra Road and Bellevue Road (HAB) and the on-street parking around the Salthouse (Old Church Road and Elton Rd) occurring May-July.

 Is it wise to have all this disruption to one of Clevedon’s main commercial areas, especially, if the Seafront works experience delays?

We ask that the timescales are amended to ensure businesses aren’t hit harder than necessary.

The BSIP Refresh committed to an ambition that Nailsea, Clevedon and Portishead had a circular bus route around each town. A stated aim of the Parking Management Strategy is to “reduce car commuting and car use” this runs counter, to the Core Strategy which concludes the naivety that reducing parking capacity, doesn’t reduce usage. Additionally, in the report to the Executive (16/10/24) its noted that “private car ownership remains essential for many everyday journeys. Without an adequate public transport option inside of our towns, this strategy makes a hostile environment for the car and doesn’t offer a solution, other than having to pay for the privilege. Should the town routes, be prioritised under BSIP and introduced at the same time as charges?

We would like the Executive to commit to:

* Revising the implementation timescales in Clevedon to prevent unnecessary doubled up disruption.
* Prioritising BSIP ‘Town Routes’ to offer a viable alternative to the car for short journeys inside our towns at the same time as discouraging car use.

There are a few specific areas where the harm caused by this strategy is pronounced across our three towns and we urge the executive to consider mitigations regarding these specific issues. The decision to include HAB as the only on-street parking (outside of seafronts) is based on absolutely nothing whatsoever and falls foul of the strategy’s own aims. The inclusion of these on-street charges is allegedly, justified by “the strategy to encourage drivers to park in car parks over on-street parking”. This strategy isn’t referenced in the strategic objectives or aims of the Parking Management Strategy, meaning that it isn’t a strategy inside this policy. It cannot be argued as “fair” for HAB being the only on-street site across the three towns, nor is it fair, that there is no off-street parking obvious to HAB businesses and residents. The closest sites would be the Great Western Road car parks which are one mile away. The equalities impacts are obvious and reduce accessibility to HAB’s businesses. There are more residences than businesses on Hill Rd therefore, residential parking (longer duration) needs to be accommodated for the effective management of the highway network. During the PEP call in meeting, it was made clear that the strategy would make a return with a 75% reduction in modelling therefore, it shouldn’t be an issue to withdraw HAB completely from the strategy maintaining the existing restrictions, which was the approach supported by scrutiny and ignored by the Executive. Failing that, HAB should be awarded 2 hours free and charges to be implemented for the excess duration of the stay. HAB’s inclusion isn’t “fair” or backed up by the existing policy or scrutiny process.

Portishead Lake Grounds has been a focal point of opposition in Portishead due to the presence of charities, sports clubs, and businesses. Therefore, prior to any implementation at this site it is essential that a permit system is in place which doesn’t penalise the many volunteers or clubs which require access to this site. Given the sensitivity of this site the Executive should create a working group comprised of the relevant members similar to the groups used over Clevedon Seafront and Yatton High Street.

Nailsea has an issue with the private provision of free parking which will undermine any introduction of charges and has recently had its community transport grant cut by this council. It is imperative that over all sites, close to private free parking that a free period of an hour is granted to maintain the competitiveness of North Somerset’s parking facilities. Additionally, Nailsea should have its community transport grant reinstated from revenues raised, under public transport improvements because this often supports vulnerable people.

We would like the Executive to commit to:

* Withdrawing HAB from the Parking Management Strategy due to its inclusion breaching corporate values, having no policy justification, or support from scrutiny.
* Form a working group with Portishead members and prioritise permits for the Lake Grounds charities and clubs to ensure that a localised solution is reached.
* Reinstate Nailsea’s community transport grant.
* Consider 1-hour free parking in all car parks near to privately owned free parking.

Overall, the Parking Management Strategy is fundamentally flawed, and neither its content or implementation has been thought through in a logical and sensible manner which is pertinent to the management of highways or support for town centres. The Action Plan doesn’t reflect the strategy and only serves to make money not manage parking pressures, with the bonus of revenue generation. If the Executive feels able to adopt, in full, or, the greater part of these amendments it would demonstrate a clear cost, with clear benefits and a shift away from revenue and towards supporting the district. It’s true, some of us will never support charges however, with sensible mitigations and a wider body of work, there will be a fair balance of financial need and merit to the proposed policy.

Best wishes,

Councillor Ashton *Gordano Valley*

Councillor Blades *Clevedon Yeo*

Councillor Burden *Portishead South*

Councillor Ellis *Nailsea West End*

Councillor Pryke *Clevedon Walton*

Councillor Smith *Clevedon West*