

Important Note:

This letter was sent by the individual Parish Councillors named at the end of this letter and Jeremy Bradburne (acting on behalf of the Community Council) to the members of Babergh Council Cabinet in the context that in meetings with Babergh Council Representatives they had made it totally clear that NO Change was NOT an option.

Letter Begins:

Dear Councillors

Re: PROPOSED CAR PARK CHARGES IN LAVENHAM

This Councillor letter follows a response to the consultation ended 3rd March 2024, submitted by our Clerk on behalf of Councillors and residents.

We are grateful to Mark Emms, Director of Operations, and Matt Smith, Parking Services Manager, for the time they have made available to discuss the proposals with Lavenham representatives. Since the closure of consultation, our Clerk has opened an email dialogue with Mr Emms, who has commented that he appreciates the approach Lavenham Parish Council (LPC) has adopted in recognising the financial pressures faced by Babergh District Council (BDC).

The proceedings of the Overview & Scrutiny Committee (O&SC) held on 18th March were observed online by our Clerk and some Councillors. There are a number of points arising from all those interactions, and the substantive paper BOS/23/10 considered by the O&SC, that we wish to draw to your attention. (We appreciate that this paper may be amended before reaching Cabinet.)

Features of BDC's Proposals

1. The three communities (Sudbury, Hadleigh and Lavenham) are proposed *to have the same arrangements and charges including Season Tickets*
2. Free periods have been removed, although some concessions are offered for *some community leisure facilities in Sudbury and Hadleigh, but not in Lavenham*
3. Free Parking for Sundays and Bank Holidays
4. Free Parking for Blue Badge Holders *in any bay*

We want to explain to you why these features are unnecessarily bad for Lavenham.

We want to suggest to you measures that will:

- Have a cost neutral effect on BDC's proposals
- Provide a level playing field for commercial activity throughout the week
- Offer a degree of protection to our community health and well-being services
- Offer some reassurance to residents that they can use their BDC car parks at a reasonable cost

We also want to explain why:

- Changes to the parking arrangements in Lavenham should be made on a (on-street and off-street) whole system basis.
- Implementation of BDC's off-street parking proposals should be delayed, until a whole system plan is jointly agreed with Suffolk County Council (SCC).

One Size Fits All

The proposal is that Lavenham should be treated in the same regard as Hadleigh and Sudbury. We recognise arguments in favour of this approach include ease of management of car parks

and establishing similar arrangements for all Babergh residents. However, we consider that there are overwhelming distinctions which we urge you to take into account.

We appreciate and agree with the comment at O&SC paper para 4.5 that “Babergh and its market towns are unique in character.” At its heart, this comment is an acknowledgment that *they are each different from each other*.

Lavenham’s principal difference is that it is a village of 2,000 or so population. It is not a town, and it is inappropriate to treat the three communities in the same way. We take this opportunity to highlight the most significant distinctions:

Distinction 1:

Sudbury town centre attracts shoppers and workers, leisure centre users and commuters using the railway network. It also offers museums and other places of interest. Sudbury offers professional services such as Banks, Solicitors, Accountancy and Estate Agents, none of which have a significant presence in Lavenham.

Hadleigh has a good range of shops and hospitality venues, and both independent and typical High Street retailers. Both the Sudbury and Hadleigh retail and hospitality offers and employment opportunities are significantly greater in volume than those in Lavenham.

The three communities are not equal and should not be treated as such.

Distinction 2:

The centre of Lavenham is significantly smaller than the two towns. Hadleigh and Sudbury provide multiple off street parking choices, coupled with extensive on-street parking restrictions and some time-limited on-street parking.

Lavenham has only very limited off-street parking choices, very few on-street parking restrictions, and no time-limited on-street parking.

Distinction 3:

Lavenham has a much higher profile than the two towns as a tourist destination.

Distinction 4:

Lavenham attracts many thousands of visitors each year, some from neighbouring villages and towns to access shops and other facilities, and also people from further afield who travel to Lavenham *as a leisure destination*. The financial contribution of those visitors is believed to be in excess of £7m per annum to the Babergh economy.

Distinction 5:

In addition to the significant volume of people who visit to experience the historic built-form, many thousands of others enjoy a range of week-end events organised by volunteers or commercial enterprises, particularly during summer. Frequently, Lavenham experiences the need for more parking than it can routinely offer. This is particularly evident at weekends. Donations received on Sundays are higher than Monday to Friday.

We are not clear why the BDC proposals dismiss charging for Sundays and Bank Holidays, as the Lavenham experience is that those days are amongst the busiest periods.

We believe we have made the case that Lavenham is definitely not the same as Sudbury and Hadleigh, and recognition should be given to this fact. We are of the view that *treating Lavenham as a Town is unreasonable*.

Parking in Lavenham

The pattern of parking in Lavenham is such that users do not move from one vacant spot to another to gain maximum free parking time, if for no other reason than there is unlikely to be a vacant place in the other car park and certainly not on the street. This differs from the district wide view expressed in the O&SC paper at para 4.6.

At present in Lavenham, there is an equilibrium in parking arrangements between on and off street, *both of which exhibit parking stress*.

We have three discrete groups of people routinely parking in Lavenham:

- Group A – Local Residents: those with a Lavenham postcode and those from neighbouring villages formerly described by BDC as the Lavenham Core Village hinterland, and broadly comprising Monks Eleigh, Brent Eleigh, Cockfield, Preston St. Mary and Thorpe Morieux.
- Group B – Workers engaged in the local businesses and shops. Most businesses are owner operated with support from part-time staff.
- Group C – Visitors, defined as people travelling to Lavenham for tourism purposes from world-wide locations.

Group A local residents access Lavenham for primary health care, cultural activities, educational facilities, other well-being services and *shops essential for daily living – as well as the village being the centre of their social life*.

Group B largely comprises workers from relatively close-by settlements, which Lavenham Businesses need in order to be able to operate. Those workers are generally not engaged in high value enterprises and are typically remunerated at the lower end on the income scale. *They are essential to the continuation of the retail core*.

Group C normally reach Lavenham by private vehicle. There are two coach parking spaces. It is a rare occurrence when both are in use. Visitors originate from all the world who visit to view and learn about the exceptional heritage built-form, the history of Lavenham in the 2nd World War and in recent years, increasing numbers of people who have a fascination with some examples of contemporary visual arts and literature. Visitors have usually travelled some distance from their point of travel origin.

Enforcement of the very few parking restrictions in place is not consistent. Parking on double yellow lines is a regular occurrence.

Usage and User Differentiation of Lavenham's Car Parks

There is no direct evidence of usage of the Lavenham car parks, unlike Sudbury and Hadleigh where the current ticketing arrangements allow for some data to inform future decisions.

We can advise, however, that Sundays are the second busiest day in Lavenham, measured by the level of electronic donations received. We acknowledge there is an element of seasonality creating higher use during Spring and Summer months. We highlight the proposal at O&SC paper para 6.18 to not charge on Sundays and Bank Holidays, perhaps to encourage more business activity and leisure pursuits in Hadleigh and Sudbury. However, we point to para 6.17 and argue that Chelmondiston is more comparable to Lavenham than Sudbury and Hadleigh.

Most Sunday usage is primarily Visitors who already contribute by donation. We are clear about this because one Sunday per month, the level of traceable donations falls dramatically. This is the day of the Farmers Market which advertises "FREE PARKING IN LAVENHAM". We

do not wish to see an adverse impact on the trade conducted through this award-winning regular event, but not charging at all on Sundays *would give unfair advantage to the event organisers and traders over established Lavenham businesses*. Images of Sunday parking are attached.

The Cock Horse Inn Car Park

This car park is located at the southern end of the village centre. It is one of BDC's car parks that provides the only access to a healthcare facility, the Long Melford Medical Practice Branch Surgery. It is also the only access route to Lavenham's Community Facilities at our Village Hall site which include the Library and Pre-school. Leading from the BDC car park, the Village Hall site includes its own small private car park comprising two Blue Badge, three Pre-school/Library staff and 16 regular spaces. The Village Hall site is managed and owned by Lavenham Community Council.

Our very successful Village Hall provides a range of community- based cultural, leisure and learning sessions on a daily basis in accordance with BDC's Well-being Strategy 2021-27. Some of the sessions have received funding from BDC. Most activities last for 60 minutes. The diary for April 2024 is attached for your reference, where you will see a full timetable each weekday morning. If the number of participants were to reduce, some activities may not be financially sustainable and the Village Hall would consequently lose income. *That would place this valued and essential amenity at high risk of financial failure.*

The Village Hall building also provides accommodation for the public library. The Pre-School operates from a purpose-built award-winning adjacent building. Library visits and pre-school drop-off /pick-up are likely to be adversely impacted by BDC's car parking proposals.

The Branch Surgery has a small private car park of approximately 10 spaces. This is mostly used by staff of the Branch Surgery which operates Monday to Friday. This leaves little space for patients from Group A and Long Melford who have no alternative but to overflow into BDC's car park.

Lavenham's recycling centre is also located in the BDC car park. There is no alternative site within the village. The BDC car park has only two designated Blue Badge spaces.

We welcome the proposal at O&SC paper para 3.7, that "The Director of Operations and Parking Services Manager continue to engage with health, mobile health screening and village community centres which are accessed via or occasionally sited on council car parks, as to the feasibility and appropriateness of utilising the councils' virtual permits and enforcement in managing parking for their patients and visitors. "BDC officers continue to engage with such facilities and centres, as to the feasibility and appropriateness of using its digital permits and enforcement in managing their visitors."

The Prentice Street Car Park

This smaller car park is located in the mediaeval core and principally serves Groups A and B. Signage to guide motorists to it is poor. It is located within a few metres of Market Place which provides on street parking for around 40 vehicles, dissected by Market Lane. This area is almost always full during daytime. Parking etiquette is haphazard in the north section. Market Place is often misunderstood to be a car park.

On-street Parking Stress

Both BDC car parks are used by nearby residents during the day and overnight due to on-street parking stress where they live.

In recent years, it has become apparent that a change in BDC's housing allocations policy has created parking problems, which are often demonstrated by abusive use of the limited green

space within the village. Dwellings which have in the past been occupied by single older people are now being let to younger couples with one or more vehicles. This has created severe parking stress in Spring Street, which affects the Prentice Street Car Park, and Tenterpiece opposite The Cock Horse Inn Car Park.

Housing allocations policy is one factor which has led to overnight parking in the car parks. However, a second factor is multiple car ownership attached to individual dwellings in other nearby streets. A third cause is long stay parking both on and off street, by motorists who frequently leave vehicles for weeks at a time, *because there is no restriction or cost*. This issue was highlighted by Councillor Malvisi at the O&S Committee meeting. It is not unique to Lavenham.

Consequent Impact on Street Parking and the Future

As noted above, Lavenham already suffers from parking stress, which applies daily on-street in High Street, Market Place, Church Street and other streets in the centre of this village. Parking opportunities on-street are so limited that the addition of a small additional number of displaced vehicles leads to traffic chaos. This occurred recently when Water Street was closed for emergency gas work. Charges in car parks will similarly increase on-street parking stress.

The Parish Council received expressions of interest in a residents parking scheme for this area before the announcement of impending car park charges. We anticipate this will intensify in the coming months. There are some double yellow lines in the village, but as also noted above enforcement is minimal.

We wish to emphasise that we would prefer to retain the current equilibrium of Free Parking on and off street, but we appreciate this is not within our gift. Our preference does not come from a wish to seek a subsidy from other Babergh residents or to facilitate unnecessary and environmentally damaging short distance use of vehicles. It is instead a holding strategy whilst a holistic traffic and parking solution is developed and implemented.

The withdrawal of free parking leading to the consequent loss of donation income will make this more difficult to achieve. Initially this donation income was devoted to the costs of bringing up to current day standards: the public conveniences, public seating and other amenities. However, funding to meet ongoing costs has been increasingly found from the precept and these costs are fully absorbed from 2024-25. Our financial plan would have been to utilise future donations to fund projects connected with highways and traffic, because Community Infrastructure Funds are not offered for these purposes.

In parallel, Lavenham Parish Council is working towards the status of General Power of Competence. This will provide the legal powers for us to generate income from our few assets to fund much needed highway and traffic schemes, such as completing the build-outs in Water Street and introducing 20mph speed limits. Those plans are well advanced.

Our suggestions on BDC's proposals

We have been aware for many years that in Lavenham has a serious static traffic problem which will need resolution, and efforts to address this commenced in 2022 with the establishment of a Traffic Working Party. An external study of the village's needs has recently been undertaken, a key conclusion from which is that parking in Lavenham must be viewed as whole system.

Picking out one part of a whole system in isolation ***will make the situation worse in the short to medium term***. We therefore request that the off-street changes are delayed until such a time that there is an agreed Joint Plan for the management of traffic in this village, and that financial support from BDC and SCC to make it happen will be made available.

We are pleased to note the O&SC paper's recommendation at para 3.9 that Officers continue to work with the local councils. We are open and ready for this approach to progress.

If, however, Cabinet Members decide change must be implemented in advance of parallel changes on-street, we request that you reconsider the details of how to achieve the level of income you seeking to raise in Lavenham. In particular:

Two Measures to increase income

- Introduce charging on Sundays and Bank Holidays from 9am to 5pm in Lavenham to align with BDC's Pin Mill Car Park in Chelmondiston. The current proposal of charging only Monday to Saturday is unfair to those local businesses that do not trade on Sundays. It is also an opportunity for BDC to maximise income potential. Evidence from electronic donations in Lavenham is that more income is raised on Sundays than any other days except Saturdays.
- Provide sufficient and appropriately located Blue Badge parking spaces and require Blue Badge Holders to pay the normal tariff, again to align with Pin Mill. Possession of a Blue Badge is determined by disability, and not by financial disadvantage. If this is not taken on board, we predict a significant volume of new applications for Blue Badges from the resident population. In turn this would reduce the spaces available for paying customers.

Two Measures to reduce the financial burden on local residents and workers and to protect local community health and well-being services

- Introduce a Lavenham Car Parks Vehicle Permit Scheme for residents and workers at substantially lower cost than the proposed Season Ticket regime. Employees are generally part-time low-wage earners residing in other villages without frequent public transport services to Lavenham. Economically, Lavenham must be able to remain attractive as a place of employment. We also have a proven need to make available some space for residents to park throughout a 24-hour period due to the on-street parking pressure, particularly those residents living in streets with considerable on-street parking stress.
- To protect community health and well-being services provided for local people:
 - A 60 – 75 minute free parking period between 8am and 1pm in all or part of the BDC Cock Horse Inn Car Park, Monday to Friday; OR
 - A Rebate system for the same parking period in the car park – A simple scheme would need to be fashioned to support this proposal, in conjunction with all the Village Hall services and the Branch Surgery.

We trust Members of Cabinet will find the commentary provided here helpful in reaching conclusions on the proposed car park charging arrangements..

Yours sincerely,

Lavenham Parish Councillors

Irene Mitchell
Lizzie Falconer

Janice Muckian
Jane Ranzetta

Chris Robinson
Mary Morrey

Iain Lamont
Alison Bourne

Lavenham Community Council

Jeremy Bradburne, Director & Secretary