

Covering Note:

This response is from the Clerk to Lavenham Parish Council having taken soundings from Councillors and Members of the Public. A public meeting was held. This response reflects the concerns raised within the constraint that Members of the Public have a range of opinions.

Survey Question 1:

The Council is proposing to vary the tariffs in our car parks to help tackle the financial deficit that we are facing to lessen the cuts or savings we will have to make to other services. At present, the free parking that is provided in our car parks in Sudbury, Hadleigh and Lavenham is subsidised by all council tax payers in the district.

We are committed to ensure that the charges that would be introduced would remain as low as possible and are in line with towns and villages of a similar size across the East Anglian region.

What comments would you like to make regarding this proposal?

Parish Council response to Survey Question 1:

The deterioration in the finances of all local authorities is recognised.

1) The subsidy provided by non-car owners (equity issues):

Whilst it is true that free car parking is subsidised by all council tax payers it must be recognised that in Babergh 88% of households have a car (Census 2021) and therefore the subsidy from those who do not own a car is less than in many other areas. Any suggestion that lower income groups are subsidising more affluent car owners is hard to make. The situation is not as is in more urban areas. The bus service is extremely limited and does not serve some smaller villages at all. Reliance on public transport is therefore difficult or impossible. In our view this point is weak.

Additionally, any introduction of car parking charges is extremely regressive (i.e. further equity issues) in its effects:

The highest house prices are in the centre of Lavenham with much of the social housing stock on the perimeter of the village sometimes as far as 1.3 miles from the Market Place e.g. Peek Close and Harwood.

Income data is not available at a greater level of detail than Lavenham Ward which is in the seventh least deprived decile in the Index of Multiple Deprivation (Consumer Research Centre Data) which suggests there will be a mix of income levels. In Lavenham it is perceived the more affluent live in the centre of the village. Those residents will continue to walk to the retail core whilst those who live further out may have to pay for car parking.

The main employers in Lavenham are retail and catering. Both sectors are characterised by minimum wage and slightly above minimum wage levels. These employers are unable to hire staff from within the village (by observation a sizeable proportion of Lavenham is aged over 65) and so there is a considerable amount of commuting to Lavenham by those who are not highly paid. The imposition of car parking charges on these employees will either significantly raise costs for local businesses or significantly reduce the take-home pay of their employees. There is therefore real possibility that some businesses may cease trading.

2) Harm to economy together with environmental impact and social marginalisation

Lavenham is insufficiently far, ten minutes driving time, from Sudbury to make a trip to the free-parking offered in the Sudbury supermarkets a lengthy diversion. The Lavenham retailers cannot compete with the larger supermarkets, their always available by the shop door car parking and the price and variety of their offer.

Therefore, in addition to the difficulties previously highlighted concerning the hiring and retention of staff the perceived extremely high level of car ownership in Lavenham and local villages presents a further risk to the local economy. This diversion of shopping spend is also environmentally unwelcome.

Any consequential decline of local shops would reduce the quality of life of Lavenham's older population who walk to the shops and for whom their interaction with the long established businesses is very important to their quality of life. A fair number of this group no longer drive and are therefore dependent on their local shops.

Lavenham currently has an extremely stable retail situation but this may change. The high property prices in the village core in which many of the buildings are listed and all are in a conservation area mean, from recent experience, that it can take over 12 months to find a replacement business. There are presently a small number of voids in the retail core (some with dual Class Use both business and residential) and it is expected that those existing voids will become residential use only. A few dual use buildings continue to offer retail opportunity but through reduced footfall, may be at risk in future. Taking all these factors into account, the retail core could be at risk of diminishing and in turn that will impact not only Lavenham but the wider District.

3) Employee Parking:

Many local employers have encouraged their staff to park in the car parks and walk to work and not park outside their places of employment and so inconvenience their customers. The introduction of car parking charges without either the provision of free or low cost employee off-street parking season tickets or the introduction of on-street parking controls will undermine these initiatives

4) Level of Charges:

It must be recognised that Lavenham is a village and not a town. As referred to above its retail offer cannot be compared to Sudbury or Hadleigh and therefore any

charges introduced cannot be comparable. Any similarity of parking tariffs and hours of operation is inappropriate.

Survey Question 2:

The Council published its Parking Strategy in 2022, which outlines both on-street and off-street parking provision for the next 20 years. More information about the Parking Strategy is available on our website at:

<https://www.babergh.gov.uk/w/parking-strategy>

The Strategy looks at the improvement and maintenance of our parking provision to ensure that we have the right level of parking provision in the right places.

Do you have any comments on our current car park provision and facilities?

Parish Council response to Survey Question 2:

The Parking Strategy begins 'developing a parking strategy that would outline both on-street and off-street parking provision for the next 20 years'.

In the light of this aim it is inappropriate that there is no consideration of the impact of the effects of charging for off-street parking to on-street parking in the proposals.

Off-street parking is critically important in this medieval village because of the limitations of the dwellings and the streets. The proposals are not aligned with the strategy.

The importance of off street parking in Lavenham is highlighted in the Parking Strategy Document on page 52 but this has been ignored in the proposals.

“ As part of the parking strategy development work, 2020 Consultancy carried out high-level assessments of on-street parking provision compared to off-street across both districts. The results from this assessment demonstrate that demand for on-street is generally higher than that of the off-street. In particular, the key smaller areas including Needham Market, Lavenham and Debenham where there is limited off-street parking available.”

This Council has for some time received letters, mainly from older residents concerning their inability to park near their homes and how this is curtailing their ability to leave their homes and reducing their quality of life. This correspondence has increased since the publication of the Babergh proposals. It is noted from Babergh's strategy that Lavenham was excluded from consideration for a Resident Parking Scheme as commuter parking was not considered to be an issue. However, the strategic survey did not take into account, dispersal from car parks consequent of tariffs and the impact on on-street parking.

Officers from Babergh and Suffolk Councils have both indicated that neither would provide the resources required to introduce for a residents parking scheme. The Parish Council does not have the resources and any scheme would take approaching two years to introduce. The Parish Council is very limited in what it can do, both legally and financially. It is not acceptable that the authorities responsible for traffic management, delegate this by default to a Parish Council. In

summary the village has been very poorly served by the local authorities who have the legal powers to manage off and on-street car parking. In Lavenham there is only a total of 3 disabled spaces in the 2 Babergh car parks. There are NONE on the street. It is recognised that the parking problems of this village will have grown organically over decades and opposition to change has been a recurrent feature of previous attempts to manage parking.

No consideration has been given to the aim of 'ensuring we have the right level of parking provision in the right places, which meets everyone's needs'. This Council recognises that the parking provision in the village needs to be reconsidered but a total solution needs to be found and this is not it.

Not only has no consideration been given to the impact on 'on-street' parking no consideration has been given to the unique locations of either car park.

The Cock Inn Car Park

This is the larger car park located at the top of a steep hill for those resident in the north of the village and approaching 1 mile from the outer perimeter to the south and west. It is also the space through which vehicles pass to get to the much smaller car parks for the Village Hall, the pre-School and the Doctor's surgery.

The imposition of charges would mean that those generally under-resourced services would then need to invest in their own parking enforcement (barriers, pass codes, fines etc) with consequent deterioration in their offer. In addition, their car parks are too small to fully accommodate their users and employees. As an example, some voluntary organised day-time activities in the Village Hall attract up to 100 attenders including many from neighbouring villages. On the whole these attendees are older people who are encouraged and supported to participate in social interactions to maintain well-being and social inclusion. A reduction in bookings for the Village Hall would create a serious financial risk for the Community Council. Users of the doctor's surgery will generally be in poor health.

This car park is also the car park for the Cock Horse Inn. The introduction of charges, without adjacent on-street parking controls is likely to lead to the road outside filling with cars, the road is insufficiently wide, any such parking would lead to the road becoming single lane.

Prentice Street Car Park

The smaller car park is not easy to find. The directional signage to it is very poor. Despite this it is much used and observed to be used overnight. This usage is perceived to be residents. Changes in allocations policy in former sheltered housing by Babergh Housing has led to the Spring St development being increasingly lived in by younger people, by observation, this has led to severe parking stress and parking abuse in this area. It is perceived that Prentice Street Car Park has partially become an overspill car park for the use of the adjacent Spring Street social housing. Some of the Spring Street development is now privately owned with the consequent renovation works often including converting the front garden into a driveway thus making parking even more difficult for the remaining tenants.

Preparation for Change:

No survey work has been done to establish:

- who uses the car parks
- the duration of a single parking episode
- at what times the car parks are used
- what the dispersal of vehicles will be
- where dispersed vehicles will go

It is also unknown who will end up paying these fees i.e. which local socio economic groups and whether local people or tourists.

It is therefore indicated that before change is implemented, the District Council should establish the likely impacts and have a strategy in place to address adverse consequences. The Parish Council is willing to help with this survey work. Without such a survey it is completely clear that absolutely no consideration has been given to the Parking Strategy aim of 'ensuring we have the right level of parking provision in the right places, which meets everyone's needs'.

To 'enhance the environment' is an aim of the Parking Strategy. Lavenham is already blighted by a wall of parked cars on both sides of the High Street and in the Market Place. The Market Place is the only significant open space within the central core and should serve as a place for village residents and visitors to enjoy. Instead Market Place is an over-crowded, mostly unregulated, informal car park which is deleterious to the environment. Although controversial, there is a view that it harms the economy of the village. As on street parking is free of tariff, it is common that vehicles are parked for lengthy periods, sometimes months, without being moved at all. Residents have also reported that they are sometimes forced into using the car parks for lengthy periods as they cannot get a street space near their homes because none are available. The imposition of selective car parking charges will just make this worse.

Poorly parked cars and the walls of cars frequently make crossing the road difficult. This is especially true for older people but also parents with young children. Any increase in on-street parking will aggravate this. There are no road crossing points in Lavenham and the proposals from Babergh contain no consideration of these health and safety issues. We have not seen a risk assessment and can only assume that one has not been done.

To 'support sustainable transport' is an aim of the District strategy but in Lavenham the public bus service is poor and is considered 'good' only in the publicity material prepared by Estate Agents, The Parish Council has recently led the development of a joint bid with neighbouring local councils for an expansion of the single bus route. We are pleased that this bid is being seriously considered by Suffolk County Council but any funding, if allocated, is time limited and the expectation is that Parish Councils will be expected to provide future funding if loadings are insufficient to support continuation.

To 'attract investment' is another aim of Babergh's strategy which the proposal to introduce car charges neglects to consider. Lavenham will prosper if local businesses prosper as they not only employ local (i.e. from the village and immediately surrounding district) people directly but are much more likely to use local suppliers and contractors than larger businesses. They support local farmers

and tradesmen to a much greater extent than businesses which operate nationwide. This not only boosts local prosperity but reduces unnecessary travel.

Survey Question 3:

In 2020, Civil Parking Enforcement was introduced to Babergh District, with Ipswich Borough Council and West Suffolk Council sharing the on-street parking enforcement duties. This has had a positive effect in many areas.

We understand that varying the tariffs in our car parks could impact on-street parking, but it could also mean that we could encourage more enforcement where required.

What comments would you like to make regarding on-street parking and parking enforcement?

Parish Council Response to Survey Question 3:

There are some streets with double yellow lines but those are in very poor condition. There has been negligible civil parking enforcement in Lavenham. Daily there are already parking infringements. Water Street is particularly noticeable.

Introducing off-street car park charges will lead to increased enforcement costs for both off and on-street car parking. The financial implications are not akin to an increase in parking charges which might lead to little or no change to enforcement costs.

No breakdown has been provided to demonstrate the costs of maintaining free parking car parking in Lavenham alone and the likely change to that financial position of introducing charges. The lack of such a breakdown undermines the financial case.

Survey Question 4:

The Parking Strategy identified that many of our car parks are already approaching capacity and the demand on parking spaces will only increase without better access to sustainable transport solutions. This includes improving public transport, cycling, and walking facilities.

What comments would you like to make regarding sustainable transport, and what improvements would encourage and enable travel without the need for parking (therefore helping to manage the demand on our car parks)?

Parish Council Response to Survey Question 4:

In the centre of Lavenham, some of the footways are very narrow with steps from dwellings being an obstacle to ambulatory movement. Some are in very poor

condition. There are also some very wide footways, e.g. Church Street. There also is a very high incidence of pavement parking. Improving walking routes from the perimeter into the centre would be welcome and the Parish Council would be pleased to work with Babergh and Highways to achieve this objective.

Comment:

In Summary:

The strain on the District Council's finances is recognised but this scheme is not aligned with the District Council's own Parking Strategy and has been insufficiently thought through.

No consideration has been given to off-street parking and the unique built environment (including the specific locations of the car parks) of the village.

Equity issues have not been fully considered and a scheme which might appear to be positive for those on lower incomes is in fact the opposite. The scheme is particularly detrimental to older people.

No consideration has been given to the impacts on local businesses who operate from expensive premises, employ staff recruited from the immediately surrounding district and operate in competition with larger, nationally organised businesses, operating in Sudbury.

Lavenham has been included in this proposal with significantly larger settlements in a completely inappropriate way.

This proposal is environmentally flawed in that it will increase car journeys and lead to deleterious effects on the village environment and insufficient attention has been paid to the poor provision of public transport.