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Mr Adrian Hampton
Head of Local Highways
Wiltshire Council
Bythesea Road
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20th November 2017

Dear Adrian

Car Parking Charges Consultation

Marlborough Town Council has considered its response to the consultation on options for parking charges across Wiltshire. As a corporate body, an online response is not appropriate and doesn't allow for additional comments on the proposals put forward and our Councillors have asked that a written response is given to you as Head of Local Highways.

In general terms, the Town Council is aware of the increasing pressures on budgets but, the link made between surplus revenue from car parking charges and propping up local public transport doesn't really fit with Marlborough. With some of the highest parking charges in the county, we have still seen the recent withdrawal of two bus services and reductions in a commuter bus link to Great Bedwyn Station. This feels like being penalised through a lack of investment in the town, more especially so when it's clear that other towns have received significant investment in new facilities – Corsham (a campus), Melksham (a campus), Malmesbury (a Community Centre), etc.

To help spread the message about the consultation, the Town Council promoted it through its online communication networks as well as informing local groups, including businesses. However, it's clear that the message wasn't received loud and clear by many of your customers – those who actually use your car parks. There were no posters displayed or notices on ticket machines. Season ticket holders were not separately notified nor were those registered for automated cashless parking sent texts encouraging them to take part. So, no real effort made to reach everyone affected. It's been drawn to our attention that there may be an issue around the legalities of that. A ruling following the Supreme Court's 2014 Haringey Council Tax case was that a local authority has to contact all those who will be or are likely to be affected by the outcome of a consultation. That's a given, not best practice.

As part of work towards the Marlborough Area Neighbourhood Plan, a Car Parking Study was undertaken by consultants People & Places which involved face to face and online consultation. The overall analysis concluded that Marlborough was short of car parking spaces, much more so than comparable market towns. Though this is a separate issue, some facts from the study will be still useful in terms of harnessing public opinion.

Two relevant points, both listed under negative perception of car park pricing, were:

- *Qualitative feedback from businesses and town centre users highlighted the need to reduce the cost of parking*

- 71% of town centre users rated car parking as a negative aspect of Marlborough, nearly double the National Small Towns average.

So, unaffordable parking will affect local retailers and businesses and may put town centre users off coming to Marlborough. Or, with a mix of few available parking spaces and high charges, workers and visitors could look to park in more residential areas, or even illegally (blocking accesses, etc.) Add to this a reduced bus service and there'll be an increased reliance on cars – something that all tiers of government are working to combat.

On the options put forward, Councillors had the following comments:

Option 1 – Seeking ways to mitigate against an inflation increase across all parking charges

There is a lack of clarity around how surplus funds raised from car park charges have been used to support other highways services. It's not clear what these other services are and how this is set out in WC budgets. Councillors also asked whether a commitment by Kennet District Council to harmonise parking charges across Wiltshire bringing them in line with those in Marlborough was still to be honoured. Marlborough still appears to be one of those leading the field.

Option 2 – Introduce Sunday and Bank/Public Holiday charging at all car parks. There is no support for the introduction of charges on Sundays and public holidays in Marlborough.

Option 3 – Charge in all Wiltshire Council car parks. At the moment all WC-owned car parks in Marlborough have charges. There should be no move to charge for the 2 hours restricted free parking in The Parade and 30 mins restricted parking on the side of the High Street.

Option 4 – Move free event parking offer in November and December to other times of the year. A withdrawal of the free parking allocations during November and December would mean that the Marlborough Christmas Lights Event could not go ahead in future years (it would cost £2,300 to buy the spaces – unaffordable for the Town Council). In addition, the Town Council has used its allocation to give spaces in the centre of the High Street for the Charity Christmas Tree donated by the Rotary Club - again this would no longer happen should that allocation be removed.

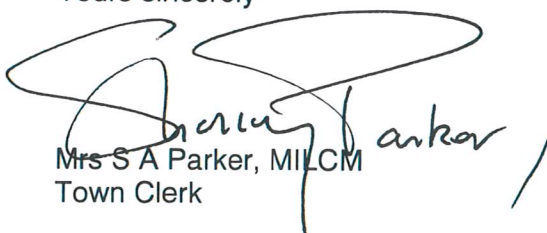
Option 5 – Base season ticket prices on the standard rate charges. Calculations show that this would involve an 82% rise in charges in Marlborough. This would be unaffordable to residents, workers and businesses. Season ticket holders are not guaranteed a parking space so would, on top of the enormous charge, have to pay at the normal daily parking rate if they had to use alternative car parks. One suggestion would be to make Kennet Place a season ticket holders only car park.

Option 6 – Harmonise residents' parking permit charges. There are no residents' parking permit schemes in Marlborough. It needs one.

Option 7 – Reduce the period of time or parking grace from 15 minutes to 10 minutes. Local councils in England must, by law, allow 10 minutes grace after the end of the time paid for before an enforcement notice is issued. Reducing this from 15 minutes is simply adhering to that law. The Council has no reason to object to it.

Option 8 – Proposals for alternative ways to fund from the local community. There have been many occasions over the last year or so where ticket machines are covered or are not working – this clearly has an impact on revenue collected. Better overall enforcement of parking is needed too. Sometimes, Enforcement Officers are not seen in Marlborough for several days. A focus on the non-payers rather than those who pay would help to increase those revenue streams.

Yours sincerely



Mrs S A Parker, MFLCM
Town Clerk