

# The Hadleigh Society

*Caring for Hadleigh – yesterday, today and tomorrow*

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Dear Mr Stiff,

Thank you for consulting this organisation on the draft Suffolk Parking Management Strategy. Obviously as an amenity body it is not practicable to use your SmartSurvey, although members of the Executive have been notified and invited to participate individually if they wish.

The Executive Committee of the Hadleigh Society has considered the six policies suggested as part of the roll out of the Civil Parking Enforcement across the County and the implementation of the Suffolk Local Transport Plan 2011-2031

The general thrust of the six policies is considered reasonable, but there are reservations regarding elements of proposed policies **PMS1 & PMS3**. Our comments regarding the two policies which we deem would benefit from modification, are set out below.

## **PMS1 - Strategic Parking Management**

**This is not supported until the definition of certain phrases in the first and second bullet points are clarified.**

The policy uses the term *...relevant transport aims*; it is unclear whose or which transport aims are being referred to, or what determines *relevant*. The policy PSM1 must be tied to clear terms and definitions otherwise there could be subsequent dispute as to whether the Parking Strategy decided upon is meeting previously jointly agreed terms.

As the parking strategy is part of the implementation of the adopted Suffolk Local Transport Plan it might be appropriate to substitute the phrase of *...relevant transport aims* with *...the aims of the Suffolk Local Transport Policy 2011-2031*. If that is inappropriate, alternative phrasing could be found to ensure there is agreement at the outset amongst partners and stakeholders involved in the implementation of the strategy as to the objectives being sought in the Parking Strategy

The next element in the first bullet point which is of concern is *...helping to balance growth and sustainable forms of...* It has to be queried why it is the concern of the Parking Strategy to seek to control or modify growth of communities, economies and or social connections etc

The growth policies for the County and its respective parts etc are the province of other elected authorities whilst transport and related parking strategy is principally a servant to the implementation and achievement of any declared growth decisions. Therefore it is considered the phrase ought be clarified and substituted perhaps with, *supporting growth and compatibility with county wide agreed sustainable forms of travel*

*In the second bullet point it refers to ...for our strategic towns in consultation with local stakeholders.*

The term “**our**” may appear rather inappropriate for inclusion in a policy that seeks to achieve consensus across the County; it is appreciated that the term may have been intended to imply inclusivity with others, but in the context of the strategy of PSM1, it is felt it is used incorrectly as it suggests ownership of the towns by the County and, accordingly all other organisations are subservient to the County; this is obviously contrary to the declared intent of the County which publicly states that it seeks to work in partnership with others - i.e. on an equal level and respect.

The second element of concern is the use of the term *strategic towns*. There is neither a definition of strategic nor identification of which towns in the County are considered *strategic*. Additionally the term “strategic towns” is neither used, nor are any towns identified, as strategic within either Part 1 or 2 of the Suffolk Local Transport Plan 2011-2031.

The Suffolk Local Transport Plan Part 2 does however identify eleven “**Key Urban Centres**” where transport investment will be concentrated, thus one might chose to identify this list as strategic towns to which the policy is to apply.

The Key Urban Centres are:-

Ipswich, Lowestoft, Bury St Edmunds, Felixstowe, Haverhill, Stowmarket, Newmarket, Sudbury Beccles, Brandon, Bungay

The absence of an agreed definition could lead to disputes as to whether the County has any mandate under policy PSM1 to develop local detailed parking strategies for the many towns in the County that others may not consider to be strategic. It is suggested that the bullet point might be better termed:-

*Local detailed parking strategies will be developed in consultation with local stakeholders for the key urban centres identified as of strategic importance in the Suffolk Local Transport Plan 2011-2031.*

Whatever the final decision some clarification is required in the eventually adopted policy.

### **PMS3 - Parking Charges**

**We cannot support the policy statement as it implies that the norm is that there will be charging for parking in all situations at all times.**

There needs to be recognition in the policy that in certain instances zero pricing is a valid option for all or part of a day or week to meet local needs, requirements or preferences. To seek to override local determination of detailed parking pricing policy is contrary to suggested increased localism that is encouraged by national and local authorities and politicians.

There are also good economic and social reasons for zero pricing, particularly in such a predominantly rural county as Suffolk. Zero pricing can help balance against generation of car journeys to larger towns for services by encouraging residents to use local facilities, as well as encouraging tourism and social cohesion in the small rural historic towns of the county such as

Hadleigh. Zero pricing can also prevent indiscriminate on-street parking caused to avoid any charges with consequent annoyance to residents and added cost to local authority administration of CPE.

Equally important Zero price parking ought also be recognised on certain days or times of the week for attendance of religious services, community, arts and or important social events, both in urban centres and more importantly the smaller rural towns in the district.

Finally the Parking Charges policy needs to recognise that the charging for parking is predominantly a District Local Authority responsibility and certain Local Authorities have chosen, in consultation with its residents, to provide time limited zero price parking in certain of their principal town centres. This democratic choice and decision ought be recognised in the application of the County wide policy PMS3. It is suggested that the policy may be altered to:-

**Where parking charges are deemed appropriate, following consultation with the local stakeholders and partners, the recommended parking charges (on and off street) will be set to take account of the following factors:-  
etc,etc,etc.**

Finally in the last bullet point of that policy the term *..transport aims* ought be replaced with

*...Suffolk Local Transport Policy 2011-2031...*

for the reasons given in our comments regarding policy PSM1

We do hope you will find the comments useful in the drafting of your final Suffolk Parking Management Strategy.

Yours sincerely,

Margaret Woods

Chair Hadleigh Society