

**REPORT ON BEHALF OF THE PROPERTY & PROJECTS GROUP**

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**SUBJECT: REVIEW OF THE OPERATION AND MANAGEMENT OF THE AUTHORITY'S CAR PARKING SITES**

**Purpose of Report**

To provide an initial review of the Authority's car park operation and to make a number of recommendations designed to align car parking services with the Authority's Improvement Plan objectives. It is proposed that the recommendations be implemented as soon as reasonably possible during the 3 year period prior to the start of the 2020 summer charging season.

**Background**

The Authority's car park operation was the subject of a Members Task & Finish Group in 2015 and a paper was subsequently presented to the National Park Authority in November 2015 who resolved as follows:

- a) *the following changes be approved as soon as practical and subject to the relevant amendments to the off-street parking order:*
  - i) *Increase coach charges to £8 per day;*
  - ii) *Introduce free 30 minute 'pop and shop' tickets in some car parks, to include Poppit Sands and Newport;*
  - iii) *Introduce a season ticket valid in a single specified car park at £25;*
  - iv) *Remove transferability from PCNPA tickets;*
  - v) *Install pay & display machines at Newport and Poppit Sands with the provision of information ambassadors at Poppit to be referred to the Provision of Information to Visitors Working Group;*
  - vi) *Negotiate with PCC to include PCNPA car parks in the parking passport and similar schemes.*
  
- b) *The introduction of charging at £1 per hour up to a maximum of £5 at all car parks not be implemented at present.*
  
- c) *The following proposals be agreed subject to consultation, discussion and negotiation with relevant partners before being presented to Members for approval at a future meeting:*
  - i) *Install pay & display machines at Solva, with the provision of an information ambassador to be referred to the Provision of Information to Visitors Working Group;*
  - ii) *Introduce charging at Amroth, Penally, West Angle and Nolton Haven;*

*iii) Negotiate with PCC to prepare a revised off-street parking order in light of the above and to develop a service level agreement to manage the car parks.*

Much of the Members' focus up to and including the November NPA meeting was looking at pre-existing inconsistencies within the pricing structure of parking fees.

The Authority's Support Services Working Group reviewed the subject matter again on the 5<sup>th</sup> October 2016 with the aim of providing a longer-term view of the Authority's car parking operations and the issues which it presents. As a result, the remainder of this paper considers how we might best re-structure our car park operations in pursuit of an improved service and pricing structure for both visitors to the area and local residents with a specific focus on delivering an equitable and efficient business model across the Authority's entire portfolio of car parks (charging and non-charging).

### **The Rationale for Operating Car Parks**

The Authority's car parks provide a vital component in making the National Park as accessible as possible to the millions of people that enjoy Pembrokeshire's world class beaches, countryside and heritage. Ensuring that people can park in our portfolio of car parks is therefore our primary objective. As an Authority we are committed to maintaining our portfolio of car parks to a high standard and, by doing so, the Authority safeguards their functional fitness for purpose throughout the year. Members should be reassured that in terms of this core service delivery we receive very few complaints.

### **The Benefit**

We have an existing portfolio of car parking facilities extending across approximately 37 different sites. Each and every one of these sites provides an identical benefit to the individual motorist i.e. the ability to park a single vehicle regardless of the time of year or hour of day, in a single space within a well maintained and fit for purpose facility, conditional upon the Authority's permissive consent and subject to any published/advertised conditions which the National Park Authority elects to apply in our capacity as the owner operator of the land (i.e. 'the benefit').

### **The Principle of payment**

There is general acceptance amongst motorists of paying a consideration in return for the benefit to park a vehicle in accordance with any advertised rates during those periods when a car park is operating as a charging facility. This is long standing and well established principle extending right across the UK.

### **Authority to Charge**

Subject to any consultation that may be considered prudent or expedient, the Authority retains absolute discretion in its capacity as an owner / operator to introduce whatever charging rates at whatever sites it wishes in-line with the Authority's policies and procedures.

## **The Parking Order**

Quite separate and distinct from our ability to seek a financial 'consideration' in return for providing a parking facility is the discretionary decision to manage the public use of the car parks with the power and authority of a 'Parking Order'.

The Parking Order is the legal document which underpins and provides for the issuing of financial fixed penalty notices as a management tool in response to breaches of the terms of use of the Authority's car parks. The effective date of the current car park order is 1<sup>st</sup> June 2015. Procedures exist to vary the terms of the Parking Order and the Parking Order may need updating (subject to public consultation) following a portfolio wide review of the Authority's proposed enforcement requirements.

## **Charging sites**

We have a current portfolio of approximately 37 public parking facilities. 10 of those sites already operate as charging car parks, while the introduction of charging at a further 4 sites (i.e. Penally, West Angle, Amorth & Nolton Haven) has already been identified by Members for implementation as soon as practically possible.

## **Duration of Charging Season**

The Pay and Display (P&D) season operates from mid-March through to the first week in November. Outside of this period Members are keen to maintain the existing practice of voluntary donations during the remainder of the year. It is interesting to note that Swansea City Council have recently implemented year round charging at their beach access car parks.

## **Duration of Charging Day**

At present the charging day runs from 9am to 5pm only. It is proposed that the charging day should be extended to 7pm (in line with PCC). When considering this issue the principle to be examined is whether there is any discernable difference in 'the benefit' enjoyed by a motorist between the hours of 9am and 5pm compared to 'the benefit' which that same motorist, or any other motorist enjoys during the early evening period between 5pm and 7pm.

## **Pay and Display rates**

The P&D rates should be set in accordance with a PCNPA Charging Policy and be consistently applied across all charging sites at:

Up to 1 hour = £1

Up to 2 hour = £2

Up to 3 hour = £3

Over 3 hours = £5

Public Service Vehicle Coaches (where spaces are provided) = £8

## Season Tickets

While Members rejected any fundamental changes to the pricing structure of our season tickets it is the view of Officers that we should re-visit this issue. The 'benefit' that the Authority offer reflects the right to park a single vehicle in a single space at any single point in time. The cost of a season ticket should therefore be based on its duration and flexibility of use, not its location of use. During the summer charging season 2016 we offered:

- A season long site specific ticket (face value £25) usable at 1 only of our 6 charging car park locations
- A season long generic ticket (face value £70) usable at all locations
- A 7 day generic ticket (face value £30) usable at all locations

This system involves the printing, distribution, retailing, managing and monitoring of not less than 7 bespoke season tickets! It is proposed that the season ticket system is streamlined and simplified across all charging sites to reduce the variations currently in circulation from the current 7 down to 3 and remove the current anomaly of the £25 season long single site ticket at certain sites only as follows:

- A season long ticket (face value £70) usable at all locations
- A 7 day ticket (face value £30) usable at all locations
- A season long site specific ticket (face value £25) usable at 1 only of **any** of charging car park locations

To further streamline and simplify the management of the season ticket offer the following proposals are also made:

- That the issuing of a season ticket for use with a 'nominated vehicle only' be scrapped in favor of a fully transferable ticket. This simplification recognizes that the parking 'benefit' is already restricted to the right to park a single vehicle only at any one point in time.
- That the purchase of a season ticket does not ensure or guarantee the right to or availability of a parking space
- That lost tickets will not be refunded or replaced

## Annual Resident Tickets

We have only one location where an annual resident ticket is offered; Little Haven. This subject was reviewed in some detail by the Monitoring Officer within the last few years following a complaint over that systems operation. Your Monitoring Officer identified that the continuation of the present system is not 'as of right' and therefore remains at the absolute discretion of the Authority.

The principle is to provide those householders lacking their own parking in Little Haven with an off street space for their vehicles. The principle of 'reasonableness' appears to have become diluted or lost over time to the extent that the appeal of the system to its direct beneficiaries is that it currently provides a dedicated space for their exclusive use at all times and with it, a false perception of long term private

entitlement and control of a scarce public asset to the exclusion of the general public. The operation of the finite 22 available spaces, representing approx. 20% of the car parks total capacity, is considered to be inequitable and time consuming to administer.

We estimate that every parking space made available to the general public at Little Haven under the current P&D system generates in the order of £350/£400. The cost of the Little Haven resident's season ticket is £100. It is therefore beyond question that the beneficiaries of the current resident scheme are heavily subsidized by the public purse. It is also unrealistic to suggest a modest £30 premium above the cost of an alternative standard £70 season ticket reflects the significant added value to the permit holder of a reserved dedicate space.

For the vast majority of the year there is ample capacity within the car park for anybody in possession of a standard £70 season ticket to find a space while an unintended consequence of the current system is that during peak periods, reserved spaces are often unoccupied and unavailable for use by the wider motoring public.

For the reasons outlined above it is considered unequitable to continue the existing Little Haven Residents scheme. The existing 22 spaces should therefore be returned to general public use and the previous beneficiaries invited to consider the purchase of a standard £25 single site season ticket (see Season Ticket section above).

### **Short Stay Free Parking**

Members have asked that the principle of 30 minute free parking be retained. The current implementation of this benefit at our charging car parks is neither comprehensive across all sites nor uniform in its delivery resulting in inequality of benefit, abuse by some users and difficulty of monitoring and effective enforcement. It is therefore proposed that the system should be revised and amended across all charging car parks as follows:

- A free 30 minute short stay offer with a 'no return within 4 hour' condition of use.
- There will be no bespoke parking bays reserved for this category of user
- Any user wishing to use this facility will need to display a valid P&D ticket on each occasion
- Breaches of the P&D terms and conditions will be enforced

### **Support for Community Events**

We have historically responded to requests for the suspension of parking charges in support of a variety of events on a case by case basis directly with event organisers. More recently we have referred such requests to the relevant community council, which has proved to be a successful and democratic approach. It is proposed that this approach should continue but with a limit of not more than 3 such event days at any single car parks in any single year and that the event days should not fall on any Bank Holiday or Bank Holiday weekend.

## **Signage**

It is a legal requirement of the management powers afforded by the Parking Order that correctly worded bilingual signage must be on display at every car park where we may want to enforce those powers (whether parking is free or chargeable). It is proposed that we undertake a review of our current parking order signage across our portfolio of car parks to ensure that it is legally fit for purpose, bilingual, standardized as far as possible and fully reflective of the car park order provisions in force.

## **Enforcement**

The benefit which the Authority extends to the public to use both our free and charging portfolio of car parks is widely respected by the majority and tested by only a small minority.

Breaches of this permissive offer to park fall into two broad categories:

- longer term encampments
- short term infringements of a particular car parks published conditions of use.

The former tend to reflect a lifestyle choice of the individuals concerned and the appropriate management tool for dealing with such situations fall with Civil Procedure rules which is outside the scope of this report.

The majority of the latter relate to breaches of the Pay & Display conditions (e.g. overnight parking, non-payment of parking fees etc) and the direct and immediate financial penalty which can be imposed under the provisions of the Parking Order is seen to operate as an effective deterrent.

Enforcement of this deterrent is currently provided by PCC Parking Patrols under a contract with the County Council. It is proposed that the regular summer season patrols which they provide across our portfolio of P&D machine operated charging car parks should continue on terms to be agreed. It is also proposed that as part of any new service contract with PCC, the management tool afforded by the Parking Order should be extended to a small number of National Park Officers (e.g. Rangers, Senior Wardens, etc). This would require their authorisation as well as training and support by PCC to act as Parking Patrol Officers. That authorisation would give key PCNPA staff the ability as part of their normal role, where they deem it necessary, to approach motorists using car parks in breach of the published terms and issue the financial sanction of a penalty notice if required.

## **Car Park Attendants**

We currently operate with summer car park attendants at just two sites, Newport Sands and Solva. Their retained presence is in response to site specific management issues. Subject to obtaining any necessary statutory consents it is proposed that the current cash collection function at both sites be replaced with P&D machines and a separate decision is made on the need or otherwise to retain a manned onsite presence during the charging season to address any ongoing site specific management issues.

## **Ticket Agents**

The sale of parking tickets from National Park outlets is augmented by a small network of external agents who provide this under a commission based incentive scheme. It is proposed that this is reviewed to ensure the cost/benefit of continuing provision and existence of a clear audit trail.

## **Cash collection and routine P&D machine maintenance**

During the course of summer 2016 we have built in additional capacity to ensure that cash machines are regularly visited and maintained to minimize the frequency of 'machine down time' and resulting lost income. The cost/benefit of this approach will be reviewed with the need for any identified changes being implemented.

## **P&D Machine Repair Contract**

It is unrealistic to expect National Park staff to undertake anything other than routine maintenance and simple basic repairs. Machine breakdowns beyond the competence of our staff to repair do occur periodically throughout the charging season resulting in 'machine down time' and lost income. The necessary repairs are rectified by specialist engineers on a 'call out' basis. The cost/benefit of this approach will be reviewed with the need for any identified changes being implemented.

## **Future P&D Payment Models**

We currently run a fleet of 'coin only' operated P&D Machines. The cash handling that this generates involves considerable time and cost. The movement towards cashless forms of payment is now well established across all aspects of daily life and new generation machines are already available to capitalise upon this shift 'towards a cashless payment culture' and our operational model should follow.

It is therefore proposed that, within a time frame to be identified, all of our P&D machines should be upgraded to accept cash less payment and that when ready, this option should ideally be rolled out across our entire charging car park portfolio at the start of the relevant charging season.

It should be noted that to guarantee an effective and reliable cashless payment option each and every P&D machine will need its own fixed landline telecommunication connection. Providing these connections should be investigated and costed as part of a planned move towards the introduction of the cashless payment option.

## **Camper Vans/Mobile Homes**

This is a growing category of user within our car parks. It is proposed that a review of the parking requirements of oversized vehicles should be undertaken, including an appropriate level of charge for this category of vehicle.

### **Financial, Risk & Compliance Considerations**

No issues in addition to those already outlined above

### **Human Rights/Equality Issues**

No issues in addition to those already outlined above

### **Biodiversity Implications/Sustainability Appraisal**

No issues

### **Welsh Language Statement**

No issues in addition to those already outlined above

### **Summary**

This paper has identified a significant amount of work that needs to be undertaken to put in place a more equitable and future-proofed model for the operation of our charging and non-charging car parks.

The identified aim is to deliver a 'standardised offer' which meets the fair expectations of the reasonable user, backed up by a proportionate level of investment, effective mechanism of enforcement, establishment of a contemporary payment model and a modernized cash collection system.

### **RECOMMENDATION**

**It is also proposed that the development, implementation and working of this offer is delegated to Officers and managed by the Estates Officer via the Property and Projects Group with targets and strategy proposals being presented to Members every 3 years.**