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CAR PARKING IN UTTLESFORD CONSULTATION – CONSULTATION RESPONSE BY FIRSTPLAN LIMITED ON BEHALF OF WAITROSE & PARTNERS

Firstplan act on behalf of Waitrose & Partners (“Waitrose”), who operate a Waitrose foodstore at Hill Street, Saffron Walden. As one of only three large-format foodstores present in Saffron Walden – and the only large foodstore in Saffron Walden town centre, the Waitrose store plays an important role in meeting the food shopping needs of residents of Saffron Walden and the wider surrounding area. The store forms part of the policy-defined town centre of Saffron Walden (as defined by the Uttlesford Local Plan 2005) and can be considered to perform a role as an “anchor” store to the wider offer of the town centre. Its location on the southern edge of the town centre provides it with strong connections with other shops and services in the town centre.

We have been made aware of a formal consultation which is being undertaken by Uttlesford District Council (‘the Council’) on car parking charges across the local authority area. This consultation is of direct relevance to our client’s interest in respect of the Fairycroft car park, which is a decked car park adjacent to the rear of the Waitrose store which is used by both Waitrose’s customers and wider users of the town centre. The joint role which this car park plays is reflected in the fact that signage on the exterior of the car park carries Waitrose branding, and the car park is stated as being for “Waitrose & Town Centre” above the entrance. Signage within the car park also carries Waitrose branding, and the car park includes Waitrose trolley bays for customers to return their trolleys once they have finished loading their vehicles. Waitrose customers are able to have their parking charges refunded when spending over £10 in the store; the Fairycroft car park thus acts as the defacto car park for the Waitrose store.

The Fairycroft car park is a short-stay car park with parking capped at a maximum of three hours. Currently, the Fairycroft car park operates with the following payment arrangements (Monday to Saturday 8am to 5pm):

- Up to 30 minutes: £0.50
- Up to 1 hour: £0.70
- Up to 2 hours: £1.20
- Up to 3 hours: £2.00
- Sunday parking: free

The proposals which are the subject of the current consultation suggest the following adjustments to the price of short stay car parking at Fairycroft:

- Extension of chargeable hours from Monday to Saturday 8am-5pm to Monday to Saturday 8am-6pm
- Removal of short stay (up to 30 minutes) option
- Up to 1 hour: £1.20 (**71% increase**)
- Up to 2 hours: £2.20 (**83% increase**)
- Up to 3 hours: £3.20 (**60% increase**)

- Flat Sunday parking rate of £1.50

The consultation is also of relevance to our client's Partners, many of whom work for shifts at the Waitrose store which exceed the maximum three hour stay at the Fairycroft Car Park. Consequently, many of Waitrose's Partners who drive to work park at the Swan Meadow Car Park, on the western side of the town centre, under ten minutes' walk from Waitrose. This a Long Stay car park which operates with the following payment arrangements (Monday to Saturday 8am to 5pm):

- Up to 1 hour: £0.70
- Up to 2 hours: £1.20
- Up to 4 hours: £2.00
- Up to 6 hours: £2.50
- Up to 9 hours: £3.50
- Sunday parking: free

In addition, the following monthly parking permits are currently offered for people employed in Saffron Walden. Given the nature of their roles within the store, many of Waitrose's Partners utilise the monthly and annual permits.

- £30.00 for one month
- £90.00 for three months
- £175.00 for six months
- £300.00 for 12 months.

The proposals which are the subject of the current consultation suggest the following adjustments to the price of short stay car parking at Swan Meadow:

- Extension of chargeable hours from Monday to Saturday 8am-5pm to Monday to Saturday 8am-6pm
- Up to 1 hour: £1.20 (**71% increase**)
- Up to 2 hours: £2.20 (**83% increase**)
- Up to 4 hours: £3.20 (**60% increase**)
- Up to 5 hours: £3.70
- Up to 10 hours: £4.70
- Flat Sunday parking rate of £1.50

The pricing of the monthly permits is proposed to be increased as follows:

- £75.00 for one month (**150% increase**)
- £200.00 for three months (**122% increase**)
- £350.00 for six months (**100% increase**)
- £550.00 for 12 months (**83% increase**)

On behalf of our clients, we wish to strongly object the proposals to increase the car parking charges at both the Fairycroft and Swan Meadow sites. Specifically, we object to:

- (i) The proposed increase in fees within all parking time brackets at both Fairycroft and Swan Meadow.
- (ii) The extension of charging hours from 5pm to 6pm, Monday to Saturday.
- (iii) The proposal to introduce charging for parking on Sundays at both Fairycroft and Swan Meadow.
- (iv) The significant increases in permit parking fees proposed for Swan Meadow.

The increases in the charge rates for short-stay parking at both sites is almost 75%, and for longer permits at Swan Meadow, the cost of a monthly, three monthly and six monthly permit is proposed to at least double, with an annual permit also increasing by 83%. It is not considered that such a significant level of increase in parking charges is justifiable, particularly in the context of the ongoing cost of living pressures.

In respect of points (i) to (iii), our client is firmly of the view that increasing the parking fees across the town centre car parks will simply have the effect of dissuading residents to visit the Waitrose store and wider town centre, or to reduce the amount of time they spend in the town centre when they do visit. This will have a negative impact on the town centre as a whole, as it will discourage residents to spend longer in the town centre, reducing “dwell time” and spend in the town centre’s range of shops, cafes and restaurants. The proposals to extend charging hours from 5pm to 6pm have potential to negatively impact on the town centre’s early evening economy, which Waitrose supports by being open until 8pm between Monday and Thursday and 9pm on Fridays and Saturdays.

Significantly, the proposed changes to the parking charges have the potential to dissuade residents to visit the town centre to undertake their food shopping. Waitrose already operates at a competitive disadvantage in this respect on account of the charges levied by the Council-operated car park adjacent to the store. The increased charges will instead push residents to other foodstores outside the town centre to undertake their food shopping, which are able to offer free car parking. This will have a detrimental impact on the wider town centre, given that Waitrose acts as an “anchor” store, meaning it drives footfall and helps support other businesses in the town centre.

The Council have recently commissioned a consultant, Nexus Planning, to provide strategic advice on the District’s town centres and the need for new retail floorspace, in support of their new Local Plan. This advice was supported by a detailed survey of patterns of usage of town centres across the District. This identified that:

- **76.4% of residents who use Saffron Walden town centre access the town centre by driving, with only 2.6% accessing by bus.** This confirms that the availability of affordable car parking is of critical importance to the retail health of the town centre. Given there is no train station serving the town centre and very low levels of accessibility by public transport, increasing car parking rates will not result in a modal shift to other forms of transport, it will simply discourage people to visit the town centre.
- **16.0% of residents living in the Saffron Walden area visit the Waitrose store for “main” (i.e. trolley-based) food shopping trips.** These type of shopping trips require adjacent car parking, and indeed the popularity of our client’s store for this purpose is reflected in the fact that the Faircroft car park was subject to extensive upgrade and extension works under ten years ago. As stated above, by increasing car parking fees, residents will be put off from visiting the store to undertake main food shopping trips, particularly those which are combined with visits to other facilities in the town centre (for which parking charges cannot be refunded by Waitrose), and will instead direct their spending elsewhere in the town (i.e. to Tesco and Aldi) where free parking is available. Waitrose already operate at a competitive disadvantage to other supermarkets in Saffron Walden on account of the parking charges, and our client is of the view that this situation will be significantly worsened if the proposed changes to parking arrangements are adopted.
- **39.7% of residents in the Saffron Walden area visit the Waitrose store for “top up” / basket shopping.** This confirms that the store acts as an important footfall driver in the town centre, and it is reasonable to expect that many people who use our client’s store for “top up” shopping will also undertake similar shopping purchases elsewhere in the town centre. As Waitrose is only able to refund shoppers when over £10 is spent in store, the increased changes are likely to dissuade shoppers from doing small scale “top up shopping” in Waitrose alongside similar trips to other town centre stores.
- **41.4% of residents who live in the Saffron Walden area undertake “linked trips” as part of their main food shopping trips.** This includes including non-food shopping (10.9%), other food shopping (7.3%), leisure

activities (5.4%) and visiting food & beverage outlets (4.3%). The scope for these “linked trips” will be reduced if there are price-critical considerations such as increases in parking fees.

The above points confirm importance of the Waitrose store in supporting the overall vitality of Saffron Walden town centre, and by increasing the parking charges to the Fairygate car park, our client is of the view that there will be an adverse impact on the store, and, given the role our client’s store plays in supporting the wider vitality of the town centre, there is also scope for other businesses in the town centre to be negatively impacted.

In respect of point (iv), as we have noted above, the Swan Meadow Car Park is used by many Partners who work at the Waitrose store given the restriction on the Fairygate car park as a short stay car park. The increases to the parking fees which are proposed here, including a 150% increase on a monthly permit and a 122% increase on a three month permit, are wholly unjustified. Such increases will represent a substantial additional financial commitment for Partners and other residents who purchase permits for the car park, during a cost of living crisis and continued and persistent high levels of inflation. For other uses, as above, they will serve to discourage usage of the town centre and towards competing facilities where free or cheaper car parking is available.

Whilst the financial benefits to the authority of increasing parking charges is noted (and indeed is understood to the driver behind the proposals), seeking the introduction of such measures is failing to understand the wider impacts of such measures on town centre vitality and viability. The evidence which has been prepared by the Council’s consultants in support of increasing the parking charges fails to fully consider this point. Instead, the discussion between town centre footfall and parking charges which has been included in the report appears largely generic, references a number of reports which could be argued to be out of date (various reports dated from between 2012 and 2015 are cited) and cites evidence from the University of Rotterdam, the findings of which should not be assumed to be directly relevant to the proposals in question. There appears to be a clear lack of assessment at the local level of what the impacts of the proposed increases in parking charges will be on the health and viability of Saffron Walden town centre.

We are also of the view that proposals to increase parking goes against the grain of the approach taken by many authorities, who have recognised that affordable / free car parking can positively impact a town centre by bringing in additional footfall and spend. Bedford Borough have recently trialled four hours free car parking in Bedford town centre, and proposals for two hours free car parking on a daily basis is shortly to be debated by Swindon Borough Council. Durham County Council has confirmed they plan to reconsider recent proposals to charge for car parking after 2pm following concerns it may be contributing to a decline in footfall in the County’s town centres.

On the basis of the above, on behalf of our clients we object to the proposals and strongly request that the Council consider alternative means of additional revenue generation. The Council will be aware that town centres in general remain in a precarious position as a consequence of changing consumer habits, and many authorities across the country have sought to reduce or remove town centre car parking charges in order to help support healthy town centres. The current proposals by the Council thus seem highly counter-intuitive in this respect, and it is hoped the Council will reconsider its approach.

I would be grateful if you could please acknowledge receipt of these comments. On behalf of our clients, we wish to be kept informed with any further consultations and the next steps which the Council are proposing to take in respect of this matter.

Yours sincerely



ADAM BUNN
Senior Associate

cc — Lisa McDonald, John Lewis Partnership