

Camberwell Visitor Parking Consultation Proposals for November 2013

Response by Visit Camberwell

on behalf of

Camberwell Business Network (CBN)

CBN would like to thank Southwark Council (**SC**) for the opportunity to comment on these proposals, and welcomes any design proposal treating visitor parking as a significant component of town centre access.

Our response takes the form of a series of headings referring to assumptions currently made about visitor parking within SC which CBN considers to be harmful not just to local businesses, but also to the interests of the majority of residents (and of the overwhelming majority of poor, disabled and elderly residents) of Camberwell.

SC ASSUMPTIONS

“Why we don't have free parking”

There is a suggestion that free parking is not cost-effective to enforce. Current TfL short spaces are adequately enforced, and enjoy a high level of civic obedience due to their location close to the high street and a perception that they will be enforced in that location. Additionally, Lambeth Council is able to enforce free short-stay spaces.

If the current SC parking contractor is not able to enforce free short-stay, CBN has offered (since December 2011) to enforce parking itself in Camberwell. CBN also indicated a capacity to enforce differentially where spaces are reserved for the use of electric or micro-cars only, and to work with systems of reactive pricing. This offer was dismissed in principle by SC in April 2012 without the opportunity for CBN to make representations to Cabinet on the full benefits to the economy and local residents of this approach. Hopefully, dialogue can be resumed on the benefits to residents, and the logic of local businesses mirroring the way that supermarkets enforce their own free short-stay, where traditional parking contractors have indicated they do not have the resources for this.

CBN's preference is not for free parking, but for a level playing field with big business. In circumstances where supermarkets exist within a 3 minute drive that have several hundred free parking spaces, free parking should remain a significant component of town centre access in Camberwell.

Evidence – a data-based approach

The consultation document suggests there is no evidence that a lack of free parking damages the high street (top-left). There is definitive evidence that if parking access to a town centre is overpriced, difficult to use, or perceived as being these, there is a direct causal link with high street decline which goes beyond correlation. This is contained in the Association of Town Centre Managers annual report on town centre health in the UK.

CBN recommends the following evidence-based approach, using information already in SC's possession, could be collected at little cost, or which could be arranged by a third party (TfL) at no cost to the Council:

1. Publish the target occupancy rate per visitor space near the town centre. In town centres in America, 80% target rates during trading hours are used.
2. Collect % occupancy information on the nearest 200 visitor parking spaces to Camberwell town centre, based on payments made for each machine or pay-by-phone code, and averaged across the 200 spaces.
3. Collect % occupancy information on the nearest 200 free parking spaces to Sainsbury's Dog Kennel Hill supermarket, for comparison to town centre occupancy rates.
4. Work with TfL to use video survey evidence and licence plate recognition to cross-check against the Council's own database of permitholders, to help understand how much direct planning control the Council has over car use locally, through its planning powers. Depending on the times of individual surveys (e.g. Saturday), car use will give a strong indication of shopping and leisure preferences of local car owners and their contribution to pollution and congestion.
5. Obtain information on the amount of jobs done in Camberwell (as opposed to local

employment levels) going back at least 10 years, and publish this to understand the trend.

6. Obtain information on average and overall rateable value in Camberwell going back at least 10 years, and publish this to understand the trend.

“Visitor Parking is bad for the environment”

Visitor parking in Camberwell town centre and local centres derives mainly from existing journeys and traffic flows for other purposes. So this visitor parking makes – and would make – little *net* contribution to congestion. Visitor parking to supermarkets comes from dedicated car journeys, creating a significant *net* congestion and pollution which would not otherwise happen.

Visitor parking should continue to be a major factor in town centre access unless measures are taken which discourage supermarket visitor-parking in an equivalent way. This could include CPOs to reduce the size of supermarket car parks, or compulsory licensing to force supermarkets to charge for parking.

“People are choosing to shop in supermarkets. We can’t do anything about this”

While there is clear evidence that overpriced parking damages the high street, there is no evidence that most people choose to shop at supermarkets where there is equal access to the high street in terms of parking facilities.

By every metric, Camberwell's local high street and economy has declined since the 1990s, irrespective of boom and bust. There is less variety, fewer specialists and no bookshops, fewer “white goods” offerings, less local manufacture, office and warehouse activities. Added to this, there is less public sector employment in Camberwell since the Council's relocation. Urgent action should be taken to promote the private sector's role in compensating for this employment loss.

The current £11M capital spend on Camberwell does not fall into the category of action for business because although it is a welcome improvement to the public realm, lessons from Walworth Road are that capital investment alone does not translate into improvements for

local business, and can actually be paralleled by an increase in empty shops and betting shops.

“Pedestrians are the most important transport mode”

CBN has always agreed with the hierarchy of planning for amenity areas:

1. pedestrians
2. cyclists
3. public transport
4. visitor parking

The important principle for Camberwell is that the nearest visitor spaces should be nearer and more convenient to the high street than the nearest spaces available to the minority of residents who own cars in Camberwell. This is because the majority of local residents have an interest in protecting local shops with visitor parking to improve their own local goods and services, and this resident majority has no interest in “resident-only” on-street parking.

The aspect of policy which CBN seeks to influence is to prioritise visitor parking over resident-only parking near shops. There is no conflict with pedestrian, cyclist and public transport initiatives.

In terms of impact on the high street, Council policy is that because drivers represent a minority of customers by transport-mode, there should be no useable visitor parking. Yet even by conservative estimates visitor parking contributes to at least 20% of turnover, and possibly a majority of customers where specialists such as bookshops and white goods offerings are concerned.

The proposal that because pedestrians constitute a majority of the custom base, 20% of custom (car drivers) can be removed from it, is not tenable. CBN invites the Council to imagine cuts to its budget of 20% or greater, as opposed to the 5% of loss of existing turnover from Government cuts, as a way of understanding the damage caused to the local economy through current parking policy.

Groups such as Living Streets which promote the idea of the pedestrian as customer *and* assert that visitor parking is not relevant, should be required to declare the car ownership interests of those attending meetings approving their recommendations, and of report authors. This is to help assess whether their criticism of visitor parking is based on a passion for pedestrianism, or perhaps on a desire to maintain their own on-street car storage.

It is impossible to know how many drivers would choose to visit Camberwell to shop if parking were reasonably priced, accessible and easy-to-use. Until the Council adopts the metrics recommended above, we will not know this, and current Council figures giving a small proportion of car drivers forming a part of custom for shops must be considered as an underestimate.

All we know for certain for now is that the Camberwell high street, inside and outside the town centre, does not have enough customers. In these circumstances, the low proportion of customers visiting as drivers can more easily be used to suggest parking is too difficult for them, than suggest they are not a natural component of visiting custom in current market conditions.

“We will keep existing hours of enforcement, as they are currently in use”

Most residents do not own cars, so there is no civic argument that hours of enforcement near shops should be structured around the habits of local motorists. As discussed above, the majority of Camberwell residents do not own cars and have an interest in the vitality and range of local goods and services, so more of an interest in visitor parking than resident-only parking.

The Council should conduct a full survey of trading hours, including the independent grocers whose hours are 0700-2300, in order to help protect the local economy from a minority of residents positioning their cars in areas which inhibit access to the town centre during its key (evening) trading hours, damaging employment and economic growth in Camberwell.

COUNCIL PROPOSALS FOR INDIVIDUAL STREETS

Camberwell Grove

This is the most important visitor parking street in Camberwell, siphoning custom for the high street both from the busy A202, and most directly from wealthy South Camberwell, East Dulwich and Dulwich Village. A buffer zone of at least 100 metres should be introduced, in which no residents can park during hours of enforcement.

CBN does not believe that the pay-by-phone spaces will be widely used, and encourages SC to use the metric methods outlined above to monitor their effectiveness and keep them under review.

The conversion of two resident spaces is a welcome principle, but not adequate in terms of the shock therapy which the town centre and unemployed local youths need. The effectiveness of paid parking should be measured with receipts against trading hours. In the current climate, the loss of TfL free parking (following existing losses on the main high street) will contribute to a further loss of custom to the town centre, and a proliferation of empty shops and betting shops.

The number of new spaces created (two) also falls below the number removed from Datchelor Place. There is some concern that some of the residents who lobbied for this removal are also active in lobbying against more visitor parking in Camberwell Grove, to maintain this for CPZ car storage instead. Camberwell Grove is the logical place for a transfer of the spaces (between 6 and 8) formerly in Datchelor Place, as the nearest accessible street with the highest potential for attracting customers with disposable income.

As discussed above, it is widely accepted that Camberwell town centre does not have enough customers. Until that is no longer the case, it should not be controversial to displace residential car storage in order to maintain parity of visitor parking space numbers, since this does not conflict in any way with pedestrian or cyclist initiatives.

Ruskin Street

Identifying a street outside the town centre is a positive step, in recognition of the “stepping-stone” effect of custom which will bring benefits to the town centre, as well as those in need of services within a few minutes' walk. The Council is encouraged to plan similarly for other satellite amenity areas in Camberwell such as Camberwell New Road, Coldharbour Lane, and Southampton Way.

Removing resident parking from outside shop fronts is positive, as resident cars near *or adjacent* to shop fronts discourage pedestrian and cycling movement, and inhibit the view of shop fronts by passing road-users. Businesses do not expect that pay-by-phone will be used, and expect a game of cat-and-mouse between customers and parking enforcement. As with Camberwell Grove, paid parking occupancy should be measured and a % occupancy target provided by the Council.

Proposals to charge for on-street storage of tyres and bicycles ancillary to the operation of local businesses should be re-thought as they are a recipe for conflict and differential enforcement. These uses do not inhibit sight-lines or general movement in the same way as resident cars, take up less space than the average resident car and are arguably a part of the character of the local area.

At the least, these businesses should be charged no more than a residential parking permit price for on-street tyre and bicycle storage. Since motorist residents using permits form little more than 10% of the local community, local businesses should be entitled to equivalent pricing for spatial use of the kerbside, since 90% of the local community has a greater interest in the welfare of those businesses than in resident permit pricing.

Valmar Road

The removal of some visitor parking up to the entrance of the trading estate is welcome, as consistent with the principle of establishing buffer zones around shops within which there are no resident cars stored long-term. However, this should be done for both sides of the street. Pay-by-phone parking is unlikely to be used – the Council is urged to use metric methods to

analyse occupancy (see above) and also have a target % occupancy rate for this area.

QUESTIONNAIRE

The document is currently too open-ended. Previous “invitations of ideas” have not resulted in useful information about resident opinions on how the kerbspace should be used, other than for car storage. We know that most Camberwell residents do not own cars, so will be interested in any other kerbspace use than this.

Council should pro-actively invite residents to rank possible uses for kerbspace other than resident parking, both within 100 metres radius of the town centre boundaries and outside that area.

These options of kerbside uses should include (amongst others the Council identifies):

- resident-only parking
- free short-stay visitor parking
- paid (by coin/cash/card) parking
- paid (by-phone) parking
- cycle storage
- soft surfacing (like artificial sports pitches) for lower-impact aerobics exercises in the street
- tree planting
- shrubs or flower boxes

It is important to reinforce alternative kerbspace uses wherever possible, and to recognise the stake of the majority of residents in this.

CBN believes that the Council already has a strong understanding – following the CBN walkabout in 2012 - that shared parking is mostly used by residents during trading hours so is not truly shared, and provides negligible benefits to local businesses. CBN encourages the Council to put out the message that “shared parking does not work” with equal prominence to the “no free parking” message, and of course to use data-based metrics outlined above to test

existing assumptions about the useability of visitor parking in Camberwell, as currently planned.

NOTE

This document may be reviewed as consultation with businesses is ongoing to shape it fully.