

Summary of representations

- a) Chairman Castle Street and District Residents' Association (objection correspondence 26)
- b) St Peter's church, Hereford (objection correspondence 52)
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- e) Hereford BID (objection correspondence 99)

a) Chairman Castle Street and District Residents' Association

As Chairman of the Castle Street and District Residents' Association I wish on behalf of our residents to comment on the proposals for the introduction of on-street parking charges and other parking restriction changes in Hereford's historic core in 2017 as laid out in the draft Hereford City Centre Order 201 you circulated for public consideration.

For many years, the Castle Street and District Residents' Association has argued strongly for some Residents Only Parking and reduced parking times for non-resident parking in our zone. We have also supported charges for on-street parking. We all want to see a much calmer, safer, less polluted, healthier environment on our streets, plus easier parking for residents. We must redress the longstanding but continually worsening traffic and parking scene on our streets.

The proposals contained in the draft Hereford City Centre Order 201 go a good way towards meeting our requirements and were, except for one aspect, most strongly endorsed at our Annual General Meeting held on 21 November 2016.

The exception was that it was proposed at the AGM, and carried, that the parking restrictions should extend to include Sundays from 8am to 6.30pm. This is because Sundays have become at least as busy in terms of on street parking as any other day of the week. Moreover, on Sundays cars exploit the ability to park freely on single yellow lines, causing even worse obstruction and nuisance to residents. The vast majority of residents see no reason why Sundays should be treated differently, especially so since they note that in streets near the hospital residents-only parking applies 7 days per week. We therefore ask that the proposed regulations in Hereford City Centre Order 201 be amended to include restrictions on Sundays, not least at paras 6,7,8 and 9 of the draft order.

If you require any clarification of our views then please contact me.

b) Outreach facilitator, St Peter's Church

Dear Sir/Madam,

I am enclosing a list of all the events and services which St Peter's church, the Civic Church, tries to maintain for the city centre.

We realise that the city authorities are having to bring in car parking charges to make money for the council to use in servicing the needs of the city, to reduce congestion and the effects of exhaust fumes from cars coming into the city.

However we feel that these charges will have an effect on the running of this and other inner city churches and the enclosed list will give you some idea of what goes on in this church as it tries to serve the city centre. Unlike the shops and offices we are not in the city to make money or profit but to serve the city.

When the original car parking changes were made 17 years ago the city authorities put in a loading bay outside the church which we could make use of. During the last reorganisation the use of this bay at weekends was removed so we at St Peter's had nowhere for our elderly and disabled to be dropped off as they came to use the church facilities or to attend church services, for the unloading of equipment for weekend church events or for people bringing in food for Open Door or for feeding the homeless on Sundays. We now find our elderly ladies often dragging heavy bags with sandwiches and large soup flasks from car parks to the church on Sunday morning rather than just being able to carry them the short distance from the loading bay to the church.

We feel that this is somewhat unfair on our community here at St Peter's as the authorities still request that we run the night shelter, ask us to send out our member as Street Pastors at night, are happy for us to keep the city flower beds cleared of debris and the weeds removed so the area outside the church in this central part of their city looks presentable for the tourists to the city. All this of course we are more than pleased to do for the city.

We would ask that as you deliberate these changes to car parking and the instillation of meters that you would bear in mind our concerns so that we can continue our service to the city which has been going on from this church since 1084.

Impact of Parking charges on St Peter`s church, Hereford

We have tried to assess what the impact on St Peter`s, Hereford`s Civic city centre church will be with the introduction of car parking charges in the town centre. I am listing all that goes on in this church as it tries to serve the city centre and the times when our members or helpers come to the church and if coming from outside the city centre will be liable for car parking charges. In all these activities unlike the shop and offices we make no money out of our service to the city and a larger part of the weekly collection by this community goes to maintain its presence and service to the city.

1. Vicar and Curates whenever they attend their church and have to come by car for services or meeting with those wishing to discuss having a baptisms, wedding or funeral or any other church business.
2. Church wardens (2) every time they attend church which is often several times in the week and twice on Sunday.
3. Parishioners will have to pay to attend 8 am Communion, 10.30 am Morning worship, 6.30 pm Evening worship on Sundays.
4. Worshippers coming to Morning worship Tuesday 8 am, Wednesday Communion 11am.
5. Members attending Prayer hub on Thursday at 11 am.
6. Civic services for the city council events... requires our member to be hosts.
7. Parish administrator or equivalent volunteers will have to pay each day they attend to man the office, usually at least 3 days a week, to undertake the administration of the church.
8. Four stewards during the day, trying to keep church open every day and to allow public access to this place of worship, prayer and refuge for those in need or distress.
9. Volunteers manning the Night shelter shifts during the 5 months of the year where we house the homeless in the city at the request of the city authorities.
10. Volunteers from the church going out on patrol as Street Pastors or helping at Amelia`s place on Friday and Saturday nights from 9.30 till 4am. Again brought in at the request of police and city authorities.
11. Members attending **daytime meetings** in church or Church house such as,
 - a. City church ministers meeting. (Baptist, Methodist, CLC, Elim, Freedom, city Anglicans)
 - b. Business meetings within church or negotiations with other organisation wanting to rent church facilities or put on events or to go through the use of building for those running public and city events in our church.
 - c. Meetings with and by Ben Lea and members of Close House staff and youth group in St Peter`s, the only Youth group in the city centre.
 - d. Meetings with groups such as Homeless forum, Open door, Architects assessing state of church buildings, fire safety officers, electrical safety assessments etc.
 - e. Regular meetings with Night shelter staff to assess the progress of the running of the winter night shelter during the time of night shelter operations.

Meetings held in church or church House during the **evenings or weekends.**

- a. Parish church Council every two months
- b. PCC Sub committees.
- c. Church Leaders meeting every month
- d. Worship leaders meeting once a month.
- f. Men`s breakfasts once a month.
- g. Men`s group night once every 2 months
- h. Major events at St Peter`s e.g.
 - a. Civic Dinners with our congregation, city councillors, students, shopkeepers and businesses helping to bring about communications and wellbeing and support to the people of the city.
 - b. Faraday Institute for Science and Religion conferences.
 - c. Specific Christian events such as Graham Kendrick concerts.
 - d. Education conferences such as College of Preachers, Healing Issues, `God loves the NHS` service supporting NHS staff etc.
 - e. Services for Armed services, Haven Breast Cancer,
 - f. Concerts put on by various choirs e.g. Police choir for charity events.

All of these need manning and hosting by members of St Peter`s church.

9. Day time staff manning the following organisations who use our facilities for the public good.

- a. Members helping with the St Peter`s elderly lunches for lonely and isolated elderly in the parish.
- b. Open Door Mondays and Thursday feeding the homeless.
- c. Tuesday café run by members of the learning disabilities group.
- d. Fitness club for those with learning disabilities.
- e. Antenatal classes.
- f. Health Authority mums and tots group.
- g. Members attending Church events with Thomas Cantilupe Primary school that regularly uses our facilities for Christmas, Easter, Harvest and end of year services.
- h. Staff member attending drop in Centre for the Deaf Community of Hereford.
- g. Those giving out Sunday Soup and sandwiches given out to the homeless at 11 am...feeding from 40 to up to 60 folk in the cold winter months.

All these organisation are supported or run by this church as a service to the residents of the city. Unlike shops we aim not to make profits. Most of the weekly giving from this Christian community

goes to maintain this church and its activities as we seek to serve those who pass through our doors or those living, working or visiting our great city.

We fear that this Civic church runs the risk of having to diminish its activities and service to the city if our members have to pay for each time they come in to serve in this Civic church.

We would like to find some sort of solution to this dilemma we find ourselves in so that we can continue the witness to the gospel and service to the people of this great city which has gone on from this church since 1084.... Way before cars and car parking charges were ever thought of!

c) Chapter Clerk and Chief Executive, Herefordshire Cathedral

I write with regard to your letter of last year concerning the above proposals and the consultation process which concludes on 6 January 2017. Our response primarily responds to the proposal to introduce pay & display parking to those streets named in section one of the Notice of Proposal paper circulated.

Please note that when we refer to our visitors, many of them are resident within the county of Herefordshire and our reference does not refer to only those from outside the Local Authority's area.

Firstly, may we state that we are highly concerned at the economic and cultural impact that the on-street pay & display parking will have on the city and its significant impact on the Cathedral, in terms of it being both a place of worship and the key regional tourist attraction. Indeed, over the Christmas/New Year period, we received considerable comments from visitors who were concerned about the introduction of the charges and they confirmed that they would not have been staying as long in Hereford if they had to pay the charges being proposed. In addition, they confirmed that they would have shortened their visit to us, including visiting the Mappa Mundi exhibition, Cathedral café and shop - all important revenue generating operations for the Cathedral - if they were conscious of the expiry of a parking ticket. While the instigation of the charge may benefit the Local Authority, it will have a negative impact on our economic viability, a position which is already challenged.

Our Visits Manager has already raised concerns about the impact on our visitors, many of whom are elderly and live within the Local Authority's area. With the addition of parking meters and the potential loss or reduction of the number of designated spaces in Broad Street in particular, they are feeling very vulnerable. In addition to the loss of their support to us as visitors and volunteers, many lose vital social interaction with others, potentially increasing the demands on Social Services. The associated loss of regular spend on business in this sector of the city will further exasperate the concerns that local businesses have that the focus of any activity is primarily on the Old Market site.

As has been voiced on other occasions and in various forums, we already feel that the Cathedral is significantly disadvantaged by the lack of local affordable parking within a short walking distance as

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the focus over recent years has appeared to be to support the new development and the Courtyard. Indeed, I have attended meetings where the importance of suitable parking for the Courtyard has been used as a case for focusing it in that area, ignoring the fact that the Cathedral regularly welcomes congregations and audiences far in excess of the Courtyard but which is apparently not factored into any strategic document that has been tabled.

We regularly receive anecdotal evidence of visitors who, having street parked or used one of the few local public car parks, have to return to their vehicles after the permitted time having wished that they had been allowed longer to visit. Expensive short-term parking, with long no-return periods, will further prevent people from increasing the length of their stay to the city and their knock-on spend.

Over the past year, we have also been working on a marketing and tourism plan to increase the profile of our music as part of a tourism package of a 'year-long music festival', building on the profile of the Three Choirs Festival and the high musical reputation that the Cathedral currently has. In addition to increasing our own footfall, we anticipate that such a programme would support the policy of increasing the average stay length for local accommodation providers, with overnight guests being known to have significantly higher spends than day visitors. We believe the imposition of a charge which is in place post-5 pm will have a significant impact on discouraging people to visit the city centre ahead of Evensong (sung at 5.30 pm), as well as discouraging them visiting in the first instance.

The installation of the SAS Memorial, which as far as we are aware has been welcomed by the Local Authority, will have the potential to significantly increase footfall to the Cathedral quarter. However, the high cost of short-term parking, and the lack of other significant parking provision (noted below) will limit this potential and the potential to encourage visitors to remain in the city and maximise their economic impact.

Considerable work needs to be done to enable Castle Street to function more effectively for residents, our deliveries and those legitimately parking on site, and those who use this access route for other reasons. However, this will not be achieved until there is a comprehensive and full traffic management plan implemented between Hereford Cathedral School and the Local Authority, where School parents are the main cause for creating chaos in the street.

We note the change of wording from 'coach' to 'bus' but, after a telephone call to your office, I understand that this is purely a wording technicality and is not changing how and who might use the space. If it should, I would appreciate if you would notify me in order that we might consider any impact.

We also use this opportunity, if we might, to commend to the transport team to look at the coach provision for the city and the difficulties we and many other have through the lack of designated and suitable parking

The Cathedral is acknowledged by all to be the principal tourist attraction, not only for the city and county, but also the wider region. These proposals will significantly weaken our ability to provide this economic and cultural support to the county, while also weakening our own financial position. We strongly urge Balfour Beatty and Herefordshire Council to review this policy.

d) Director of Finance and Resources, The Cathedral School

Dear Ms Cole,

I am responding to the consultation regarding the proposed changes to parking in Hereford's Historic core in 2017.

I need to start with a complaint that the School did not receive any direct communication from Balfour Beatty regarding this consultation, nor were we included in the previous consultations. I find that very disappointing considering the size and location of the school, its community and the likely impact of the proposed changes to our staff, pupils, parents and visitors.

The school is firmly in the centre of the proposed changes, situated as it is in Castle St and Church St. The school employs 190 staff and has 750 day pupils. We are also a major city centre business with a turnover in excess of £8.5m. We therefore consider ourselves to be a major part of the local community, and its transport issues, all the more reason that we are disappointed not to have been consulted directly or previously.

Our School travel surveys reveal that staff and pupils travel from all parts of the county and beyond, often beyond the reach or outside the timetables of sparse public transport. Very few live within walking distance and even fewer risk the city traffic to cycle to school. Given the distribution of our community, the limited number who walk, cycle or travel on public transport we assess that there are about 700 pupils and staff who travel in to school by private car each morning and 765 from school each evening, both concentrated into very short periods of time.

The school operates 11 minibus routes in the morning that bring in 145 children and 7 buses in the evening that return 75 children. These buses drop off at Castle St in the morning but most of them use Broad St to pick up the pupils in the afternoon to avoid the congestion of the main route around the city centre. 50 pupils travel by train, approximately 50 more walk or cycle. The remainder drive; parents tend to use one of three main areas for the daily school run: Castle St, St Owen St and Broad St. Some parents are able to drop and go but many pupils, particularly in the Junior School, need to be accompanied to and from the school gate by their parents.

The School cautiously supports the proposal to reduce the waiting time on Castle St from 2 hours, however we are concerned that the inevitable additional number of vehicle movements per hour may present an additional risk to pupils who have to routinely cross Castle St during the

school day, for example to get to the Junior School assembly hall or the dining room. We would like reassurance that the authority has properly considered the safety implications of the potential increase in traffic flow as a consequence of the proposal to reduce the waiting period to 30 minutes.

We object to the proposal to provide zones of Permit Holder Only Parking in Castle St. In our opinion the proposal allocates a disproportionate number of reserved spaces to relatively few residents who have knowingly bought city centre townhouses with limited or no dedicated parking. The school's preferred solution would be to retain the current system of limited waiting, except permit holders, along the entire length of Castle St.

The School is concerned at the proposals to introduce a 2 hour pay and display scheme on St Owen St and Broad St. Not about the principle of pay and display but that the frequency and turnover of these spaces will be reduced, effectively forcing parents and other city centre visitors to circulate already congested streets looking for spaces, thereby increasing congestion further. We can see no plans to provide any increase in short term off-street parking capacity in that part of the City to compensate for the loss of the current 30 minute, short stay spaces.

The school disagrees with the underpinning assumption that there are *other alternative or sustainable options such as bus travel or cycling*, or that there are sufficient off-street car parks available within the area of the historic core. Some of these proposals are premature and in our opinion are more likely to increase congestion than reduce it, to the detriment of the city, the residents and the School.

The School further disagrees that the proposal will meet the **Statement of Reasons** in the following areas:

- We do not believe that the proposals *will improve traffic flows and allow greater access for sustainable transport modes*, rather we believe that Broad St in particular will become more susceptible to short term double parking or illegal use of the bus and loading bays which will increase congestion and make it more difficult for larger vehicles to pass unimpeded or for school buses to safely pick up pupils.
- We believe that there will be an increased traffic flow in Castle St which will put the safety of pupils at risk, contrary to the *aspiration of avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising (i.e. to improve safety)*.
- We do not accept the statement *In authorising the advertisement of these proposals the Council has given consideration to its duty under s122 of the Road Traffic Regulation Act 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway (while having regard to the matters specified in s122 subsection (2) of that act)*. We do not believe that the Council has adequately recognised the particular risks to pupils by increasing traffic flows along Castle St, which is the likely consequence of shorter permitted parking periods.

The School trusts that Balfour Beatty will deal with our complaint and concerns raised about the proposals appropriately.

e) Chairman, Hereford Business Improvement District

Further to discussions with representatives from Herefordshire Council, we have set out below our formal response to the On-Street Parking Consultation for Hereford City Centre. In drafting this response, we have taken into consideration opinions from BID board members, shopping centre managers, BID member businesses, lessons from other destinations, discussions with Council officers, and the newly available data on footfall and dwell times in the affected areas.

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Overall, we would welcome a revision of the current parking arrangement in the areas included in the consultation in order to create an appropriate churn rate of parked cars, hence giving users the confidence that they will be able to find a space to pop into local businesses. Undoubtedly the most pro-business way to achieve this would be without the introduction of charges, so as to encourage the maximum number of users to each area. It almost doesn't need to be said that the opinion of businesses is strongly against the introduction of charges, however we recognise that this is not likely to satisfy the Council's objective.

Having consulted with businesses in the 2 main areas of the city affected, it has become apparent that there are some very specific and localised needs with regard to parking, on which the businesses depend. Both areas, for different reasons, are dependent on a high churn rate of parked cars, and it is probably the case that the nature of the businesses in each area has evolved over the last 20 years partly as a result of the immediate availability of 'pop in' parking;

- The St Owen Street area has opticians, doctors and chemists who have done well there because people can pull up and pop in to collect a prescription or pair of glasses. This end of town is also currently well served with off street parking for those who need to stay for longer (say for a doctor's appointment). The Geo Sense Footfall tracking system is showing that the average dwell time in this part of the city is currently 50 minutes.
- The King Street area is dominated by estate agents whose customers pop in to collect and drop off keys. This area of the city needs to be very carefully considered as the nature of estate agent businesses is now changing nationwide, and creation of unfavourable conditions could accelerate an exodus of these businesses who will more than likely not need high street premises in the future. King Street is currently very close to fully occupied and it would be a great shame to see this area of the town lose its purpose and identity without a plan in place for future use. The Geo Sense Footfall tracking system is showing that the average dwell time in King Street is currently 38 minutes and Broad Street 55 minutes.

It is vital that the parking proposals are appropriately matched to the character of each area, and type of use that people need, irrespective of having to pay or not. The specific points outlined below have been made in light of these needs;

- Initial free parking period of 10 or 15 minutes before charging starts; o We appreciate this is difficult in law, but where there is a will there is always a way. This is vital to protect the current character and use of each area for reason outlined above.

We have further considered the discussions around it being permissible for any vehicle to use Loading bays (say for a car driver dropping off keys to an estate agent in Kings Street). However, there are very limited loading bay spaces in some areas where this is likely to be a considerable issue. Also, this is not an easy message to convey to the general public, and we believe this is likely to lead to grey areas, and make enforcement more difficult. The powerful 'open for business' message of parking for free for a set time should not be underestimated.

- In the current proposals, the minimum amount of time that can be paid for is 30 minutes, clearly this is far too long for a huge number of the users. This is another reason we would like to see 10 or 15 minutes free, and if (and only if) this cannot be granted, then a shorter (and probably therefore very cheap) first charging period would be appropriate (again 10 or 15 minutes).
- Shorten the overall parking time allowed;

In both areas, the 2-hour proposal is a considerable extension of current limits, and risks damaging the churn rate, because users will be able to park on the street for a similar fee to using a car park. It is our belief that those requiring more than a 1 hour stay should be using the available car parks, not blocking on street spaces needed for quick jobs that consumers come into the city for.

- In early discussions, we had voiced that it may be appropriate for a longer stay to be possible in the St Owens Street area than the King Street Area. However, on balance we feel one city wide structure creates a clarity of message that works better for the consumers.
- The considerable change in maximum stay length (in some parts from 30 minutes to 2 hours), may have a more detrimental effect on the areas under review, than the introduction of charges, and therefore needs very careful revisiting.

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- Business permits

Businesses in both areas have asked about the availability of permits for the businesses, that could be transferred between vehicles, and which they accept they would need to pay for. These would still need to be subject to maximum length of stay to avoid spaces being blocked, but would allow businesses to continue to operate in a similar way to their current practices.

- Street scape opportunity

As a final thought, the implementation of the proposal is going to require updating of signage and implementation of meters. This provides an opportunity to enhance the street scape in certain areas. Broad street for instance has unsightly poles at regular intervals that only hold very small parking signs. Locating these on buildings and removal of the poles (as has been implemented in Widemarsh Street), could greatly enhance some of the affected streets scapes.

We would welcome the opportunity to meet for further discussion of this and other feedback received, when the proposals are being finalised. The proposals are not going to be popular, and local media will undoubtedly create negative headlines from the implementation that damage visitor numbers to the city. Above all we must ensure that the recent upwards surge the City Centre has experienced is continued, much of which is down to perception, hence the need for positive messages.

In Summary, whilst we are against the implementation of on street parking charges, we appreciate that implementation is almost certain to go ahead. It is therefore vital to make sure that the structure of the charges is as suitable as possible to the areas affected. On this basis we believe that the maximum length of stay and charges for the first 15 minutes are the most important parts of the proposal to revisit.