



## **ACS Submission: The right to challenge parking policies**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Government's discussion paper on the right to challenge parking policies. ACS represents 33,500 local shops across the country including the Co-operative Group, Nisa, Costcutter, Spar UK and thousands of independent retailers. Our members trade in a range of rural (38%) suburban (24%) and urban (38%)<sup>1</sup> locations and parking provision and enforcement is important for all of these stores.

We welcome the action that the Government has already taken in ensuring that local residents and businesses are able to challenge their local authorities parking strategies and practices. The convenience sector is dependent on accessibility by car, with 39% of customers stating that they drive to stores<sup>2</sup>. There must therefore be a well-developed long-term parking strategy which successfully engages with residents and businesses.

### **Parking Review Mechanism**

ACS supports the proposal for introducing a petition based review mechanism to assess parking provisions in local areas. If a proper consultation is undertaken with residents and businesses, parking measures that are detrimental should be avoided. Convenience stores are highly dependent on passing trade and the availability of short-term parking spaces. Enforcement is therefore needed to ensure free short-term parking does not hinder this trade. It is often the case that local authorities fail to consider this business impact when outlining parking restrictions in local areas. As only 54% of people live within one quarter of a mile to a convenience store<sup>3</sup>, trade is strongly affected by parking accessibility.

Including minimum requirements for petition signatories would ensure that any challenges are supported by residents and/or businesses. We would welcome a minimum of 50 signatures as a figure to trigger a petition. Local authorities should also provide guidance on the minimum number of respondents needed to trigger a petition, taking into consideration problems associated with population density and problems in specific but small areas.

Defining a local business as those registered to pay business rates in the area irrespective of any business rate discounts is particularly beneficial to convenience retailers, many of whom receive such discounts on their rates. Those able to petition must include the business service area and those who support business through passing trade. Local authorities should therefore be flexible in their definitions of 'minimum' when designing a formal mechanism for petition.

Local authorities should be provided with sufficient information to understand what policy aspects are being challenged, as outlined in the discussion paper. Providing a template petition for business to use would make it easier for both those who wish to challenge local

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<sup>1</sup> ACS Local Shop Report 2014

<sup>2</sup> ACS Local Shop Report 2014

<sup>3</sup> ACS Local Shop Report 2014

authorities' parking decisions to outline their issues, and for local authorities when considering petitions. Publication of the review, challenges to policies and details of petitions would ensure that authorities are appropriately held to account by petition signatories, and ACS welcomes entrenching these measures in legislation.

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