

ACS Submission: Parking Reform: Tackling Unfair Practices

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Government's discussion paper on parking reform and tackling unfair practices. 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%)¹ 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 local authorities parking strategies and practices. The convenience sector is dependent on accessibility by car, with 39% of customers stating that they drive to stores¹ and 28% of retailers believe the reduction in car parking charges in local car parks should be a priority for local Government to support local shops². Parking is an extremely important issue for small shops and must therefore be a well-developed long-term parking strategy which successfully engages with residents and businesses.

- 1. Do you think there are problems with how parking on private or public land is regulated, or the behaviour of private parking companies?**
- 2. If you answered Yes to Question 1, what problems do you think there are with parking on private land, or the practices of parking control companies managing parking on private or public land?**
- 3. If you answered Yes to Question 1, what steps do you think the Government should take to rectify these problems?**

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 is available, and that motorists do not stay too long in parking spaces. However, overly strict parking enforcement can deter shoppers from using local shops, with out-of-town sites offering their own car parks sometimes viewed as safer.

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 store¹, trade is strongly affected by parking accessibility. ACS recommends that the Government continues to support small businesses on the high street by ensuring that parking enforcement is proportionate.

¹ [ACS Local Shop Report 2014](#)

² [ACS Community Barometer 2014](#)

4. Are you able to offer any evidence to support a case for change, or examples of best practice?

ACS chairs the Future High Streets Forum's policy group tasked with identifying areas of policy where the Government could take further action. Parking is one of the key areas of activity that we have made recommendations to Government on. ACS worked with DCLG and the Association of Town and City Management to produce 'In Town Parking Provision: Best Practice Guide', which has yet to be published.

5. Do you think there are other steps the Government could take to ensure that parking supports local shops and high streets?

6. If you answered Yes to Q5, what steps do you think the Government should take to help support local shops and high streets, for example by encouraging the provision of free and competitively priced parking spaces?

ACS has the following recommendations for the Government:

1. To review and prepare new guidance on the financial regulation of parking to clarify hypothecated use of income from on-street and off-street fees and fines; neutralise any differences in the way the rating system is applied to in-town and out-of-town car parks; and apply the concept of 'connected value' between parking and other commercial interests
2. To establish a voluntary, national system for benchmarking of car park provision in towns using key performance indicators covering quality, quantity and cost to facilitate local resolution of car parking issues between communities, business and councils.
3. To enable greater responsiveness from public parking providers; review the consultation procedure for public bodies wanting to alter car parking charges to ensure it encourages flexibility and the take up of new technology and modern payment methods.

7. Should there be an obligation for local authorities to offer the ability to pay for parking by cash within a reasonable distance of where they have parking (for example via ticket machines or via local shops)?

We would support convenient means of parking being made available to motorists: however, we would urge caution in adding new tactical obligations for local authorities and would favour councils using their resources to devise and implement effective parking strategies.

8. Do you have any examples demonstrating best practice approaches in the UK or abroad?

9. Do you have any best practice suggestions for councils to follow?

Examples of best practice are included in the attached guidance. ACS would be happy to arrange a meeting between officials and relevant associations.

For further information on this submission please contact Julie Byers at Julie.Byers@acs.org.uk or call 01252 533008.