

12th December 2023

Director of Legal & Democratic Services
County Hall,
Topsham Road,
Exeter EX2 4QD

Dear Sir

RE: Braunton Pay and Display Proposals
reference imr/DEV001/631 | website reference 6049

We object to this proposal as there is no evidence to support the need for it.

The statistics provided by DCC for the past 12 months clearly show that the numbers of infringements across the Braunton area are significantly lower than the other areas that are being targeted as can be seen in the following table:

| COMMUNITIES | TOTAL PCN |
|-------------|-----------|
| Braunton | 171 |
| Crediton | 806 |
| Dartmouth | 1839 |
| Honiton | 667 |
| Okehampton | 590 |
| Salcombe | 945 |
| Sidmouth | 779 |
| Tavistock | 1173 |

Source: DCC November 2023

However following an FOI request to DCC in July 2023 it has been established that the numbers for infringement on Exeter Road is substantially lower again. The FOI data provided by DCC for Exeter Road from August 2022 to July 2023 show only 28 infringements of parking for longer than the permitted period.

In response to the question "How many letters or complaints have you received from residents and businesses in Braunton that people are overparking along this section of the A361 in the past 5 years (by year)", DCC stated that:

"Our Civil Parking Enforcement Team, has received zero complaints relating to overparking on the A361 in the last five years. Our Customer Relations Team have searched for the term

"A361" resulting in 33 complaints in the last five years, but none of these related to overparking."

Given these statistics DCC have no valid grounds for introducing the proposed scheme for pay and display parking. It certainly refutes that there is a lack of reasonable access to premises along Exeter Road

There is no detail in respect of pay machines – how many and where they will be located. This raises a concern in respect of individuals with limited mobility.

The scheme is also proposing the loss of at least one disabled parking space and that the proposed disabled parking provision is limited to 6.6m which appears to be making an assumption that all blue badge vehicles are small.

We also note that the proposal increases the size of the taxi rank. The reason for this increase is not explained by DCC. We are aware that our County Councillor suggested that better use of this space would be a loading bay. We would support this view, although an increase in provision for blue badge vehicles would be a better option.

In respect of the proposed Schedule Part 1 changes in Caen Street and The Square Braunton it is difficult to interpret exactly what is being proposed as only measurements are provided and there is no street plan to indicate what is intended.

Since Love Braunton first became aware of this proposal in June 2023 we have consistently asked DCC Highways for evidence that supports their reasons for including Braunton in their overall proposal. None has been forthcoming. Nor does it appear that any evidence was submitted to and considered by Devon CC Cabinet in November 2022 when they approved the Scheme. A copy of this correspondence is attached to this objection.

Overall this is a poorly evidenced proposal by DCC Highways and should be withdrawn in respect of Braunton particularly that part which concerns Exeter Road.

Love Braunton

Attachement 1 – email to Braunton Parish Council Clerk

Attachement 2 – correspondence between Love Braunton and DCC

Cc Braunton Parish Council
Cllr Pru Maskell

ATTACHMENT 1:

E mail to Braunton Parish Council Clerk Mrs Tracey Lovell Cc Cllr Pru Maskell – 28th
November 2023

Dear Tracey

Thank you for taking this matter up on behalf of Love Braunton at your meeting with DCC Highways on 23rd November 2023. The outcome is disappointing but not unexpected as we believe that DCC has no evidence of need for this scheme in Braunton village. They certainly couldn't promote the DCC data we obtained via a FOI.

This FOI submitted by one of our members in September 2023 shows that only 170 parking tickets had been issued in the past 5 years and that DCC's Civil Parking Enforcement Team, had received zero complaints relating to overparking on the A361 in the last five years, whilst their Customer Relations Team only had 33 complaints in the last five years, but none of these related to overparking.

We are also concerned about the lack of communication by DCC with the Parish Council, its residents and elected representatives on a proposal that has potentially an impact on our high street businesses.

Looking back at publicly available DCC documentation there has clearly been no detailed analysis or evidence to support the proposal made in November 2022 and the Impact Assessment approved by the Scrutiny Committee (copy of IA and Scrutiny Committee minutes attached) is a very poor example of robust consideration and review.

It is noted that a Councillor on the Scrutiny Committee is an elected representative at both County and District level, but it seems that details of this proposal were not shared with their fellow councillors who represent Braunton at local government level.

The outcome of this process to date is that the community will have a scheme imposed on them based on no evidence or meaningful consultation with residents or their representatives.

DCC are now putting this proposal out to public consultation because they have to. It is a tick box exercise that does nothing to reduce public cynicism in local government - both at county and district levels.

Thank you again for raising DCC's lack of response to our enquiries with them.

Kind regards,
Love Braunton

ATTACHMENT 2: Email exchange with DCC between 22nd June 2023 to 19th September 2023

From: Love Braunton <connect@lovebraunton.org>
Sent: 19 September 2023 13:14
To: Christopher Rook <christopher.rook@devon.gov.uk>
Cc: Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>; Meg Booth <meg.booth@devon.gov.uk>; Tracey Lovell <tracey@brauntonparishcouncil.gov.uk>
Subject: Re: Proposed On Street Parking Scheme for Braunton

Dear Mr Rook

We have not had a response to our mail to you dated 22nd July 2023 which requested the evidence that DCC had to support the scheme being proposed.

It may be that in the two months since our request for evidence you are now in a position to provide data that supports the proposed scheme.

However we are also aware, following Braunton Parish Council meeting on the 12th September, that your intention is to go out for public consultation despite the lack of evidence as to why the scheme is being proposed.

So we ask again:

Do you have evidence that supports the scheme?

If yes please provide it

If no why is this scheme being advanced?

A prompt response would now be appreciated.

Kind regards,
Love Braunton

From: Love Braunton <connect@lovebraunton.org>
Sent: Saturday, July 22, 2023 3:44 PM
To: Christopher Rook <christopher.rook@devon.gov.uk>
Cc: Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>; Meg Booth <meg.booth@devon.gov.uk>; Tracey Lovell <tracey@brauntonparishcouncil.gov.uk>
Subject: Re: Proposed On Street Parking Scheme for Braunton

Dear Mr Rook

Thank you for your mail response 3rd July to our letter to Ms Booth dated 21st June.

As advised in our acknowledgement of your mail, we have now considered your response which raises the following concerns.

Whilst you answered our questions in general terms there is a lack of evidence as to why Highways and the Economy team have identified Braunton as requiring an on street parking scheme.

The traffic congestion referred to in response to question 4 is not to do with parking facilities but more to do with the geographic location of Braunton village on the road network and the documented increase in vehicle movements.

There appears to be no data to illustrate that the current parking arrangements are not already facilitating the short stay/high turnover in the high street locations which you claim is the objective of your proposal. Also current the arrangements do not incur the cost of introducing and administering a Pay and Display scheme.

We note that this proposal was put before DCC Cabinet on 9th November 2022 who approved it and an allocated budget of £250K. Not an insubstantial amount for a proposal where no decision has been made, costs identified or benefits to be realised as you state.

It would be helpful if the evidence upon which the proposal was made is shared with residents and businesses who are likely to be impacted by such a scheme so that they are better informed ahead of an intended public consultation.

In respect of the monies paid to the Parish Council your response is in general terms and lacks specifics for monies paid to the Parish for cutting road splays and there is no indication of the value of subsidy required for the 303.

We look forward to hearing further from you.

Kind regards,
Love Braunton

From: Christopher Rook <christopher.rook@devon.gov.uk>
Sent: 03 July 2023 16:26
To: Love Braunton <connect@lovebraunton.org>
Cc: Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>; Meg Booth <meg.booth@devon.gov.uk>
Subject: RE: Proposed On Street Parking Scheme for Braunton

Dear Love Braunton,
Further to your letter dated 21st June, I understand your interest in the development of proposals for parking management in communities around Devon, including Braunton. I apologise for the delay in response.
To address your questions:

1. We have not undertaken public consultation as no decisions have yet been made. We met with local County Councillors including Councillor Pru Maskell on the 12th June to discuss potential schemes and have offered to come to each community and meet with the County Councillor and key representative in mid July to discuss further.

Once a scheme has been finalised this will be Advertised for public consultation, responses received through that process will be considered when deciding whether or not to proceed with proposals.

2. There has been no decision on where or when meters will be installed in any community.

3. There has been no decision on the extent of the scheme for any community, therefore no costs can be provided for any specific scheme. As reported to the 9th November Cabinet meeting an overall budget of £250,000 has been allocated.

4. The purpose of these traffic management schemes is not for the generation of revenue. As Explained in the report to 9th November Cabinet the aim is to assist in managing parking stock effectively, to minimise congestion and assist in ensuring the right parking opportunities are available to support town centres. Whilst a free 30 minute period will be provided to encourage turnover, it is likely that the schemes will be self financing, any surplus will be returned to the On Street Parking account (OSP).

5. The first call on any surplus returned to the OSP income is to support the parking enforcement service. Any further surplus can then fund other areas of transport and traffic management (as prescribed by legislation).

The account provides 60% of all bus subsidies provided by Devon County Council contributing £3.368m per annum, in 23/24.

The account also contributes £1.7m per annum to cyclic maintenance, including funding 90% of all costs relating to grass cutting for verges and visibility splays. This may be undertaken by our own contractor or through the Town Council with funding provided by DCC and includes verges and visibility splays both in central urban areas and surrounding rural areas.

There is currently no hypothecation of monies from the OSP, many communities are benefitting from surplus derived in other parts of the County.

6. Braunton receives 4 bus services (21, 21A, 21C and 303), it is the 303 (serving Woolacombe – Braunton – Barnstaple with 5 trips per day) that is supported by the OSP.

7. Proposals for the current review of parking management in our communities were discussed with colleagues in Economy. It was agreed that busier and less deprived communities will be prioritised and consideration will be given to the Deprivation Index for that area. Retail vacancy rates will be low (below national average), and not in significant decline. These locations are more likely to have more traffic and footfall needing improved management of traffic and parking.

A free parking period (30 minutes) will be provided where appropriate to encourage shorter stays, high turnover and improve availability of parking opportunities in high street locations. When considering if Pay & Display works for communities, there is no definitive way of measuring the economic performance of a community now or in the future. There are no clear findings nationally or detailed studies; it is fair to say that narrative is varied and

inconclusive. There has to date been no conclusive evidence on the correlation with economic performance of a community.

What we do know is that the availability of parking is important and in general that would be at the top of the hierarchy of needs for a visit; first parking must be available and conveniently located, the next consideration would be cost. Anecdotally, a casual observer would not find significant difference in occupancy of limited waiting or P&D bays in a high street setting.

I hope the above is of assistance.

Best regards,

Chris Rook
Traffic Management Team Manager

Traffic Management Team
Web site: [http:// www.devon.gov.uk](http://www.devon.gov.uk)
Disclaimer: <http://www.devon.gov.uk/email.shtml>

From: Helen Stevens <Helen.Stevens@devon.gov.uk> On Behalf Of Meg Booth
Sent: 03 July 2023 13:00
To: Love Braunton <connect@lovebraunton.org>
Cc: Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>
Subject: RE: Proposed On Street Parking Scheme for Braunton

Dear team

As advised, I shared your email with the appropriate manager for their review and response.

I think they were on leave at the time, and have returned to work this morning, so I am sure they will be in touch as they catch up on their work.

With kind regards,
Helen

Helen Stevens
Executive PA to
Meg Booth (Director of Climate Change, Environment and Transport)
Cllr Andrea Davis (Cabinet Member for Climate Change, Environment and Transport)
Cllr Stuart Hughes (Cabinet member for Highway Management)

Devon County Council
Transformation & Business Services
Room 126a, County Hall, Topsham Road, Exeter, EX2 4QD
Tel: 01392 381144
Pronouns : She/Her

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Please note that I work flexibly. I'm emailing at this time because it works for me. I don't expect you to read, take action or respond to this email outside your normal working hours.

From: Love Braunton <connect@lovebraunton.org>
Sent: 03 July 2023 12:25
To: Meg Booth <meg.booth@devon.gov.uk>
Cc: Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>; tracey <tracey@brauntonparishcouncil.gov.uk>
Subject: Re: Proposed On Street Parking Scheme for Braunton

Dear Madam

We have not received your detailed response to our email to you dated 22nd June 2023. Please advise when this will be provided.

Kind regards,
Love Braunton

From: Helen Stevens <Helen.Stevens@devon.gov.uk> on behalf of Meg Booth <meg.booth@devon.gov.uk>
Sent: 22 June 2023 09:47
To: Love Braunton <connect@lovebraunton.org>
Subject: RE: Proposed On Street Parking Scheme for Braunton

Good morning

I can confirm receipt of your email, which I have shared with the appropriate manager for their review and response.

With kind regards,
Helen

Helen Stevens
Executive PA to
Meg Booth (Director of Climate Change, Environment and Transport)
Cllr Andrea Davis (Cabinet Member for Climate Change, Environment and Transport)
Cllr Stuart Hughes (Cabinet member for Highway Management)

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From: Love Braunton <connect@lovebraunton.org>
Sent: 22 June 2023 07:50
To: Meg Booth <meg.booth@devon.gov.uk>
Cc: tracey <tracey@brauntonparishcouncil.gov.uk>; Councillor Pru Maskell <Pru.Maskell@devon.gov.uk>
Subject: Proposed On Street Parking Scheme for Braunton

Dear Madam
The attached letter is for your attention.
We look forward to receiving your detailed response.

Kind regards,
Love Braunton



21st June 2023

Devon County Council
County Hall
Topsham Road
Exeter
Devon
EX2 4QD

ATTN: Ms Meg Booth - Director of Climate Change, Environment and Transport

Dear Madam
At the Parish Council meeting held 13th June 2023, it was reported by our Devon County Councillor that Braunton is one of nine areas across Devon to have a parking scheme imposed upon it.

Devon County Council (DCC) proposal will see parking charges introduced along the Exeter Road. The first 30 minutes would be free and then the first hour would be at a low rate. Subsequent hours would be a higher tariff to encourage drivers to use the car parks for long stay. DCC state that the "proposal would encourage a high turnover of cars and therefore footfall to the shops. Any revenue generated would be used to subsidise the Braunton Bus

services and also to contribute towards the cyclical grass cutting. Payment by cash, card or the parking app Ringo (without charges) would apply.”

It is not clear which bus service is being referred to and the cost of cutting verges is in the main covered by the Parish Council, although DCC make a contribution of £4.3k pa in respect of cutting highway splay verges.

From searches of DCC website it has been established that the review of parking management (including pay & display) in key communities was reported upon and recommendation of the scheme being implemented made to DCC Cabinet on 9th November 2022 by yourself – see links below.

<https://democracy.devon.gov.uk/ieListDocuments.aspx?CIId=133&MIId=4462&Ver=4>
(Item 238).

Prior to that report officers discussed proposals with Scrutiny Commissioning Liaison Members, those discussions were reported to Scrutiny on 22nd September 2022.
<https://democracy.devon.gov.uk/ieListDocuments.aspx?CIId=427&MIId=4486&Ver=4>
(Item 72).

At no time since September 2022 has there been any discussions or consultations with Parish representatives, businesses in the village or residents on proposals that are likely to have an impact.

Given the lack of detail in respect of the proposal for Braunton would you please advise:

1. Why there was no public consultation with residents
2. Where and when the meters will be installed on Exeter Road
3. The cost to implement and manage scheme for Braunton
4. Projected revenue to be generated in Braunton
5. How surplus will be apportioned between the subsidised Braunton’s bus service and its Parish Council
6. Which Braunton bus service is to be subsidised
7. What consideration has been given to the potential impact upon businesses within the village of Braunton

We look forward to receiving your detailed response to these questions.

Love Braunton

Cc Cllr Pru Maskell Devon County Council
Braunton Parish Council