

Joint Response to Draft Consultation Document circulated 7th July 2018 reflecting views of those unable to attend the Advisory Group meeting on 26th July.

revised 30.7.18

First, the Council needs to be thanked for offering the two options agreed at the last advisory group meeting.

Inevitably in a first draft though, the draft consultation document does not reflect the detail of what was agreed. Nor – no doubt again inevitably in a first draft - does it present the two options accurately or fairly.

A revised Draft Consultation Document has been prepared to try to deal with the problems which have been identified, which are listed below, in the order in which they emerge in the initial Draft Consultation Document issued on 7th July.

1. under Analysis of Options – possibility of new split in Zone J

given the repeated evidence, given by members of the Advisory Group, about the harm done by the displacement of parking caused by the existing split in Zone J, this is worrying.

it is important it is made clear that splitting Zone J – with the inevitable damage it would cause – must be seen as a last resort and one to be avoided if at all possible.

2. under Analysis of Options – second choices

there is a danger that respondents could be pressed into indicating a preference for a second option they actively do not want

it will be important that 'none' is offered as a choice of second option so that this risk can be avoided

3. under Consultation Options – options intended to balance varying demands

it is untrue to say the options offered are trying to 'balance the varying demands of residential, business, leisure and visitor parking in the area'.

both options have been developed to protect the legitimate demands of residents with cars, whose needs, the advisory group has accepted, must be given priority

residents without cars, local businesses and places of worship have different needs:

while option 2 *does* try to marry these needs with the primary objective of protecting residents with cars, option 1 does not.

making this point though would be prejudicial and it would be fairer to drop any reference to the options trying to balance varying demands.

4. under Option 1 – Shared-use parking

there is no mention of the important concession – important to those who support Option 1 – that whatever the hours chosen, residents’ visitors using the Resident Visitor Permit would be able to park free of charge throughout the new Zone after 5.0 pm on weekdays and throughout the weekend; nor that each household would be entitled to two Resident Visitor Permits.

this has been corrected in the revised draft consultation document

5. under Option 1 – Shared-use Parking – claim that shared bay schemes more ‘efficient’

it is both highly prejudicial and even untrue to suggest that shared bay schemes provide for the more *efficient use of road space*

the evidence suggests this is *exactly* what they do not do: they are a one size fits all solution which cannot deal with the complexity of present day parking demands, particularly in an area like Zone J/JJ, where, to maximise the efficient use of road space, each street needs a different pattern of provision.

in Zone J/JJ, such a scheme will only protect residents in some streets if they have long control hours, but this leaves many *unused* parking spaces in other streets: parking spaces which otherwise could be used for the benefit of our community

it is the absolute opposite of flexible provision and efficient use of road space.

this is also the view of parking officers in other boroughs we have contacted and also the view of the relevant section of the Department of Transport

this claim, which runs counter to the balance of evidence, must be removed.

6. under Option 1 – Shared-use Parking – choice of hours and days

it is important to point out that this was *not* what was agreed at the last Advisory Group meeting: which was that Option 1 should be the extension of Zone JJ hours (9.0 am to 9.0 pm, seven days a week) to Zone J.

those preparing this critique, although they represent the majority of the advisory group opposed to Option 1, support those who back Option 1 who say it would not provide the help that some residents need if it does *not* have the control hours 9.0 am to 9.0 pm, seven days a week: there is no point offering an option that would *not* meet the needs those residents who have suffered parking problems.

the choice of hours and days for the Shared-use bays under Option 1 has been removed

7. under Option 1 – Advantages – flexible efficient use of parking capacity for mixed demand

as in 4 above, this is prejudicial and likely to be untrue

it must be removed

8. under Option 1 – Advantages – greater parking capacity for local amenities

what this means is completely unclear: it is certainly not an advantage that Option 1 would provide easier parking for those going to QPR or Westfield; nor does it provide the sort of parking capacity requested by local businesses and places of worship.

it needs to be re-phrased or removed

9. under Option 1 – Advantages – less traffic circulation and pollution

it needs to be made clear that any reduction in traffic and pollution is questionable and if it arises, likely to be marginal: ideally, it would also be set against the damage to family life, local businesses and places of worship that Option 1 would cause.

this has been re-phrased so that the claim is accurate

10. under Option 1 – Advantages – fewer parking signs

given the chaotic street landscape from traffic calming, 20 mph speed limits and countless other purposes, the reference to 'fewer parking signs' is risible;

this has been removed from the revised draft consultation document

11. under Option 1 – Disadvantages

there are far more disadvantages to option 1 than those currently listed

this has been corrected in the revised draft consultation document

12. under Option 2 – Permit holder only and shared use parking

the current presentation of this Option is not what was agreed at the last meeting of the advisory group: this is that the Permit-only bays should be protected 24 hours a day, seven days a week.

this has been corrected in the revised draft consultation document

13. nor does the current presentation reflect the view of members of the advisory group supporting this option that more Permit-only bays should be situated near the Uxbridge Road, where parking for residents with cars is most difficult, and fewer further away, where it becomes easier.

this has been corrected in the revised draft consultation document

14. nor does the current presentation mention what was agreed at the last meeting of the advisory group that as a scheme, Option 2 would be reviewed after six months or a year and any weaknesses in its original design corrected: this is an essential element part of Option 2.

this has been corrected in the revised draft consultation document

15. under Option 2 – Permit holder only and shared use parking – small number of bays

it is quite untrue to suggest that anyone on the advisory group has requested, let alone agreed, that there should only be a 'small' number of permit only bays: it has always been made clear that the number of 'permit only bays' must be sufficient to provide reasonably easy parking for residents.

given that under Option 2, many residents will continue to park in Shared-use bays close to their homes, the number of Permit only bays in any street need not equal the number of permit holders there, but should reflect this. It should also reflect the level of parking stress in different streets, as identified by the last 'stress surveys'.

Perhaps, overall, the number of Permit only bays in each street should be around 50-60 per of permit holders in that street, with more such bays near the Uxbridge Road and in streets identified as suffering more parking stress.

it will also be essential that in the agreed review of the scheme after one year, any under or over provision of Permit-only bays should be corrected, so as to ensure the efficient use of available road space.

this has been corrected in the revised draft consultation document

16. under Option 2 – Permit holder only and shared use parking – better utilisation of space

once again, this claim is highly prejudicial and against the balance of evidence.

it has been removed from the revised draft consultation document

17. under Option 2 – Permit holder only and shared use parking – choice of hours and days

No member of the advisory group has ever requested that there should be a choice of hours or days with Option 2: indeed such a choice, while seeding confusion, would undermine the purpose of Option 2, which is to provide an effective balance between the legitimate needs of residents with cars and the varied needs of others.

It was agreed at the last advisory group meeting that the Permit-only bays would be protected 24 hours, seven days a week – providing the protection that residents need

it was also requested, repeatedly, that the control hours for the Shared-use bays should be the current Zone J hours of 9.0 am to 5.0 pm five days a week – providing the help that everybody else needs.

it is important that Option 2 is presented in these terms

should these hours for the Shared-use bays prove insufficient, they can easily be increased when, as agreed at the last advisory group meeting, the scheme is reviewed.

the revised draft consultation document has been revised accordingly

Under Option 2 - Advantages

18. Option 2 enjoys many more advantages than those quoted in the draft consultation document.

the revised document corrects this

Under Option 2 – Disadvantages – less efficient use of on-street parking space

19. once again, the suggestion that Option 2 would lead to less efficient use of parking space is prejudicial and against the balance of evidence

it has been removed from the revised draft consultation document

20. suggesting Option 2 will concentrate parking demand into smaller shared parking areas is prejudicial;

Option 2 will lead, instead, to a significant increase in the usable parking space available to the great majority of visitors, who cannot afford to pay to park; there will also be absolutely no reduction in the number of bays available to residents or their visitors

the claim has been removed from the revised draft consultation document

21. suggesting that Option 2 will reduce parking available for local amenities is entirely misleading: it will reduce the amount of parking available for those attending QPR matches

or visiting Westfield, but it will substantially increase the parking available for local businesses and places of worship.

the claim has been removed from the revised draft consultation document

22. suggesting that Option 2 could be confusing for visitors is again prejudicial and untrue: the Department of Transport section responsible for parking schemes specifically deny this claim and cannot understand why it has been made: there are clear rules as to how 'Permit-only' and 'Shared-bays' must be signed which rule out any confusion:

the claim has been removed from the revised draft consultation document

23. suggesting that Option 2 would increase the number of parking signs is prejudicial; any difference would not be noticeable.

the claim has been removed from the revised draft consultation document

there are potential disadvantages to Option 2 and these have been listed.

24. under Option 1 in the questionnaire – control hours for Shared-use bays

an 8.0 am start to control hours has never been requested and no evidence has been presented by the advisory group that there is a parking problem at 8.0 am anywhere in Zone J; nor has a 10.0 pm finish to control hours ever been requested and no evidence presented by the advisory group to suggest any problem which could justify this further extension of control hours.

the 8.0 am start and 10.0 pm finish hours have been removed and replaced by a 9.0 am start and the choice of 5.0 pm, 7.0 pm or 9.0 pm for the finish of control hours.

Footnotes:

- Parking in Uxbridge Road and Goldhawk Road

The draft consultation document is right to describe, by implication, that the introduction of short stay parking bays near and on the Uxbridge and Goldhawk Roads is extremely complex and it is heartening to hear that the Council intends consulting with local businesses about this.

However, while the advisory group has generally welcomed the suggestion that inexpensive, short stay pay to park bays should be added on single yellow lines near and on the Uxbridge Road, there is a concern that should it lead to the displacement of parking from the Uxbridge Road to residential streets, it would have a hugely detrimental effect.

When the Council has finalised its thinking, it will be important it discusses its proposals with the Advisory group before implementing them.

- A third option

the Council is, of course, fully entitled to draw up its own preferred scheme for parking in Zone J/JJ and to offer this, as a third option, in the coming consultation: but unless it has discussed this with the advisory group and acquired its majority support, it would need to clearly label this third option as its own scheme, rather than one developed in consultation with the advisory group.