

## Notice of Concern

Comments below are in my role as Chair of Scrutiny

### Grounds

In the Budget papers that went to Council in March 2023 there was a proposal to undertake a review of the current parking policy, strategy, charges and fees. How the current strategy aligns with local and regional policy and to benchmark fees and charges. The document that went to Council clearly states that a consultation will be held within the financial year commencing April 2023, which would include charges as well as strategy. It also states that a level 2 IIA is required but that until “consultation and engagement with key stakeholders takes place, we are unable to provide a comprehensive assessment”. Since this statement was made the Council have changed their approach to the IIA and it is now one document. This does not though negate the comments in the Budget papers about engagement and consultation.

Therefore, an assumption can be made that both consultation and engagement would take place. The budget document does not state that this is purely the 28-day statutory consultation period for changes to traffic orders as the cabinet report proposes nor does the item in the Budget papers give an indication that this would include changes to free car parks.

The report going to cabinet on 14<sup>th</sup> November clearly states that the only engagement has been with cabinet members and not the key stakeholders discussed in the Budget paperwork. In light of the amount of increase in charges and the changes from free to paid parking, there should have been engagement prior to this report with ward councillors, bodies representing businesses and other organisations that would be affected by the changes as well as with residents of Kirklees. From Budget Council to November there should have been sufficient time for this to take place.

[Budget Book based on BUB v16.pdf \(kirklees.gov.uk\)](#)

There are no finance implications for the council given in the report. Therefore, it is not apparent what the costs are for the changes proposed or what revenue will be brought into the council and whether any proposed income levels to the council are achievable.

In the Parking Income and Expenditure statements that are published on the Council’s website the income from off-street and on-street parking in 21/22 totalled:

	22/23	21/22
On Street Parking Income	976,000	930,000
Off Street Parking Income	<u>1,947,000</u>	<u>1,613,000</u>
	2,923,000	2,543,000

This is listed with other income and is offset against expenditure on Parking. In both years there was a capital charge under expenditure which meant in one year there was a deficit of income over expenditure and in another a small surplus. Both these years are down from figures in 2019/20. (It needs to be noted that these figures are labelled as “Not Full Certified Accounts”.) In September parking charges were listed in a cabinet report under income generation in these difficult times for the Council and this November cabinet report highlights that charges have not increased for some considerable time. However, there is no mention of a review, as mentioned in the budget papers, and whether there are any other factors involved in the narrowing gap between income and expenditure on existing car parking charges.

Since my conversation with officers the report has been changed to give more detail on the powers of the local authority on setting charges. As in the amended report, it states that the council “must keep a separate account of their income and expenditure in respect of designated parking places including the parking charges and this aids decision making on revising charges.” Therefore, it is reasonable to expect that information on the Council’s finances would have been present in the report.

[v7 FINAL Cabinet Report Parking Tariffs.pdf \(kirklees.gov.uk\)](#)

[Open data sets | Kirklees Council](#)

There is no economic impact assessment for places where charges will increase or where it is proposed to change from free to paid parking in council car parks. There is no assessment of how centres may change or of what economic impact there may be on small retail as opposed to large retail whom, in some places, provide free parking. There does not appear to have been any work in assessing whether village and town centres in Kirklees can support changes proposed in this report.

Appendix 1 of the report gives draft Parking Service aims. This is not yet ready for decision and will be subject to scrutiny in February. These aims include setting parking charges at appropriate levels for the local area .... taking account of the economic viability of commercial centres and to monitor the impact of charging. Therefore, surely the impact of these changes on the economic viability of commercial centres should have been part of this cabinet report.

Under the consultation section of the cabinet report, it simply states that a statutory consultation report will be compiled and presented for consideration prior to implementation. This section does not give the timeline for any consultation or where the report for consideration will be taken. With other consultations running in the Council at this moment in time, this section should have made clear the committee that would make any decision on objections raised.

In Next Steps/Timelines section there are the items needed for implementation and presumably the publishing of the Parking Places Order under the 1984 legislation does encompass consultation and a decision on any objections, but this is again not clear.

The Officer recommendations do not include going out to consultation therefore where is the decision being taken to go out to statutory consultation?

There should be more transparency in the process, financial and economic implications.

#### Tried to resolve.

A discussion was held between me and the service director on the report. On one of the points the Director did say he would look to clarify the information given on consultation. At the time of writing this has not been changed.

I have also asked for information on the Impact Assessment, and a link to this document is now in the amended report.

Information asked for on finance has been provided which states that there has been an adjustment for the loss of the Queensgate parking spaces in Huddersfield but there remains a gap which the proposals are designed to close and add to. Income has been projected on operational knowledge, occupancy reviews, benchmarking and it is intended as part of implementation to monitor footfall as well as occupancy.

However, my concerns remain that there should have been engagement and an open and transparent review before a decision.

#### Preferred actions

This decision be paused until there is engagement across Kirklees and so that the viability and impact on centres can be assessed, an assessment carried out as to whether the Council will realise income projections, the Service Aims put in place and scrutiny of the proposals undertaken.