

## Report of the Estates Officer

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### **Subject: Review of PCNPA Car Park Season Ticket offer in advance of the 2023 Season**

#### **INTRODUCTION**

The Authority operates 14 no. charging car parks and from the start of the 2017 charging season we have offered the public 2 no. season ticket types. These season tickets are available to all with no qualifying criteria or limit on numbers issued. One ticket type is valid for use at any of our car parks whilst the other is limited to use at a single nominated location only.

The benefit of both types is the entitlement for a single motor vehicle displaying the season ticket to occupy a single parking space, conditional upon there being available capacity within the car park.

The current cost of a season ticket purchase is:

- Single nominated car park all season: £25 (unchanged since introduction in 2016)
- All car parks all season: £70 (unchanged since 2015)

In the years since our current season ticket offer was introduced it has been well received by the motoring public.

The season tickets are made available for purchase from the middle of January well in advance of the start of the charging season (15<sup>th</sup> March) and remain available for purchase throughout the charging season ending 7<sup>th</sup> November.

To the individual concerned, the cost/benefit which informs their own season ticket purchasing decision will be unique, albeit informed by the fact that we place no limitation on:

- the frequency of a single tickets use
- the duration of single tickets use
- the transferability of the ticket between users
- the transferability of the ticket between vehicles

This means that our season ticket offer is positioned to place no unreasonable constraints on the reasonable parking requirement of the reasonable motorist.

Whilst tickets can be purchased over the phone or in person at our Llanion HQ and Oriel Y Parc sites, the vast majority are ordered via our online web shop with the processing and dispatching of those orders being undertaken by our Llanion HQ based customer services

team. The total number of 2021 season tickets sold was approx. 1,750 whilst the 2022 season tickets sales exceeded 2,000.

The table below shows the timing and volume of ticket sales over the course of 2022 and illustrates that circa (68%) of all season ticket purchases are made either prior to the start of the charging season, or as an immediate response to it.

Period of Purchase during 2022	Approx Number of season tickets sold	Approx Percentage of Total Annual Sales during the period
In advance of charging season (15 <sup>th</sup> March)	890	44%
Start of charging season to end of March	480	24%
April	303	15%
May	164	8%
June	95	4%
July	57	3%
August	25	1.3%
September	13	0.6%
October through to end of season (7 <sup>th</sup> Nov)	2	0.1%

The table below illustrates the type and geographic spread of season ticket purchases during 2022.

Ticket Type	Approx Number of 2022 Season Tickets issued	Car Park Capacity
<b>All sites All season (£70)</b>	<b>475</b>	N/A
<b>Single site only All season (£25)</b>	(See below)	N/A
<b>Saundersfoot</b>	<b>470</b>	116
<b>Poppit Sands</b>	<b>341</b>	280
<b>Little Haven</b>	<b>176</b>	98
<b>Amroth</b>	<b>133</b>	94
<b>Freshwater East</b>	<b>122</b>	204
<b>OYP St Davids</b>	<b>65</b>	260
<b>West Angle</b>	<b>59</b>	165
<b>Newgale</b>	<b>49</b>	161
<b>Newport Sands</b>	<b>47</b>	163
<b>Solva</b>	<b>46</b>	106
<b>Penally</b>	<b>30</b>	35
<b>Broadhaven</b>	<b>22</b>	173
<b>Manorbier</b>	<b>16</b>	158
<b>Nolton Haven</b>	<b>19</b>	38

Our single site ticket represents approximately 75% of all sales with their demand typically fuelled by site specific location factors including:

- Off street domestic/holiday home parking provision
- Volume of business/commuter activity
- Regular (assumed to be at least once a week) leisure visits throughout the season
- Peak season visitor holiday parking

The continuing appeal of our season ticket offer reflects:

- Its ease and simplicity of purchase
- The convenience of use that it offers the motorist (not having to pay on each and every visit)
- Their flexibility of use (transferable between users and vehicles)
- Cost benefit per use compared with the 'pay as you go' parking charges which are presently:
  - up to 30 mins: Nil Charge
  - up to 1 hour; £1
  - up to 2 hours: £2
  - up to 3 hours: £3
  - All day: £5

Having reviewed the functionality, demand and distribution of our existing season ticket offer, the remainder of this paper seeks to identify a reasonable contemporary price point for that same offer.

Whilst we do not hold any data on the frequency of use of individual season tickets, we do know that:

- The majority are bought during the early months of the calendar year, giving opportunity for use across much or all of our 8 month charging season
- Available pay & display data shows that 2 hrs/£2 parking durations is the most frequently selected option
- The anecdotal evidence of our own charging car park team who visit our car parks on a daily basis is that:
  - Many vehicles displaying season tickets are present in our car parks on a very frequent basis, often daily
  - It is not uncommon for a permit displaying vehicle to be parked in excess of 2 hours
  - The use of permits to meet long stay parking requirements has become a visible characteristic at some of our car parks such as Saundersfoot.

Based on the above, and adopting a conservative estimate of usage for the average single site ticket of one parking session per week not exceeding 2 hours duration, the season ticket purchase cost of £25 is equivalent to 12.5 weeks of 'pay & display' parking cost. The duration of our charging season is 33 weeks.

The table below sets out parking permits which are made available by other car park operators within Pembrokeshire for purchase by the public and are broadly comparable to our own '£25 single site' or '£70 all site' ticket offers.

<b>Comparable Season ticket Permit Offers within Pembrokeshire</b>			
<b>Location/Operator</b>	<b>Season Ticket</b>	<b>Cost</b>	<b>Conditions/Comments</b>
<b>Pembrokeshire CC</b>	Single nominated Site only (March to October)	£125	Branded as 'The Puffin' and transferable between vehicles
	All Sites only (March to October)	£150	Branded as 'The Seagull' and transferable between vehicles
<b>Saundersfoot Harbour Commissioners</b>	Single Site ( Annual)	£118	Not transferable, nominated vehicle only
	Single Site Flexi ( Annual )	£284	Transferable between vehicles
<b>Coppit Hall Beach, Saundersfoot</b>	Single Site ( Annual)	£150	Not transferable, nominated vehicle only
<b>Whitesands Beach ( St David City Council)</b>	Single Site ( Annual)	£60*	* Cost to qualifying residents is £15

These comparables lend support to the argument that our season permits are currently under-priced at £25 & £70 respectively reflecting a cost benefit significantly in excess of reasonable expectations.

If we maintain our assumption of average usage as outlined above (i.e. up to 2 hours once a week), a 100% increase in the price of a single site season ticket from £25 up to £50 would equate to 75% of the comparable 'pay as you go' cost.

At a current price point of £70, our 'All sites' ticket is a popular offer reflecting approximately 1 in 4 of all permits sold. Increasing its price to £140 would maintain the existing cost/benefit ratio between single and all site tickets.

### **Financial, Risk & Compliance Considerations**

- The proposed increasing our season ticket price points does not require any variation of the Authority's existing Car Park Order
- The broadly accepted concept of a season ticket purchase (whether for rail travel, parking, sport's ground admission etc...) is that the price point should reflect an element of price discount compared to the 'pay as you go' alternative
- Comparison of our current season ticket and pay as you go rates indicates a significant degree of financial inequality in favour of permit holders to the detriment of pay as you go users
- The pricing differential between our 'single' and 'all sites' permits was most recently considered by a Members 'Task & Finish Group' in 2015 and subsequently endorsed by members at their NPA meeting in November 2016.

- Experience suggests that any change to the price point of our parking offer will result in vocal adverse responses from a minority of users, community action groups, democratically accountable representatives, and the media
- The following may be particularly sensitive to the proposed price increases:
  - Individuals that purchase season tickets to provide for their own domestic off street parking needs, despite a likely frequency of use that would suggest a very high level of resulting cost cost/benefit.
  - Regular users of the 4 no. car parks that saw parking charges introduced for the first time at the start of the 2021 season i.e Amroth, Penally, West Angle and Nolton Haven
- Addressing the adverse public reaction will be time consuming for officers;
- Any decision to increase our car park season ticket prices at this particular point in time should be considered against the current overarching 'cost of living crisis'
- To provide for an orderly introduction, any final decision to increase the 2023 season ticket prices needs to be made by the middle of December at the latest to ensure that season tickets can be printed at the new price and be available for advance purchase from January onwards.
- The vast majority of season ticket purchases are dispatched by post. To date that cost has been absorbed by the National Park at present postage rates of 78p ( standard 1st class) for orders up to the value of £70 and 'signed for' delivery at a cost of £2.18 for orders at or above the £70 threshold value. It is proposed that the threshold value is increased to £100 with postal costs being passed onto the customer.

## **Integrated Assessment Summary**

### **Process**

The Authority has carried out an impact assessment on this proposal. A summary of key impacts identified, and responses provided are outlined below. As part of this process the following evidence was considered:

- Relevant themes from consultation on the introduction of charging (Change to variation order) at Amroth, Nolton Haven, Penally and West Angle Bay and extension of charging period at Solva
- Data on Barriers to Access, Census 2021 available data and cost of living poverty data including information from
  - PCNPA Experiences for All Report (December 2021)
  - Landscape Review in England
  - Resolution Foundation – an intergeneration audit for the UK
  - Pembrokeshire Well-being Assessment 2022
  - Review of relevant Census 2021 Data (from current releases available)
  - JRF: UK poverty 2022

A meeting was held with CEO and Estates Officer to review impacts identified by Performance and Compliance Officer as part of the assessment and to consider their responses.

It is recognised that there are some data gaps and it is proposed that the Authority carries out wider data collection activities in 2023 to gain a better understanding of the profile of its car park users and how they utilise our car parks and car parking offer.

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## **Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes - Impacts and Response/ Mitigations**

### **Impact:**

Change in policy favours those on higher incomes who are more likely to be able to cover cost of % increase on the one-off payment for the two season ticket options. Those on lower incomes who benefit from current season ticket potentially will no longer be able to benefit from season tickets as they may struggle to afford paying % increase on one off payment for the season ticket options. As a result, they will have to use Pay as You Go alternative and won't benefit from the discount. Potential additional impacts on particular groups linked to intersectionality such as young people or single parent households. In particular those less likely to have a 'savings buffer' to cover unexpected or higher costs.

As a consequence, low-income households that use the season ticket as a means to access the Park frequently may no longer be able to benefit from recreational activities and health and well-being benefits in the Park. This could compound existing disparities in terms of low income households (including those who face additional barriers due to intersectionality factors) and their access to the outdoors compared to higher income households.

Commuters on low wages or experiencing in work poverty who use season tickets will face increase in cost, that they may struggle to meet, including potentially carers providing support in community that may utilise car parking facilities. It could make it difficult for people to take up employment opportunities in different areas of the Park, particularly seasonal summer jobs.

The proposal does not include an option around spreading payment – e.g. making multiple payments to cover cost in chunks rather than having to meet cost all in one go. It does not include any proposals around providing discounts for specific users. People excluded from other providers car park seasonal offers may also now be excluded from the PCNPA seasonal offer due to cost.

It may encourage displacement parking in unsuitable locations with associated health and safety and community relations issues due to people having no affordable alternative.

Residents on low incomes with no parking will face increase in cost, that they may struggle to meet.

Use of season ticket was identified within equality impact assessment in relation to variation of car parking order as a mitigating factor to address introduction of charges at some new sites – Nolton Haven, Amroth, West Angle and Penally. However, this offer is a universal benefit for all charging PCNPA car parks and was not specifically introduced for these sites.

Potential negative impact on both staff and Members on their well-being due to impact of any negative response from public and deterioration in community relations due to increase. This is likely to impact staff outside of car parking services who liaise with particular communities. Some staff have also indicated that car parking could potentially be a tool to assist people re cost of living and Authority needs to consider how the proposal impacts on its ongoing support for Pembrokeshire Public Services Board's Subgroup work on localised action to combat poverty across Pembrokeshire.

### **Response:**

Recognise that lower income households (taking account of additional intersectionality considerations and commuters in low waged work and experiencing in work poverty) who have cars and utilise our car parks are the group most likely to be at risk of negatively being affected by this change. In addition, also recognise that rurality of Park means that lower income households who are at risk or experiencing rural poverty will potentially need to use car to access employment/ services due to limited alternatives in terms of public transport. To mitigate the negative impact on this group and potential additional hardship for some car park users Officers will investigate the potential to work with other specialist organisations/ groups who already provide support for those experiencing hardship via referral services to distribute a set number of car parking tickets to eligible people. The nature of this offer will be dependent on wider discussions with relevant organisations and groups and feasibility considerations. This development of this scheme would align with wider activities relating to work of Pembrokeshire Public Services Board Subgroup looking at localised action to combat poverty across Pembrokeshire.

The Authority is not committed to providing parking for residents without parking spaces at their residence and does not provide a Residence parking option. However, residents on low-income meeting eligibility criteria could potentially benefit from above scheme.

The potential mitigating option of multiple payments for season parking ticket which could support lower income households struggling to meet a one-off payment has had to be ruled out as it is not operationally viable.

We will also seek to carry out wider data collection activities in 2023 to gain a better understanding of the profile of our car park users and how they utilise our car parks and car parking offer.

The recommendation proposes a 100% increase in the cost of Season Tickets, the season ticket would however remain the cheapest option for parking when compared with other similar providers in Pembrokeshire. Bringing our pricing more in line with other organisations. The full-face value cost of our 'All sites season ticket' offer has remained unchanged at £70 since 2015 and there has been no change in the cost of the £25 'single site season ticket' offer since its introduction back in 2016. As at 2017 additional 'user value' was introduced to both offers (with no price increase) by removing the pre-existing restriction on transferability between vehicles. The recommended increase in cost of

season car parking tickets will support the Authority to meet the increased costs it is facing in terms of managing services such as public rights of way network alongside cost of managing and maintaining car parks.

This change will not impact on the Authority's offer of up to 30 minutes of free parking (no return within 4 hours), extended to 1 hour for blue badge holders.

In terms of impact on staff, while any increase in cost is not likely to be popular, even if the proposed charges are agreed PCNPA's car parking Season Ticket option will still be the cheapest option when compared with similar local providers. Officers are working with communications team to proactively manage messaging and communication in terms of this change. The Authority will communicate that it has zero tolerance in terms of verbal or physical abuse directed at staff and additional support will be provided to relevant staff where needed, including provision of conflict management training if needed.

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## **Welsh Language – Impacts and Response/ Mitigations**

### **Impact:**

The Authority needs to ensure Welsh Language Standards are met in terms of any signage and communication around changes to season ticket pricing.

### **Response:**

All elements of this work will be delivered in accordance with the relevant Welsh language Standards.

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## **Section 6 Biodiversity Duty and Decarbonisation – Impacts and Response/ Mitigations**

### **Impact:**

May impact on access/ use of EV charging points in PCNPA car parks, in terms of those users who use seasonal tickets to offset costs relating to requirement to pay for parking when charging.

### **Response:**

This change will not impact on the Authority's offer of up to 30 minutes of free parking (no return within 4 hours), extended to 1 hour for blue badge holders. This offer can be utilised by those needing to use EV charging car parking spaces regularly in addition to taking up season ticket offer for location. We will seek to carry out wider data collection activities in 2023 to gain a better understanding of the profile of our car park users and how they utilise our car parks and car parking offer, including those who use EV charging facilities.



## **Consideration of 7 Well-being Goals for Wales and 5 Ways of Working under the Well-being of Future Generations (Wales) Act**

The majority of considerations correspond with impacts and responses already identified under Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes, Welsh Language and S6 Biodiversity Duty and Decarbonisation.

Additional considerations identified include:

Brings PCNPA's pricing approach more in line with other car parking providers who offer seasonal car parking offers in Pembrokeshire. To ensure consistency PCNPA adopts the same approach across all car parks.

PCNPA, in common with other public bodies, is facing potential financial deficits. Income generated from car park enables us to retain our investment in other transport options/ services such as the

- Coastal Bus Network
- providing transport to help people access a range of its own initiatives, particularly health and well-being and social inclusion initiatives through its mini-bus with pick up point in for example Haverfordwest.

Income generated also supports wider work in terms of maintaining the rights of way network and nature recovery activities alongside ensuring resilience of car parking service and ongoing maintenance of this provision. Even with the charges proposed the Authority would provide the lowest cost option for car parking Season tickets in Pembrokeshire.

The Authority could consider making a commitment to not increase cost after this change in relation to season tickets for set period of time.

No specific consultation has been carried out with public as regards this proposal or with specific groups of car park users, communities and businesses affected. However, information from consultation on variation of Car Parking Order, PCNPA Experiences for All report and Pembrokeshire Wellbeing Assessment were considered. We will seek to carry out wider data collection activities in 2023 to gain a better understanding of the profile of our car park users and how they utilise our car parks and car parking offer. As part of this we will include wider survey work with local businesses/ communities where PCNPA car parks are located.

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### **RECCOMENDATION:**

**The ongoing operational work to prepare for the 2023 charging car park season requires a final decision on the 2023 Season ticket price points to be made at today's meeting to ensure that season tickets are available for pre-season purchases by the public from mid-January onwards. Members are asked to approve an increased price point of £50 & £140 respectively and the passing on of postal costs to the purchaser.**