

Response from Brighton Dogwatch to Brighton & Hove (Stanmer Park) Various Restrictions and Off-Road Parking Order 202* (Ref: TRO-2-2020)

Brighton Dogwatch is a local constituted group who primarily run a Facebook page helping reunite lost and stolen dogs in Brighton/Hove and around Sussex. We currently have over twelve thousand followers who help us. With their help and shares, our posts for lost dogs often reach fifty to a hundred thousand people and sometimes many more. We also find ways to help local dogs and their humans. This includes giving local information/advice, promoting responsible dog ownership and raising money through memberships and donations to support the less fortunate dogs in our community.

We are concerned about the proposals for car parking charges at Stanmer Park as this will discourage dog walkers from using this fantastic site. We summarise these concerns below with more detail over the following pages

1. Public transport is not a viable option for many with dogs and it does not serve into the park on weekdays.
2. The proposed car parking charges will cost daily dog walkers over £500 a year – this is a huge cost and will discourage visiting or tax their efforts to keep healthy.
3. Four main reasons are given for the need for charging - two are no longer present following enforcement work which began in 2017. One is subjective and not relevant to charging or not. And the final, all-day parking by non-park users, could easily be solved by introducing a time limit and/or time zones for parking
4. Charging is also proposed for Upper Lodges and Chalk Hill car parks. These are far away from any of the issues listed (around a 10-minute drive, nearly an hour walk) and, if charges were introduced, displaced local parking would cause significant road safety issues. These risks along with issues caused by dog walkers exercising in less suitable areas do not seem to have been considered and quantified as they should have been
5. We would like to see expected profits from parking and what alternatives are being considered to raise revenue.
6. If there are no other alternatives to charging, we would like the council to re-instate its promise to offer a low-price annual pass (with, we suggest, a 4-hour limit to prevent abuse by all day non-park users)
7. Walking a dog is good for human health. Numerous studies have shown physical and mental benefits. Dog walking adds around a million hours of exercise each year for Brighton and Hove residents. The council's city plan says that it supports promoting exercise; this proposal is effectively a tax on people who want to continue to use the park to exercise and so is against the city's stated health aims
8. The TRO reason statement contains a factual error. It states, "*Many visitors to the park, both now in and in the future, will arrive by public transport and will therefore not be affected by parking charges*". We think that "many" is incorrect and should be removed. Many is defined as most or majority. However, the council's own TRO report (11th Oct 2016) states "88% of visitor drove or were driven to the park". One in 8 by all other means is certainly not a majority. The email response to the TRO from the Parking Infrastructure Team and Stanmer Project Team in April 2020 states "all previous visitor research shows that the

majority of people travel to Stanmer by car". We, therefore, think that the reason statement has a serious error and should be changed from "Many visitors..." to "A few visitors (around 1 in 8) arrive in the park by means other than car so these proposed parking charges will affect the vast majority of park users"

Ideally, we would like to see short term parking remain free to encourage dog walking and exercise around the park grounds. We do understand the wish to show on-going revenues for the park so if car park charging is to be introduced, we believe that there is a more positive way to achieve this:

- A "Park Supporter" membership could be introduced (along with ad hoc parking charges for infrequent users).
- This membership could provide free parking (eg. 4 hours) and other benefits (eg. Discounts at café, bike rental etc). It could also be sold at these sites (as well as online) helping distribution and, for them, encouraging repeat park visits.
- Take the best from the Forestry Commission's "Discovery Pass" scheme and other similar supporter membership groups such as the National Trust.
- All revenues go to the park. This would provide both a revenue stream and a membership group who could be contacted (with permissions) for park fundraising, volunteering etc.

We feel that this "Park Supporter" (or another more creative name!) is a way to achieve on-going revenues in a positive way. It would allow locals to regularly enjoy the park, feel more of a part of the project, as well as support its upkeep for a membership fee (eg. £30-£40 per year)

Regular park users

Previous proposals helped daily/regular park users. The current proposals remove an option to buy an annual pass. We have already seen concern that daily parking charges would cost individuals over £500 to over £900 a year (for up to 2 and up to 4 hours parking). One pensioner commented how could they afford an extra £50 per month for parking?

We would like to see the annual pass option be re-introduced. We can see that there is a risk that this could be abused by all day parkers, so we propose that it is targeted at legitimate park users. We think this could be done by making the pass valid for 4 hours (with no return within 4 hours).

We see the forestry commissions "Discovery Pass" as a good model for this. Their car parks have similar daily charges, but an annual pass covering 4 leisure sites is £32.

<https://www.forestryengland.uk/friston-forest/friston-forest-seven-sisters-country-park-and-abbots-wood-membership>

We think Brighton and Hove council could offer a similar scheme. Up to 4 hours parking at leisure sites (Stanmer Park but could also include Preston Park, East Brighton etc). This would help maintain residents' physical and mental health and be a positive option rather than parking charges being seen as a health tax.

Note that in many cases we do not see public transport as a viable option to reach these parks for

many dog owners. Firstly, the buses and trains could not cope with the numbers involved. Multiple dogs from multiple households may well bark at each other disturbing and potentially distressing other bus users. Secondly, would mud (or worse!) covered dogs really be welcome travel companions?

Response to Statement of Reasons (quotes from reason statement in Italics), along with our response to each point

The proposal will help to address problems and complaints already experienced during peak periods, including:

- *The current location of some of the car parks in the designed 18th century landscape detract from its heritage value.*

Over time several smaller car parks have become used. The proposal is to remove many of these and have a smaller number of large parks. You can argue whether having more smaller car parks or fewer larger car parks causes more or less of a heritage issue - it is subjective. More smaller car parks provide a way of helping spread people around the park. This helps minimise issues between types of park users and helps to ensure that the whole park is used better (as people, especially those with lots of items such as families picnicking tend to stay closer to the car park). Also, in the current situation, this helps social distancing. Therefore, we feel that all these car parks should stay during the current Covid-19 crisis. If they are closed later, this should be done in way that is easy to re-instate if social distancing is required in future

- *The car parks to the south of the park are often full of non- park users, often parking all day.*

All day parking, mainly by university staff and students is an issue. This is because of the charges for them to park at the university site. We feel that the all-day parking can be stopped by introducing a 4 hour free maximum parking limit with a small section of paid parking for those wanting to stay over 4 hours (in the council report Oct 16, only 9% of park users wanted all day parking).

We think that the final two issues have both been resolved by the introduction of enforcement in 2017. If an organisation could continue enforcement but with the addition of a 4 hour free limit then we feel this would resolve all the issues listed

(• *Parked cars left along the roadway and verges has caused blockages and disruption for the park's 78 bus service, resulting in the loss of the week day service, deterring and inconveniencing bus users.*

• *A perception by some members of the public that parking anywhere is acceptable at Stanmer Park, in many cases affecting access for pedestrians, those with disabilities and other vulnerable park users.)*

Income from car parking charges will be ring fenced for use in Stanmer Park and the wider estate to continue the investment and protection of important historic structures, and management and maintenance of the park.

We suspect that this is the main reason behind wishing to introduce charging. However, no figures are given to see sums expected to be raised and alternative options. This seems to be the only reason for introducing as of the four needs listed, two are no longer present. One is subjective and not relevant to charging or not. And the final, all day parking by non-park users, could easily be

solved by introducing a time limit and/or time zones for parking. Can the council be transparent and share income expectations?

Many visitors to the park, both now in and in the future, will arrive by public transport and will therefore not be affected by parking charges

We think that “many” is incorrect and should be removed. Many is defined as most or majority. However, the council’s own TRO report (11th Oct 2016) states “88% of visitor drove or were driven to the park”. One in 8 by all other means is certainly not a majority. The email response to the TRO from the Parking Infrastructure Team and Stanmer Project Team in April 2020 states “all previous visitor research shows that the majority of people travel to Stanmer by car”. We, therefore, think that the reason statement has a serious error and should be changed from “Many visitors...” to “A few visitors (around 1 in 8) arrive in the park by means other than car so these proposed parking charges will affect the vast majority of park users”

There is no public transport into the park during weekdays and is limited at weekends. In practical terms, the public transport options do not support the number of dog walkers using the park. So, is the aim for these dog walkers to go elsewhere? To pay? Or a mix of both?

Upper Lodges and Chalk Hill Car parks

There are 4 reasons stated for the parking changes. None of these apply to Upper Lodges and Chalk Hill car parks. These are a ten-minute drive or around an hour walk away from the other car parks and issues stated, so we believe that these should not be included in the scheme. In addition, Upper Lodges and Chalk Hill car parks sit on or near roads with 60mph speed limits. These roads do not have parking restrictions on them and there are several road verges and laybys nearby which we believe people will use if parking charges are introduced.

The risks from this do not seem to have been considered by these proposals so we believe that there is no justification for the scheme to include Upper Lodges or Chalk Hill car parks. We think that these should be removed from this scheme as they are so remote from the issues listed (indeed a fair proportion of Brighton and Hove is within a closer drive!) and will cause significant road safety issues. If these sites are included, we see a high probability of legal challenge which the council does not seem to have any answer to. We suggest removing them and, if shown necessary, including them along with other work as part of a wider safety scheme at a later stage

Walking a dog is good for human health

There have been numerous studies which show how dog walking helps human physical and mental health. Links to summary below. It shows average walk time increases by around half an hour a week for a dog owner vs non dog owner. This amounts to around a million extra hours of exercise for people who have dogs in Brighton and Hove each year.

How much money does this physical activity get from the council? One of the top physical activity by time undertaken in the City. How many mentions does dog walking get in the council’s 19 page “Sport and Physical Activity Strategy 2013-2018” (latest version in B&H). The answer is none. Nothing in the plan, nothing in the budgets

We feel that the council should support around a million incremental hours of exercise by local residents each year. The walking environment is key to achieving longer distances and Stanmer Park is a great place to enjoy and explore. These proposals effectively penalise people for exercising more. This is wrong and a tax on people who want to maintain their health.

In the city plan (2020-2023) the council states “We will focus on preventative services in delivering the high level goals of our health and wellbeing strategy: starting, living, ageing and dying well. This includes promoting healthy eating, physical activity, sexual health, reducing smoking and substance misuse and reducing social isolation”. However, the introduction of parking charges in a leisure park will place a charge on physical activity (and so reduce not increase it) and mean dog walkers will visit less, increasing social isolation. So the proposals as they stand do not fit with the city’s plan

We think that park visits should be free (for up to 4 hours) so that people can be encouraged to exercise and take advantage of the fantastic environment of Stanmer Park. With 7 in 8 park visitors arriving by car (and probably a higher proportion of dog walkers), we think taxing car parking will discourage people and will ration the park to those most able to pay.

<https://www.bupa.co.uk/newsroom/ourviews/benefits-dog-walking>

Other comments

Has the council/SDNP carried out a study into where dog walkers will go following the introduction of parking charges and how this impact on other areas/livestock etc (as referenced in page 6 of the Parliamentary report into animal welfare) -

http://www.sheepwatch.co.uk/uploads/2/5/5/9/25596304/apgaw_livestock_worrying_report_2017_1_.pdf

Summary of comments from our members on the TRO:

The scheme around the perimeter of Hove Park is good. Free for 4 hours. Stops people parking there for work

I love Stanmer it’s one of my favourite places but I won’t be able to afford the daily charges. 😞

Absolute joke tbh, I do think it needs to be patrolled more as uni students park there weekdays. But charging is just ruining it.

After speaking with park workers one of the reasons put to me for charges particularly at upper lodges was to reduce use by commercial dog walkers. Most days at around 9am the car park is full to bursting with professional walkers as well as others of course. They

also do not like the mass walks of up to 10 dogs. (I agree) I know there are lots that don't 😊. In my opinion these are the only people who will be able to justify the cost to park there as they are earning money on each walk they do

Is this council policy? If so, where are you expecting the professional dog walkers to relocate to? Have the risks been assessed for this?

I would stop going if I had to pay and stick to Hollingbury golf course & 39 acres. Also don't see how they can justify charging for Chalk Farm given the appalling state it is always in. Do they intend to fit CCTV? I can't see any mention in plans. If not there will remain a fly tipping problem.

During Sussex University term time it is difficult to park ANYWHERE due to student parking. I would happily pay a couple of quid to ensure I could park.

I remember the days when people flocked to this park, to socialize & have picnics and play rounders, and have fun, paying to park will leave it deserted

It will force a change of habit for me. I will walk my dog locally. That is not such a bad thing.... Just less time off the lead for my dog.

You might as well build homes for the homeless, no-one's going to go there if you start charging, when parks etc. Comes out of our forever increasing council bloody tax!!! Rant over 😡

Brighton council killing the city now killing open spaces with their greed on parking charges

I pay enough for my residence permit 10 mins down the road and still struggle to park so certainly won't be paying anymore

This is all down to the students parking there as they have to pay to use the car parks (which are empty) in the Uni grounds. Best option is to allow up to 3 hours free then charge after that