



PRELIMINARY FEASIBILITY REPORT ON THE PROPOSED INTRODUCTION OF PARKING CHARGES ON ASHDOWN FOREST

Contents

1. Introduction	2
2. Timeline and decision schedule	2
3. Preparatory work undertaken.....	2
<i>Research and information gathering</i>	<i>2</i>
<i>The case for car park charging.....</i>	<i>4</i>
<i>Public relations.....</i>	<i>4</i>
<i>Public consultation</i>	<i>5</i>
4. Decisions and recommendations	5
<i>The tariff structure</i>	<i>5</i>
5. Conclusion	7

1. Introduction

The Board approved an investigation into the potential of introducing car park charging on Ashdown Forest on the 12th of July 2021.

A detailed analysis and business case is in preparation. A comprehensive business plan and proposal will be presented to the Board for the 25th of October extraordinary meeting.

This feasibility document is presented to allow the Board to consider a proposed timeline and decision process required to launch a scheme, dependent on approval, on the 2nd of April 2022. This date ties into the Medium Term Financial Plan and financial years.

2. Timeline and decision schedule

To achieve a proposed launch date of 2nd April 2022, a project plan has been developed. This plan is achievable though there are risks. These include supply chain risk and permission processes delays.

The recommended decision making in summary:

- 1. Extraordinary Board Meeting - 27 September 2021**
Agreement to proceed to the development of a full business plan and proposal
- 2. Extraordinary Board Meeting – 25 October 2021**
Agreement in principle to introduce car parking charging based on submitted proposal
- 3. Full Board Meeting – TBD**
Agreement to proceed with car park charging based on final proposal submitted following a public consultation process on implementation methods

3. Preparatory work undertaken

Research and information gathering

The feasibility of introducing parking charges on Ashdown Forest to deliver a workable scheme has been explored. The headline ability of Ashdown Forest's car parks to accommodate a parking scheme has been investigated. The required elements of legality, charging solutions and presence of available management companies have been evaluated. Consultation with other organisations who have introduced charging has been a key focus.

Legal questions: The legality of car park charging on Ashdown Forest has been investigated and no impediments have been identified. The need for planning approval for the signage and machines is under investigation with Wealden District Council but is believed unlikely to be required. Whether Common Land consent is needed for placing signs and charging machines is also being investigated.

In the legislation, permission to erect 'small direction signs and information boards' is not required. There is no reference to charging machines but may be allowable as they "... are so small ... they do not impede access" and "do not constitute a new impediment to access". Enquires are ongoing. If consents are required, these are achievable within the project timescale.

Habitat Risk Assessment: This process is to ensure that major changes do not result in impacts on the international environmental site designation and species. A full Habitat Risk Assessment (HRA) may only be required should planning consent for the infrastructure be necessary. It has been discussed with Wealden District Council, the competent authority for the HRA, that the production of a briefer HRA report showing consideration of the impact on the European protected designations would demonstrate best practice. A quote from Footprint Ecology, a leader in the preparation of HRAs, has been secured along with a production window in January 2022.

Suitable parking solutions: Mobile phone coverage on car parks has been tested to determine whether app-based systems will work and whether fixed machines will function. Further testing is required but

mobile phone coverage, following on-the-ground assessment, is sufficient across the majority of car parks. Initial scheme design has parking machines in five Forest locations (Forest Centre, Gill's Lap, King's Standing, Box and Long car parks).

Non-standard car parks: A limited number of car parks have specific considerations attached to them. These may impact on their inclusion within a Forest wide parking scheme. One-to-one discussions with parties with interests in these car parks have been held or are under way. Of particular interest will be the management of three car parks (Pooh and the two A22 Millbrook car parks) owned by East Sussex County Council. Preliminary discussions have been held to explore the Forest taking on responsibility for these car parks to include them in the Forest-wide scheme. Further discussions are required. If they are not included, the wider programme can continue.

Targeted consultations: Advanced conversations have been had with local, district and county bodies as well as several interested organisations. None have raised opposition to the introduction of parking charges. This includes the local MP, ESCC, Wealden District Council, Parish Councillors, Sussex Police and an increasing number of other groups.

Consultations with car park management companies: Meetings have been held with companies to gain an understanding of the range of services they provide and the technical solutions for car park charging appropriate to Ashdown Forest.

Maximising the range of options for visitors to pay to park via a combination of mobile phone app-based systems, web-based systems and car park ticket machines is the best solution. Though cash payments will not be accepted, it is important to provide a range of ways to pay, especially as some visitors may be uncomfortable with app based systems.

The payment systems will be combined with car park wardening to increase compliance and to respond to displacement parking on Forest tracks. Wardens would be provided by a contracted management company and, ideally, will work on Ashdown Forest regularly and be locally recruited. This will allow them to accumulate knowledge about the Forest, support visitors more effectively, and understand and contribute towards positive relationships between Ashdown Forest and its users.

Benchmarking: A benchmarking process has been undertaken around the tariffs charged by 11 similar organisations or destinations to ensure Forest tariffs would be comparable and thus reasonable. Details will follow in the full business plan.

Tariffs: Based around the benchmarking process, three tariffs ranges have been used in revenue projections: low, medium and high (see Table 1).

Table 1. Possible tariff schedules used in income projections

Duration of payment	Low charge	Medium charge	High charge
Up to 1 hour	£1.00	£2.00	£2.50
Up to 2 hours	£2.00	£2.50	£3.00
Up to 4 hours	£3.00	£4.00	£5.00
All day	£4.00	£5.00	£6.00
Annual pass	£40	£80 to £90	£120

Once management costs, interest and loan repayments (for the installation of infrastructure), and VAT have been deducted, estimated net annual revenues from these tariffs range from £58,000 to £208,000. There are elements of uncertainty over these figures. This is due to incomplete data on the number of actual visitors, as opposed to visits, to Ashdown Forest. Uncertainties include the level of up-take of an annual parking pass, and the proportion of visitors who will purchase hourly, half day or full day tickets. Despite these unknowns we believe the lowest figure of £58,000 to be a worst case scenario. The Malvern Hills Trust, a similar type of organisation to the Conservators saw an income of

£289,167 in 2019/20 from car park charging in spite of a lower number of visitors, a smaller land area and fewer car parks.

It is important to note that even the lowest projected income would improve Ashdown Forest's finances and demonstrate that the organisation is working to be self sufficient.

Displacement parking: It is recognised that a minority of Forest users may avoid parking charges and attempt to park on roads and verges, at least initially. Two areas of concern have been identified around displacement parking.

The first concerns the legal position regarding parking on road verges or the tarmac surface itself. Highways may include a road verge. Notwithstanding Ashdown Forest Bye-law 2, which allows parking only in official car parks, initial ESCC legal opinion is that Ashdown Forest will not be able to prevent parking on highway verges, as this is legal under the Road Traffic Act 1984. Further legal opinion will be sought on this matter from a Commons specialist.

The second concerns the degree that displacement parking on Ashdown Forest managed tracks will impact on residents. An assessment and mapping of potential or likely sites for displacement parking is being undertaken. Bye-law 2 would be available in these areas and charging could be enforced.

If large numbers of visitors choose to park on the highway, this may result in obstruction and/or frustration. If the obstruction is dangerous (reference the Highway Code) then that is a police matter. For parking that is not dangerous, but which slows traffic there are other options. These include making a specific Traffic Regulation Order, which would bring in yellow lines. However, the impasse between Sussex Police and Wealden District Council over who should hold responsibility for enforcing parking restrictions in the district makes their introduction initially problematic. Ashdown Forest has been in discussion with interested parties over this issue and it is understood that car park charging can proceed notwithstanding. There is a senior stakeholder meeting around the wider Wealden issue on the 23rd of September that the Forest has been asked to attend. The CEO will report on this on the 27th of September.

The case for car park charging

To explain proposals to introduce car park charging to Forest users and the public a set of materials that lay out the conservation, amenity and financial cases for the scheme are being developed. This includes the vision for the Forest, an updated website, the full business plan and a communications programme.

Whilst the change to introduce parking is unlikely to be universally popular it is important to engage with the public.

There is key messaging to allow engagement with the Forest's regular visitors. For example, it would be beneficial for the 63% of visitors to the Forest described as 'regular visitors', visiting at least once a week, to purchase an annual parking pass as this acts as a concession. The intention is to price the annual pass in relation to the price of an hourly parking ticket to deliver meaningful savings as a concession to local and regular visitors. However, over inflating the price of an hourly parking ticket to achieve a concession must be tuned to still encourage Forest visitors to park in the car parks.

Public relations

We are building, with specialist support, an information programme on the charging proposals. This is based around:

- raising the profile of Ashdown Forest and emphasising the benefit that the site provides to visitors and residents
- increasing the understanding of the financial plight of the Forest and the difficulty of delivering positive conservation and amenity outcomes as a result

- raising the prospect of threats to the future survival of Ashdown Forest as an important conservation and amenity area
- explaining the planned introduction of car park charging as part of the necessary solution to the problem

Public consultation

Though not required by the Act it is important that a public consultation on the proposed scheme’s implementation takes place. The consultation will gather public perspectives on a specific proposal and may result in modifications. It is not intended that the consultation is on a yes/no decision for the charging itself. That decision lies with the Conservators and the Ashdown Forest Trust. Instead, the consultation would be on the proposed rates, take up of annual passes and further comments.

A one-month consultation process will be run between the two key Board decisions points: agreeing a scheme in principle and agreeing a specific scheme. This will help introduce the scheme and allow it to be fine-tuned to public feedback if necessary. The East Sussex County Council Communications Department has agreed to assist with, and host, the public consultation.

4. Decisions and recommendations

Several key decisions will need to be made with respect to the design and implementation of a parking charge scheme.

The tariff structure

The tariff structure selected is the decision likely to have the most significant impact on the revenues Ashdown Forest will earn from car park charging. Calculations based on the three tariffs, low, medium and high, shown in Table 1, give the following annual revenue projections.

Low tariff:	£58,000
Medium tariff:	£133,000 to £149,000
High tariff:	£208,000

Recommendation

The medium tariff proposal is the working proposal:

- The medium tariff is the median within the range of tariffs being charged by other similar venues and organisations.
- The estimated annual revenue from the medium tariff (£133,000) will provide a degree of surplus above the 2021/22 annual deficit. This will allow a limited increased expenditure on car park maintenance. The low tariff would not allow significant improvements to be made to car parks or other Forest infrastructure.
- The board may wish to consider the high tariff when they review the business plan. This would significantly improve the financial position of Ashdown Forest, but it is at the upper end of comparable tariffs. The comparable in that bracket is Epping Forest, which is a similar large, open access space. An annual pass of £100 would allow regular visitors to visit for an unlimited time for less than £2/week.
- At a charge of £2 for one hour parking, the proposed medium tariff, the purchasing of an annual pass would provide savings for ‘regular’ visitors for all costs of an annual pass below £110 a year (see Table 2).
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Table 2. Estimated savings made by purchasing an annual pass

Annual pass cost	Visits 7/week 365/year	Visits 3/week 156/year	Visits 2/week 104/year	Visits 1/week 52/year	Savings*	% savings
£40	£0.11	£0.26	£0.38	£0.77	£64	62
£50	£0.14	£0.32	£0.48	£0.96	£54	52
£60	£0.16	£0.38	£0.58	£1.15	£44	42
£70	£0.19	£0.45	£0.67	£1.35	£34	33
£80	£0.22	£0.51	£0.77	£1.54	£24	23
£90	£0.25	£0.58	£0.87	£1.73	£14	13
£100	£0.27	£0.64	£0.96	£1.92	£4	4
£110	£0.30	£0.71	£1.06	£2.12	-£6	-6
£120	£0.33	£0.77	£1.15	£2.31	-£16	-15

* Savings calculated as the difference between the cost of an annual pass and the cost of 52 hourly tickets at £2 per ticket. Savings made by individuals visiting more frequently and for longer are considerably greater.

a. *The source of the initial investment in infrastructure*

Quotes and management fees for implementing the programme are being investigated. This includes for machines, the online system and signage. It also includes Forest Centre administration support for the first year of the project. The implementation cost is estimated at £150,000. There are different options for sourcing this funding. The larger parking management contractors can cover the initial investment, recovering their costs from income. Alternatively the Forest could pay the initial cost which would see income into the organisation sooner. ESCC have been approached to provide terms for a possible loan. There is also the option to seek 10% of the cost from the Farming in Protected Landscape fund administered by the High Weald AONB.

If a source of funds for the initial investment can be found, either as a loan or a grant, this is preferable as a management company may include a higher interest rate on the implementation cost.

Recommendation

Identify a source of an implementing loan or a grant as this increases Ashdown Forest's immediate income from the scheme.

b. *Contracting out the parking charging scheme*

The management of a parking scheme is a specialist area. As such it would be contracted out to a specialist operating company. Key services need to be delivered as part of the scheme:

- Designing, installing and maintaining car park charging infrastructure, both machines and signage
- Managing parking payments through parking machines, phone apps and websites
- Issuing annual parking permits
- 'Wardening' of car parking to encourage compliance and provide other services
- Issuing and following up penalties for non-compliance
- Responding to customer complaints or queries

These different functions can be undertaken by a single company or be split between different companies. Some functions could be retained by Ashdown Forest. In discussion with other sites that charge, the business case is strongest around one contractor providing a full service.

Recommendation

Identify and contract a single company for all elements of the parking scheme through a formal tendering process. Ensure access, within data protection regulations, by Ashdown Forest to data on visitors and the details of those who purchase annual parking permits. The intention would be to be able to follow up with visitors to explain how their contributions are assisting the Forest.

c. Parking payment enforcement decisions

Management of any elements of fines for those who choose not to park in a car park or purchase a ticket is a significant consideration. If the management company is allowed to retain an income from the fine then this can incentivise the firm to levy fines rather than looking for other solutions to non-compliance, for example assisting car park users to navigate the system.

The alternative model is for Ashdown Forest to retain the income from any fines issued to allow greater control over the system. The management firm would charge a fee to Ashdown Forest for each fine pursued. This would be covered by the fine itself but would reduce overall income received.

Recommendation

The Conservators of Ashdown Forest exist to facilitate access to the Forest whilst caring for the land. A key consideration in achieving this is generating a culture of partnership and participation. Ashdown Forest should therefore retain full control over decisions to enforce parking regulations through fines by not making them part of the income of the management firm.

5. Conclusion

Ashdown Forest is facing significant financial challenges. The introduction of car park charging will not solve these alone. Nonetheless, with the withdrawal of ESCC deficit funding, the proposed scheme is likely to make up a shortfall, and potentially add a surplus to the budget for several years. It allows a regular income stream that would allow the Conservators to consider other loan, match funding and purchase options in the future for further projects and grants. It gives time to The Ashdown Forest Foundation to build their funding base to support the work of the Conservators. It demonstrates the clear desire for the Conservators of Ashdown Forest to respond to wider societal changes in public funding and generate income on and around site to cover the costs of management.

The scheme, alongside all major changes, will present deep challenges to the organisation in terms of communication, working with external partners and increasing engagement with visitors. The feasibility work has shown that these are surmountable. As such, it is recommended that the Board approve the next stage of the project which is the timetable and production of documents to an approval process.