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Consultations Team
Canterbury City Council
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Canterbury Society Response to the Proposed Changes to Charges and Conditions in Council Car Parks for 2026/27

Dear colleagues,

Please find attached our response to the consultation on the proposed changes to charges and conditions in council car parks.

This submission is evidence-based and draws directly on analysis of the datasets supplied by the Council further to our request for the underlying information referenced in the Cabinet report of 3 November 2025. Our comments focus on how far the available evidence supports the objectives set out in the consultation, particularly in relation to congestion management, behavioural change, and economic impact.

In reviewing the data, we identified a number of important limitations in the current evidence base. In particular, behavioural and occupancy data are available only at an aggregated, system-wide level and, in the case of occupancy, relate only to ANPR-equipped car parks. This limits the ability to assess conditions at individual locations, to distinguish between displacement and suppression of demand, or to evaluate how pricing changes affect different parts of the parking estate. As a result, some of the location-specific implications of the Cabinet proposals cannot be robustly tested using the data currently available.

Our response is set out in **Appendix A** and reflects both what the evidence does support and where caution is warranted because of these constraints. Where proposals are supported, this is noted. Where objections or concerns are raised, these are grounded in the limits and implications of the available evidence rather than in principle opposition.

For transparency, the key datasets and summary outputs underpinning our assessment are presented in **Appendix B (Supporting Evidence Tables)**.

We submit these comments in the spirit of constructive engagement and with the aim of supporting transparent, evidence-led decision-making that aligns with the Council's wider economic, transport, and climate objectives.

Thank you for the opportunity to respond. We would be pleased to clarify any aspect of our submission if that would be helpful.

Yours sincerely,

Guy Mayhew
Deputy Chair - Canterbury Society

Appendix A: Response to Specific Consultation Questions

Item 1: It is proposed that the hourly rate tariff for Band 1 car parks will increase by 10p

How do you wish to respond to this proposal?: **Object**

The evidence supplied does not support a further increase to Band 1 hourly charges.

The occupancy data available to officers relate only to **ANPR-equipped car parks** and are aggregated across those sites. They cannot be disaggregated by individual location. As a result, neither consultees nor decision-makers are able to assess whether any specific Band 1 car parks are routinely capacity constrained.

Within the ANPR-equipped estate, the combined capacity is approximately **2,035 spaces**. The maximum occupancy recorded in the dataset supplied (April 2023 to March 2025) is **1,715 vehicles**, equivalent to around **84% utilisation** at peak. This peak occurs during a narrow midday window and represents the system's tightest observed operating point. However, it does not demonstrate persistent congestion, routine capacity exceedance, or widespread scarcity across the parking estate.

Moreover, the occupancy dataset excludes **non-ANPR car parks**, meaning it does not represent the full Band 1 parking offer. As a result, it is not possible to assess overall system utilisation or to determine whether a blanket increase across all Band 1 car parks is proportionate or targeted. This makes it difficult to justify a uniform increase across all Band 1 car parks, rather than a more targeted response to specific locations or times.

Parking income has risen by approximately **9–11%**, while paid parking acts increased by **only ~0.25%**, indicating that recent income growth is driven primarily by pricing rather than increased use.

The parking system is structurally dependent on short-stay visits. Around **56%** of recorded dwell-time activity is two hours or less, while long-stay use (over six hours) represents only around **10%** of activity. Long-stay parking is therefore too small to offset any decline in short-stay demand, and even modest losses in Band 1 usage cannot realistically be replaced elsewhere in the system.

Further, the Council has confirmed that **no analysis of dwell time or length of stay was undertaken or relied upon** when developing the proposal, and that the assessment was based solely on usage and income data. While these metrics describe volume and revenue outcomes, they do not evidence behavioural response or economic impact.

In the absence of behavioural analysis, and given the partial and aggregated nature of the occupancy data, it is not possible to assess whether further price increases would affect visit duration, trip frequency, or discretionary short-stay use at Band 1 locations.

In this context, the proposed increase is not justified on congestion or demand-management grounds and carries a clear risk of undermining city and town centre vitality without demonstrable benefit in terms of behavioural change.

Item 2: It is proposed that all off-street parking permits will increase by approximately 4%

How do you wish to respond to this proposal?: **Neither**

We do not object in principle to a modest increase in off-street parking permits to reflect inflation. However, the proposal is not supported by any analysis of permit-holder behaviour, price sensitivity, or interaction with wider parking and transport objectives.

Permit users represent a distinct group from short-stay visitors, and changes to permit pricing should be considered separately from hourly tariffs. The consultation material does not explain whether the proposed increase is intended to manage demand, recover costs, or simply raise income, nor does it assess the cumulative impact alongside other proposed parking charge increases.

A clearer evidence base, including permit usage patterns and any anticipated behavioural effects, would help justify this proposal and ensure it aligns with the Council's wider transport, climate, and economic objectives.

Item 4: It is proposed to allow the sum of £10k in the budget for parking discounts to encourage people to visit our towns and city at specific times i.e. for events and at Christmas

How do you wish to respond to this proposal?: **Support**

We support the principle of targeted parking discounts. However, it is difficult to have confidence that a £10k budget will deliver meaningful economic impact in the absence of a clear evidence base from the pricing review.

The consultation material does not explain how discount levels, locations, or timing will be selected, nor how success will be measured in terms of increased visits, longer stays, or additional spend in town and city centres. This is particularly important given that recent income growth appears to be price-led rather than demand-led, and that the behavioural evidence available to the Council is aggregated rather than location-specific.

Without clarity on the behavioural assumptions underpinning the pricing strategy, there is a risk that discounts will be too small, too diffuse, or poorly targeted to influence behaviour. Setting out clear objectives, targeting criteria, and evaluation measures would provide greater assurance that the budget will achieve its intended economic effect rather than simply offsetting recent price increases.

At a minimum, clarity on target locations, time periods, expected behavioural response, and how outcomes will be evaluated is needed to have confidence in the economic impact of this measure.

Appendix B: Supporting Evidence Tables

Note: All occupancy and dwell-time data in Appendix B relate only to ANPR-equipped car parks and are aggregated at system level. The data do not permit site-specific or behavioural analysis.

Table B1: System-wide hourly occupancy profile (all Canterbury ANPR car parks) - April 2023 to March 2025

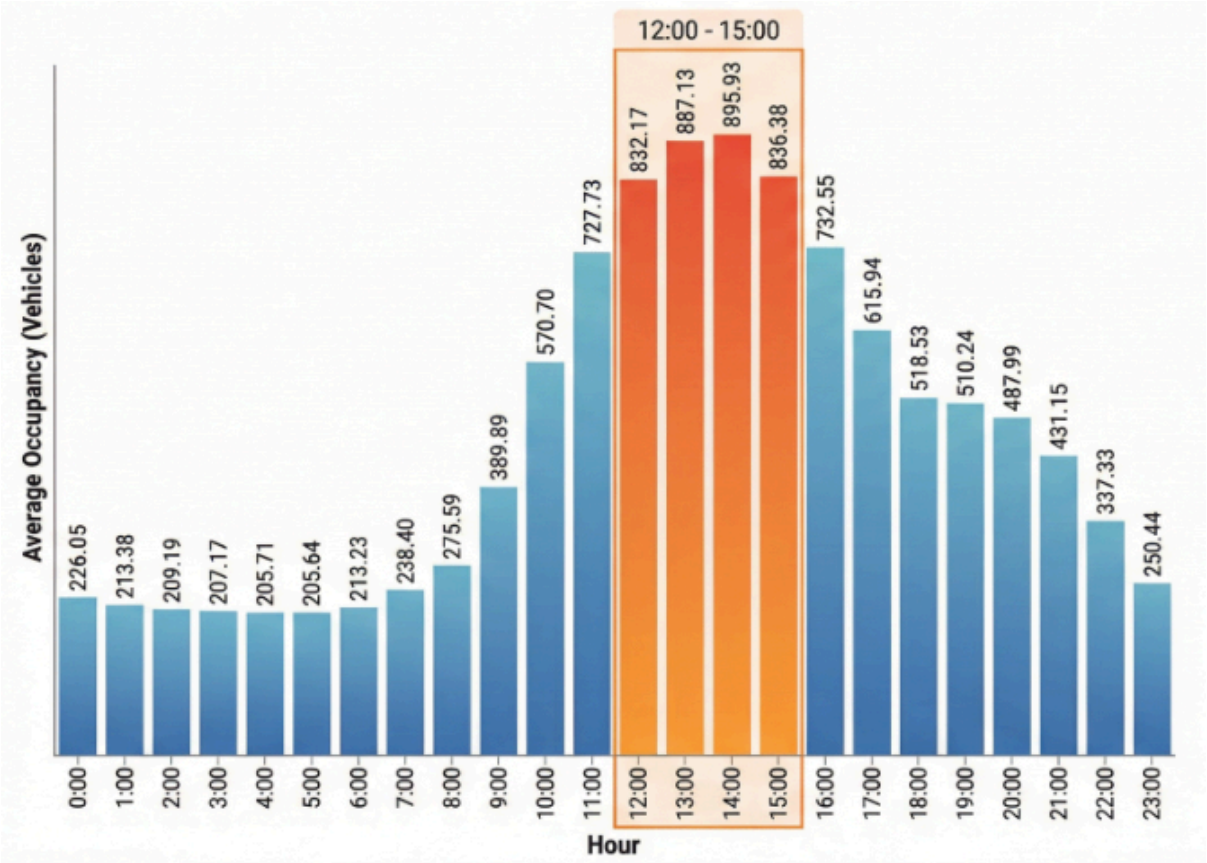

Table B2: Maximum observed occupancy vs system capacity

Metric	Value
Maximum Occupancy Recorded	1,715 vehicles
Date & Time of Peak	14:00 on 30 March 2024
Total ANPR System Capacity	2,035 spaces
Peak Utilization Rate	84.30%
Maximum Available Headroom	320 spaces (15.7%)

Table B3: Paid parking acts vs total income (year-on-year)

Financial Year	Paid Parking Acts	Total Income	% Change (Acts)	% Change (Income)
2023/24	1,333,891	£6,544,551.32	—	—
2024/25	1,337,250	£7,156,265.97	0.0025	0.0935

Table B4: System-wide ANPR dwell-time distribution

Dwell-Time Band	Parking Sessions	Percentage of Total	Cumulative %
Up to 2 hours	1,007,633	55.89%	55.89%
2–6 hours	610,464	33.86%	89.75%
Over 6 hours	184,937	10.26%	100.00%
TOTAL	**1,803,034**	**100.00%**	