

# NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

## Environment, Regeneration & Streetscene Services Cabinet Board

# 14<sup>th</sup> September 2023 Report of the Head of Engineering & Transport – David W. Griffiths

#### Matter for Decision

Wards Affected: All Wards

#### Parking Review 2023

#### **Purpose of the Report:**

For members to consider the task and finish groups recommendations and officers feedback on the parking review options paper in relation to fees and charges to aid recovery following the pandemic with the aim of producing a balanced budget within parking services.

### **Executive Summary:**

This report is to recommend changes to free car parking arrangements over the Christmas period, current car parking charges, permits charges and the introduction of a charging regime along Aberavon Seafront.

# **Background:**

Members will be aware that at the last Cabinet Board on July 28<sup>th</sup> 2023, that decision-making was deferred following Scrutiny Committee recommendations. These subsequent recommendations are now included in this report along with further comment to enable Cabinet Board to reach an informed decision.

There is a significant amount of anecdotal evidence, opinion and speculation over the relationship between car parking provision and town centre prosperity. Somewhat paradoxically this ranges from arguments suggesting that 'greater accessibility for cars on the high street will increase the viability of town centres by improving trading for business' to 'restricting accessibility for cars will increase the viability of town centres by cutting congestion and pollution whilst making the high street more pedestrian friendly and increasing dwell time'.

The Council currently supports a number of parking initiatives which include first hour free and a reduced tariff structure in Pontardawe, and a reduced tariff at the seafront car parks over the winter and summer period.

It is well recognised that people are prepared to pay for good customer service and quality parking facilities. They do not like to pay for poor service and facilities and funds are needed to facilitate this. The British Parking Association of whom the Council are members believe that the people who use the facilities should pay to help to maintain the assets and increasing energy and maintenance costs.

### **On-street Parking Permits**

Permits currently cost £20.00 per annum, and have not been subject to a review since 2010. The current charge no longer covers the admin

cost of producing and supplying a permit due to increased software, postage, materials and staff cost.

- It is proposed that as a minimum, permits are increased from £20.00 to £25.00 to stay at a cost neutral position. Or alternatively,
- That permits are increased from £20.00 to £30.00 to future proof admin costs and contribute to the council's budget pressures.

Authority	12 Months	Replacement
Neath Port	£20	£5
Talbot		
Swansea	Free	£25
Bridgend	Free	Free

Permit costs across neighbouring authorities.

Shown below are all the current permits on issue together with the current income taken, plus the potential income if permits increase to  $\pounds 25.00$  or  $\pounds 30$ .

Permit Type	Cost	Number	Income	Cost	Income	Cost	Income
Care Worker	£20	39	£780	£25	£975	£30	£1,170
Dispensation	£20	14	£280	£25	£350	£30	£420
Family Parking	£20	95	£1,900	£25	£2,375	£30	£2,850
Health Board	£20						
Carer	£20	177	£3,540	£25	£4,425	£30	£5,310
Health Visitor	£20	5	£100	£25	£125	£30	£150
Holiday Visitor	£20	2	£40	£25	£50	£30	£60
Loading	£20	63	£1,260	£25	£1,575	£30	£1,890
Neath Traders Dispensation	£20	42	£840	£25	£1,050	£30	£1,260
Resident	£20	1865	£37,300	£25	£46,625	£30	£55,950

Temporary Resident	£20	21	£420	£25	£525	£30	£630
		2323	£46,460	+25%	£58,075	+50%	£69,060

After Vat, the increases to income are £12,000 to £23,000 Off-Street Parking

The Council car park income funds the maintenance upkeep of car parks to appropriate standards of safety, lighting and equality issues and security standards. The parking income account has spent £4 million over five years running and maintaining the council car parks and car parking machines. £201k of this cost was for the purchase and maintenance of pay and display machines.

In 2022/23, £127,400 has been spent so far on building maintenance in Port Talbot and Neath MSCP's alone, while the income from parking across both car parks is just under £227k.

There are outstanding maintenance issues that will require funding of circa £750k based on the last condition survey to carry out concrete repairs, electrics repair and painting in Port Talbot MSCP and a further £60k to resurface St. Mary's Car Park in Port Talbot.

The income received over the last five financial years is set out below, along with operational costs including utility bills, maintenance, staff costs, insurance, rates, rent and pay and display equipment. This illustrates the income received before VAT. Off-Street income from the Authority's pay and display car parks is subject to VAT @ 20% and the VAT is payable to HMRC.

Further to note, during the financial years 2020/21 and 2021 /22, the council received monies from WG to offset losses from Covid 19, this

ceased in April 2022, and the amounts below include the monies received from Welsh Government.

Year	Income	<u>Operational</u> Costs	Balance
2021/22	£1,135,242	£892,191	£243,121
2020/21	£1,038,995	£769,990	£269,005
2019/20	£1,169,619	£1,002,107	£167,482
2018/19	£1,117,517	£1,079,367	£38,150
2017/18	£874,650	£720,730	£153,920

• Option 1a: - Increase all parking charges due to budget pressure to one of the new tariffs set out below.

Set out below is the current off-street tariff structure together with options for tariff increases. The potential increased revenue is based on the income from 2021/22.

Current	Current Tariff	5%	10%	15%
Tariff	Price	Increase	Increase	Increase
Option				
1 Hour	£1.50	£1.55	£1.65	£1.75
2 Hours	£2.00	£2.10	£2.20	£2.30
3 Hours	£2.50	£2.65	£2.75	£2.85
4 Hours	£3.00	£3.15	£3.30	£3.45
All Day	£3.80	£4.00	£4.20	£4.40
Potential Incre	eased Revenue	£50,000	£100,000	£150,000
After VAT		£41,667	£83,333	£125,000

# • Option 1b: - Increase some parking charges due to budget pressure to the new tariffs set out below.

Any increase to all day parking charges will mostly affect people who work in town centres, a lot of whom will be on the minimum wage. The following option proposes tariff increases on shorter term parking only.

Current Tariff Option	Current Tariff Price	Proposed Tariff Price
1 Hour	£1.50	£1.75
2 Hours	£2.00	£2.30
3 Hours	£2.50	£2.85
4 Hours	£3.00	£3.30
All Day	£3.80	£3.80
Potential Increased Revenue		£100,000
After VAT		£83,333

There is a risk that an increase in tariffs will result in an income loss, if people choose not to use the car parks due to increased cost.

• Option 2: - Reduce parking tariffs to align ourselves with neighbouring authorities and try to attract further footfall into town centres.

Set out below are the comparable tariff structures for neighbouring authorities.

Authority	1 hour	2 hours	3 hours	4 hours	4+ Hours
Neath Port Talbot	£1.50	£2.00	£2.50	£3.30	£3.80
Swansea	£1.00	£2.00	N/A	N/A	£7.00
Bridgend	70p	£1.50	£2.50	£4.00	£6.00

It is noted that the current subsidies for car parking in Swansea will cease from April 2023 and Swansea have announced that they plan to raise an additional £700k per year from parking charges.

If the option to reduce parking charges to try to attract further footfall into town centres is progressed it is not possible to model the financial implications, as we do not have any comparable data to base it on. However, to maintain current revenue we would need to attract 750,000 users into our car parks per year, which is not feasible in town centres of our size.

# • Option 3: - Pontardawe car parking charges be brought into alignment with Neath and Port Talbot town centres.

Currently there is a different tariff structure in Pontardawe; the structure gives the first hour free and reduced charges after that, including free parking on a Sunday.

It is proposed that the free one hour is kept and that all other parking tariffs including Sunday parking is brought into line with the other town centres. This is because when parking charges were first introduced into Pontardawe there were concerns raised by members, as the town centre is a lot smaller than Neath or Port Talbot with a smaller retail offering along with the proximity of the retail park that people would be discouraged from visiting the local shops. This rational has not changed, as the geography remains the same.

# • Option 4a: Season permits increase from the current tariffs to the new tariff set out below.

Currently the Authority operates a season permit system whereby the member of the public purchases a season permit and displays the permit in the front window of the vehicle.

Set out below are the season permit charges for neighbouring Authorities in their off-street car parks as well as this Authority's charge. Bridgend only offer a 3 months and above permit.

Authority	1	3 Months	6 Months	9 Months	12
	Month				Months
Neath Port	£50	£130	£235	£325	£410
Talbot					
Swansea	£75	£220	£440	N/A	£735

Bridgend N/A	£151.20	£302.40	£453.60	£604.80
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It is clear from the above that the charges in NPT are significantly lower than in neighbouring authorities. Below are the current season permits offered to members of the public together with the income, proposed revised charges and projected income.

	Current Season			
Permit Duration	Perm	<u>nits</u>	Income	Daily Rate
Season Permit 12 months	£410	67	£27,470	£1.13
Season Permit 9 months	£325	1	£325	£1.20
Season Permit 6 months	£235	35	£8,225	£1.30
Season Permit 3 months	£130	46	£5,980	£1.44
Season Permit 1 month	£50	6	£300	£1.66
Total number of permits on i	ssue	155	£42,300	

	Pi	roposed		
Permit Duration	<u>Seas</u>	<u>on Permits</u>	Income	Daily Rate
Season Permit 12 months	£500	67	£33,500	£1.39
Season Permit 9 months	£400	1	£400	£1.48
Season Permit 6 months	£300	35	£10,500	£1.62
Season Permit 3 months	£200	46	£9,200	£2.22
Season Permit 1 month	£70	6	£420	£2.33
Total number of permits on issue		155	£54,020	

The potential increased revenue with this option is  $\pounds 11,720$  and the charges would still be lower than those charged by neighbouring authorities. This increase is  $\pounds 10,000$  after VAT

• Option 4b - Season permits increase from the current tariffs to match the tariffs in Bridgend.

	Proposed			
Permit Duration	<u>Seas</u>	on Permits	Income	Daily Rate
Season Permit 12 months	£605	67	£40,535	£1.65
Season Permit 9 months	£453	1	£453	£1.65
Season Permit 6 months	£302	35	£10,570	£1.65
Season Permit 3 months	£151	46	£6,946	£1.65
Season Permit 1 month	£70	6	£420	£2.33
Total number of permits on issue		155	£58,924	

The potential increased revenue associated with this option is  $\pounds 16,624$  and match those in Bridgend that remain lower than those charged in Swansea. This increase is  $\pounds 13,853$  after VAT.

• Option 5: - To decide if the current practice of providing free parking should continue as is, (free parking in town centres for three weeks at a cost of £50,000 in lost revenue) or be amended following feedback and engagement with traders.

For a number of years the council has provided free car parking in the run up to and over the Christmas period. When the press release was published advertising free car parking over Christmas 2022/23 approximately 54,000 social media accounts were reached, comments noted on social media were mainly supportive.

There were, however, some comments from traders that they "would prefer that the free car parking was over the first few weeks of January in Pontardawe to tempt members of the public to go shopping as the period after Christmas is very quiet.", and "that a lot of people have done their Christmas shopping when the offer starts."

Neither Bridgend nor Swansea offer any free parking over the Christmas period. Carmarthen do not offer any free parking in Carmarthen town. They do however, offer free parking in Llanelli on

the weekends from mid-November to Christmas to encourage people into the town. (Members will recall that this was mentioned at the Board meeting on the 2<sup>nd</sup> of December 2022).

The benefit of this is that the people receiving the free parking are shoppers rather than people who work in or close to the town centre between Mondays to Fridays.

Our current offer on free parking at Christmas offers 23 days free parking.

If we replicated what happens in Llanelli that is more comparable to our towns than Swansea, we would be offering 15 days free parking for Christmas trade. Members if so minded could offer a further 5 days free parking, the dates of which could be agreed following consultation with the traders and Viva Port Talbot by the town centre manager who is currently in ongoing dialogue with Viva Port Talbot. The preferred dates will subsequently be implemented by parking services.

In order to ensure that all residents of Neath Port Talbot benefit from this scheme. Passenger Transport Colleagues have investigated the cost of free travel on the local bus network within the County Borough for the six Saturdays and Sundays leading up to Christmas. For Christmas 2023, those dates would be November 18<sup>th</sup>, 19<sup>th</sup>, 25<sup>th</sup>, 26<sup>th</sup> and December 02<sup>nd</sup>, 03<sup>rd</sup>, 09<sup>th</sup>, 10<sup>th</sup>, 16<sup>th</sup>, 17<sup>th</sup>, 24<sup>th</sup> and 25<sup>th</sup>. The estimated cost of providing free travel on the local bus network for those days will be £80,000.

Utilising free travel on the Local Bus Network does offer the opportunity for residents to travel out of County. For example, passengers may wish to travel from Glynneath via Neath and onto Swansea, or Blaengwynfi, Glyncorrwg and Cymmer to Maesteg. These might not benefit the County Borough town centres but does offer a greater option to residents and promote local bus travel in general. It will be important therefore to advise passengers that completely free travel is available only within the County Borough. If residents choose to take advantage of bus services commencing within the County Borough and travelling further afield, for example Swansea or Maesteg then they may well have to pay for their return journey, unless of course the neighbouring local Authority is also operating a similar free travel scheme.

Option 6: - Increase the seafront car parking tariffs from the current rate of £2.00 from 1<sup>st</sup> April to 30<sup>th</sup> September to either £3.00 or £4.00 and increase the current rate of £1.00 from 1<sup>st</sup> October to 31<sup>st</sup> March to either £1.50 or £2.00.

All day car parking at Porthcawl seafront car parks is either  $\pounds$ 3.00 or  $\pounds$ 4.00 depending on which car park you use. The increased tariffs could bring in between  $\pounds$ 47,917 to  $\pounds$ 95,833 in additional income per year depending on the chosen tariff.

# • Option 7: - Introduce charges to the free parking bays along the seafront

Currently the on street car parking bays, despite being located closer to the facilities of the seafront offers free parking, while the car parks that are further away incur a cost for motorists. (It should be noted that there are also currently 2-hour limited waiting within the parking bays on Princess Margaret Way). Swansea council have introduced charges at all of their parking bays facing onto Swansea Bay seafront at a charge of £1.50 for 1 hour and £5.00 all day.

Charging could be introduced via Pay by Phone (cashless) parking within the limited waiting parking bays, at a tariff of £1 per hour for a maximum stay of 2 hours.

It is not possible to quantify the potential income this could generate, as we have no data to base calculations on. The rational for not having pay and display machines along the seafront to take cash is due to high levels of vandalism to machines along the seafront. There would also be a cost of £75,000 to purchase the required amount of machines plus the costs of civil works.

The downfall to this is that it would restrict access to parking to people who do not have smart phones, therefore possibly discriminating against older and poorer people. We will consult with the neighbouring authorities to establish how they have mitigated this risk.

It is proposed to implement the new charging times to mirror those in the seafront car parks i.e. 08.00am to 20.00pm to align with enforcement operational hours.

Further it is also proposed to introduce the new on-street parking charges at the seafront from 1<sup>st</sup> April until 30<sup>th</sup> September. There will be no on-street charge from 1<sup>st</sup> October until 31<sup>st</sup> March.

The options above for on street and off-street parking have the potential to generate between £43k and £189k depending on which combination of options are chosen as illustrated in the table below (**these figures exclude VAT**). Car park income is currently under achieving its income target by £100k, any increases in revenue should be used to offset this deficit.

Options	Lower Option	Higher Option
Increase Permit	£12,000	£23,000
Costs		
Town Centre Car	£41,667	£125,000
Park Tariffs		
Season Ticket Tariffs	£10,000	£13,853
Seafront Car Park	£47,917	£95,833
Tariffs		
Totals	£31,583	£177,686

# Additional Recommendations from the Task & Finish Group

1. The task and finish group recommended that the pedestrianised zone hours of operation in the Neath Town Centre be reviewed to consider closing the pedestrianised zone to vehicles in the evenings as well as the daytime.

## Officer Response:

Subject to available funding a feasibility study could be undertaken to review the operational hours of the Neath pedestrianised zone which will be considered against all other priorities within the Highways Capital Programme or as suggested by members any other regeneration grants that become available which would be subject to a future report to members.

2. Provide an extra hour free on top of current tariffs to blue badge holders.

Officer Response:

Having considered mitigating the increased fees and charges that may affect disabled identified in the IIA by providing an additional hour it is not affordable by the authority. Due to the inyear, current financial pressure faced by parking services currently estimated at a deficit of circa £380k. It is proposed that the existing arrangements continue and that full charges will continue to be applied for blue badge holders in off-street car parks.

3. Explore a Visitors Parking Permit that would cover all car parks / attractions in the county (to include country parks).

Officer Response:

This will be further explored in conjunction with the authority's relevant sections that operate and maintain the country parks.

4. Alter charging hours at the seafront carparks from 07.00am to 22.00pm to 09.00am until 18.00pm.

Officer Response:

In light of the budget income targets already set by council and the current predicted in-year deficit it is recommended that the original recommendation to alter the charging times in the seafront car parks from 07.00am to 22.00pm to 08.00am to 20.00pm remains the same. Dog walkers and residents will gain an extra hour from 7am to 8am to park in the off-street car parks to walk their dogs.

 Review all changes in a year, with an update report in six month's time, to include – data on car park income and usage, town centre/seafront footfall and any other relevant feedback.
 Officer Response:

That the review be undertaken in October 2024 six months after all recommendations have been implemented during April 2024 to allow time for measureable data to be obtained over the summer period.

## Additional Recommendations from Special Environment, Regeneration and Streetscene Services Scrutiny Committee

That the recommendations of the report be approved subject to the following amendments.

1. Option 7 that the charging hours be 9am -6pm on-street.

Officer Response:

That the charging hours recommended in the report for on-street charging (8am to 20:00pm) be implemented as set out in the report as it will align with the proposed charging hours of the off-street sea front car park with a view to the authority mitigating the current budget pressures.

It is important to note that there are the exemptions for blue badge holders (as detailed below) that would exempt them from any proposed fees or time limit should members decide to implement the recommendation.

# The Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (Wales) Regulations 2000

# Exemptions from other provisions of orders under section 45 or 46 of the Road Traffic Regulation Act 1984 which prescribes

- (a) a charge to be paid for a vehicle or vehicle of any class left in a parking place designated by the order;
- (b) a maximum period during which a vehicle may wait in a parking place; or
- (c) a period which must elapse before a vehicle taken away from a parking place may be left there again.

(2) An order to which this regulation applies shall include an exemption from each of the matters so prescribed in favour of a vehicle displaying a disabled person's badge in the relevant position.

2. That a full consultation is undertaken on these proposals with businesses and residents before implementation of any changes.

Officer Response:

When the legal orders are formally advertised to change the offstreet car parking order and on-street traffic orders, residents and businesses will have the opportunity to raise any objections

which will be brought back to a future meeting for Members consideration before any changes are implemented.

## **Financial Impacts:**

Options	Expected Income
Increase Permit	Cost Neutral
Costs	
Increase Town	*83,333
Centre Car Park	
Tariffs	
Increase Season	10,000
Ticket Tariffs	
Increase Seafront	79,800
Car Park Tariffs	
Totals	**£173,133

\*This equates to an overall increase of 10%. \*\*These figures exclude VAT Integrated Impact Assessment:

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

There was some discussion at the 28<sup>th</sup> July 2023 Special Environment, Regeneration & Streetscene Services Scrutiny Committee regarding the validity of the IIA. Officers have subsequently taken advice from the Head of Legal & Democratic Services who has confirmed that the IIA statement relating to disabled persons is correct as the statement is only detailing a change in the tariff structure and not a change to policy.

The decision by the authority to charge blue badge holders was taken previously and is not a change to the current arrangements in place. Notwithstanding this the IIA has been changed to recognise that there may be a low impact for disabled blue badge holders using the authority's off-street car parks.

## Valleys Communities Impacts:

No implications.

#### Workforce Impacts:

No implications.

### Legal Impacts:

Any changes to the Parking fees and charges need a Legal Order to be advertised that allows for any objections and observations to be reported back to the Environment, Regeneration and Streetscene Services Scrutiny Committee and Cabinet Board before a final decision is implemented.

#### **Risk Management Impacts:**

Members need to be aware that there is a risk element to the change in tariff structures should members of the public choose to find alternative parking, this could result further budget pressures, which will be reviewed in 2024.

### Consultation:

Consultations will be undertaken when we formally advertise the changes to the off-street car parking order and on-street traffic orders.

The Town Centre Manager will liaise with traders within the town centres of Neath, Port Talbot and Pontardawe with regards to the 5 free days parking proposed if agreed.

#### **Recommendations:**

Having due regard to the amended first stage Integrated Impact Assessment it is recommend that members agree:

#### **Option 1 On-Street Parking Permits**

That the proposed £5 increase across all on-street permits set out in the circulated report be implemented with the exception of care worker permits which will become free of charge.

That charges are introduced for individual disabled parking permits (IDPP) in line with the cost of other on-street permits.

It is proposed that in future years all permits will be increased annually in line with inflation.

**Option 1b Off-Street Car Parking** 

Implement the proposed increase across all tariff structures except for all day parking as set out below.

 Up to 1 hour £1.75

 1-2 hours
 £2.30

 2-3 hours
 £2.85

 3-4 hours
 £3.30

 All Day
 £3.80

### Option 3 Pontardawe Car Parking Charges

That the off-street car parking charges in Pontardawe apart from the first hour free be brought into alignment with Neath, Port Talbot town centres for all tariff bands as set out below:

Free
£2.30
£2.85
£3.30
£3.80
£1.00 all day

**Option 4 Season Parking Permits** 

Implement the revised charge for season parking permits as set out below:

1 month - £75.00 3 months - £200.00 6 months - £300.00 9 months - £400.00 12 months - £500.00

That the benefits of purchasing a season parking permit be marketed and advertised to make people aware of the savings available.

### Option 5 Free Christmas Car parking

That free Christmas car parking cease and that 5 free days of parking be offered Neath, Port Talbot and Pontardawe town centres individually and implemented by parking services following consultation between the traders and the authority's town centre manager. That free bus travel over the Christmas period as outlined in the circulated report is not practical, as the parking account cannot be relied upon as a guaranteed income stream to fund the initiative.

Members note that bus subsidies will be considered as part of the bus emergency scheme currently being reviewed by Welsh Government, Transport for Wales and local authorities in terms of affordability.

### Option 6 Seafront Off-street Car Parks

It is recommended to alter the charging times in the seafront car parks from 07.00am to 22.00pm to 08.00am to 20.00pm and be implemented at the end of the current peak period in October 2023.

The proposed date for peak period charging be changed to 1<sup>st</sup> April until 30<sup>th</sup> September be implemented in April 2024.

That the proposed charge for all day parking from 1<sup>st</sup> April until 30<sup>th</sup> September be £4.00 and from 1<sup>st</sup> October until 31<sup>st</sup> March be £2.00 be implemented in October 2023.

### Option 7 Seafront On-street charging

That the proposed charge of £1.00 per hour up to a maximum stay of 2 hours be introduced in the on-street limited waiting bays at the seafront from 1<sup>st</sup> April to 30<sup>th</sup> September be implemented in April 2024.

It is recommended that the new charging times mirror those in the seafront car parks i.e. 08.00am to 20.00pm to align with enforcement operational hours.

That there will be no charge or time limit in the on-street seafront limited waiting bays from 1<sup>st</sup> October until 31<sup>st</sup> March.

# Additional Recommendations following the Special Environment, Regeneration and Streetscene Services Scrutiny Committee

- 1. When the legal orders are advertised to change the off-street car parking order and on-street traffic orders, residents and businesses will have the opportunity to raise any objections which will be brought back to a future meeting for Members consideration before any changes are implemented.
- 2. That subject to available funding, a feasibility study could be undertaken to review the operational hours of the Neath pedestrianised zone which will be considered against all other priorities within the Highways Capital Programme or as suggested by members any other regeneration grants that become available which would be subject to a future report to members.
- 3. That a review be undertaken in October 2024 six months after all recommendations have been fully implemented during April 2024 to allow time for measureable data to be obtained over the summer period.
- 4. That a Visitors Parking Permit that would cover all car parks and attractions in the county (to include country parks), be explored further in conjunction with the country parks management.

# **Reasons for Proposed Decisions:**

The new fees and charges seek to address the outstanding maintenance issues in the authorities' car parks and to reducing the inyear budget pressures within parking services. Ensuring our car parks remain operational allowing our local environment and amenities to be enjoyed by future generations. **Implementation of Decision:** 

The decisions are proposed for implementation after the three-day call in period.

# **Appendices:**

Appendix 1 Integrated Impact Assessment Screening. Appendix 2 Scrutiny Task and Finish Report

## List of Background Papers:

None.

# **Officer Contact:**

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