

“Just like That!” – making the parking problem of Hebden Bridge disappear!

The Garden Street Action Group investigates the 'parking problem' of Hebden Bridge, and finds out that, if it actually exists, the solution is instantly to hand.

...And discovers hundreds of additional short-stay parking opportunities available in better locations, at no cost, and immediately (or within a few months) – ‘Just Like That!’

So: we don't need a new multi-storey car park – and all the hugely controversial associated development - at all!

Calderdale Council: Please take note.

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Introduction

1. In just a few weeks time Calderdale Council is due to determine planning application No: [07/01409/OUT](#) for a very large mixed use development in Garden Street, Hebden Bridge – ‘comprising car parking, pedestrian and vehicular access, residential accommodation, retail/commercial space, ancillary and servicing facilities (including demolition of existing retaining wall’. On a site which it owns; for which it prepared the development brief; and for which it has already entered into a development agreement which it refuses to make public. The only thing we do know is that, once the Council approves planning permission, it has already legally obligated itself to hand over the site to the developer. And that will be that.

2. This justification for this development is that it is meant to be providing more public parking for the town. The site is already the largest surface level car park in Hebden Bridge; but because the multi-storey provision proposed – now to be located in two basement levels - cannot possibly pay for itself, then very large amounts of associated commercial development has also to be added to make the scheme pay. And that is where the controversy begins.

3. The scheme has provoked a huge wave of objection, in the town and beyond, for various reasons: that it won't provide many more public spaces; that the scale of commercial development is excessive; that the impact on the Hebden Bridge Conservation Area will be adverse; that the prolonged development of this very difficult site will damage the town economically.

4. But ... **can the scheme be justified on parking grounds?** If it can't, then surely Calderdale Council should withdraw its support.

A). Is the Garden Street multi-storey, on its own, an answer? How many more public spaces will it provide?

5. From the start, the Action Group have long pointed out the fact that – despite the then Leader of Calderdale Council Cllr John Ford's promise on 16th February, 2004 that the multi-storey car park development the Council was promoting would: **'solve the parking problem in Hebden Bridge once and for all'** – it won't actually provide many more additional public parking spaces and also that there were in fact far easier opportunities to provide more spaces elsewhere around the town.

6. To understand this point we need to draw a very clear distinction between additional **public** and **private** spaces (the latter providing parking for the additional housing, which in turn is paying for the additional public spaces! In the Garden Street development there will be 160 spaces in total) - something which supporters of the scheme sometimes manage to confuse. And also compare two options, something that Calderdale Council has never done:

Option A) Maximum use of the existing surface level car park: = 58 in main car park + 12 in Tan Pit Yards (*Developer's Design & Access statement para.12.8*) = **70 public spaces** in total.

Option B) Multi-storey + associated development: = Basement Level 1 - 50 spaces + Level 2 - 51 = **101 public spaces**. But don't include 8 'public' spaces under commercial Block F, because these are required for the office development above (in accordance with UDP parking standards T18), and also the access is not suited to short stay use.

7. So: 101 minus 70 = just **31 additional public spaces** in the multi-storey option, not allowing for the new demand created by the additional shops also being provided. This small increase, just 7% of the town's parking stock - once the new Station Road car park is provided shortly - certainly does not live up to the Leader of the Council's promise; and in any case we can easily find many more than 30 additional public parking spaces, immediately and easily, and without the huge disruption and risk of the Garden Street development. As this report will now show.

B). The strategic framework for parking in Hebden Bridge

8. The Action Group believes that if anyone - whether they are the developer, Calderdale Council or objectors - wants to argue that the town either needs or doesn't need more public parking, then they have to answer three questions:

Q1 - Is there a shortfall on public parking, substantiated by quantified evidence? This question would be answered by undertaking surveys of parking use, relating capacity/supply to parking demand. This will allow decision makers to understand the actual extent of a capacity shortfall, if any, and when and where it is located.

Q2 - If there is, should that need be met – because it may not be sustainable to do so? This question needs to be answered by understanding how requests for additional parking fit into the national, regional and local policy frameworks.

Q3 - And if there is a shortfall, where and by what means should it be met? Parking demand should be met by an optimum combination of at least five factors: additional physical spaces; location of spaces; regulation by pricing; regulation of length of stay; and better signage & public information. All options have to be combined and tested to find the best solution.

9. **The Action Group has answered all three of these questions, and this report presents our evidence.** But neither the developer or Calderdale Council have answered any of them; and therefore the developer has no evidence to support their claim that their development will be "tackling the town's desperate need for additional car parking facilities" *Developers publicity leaflet July 2008.*

10. The developers own Transport Statement (volume 1) conveniently brings together some of the policy guidance. PPG13 states that the Government overall objectives for transport include: "to reduce the need to travel, especially by car" *para.4*. As instructions to local authorities when 'considering planning applications', it states they should: 'use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys' *para.7*

And here is the general guidance PPG13 provides on parking issues *para.49*: "The availability of car parking has a major influence on the means of transport people choose for their journeys. Some studies suggest that levels of parking can be more significant than levels of public transport provision in determining means of travel (particularly for the journey to work) even for locations very well served by public transport. Car parking also takes up a large amount of space in development, is costly to business and reduces densities. **Reducing the amount of parking in new development** (and in the expansion and change of use in existing development) **is essential**, as part of a package of planning and transport measures, to promote sustainable travel choices." *Our emphasis*

11. Of course, if the **total** number of parking spaces (public *and* private) in Hebden Bridge is increased by the Gardens Street development by 90 – from 70 to 160 - then that must also

generate more car movements in and out of the town, and additional car trips often from quite distant places.

We believe it should be difficult for the local planning authority to argue that a development – particularly one which the Council itself is promoting – that is expanding the parking stock of a small town by 90 spaces in total, is consistent with all this government guidance – particular when, as we will shortly demonstrate, none of this physical expansion of spaces is needed at all.

12. What about air pollution? In August 2006 Calderdale Council declared an Air Quality Management Plan across the centre of Hebden Bridge and focussed on the A646 road corridor, very close to the development site. The Draft AQMA Action Plan of February 2008 reported that there was a breach of air quality standards (NO₂) in Hebden Bridge and that “the excess of NO₂ over the local background level is assumed to derive mainly from vehicular traffic”. The Assessment report of September 2007, which was aware of the multi-storey car park proposal (p.25) and placed it and related development pressures within UDP policy EP2, concluded: “Attention must be given to careful consideration of planning development in or near to the AQMA and to strengthening the council’s current policy in this respect.” p.26

13. So one part of the Council is concerned to reduce the amount of road traffic in Hebden Bridge, which will be increased by development schemes (particularly large ones), whilst another part is active promoting a road traffic generating scheme in the centre of the town.

14. At a regional level, the new Regional Spatial Strategy (now automatically part of the local plan) states that its primary objective is to: “reduce travel demand, traffic growth and congestion, shift to modes with lower environmental impacts and improve journey time reliability”. Again, a substantial increase to parking spaces in Hebden Bridge would be contrary to that policy.

15. Within the Calderdale UDP, it cannot be argued that the provision of a very large expansion of total parking spaces in a small town like Hebden Bridge is consistent with core policies GT1 and GT2. Indeed it states, correctly: “Car parking provision is a tool in the management of travel demand and traffic congestion.” *para.9.16* And of course, it isn’t as if the Garden Street development is the only scheme in and around the town proposing to add more parking spaces and therefore generated traffic (and congestion). It’s as if the cumulative parking/traffic consequences of all these developments isn’t being assessed by the Council (answer: it isn’t).

16. Locally, the town has benefited from a highly successful Traffic Review, now almost completed implementation, which had two primary purposes: (i) to make a slight shift towards more sustainable travel – with a little less reliance on the private car, and a little more on public and active transport (cycling and walking) - and to provide an overall parking strategy for the town, achieved by the right mix of the measures identified in para.8 BP3 above. The Action Group believes that the Traffic Review has been a great success – which is also a success for Calderdale Council which undertook it; and it has received a number of awards - and that the key to resolving any parking problems in Hebden Bridge lies in continuing to implement the parking strategy that the Traffic Review devised. All our proposals are consistent with that strategy.

C). Is there a 'parking problem' in Hebden Bridge?

17. The only way to start to answer this question is to undertake surveys of parking usage across all of the town:

- **the Action Group has done this – in July 2008.**

- the developer doesn't appear to have ever undertaken such surveys, and certainly hasn't included these in its current revised application. They do include however an important survey of the use of the existing Garden Street surface car park in June 2007

- Calderdale Council hasn't undertaken any surveys since the start of the Traffic Review, about 5 years ago and, as they prepare to determine the current planning application, therefore have no up-to-date figures for the current relationship between parking supply and demand, after all the changes made by implementing their own Traffic Review.

18. The results of the Action Group surveys (see the spreadsheet available on our website) are as follows:

- They were undertaken at the end of July, generally in very good weather, so that a reduction in 'general' parking that might be expected at this time of year as people go on holiday was to a considerable extent counterbalanced by buoyant visitor demand, particularly at the weekend.

- They reveal a parking situation at a period of particular stress: when some of the spaces 'removed' by the Traffic Review have yet to be reinstated; when specifically the implementation of the Town Council's new 39 space long stay car park in Station Road – which already has planning permission and funding - has been held up by a minor legal matter with Network Rail; when visitor demand is probably approaching its peak; and when the two market days on Wednesdays and Thursdays result in the non-availability of the 31 space Market Place car park rather than the 17 space Lees Yard car park to which the market is planned to be transferred.

- Nonetheless, even in these stressed circumstances, parking **space** utilisation peaks on average at **85%** weekday lunchtime (or **90%** Market days), generally with spaces available before and after the lunchtime peak); and at **91%** weekend lunchtimes. If the new Station Road car park had been available during the survey period, then the utilisation % would have dropped to about **75%** weekdays (about **82%** Market days) and **84%** weekends respectively. Free spaces even at peak times were available in a variety of locations, where residents, but not visitors, might know about. In the weekday off-peak, utilisation would average between 50-75% once the Station Road car park is provided.

- The surveys also show that utilisation of the large 81 space car park at Hebden Bridge Railway Station – full with commuters during the week, but unenforced at any time – is only around 50% at weekends, and is already being used by knowledgeable visitors then as an overflow car park. Observation revealed as well that the very large car park at the Valley Road industrial units (capable of taking around 40-50 cars) was completely empty at weekends, when the units themselves are also closed. Additionally, there are other smaller potential parking opportunities in this part of the Hangingroyd Lane area, already the largest concentration of parking spaces in the town.

- So, as a result of undertaking these surveys, we can see that the actual parking situation in Hebden Bridge - as at July 2008 - can be summarised as: '**Tight and approaching capacity**' at peak times (weekday or weekend lunchtimes) without the new Station Road car park, but then '**Adequate**' once it is provided; otherwise '**More than adequate**' in the weekday off-peak. There are also considerable and realistic opportunities for substantial additional parking provision to cope with the weekend or summer visitor peaks.

19. The surveys therefore show that the developers claim that Hebden Bridge has a 'desperate need for additional parking facilities' is **not supported by the evidence**.

D). Are there opportunities for additional parking in Hebden Bridge?

20. The Action Group surveys – the only ones undertaken of Hebden Bridge – have therefore already undermined the case for additional new physical parking spaces. But nonetheless there are different types of parking problem that need to be solved. And, within the framework of a sustainable transport policy, there may be opportunities for additional parking – particularly to suit the short stay needs of residents, most visitors, and in support of the town's retail businesses – should these be decided upon. To respond to this situation, the Action Group is able to announce with this report that **it has identified a huge potential to provide such additional short stay parking opportunities – both weekdays and weekends – which do not require any physical addition to the number of parking spaces** (with the exception of the actual implementation of the Station Road long stay car park, already approved); which can be made available immediately or within a few months; and which require virtually no expenditure – apart from that for a few new signs and road markings!

D1). Opportunities for additional short stay parking during weekdays

21. In looking for these opportunities, the Action Group worked within the following criteria: (i) the additional parking opportunities should in particular be available for short stay use by residents, visitors and in support of the town's retailers; (ii) they should be available very quickly, flexible, cheaply and in the right location; and (iii) they must contribute to and built on the parking strategy recently devised by Calderdale Council as part of the Traffic Review.

22. In fact, the Traffic Review; the decision already taken by the Town Council and Calderdale Council to provide the long stay Station Road car park; and ironically information within the developers' own Transport Statement (volumes 1 and 2) – provide all the preconditions and information necessary to identify a very large number of short stay opportunities.

23. In Transport Statement [volume 1](#) paragraph 7.2 the developers' consultants Gifford describe what their June 2007 surveys of the use of the existing Garden Street car park demonstrate. We quote two key findings:

- "Overall the car park is operating much more as a long stay car park with 60% staying more than two hours and only 40% using it as a short stay car park".
- "During a normal weekday, the most frequent duration of stay is less than 30 minutes with 50% of the vehicles being parked for under 3 hours 30 minutes."

24. These findings are drawn in turn from the detailed findings of Appendix D in Transport Statement [volume 2](#) (p.13pdf for Saturdays, and p.15pdf for weekdays), which record the build-up of Garden Street car park usage during the day ('accumulation'), and length of stay by vehicle ('parking duration'). What these show is that:

- **Accumulation:** during the weekday, Garden Street approaches (but does not completely reach) its full capacity only at lunchtime – there is spare capacity before and after – from which we can infer that, since it is the largest single car park in the town and a 'destination' car park, that there must also be spare capacity in the town as a whole, otherwise frustrated parkers would head for Gardens Street and fill it up. During summer weekends however (but not necessarily at other times of the year), full capacity probably extends across the middle of the day.
- **Parking Duration:** an analysis of these figures reveals that 32% of the total number of cars parked on weekdays stay in Garden Street for longer than seven hours, occupying more than

half (52.3%) of the available parking hours. Even at weekends, when this long stay use of spaces presumably by employees is likely to be reduced, it still represents 27.6% of available parking hours.

25. The Action Group agrees with this data and the consultants findings, which are confirmed by our own surveys. But we disagree with the consultants, or the developers, response to them. They state:

"The proposed new car park **will operate in same way** [sic] as the existing Garden Street car park, in that will be possible **to stay all day** at a charge of 30p/ hour on a Pay and Display and **there will be no split between long and short stay use.**" *our emphasis, Transport Statement vol 1 para 7.2*

26. In other words, the developer intend to build a hugely expensive new car park at the heart of the town centre – with a relatively small addition to the number of additional public spaces – and then fill it indiscriminately with short and long stay uses, at an hourly charge already 20p below the two other town centre car parks experiencing substantial usage (Bridgeway and Lees Yard).

27. The Action Group's response to this survey data is completely different. What it reveals instead is an opportunity to **immediately** resolve a major problem during the week, and even at weekends; and do so in a way which follows the core approach of the Traffic Review parking strategy, which is to segregate by location the short stay parking opportunities (in the town centre itself) from the long-standing ones (slightly further out). This, of course, is a completely orthodox approach to making the most efficient use of both car park locations and spaces. It would involve requiring the minority of cars in the car park staying for 6-7 hours or longer to park somewhere else (but still nearby), thus making more than half the parking hours in the car park instantly available for use by short stay residents and visitors.

- If the 220 hours occupied daily by long stays over 6 hours are transferred to another location, this would immediately make available over 100 short stay parking opportunities (up to 2 hours) for residents and visitors in the heart of the town, every single weekday.

- And similarly at the weekend, it would make available nearly 75 short-stay parking opportunities, on Saturdays and Sundays.

- These opportunities can be made available **immediately** by the simple imposition of a 'Maximum Stay – 6 hours' regulation on the use of Garden Street (turning it from a long stay to a medium stay car park). And the cost of a new car park sign.

28. There is only one prerequisite for this to be possible, which is that there would need to be sufficient long stay parking spaces for a smaller number of cars within relatively easy walking distance of this part of town. And fortunately, there are not one but two such locations: the Town Council's long stay car park in Station Road (39 spaces; charge – understood to be £2/day), which is in fact the key to unlocking all the parking opportunities in the town; and then a reassigned Tan Pit Yards, already zoned and used for car parking, which both the Action Group and the developers agree can provide 12 spaces – in total therefore over 50 long stay spaces; much more than enough. The relocation of these long stays away from Garden Street might be assisted by an increase in the Garden Street charge from 30p to 40p per hour, should this be appropriate.

29. So, with just one instant regulatory change - in turn dependent upon the provision of increased car parking of a different sort and at a different location; fortunately already

approved – **the Action Group has made not just the Garden Street but in fact the town's alleged 'parking problem' substantially disappear: 'Just like that!'** This has come about because we did not limit the sorts of solutions we were considering simply to additional physical new spaces – which are the apparent obsession of both Calderdale Council and the developer - but instead considered the full range of other parking measures including segregation of short/long stays; regulating length of stay; different and more appropriate location; and pricing.

30. We would assume that the developer's transport consultants understood this potential immediate solution to the town's 'parking problem' but did not express it. As for Calderdale Council, the question must be asked: 'Why has the Council chosen to ignore an obvious solution suggested by its own parking strategy for the town, and which is instantly available to it?'. We would hope that this is not because it has been focusing its attention on the development potential of its own site instead.

D2). Opportunities for additional parking for visitors on summer weekends

31. The Action Group's parking surveys have revealed that there is a particular parking capacity problem to address, to cater for increased visitor flows, during summer weekends: that is, some 44 days between April-August. There is no point in making additional physical parking capacity permanently available throughout the rest of the week and the year if there is only a need during the summer peak; and it would also generate additional demand across the year. Our surveys revealed two locations for substantial summer weekend overflow parking, which are immediately available without any physical works being required:

(i) using the existing Station car park, which because of the absence of enforcement is already used by motorists informally as an overflow. Our surveys showed that typically this has 30-40 spaces available.

(ii) There are a number of opportunities in the Valley Road area, but especially at the Industrial Units where during the period of our survey some 40-50 spaces were standing completely empty. This is because the units do not trade over the weekend. If the site owner was prepared to make the spaces available the income could be shared, with Calderdale Council responsible for enforcement.

These 'dual uses' of existing spaces would be consistent with PPG13 para.51/3

32. And then, in addition, there is still the opportunity for parking capacity at the Rail Station to be substantially enlarged – to provide for increasing numbers of rail commuters; more long stay provision for the town but away from the centre; coach parking; park-and-ride; and so on. The continued failure of Metro/Network Rail to bring forward proposals for this is a real disappointment, and they need to be requested to start making progress as a matter of urgency. However, the provision of these spaces is not essential for the parking solutions recommended in this report.

D3). Other suggestions for improved parking

33. In addition to the two critical changes – immediate provision of the long stay Station Road car park; and, once that is available, the imposition of a 6-hour maximum stay on the existing Garden Street surface car park; the Action Group would also suggest the following measures to improve parking availability in the town – should this be consistent with demonstrated need and overall sustainability:

- make the Council owned Stubbing Holme Council owned car park (at present without charge and therefore inefficiently used) a charged-for short stay car park like others in Hebden Bridge,

and providing needed spaces in support of retailers at the west end of town. This will provide another 17 public spaces.

- pressurise Metro into bringing forward proposals for making the Rail Station area the transport hub and interchange for the town, bringing together increased car parking – dual use both for commuters (during the week) and visitors (weekends/summer) – coach parking, bus interchange and specific park-and-ride e.g to Hardcastle Crags
- mark out individual on-street spaces in the town centre (not marked at present) increasing the availability of spaces.
- improve the signage for car parking, particularly to weekend overflow car parks
- improve also the town's car parking leaflet, to be available in all shops and other locations; and make available some online guidance on the Internet.

D4) Suggestions for more sustainable transport

34. Unlike the developers, the Action Group does not believe that the future transport needs of Hebden Bridge, and its important visitor market, can or should be met just by ever-increasing the number of cars travelling to, and parking in the town. (The developer has frequently said: 'Just tell me how many more parking spaces you want, and we can provide them'). This is the exact opposite of what the Traffic Review was attempting to do: to maintain a balance between car and other modes of transport, and shift that balance slightly in the latter direction.

35. That is simply not sustainable; it does not acknowledge even the existing levels of traffic congestion on the A646 – the road artery of the Upper Calder Valley - and the need to reduce not increase traffic air pollution; it is not consistent with all government policy on transport and climate change; it does not recognise the profound shift in the price of petrol and car travel taking place before our eyes; and, we believe, it is not what the Hebden Bridge community and its traders want.

36. It is a voice from the past. We are looking to the future.

37. Despite the difficulties always involved in attracting visitors by public transport, the town and its visitor market will need to focus on markets accessible by bus and train, and indeed make a virtue of higher car costs and our excellent rail connections. So we suggest – consistent with and building on the overall direction of the recent Traffic Review:

- much more provision for cyclists (cycle stands and lockers; and more information about these)
- more promotion with Hebden Bridge's innovative '[Walkers are Welcome](#)' group and website, to encourage access by public transport.
- better promoted and more closely monitored integration between train and bus services at the rail station.

E). And finally – what has Calderdale Council got to say about all this?

38. Well, let's see. In *public*, we think ... **precisely nothing!** For the past few years, as the Garden Street development scheme has been making its way through the Council and now the planning process, Calderdale Council* has undertaken no published work on the parking need for the scheme, or maintained any kind of direct dialogue with the community about its

development plans.

39. With one exception. There was a public consultation held in February-March 2005 on the three schemes bidding for preferred developers status, with the following questions:

Q1 Do you like the design of the development? **A: No – average 60+% across all 3 schemes**

Q2 Do you think the proposal reflects the character of Hebden Bridge and its conservation area? **A: No – average 55+%**

Q3 Do you think the proposal relates well to its immediate surroundings and neighbouring buildings? **A: No – average 55+%**

Q4 Do you think the proposal makes the best use of the site in general? **A: No – average 50+%**

Q5 Do you think the development will be of positive benefit to the town? **A: No – average 50+%**

40. With, as it happens, a previous version of the current developer's scheme scoring worst for 4 out of 5 questions; but the more important point is that *all* schemes were rejected in this public consultation. 'Yes' answers ranged between 10-20% for the 3 schemes.

41. So the Hebden Bridge community view (reflected in the consultation) rejected the concept of the development outright; so the Council proceeded to ignore that view!

42. And in *private*, what has the Council said about parking on Garden Street?

- CMBC Development Brief for Garden Street May 2004: 'There are currently 42 public car parking spaces on site ...' *para.3.3* **WRONG!**: There were 55 spaces at that time, and there are now 58. Additionally there were also 'public' parking spaces on the subsidiary Tan Pit Yards site as well, capable of providing 12 spaces. So the development brief understated the existing parking capacity of the development site by 28 spaces or 60%.

- '... and it is proposed that the provision of public car parking is significantly increased.'
Para.3.3 'A minimum of 60 spaces should be allocated for short-term public parking (less than 4 hours)' *para 8.1.1* **BUT!**: 60 spaces was *less than* the number of public spaces already available on the development site at that time! So, in fact, a false target.

- 'The Hebden Bridge Traffic Review identified that central car parks such as Garden Street should be primarily short stay.'
para.8.1.1 **YES:** as the Action Group is now saying **BUT:** the developer is proposing it should remain a *long stay* car park.

We understand that the Development Brief may not have been publicly consulted on (as it should have been – it's not always easy to establish the facts); certainly its contents are not publicly well known, and are not publicly available.

- Highway Section comment on planning application March 2008: 'The development is to offer some 93 public car parking spaces. Further details of how these spaces will be managed is required. How they will be split in terms of long and short stay parking provision.' Those 3 sentences are the full extent of the comments on the public parking provision in the development. The last sentence indicates that the Council's parking experts are aware of the crucial nature of the short v. long stay regime on the site; it's just unfortunate that either before or after March 2008 they haven't undertaken the usage surveys or analysis that would have allowed them to advise their Council colleagues what the Action Group has now revealed above.

43. And ... Err ... **that's it**. So far as the Action Group is aware, that is the full extent of Calderdale Council's consideration of the parking issues relating specifically to Garden Street in the last 4 years; but we will be initiating a Freedom of Information search to see if there is any unpublished information that we can make available.

[* There are a number of different sections of the Council involved with the issue of parking in Hebden Bridge. The really excellent and award winning work of the Traffic Review, including all its other car parking proposals, has been undertaken by the Highways Section, who strangely have had little to do subsequently with the Garden Street proposals. This has instead been the responsibility of the Council's Regeneration section.]

Conclusions

44. This report by the Garden Street Action Group has demonstrated that:

- the scale of the 'parking problem' in Hebden Bridge has been greatly exaggerated by the developers, because they have not undertaken basic surveys or analysis;
- that there are many other solutions to parking issues in the town – more flexible, easily available and immediate – should we wish or need to increase capacity;
- that a simple regulatory change to the management of the existing Garden Street car park will make very large numbers of short stay parking opportunities instantly available (and that long stay parkers displaced will not be inconvenienced either); and
- that therefore the Garden Street development - if its purpose *was* to significantly increase public parking for the town - **is simply not necessary at all**. The expansion of parking in the development by the total amount (90 spaces) is not consistent with local, regional or national guidance.

45. The Action Group therefore calls on Calderdale Council to:

- **withdraw its support as site owner for this unnecessary development, which will inflict significant economic damage on the town and its businesses.**
- **take into account as local planning authority the findings of this report when it comes to determine the planning application for the development.**
- **if the Council, and the community, reach a conclusion that some expansion to parking supply is required – permanently or temporarily, and consistent with sustainability: to implement the regulatory change to the management of the Garden Street surface car park [change from long to medium (maximum 6 hours) stay] immediately the Station Road long stay car park is available for use by vehicles displaced from Garden Street.**

46. Right at the start of the Garden Street saga the Council's independent Traffic Review consultant said, about the idea of a multi-storey car park on that site then being floated, that:

'It is neither technically or financially viable' - and didn't support it.

If only the Council - and the few supporters of this development - had listened.