



Friends of Sir Joseph Hood Memorial Playing Field

67 Marina Avenue
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**Environment and Regeneration Dept
Merton Council**

By Email only:

trafficandhighways@merton.gov.uk

2nd July 2017

Dear Sir/Madam,

**Response to Parking Consultation
REF: ES/OFFSTREET
Proposed car park: Sir Joseph Hood Memorial Playing Fields**

We write further to the notice dated 15 06 17, made pursuant to part VI Schedule 9 of the Road Traffic Regulation Act 1984. Merton Council has given notice of intention to make Merton (Off-street Parking places) order 201, thereby revoking order (no 1) of 2013. Introducing parking controls at the off-street car park at the above location.

The contents of this letter represent the views of the membership of The Friends of Sir Joseph Hood Memorial Playing Fields (SJHMPPF), one of the parks referenced in schedule 1 of the above notice.

After consulting our membership, over 500 families, the unanimous response has been to object strongly to the proposed introduction of parking controls. We summarise our objections below:

1. First, we note that parking control consultations should be wide reaching and include all stake holders of the park and local residents. We refer you to Merton Council Parking Control website pages which set out details to be followed for informal and then formal consultations.

We produce a leaflet and questionnaire delivered to every property in the consultation area. The consultation document has specific information about the scheme and how it would affect residents. There are typical questions and answers relating to the operation of a parking zone. A prepaid reply card is also provided.



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The consultation document is produced in conjunction with any local Residents Association and the Ward Members. The document sets out the arguments for and against having parking controls, what it will cost and ask a series of questions that will help us deliver a scheme residents want.

As part of the consultation process, we display plans in libraries and may issue press releases in the local newspapers in order to ensure that all residents know how and where a consultation is taking place and where the exhibition will be held.

Exhibitions provide the opportunity for most people to visit and find out the information they require.

There is information about the design, types of control, why we charge for permits and for officers to take notes of residents/business concerns. It is important to remember that the exhibition is there for people to find out more about how a parking zone would work and to discuss their needs and concerns with officers.

If there is sufficient support for developing a scheme, we carry out a formal consultation on the detailed design.

An advert for the Traffic Management Order is placed in the local newspaper and posted on lamp columns in the area and the residents are informed of this via a letter. We invite anyone who is either in favour or against the scheme to make representation in writing. A deadline for representations is provided.

2. We are concerned that none of the above process has been applied in this consultation. Whilst we appreciate this is off-street parking, due process requires an adequate consultation for the resulting proposed order, if made, to be lawful. It appears the consultation has only been communicated to council members. Significant stakeholders such as The Friends of SJHMPF, Raynes Park Little League and other regular not for profit users of the park, have not received any notification whatsoever. The local residents in Marina Avenue have not been consulted and there has been no public notice displayed in or around the current off-street car park area. Questions have been raised by Councillor Gilli Lewis Lavender of West Barnes Ward for the Leader of Merton Council to explain why parking meters were installed in the car park of SJHMPF 12 months before the consultation was announced. We submit the outcome of the consultation has been predetermined and therefore any decision to introduce parking controls to the car park of SJHMPF, based on the current consultation, would be unlawful.



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3. We note from published minutes of council meetings that the reasons cited for introducing the controlled parking zone are to prevent commuters parking in SJHMPF car park, which in turn deters legitimate park users from being able to visit the park by car. We are concerned that there is little or no central knowledge as to effective parking controls already in place. For at least 12 months since new gates have been installed at SJHMPF, the gates to the car park on Marina Avenue (the only entrance to the park accessible by car), have been closed each evening at approximately 10pm and not opened until 9.30am each morning. The gates are currently opened to coincide with the licensee of the park pavilion soft play opening hours. By delaying opening the gates until 9.30am there is no commuter parking. This simple and reliable method of parking control requires no investment by Merton Council, no parking patrols and enables legitimate park users to continue to access facilities. We submit introducing and enforcing parking charges is not necessary to prevent commuter parking in the car park of SJHMPF. It is a disproportionate and irrational proposal.
4. Further to objection 3 above, if parking controls were to be introduced to SJHMPF car park, we consider simply by opening the gates before 9.30am, (the proposal is for hours of operation from 6am), the car park would become a commuter "hotspot". The proposed charges would not deter commuters but rather, we submit the car park will be seen as a cheaper alternative to more central parking in boroughs closer to Central London. The car park is a 3-minute walk to Motspur Park train station. The only sensible method of parking control is to continue with the current gate closure operations.
5. We consider introducing parking controls for SJHMPF car park would discriminate against the very park users Merton Council Greenspace strategy should prioritise. The disabled and children with families are identifiable as 2 separate groups of park users who require parking facilities to continue to use Merton green spaces. Driving to SJHMPF is not a choice but a necessity for those in the above groups who are unable to walk there. Introducing parking controls would discourage such users and restrict their current access to free greenspace. Such discrimination cannot be justified where there is no current need for parking control to facilitate their access to the park. As stated above, due to the gate opening times being restricted to after 9.30am, there is currently unhindered access for the above groups.
6. The regular licensees of the park such as Raynes Park Little League, a not for profit organisation and stake holders in SJHMPF since the 1960s, rely on the car park facilities for their football games on weekends throughout the year. Not for profit organisations, including The Friends of SJHMPF, raise the profile of Merton parks, invest in the infrastructure and work in partnership with Merton Council to improve the profile of the parks. Introducing parking controls will discourage the membership of the current groups from participating in group sports and community events in SJHMPF. This particular park has the profile of a sports ground, the users are diverse. Introducing parking controls will reduce numbers of park users and impact negatively on membership of key stakeholder groups, with the potential to cause an untenable decline in their membership.



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7. Finally, the local residents of Marina Avenue, the cul-de-sac down which access to the park is provided for cars, are concerned that introducing parking controls in SJHMPF will cause a further increase in unsafe parking in the streets in close proximity to the park. During peak times for park use, Saturday and Sunday mornings, unsafe parking along Marina Avenue can cause hazards including access issues which block traffic through to the level crossing on West Barnes Lane. We consider introducing parking controls for the car par of SJHMPF will result in first choice parking being pushed out further along Marina Avenue. Already a busy street backing on to the main high street, further parking congestion will be dangerous.

For the reasons above we submit the parking controls proposed are irrational, unlawful and unnecessary. There is no current commuter parking problem to address. The parking controls would disproportionately impact on the disabled and family users of the park at the same time as causing a decline in legitimate park user parking and activity.

Should you have any queries please do not hesitate to contact Ms Jane Pritchard on 07957 261053. We look forward to hearing from you with the outcome of the consultation.

Yours faithfully

The Committee

The Friends of SJHMF