

**ROAD TRAFFIC REGULATION ACT 1984 as amended**  
**LOCAL AUTHORITIES' TRAFFIC ORDERS (PROCEDURE) (ENGLAND AND WALES) REGULATIONS**  
**1996 as amended.**  
**SUFFOLK COASTAL DISTRICT COUNCIL**  
**THE SUFFOLK COASTAL DISTRICT COUNCIL (OFF-STREET PARKING PLACES) (VARIATION)**  
**ORDER 2018**

**STATEMENT OF REASONS**

**1.0 SCDC Current Off-street Car Parks**

The Council has for many years provided, maintained and managed a range of off-street car parks in a wide variety of locations across our area in order to support the retail and tourism economies of the District, and to ensure that residents and visitors alike are enabled to visit and enjoy the wide range of both built and natural attractions which our area offers.

Where appropriate, modest charges are made for this parking in such a way as to facilitate the best use of all of our car parks taking account of their varying locations, roles and facilities, whilst also providing the income needed to cover the costs of the service as a whole. Those costs include:

- Daily management to ensure fairness for all, with penalties for users who overstay the time for which they have paid, or who do not pay at all
- Ensuring that they are clean, lit and safe at all times
- Longer term replacement and maintenance, so as to ensure the quality of the service is able to continue in the long term at the level which the environment and the vibrant economy of our area deserves
- Provision for the service to expand as occasion offers or demands.

Penalties for parking without a valid ticket, or for other misuse of off-street car parks are imposed by SCDC via authorised Inspectors. The District Council retains income from enforcement penalties, which goes towards the cost of the service.

This service is currently operated under powers in the Road Traffic Regulation Act 1984 (RTRA 1984) and associated regulations.

**2.0 On-street Car Parking**

In contrast, on-street parking, i.e. parking on the public highway, is managed under separate highways-related legislation. Restrictions are made with Traffic Regulation Orders (TROs) made under RTRA1984 (yellow lines, bays) but enforcement is performed under the Traffic Management Act 2004 (TMA 2004). As well as a role similar to off-street parking in

terms of supporting retail and tourism, on-street parking regulations and policies have to cover issues around safety and congestion on the highway, commonly via provision and policing of single and double yellow lines, signage and similar measures.

Currently this service is managed by Suffolk County Council, as Highways Authority in terms of managing locations of parking restrictions, marking and signage of those, and any charges which may be made in some areas, although currently not in the SCDC area.

In contrast to District Councils' responsibility for off-street parking, policing of on-street parking is undertaken by the Police – the Suffolk Constabulary, via PCs, Police Community Support Officers (PCSOs), or in the past Traffic Wardens.

Parking inappropriately on yellow lines, and the other related issues above is a criminal offence, punishable by the issue of penalty notices, and enforced if necessary through the criminal courts.

However, changes to Police Service funding and priorities has in recent years led to a substantial decline in the level of enforcement for on-street parking, with an increase in illegal parking in some areas or locations.

### **3.0 The need for change**

Increased levels of what is commonly perceived as “abuse of yellow lines”, and related issues, has led to occasional congestion, sometimes dangerously, and safety concerns arising from that. Occasionally other issues such as parking across residential or other accesses or similar misuse of parking on the street or on footways have added to those concerns.

Accordingly there has been increasing widespread public demand, both nationally and locally, for a new approach with the aim of reducing, or eliminating if possible, those concerns around safety, access and the like.

This was recognised by government some years ago by the introduction of new legislation to allow the combined management of both off-street and on-street parking by a local authority with management and enforcement by a single team of officers employed by councils, rather than the police service. This would have the effect of streamlining management and enforcement of all parking issues.

This process is known as Civil Parking Enforcement (CPE). Civil Enforcement Areas (CEAs) are areas where the responsibility for on-street parking enforcement is transferred from the Police to local authorities. Of the 327 district councils in England, 25 are not designated as CEAs. Six of these 25 council areas are in Suffolk. No income is retained by Suffolk

Constabulary for current enforcement action, with all monies being sent to HM Treasury. An alternative model in which parking enforcement is transferred to local authorities and the income retained in the county, has therefore been proposed. It has now been agreed between the Suffolk District and Borough Councils, the County Council and the Police to proceed to introduce CPE across Suffolk as soon as possible.

The process for implementing CPE is however complex and time-consuming, with very significant time and costs attached to the production of the necessary detailed documents involved, not least in ensuring a precise alignment between the documents providing that given locations are subject to parking restrictions (known as Parking Orders), and their correct identification on the ground by lining and signage. The setup costs are estimated at £1.39m for Suffolk as a whole, with £10,000 to be borne by each District including Suffolk Coastal and Waveney Councils, and £190,000 by Suffolk police.

Beyond those introductory costs, there is expected to be an on-going net cost in the enforcement of CPE, in particular relating to on-street parking, where it is not expected that revenue raised by penalty notices will cover the costs of the necessary inspection and enforcement regime. That is despite the efficiencies arising from the on and off street regimes being combined under a single work force for Suffolk Coastal and Waveney District Councils. This cost is estimated at £240,000 per annum, shared between SCDC and WDC. The District Council retains income from enforcement penalties for both On and Off street parking under the CPE regime, which contributes to covering the costs of the service.

#### **4.0 Covering the costs of CPE**

The Council has recently carried out a public consultation on how the cost of CPE can be covered, and how the role of car parks in our District could be improved. We have also listened to comments made in the context of a recent Cabinet paper on this.

As outlined above, there are major costs in introducing and subsequently managing this new CPE regime. These costs will be minimised so far as possible for SCDC in that we operate a joint car parking service in conjunction with Waveney District Council, provided by Norse Commercial Services.

Nevertheless it is necessary to ensure that these costs are covered by revenue from the parking regime, so as to prevent additional cost to Council Tax payers as a whole via the Councils' normal budgets. This is the case not least due to the constantly increasing pressure on those budgets arising from continued reductions in government funding to local councils, combined with many other new demands for services, and the need to maintain a high quality of service for all that we do for our communities in many areas of public services.

Accordingly, it is proposed to introduce a modest increase in our off-street parking charges sufficient to cover:

- a) On-going costs of management and enforcement of car parking to a high standard, both on and off street
- b) To contribute to the high initial cost of introducing CPE
- c) A partial element of inflationary increase since the last district-wide increases in 2010 or 2012, so either 8 or 6 years prior to commencement of the new charges in April 2018 – a considerable period.

Following consideration of results from the recent consultation:

- The small number of free 30 minutes spaces in the town centre car parks in Felixstowe and Woodbridge will remain, so as to continue to attract “single purpose” visits by users to the town centres. However particular attention will be paid by inspectors to reduce blocking by users waiting for these spaces.
- The 3 currently free car parks in Felixstowe will not have charges imposed under the CPE regime, due to their specific circumstances of location or their role in reducing pressure on nearby streets or other car parks.

The proposed charging tariffs are attached. These have been designed to continue SCDC’s successful policies in using various rates of charge, in different locations within

- a) our town centres, both the major towns of Felixstowe and Woodbridge, and our wonderful smaller market towns
- b) resort areas and
- c) countryside

so as to:

- make best use of the limited spaces available,
- to encourage users to park in the most appropriate places according to the length of their stay (such as avoiding critical crowded town centre car parks being used all day by commuters, but keeping them available to visitors on shopping trips), while providing convenient spaces elsewhere for people working in the town centres to park for the entire day, and similar concepts in seafront areas and other contexts
- to make sure that we are able to continue to invest in both existing and possible future car parks
- and thus to ensure the car parks serve as effectively as they possibly can their role in making our area a great place to live and to visit, for both local people and our visitors from all across the UK and beyond.

There will be no increase in charges at Wickham Market, Leiston, Framlingham or Sizewell Beach.

## **5.0 Parking at Landguard in Felixstowe**

The tourist and visitor offer at the Landguard Peninsular in Felixstowe, and the preservation and enhancement of both the Historic and the wide variety of Nature Conservation assets has been improved greatly over the past 10 years, under the guidance of the Landguard Partnership (the LP).

The LP was set up in 2008, enabled by a substantial annual income from the Port of Felixstowe (the PoF) under the “Section 106” Planning Agreement (“S106”) with PoF in connection with their Felixstowe South Reconfiguration – the building of the new “Berths 8 & 9” terminal. The Café and Visitor Centre were also provided at the cost of PoF, and further land for Car Parking was provided. The LP employs a full time Partnership Manager, a part-time nature ranger and a part time publicity and events officer.

However, the original S106 funding was for a 10-year period which expires in 2018. The PoF have recently agreed to provide a further commitment to transitional funding of £25,000 p.a. for the 4 years from 2018 to 2022. However, thereafter the LP will have an annual income shortfall of approximately £40,000, net of contributions from a profit share agreement with the Café.

The ongoing future of the LP is critical to the continued guardianship and enhancement of Landguard. That continuance is in turn dependent on new sources of funding. Suffolk Coastal District Council (SCDC) recognises that the Landguard offer requires increased funding to develop to its full potential as a major visitor attraction. Some 250,000 car visits are recorded as visiting the area annually. SCDC holds a head lease from the Port of Felixstowe and has permission to implement car park charging.

SCDC has for a long time operated the car parking service to benefit the District as a whole and has set car parking charges to influence local parking patterns to benefit the immediate area and to cover the costs of parking related services including enforcement, maintenance, cleaning and lighting. Introducing a modest charge under the proposed new regime at Landguard is likely to raise more than sufficient for these purposes. It is therefore intended that this net revenue can be used in the future to help support Suffolk Coastal District Council's increased financial commitment to the partnership and the continued management and enhancement of Landguard, including providing resources to fund bids for major third party funding, possibly via the Heritage Lottery Fund. In summary, we wish to continue to encourage as many people as possible to discover and visit Landguard, so free parking will remain for short stay visits and for longer stays modest car parking fees will be introduced to enable support for the continued stewardship of the area.

The plans for the Landguard area are therefore included with necessary updates in the proposed Orders.

## **6.0 Other specific Issues**

The opportunity is being taken to deal with a number of other issues specific to a locality or in other ways. These include:

### **6.1 Residents' Off Street Season Ticket Discounts**

To discontinue Resident Off-Street Season Ticket discounts. These were introduced historically for specified addresses that had no off-street parking when car park charges were first introduced in car parks that had previously been free. In the current climate it is not thought acceptable to subsidise people who have chosen to buy a property without parking at the expense of others.

### **6.2 Filming Permits**

Applications for Special Filming Permits are enabled. Suffolk as a county is encouraging filming and the crews have requested a standard process to enable them to come onto the car parks.

### **6.3 Felixstowe Pier Plaza**

The Parking Order for this area, previously known as Leisure Centre Forecourt is removed - as this area no longer provides parking following the Pier redevelopment. This process is however not yet fully complete, provision is being made for deliveries and servicing to the Pierhead and Leisure Centre Buildings, and the car parking lines are to be removed.

### **6.4 The Avenue car Park Woodbridge**

The plan of "The Avenue" car park, Woodbridge is amended – the car park has been enlarged as additional capacity is required in Woodbridge. This will go some way to easing the issue but will not totally solve it and other solutions are also under consideration.

### **6.5 Slaughden Road Aldeburgh**

Pay and Display tariffs are to be introduced at Slaughden Road - to contribute to the revenue required to cover the anticipated deficit from Civil Parking enforcement plus provide some revenue to help with the maintenance of the road which is gravel and often suffers from large pot holes.

### **6.6 Campsea Ashe**

Campsea Ashe (Wickham Market railway station) Car Park is added to the order to enable enforcement of a maximum stay of 18 hours. Some vehicles are parking there all week while the owners are commuting to London.

### **6.7 Bawdsey Picnic Site**

Pay and display tariffs are introduced at “Bawdsey Picnic Site”. These very low tariffs have been requested by the Parish Council to provide some revenue to help with maintenance of that area.

### **6.8 Darsham Railway Station**

The car parks called “Darsham Station West” and “Darsham Station East” are added. Darsham Railway Station is located on the west side of the A12. There is a free car park owned by Greater Anglia, the train operating company, located on the east side of the A12. There is no pedestrian crossing and people have to cross the busy A12 from the car park to the station. Two elderly people were killed a few years ago attempting to cross the road. There has been an upgrade to the lighting but there is still a serious concern about safety. Both car parks will become Pay and Display and the revenue (after deduction of costs) from the new car park (Darsham West) will be shared between SCDC and Darsham Country Centre (a registered charity) as owners of the land concerned.