

2018

# East Suffolk Area Parking Plan

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## Executive summary

Requests to “do something about the parking” must be one of the most frequent requests Councillors get in their mailbags. In Suffolk we have had the added problem that changing priorities for the police has meant fewer and fewer resources being available to enforce parking waiting and loading restrictions.

The Suffolk Public Sector Leaders have agreed that the adoption of civil parking enforcement (CPE) for the whole of Suffolk must happen. We have been working together to put together the business case in support of our application to the Department for Transport for these powers. The application was submitted to the DfT on the 25<sup>th</sup> April to allow civil parking enforcement for the whole of Suffolk to commence from the 8<sup>th</sup> April 2019.

Getting agreement will provide an important tool for the local authorities in Suffolk to effectively manage parking on the highway as well as in council run car parks. In order to do this, we need to set out our guiding policies and objectives on how this will operate once civil parking enforcement is granted.

Suffolk County Council has provided the over-arching strategic approach to the operation of civil parking enforcement in the Suffolk Parking Management Strategy 2018. Public consultation on its content was carried out during March and April 2018.

The East Suffolk Area Parking Plan provides greater detail on how the Suffolk Parking Management Strategy will be implemented locally and reflects our vision for parking. It does not set out specific proposals for parking restrictions, but it does set out *how* decisions will be made, and how we will engage with councils, businesses and residents. It forms the basis for the delivery of the parking service for the community we serve in East Suffolk.

We commend the East Suffolk Parking Plan to you and hope you will find it informative. We will be consulting on its content during the summer and welcome any constructive comments on its content.

Cllr Carol Poulter; Suffolk Coastal Cabinet Member for the Green Environment

Cllr Graham Catchpole; Waveney Cabinet Member for Operational Partnerships

## East Suffolk area parking plan policies

### **Policy ESAPP 1**

- The East Suffolk Vision for Parking is “to provide parking where possible and control parking where necessary”.

### **Policy ESAPP 2**

- Off-street parking places will be provided to assist with traffic management, environmental issues, and to support and promote our communities.

### **Policy ESAPP 3**

- A single new East Suffolk off-street parking places traffic regulation order will be drafted to take account of the legal formation of the new authority.
- Where possible, the tariffs, terms and conditions of use will be simplified and harmonised throughout East Suffolk. Planned changes will be considered after the elections for the new authority in 2019.
- Car park tariffs and operational arrangements will be reviewed annually in accordance with the traffic order procedure regulations.

### **Policy ESAPP 4**

- A review of current on-street restrictions will be carried out in East Suffolk after the elections for the new authority in 2019.

### **Policy ESAPP 5**

Parking schemes that pass the ‘Highway Code test’ will be progressed without the need for extensive informal consultation. Only the statutory (formal) consultation process set out in the traffic regulation order process will be followed.

### **Policy ESAPP 6**

Parking scheme development other than Highway Code Test schemes will use local engagement with Opinion Survey, Detail Design consultation and Statutory Consultation as the standard procedure.

## **Policy ESAPP 7**

- New on-street parking schemes will be implemented with standard operational hours of Monday to Friday between 9:30am – 4:30pm with the potential to add Saturday.
- Longer operational hours – generally up to 6:30 or 7pm will only be considered where there is compelling evidence of its need.

## **Policy ESAPP 8**

Advisory Blue Badge bays will be used in residential areas for residents meeting the eligibility criteria. The carriageway markings will comply with TSRGD diagram 1028.3.

## **Policy ESAPP 9**

Footway parking measures will only be implemented where damage to the footway construction and underground services are unlikely to be compromised and after the 'double buggy' test and only with agreement from local councillors. Where allowed, appropriate signing in accordance to the TSRGD diagram 667/668 will be installed.

## **Policy ESAPP 10**

Parking schemes will be designed and implemented with the aim of reducing street clutter.

- Minimise the amount of signs used while still maintaining enforceability;
- Fix signs wherever possible to existing street furniture;
- Position new signs at the back of footways;
- In environmentally sensitive areas, consider using 'restricted street' or 'permit holder parking area' zones;
- In environmentally sensitive areas, consider applying for special signs approval from the DfT to use a reduced 'X' height for signs and consider wayleaves for fixing to garden walls and buildings
- In environmentally sensitive areas, consider omitting pay and display machines in favour of cashless payment options.

## **Policy ESAPP 11**

Where school keep clear markings are appropriate, they will only be marked on the school gate side of the road.

## About East Suffolk

1. East Suffolk is formed by the administrative districts of Waveney and Suffolk Coastal District Councils which are the most eastern and coastal facing of the Suffolk districts. The two councils have worked in partnership for a decade and in April 2019 will legally merge to become East Suffolk Council with new elections for a single council in May 2019.
2. East Suffolk will become the largest administrative district in Suffolk and of the 201 non metropolitan districts in England; it will also be the largest in population and 10<sup>th</sup> in terms of area<sup>1</sup>. It covers approximately 126,200 hectares (487 square miles) which is roughly 1/3 of both the Suffolk county area and population.
3. East Suffolk is an area of contrasts. The Edwardian seaside town of Felixstowe is also Britain's busiest container port and lies at the southern end of the Suffolk Heritage Coast. At its north-eastern end is the port of Lowestoft which is Suffolk's second town and Britain's most easterly settlement. The Suffolk Coast and Heath Area of Outstanding Natural Beauty lies in between and covers around 155 square miles of tranquil unspoilt landscape. The remaining area of East Suffolk is predominantly rural with village based communities and small market towns.
4. East Suffolk has a population of approximately 242,500 people living in 116,000 households. It is an ageing population. The major population centres are Lowestoft in the north with a population of 71,100<sup>2</sup>, Felixstowe in the south with a population of 23,700 and Kesgrave, Rushmere and Martlesham with a combined population of 25,500. The overall population for East Suffolk is predicted to grow by 18,700 by 2036<sup>3</sup>.
5. In spite of the recent economic uncertainty a very high proportion of the working age population are in work. Despite high levels of employment, access to affordable homes is a problem and the overall number of homes needed is not keeping up with the population. East Suffolk wishes to see 250 new affordable homes built each year. The East Suffolk economic strengths are focused on the ports, agriculture, on- and offshore energy supply, ICT global research, tourism, food and culture.

Administrative district	UK administrative district ranking by		Km <sup>2</sup>	Miles <sup>2</sup>	area % of county	Population			
	area	population				total	% of county	Density per	
								Miles <sup>2</sup>	Km <sup>2</sup>
Suffolk			3,801	1,468		745,200		508	196
<b>East Suffolk</b>	<b>17</b>	<b>70</b>	<b>1,262</b>	<b>487</b>	<b>33%</b>	<b>242,500</b>	<b>32.5%</b>	<b>498</b>	<b>192</b>
West Suffolk	27	105	1,035	400	27%	177,300	23.8%	444	171
Ipswich	292	157	40	15	1%	135,900	18.2%	8906	3439
Mid Suffolk	40	230	871	336	23%	100,000	13.4%	297	115
Babergh	72	270	594	229	16%	89,500	12.0%	390	151
					100%		100.0%		

<sup>1</sup> Estimates based on Office of National Statistics 2016 figures

<sup>2</sup> 2011 Census

<sup>3</sup> East Suffolk Housing Strategy 2017-2023

## Setting the context

### The need for an area parking plan

6. The Department for Transport (DfT) expects every local authority to 'have a clear idea of what its parking policy is and what it intends to achieve by it'.<sup>4</sup> In East Suffolk in the past these policies have largely focused on the supply and operation of the Council's off-street car park portfolio.
7. Suffolk Public Sector Leaders support the adoption of civil parking enforcement (CPE) powers for the whole of Suffolk. CPE has operated in the Ipswich Borough area since 2005 where enforcement is carried out by the Borough under an agency agreement with the County Council. The County Council are the only local authority in Suffolk who can apply for CPE powers. They have submitted an application to the DfT for CPE powers to be granted to cover the remaining borough and district areas with an anticipated implementation date of April 2019.
8. The intention in Suffolk is that enforcement will be carried out by the districts/boroughs under agency agreements with the County Council. With this in mind it is necessary both for the DfT application and for the wider community that the local authorities set out their parking policies and strategies with respect to CPE. The County Council have drafted the Suffolk Parking Management Strategy 2018 which provides a high level, over-arching strategy for the whole county. Area Parking Plans will be produced for each enforcement district setting out the detailed policies to be adopted for the management of on- and off-street parking. This document is the first East Suffolk Area Parking Plan.

### National policy

9. The Future of Transport White Paper, published in July 2004, set out a long-term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment over 15 years. Effective management of the road network is a key part of this.
10. The Traffic Management Act 2004 imposes an explicit duty on local highway authorities to manage their network so as to reduce congestion and disruption and to appoint a traffic manager. Part 6 of the Act also provides additional powers to do with parking, including increased scope to take over the enforcement of driving and parking offences from the police.<sup>5</sup>
11. Parking policies need to be integral to a local authority's transport strategy. The Department for Transport's guidance on Local Transport Plans published in July 2009, expects local authorities to set policies/strategies to contribute to the national transport goals<sup>6</sup>: –
  - Support economic growth;
  - Reduce carbon emissions;
  - Promote equality of opportunity;
  - Contribute to better safety, security and health;
  - Improve quality of life and a healthy natural environment.

<sup>4</sup> DfT – Operational Guidance to Local Authorities: Parking Policy and Enforcement (March 2015) para 2.10 pp9

<sup>5</sup> Operational Guidance para 2.1 pp8

<sup>6</sup> Department for Transport- Guidance on Local Transport Plans (July 2009) chapter 3 pp12

## Local policy

12. The Suffolk Local Transport Plan has a small section on parking. This has been expanded by the Suffolk Parking Management Strategy 2018 (SPMS) which is the over-arching, high level, strategic document setting out the County Council's local transport plan strategic objectives with respect to the operation of county-wide CPE. The document can be viewed at:–  
<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/suffolks-parking-management-strategy/>
13. The County Council has also produced the 'Suffolk Guidance for Parking' which provides guidance for developers and planning authorities. The document can be viewed at:–  
<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>
14. The East Suffolk area is formed by the current administrative districts of Suffolk Coastal and Waveney. The districts have worked in partnership for a decade and will formally merge to become a single new district – East Suffolk Council in April 2019. At the time of writing, the Council's are currently engaged in consultation on the draft content of new local plans. The current Local Plans for the Suffolk Coastal District and Waveney District which both contain brief policies for parking and transportation. The documents can be viewed at:–  
[www.eastsuffolk.gov.uk/planning/local-plans/](http://www.eastsuffolk.gov.uk/planning/local-plans/)
15. The East Suffolk Business Plan (2015 – 2023) has a vision to:–  
*"Maintain and sustainably improve the quality of life for everyone growing up in, living in, working in and visiting East Suffolk"*

The East Suffolk growth plan builds on its economic strengths:–

- Ports;
- On- and offshore energy supply;
- ICT global research;
- Tourism;
- Food and culture.

Despite these strengths/opportunities, East Suffolk faces the substantial challenges of:–

- Skills gap which suppresses incomes and deters local and inward investment;
- Poor transport and communication infrastructure;
- Lack of commercial land supply;
- Lack of all types of housing to meet the needs of businesses; and,
- Erosion and flood risk reducing the economic potential of key growth areas.

The East Suffolk Business Plan strategy for the delivery of its objectives is under three headings:–

- Enabling communities;
- Promoting economic growth; and,
- Becoming financially self-sufficient.

16. The East Suffolk Area Parking Plan supports these local policies and aims to interpret the parking and transportation aspects within them and set out a more detailed approach to the delivery of the objectives.

## Car ownership

17. The number of cars on Britain’s roads and the number of households with regular access to one or more vehicles continues to rise, particularly in areas with poor/infrequent access to public transport. Multiple car ownership in the East of England is significantly higher than the rest of England and is influenced by the rural nature and relative lack of access to good public transport. The county of Suffolk broadly matches the East of England percentage figures for car ownership and the same applies for East Suffolk.

18. At the Suffolk district/borough level, car ownership varies. Within the East Suffolk area there are marked differences between the districts. Households with no cars are significantly higher in Waveney (21.9%) than for the East of England (18.5%) but in the Suffolk Coastal area they are much lower (14%).

19. Households in Waveney with 1 car are higher (46.4%) than for the East of England (42.9%) and Suffolk (43.5%) while Suffolk Coastal levels are the same as the East of England and lower than for Suffolk. Car ownership and especially multiple car ownership is higher in the Suffolk Coastal district than in Waveney and for the whole of Suffolk. The table below shows car ownership figures based on information from the 2011 Census<sup>7</sup>. Taken together, the proportion for East Suffolk broadly match the overall proportions for Suffolk.

Car ownership	England	East of England	Suffolk		Suffolk Coastal		Waveney	
				338,720		60,230		55,880
Households	%	%	%		%	No.	%	No.
no car	25.8	18.5	17.9	60,631	14.0	8,432	21.9	12,238
1 car	42.2	42.9	43.5	<b>147,343</b>	42.9	<b>25,839</b>	46.4	<b>25,928</b>
2 car	24.7	29.1	29.2	<b>197,812</b>	32.1	<b>38,668</b>	24.3	<b>27,158</b>
3 car	5.5	6.9	6.8	<b>69,099</b>	8.0	<b>14,455</b>	5.6	<b>9,388</b>
4 or more	1.9	2.6	2.6	<b>35,227</b>	3.0	<b>7,228</b>	1.9	<b>4,247</b>
<b>Resident cars on the road (min)</b>				<b>449,481</b>		<b>86,189</b>		<b>66,721</b>

20. The continuing rise in vehicle ownership means 2018 car ownership in East Suffolk will be higher than the figures shown in the table. Taken together with the influx of visitors to the region and goods vehicles using the ports there will be an ever increasing pressure on the road network.

21. Within this timeframe (2011-2018) a change in priorities for policing has resulted in less resources being available year on year for the active enforcement of highway restrictions in Suffolk. Increasing traffic levels and reduced enforcement results in more congestion and pressure on parking and is the reason for asking the DfT to grant CPE powers for April 2019.

<sup>7</sup> Source:- Suffolk Observatory

## The case for managing parking

22. Managing parking is one of the most effective means of tackling congestion and its more serious consequences – increased air pollution, delay, and unreliability of scheduled public transport services. Lack of investment in transport infrastructure has been consistently acknowledged as a barrier to growth in the county and particularly in East Suffolk<sup>8</sup>. One of the outcomes of this underinvestment is a greater reliance on the car as the only viable means of transport.
23. For many residents and especially those living in rural communities the car is the only viable means of transport as there is often no viable public transport alternative, or where public transport does exist it is too infrequent or too slow. Parking on the public highway can lead to conflict and tension. On the one hand, motorists want to park conveniently close to their homes and destinations, on the other hand they do not want delayed journeys or the roads obstructed by parked vehicles. Balancing the conflicting demands is not always easy. Ease of access and convenient parking has an influence on a location's economic vitality and viability.

## East Suffolk vision for parking

### Policy ESAPP 1

- The East Suffolk Vision for Parking is “to provide parking where possible and control parking where necessary”.

## Civil parking enforcement

24. Under CPE, traffic authorities have control over parking and traffic policy and enforcement. In Suffolk, only the County Council (as highway authority) can apply for CPE powers. It is proposed that enforcement will be devolved and undertaken by the district/boroughs under an agency agreement, initially for 10 years.
25. All waiting, loading and parking restrictions on the public highway and the enforcement of bus lanes and public car parks are enforced through civil enforcement officers (CEOs) who issue a PCN (penalty charge notice) for vehicles found to be in contravention of the restrictions.
26. Enforcement is a civil rather than a criminal matter. Part 6 of the TMA2004 and the Secretary of State for Transport's Statutory Guidance and Operational Guidance set out the process for handling PCNs. Motorists who receive a PCN have the opportunity to challenge its validity without charge and includes access to an independent parking adjudicator whose decision is legally binding on both parties.
27. Income from the issue of PCNs is retained by the enforcement authority to contribute towards the cost of enforcement. Authorities who operate CPE generally do not make a surplus and many operate at a deficit. The use of any surplus income is regulated by section 55 of the RTRA.

<sup>8</sup> East Suffolk Growth Plan 2014-2025

## Legislative basis for civil parking enforcement

28. **The Road Traffic Regulation Act 1984** (as amended) (RTRA) makes it the duty of the local traffic authority (Suffolk County Council) to “secure the expeditious, convenient and safe movement of traffic and the provision of suitable and adequate parking facilities so far as this is practicable<sup>9</sup>”. The Act empowers the County Council to control waiting and loading and to provide parking places on the highway. The Act gives powers for local authorities (usually district/borough councils) to provide off-street parking places.<sup>10</sup>
29. Part VIII of the RTRA deals with the enforcement of on- and off-street parking restrictions which are applicable where civil parking enforcement does not operate. The police are responsible for enforcing waiting, limited waiting, and loading restrictions on the highway. Local authorities are responsible for enforcing permit holder and paid parking bays on the highway and off-street parking places. Parking offences are criminal proceedings enforced through the Court process (this is the current operating situation in East Suffolk at 2018).
30. **The Traffic Orders (Procedure) (England and Wales) Regulations 1996** sets out the legal process for making traffic regulation orders to implement measures under the RTRA.
31. **The Road Traffic Act 1991** (RTA) decriminalised parking offences and introduced civil penalties in London taking the role of enforcement of waiting, loading and parking away from the police and traffic warden service and transferring the responsibility of enforcement to the traffic authority.
32. **The Civil Enforcement of Parking Contraventions (England) General Regulations 1997** extended the civil penalties regime outside of London.
33. **Part 6 of the Traffic Management Act 2004** (enacted March 2008) (TMA) replaced the RTA for England and Wales and is the current legislation under which CPE is regulated.
34. **The Secretary of State’s Statutory Guidance to Local Authorities on Civil Enforcement of Parking Contraventions** (November 2015) and;
35. **The Secretary of State’s Operational Guidance to Local Authorities on Parking Policy and Enforcement** (March 2015) provide additional regulation and good practice for traffic authorities operating CPE.
36. **The Traffic Signs Regulations and General Directions 2016** (TSRGD) prescribes the traffic and parking signs to be used on the highway.

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<sup>9</sup> S.12 RTRA

<sup>10</sup> S.32 RTRA

## Current parking stock in East Suffolk

37. Within the context of the East Suffolk Area Parking Plan, consideration of parking stock will focus on parking in council owned/run off-street parking places (car parks) and parking on the public highway.

## Current off-street parking stock

38. In East Suffolk, the two district councils provide or manage around 124 car parks; 67 in the Suffolk Coastal area and 56 for the Waveney district area. Other land owners/operators in East Suffolk provide car parks primarily in association with retail, transport or leisure destinations.

39. The East Suffolk policy objective for off-street parking is:-

### Policy ESAPP 2

- Off-street parking places will be provided to assist with traffic management, environmental issues, and to support and promote our communities.

40. Varying car park tariffs are applicable across the districts and are designed to support local communities, taking into account local demand and availability of parking. A full list of the current off-street car park tariffs is contained in Appendix E. In both districts, local village parking provision is generally free or includes free one hour short stay parking. In areas where there is a higher demand for parking and charges apply the typical one hour off-street charge is:-

- Suffolk Coastal            40p - £1.40/hour.
- Waveney                        70p - £1.20/hour.

41. Local authorities regularly review their parking charges to ensure they are fit for purpose in delivering their local policy objectives. The review process also takes account of charges in neighbouring authorities and in private commercial car parks. The last car park charging review was carried out for the Waveney district in 2016 and for Suffolk Coastal in 2018. The legal merger to form East Suffolk Council will necessitate changes to the existing off-street traffic orders and provides an opportunity for harmonisation of tariffs, terms of use and other operational arrangements.

### Policy ESAPP 3

- A single new East Suffolk off-street parking places traffic regulation order will be drafted to take account of the legal formation of the new authority.
- Where possible, the tariffs, terms and conditions of use will be simplified and harmonised throughout East Suffolk. Planned changes will be considered after the elections for the new authority in 2019.
- Car park tariffs and operational arrangements will be reviewed annually in accordance with the traffic order procedure regulations.

**Comparison of costs for off-street parking in East Anglia**

42. Benchmarking<sup>11</sup> charges in East Anglia this year show that the East Suffolk car park charges are in the lower quartile of charges. The results below focus on one hour charges and are correct at January 2018:-

- Suffolk Coastal 40p - £1.40/hour.
- Waveney 70p - £1.20/hour.
- Ipswich 70p - £1.80/hour
- Bury St. Edmunds £1.00 - £3.50/hour
- Mid Suffolk free
- Babergh free
- Great Yarmouth £1.00 - £2.00/hour
- Norwich £1.40 - £2.00/hour
- Kings Lynn £1.60/hour
- Colchester £1.80 - £2.10/hour
- Chelmsford £1.20 - £1.40/hour
- Cambridge £1.20 -£2.10/hour
- Ely free or £3/day

**Current on-street parking stock**

43. In East Suffolk most on-street parking is unrestricted and uncharged. In built up areas some limited waiting controls are in operation. These range from 30 minutes, one hour or 2 hour restrictions with no return generally set at two hours. These arrangements have generally been in place for a number of years without change or review.

44. In preparation for adopting CPE the County Council has carried out a review of all existing waiting, loading and parking restrictions on the highway and compared them with the legal description in the traffic regulation orders. During 2018, any discrepancies will be resolved and new traffic regulation orders will be advertised reflecting the restrictions as they appear on the highway.

45. The implementation of CPE will bring greater consistency and level of enforcement on the highway network. A possible consequence may be that the current restrictions are no longer fit for purpose and need to be amended. Any review will be dependent on the availability of a budget to pay for the review, consultation and implementation. The process for undertaking a review is set out in the following section.

**Comparison of costs for on-street charges in East Anglia**

46. Benchmarking<sup>12</sup> with other districts in East Anglia show that East Suffolk is in the minority for not charging for parking space on the highway. While there are no current plans to change this arrangement it will be kept under review. The results below focus on one hour charges for on-street parking in East Anglia and are correct at January 2018:-

<sup>11</sup> Source: local authority parking websites and correct at January 2018

<sup>12</sup> Source: local authority parking websites and correct at January 2018

## On-street paid parking charges in East Anglia correct at January 2018

- Suffolk Coastal free/limited waiting
  - Waveney free/limited waiting
  - Ipswich £1.50 - £2.00/hour
  - Bury St. Edmunds £2.20/hour
  - Mid Suffolk N/A\*
  - Babergh N/A\*
  - Great Yarmouth £3.00 all day
  - Norwich £1.20 - £2.00/hour
  - Kings Lynn N/A\*
  - Colchester N/A\*
  - Chelmsford £0.90/hour
  - Cambridgeshire £2.40/hour
  - Ely N/A
- \* No information available at the time through a website review

## Comparison of on-street permit costs in East Anglia

47. There are currently three on-street resident permit parking schemes in East Suffolk in the towns of Beccles, Halesworth and Lowestoft. These schemes were implemented several years ago and have not been reviewed in at least a decade.
48. The current cost of a resident permit in East Suffolk for a typical car is lower than any other district in Suffolk or East Anglia as a whole. The permit charge has remained unchanged for many years at £22/year. This does not cover the true cost of administering the permit scheme or its enforcement.

## On-street resident permit price (correct at January 2018)

- Suffolk Coastal N/A
  - Waveney £22
  - Ipswich £100/year
  - Bury St. Edmunds £29 - £76/year (prices vary by parking zone)
  - Mid Suffolk N/A\*
  - Babergh N/A\*
  - Great Yarmouth £40/year
  - Norwich £21.60 – 49.80/year (prices vary on vehicle size)
  - Kings Lynn £40/year
  - Colchester £62/year
  - Chelmsford £26/year
  - Cambridgeshire £50 - £81/year (prices vary by parking zone)
  - Ely N/A
- \* No information available at the time through a website review

### **Policy ESAPP 4**

- A review of current on-street charges will be carried out in East Suffolk after the elections for the new authority in 2019.

## Requests for new on-street restrictions or amendments to existing waiting restrictions

49. A request to “do something about parking” is one of the most frequent issues for local authorities up and down the country and has the potential to be one of the most contentious. Not everybody will have the same viewpoint and individual or group held views, however strongly expressed, may not represent the collective view of the silent majority. The need for community engagement and consultation before any proposals are introduced is essential.
50. Once CPE is adopted for the whole of Suffolk, it will be the responsibility of the enforcement districts under agency agreements with the County Council to manage and deliver enforcement. It is expected that the prioritisation and delivery of new or revised restrictions will also be the responsibility of the enforcement districts in consultation with the County Council. East Suffolk Council will use the policies set out in this Area Parking Plan to prioritise and deliver such requests where there is evidence of a problem and subject to funding being available for their development. The workflow process is set out in Appendix D.
51. The most common types of parking issue can be broken down into four categories and include:–
- a. Dangerous and inconsiderate parking:–
    - ✓ Parking around junctions;
    - ✓ Parking on bends;
    - ✓ Blocking driveways and accesses;
    - ✓ Affecting free flow of traffic.
  - b. School parking:–
    - ✓ Inconsiderate/dangerous parking during the school-run;
    - ✓ School access controls;
    - ✓ Student parking.
  - c. Parking priority schemes:–
    - ✓ Where residents have limited/no off-street parking and want priority over other motorists to park on-street;
    - ✓ A turnover of parking spaces to serve local businesses and stop all-day parking.
  - d. ‘Commuter’ parking on local roads:–
    - ✓ Clogging up local streets;
    - ✓ Restricting residential parking.
52. The first two categories potentially involve the introduction of yellow line waiting restrictions while the last two categories potentially involve either prioritised parking or some form of waiting restrictions on the highway. Tackling an issue in isolation is likely to result in pushing the problem on to someone else in a different or adjacent area.

## Taking things one step at a time

- Who is raising the issue?
- What is the evidence of a problem?
- Who or where is the source of the evidence?
- What actual safety risks are there?
- What is the potential impact on the wider area?
- How is the request to be funded?

53. In the first instance, a 'desktop' review will be carried out to assess the evidence of a problem; this will include a review of requests from residents, town/parish councils, councillors and other sources. Other data sources such as accident data or reports of problems with scheduled public transport or refuse collection can also provide valuable data. Site inspections will generally be needed, possibly over a number of days and at different times of the day to establish if a problem exists, the times, days and the extent of the area affected. The desktop review will aim to categorise requests as:-

### Priority 1 - Highway Safety

54. This forms probably the highest proportion of issues raised by members of the public. Invariably these relate to the potential risk to safety, particularly at junctions or where parking is considered hazardous.

### Priority 2 – Accessibility

55. Issues that affect the flow of traffic where parking contributes to problems that affect through traffic or increase congestion on the highway network. This is generally not a safety issue but linked to congestion or increased journey times. On-street parking can be one of the best (and cheapest) forms of traffic calming; it can also be a major cause of congestion. Any solution will need to take into account the potential that reducing on-street parking may have for increasing speed on the highway.

### Priority 3 - Capacity

56. Issues around the use of the available kerbside space for parking and the prioritisation of the space will be considered according to a hierarchy of parking need. This will vary according to location.

### Priority 4 - Amenity

57. Parked vehicles, traffic signs and road markings can have a detrimental effect on the visual or environmental amenity of a particular area. This includes parking on footways and/or grass verges or where parking is considered to be a visual intrusion rather than a safety or accessibility issue.

### Priority 5 - Monitor

58. Some parking and/or safety issues observed but they are not sufficiently or consistently serious to justify action at this time. Continue monitoring the situation to establish if the problem worsens over time.

## Localised highway safety schemes

59. A significant number of requests relate to dangerous or obstructive parking where motorists are breaking Highway Code rules.

**Highway Code Rule 242** states: - “You must not leave your vehicle or trailer in a dangerous position or where it causes any unnecessary obstruction of the road.”

**Highway Code Rule 243** states: - “do not stop or park:-

- near a school entrance;
- anywhere you would prevent access for Emergency Services;
- at or near a bus or tram stop or taxi rank;
- on the approach to a level crossing/tramway crossing;
- opposite or within 10 metres (32 feet) of a junction, except in an authorised parking space;
- near the brow of a hill or hump bridge;
- opposite a traffic island or (if this would cause an obstruction) another parked vehicle;
- where you would force other traffic to enter a tram lane;
- where the kerb has been lowered to help wheelchair users and powered mobility vehicles;
- in front of an entrance to a property;
- on a bend;
- where you would obstruct cyclists’ use of cycle facilities except when forced to do so by stationary traffic;

## Highway Code test

60. Highway safety will always be our main priority. Where inappropriate, persistent or dangerous parking is detrimental to road safety and funding is available to do something about it we propose adopting a ‘Highway Code Test’ based on Rule 242 and Rule 243.

61. The Highway Code Test would apply where persistent parking is breaking these rules at specific locations and there is a desire/need to install yellow line waiting restrictions to reinforce the Highway Code rules. Measures to resolve the problem should not have to go through extensive and costly informal consultation stages as motorists **must not park** in these locations in the first place. Objections to the proposals are unlikely or where they are received they would be overruled on the basis that the Highway Code stipulates motorists must not park at these locations.

62. It is envisaged that Highway Code Test proposals would be batched together (e.g. a series of junction protection measures in a particular area or across the district) for economy/efficiency. Where it is proposed to introduce waiting restrictions to reinforce only the Highway Code rules and both the County Council and East Suffolk Council agree, it is intended to dispense with informal consultation stages and proceed directly to the Statutory Consultation stage when the traffic orders are formally advertised.

### Policy ESAPP 5

Parking schemes that pass the ‘Highway Code test’ will be progressed without the need for extensive informal consultation. Only the statutory (formal) consultation process set out in the traffic regulation order process will apply.

## Local engagement

63. Where a parking problem has been established and funding secured for the development of a solution, the stakeholder public consultation process will be:
- opinion survey;
  - detailed design;
  - statutory consultation.
64. In certain situations it may be possible to combine the detailed design and statutory consultation stage into a single operation. For 'Highway Code Test' schemes there will only be the single statutory consultation stage. Further detail on the consultation process is contained in Appendix A.

## Opinion survey

65. It is intended that an opinion survey will use a standard questionnaire designed to establish the extent of the parking problem and inform the detailed design process. The opinion survey may cover a slightly wider geographic area to help define the area where there is a greater appetite for a possible solution. The consultation period will mirror the traffic regulation order statutory timeframe of 21 days. The public will be encouraged to make use of the online consultation feature on the website and respond online but will also allow for a paper response. A copy of the proposed questionnaire is contained in Appendix B.
66. Analysis of the opinion survey will establish if and where there is local support for a parking solution without wasting time on abortive design. If there is support in principle for some form of solution the analysis of the results will help inform the decision making process for scoping the detailed design.

## Detailed design consultation

67. The detailed design consultation will be based on tried and tested measures which are set out below. Once the preliminary design is finalised and agreed, a second, detailed design consultation will be carried out to gauge support for the proposed solution and the extent of support for the scheme design. Any design will take a holistic view and will consider the needs of all highway users not just those of the frontagers. This means we will consider where appropriate the provision of:
- bus stop clearways;
  - loading bays;
  - taxis bays;
  - dedicated and/or disabled parking provision;
  - car share/car clubs;
  - permit holder parking;
  - short stay parking (free or paid);
  - long stay parking (free or paid).
68. As with the opinion survey, we will use a standardised questionnaire which will allow the local community to express their view via the online questionnaire on the proposals for their street.

The consultation period will mirror the statutory timeframe when traffic orders are advertised of 21 days. A copy of the detailed design questionnaire is contained in Appendix C.

69. The results of the detailed design consultation will inform the decision making process. Any amendments, changes or omissions will be finalised along with the financial assessment for implementing and operating the scheme. These will be subject to a decision report. Where approval is given to progress a scheme it will include the approval to advertise traffic orders along with the statement of reasons for doing so.

### Statutory consultation

70. The statutory consultation stage is when the draft traffic order is formally advertised and the local community have a statutory 21 day period to make written objection to the proposals. The process involves placing street notices in the area, adverts in the local press and a letter drop to affected frontagers and consultation with statutory consultees (e.g. police, emergency services, freight transport representatives and other public bodies). The consultation will also be on the current consultations section of the website.
71. Any objections have to be made in writing and have to specify the specific reasons for objecting. Authorities are required to consider all written objections and test the objection against the statement of reasons for proposing the scheme. Any decision to overrule an objection has to be communicated to the objector within 14 days of the date for making of the traffic order.

#### **Policy ESAPP 6**

Parking scheme development other than Highway Code Test schemes will use local engagement with Opinion Survey, Detailed Design consultation and Statutory Consultation as the standard procedure.

## The legal stuff

72. In theory, any vehicle which is parked on the highway other than in a designated parking place could be considered to be causing an obstruction under Common Law, which allows for the public to pass and re-pass over the public highway.
73. The Highways Act 1980 makes it an offence to wilfully obstruct the free passage of movement over the highway but in reality it is difficult to prosecute except in the cases of trading on the highway or materials deposited on the highway.
74. The police have powers to issue a fixed penalty notice for vehicles causing an unnecessary obstruction or in circumstances where a vehicle or trailer at rest is a danger to other highway users.
75. In most circumstances where parking needs to be controlled, the traffic authority uses waiting and/or loading restrictions and/or parking place restrictions to indicate to the highway user what activity is allowed or prohibited at a particular location.

## Traffic regulation orders

76. In almost all circumstances, restrictions will need more than paint on the road to make them legal and enforceable. Traffic Regulation Orders (TROs) are the necessary legal documents and there is a process that has to be followed for making almost all waiting, loading and parking place restrictions. They are also necessary for most speed restrictions and prescribed route restrictions (banned turns, one way, no entry etc.).
77. The Traffic Regulation Order process is governed by legislation. The Road Traffic Regulation Act 1984 (as amended), The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1986 sets out the powers and procedures a Traffic Authority must follow to introduce restrictions.
78. The Traffic Signs Regulations and General Directions 2015 sets out the standard signs and lines that must be used in the UK to indicate restrictions to motorists.
79. The main exceptions where a TRO is no longer required for a legally enforceable restriction are:-
  - ✓ zebra crossing zigzags;
  - ✓ fire or school keep clear zigzags (signing is still required);
  - ✓ box junctions;
  - ✓ bus stop clearways;
  - ✓ 30 mph speed limits (in urbanised areas with street lighting).

Double yellow lines do not require time plates to be enforceable.

## The traffic order procedure

80. Generally, waiting and loading and/or parking restrictions are introduced using a permanent traffic regulation order, although in limited circumstances temporary or experimental traffic regulation orders may also be used. The procedure for introducing any type of traffic regulation order is set out in legislation<sup>13</sup> and all traffic authorities are required to follow the same process. This is sometimes referred to as ‘the statutory consultation’, or ‘formal consultation’. Once a scheme has been agreed then a legal process must be followed for advertising and making the traffic order.

## Permanent traffic regulation order

81. This is the most common type of traffic order used by local authorities. The procedure is:-

- a) Drafting the traffic regulation order – this consists of written ‘Articles’ setting out the scope of the order and ‘Schedules’ (Suffolk will use map-based schedules) showing where restrictions/parking places are located.
- b) Drafting the ‘Statement of Reasons’, which sets out the reason(s) why the traffic regulation order is being proposed.
- c) Advertising the Notice of Proposal in the local press and on-street notices in the roads affected. The Notice of Proposal is required to be brief: it must give the name of the traffic order, an outline of its measures, where deposited documents can be inspected, and state the timeframe and procedure for making written objection/comments about the proposed measures.
- d) Writing to ‘Statutory Consultees’ (police/emergency services, Freight Transport Association, Road Haulage Association, bus operators, other directly affected councils) giving them the opportunity to comment on the traffic order proposals.
- e) The ‘Objection Period’ is set out in legislation and must be 21 days. Longer periods can be used in exceptional circumstances if there is a good reason for doing so.
- f) Objections must be in writing and must clearly state the reason(s) for the objection.
- g) All objections have to be reviewed and are referenced or ‘tested’ against the statement of reasons. Objections can be overruled and where this is done, the objector must be informed in writing after the traffic order comes into force. Where there are significant objections, consideration may need to be given to modify the proposals to take into account the objections. In such circumstances, consideration will need to be given whether the modifications need to be re-advertised.
- h) The formal and documented decision to proceed or ‘Make’ the traffic order will generally be a County Council decision unless the role is devolved to the Enforcement Authority under the agency agreement.

<sup>13</sup> The Local Authorities’ Traffic Orders (Procedure) (England and Wales) Regulations 1996

- i) 'Made' traffic regulation orders will contain the date and signature of 'making' and the date when the provisions of the traffic order come into effect. Some authorities affix a seal to the traffic order although there is no legal requirement to do so. A permanent traffic order cannot be 'made' until after the expiry of the 21 day objection period.
- j) A 'Notice of Making' must be advertised in the local press within 14 days of the date of making and contain the name of the traffic order, the date it was 'Made', when the measures come into effect – i.e. when they become enforceable and must also contain the statement that an appeal to the High Court within 6 weeks of the date of making can be made if the traffic authority has not followed the correct legal process.
- k) At the same time as the Notice of Making is published, letters should be sent to all objectors informing them of the decision.
- l) The signs and lines can be implemented at any time after the decision is made to proceed with the proposals. If this is done before the traffic order comes into effect, the measures cannot be enforced and it is good practice that any signs are masked until the restrictions become operational.

82. A permanent traffic regulation order process can take anything from 4 months to a year or more to complete the process depending on the complexity and level of objection to the proposals.

### Experimental traffic regulation orders

83. Schemes and restrictions can be implemented under these orders where there is a genuine experimental aspect to the proposals which could result in a need to vary some of the provisions if the experiment is not working. An experimental order has a maximum life of 18 months after which the provisions within the order lapse and cease to be enforceable. If the provisions within the experimental order have been successful and there is a desire that they are retained, the traffic authority must publish its intention to make the experimental order permanent before it expires.
- a) Drafting the traffic regulation order – this consists of written 'Articles' setting out the scope of the order and 'Schedules' (Suffolk will use map-based schedules) showing where restrictions/parking places are located.
  - b) Drafting the 'Statement of Reasons', which sets out the reason(s) why the traffic regulation order is being proposed.
  - c) Advertising the Notice of Making in the local press and on-street notices in the roads affected. The Notice of Making is required to be brief: it must give the name of the traffic order, an outline of its measures, where deposited documents can be inspected, and states the timeframe and procedure for making written objection/comments about the proposed measures.
  - d) Writing to 'Statutory Consultees' (police/emergency services, Freight Transport Association, Road Haulage Association, bus operators, other council's directly affected) giving them the opportunity to comment on the traffic order proposals.

- e) The 'Objection Period' is set out in legislation and must be 6 months.
- f) Objections must be in writing and must clearly state the reason(s) for the objection.
- g) All objections have to be reviewed and are referenced or 'tested' against the statement of reasons. Objections can be overruled or it may be a case that changes to the experimental order provisions would be beneficial.
- h) A 'Notice of Making' must be advertised in the local press. The provisions of the order cannot come into force until 7 days after the Notice of Making is published.
- i) The signs and lines can be implemented at any time after the decisions is made to proceed with the proposals. If this is done before the traffic order comes into effect, the measures cannot be enforced and it is good practice that any signs are masked until the restrictions become operational.
- j) Where changes are planned to the provisions within the experimental order and where this is done, an amendment to the experimental order has to be advertised. As with the original experimental traffic regulation order there needs to be a further 6 month objection period commencing once the amendment has been made.
- k) The timeframe for an experimental order can be considered to consist of three 6 month periods: the first 6 months is the original objection period; between 1-12 months, further changes and amendments can be made and advertised with a further 6 month objection period. After 12 months no more changes can be made. Before the end of the 18 month life of the experimental order a decision needs to be made whether to make the provisions of the order permanent, or make a new order with different provisions, or let the experimental order laps and return the highway to its previous situation.

## Managing requests in the current economic climate

### Delivering the solution

84. The adoption of CPE for the whole of Suffolk will for the first time make local authorities responsible for the enforcement of the restrictions they have implemented under the traffic order process. Many restrictions are largely self-enforcing and ideally this is the main objective of CPE – 100% compliance. The reality is somewhat different and there will be areas or situations where motorists will continue to take a chance by parking in contravention.
85. Dealing with multiple requests from a particular area and/or where requests for prioritised parking are being made will require a more considered approach based on collection and analysis of data by officers.

### Dangerous parking

86. Where the issue is predominantly a problem with dangerous and inconsiderate parking, we have developed a simplified process for measures that pass the 'Highway Code Test'. This 'test', as its name implies is based on the Highway Code rules which state where a motorist must not park, e.g., within 10m of a junction, causing an obstruction or a danger to other highway users.
87. In the current economic climate it is unlikely that an individual location would be progressed in isolation. It is envisaged that similar locations would be batched together to take advantage of economies of scale in the order making and implementation process. Where funding is available the measures will be progressed without any informal consultation process beforehand. The Traffic Regulation Order process is still necessary but the likelihood will be that any objections will be overruled on the basis that proposed restrictions are reinforcing the Highway Code rules. The 'Highway Code Test' process should see schemes delivered in under a year.

### Tackling parking congestion

88. Parking congestion occurs where parking stress (the number of vehicles parking) is close to, or outweighs parking capacity (the amount of available kerbside space). Only if parking stress is consistently very high (greater than 80-85%) will the introduction of any form of parking controls be considered even if there is local support and funding for such a scheme as it would not be good use of increasingly scarce resources.
89. Parking can be a very effective form of passive traffic calming. Removing parking entirely (except on roads that form part of the strategic highway network) generally is not a good idea as it can result in increased traffic speed and increasing hazards for other road users. It also tends to displace parking elsewhere resulting in further demands for parking controls. This in itself does not represent value for money.
90. Parking schemes must make the best use of kerbside space. All schemes will be designed and implemented on the basis that parking will be allowed where it is safe for vehicles to park. It may be that a solution to the problem would be to introduce small sections of yellow line restriction to allow vehicles to safely manoeuvre around parked vehicles. This could be achieved using the Highway Code Test process.

91. Where the parking stress is caused by a variety of users (e.g. resident, shopper and commuter) wanting to park in the same location, the introduction of some form of parking prioritisation may be the solution. Such schemes could involve prioritisation by user such as a permit holder scheme and/or introducing limited waiting controls to remove commuter parking.
92. Schemes will not be progressed if the primary aim is only to remove all non-resident parking from a street unless there is overwhelming evidence that there is insufficient parking space for residents on- and off-street.
93. Where the parking problem is primarily caused by residents having too many cars for the available kerbside parking space, the only way to resolve the problem is to introduce a scheme which restricts the number of resident vehicles through price and eligibility. This may not be popular and it may be better to do nothing in terms of parking restrictions.

### Commuter parking

94. Commuter parking can be simply put as 'motorists who are not residents'. One of the main and most irritating parking problems for a local community is caused by motorists parking all day and taking up kerb-side parking spaces to the detriment of local residents. When this is coupled with banging doors and revving engines early and late at night it is probably the most common reason for requests for parking controls to be introduced.
95. Commuters using a popular destination will walk considerable distances to avoid having to pay for parking; 10-15 minutes not being an untypical walking distance. Introducing parking controls in just the immediate and current parking problem area may be short-sighted as the short-term parking solution is likely to displace the parking problem to the nearest unrestricted area. Care needs to be taken to look at a sufficiently wide area in the preliminary stages.

### Managing parking around accesses

96. The simplest and quickest measure to resolve inconsiderate parking near driveways is the use of Access Protection Markings (APT). These are white 'H' bar markings and while they are not enforceable, they do help indicate to motorists where not to park. Residents can apply directly to the local authority and pay for these markings to be installed. (will this be a county or district function?)

### Controlled parking zones

97. Probably the most common form of parking restriction but also one of the most misunderstood. Technically a CPZ is an environmental measure to reduce the need for repeater sign plates along the highway where a common waiting restriction is present. In its purest form, a CPZ does not contain parking places. The reality is that almost always parking bays are included in a CPZ but are in fact an 'exemption' from the common waiting restriction and therefore require having a sign with operational details for each bay. If a parking scheme is made up of mainly double yellow lines (which do not need to be plated) and parking bays it does not need to be introduced as a CPZ. Schemes termed 'resident parking' or 'resident zone/controls' are usually some form of CPZ.

98. If a CPZ is deemed to be the best parking solution, consideration needs to be given to the operational hours and days of control. During the operational hours, residents who wish to park will need to buy a permit for their vehicle and potentially pay for a voucher for their visitors to park. The scheme could also allow other eligibility classes (e.g. local businesses) to be able to purchase a permit.
99. Extensive operational hours may initially seem attractive but will not, in most circumstances, provide a greater level of protection. It will mean that residents who use their car to drive to and from work will have to buy a permit even though they do not normally park in the zone during the day.
100. Traditionally, CPZs have been implemented with working hour controls that replicate the ones typically used for single yellow lines where maintaining traffic flow is the priority; i.e. 8:30am-6:30pm. While these hours are necessary for maintaining vehicular access the hours do not have to be as long to remove all day non-residents parking from a permit area.
101. Shorter operational hours for permit holder bays have several advantages. They allow visitors to come and go at the start and end of the day without having to pay for a permit or voucher. For the resident who uses their own car to commute to and from work, the shorter operational hours could mean they do not need to buy a permit. A number of enforcement authorities have adopted shorter operational hours for CPZs of 9:30am-4:30pm and have reported that they work well and are generally popular with residents. It is recommended that a similar approach is adopted in East Suffolk for new schemes
102. Extended operational hours will only be considered where there is compelling evidence that extensive non-resident parking pressures are present and would make it difficult for a resident to find a parking space without longer controls.

## Policy ESAPP 7

- New on-street parking schemes will be implemented with standard operational hours of Monday to Friday between 9:30am – 4:30pm with the potential to add Saturday.
- Longer operational hours – generally up to 6:30 or 7pm will only be considered where there is compelling evidence of need.

## Disabled parking bays in urban/town centre areas

103. The disabled badge scheme was originally introduced as the Orange Badge scheme in 1971 but was replaced by the current European Blue Badge scheme. The scheme was introduced to help those with severe mobility problems and who rely on a car for transportation to be able to park close to where they need to go. Apart from the concession to be able to park for up to 3 hours on yellow lines where it is safe to park and where there is no loading restriction in force, it also allowed traffic authorities to mark disabled parking bays on the highway.

104. The Traffic Signs Regulations and General Directions (TSRGD) sets out the national requirements for signs and lines to be used on the highway network. Disabled parking bays backed by a traffic order (and therefore enforceable) need to be marked out in accordance with TSRGD diagram 661A (sign) and diagram 1028.3 (line). In urban town centre settings there is a need to provide general enforceable Blue Badge bays and the DfT traffic Advisory Leaflet 5/95 provides guidance on how this should be achieved. Blue Badge bays should be provided within 50-100m of likely destinations such as Banks, Post Offices or shops and regularly enforced to prevent misuse.

### Disabled parking bays in residential areas

105. In residential areas a disabled bay could be installed if there is a Blue Badge holder living at the property and the car that the Blue Badge holder uses is registered at the address. Bays will not be installed if there is suitable off-street parking, within 10m of a junction, or if the road is not wide enough to accommodate the bay and still allow the free flow of traffic (including larger vehicles). Disabled bays in residential areas are installed as advisory bays. This means they do not have a traffic sign or traffic order and have no legal standing. The disabled road marking is the only indicator but in the main they are generally well respected by other drivers and left for the use of those who need them. The main advantage of using advisory bays is the speed of installation.

#### Policy ESAPP 8

Advisory Blue Badge bays will be used in residential areas for residents meeting the eligibility criteria. The carriageway markings will comply with TSRGD diagram 1028.3.

### Footway and verge parking

106. Footway and verge parking is a national issue. Motorists often do so in the belief that they are assisting other motorists by keeping the carriageway free for passing vehicles. What motorists fail to take into account is the problem it causes for pedestrians and wheelchair users trying to walk on the footway or the potential damage to the footway itself and assets under the footway.
107. Under current legislation, taking action against vehicles parking on the footway or verge is not straightforward. Where a yellow line restriction is in place it also covers the footway and/or verge and can be enforced. Where no restrictions are in place, CEOs cannot enforce unless there is a specific footway parking restriction in place (unless the vehicle is a lorry). This may change in the medium term as the DfT (Department for Transport) announced in April 2018 that they are considering options to extend the blanket-wide footway parking bans that apply in London and some other cities.
108. The 2016 edition of the TSRGD allowed the option to create an area-wide footway/verge parking ban which is signed in a similar fashion to a CPZ. This is a potentially attractive option to consider but before adopting this approach there will be a need to define some standardised protocols to be used in the consideration of future schemes.

109. There are certain locations where vehicles have traditionally parked, partly or fully on the footway in order to maintain a wide enough thoroughfare on the carriageway or where the footway is sufficiently wide that footway parking would not cause a problem for pedestrians. Certain tests need to be applied before allowing footway parking. It is proposed that a ‘double buggy’ rule will be applied whereby a double buggy or wheelchair can easily pass a parked vehicle – in essence the unobstructed footway width would be around 1200mm.
110. In some locations where the footway and carriageway is particularly narrow, consideration will be given to allow footway parking on one side of the road provided the other footway is unobstructed. Where footway parking is allowed, traffic signs complying with TSRGD diagram 667 or 668 will be placed to indicate the extents where footway parking is allowed. Verge parking will not be allowed.

### **Policy ESAPP 9**

Footway parking measures will only be implemented where damage to the footway construction and underground services are unlikely to be compromised and after the ‘double buggy’ test and only with agreement from local councillors. Where allowed, appropriate signing in accordance to the TSRGD diagram 667/668 will be installed.

### **Street clutter reduction**

111. Parking schemes inevitably lead to an increase in signs and lines and care and consideration needs to be given to the negative impact they can have on the environment. In rural and village locations particular care needs to be given to minimise urbanisation and the same approach is applicable in our historic market towns. The Traffic Signs Manual published by the DfT gives advice and guidance. Chapter 5, published in 2003 provides guidance on waiting and parking installations. English Heritage published ‘Streets for All’ in September 2004. Its aim was to advocate looking at streets as a whole and to reduce unnecessary street clutter on the basis that ‘less is more’. Since then, Historic England has published regional ‘Streets for All’ documents providing advice and guidance on paved surfaces, street furniture and traffic signs.
112. The DfT published a Traffic Advisory Leaflet, Reducing Sign Clutter (TAL 01/13) in January 2013. This document advocates engineers to ‘use their engineering judgement’ on the number and location of signs and street furniture. This advice does not engender a particularly consistent approach and it is down to individuals and organisations to establish its own design principles. Further work needs to be done to produce a clear, design guidance for East Suffolk but the principles will be an aim to:-
- reduce the number of signs to a minimum;
  - combine signs where possible;
  - fix signs to existing street furniture;
  - avoid marking lines on cobbles or granite setts – instead use restricted street process;
  - consider using ‘permit holder parking only’ zones where appropriate.
  - Conservation signing and lining where appropriate.

**Policy ESAPP 10**

Parking schemes will be designed and implemented with the aim to reduce street clutter.

- Minimise the amount of signs used while still maintaining enforceability;
- Fix signs wherever possible to existing street furniture;
- New signs positioned at the back of footways;
- In environmentally sensitive areas, consider using 'restricted street' or 'permit holder parking area' zones;
- In environmentally sensitive areas, consider applying for special signs approval from the DfT to use a reduced 'X' height for signs and consider wayleaves for fixing to garden walls and buildings
- In environmentally sensitive areas, consider omitting pay and display machines in favour of cashless payment options.

**Managing parking around schools**

113. Child casualties around schools are thankfully very rare in East Suffolk but like all schools across the country managing behaviours around the 'school-run' period, particularly the afternoon pick-up timeframe can be a particular challenge. Usually sane and rational people can exhibit inconsiderate, hazardous and extreme behaviour when doing the school-run. Residents living close to a school where such behaviour is a regular occurrence understandably wish the problem to go away.

**Are School keep-clear zigzags the answer?**

- Safety and congestion are the main concerns at the school entrance;
  - Zigzags now do not need a TRO to be enforceable. As soon as they are painted on the ground they are enforceable and mean no stopping at any time – they do still need traffic signs;
  - If zigzags are to be limited to school term times, then a traffic regulation order will be required which adds cost and delay.
  - Zigzags will not solve the school run problem; it will displace parking away from the school entrance to somewhere else.
114. These restrictions are better than nothing and are generally respected. Enforcement is an issue and the reality is we will not have enough civil enforcement officers (CEOs) to enforce all the schools in East Suffolk at any one time. This means that a CEO cannot be expected to be at the school every day.

**Policy ESAPP 11**

Where school keep clear markings are appropriate, they will only be marked on the school gate side of the road.

### Parking consultations

Legislation requires that we have regard to various factors in making a decision on whether an area should have parking controls introduced. These include the views of owners and occupiers of properties but also the need for maintaining the free movement of traffic including public service vehicles, reasonable access to premises and the effect on amenities within the locality. There may also be other matters which appear to us as being relevant which we are obliged to take into account such as the East Suffolk Business Plan.

Our proposed policy of responding to demand from residents and businesses, and of carrying out an opinion survey and detailed consultation before proposing the implementation of parking controls is based on industry best practice and is designed to provide the widest engagement opportunity for all stakeholders.

### Consultation process

We will produce a letter (or leaflet) and questionnaire that is delivered to every property in the consultation area. In this document we provide all the relevant information relating to parking controls, including costs and ask a series of questions, the responses to which will help us decide whether a scheme should be introduced and how it will operate. We will also write to other stakeholders where applicable such as town/parish councils, business representatives, disability, public transport, and emergency and haulage representatives.

### Response rates

We aim to obtain a minimum 25% response rate to our consultations by offering a range of engagement methods; post, email, and online. We will compile the results that show the individual responses from each household and business though you can be assured that these are not available for individual scrutiny to determine the views expressed by you or your neighbours. These enable us to accurately define the areas where there is support for the introduction of controls and those areas where there is not.

### Businesses

Getting businesses to respond to consultations in sufficient numbers can be a problem. We try to deliver consultation documents to businesses during their opening hours, to ensure they are received. The analysis of the questionnaire and comments also helps us to ensure that the design of a proposed zone most accurately reflects the desires of the community, be it one-hour zones, controls on Saturday or any other local factor to the area.

### Consultation results

The results of this consultation will be analysed both for the overall area and on a street-by-street basis. When examining the results we will take into account the response rate, the level of support and whether the streets involved would form a coherent zone area. We try to ensure that zone boundaries are clear so that any confusion can be avoided.

The introduction of parking controls in one street often results in displacement parking problems in adjacent streets, as commuters and other motorists may move their cars to the nearest road where parking is unrestricted. Consequently, we will consult over a wider area than that in which there are known to be current parking difficulties. In addition, we may also

ask residents and businesses, if they are not in favour, whether they would change their mind if the adjacent road became controlled. We will then take into account the results from this secondary question regardless of the overall results throughout the consultation area.

### Reporting on the consultation results

The results of parking consultations will be reported to the Cabinet who will decide if a scheme will be implemented subject to funding being available to do so.

### Introducing parking controls

For parking controls to be introduced, the Council will take into account the views of residents and businesses, as detailed above. However, customer feedback is not the single deciding factor and will be considered along with all other relevant factors, as detailed in the first paragraph.

Residents and businesses will generally be informed of the results by letter but, in any event, a copy of the Cabinet report detailing the results can always be found on our website.

Appendix B

**Opinion survey**

The opinion survey questionnaire should have a question to identify the street the response is being made about, and;

- |  |                                    |                     |
|--|------------------------------------|---------------------|
| 1. In your street do you have a parking problem? |                                    | Yes /no /don't know |
| 2. If yes is the problem,                        | a) access/junction parking issues? | Yes /no /don't know |
|  | b) finding parking on-street?      | Yes /no /don't know |
| 3. Is the problem                                | a) during the day?                 | Yes /no /don't know |
|  | b) in the evening?                 | Yes /no /don't know |
|  | c) at weekends?                    | Yes /no /don't know |
|  | d) all the time?                   | Yes /no /don't know |

(Please chose as many as applicable)

4. If you have indicated there is a parking problem in your road would you support in principle the introduction of parking controls?
- Yes /no /don't know

5. Comments

Appendix C

Detailed design questionnaire

The detailed design questionnaire should have a question to identify the street the response is being made about, and;

- 1. Does your household/business have off street parking? Yes /no  
 If no, how many vehicles park on street .....
- 2. In your street do you have a parking problem Yes /no /don't know
- If yes;
- 3. Is the problem
  - a) during the day? Yes /no /don't know
  - b) in the evening? Yes /no /don't know
  - c) at weekends? Yes /no /don't know
  - d) all the time? Yes /no /don't know

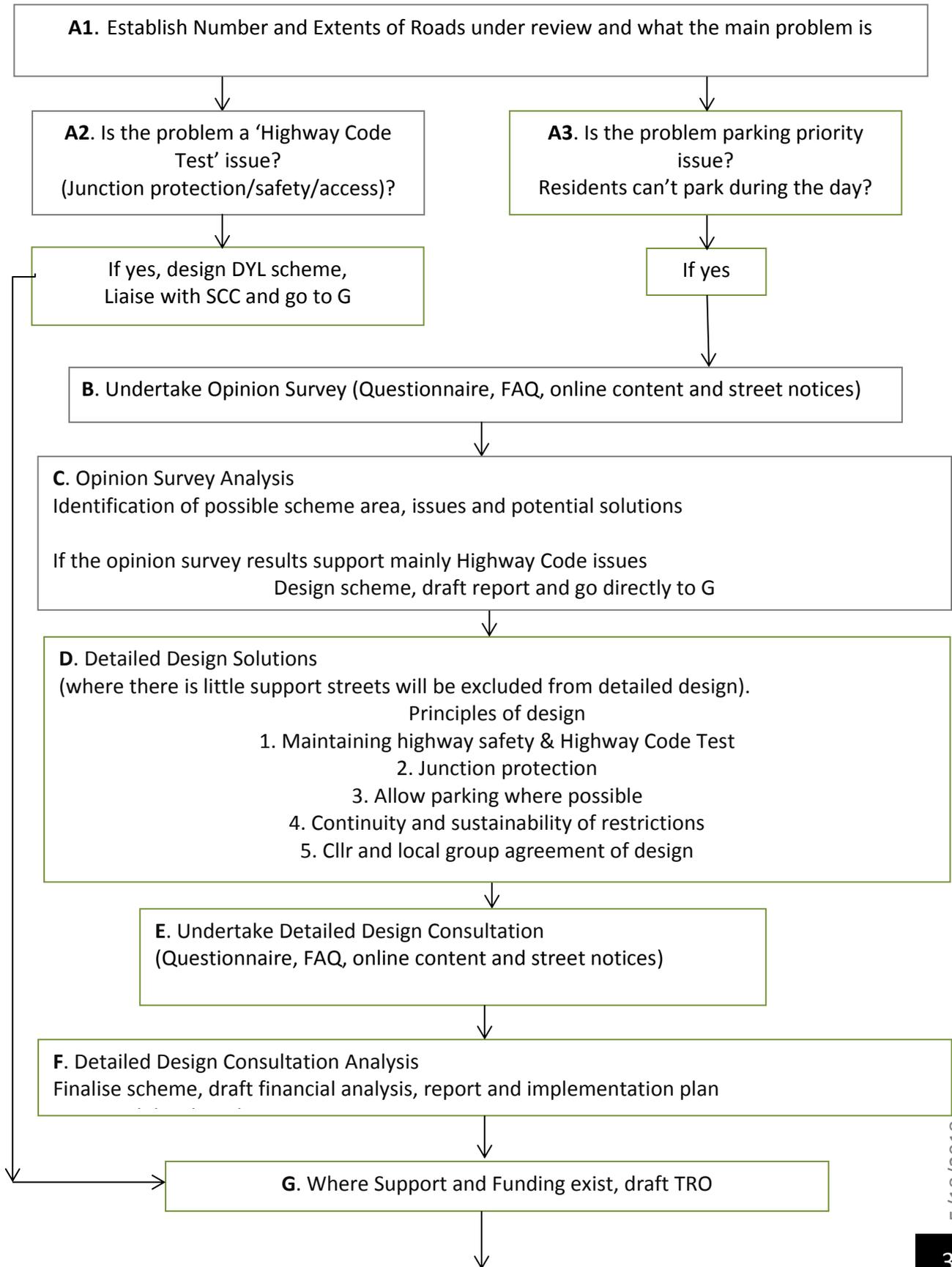
(Please chose as many as applicable)

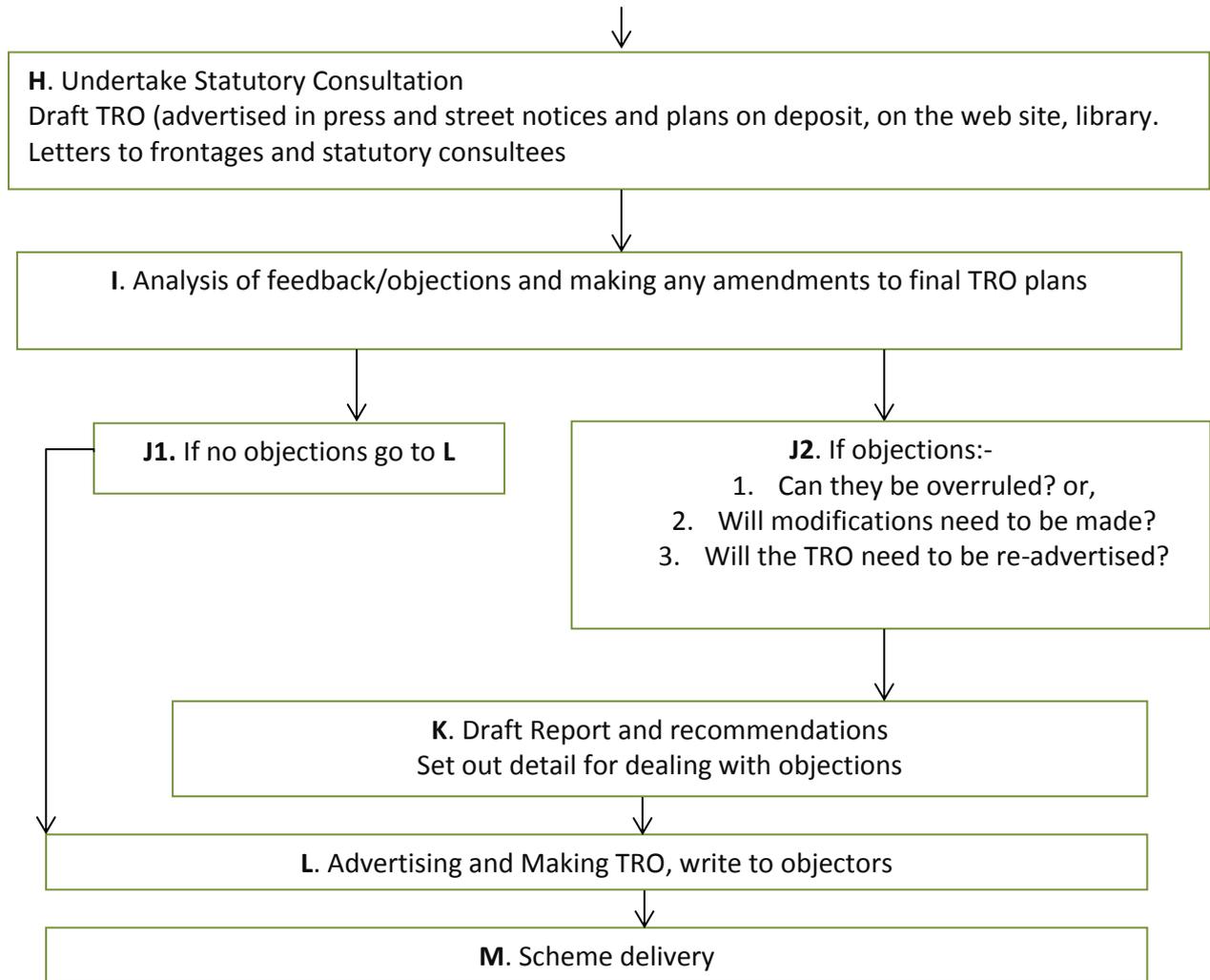
We have produced a design aimed at improving the ability to find a parking space in your area

- 4. Do you support the design for your road? Yes /no /don't know
- 5. If you said no /don't know to question 4, would your view change if controls were introduced in an adjacent street potentially displacing parking to your street? Yes /no /don't know

6. Comments

Parking Scheme Workflow Process





### East Suffolk car park tariffs from 1<sup>st</sup> April 2018

#### Suffolk Coastal tariffs 2018

Low	1/2 hour	1 hour	2 hours	2+ hours	3 hours	4 hours	4+ hours
3	Free	Free	Free	Free	Free	Free	Free
14	n/a	Free	n/a	n/a	n/a	£1.00	£1.50
23	n/a	n/a	n/a	n/a	n/a	£1.00	£2.00
15	Free	n/a	£1.00	n/a	n/a	n/a	n/a
13	Free	n/a	£0.60	£1.20	n/a	n/a	n/a
12	n/a	n/a	£1.20	n/a	n/a	£1.80	£2.30
21	n/a	Free	£1.00	n/a	n/a	n/a	n/a
22	Free	Free	£1.00	n/a	n/a	£1.50	£4.00
24	n/a	n/a	£1.00	n/a	£1.50	£3.00	£4.00
4	n/a	n/a	£1.80	n/a	n/a	£3.00	£4.10
Medium	1/2 hour	1 hour	2 hours	2+ hours	3 hours	4 hours	4+ hours
19	£0.20	£0.40	£0.60	n/a	n/a	£1.00	£1.50
8	n/a	£0.50	£1.20	n/a	£1.80	£3.00	£4.10
9	n/a	£0.50	£1.20	n/a	n/a	£1.80	£3.00
10	n/a	£0.50	£1.00	n/a	n/a	£1.20	£2.00
2	£0.40	£0.60	£1.20	n/a	n/a	£2.30	£4.60
7	£2:00 per day or part day when chargeable, coaches free 10:00-22:00.						
High	1/2 hour	1 hour	2 hours	2+ hours	3 hours	4 hours	4+ hours
11	n/a	£1.00	£1.20	n/a	n/a	£1.40	£2.30
1	n/a	£1.20	n/a	n/a	n/a	£2.30	£3.50
18	n/a	£1.20	£1.80	n/a	n/a	£3.00	£4.10
6	£0.50	£1.20	£1.40	n/a	n/a	£2.30	£6.90
16	£0.50	£1.20	£1.80	n/a	n/a	n/a	n/a
20	£0.50	£1.20	£1.80	n/a	n/a	£3.00	£6.90
5	£0.70	£1.40	£2.30	n/a	n/a	£4.10	£6.90
17	£0.70	£1.40	£2.30	n/a	n/a	£3.00	£4.10

# EAST SUFFOLK AREA PARKING PLAN

## Waveney tariffs

Low	1/2 hour	1 hour	90 mins	90 + mins	2 hours	2+ hours	3 hours	3+ hours	4 hours	4+ hours	5 hours	5+ hours
24	Free	Free	Free	Free	Free	Free	Free	Free	Free	Free	Free	Free
9	n/a	n/a	n/a	n/a	n/a	2.5 hr free limited waiting						
14	n/a	n/a	2 hr free limited waiting									
17	n/a	n/a	1 hr free limited waiting									
19	n/a	n/a	1 hr free limited waiting									
15	n/a	n/a	1 hr free limited waiting									
18	n/a	n/a	30min free limited waiting									
4	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	£2.80
6	n/a	n/a	n/a	n/a	n/a	n/a	£5.00	£7.50	n/a	n/a	n/a	n/a
16	n/a	n/a	n/a	n/a	£1.40	n/a	£2.10	n/a	£2.80	£3.50	n/a	n/a
22	n/a	n/a	n/a	n/a	£1.40	n/a	£2.10	n/a	£2.80	£3.50	n/a	n/a
Medium	1/2 hour	1 hour	90 mins	90 + mins	2 hours	2+ hours	3 hours	3+ hours	4 hours	4+ hours	5 hours	5+ hours
1W	n/a	n/a	£1.00	£2.80	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	n/a	n/a	£1.00	£2.80	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
21W	n/a	n/a	£1.00	£2.80	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
3	n/a	£0.70	n/a	n/a	£1.40	n/a	£2.10	n/a	£2.80	£3.50	n/a	n/a
10	n/a	£0.70	n/a	n/a	£1.40	n/a	£2.10	n/a	n/a	n/a	n/a	n/a
20	n/a	£0.70	n/a	n/a	£1.40	n/a	£2.10	n/a	n/a	n/a	n/a	n/a
23	n/a	£0.70	n/a	n/a	£1.40	n/a	£2.10	n/a	£2.80	£3.50	n/a	n/a
High	1/2 hour	1 hour	90 mins	90 + mins	2 hours	2+ hours	3 hours	3+ hours	4 hours	4+ hours	5 hours	5+ hours
1S	n/a	£1.00	n/a	n/a	£2.00	n/a	£3.00	n/a	£4.00	£5.00	n/a	n/a
2	n/a	£1.00	n/a	n/a	£2.00	n/a	£3.00	n/a	£4.00	£5.00	n/a	n/a
12W	n/a	£1.00	n/a	n/a	£2.00	n/a	£3.00	n/a	£4.00	£5.00	n/a	n/a
21S	n/a	£1.00	n/a	n/a	£2.00	n/a	£3.00	n/a	£4.00	£5.00	n/a	n/a
8	n/a	£1.10	n/a	n/a	£1.70	n/a	£2.50	n/a	£3.40	n/a	£4.50	£5.60
12S	n/a	£1.10	n/a	n/a	£2.20	n/a	£3.30	n/a	£4.40	£5.50	n/a	n/a
5	n/a	£1.20	n/a	n/a	£2.40	n/a	£3.60	n/a	n/a	n/a	n/a	n/a
13	n/a	£1.20	n/a	n/a	£2.40	n/a	£3.60	n/a	£4.80	£6.00	n/a	n/a
11	Blue Badge double time											