

Cabinet

Tuesday, 20 November 2018

RESULT OF THE STAKEHOLDER CONSULTATION ON THE DRAFT EAST SUFFOLK AREA PARKING PLAN (REP1904)

EXECUTIVE SUMMARY	
1.	The Secretary of State for Transport expects every local authority to have clear parking policies and what it intends to achieve by them irrespective of it having responsibility for enforcement. Local authorities are also expected to regularly review and consult on its parking policies.
2.	Cabinets approved stakeholder consultation on the content of the draft East Suffolk Area Parking Plan (ESAPP) at its June meetings and stakeholder consultation took place during July and August 2018.
3.	There were 75 responses overall which is consider good for this type of consultation. Overall, every policy principle was supported with the highest level of support 92% (principle 2) and the lowest at 61% (principle 11) and a mean of 72% in support of the policies.
4.	The detailed results of the stakeholder consultation are summarised in this report and any proposals for changes to the text are set out in the main body of the report.
5.	For decision.

Is the report Open or Exempt?	Open
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Wards Affected:	All
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Cabinet Member:	Cllr Graham Catchpole, Cabinet Member for Operational Partnerships
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1 INTRODUCTION

- 1.1 The Secretary of State for Transport expects “each local authority should have a clear idea of what its parking policy is and what it intends to achieve by it. This applies whether or not an authority is responsible for enforcement. They should appraise their policy and its objectives regularly.”
- 1.2 Local authorities applying for CPE powers need to provide evidence of its parking policies and strategies and the management review that has taken place to ensure they remain relevant and fit for purpose after CPE is granted.
- 1.3 In order to fulfil the requirement the Suffolk Civil Parking Enforcement Working Group (SCPEWG) agreed a two-part process. The County Council produced the Suffolk Parking Management Strategy (SPMS) which is the high level policy document and consulted on the content during the spring. Each enforcement district will produce its own Area Parking Plan and carry out public consultation on its content. These documents will be submitted to the DfT in support of its application for CPE powers.
- 1.4 Cabinet at its June meeting approved the draft content of the East Suffolk Area Parking Plan (ESAPP) and approved stakeholder consultation on its content to take place over the summer. This was to meet the timeline for document submission to the DfT by the autumn.
- 1.5 The Department for Transport (DfT) have taken four months to respond to the County Council’s offer to assist in drafting the statutory instrument for CPE. In their letter of the 30th July the DfT refused the Suffolk offer and confirmed that due to Brexit they would not be in a position to grant CPE for Suffolk for April 2019. A copy of the letter is contained in Appendix A.
- 1.6 The DfT have again refrained from providing any timescale when they will be in a position to grant CPE for Suffolk which is not helpful with contingency planning. Realis point of view. Officers continue to press for a definitive date and it is hoped that a planned meeting with the local MPs and the Secretary of State may be able to get some form of commitment to a delivery date.

2 STAKEHOLDER CONSULTATION

- 2.1 Stakeholder consultation on the ESAPP commenced on the 10th July 2018 and initially ran until the 17th August but was extended until the 31st August 2018 to allow greater time to formulate a response. A press release inviting the public to participate and a link to the consultation documentation and online questionnaire was placed on the council’s website.
- 2.2 An invitation to participate in the consultation was emailed to every parish council, parish meeting and town council on the East Suffolk database along with invitations to neighbouring authorities in Suffolk and Norfolk.
- 2.3 Invitations were also emailed to every East Suffolk district and county councillor and local MPs. Invitations were also sent to organisations representing access groups, local public transport providers, local business groups, the ports, road users, and the Statutory Consultees (e.g. emergency services, Freight Transport Association, Road Haulage Association).
- 2.4 The ESAPP contains eleven broad parking policy statements which aim to set out what the parking plan is and what it is intended to achieve. There are no policies for a specific location or area. Respondents were asked to select one of five options that most closely represented their viewpoint against each policy statement (strongly agree, agree, indeterminate, disagree, or strongly disagree). Respondents were also able to make comments on-line. A number of respondents chose to email their response and comments rather use the online questionnaire facility.

2.5 The results of the stakeholder consultation on the draft ESAPP have been analysed along with comments received. The analysis of the online consultation is set out in section 3.

3 RESULTS OF THE CONSULTATION

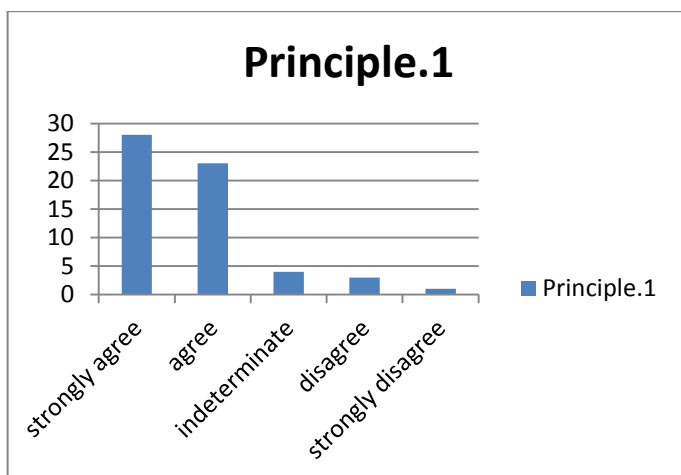
3.1 The overall number of responses to the stakeholder consultation was 75; 15 via email, 59 via the online questionnaire and 1 who used a written pdf format of the online questionnaire.

3.2 The headline results show broad support for all of the principles/policies set out in the ESAPP with the highest at 92% support, the lowest at 61% and a mean of 72%. The email responses had a tendency to make broader comments and these are analysed separately in section 4. The questionnaire responses are analysed below.

Principle 1 – The East Suffolk Vision for Parking is “to provide parking where possible and control parking where necessary”.

3.3 There were 59 responses. Of those responding, 51 (86%) either agreed or strongly agreed, 4 (7%) neither agreed nor disagreed (indeterminate), and 4 (7%) either disagreed or strongly disagreed with the policy. There were 4 additional comments.

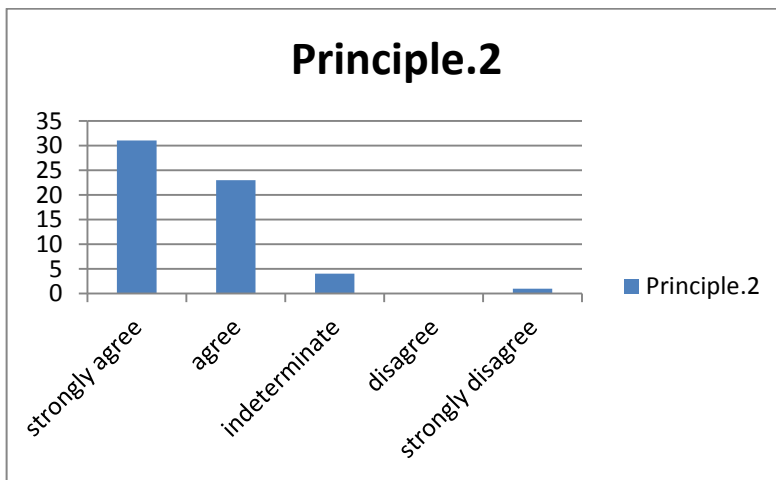
3.4 Of the 4 comments received, 1 reinforced the strong support and the other comments were not directly relevant.



Principle 2 – Off-street parking places will be provided to assist with traffic management, environmental issues, as well as to support and promote our communities.

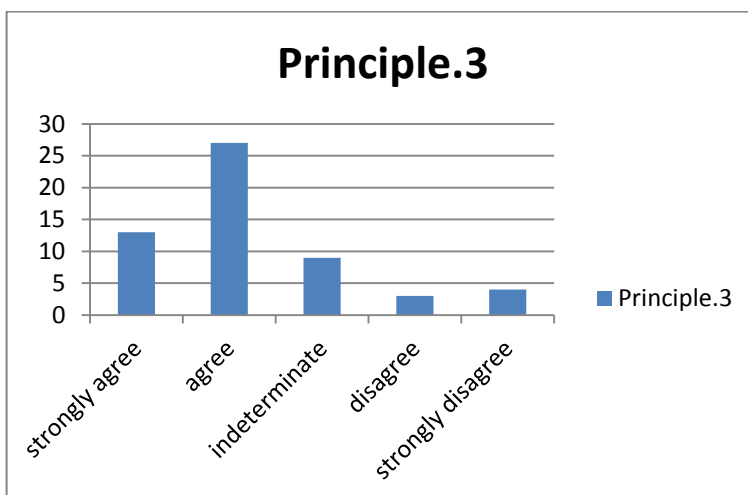
3.5 There were 59 responses. Of those responding, 54 (92%) either agreed or strongly agreed, 4 (7%) neither agreed nor disagreed (indeterminate), and 1 (2%) either disagreed or strongly disagreed with the policy. There were 5 additional comments.

3.6 Of the 5 comments received, 1 wanted resident parking in Woodbridge, 2 asked questions, 1 supported the principle provided the car parks were run by SCC and 1 wanted a policy for electric vehicles.



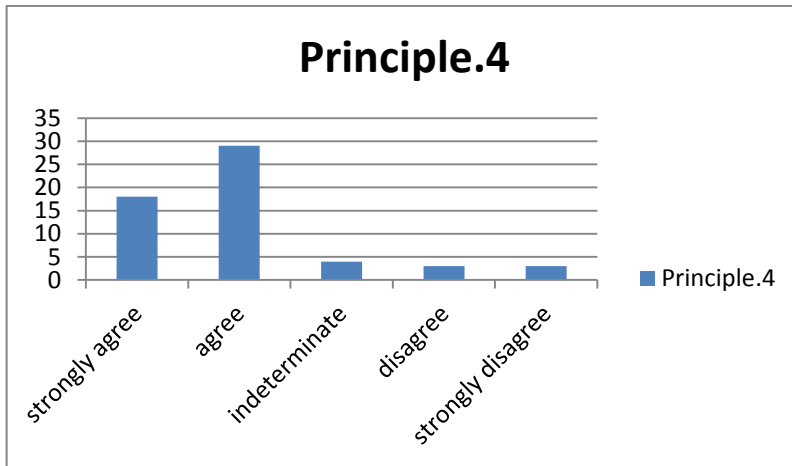
Principle 3 – A single new East Suffolk off-street parking places traffic regulation order will be drafted to take account of the legal formation of the new authority. Where possible, the tariffs, terms and conditions of use will be simplified and harmonised throughout East Suffolk. Planned changes will 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.

- 3.7 There were 56 responses. Of those responding, 40 (71%) either agreed or strongly agreed, 9 (16%) neither agreed nor disagreed (indeterminate), and 7 (13%) either disagreed or strongly disagreed with the policy. There were 10 additional comments.
- 3.8 This principle received the most comments. Of the 10 comments received, 9 were directly related to the principle. 2 comments asked questions, 1 comment wanted free parking in town centre car parks to increase footfall, 1 comment was erroneously concerned that Cambridge tariffs would be introduced, 2 comments were concerned that it was an excuse to raise charges, the 3 other comments broadly support the principle while commenting on the need for local factors to be taken into account when setting the tariffs.



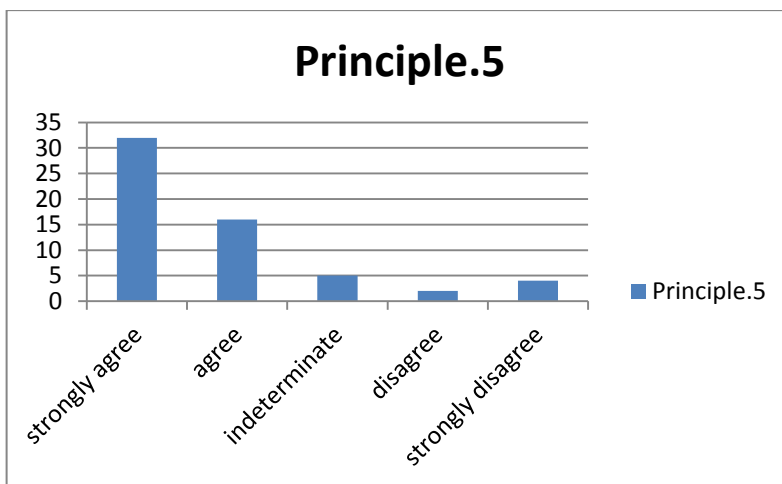
Principle 4 – A review of current on-street restrictions will be carried out in East Suffolk after the elections for the new authority in 2019.

- 3.9 There were 57 responses. Of those responding, 47 (82%) either agreed or strongly agreed, 4 (7%) neither agreed nor disagreed (indeterminate), and 6 (11%) either disagreed or strongly disagreed with the policy. There were 7 additional comments.
- 3.10 Of the 7 comments received, 3 broadly supported the principle, 1 comment stated it was too late, 1 comment wanted resident parking controls in Woodbridge, 1 comment was the need for electric charging provision, and 1 comment was about the need for effective enforcement.



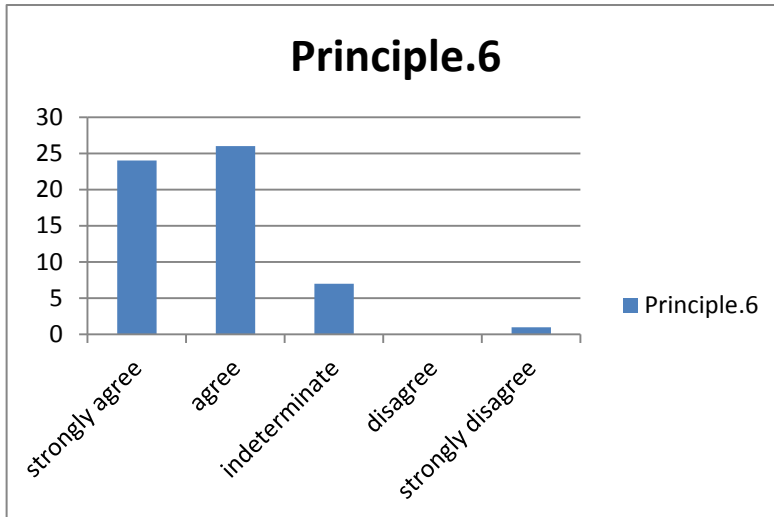
Principle 5 – Parking schemes that pass the ‘Highway Code Test’ will be progressed without the need for extensive informal consultation. Only the statutory (formal) consultation process set out in the traffic regulation order process will be followed.

- 3.11 There were 59 responses. Of those responding, 48 (81%) either agreed or strongly agreed, 5 (8%) neither agreed nor disagreed (indeterminate), and 6 (10%) either disagreed or strongly disagreed with the policy. There were 4 additional comments.
- 3.12 Of the 4 comments received 3 supported the principle and 1 clearly misunderstood the principle.



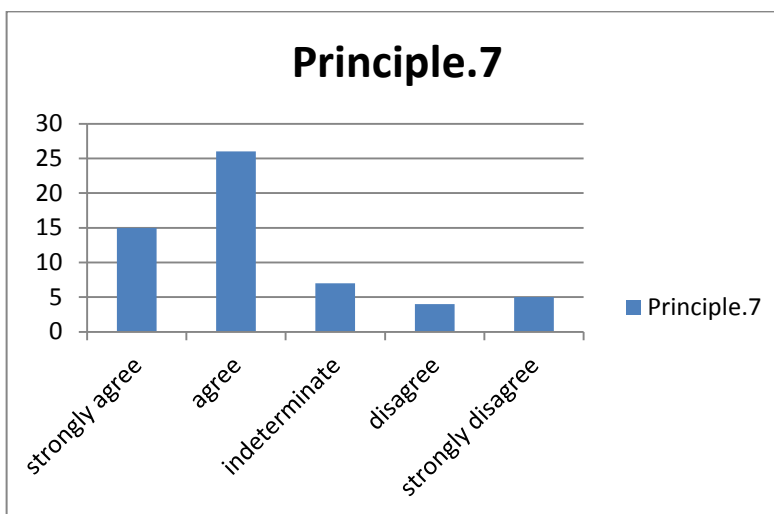
Principle 6 – Parking scheme development, other than ‘Highway Code Test’ schemes, we will use local engagement such as opinion surveys, detail design consultation and statutory consultation as the standard procedure.

- 3.13 There were 58 responses. Of those responding, 50 (86%) either agreed or strongly agreed, 7 (12%) neither agreed nor disagreed (indeterminate), and 1 (2%) either disagreed or strongly disagreed with the policy. There were 5 additional comments.
- 3.14 Of the 5 comments received, 4 were directly related to the principle. 2 comments supported the principle of local engagement, 1 comment was concerned that the results of the consultation would be used and one comment was convinced that no notice would be taken of any consultation results.



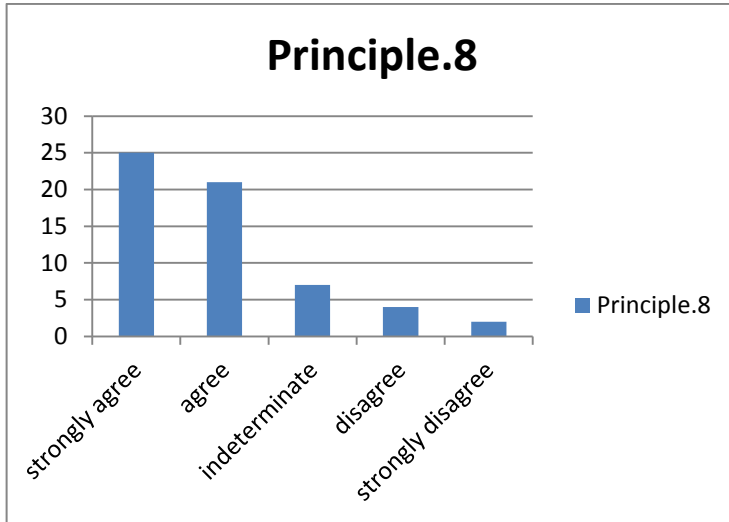
Principle 7 – New on-street parking schemes will be implemented with standard operational hours of Monday to Friday between 9:30am – 4:30pm, with the potential to add Saturdays. Longer operational hours – generally up to 6:30 or 7pm - will only be considered where there is compelling evidence of its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

- 3.15 There were 57 responses. Of those responding, 41 (72%) either agreed or strongly agreed, 7 (12%) neither agreed nor disagreed (indeterminate), and 9 (16%) either disagreed or strongly disagreed with the policy. There were 8 additional comments.
- 3.16 Of the 8 comments received 2 were not directly related to this principle. The 6 remaining comments were all concerned that local factors would need local times taken into account.



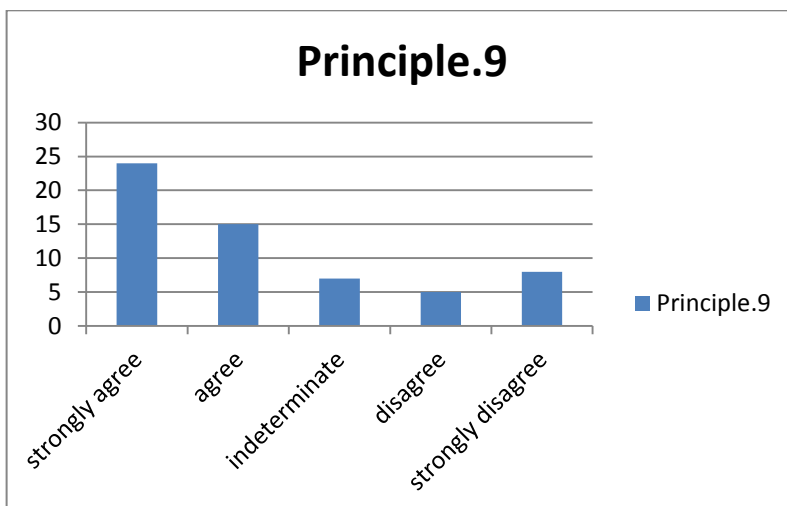
Principle 8 – Advisory Blue Badge bays will be used in residential areas for residents meeting the eligibility criteria and the carriageway will be marked out accordingly.

- 3.17 There were 59 responses. Of those responding, 46 (78%) either agreed or strongly agreed, 7 (12%) neither agreed nor disagreed (indeterminate), and 6 (10%) either disagreed or strongly disagreed with the policy. There were 8 additional comments.
- 3.18 Of the 8 comments received, 1 comment was not directly related to this principle, 2 comments related to specific locations, 4 comments were about effective enforcement of disabled bays and 1 comment did not support the use of advisory disabled bays.



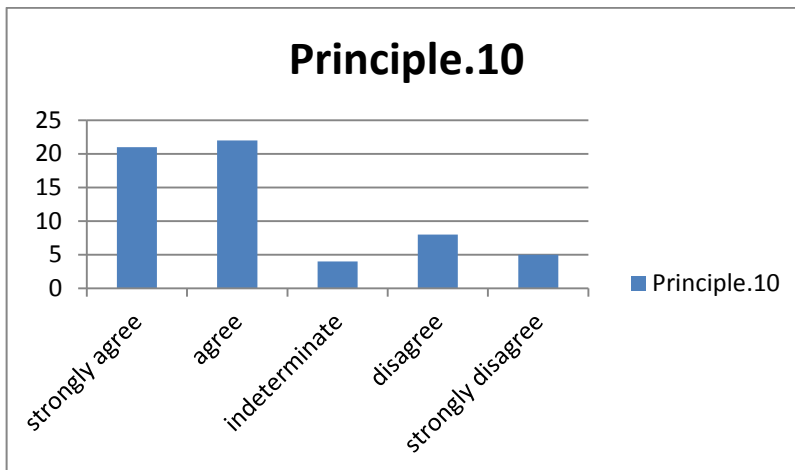
Principle 9 – Footway parking measures will only be implemented: where damage to the footway construction and underground services are unlikely to be compromised; after the ‘double buggy’ test; and, only with agreement from local councillors. Where allowed, appropriate signage will be installed.

- 3.19 There were 59 responses. Of those responding, 39 (66%) either agreed or strongly agreed, 7 (12%) neither agreed nor disagreed (indeterminate), and 13 (22%) either disagreed or strongly disagreed with the policy. There were 8 additional comments.
- 3.20 Of the 8 comments received, 1 was not directly related to this principle. 6 comments were opposed to footway parking and 1 comment did not want any more signs.

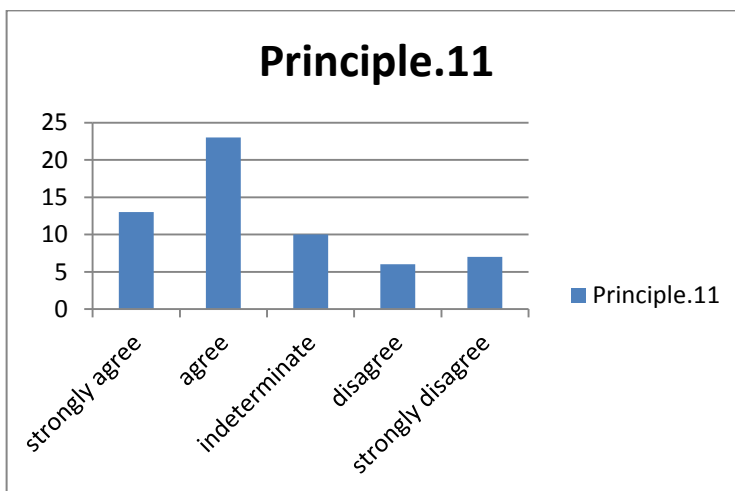


Principle 10 – Parking schemes will be designed and implemented, with the aim of reducing street clutter.

- 3.21 There were 60 responses. Of those responding, 43 (72%) either agreed or strongly agreed, 4 (7%) neither agreed nor disagreed (indeterminate), and 13 (22%) either disagreed or strongly disagreed with the policy. There were 8 additional comments.
- 3.22 Of the 8 comments received, 1 comment was not related to the principle, 1 comment supported of the principle, 1 comment thought it was too big an issue to consider, 2 commented that clarity and common sense must prevail, and 3 comments were concerned about the use of cashless parking.



Principle 11 – ‘School Keep Clear’ markings, where they are appropriate, they will only be marked on the school gate side of the road (yellow lines could be used on the other side of the road).



- 3.23 There were 59 responses. Of those responding, 36 (61%) either agreed or strongly agreed, 10 (17%) neither agreed nor disagreed (indeterminate), and 13 (22%) either disagreed or strongly disagreed with the policy. There were 8 additional comments.
- 3.24 Of the 8 comments received, 1 comment related to traffic calming in Beccles, 2 comments wanted to see red routes used instead (not possible), 3 comments wanted to see zig-zag markings on both sides of the road, and 2 comments did not want to see any markings used on the highway.

4. ANALYSIS OF COMMENTS

- 4.1 There were a total of 18 email responses to the consultation, 7 from private individuals (3 individuals sent follow up emails), 6 from parish/town councils, 1 from the East Suffolk Disability Advice Service and 1 from Babergh/Mid Suffolk. A copy of all email comments received and the response to them is contained in Appendix B.
- 4.2 A number of the comments did not specifically relate to the principles set out in the area parking plan; one was concerned with a personal ECN case, another with electric highway charging points across Suffolk (which is the responsibility of SCC) and the remainder about enforcement on the highway post CPE.
- 4.3 **Specific local parking issues** – a number of the comments were concerned about specific parking issues at:-
- Framlingham – progress of resident parking scheme;
 - Orford – village centre parking and access issues;
 - Woodbridge – more car parks; and, request for on-street resident parking controls;
 - Cavendish Road, Felixstowe – request for resident parking;
 - Aldeburgh – town centre parking issues;
 - Southwold – town centre parking issues.
- 4.4 The majority of the policy related comments reinforced the principles set out in the draft but there were others which made suggestions or raised queries which merit further consideration. The principles and wording set out in policies ESAPP 1 – 5, ESAPP8 – 9 and ESAPP11 are supported and do not need any change to the wording.

ESAPP 6

- 4.5 While the wording for ESAPP 6 itself does not need changing, there was a comment/query about understanding the level of support that would be needed to progress a parking scheme. This relates to the wording in Appendix A of the ESAPP which sets out the consultation process in greater detail. It is proposed to make the changes to the wording highlighted below to provide clarity.

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 overall response rate, the level of support and whether the streets where there is a straightforward majority support for controls involved would form a coherent zone area. We try to ensure that zone boundaries are clear so that any confusion can be avoided.

TRAFFIC REGULATION ORDER SECTION

- 4.6 The traffic regulation order section provides detail on the legal process for implementing waiting, loading and parking controls but is probably too detailed for the main content of the ESAPP. It is proposed to relocate paragraphs 80 – 83 to Appendix F and renumber the subsequent paragraphs.

ESAPP 7

- 4.7 There were a number of comments about the proposed operational hours of new parking controls set out in ESAPP 7. It was always the intention that different operational hours and days of control would be considered where there was evidence of the need for them. As this did not come across sufficiently clearly in the draft, it is proposed to make the following amendments to the wording:-

(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. Working day controls (e.g. 08:30am- 6:30pm) are generally used in business/ retail centres and for yellow line controls are probably appropriate in most circumstances. Parking bay controls do not have to follow the same convention and it may be desirable to have a period of unrestricted parking at the start and/or end of the working day.

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 and/or Sunday.
- Longer operational hours – in the morning and or late afternoon/early evening generally up to 6:30 or 7pm will only be considered where there is compelling evidence of need.

ESAPP 10

- 4.8 There were a number of comments about the proposal to use cashless parking alternatives in environmentally sensitive areas or where footways are particularly narrow. It was never the intention that cashless parking would be the only means of paid parking and it is proposed to make the following amendment to the wording:-

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 some pay and display machines in favour of cashless payment options.

4.9 The finalised version of the East Suffolk Area Parking Plan subject to the adoption of the proposals can be found in Appendix C.

5 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

5.1 The East Suffolk Area Parking Plan makes reference to and accords with the objectives of the Business Plan.

6 FINANCIAL AND GOVERNANCE IMPLICATIONS

6.1 The Area Parking Plan is a living document and will need regular updating to ensure it remains relevant. It is proposed that factual or administrative updates will be made after agreement with the Portfolio Holder and Officer responsible for parking operation. Proposed policy changes or amendments would be brought to Cabinet for a decision.

6.2 The cost for the development and potential implementation of parking schemes to address the requests in paragraph 4.3 of this report post CPE would need to be funded by the District Council(s) from any surplus in its parking account or from the District Councils reserves.

6.3 Prior to CPE being adopted the cost for developing on-street parking schemes is the responsibility of the County Council and is funded from the OSPA (on-street parking account). It is recommended that a bid for funding is immediately made to the County Council for the areas listed in paragraph 4.3 to be funded from the OSPA account.

7 CONSULTATION

7.1 Following approval of the draft by Cabinet in June, stakeholder consultation with town and parish councils and other interested individuals and groups has taken place during July and August. The level of engagement and the overall response demonstrates that the consultation was successful. The number of responses is comparable with that carried out by the County Council for the draft Suffolk Parking Management Strategy earlier in the year. The results of the consultation on the ESAPP can be reliably used to inform the decision making by Cabinet.

8 REASON FOR RECOMMENDATION

8.1 Legislation requires the Council to have a parking policy and to demonstrate that it has reviewed the content. This report sets out the results of the consultation and based on the analysis of the consultation makes recommendations for the adoption of the ESAPP.

RECOMMENDATIONS

That Cabinet agrees the following recommendations-

1. The acceptance of the results of the stakeholder consultation;
2. The proposed changes to the wording of the ESAPP set out in paragraphs 4.4 – 4.8 of this report;
3. The formal adoption and publication of the East Suffolk Area Parking Plan and the policies it contains as a living document;
4. Factual and administrative updates to the East Suffolk Area Parking Plan are agreed and made with agreement of the Portfolio Holder;
5. A bid submitted to the County Council for OSPA funding for the investigation and development of parking controls for the areas listed in paragraph 4.3.

APPENDICES	
Appendix A	Letter from the Secretary of State for Transport 30 th July 2018
Appendix B	Analysis of Email comments
Appendix C	Finalised East Suffolk Area Parking Plan

BACKGROUND PAPERS
None