

APPENDIX A**1. Executive Summary**

- 1.1 The creation of a single new East Suffolk Off-street Parking Places Order and tariff structure will require aligning the content of the separate Waveney and Suffolk Coastal Orders and tariffs.
- 1.2 Neither District follows the same approach to the layout and content of the Order or tariff structure although most of the provisions are in essence the same. The simplest and most appropriate procedure would be to revoke the existing Orders and tariffs and create a single new 'parent' traffic regulation order (TRO) and tariff for East Suffolk. As part of this process there is a need to:
 - modernise the structure and wording for the new Order;
 - rationalise and bring consistency to the terms and conditions of use;
 - align the level of charge for the discounted excess charge notice (ECN) and the applicable period; and
 - re-purpose the current tariff structure that operates across the two districts.

This paper sets out the process for simplifying/aligning the tariff structures.

2. Background

- 2.1 The Suffolk Coastal Cabinet revised the Coastal District car park tariffs in 2018 which became operational in April. The current Waveney District car park tariffs were created in 2016. The draft East Suffolk Area Parking Plan includes a commitment to undertake a full review and alignment of all car park tariffs for East Suffolk in the summer of 2019.
- 2.2 In advance of the 2019 review, there are some changes which are necessary now to enable a single East Suffolk car park tariff structure to be created rather than separate Coastal and Waveney tariffs. Making these changes now will also make the 2019 tariff review easier to achieve.
- 2.3 The proposed alignment aim to:
 - a) Adopt standard terminology;
 - b) Adopt a standard excess charge notice (ECN) charging structure for East Suffolk;
 - c) Adopt a standardised parking time/length of stay structure;
 - d) Adopt standard operational days;
 - e) Insert four tariff headings within the tariff structure for ease of use;
 - f) Renumber the Coastal and Waveney existing tariffs under the new headings.
 - g) Remove the 90 minute and 90+ minute from the tariff structure;
 - h) Remove the 2 ½ hour maximum length of stay;
 - i) Remove seasonal tariff changes;

Adopt standard and simplified terminology

Season tickets

- 2.4 The layout and terminology used in both tariff structures is broadly the same but there are some inconsistencies in terms of use which will need to be resolved. Both tariff structures allow for the purchase of season tickets for the same 5 time periods but use different terminology for the same product. It is proposed to adopt the same terminology as shown below:
- weekend (and Bank Holiday) only;
 - weekly;
 - monthly;
 - quarterly; and,
 - annual.
- 2.5 In the Waveney TRO/tariff structure, there is reference to season tickets and 'period tickets' but no clarification of what is meant by 'period tickets'. This presumably is a throwback to some earlier type of concession which is no longer in use and should have been deleted at the time. It is recommended that the term 'period tickets' is removed from the tariff structure and TRO.
- 2.6 In the Coastal TRO/tariff structure, the weekend season ticket is referred to as a 'weekend recreational ticket'. It is again unclear what is intended by the addition of 'recreational' as the terms of use are the same as the Waveney weekend season ticket. It is recommended that recreational is dropped from the terminology and the season ticket is called a weekend season ticket.
- 2.7 In the Coastal TRO/tariff structure the weekly season ticket is called a 'visitor/tourist ticket' when in fact anyone can purchase it. This is again misleading and it is recommended that this terminology is changed to 'weekly season ticket' to achieve consistency.
- 2.8 There are a number of Waveney car parks which are provided for resident permit holder use only. These should be separated from the public car park tariff structure to avoid confusion.

Vehicle restriction

- 2.9 It is usual for car park owner/operators to restrict the use of the car park according to the size and/or weight of the vehicle. This is generally for practical purposes such as to avoid damage to the car park structure and often reinforced with practical measures such as height barriers and width restrictors at entry/exit points.
- 2.10 Local authorities generally set out the vehicle use/class of vehicle restriction in the main TRO. The Waveney and Coastal TROs generally do not follow this convention; instead the vehicle restrictions are primarily set out in the tariff structure which is considered less robust.

2.11 The Waveney and Coastal tariffs set out in columns those vehicles/types of vehicle which are allowed to use the various car parks. The Waveney tariff uses the following specifications:-

- a) Motor cars, motorcycles with sidecars, invalid carriages and LCVs only (the majority 63No.);
- b) Motor cars, motor cycles with side cars, invalid carriages, LCVs and caravans subject to Article 4(6) (5No.);
- c) Motor cars, motor cycles and invalid carriages only (2No.);
- d) All classes of vehicles other than HGVs and PSVs (1No.);
- e) HGVs, PSVs and Motorised Caravans (large) (1No.);
- f) PSVs and Motorised caravans (large) only (1No.);
- g) PSVs only (1No.);

2.12 The majority of Waveney tariffs (a and b above) do not reference solo motorcycles (i.e. motorcycles without a sidecar). This is not logical and presumably a drafting error which needs correcting.

2.13 The Coastal tariff uses the following specifications:-

- a) PSVs & coaches;
- b) LCVs under 3.5T;
- c) Commercial vehicles over 3.5T;
- d) Motorised caravans;
- e) Small motorised caravans;
- f) Caravans/trailers;
- g) Unhitched trailers.

2.14 The Suffolk Coastal tariffs do not reference car parks or tariffs where cars, solo motorcycles or motorcycles with a sidecar can park. This is not logical and presumably a drafting error which needs correcting.

2.15 The Coastal tariff structure also uses the term 'as cars' in relation to some other classes of use (LCVs, and/or motorised caravans, and/or small motorised caravans, and/or caravans/trailers, and/or unhitched trailers). The problem with this format is there is no definition in the TRO nor the tariff structure to what a car is or what the term 'as cars' means.

Caravan definition

2.16 The Waveney caravan definition is set out in the 2016 TRO Articles and references section 29 of the Caravan Sites and Control of Development Act 1960. This particular section defines a caravan as both towed and static. This is too broad a definition for practical use in a car park terms and conditions of use and something more prescriptive needs to be adopted that controls/restricts the size and weight of a caravan

2.17 The Coastal "Caravan" definition is set out in the 2008 TRO Articles. It does not reference primary legislation, instead it writes its own definition as

“a mechanically propelled vehicle or vehicle which can only be moved on a public highway if towed by or carried on another vehicle, in any such case, designed, constructed or adapted to provide cooking, eating, washing and sleeping facilities (or any of such facilities) for one or more persons, but does not include any commercial vehicle”;

- 2.18 Neither District caravan definition provides any limit to the size or weight of a caravan nor how it is transported. If caravans are to be allowed to use the car parks it is desirable to place limits on the type, size and weight to protect the asset and to place a limit that only towed caravans are allowed to use the car park. It is recommended that if caravans are to be allowed to use the car parks the following limitations are applied:
- a) Only towed caravans and vehicle with a combined weight of less than 3,500kg (3.5T) can park.

Motorised caravans

- 2.19 The Coastal 2010 amendment/variation Order inserts a definition of:
- “Motorised caravans (small)” which means a motorised or self-propelled caravan, camper van, dormobile, motorhome or similar vehicle or other vehicle adapted for human habitation whether permanent or temporary under 5.5 metres (18 feet) in length and 2 metres (6.6 feet) width.

This can be simplified by adopting the same 3.5T weight restriction.

Light commercial vehicles (LCV)

- 2.20 Light commercial vehicles (LCV) are allowed in the Waveney car parks but in the Coastal car parks roughly 50% prohibit their use. The LCV definition is problematic insofar as some vehicles which are based on car configuration (e.g. estate shape vans) or some SUV (sport utility vehicle) fall within the LCV definition but are used like ordinary cars. Both fall within the category of under 3.5T which makes it odd that some Coastal car parks restrict their use. It is recommended that this anomaly is removed to allow the simple under 3.5T category to be used across all car parks in East Suffolk.

Minibuses

- 2.21 The Coastal TRO provides a loose definition of what a minibus is but there is nothing in the TRO or tariff structure to indicate if they can park in the car parks. There are provisions for the control of PSV/Coaches within the TRO/tariff structure. Legislation defines a PSV or coach as a vehicle which is used to carry eight or more passengers for hire or reward. A school minibus for example is not a PSV. Most but not all minibuses are over 3,500kg but less than 7,500kg.
- 2.22 HGVs can park in Belvedere Road car park (Lowestoft). Quay North car park in Beccles allows all classes of vehicles except HGV and PSV.

2.23 Vehicles in the UK are only plated with weight information above 7,500kg (1,653Lbs)) which can be readily checked by the parking attendant/CEO. An attempt has been made in the Coastal TRO and tariff structure to differentiate between the sizes of motorised caravans which can use the car parks. It would be more logical to use definitions which the parking attendant/CEO can enforce. A simpler and less subjective approach would be to base the definition on the government categorisation based on the weight of the vehicle. Using this split would allow It would be more logical to determine vehicle categories is can be simplified in line with the government categorisation based on vehicle weight.

Proposed classification by weight

2.24 It is proposed to set the majority of car park restrictions as:

- a) Vehicles under 3.5T (this includes cars, motorcycles, invalid carriages, LCVs, small motorised caravans).

Where larger/heavier vehicles are allowed:

- b) Vehicles under 7.5T (this includes large motorised caravans, minibuses, trucks, and some PSV).
- c) HGV (Vehicles over 7.5T)
- d) PSV (this includes vehicles with 9 or more passengers for hire or reward – buses or coaches).

Charging tariffs

2.25 There are currently 51 different charging tariffs operating in car parks across the East Suffolk area (24 in Coastal and 27 in Waveney). This is a far greater number than is reasonably logical for the size of portfolio. Quite a few of the tariffs are basically the same as others or so similar that the rationale for the difference is unclear. From an operational point of view and the view of the motorist using the car parks it would be beneficial for the tariff structure to be simplified and to be more consistent.

Standardised parking time/length of stay

2.26 Within the Coastal and Waveney tariff structure there are differing lengths of parking time and/or length of stay allowed. Most follow a similar approach based on an hourly progression of ½ hour, 1 hour, 2 hour, 3 hour etc. It is recommended that this will be adopted as the basis for the East Suffolk tariff structure.

Standardised operational days

2.27 Within the Waveney tariff structure all car parks have operational controls that operate every day. The majority of the Coastal car parks do the same. The exceptions are in the market towns of Framlingham, Leiston, Saxmundham and Wickham Market where the car park controls do not apply on Sunday.

2.28 Traffic on Sunday is increasing year on year and with it the need for vehicles to park. It is logical that car park controls should reflect the increasing use of car parks on a Sunday and to ensure that all the terms and conditions of use are applicable every day. It is recommended that seven day controls will be adopted as the basis for the East Suffolk tariff structure.

Remove 90 minute parking

2.29 Within the Waveney tariff structure there is the use of one 90 minute tariff structure (£1 for 90-minutes and £2.80 for 90+ minutes [all-day]) that applies in a limited number of Lowestoft car parks (Belvedere Road, Clifton Road, Pakefield Road and Pakefield Street [tariff No.7]). The 90 minute structure does not exist anywhere else and is not in the Coastal structure.

2.30 In order to simplify and harmonise the tariff structure it is proposed that the 90 minute/all day tariff is changed to an hourly rate. Rather than creating another new tariff band it is proposed to adopt one of the existing tariffs that closely match. There are three possible options:-

- a) £1.40/2hrs, £2.10/3hrs, £2.80/4hrs, £3.50/all day (Bungay tariffs);
- b) 70p/1hr, £1.40/2hrs, £2.10/3hrs, £2.80/4hrs, £3.50/all day (Lowestoft tariff);
- c) £2.80/all day (Lowestoft tariff).

It is recommended that option b) is adopted.

2.31 In another instance (in Lowestoft) the standard hourly tariff structure changes in October to a 90 minute structure and then changes back to an hourly tariff at the end of March (Boulevard [tariff No.21W] and Nicholas Everitt & Overflow [tariff No.1W]). This is bureaucratic to administer and confusing for the motorist. It is recommended that the use of the 90 minute winter tariff is dropped and the summer tariff is retained throughout the year.

Remove 2 ½ hr free limited waiting

2.32 The Water Lane leisure centre car park allows free parking for a maximum 2 ½ hour length of stay. This does not fit in with the standardised approach and it is recommended that this tariff (tariff 9) is changed to the maximum 2 hour length of stay tariff (tariff 14) which already exists within the current structure.

All-day tariff

2.33 Waveney and Coastal both make use of columns within the tariff structure for an hour+ rate (2+, 3+, 4+ and 5+). The use of the hour+ tariff is effectively an all-day tariff and it would be simpler for it to be set out as such. This would enable the columns for the 2+, 3+, 4+ and 5+ tariffs to be combined into a single 'all-day' column. It is recommended that this change is adopted.

Proposed Waveney tariff structure changes

2.34 The current Waveney tariff structure is overly complex and needs to be simplified. There are 16 existing tariffs which are essentially the same as others but have different tariff identification numbers (15, 17 & 19; 16 & 22; 1W, 7 & 21W; 10 & 20; 3 & 23; 1S, 2, 12W & 21S) These can be consolidated without changing the existing cost and/or terms for parking. It is recommended that the 16 existing tariffs are consolidated into 6 new tariffs the effect of which will not change the current terms of parking.

Tariff band headings

2.35 The Coastal tariff structure references car park tariffs according to seafront or non-seafront. This may be logical for locations like Felixstowe but is distinctly odd when seen on signs in inland car parks. The Waveney tariffs do not make this distinction.

2.36 A single new tariff structure could be made clearer if the tariffs were set out under headings and within these headings the tariffs were numbered accordingly. It is proposed to introduce four tariff band headings; free, low, medium and high and to group and renumber the existing tariffs under these headings. This will make the tariff structure easier to understand.

Excess charge notice (ECN) charge

2.37 The ECN charge is the penalty that is liable for the motorist who parks in contravention of the traffic regulation order. Excess charge notices (ECN), fixed penalty notices (FPN) and penalty charge notices (PCN) all provide the motorist with an incentive to settle the matter early by offering a 50% discount on the full amount provided it is paid within 14 days. The discount period in the Coastal TRO is stated incorrectly as 7 days although the website and back office processes apply the correct 14 day discount period. It is proposed that this anomaly is corrected in the tariff structure and new TRO.

2.38 Under criminal parking enforcement, local authorities are able to set their own level of ECN charge. Both districts have opted for different charging levels for larger/heavier vehicles and those for smaller /lighter vehicles TROs show a difference in ECN level between In the Coastal TRO the ECN discounted amount is £10 less than in the Waveney TRO (£40 compared with £50). The discounted period in the Coastal Order is stated to be only for 7 days compared to Waveney where the usual 14 day period is applied. The full ECN price is the same at £80. It is recommended that the ECN discount amount is harmonised at £50 for a 14 day discount rising to £80 at the end of the discount period.

2.39 The annotated changes to the Coastal and Waveney tariffs and the combined proposed combined East Suffolk tariff structure is set out in Appendix B.