

2018

Babergh and Mid Suffolk Area Parking Plan

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Executive summary

Requests to do something about parking in Suffolk has increased year on year. Changing priorities for the police coupled with fewer available resources to enforce parking, waiting and loading restrictions adds to the current problem in our congested towns and villages.

The Government believes that the enforcement of waiting, loading and parking restrictions should be a civil matter carried out by the local highway/traffic authority which is known as civil parking enforcement (CPE). The Secretary of State for Transport has reserved the power to require a local highway/traffic authority to apply for CPE. Most councils in England already operate CPE leaving about twenty at the time of writing who have not done so. Out of these, six are in Suffolk (Ipswich have operated CPE since 2005).

The Suffolk Public Sector Leaders, police and county, district and borough councils have agreed that the adoption of 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 (DfT) for these powers. The application was submitted to the DfT on the 25th April 2018 with the hope that giving the DfT double the usual six-month processing time would ensure the Statutory Instrument granting CPE powers would be approved to allow enforcement from April 2019. The DfT have informed the Suffolk Councils that due to Brexit there is insufficient parliamentary time to process our application for a 2019 commencement date and they have so far been unable to provide any timeframe when they will be able to do so.

Getting agreement to operate CPE 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. Babergh and Mid Suffolk took the decision at a very early stage that directly operating CPE would not be practical or cost effective due to our predominantly rural nature. It is planned that the neighbouring enforcement districts will carry out enforcement in our area which delivers an economy of scale. Even though we will not be carrying out enforcement ourselves we will still 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 and it is due to be formally adopted By the County Council's Cabinet on the 6th November 2018.

<https://committeeminutes.suffolk.gov.uk/Committee.aspx?Refinablestring10=The%20Cabinet>

The Babergh and Mid Suffolk Area Parking Plan provides greater detail on how the Suffolk Parking Management Strategy will be implemented locally and reflects our vision for parking in both districts. The Area Parking Plan does not set out specific proposals for parking restrictions for specific areas, nor is it a blue-print to introduce paid parking. What it does do is provide a toolkit on how we would go about investigating requests or reviewing the need for waiting, loading and parking controls when and if they occur. It also sets out how we plan to engage with the local community and seek the views of local councils, businesses and residents.

Area Parking Plan policies

Policy 1 – Babergh Mid Suffolk ‘Vision for Parking’

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

Policy 2 – off-street parking places

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

Policy 3 – the review of off-street car park operation

- The car park orders, tariffs, terms and conditions of use will be reviewed and where appropriate simplified and harmonised as part of the CPE implementation process. Planned changes will be advertised in accordance with national regulations.
- Car park tariffs and operational arrangements will be regularly reviewed on a biannual basis in accordance with the traffic order procedure regulations and Parking Places Variation of Charges Act 2017.

Policy 4 – parking petitions

- Part 4 and 5 of the Councils petition scheme will be amended with respect to parking petitions.
- A parking petition review can take 12 months before the report is finalised and considered by Members.
- Parking petitions will not be considered: -
 - ✓ within 3 years of the adoption of the Area Parking Plan;
 - ✓ less than 1 year after the adoption of a new traffic regulation order; and
 - ✓ less than 6 months after the implementation of an on-street parking scheme

Policy 5 – Highway Code test for safety schemes

- Babergh Mid Suffolk advocate the adoption of the Highway Code Test and request the County Council to adopt the process.

Policy 6 – parking consultation

Parking scheme development will use local engagement with Opinion Survey, Detailed Design consultation and Statutory Consultation as the standard procedure.

Policy 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 will only be considered where there is compelling evidence of need.

Policy 8

We will lobby the County Council to mark new advisory Blue Badge bay carriageway markings which will comply with TSRGD diagram 1028.3.

Policy 9

Footway parking is not to be encouraged. Allowing footway parking will only be considered where local consultation supports it and only if the footway construction and underground services are unlikely to be compromised and only with agreement from local councillors. Where allowed, appropriate signing in accordance to the TSRGD will be installed.

Policy 10

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

- Minimise the number 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;

Policy 11

Where school 'keep clear' markings are appropriate, they will be marked on the school gate side of the road. If it is desirable to have both sides of the road kept clear, the option of installing double yellow lines on the opposite side of the road will be considered.

About Babergh and Mid Suffolk

- Both districts are predominantly rural where most the population live in villages or small market towns. The two districts have been working in partnership for several years and now share a single headquarters based in the county-town of Ipswich.
- Babergh is the southern-most district in Suffolk and shares a common boundary with Essex along much of the River Stour. The River Orwell is the other important river in the district. It has a population of just over 90,000¹ and will be the smallest non-urban district in Suffolk (after the formation of East Suffolk and West Suffolk councils in April 2019) both in its geographical area and percentage of overall Suffolk population. Babergh is also ‘Constable Country’ attracting visitors from around the globe to the Dedham Vale conservation area and the well-preserved villages of Lavenham, Long Melford and Kersey. Sudbury and Hadleigh are the largest settlements in the district.
- Mid Suffolk is currently the largest and most rural of the Suffolk districts with a population of around 101,000. After April 2019, it will become the second smallest rural district in Suffolk. The market town of Stowmarket is the largest area of population although most habitation is based in village settlements. Mid Suffolk has the lowest population density in Suffolk but also the highest car ownership rate of anywhere in Suffolk. Its car ownership is ranked 11th in local authority areas in England and Wales².

Administrative district (post April 2019)	UK administrative district ranking by		Km ²	Miles ²	area % of county	Population			
	area	population				total	% of county	Density per	
								Miles ²	Km ²
Suffolk CC			3,801	1,468		752,200		512	198
East Suffolk	17	70	1,262	487	33%	245,000	32.6%	503	194
West Suffolk	27	105	1,035	400	27%	177,700	23.6%	444	172
Ipswich BC	292	157	40	15	1%	138,500	18.4%	9233	3463
Mid Suffolk	40	230	871	336	23%	100,700	13.3%	300	116
Babergh	72	270	594	229	16%	90,300	12.0%	394	152
					100%		100.0%		

¹ Suffolk Observatory 2017 figures

² RAC Foundation December 2012

Setting the context

The need for an area parking plan

4. 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'.³ In Babergh and Mid Suffolk in the past these policies have largely focused on the supply and operation of the Council's off-street car park portfolio.
5. 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 applied to the DfT for CPE powers to be granted to cover the remaining borough and district areas in March 2018 with an anticipated implementation date of April 2019. The DfT have responded that lack of parliamentary time due to Brexit will not allow them to meet the request and at the time of writing this plan no date has been provided when the DfT will grant CPE powers to Suffolk.
6. The intention in Suffolk is that enforcement will be carried out by the districts/boroughs under agency agreements with the County Council. Babergh and Mid Suffolk Councils took the decision not to directly enforce restrictions in our area. The predominantly rural makeup of the districts would make it inefficient and costly to do so ourselves. Instead enforcement will be carried out by adjacent district/boroughs where the economies of scale makes this the most appropriate and cost effective method of enforcement.
7. 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, overarching 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 Babergh/Mid Suffolk Area Parking Plan.

National policy

8. 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.
9. The Traffic Management Act 2004 imposes an explicit duty on local highway authorities to manage their network 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.⁴

³ DfT – Operational Guidance to Local Authorities: Parking Policy and Enforcement (March 2015) para 2.10 pp9

⁴ Operational Guidance para 2.1 pp8

10. 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 goals⁵: –

- 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.

Local policy

11. 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: – link to the county page when posted

12. 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/>

13. Babergh and Mid Suffolk work in partnership and the Joint Strategic Plan (2016-2020) provides an overview and scopes the pace, direction and purpose for both districts based on three key priority areas: -

- Economy and environment
- Housing
- Strong and healthy communities

The document can be viewed at: –

https://www.babergh.gov.uk/home/SearchForm?Search=joint+strategic+plan&action_results=G0

14. The Councils have also published its Open for Business Strategy which includes amongst its aims and objectives the delivery of 10,000 new jobs in the area along with 18,000 new homes by 2036. The documents can be viewed at: –

<https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>

15. The Open for Business Strategy and New Anglia Economic Strategy highlight opportunities with several large strategic sites including designated Enterprise Zones with the potential for significant job creation. Despite these strengths/opportunities, there are the substantial challenges of: –

⁵ Department for Transport- Guidance on Local Transport Plans (July 2009) chapter 3 pp12

- Limited commercial premises options for business;
- Slow broadband speeds;
- Skills gap which suppresses incomes and deters local and inward investment;
- High levels of outward commuting;
- Low levels of entrepreneurship;
- Market towns in need of support to become destination areas; and,
- Rural infrastructure are barriers to growth particularly road and digital networks.

Car ownership

16. 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.

17. At the Suffolk district/borough level, car ownership varies. Car ownership in Mid Suffolk in 2012 was ranked 11th out of all local authorities in England and Wales and Babergh 28th. This reflects its predominantly rural makeup and the lack of viable public transport alternatives in the area. Within the area there are marked differences between the districts. Households with no cars are significantly lower in both districts (Babergh 14.1% and Mid Suffolk 11.3%) than for Suffolk (17.9%), the East of England (18.5%) and England (25.8%).

18. Households in Babergh with 1 car are higher (40.6%) than Mid Suffolk (39%) but both are lower than for the East of England (42.9%) and Suffolk (43.5%). Households in both districts with 2 cars, 3 cars or 4 or more vehicles are all significantly higher than the Suffolk or East of England average which is a reflection on the rural makeup and poor public transport alternatives. The table below shows car ownership figures based on information from the 2011 Census⁶.

Car ownership	England		East of England		Suffolk		Babergh		Mid Suffolk	
	%	%	%	No.	%	No.	%	No.		
Households				338,720		40,210		43,610		
no car	25.8	18.5	17.9	60,631	14.1	5,670	11.3	4,928		
1 car	42.2	42.9	43.5	147,343	40.6	16,325	39.0	17,008		
2 car	24.7	29.1	29.2	197,812	33.2	26,699	35.9	31,312		
3 car	5.5	6.9	6.8	69,099	8.5	10,254	9.7	12,691		
4 or more	1.9	2.6	2.6	35,227	3.6	5,790	4.1	7,152		
Resident vehicles on the road (min)				449,481		59,068		68,162		

⁶ Source: - Suffolk Observatory

19. The continuing rise in vehicle ownership means 2018 car ownership will be higher than the figures shown in the table. Taken together and with the influx of visitors to the two districts there will be an increasing pressure on the existing road network. This in turn will lead to an increase in congestion and journey times and in areas where on-street parking contributes to a reduction in traffic flow, is likely to result in calls for the loss of some existing on-street parking in the worst congested areas in favour of waiting restrictions.
20. 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 the authorities in Suffolk have asked the DfT to grant CPE powers. The DfT have advised that due to the added workload due to Brexit it is unable to progress the Suffolk application for our choice of an April 2019 implementation date and so far, they have been unable to provide any indication of when Suffolk is likely to be granted these powers.

The case for managing parking

21. 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 districts. One of the outcomes of this underinvestment is a greater reliance on the car as the only viable means of transport.
22. 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.

Babergh and Mid Suffolk vision for parking

Policy 1 – Babergh and Mid Suffolk 'Vision for Parking'

- The Vision for Parking is "to allow parking where possible and control parking where necessary".

Civil parking enforcement

23. Under CPE, traffic authorities have control over parking and traffic policy and enforcement. In Suffolk, only the County Council (as highway/traffic authority) can apply for CPE powers. The County Council were granted CPE powers for the Ipswich borough area in 2005 and enforcement has been successfully undertaken by Ipswich Borough Council under an agency agreement with the County Council.

24. The Suffolk Public Sector Leaders and local authorities have agreed that CPE should be adopted for the whole of Suffolk and an application has been made to the Department for Transport to grant these powers. It is proposed that the enforcement of CPE powers will be devolved from the County Council to the district/boroughs under agency agreements, initially lasting for 10 years. 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.
25. 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 can challenge its validity without charge and includes access to an independent parking adjudicator whose decision is legally binding on both parties.
26. 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 Road Traffic Regulation Act 1984 (RTRA).
27. In Babergh and Mid Suffolk the Councils have taken the decision not to directly enforce restrictions ourselves. The logistical and economic model produced by the County Council's consultants predicted an operational financial deficit if we were to undertake enforcement ourselves whereas this could be mitigated by the greater economies of scale if our neighbouring districts did so on our behalf. The plan is for enforcement in Babergh and Mid Suffolk to be carried out jointly by Ipswich and West Suffolk Councils and financially underwritten by the County Council.

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"⁷. 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.⁸
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 Babergh and Mid Suffolk).

⁷ S.12 RTRA

¹⁰ S.32 RTRA

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.
37. **The Local Government Transparency Code 2015** sets out information local authorities are required to publish including the requirement to publish an annual parking account and the number of marked out parking spaces both on- and off-street.
38. **The Right to Challenge Parking Policies 2015** is the statutory instrument requiring local authorities to adopt specific policies for the acceptance and management of parking petitions over and above the local authority's general petition policy.
39. **Parking Paces Variation of Charges Act 2017** is amending legislation that requires local authorities to carry out consultation on any proposed changes to parking tariffs.

Current parking stock in Babergh and Mid Suffolk

40. Within the context of the Babergh Mid 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

41. In Babergh, the council provide or manage 24 car and lorry parks of which only the Pin Mill car park, one car park in Hadleigh and two car parks in Sudbury have any charges; the majority make no charge.

42. In Mid Suffolk, the council provide or manage 14 car and lorry parks of which only the Stowmarket car parks have charges the other 7 car and lorry parks have no charges.

43. The Babergh Mid Suffolk policy objective for off-street parking is: –

Policy 2 – off-street parking places

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

44. Car park tariffs are only applied in a limited number of the districts' car parks with most parking provided at no cost. In areas where there is a parking charge, the typical charge is: -

- Babergh Up to 3 hours free. £1.50 after 3 hours.
- Mid Suffolk Up to 1.5 hours £1.
 1.5 to 3 hours £2

45. Local authorities regularly review their parking charges to ensure they are fit for purpose in delivering their local policy objectives. The review process will typically consider the use, capacity and turnover of parking spaces within the car park and if charges or the level of charge is a factor in determining parking activity. Location, convenience and demand are all factors and are all specific to the car park. Any review will be on the merits of each location. The review will also consider operational costs such as the cost of providing the car park, its maintenance and the management and enforcement costs. For completeness, a review should also take account of charges in neighbouring authorities and in private commercial car parks.

46. The last car park charging review was carried out for the Babergh in 2011 and for Mid Suffolk in 2014. The DfT no longer stipulate that local authorities must operate their parking accounts so they are at least self-financing but they do advocate that this is good practice. The adoption of CPE will necessitate changes to the existing off-street traffic orders and provides an opportunity for a review of tariffs, terms of use and other operational arrangements on a car park by car park basis.

Policy 3 – the review of off-street car park operation

- The car park orders, tariffs, terms and conditions of use will be reviewed as part of the CPE implementation process. Planned changes will be advertised in accordance with national regulations.
- Car park tariffs and operational arrangements will be regularly reviewed on a biannual basis in accordance with the traffic order procedure regulations and Parking Places Variation of Charges Act 2017.

Comparison of costs for off-street parking in East Anglia

47. Benchmarking⁹ charges in East Anglia this year show that the Babergh and Mid Suffolk car park charges are at the bottom of charges. The results below focus on one hour charges and are correct at 2018: -

➤ Babergh	mostly free (Pin Mill 30p/hour)
➤ Mid Suffolk	mostly free (£1/1.5 hours in Stowmarket)
➤ Bury St. Edmunds	£1.00 - £3.50/hour
➤ Cambridge	£1.20 -£2.10/hour
➤ Chelmsford	£1.20 - £1.40/hour
➤ Colchester	£1.80 - £2.10/hour
➤ Ely	free or £3/day
➤ Great Yarmouth	£1.00 - £2.00/hour
➤ Ipswich	70p - £1.80/hour
➤ Kings Lynn	£1.60/hour
➤ Norwich	£1.40 - £2.00/hour
➤ Suffolk Coastal	40p - £1.40/hour.
➤ Waveney	70p - £1.20/hour.

Current on-street parking stock

48. In Babergh Mid 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 considerable number of years without change or review.
49. 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 2018/9, any discrepancies will be resolved and new traffic regulation orders will be advertised reflecting the restrictions as they appear on the highway.

⁹ Source: local authority parking websites and correct at 2018

50. The implementation of CPE should bring greater consistency and level of enforcement on the highway network. A possible consequence may be that the current restrictions are no longer considered 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

51. Benchmarking¹⁰ with other districts in East Anglia show that Babergh Mid Suffolk is in the minority for not charging for parking space in car parks or on the highway. While there are no current plans to change this arrangement, it will need to be kept under review. The results below focus on one hour charges for on-street parking in East Anglia and are correct at 2018: -

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

➤ Babergh	free/limited waiting
➤ Mid Suffolk	free/limited waiting
➤ Suffolk Coastal	free/limited waiting
➤ Waveney	free/limited waiting
➤ Ipswich	£1.50 - £2.00/hour
➤ Bury St. Edmunds	£2.20/hour
➤ 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

52. There are currently no resident permit parking schemes in Babergh Mid Suffolk and no plans at the time of writing for any introduction of on-street permit schemes. Some car parks do operate a permit holder scheme. Where these occur, the charges are £25/month, £70/quarter and an annual permit is £250.

On-street resident permit price (correct at 2018)

➤ Babergh	N/A
➤ Mid Suffolk	N/A
➤ Suffolk Coastal	N/A
➤ Waveney	£22
➤ Ipswich	£100/year
➤ Bury St. Edmunds	£29 - £76/year (prices vary by parking zone)
➤ Great Yarmouth	£40/year
➤ Norwich	£21.60 – 49.80/year (prices vary on vehicle size)
➤ Kings Lynn	£40/year
➤ Colchester	£62/year

¹⁰ Source: local authority parking websites and correct at 2018

- Chelmsford £26/year
- Cambridgeshire £50 - £81/year (prices vary by parking zone)
- Ely N/A

Parking petitions

53. The Department for Communities and Local Government (DCLG – now Ministry of Housing, Communities and Local Government) has produced statutory guidance in 2015 to local authorities under section 18 of the Traffic Management Act 2004 requiring them to set policies for petitions challenging parking policies. The statutory guidance recognises that local authorities should already have policies for petitioning about council run services but requires specific and additional policies and procedures to be published with respect to parking policies. The Councils general petitions policy can be seen here: - <https://babermidsuffolk.moderngov.co.uk/documents/s11533/Petition%20Scheme.pdf>
54. The DCLG have provided guidance and best practice advice on what policies should be adopted and provided illustrative examples for a rural district and/or county council that covers: -
- a) The minimum number of signatures for a valid petition;
 - b) Information that needs to be provided by and about the petitioners;
 - c) How the petition will be managed on receipt;
 - d) The timeframe for a review;
 - e) The circumstances when a petition will not be considered;
 - f) Definition of vexatious petitions.
55. The Babergh and Mid Suffolk petitions scheme has set a minimum number of 20 signatures for a valid petition and this will be the general requirement for parking petitions. The DCLG guidance does require the use of discretion rather than imposing a minimum threshold as an immovable hurdle. “Some parking issues may most directly affect a particularly small number of people – such as residents on a street. In these cases, local authorities should take this into account when considering the appropriate thresholds for specific petitions.” The guidance suggests an achievable threshold would be around 10% - 20% and it is our intention to apply this in appropriate circumstances.
56. The petitions scheme sets out the information that needs to be provided by and about the petitioners and provides a definition of vexatious petitions and these do not need to be amended. As the provisions for handling parking petitions come under statutory guidance we would handle a parking petition under the statutory petitions process.
57. Part 4 and part 5 of the petitions scheme would not apply to a parking petition and instead the following proposed approach would apply: -

How a parking petition will be managed

58. A valid parking policy petition will be managed in the following way. An acknowledgement will be sent to the petition organiser within 10 working days of receiving and confirming that it is a petition. In most cases this will involve: -
- undertaking a review;

- possibly public consultation;
- analysis of results;
- drafting a report on the outcome of the review;
- reporting to Cabinet;
- The petitioner will be specifically notified of when the report will be considered by Cabinet to enable them to attend the meeting.

The timeframe for a review

59. The timeframe for a review and reporting to Cabinet is recommended to be set at 12 months from the date of acknowledgement of the petition.

When a parking petition is inappropriate

60. The circumstances when a parking petition will be inappropriate are generally linked to where public consultation has already taken place in the formulation of a policy, traffic regulation order or prior to the introduction of a parking scheme. In these circumstances the public have had an opportunity to influence the decision prior to it being adopted. It would not be a good use of council resources to carry out further reviews until a reasonable time has lapsed from the adoption or implementation of a scheme. The proposed time restraint on accepting petitions on parking polices are set at: -

- 3 years following the adoption or review of policies within the Babergh Mid Suffolk Area Parking Plan;
- 1 year following the adoption of new traffic regulation orders;
- 6 months after the implementation of an on-street parking scheme.

61. In setting a time limit where a petition would not be considered the Council will not use this as an immovable hurdle if local circumstances have changed and will use its discretion to ascertain if there is merit in accepting a petition and commencing a review of the issues raised in the petition.

Policy 4 – parking petitions

- Part 4 and 5 of the Councils petition scheme will be amended with respect to parking petitions.
- A parking petition review can take 12 months before the report is finalised and considered by Members.
- Parking petitions will not be considered: -
 - ✓ within 3 years of the adoption of the Area Parking Plan;
 - ✓ less than 1 year after the adoption of a new traffic regulation order; and
 - ✓ less than 6 months after the implementation of an on-street parking scheme

Requests for new restrictions or amendments to existing waiting restrictions

62. Once CPE is adopted for the whole of Suffolk, it will generally be the responsibility of the enforcement districts under agency agreements with the County Council to manage and deliver enforcement. In Babergh and Mid Suffolk the management and delivery of enforcement will be

carried out jointly by Ipswich and West Suffolk Councils. Requests for new on-street restrictions or amendments to existing ones will be the responsibility of Babergh and Mid Suffolk or the County Council.

63. 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 petitions 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.
64. 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. In Babergh and Mid Suffolk this will be a collaborative approach between ourselves and the County Council and involving the enforcement districts working in our area. We 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.
65. The most common types of parking issue can be broken down into four categories: –
- 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. ‘Commuter’ parking on local roads: –
 - ✓ Clogging up local streets;
 - ✓ Restricting residential parking.
 - d. 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.
66. The first three categories potentially involve the introduction of yellow line waiting restrictions and the consideration of such measures will remain the responsibility of the County Council. The County Council is proposing to devolve decisions over on-street paid parking priority schemes to the districts. This could mean that only the last category would be the responsibility of Babergh Mid Suffolk, *if* we were prepared to introduce charging. We understand that the County Council will not be giving devolved powers to the enforcement districts to introduce parking priority schemes that are free to the user. Taking things one step at a time, we need to assess: -
- 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?

67. 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 several days and months, 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

68. These make up 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. These will remain the responsibility of the County Council.

Priority 2 – Accessibility

69. Issues that affect the flow of traffic where parking contributes to problems or increases congestion on the highway network. This is not generally 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 account the potential that reducing on-street parking may have for increasing speed on the highway. These issues will remain the responsibility of the County Council.

Priority 3 - Capacity

70. 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

71. Parked vehicles, traffic signs and road markings can have a detrimental effect on the visual or environmental amenity of a town, village or neighbourhood. This includes parking on footways and/or grass verges or where parking is a visual intrusion rather than a safety or accessibility issue.

Priority 5 - Monitor

72. Some parking and/or safety issues randomly occur but they are not sufficiently or consistently serious to justify action straight away. Continue monitoring the situation to establish if the problem worsens over time.

Localised highway safety schemes

73. 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

74. Highway safety should always be a priority for the County Council. Where inappropriate, persistent or dangerous parking is detrimental to road safety and funding is available to do something about it we would wish the County Council to adopt a ‘Highway Code Test’ based on Rule 242 and Rule 243.
75. 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.
76. It is envisaged that Highway Code Test proposals would be batched together (e.g. a series of junction protection measures in an 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 Babergh Mid Suffolk Council agree, we advocate that the County Council should dispense with informal consultation stages and proceed directly to the Statutory Consultation stage when the traffic orders are formally advertised.

Policy 5 – Highway Code test for safety schemes

- Babergh Mid Suffolk advocate the adoption of the Highway Code Test and request the County Council to adopt the process.

Local engagement

77. 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.
78. In certain situations, it may be possible to combine the detailed design and statutory consultation stage into a single operation. Further detail on the consultation process is contained in Appendix A.

Opinion survey

79. 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.
80. 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

81. 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. We will only be allowed to develop paid on-street parking schemes. This means the County Council will consider where appropriate the design/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)
 - yellow line waiting and/or loading restrictions.

82. 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.
83. 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 either at County or district level depending on the proposal. 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

84. 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.
85. Any objections must be made in writing and must 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 must be communicated to the objector within 14 days of the date for making of the traffic order.

Policy 6 – parking consultation

Parking scheme development will use local engagement with Opinion Survey, Detailed Design consultation and Statutory Consultation as the standard procedure.

Managing expectations in the current economic climate

Delivering the solution

86. The adoption of CPE for the whole of Suffolk will for the first time make all 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.
87. Dealing with multiple requests from an 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

88. 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 and we will be lobbying the County Council to adopt this approach.

Tackling parking congestion

89. 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.
90. 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 does not represent value for money.
91. 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 but will be a matter for the County Council to review and implement.
92. 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.
93. Schemes are unlikely to 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.
94. 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

95. 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 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.
96. 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.

Access protection

97. 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 County Council and pay for these markings to be installed. Further information can be found on the County Councils website here: -

<https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-access-protection-markings/>

Controlled parking zones

98. Probably the most common form of parking restriction after yellow lines 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 any 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.
99. 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.
100. Extensive operational hours may initially seem attractive to some 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 with these times 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 in retail areas or different operational hours in predominantly residential areas.
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. Several enforcement authorities have

adopted shorter operational hours, for example CPZs of 9:30am-4:30pm and have reported that they work well and are generally popular with residents. These hours still provide control and a turnover of spaces during peak times but are more relaxed at the start and end of day. 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 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 will only be considered where there is compelling evidence of need.

Disabled parking bays

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 locations, 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 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. The County Council are responsible for the issue and administration of the Blue Badge scheme. Bays will generally not be installed: -
- where 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).

106. 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 relative speed of installation. The disadvantage with the road marking currently used is that once a vehicle is parked in the bay it is difficult to see that it is an advisory disabled bay for other motorists or CEOs. While the bay is not enforceable, we would wish to be able to issue warning notices to vehicles parked without a Blue badge on display. To enable this to happen it is necessary that the bay is marked in accordance with the TSRGD.

Policy 8

We will lobby the County Council to mark new advisory Blue Badge bay carriageway markings which will comply with TSRGD diagram 1028.3.

Footway and verge parking

107. 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 consider is the problem it causes for pedestrians and wheelchair users trying to walk on the footway or the potential damage to the footway or grass verge and assets under the footway.
108. Under current legislation, acting 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.
109. 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.
110. Footway and verge parking is not desirable and not to be encouraged. There are certain locations where vehicles have traditionally parked, partly or fully on the footway 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. Where it is considered appropriate to allow this to continue and in anticipation of changes to the legislation, certain tests will 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 – the unobstructed footway width would be around 1,200mm (4 foot).

111. 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, either traffic signs complying with TSRGD diagram 667 or 668 will be placed to indicate the extents where footway parking is allowed or appropriate marks on the footway/carriageway will be used. Verge parking will not be allowed.

Policy 9

Footway parking is not to be encouraged. Allowing footway parking will only be considered where local consultation supports it and only if the footway construction and underground services are unlikely to be compromised and only with agreement from local councillors. Where allowed, appropriate signing in accordance to the TSRGD will be installed.

Reducing street clutter

112. 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, 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 holistically with the aim 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.

113. 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 Babergh and Mid 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 10

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

- Minimise the number 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;

Managing parking around schools

114. Child casualties around schools are thankfully very rare in Babergh and Mid Suffolk but like all schools across the country managing behaviours around the 'school-run' period, particularly the afternoon pick-up timeframe can be a 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;
- Zigzags should only be marked in front of pedestrian entrances;
- If both sides of the carriageway need to be kept clear, double yellow lines should be used on the opposite side of the carriageway;
- 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.

115. These restrictions are better than nothing and are generally respected. Enforcement is an issue and the reality is there will not be enough civil enforcement officers (CEOs) to enforce all the schools at any one time. This means that a CEO cannot be expected to be at the school every day.

Policy 11

Where school 'keep clear' markings are appropriate, they will be marked on the school gate side of the road. If it is desirable to have both sides of the road kept clear, the option of installing double yellow lines on the opposite side of the road will be considered.

Appendix A

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.

The 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 overall response rate, the level of support and whether the streets where there is a straightforward majority support for controls would form a coherent zone area. Working in conjunction with the County Council, we will 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 initially consult over a wider

area than that in which there are known to be current parking difficulties to try and establish the 'core' area where parking is an issue.

Reporting on the consultation results

The results of parking consultations will be reported to the appropriate County and District 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)

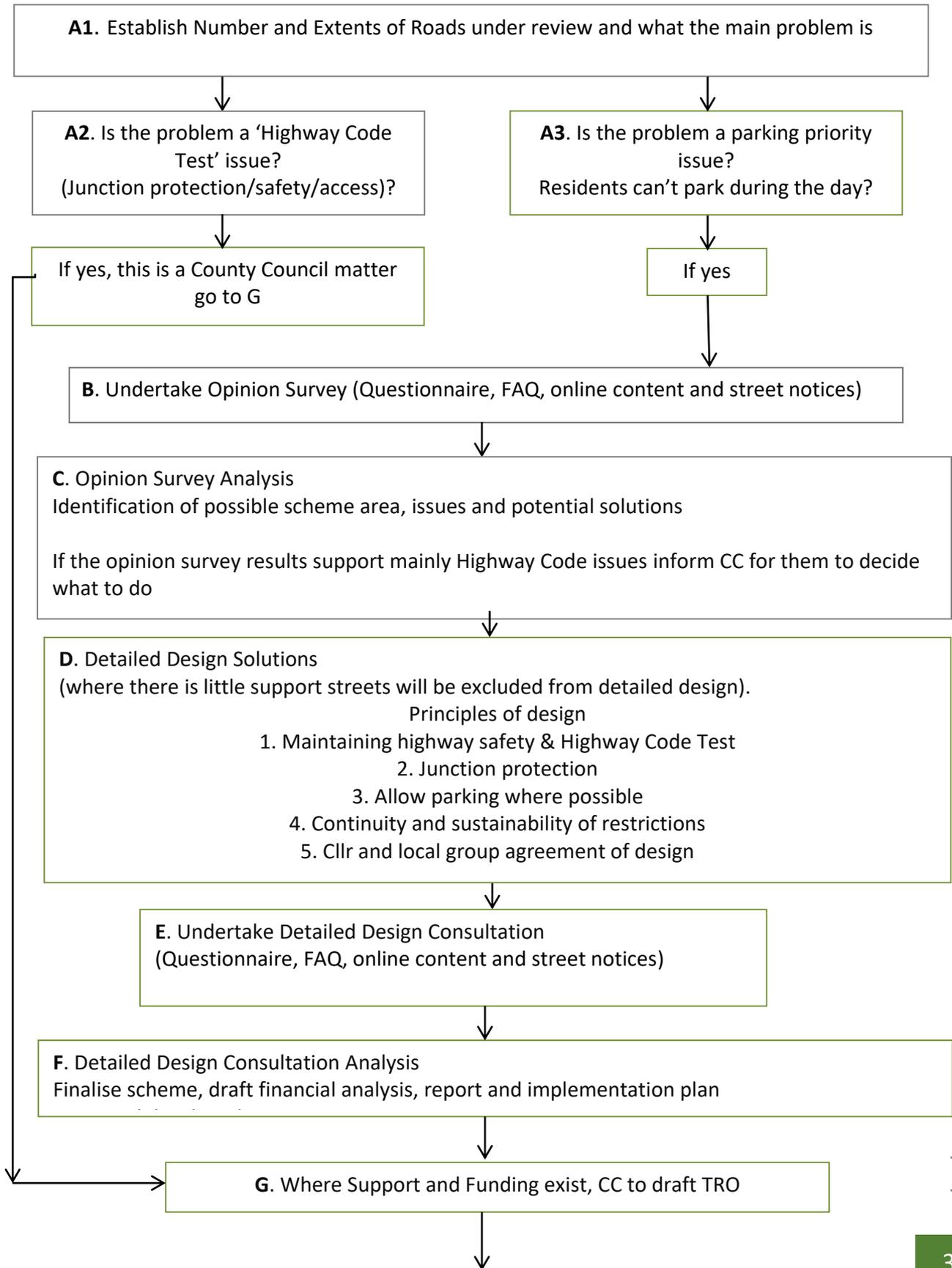
We have produced a design aimed at improving the ability to find a parking space in your area

- 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

Appendix D

Parking Scheme Workflow Process



12/31/2018

