Appendix A 2019

Babergh and Mid Suffolk Joint Area Parking Plan

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# **Document revision**

Revision date	author	Revision description	Section/paragraph
27 October 18	AJT	Master document formatted	All
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# **Executive summary**

Requests to do something about parking in Suffolk have increased year on year along with the increase in vehicle ownership and use. While the numbers of vehicles increased, the amount of time they are being actively used is estimated at around 3-4%. For 80% of the time the vehicle is parked at home and around 16% of the time it is spent parked at a destination<sup>1</sup>.

There is a significant amount of anecdotal evidence and opinion over the relationship between good car parking provision and town and village centre prosperity and vibrancy. Local authorities must take account of conflicting demands for parking space for residents, visitors, business and workers. It also must balance this with the affects that unrestricted and free parking can contribute to increased congestion, obstructions, pollution and spaces being occupied by the wrong users at inappropriate times.

Accommodating all car users, particularly in historic towns and villages, is not always possible and will remain a challenge for local authorities. Changing priorities for the police coupled with fewer available resources to enforce on-street 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). 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. The councils and police have been working together to put together the business case in support of an application to the Department for Transport (DfT) for these powers. The application was submitted to the DfT in April 2018. The DfT have informed the Suffolk Councils that due to Brexit there is insufficient parliamentary time to process an application for the requested April 2019 commencement date. At the time of writing, the DfT have been unable to provide any definite timeframe when they will be able to do so.

Suffolk County Council has provided the over-arching strategic approach to the operation of civil parking enforcement in the Suffolk Parking Management Strategy 2018 (SPMS) which was formally adopted By the County Council on the 6<sup>th</sup> November 2018. https://committeeminutes.suffolk.gov.uk/Committee.aspx?Refinablestring10=The%20Cabinet

Each district/borough will publish Area Parking Plans (APP) providing the detail on how the SPMS will be implemented locally. The Babergh and Mid Suffolk Joint Area Parking Plan (BMS APP) does so and reflects both Councils' vision for parking in both districts. The BMS APP does not set out specific proposals for parking restrictions for specific areas, nor is it a blueprint to introduce paid parking. What it does is to 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 the Councils plan to engage with the local community and seek the views of local councils, businesses and residents.

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<sup>&</sup>lt;sup>1</sup> Source RAC foundation 2012

# **Area Parking Plan policies**

### Policy 1 - Babergh and Mid Suffolk Councils' joint '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 utilised 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 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 at least on a biennial 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 to incorporate specific provisions for the handling of parking petitions.
- A parking petition review can take 12 months before the report is finalised and considered by Councillors.
- Parking petitions will not be considered:
  - o within 3 years of the adoption of the Area Parking Plan;
  - o less than1 year after the adoption of a new traffic regulation order; and
  - o less than 6 months after the implementation of an on-street parking scheme

### Policy 5 - parking consultation

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

#### Policy 6 – standard operational hours

- 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 7 – footway parking

Footway parking is not to be encouraged. Allowing footway parking will only be considered in exceptional circumstances and 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 Traffic Signs Regulations and General Directions 2016 (TRSGD) will be installed.

#### Policy 8 – reducing street clutter

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;

# **About Babergh and Mid Suffolk**

- 1. Both districts are predominantly rural where most of 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.
- 2. Babergh is the southernmost 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. Babergh has a population of just over 90,000² 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 'wool town' villages of Lavenham, Long Melford and Kersey. Sudbury and Hadleigh are the largest settlements in the district.
- 3. 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 in Suffolk. Its car ownership is ranked 11<sup>th</sup> in local authority areas in England and Wales<sup>3</sup>.

Administrative district (post April 2019)		UK administrative district ranking by		Miles <sup>2</sup>	area %	Population				
	area	population			county	total % of De		Densit	Density per	
							county	Miles <sup>2</sup>	Km <sup>2</sup>	
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%			

<sup>&</sup>lt;sup>2</sup> Suffolk Observatory 2017 figures

<sup>&</sup>lt;sup>3</sup> 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'.<sup>4</sup> It also requires local authorities to keep these policies up to date and to reflect wider strategic priorities, changes in development and land use and to accommodate changes in legislation and national guidance.
- 5. The decision to adopt civil parking enforcement (CPE) powers for the whole of Suffolk has provided an opportunity for the county, district and boroughs to review their current parking policies and approach to the implementation and management of CPE.
- 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 at a very early stage 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. Even though we will not be carrying out enforcement ourselves the Councils will still set out the guiding policies and objectives on how this will operate once civil parking enforcement is granted.
- 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 adopted the **Suffolk Parking Management Strategy 2018** which provides a high level, over-arching strategy for the whole county. Area Parking Plans (APP) will be produced for each enforcement district setting out the detailed policies to be adopted for the management of on- and off-street parking. East Suffolk approved its Area Parking Plan in November 2018 and the other district/boroughs are working on the production of their own policies. This document is the first Babergh and Mid Suffolk Joint Area Parking Plan.
- 8. An APP that deals with the supply and management of parking can be one of the most useful tools available to local authorities in helping them achieve their economic, social and environmental objectives. An APP can:-
  - Support the local economy (e.g. by making it easy for shoppers and tourists to visit Suffolk) and facilitate development growth;
  - Meet residents' needs for parking near their homes (e.g. by introducing controlled parking zones);
  - Provide access to key services and facilities for special needs groups and people with impaired mobility;
  - Improve journey time reliability for road users (e.g. by designing and managing onstreet parking facilities to reduce traffic conflicts and delays);

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

- Encourage sustainable travel modes and help reduce reliance on the private car (e.g. by setting parking charges at appropriate levels);
- Enhance the built and natural environment (e.g. by making the most effective use of land required for parking and by improving the look of the street scene by reducing sign clutter);
- Make Babergh and Mid Suffolk a safer place (e.g. by ensuring that car parks are 'safer by design' and improving road safety).

# **National policy**

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

## **Local policy**

- 12. **The Suffolk Local Transport Plan** has a small section on parking. This has been expanded by the 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.
- 13. The County Council has also produced the **Suffolk Guidance for Parking** which provides guidance for developers and planning authorities.

The document can be viewed at: — <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/">https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/</a>

<sup>&</sup>lt;sup>5</sup> Operational Guidance para 2.1 pp8

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

- 14. Babergh and Mid Suffolk Councils 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: — <a href="https://www.babergh.gov.uk/home/SearchForm?Search=joint+strategic+plan&action\_results=Go">https://www.babergh.gov.uk/home/SearchForm?Search=joint+strategic+plan&action\_results=Go</a>

15. The Councils have also published their 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 implementation of this strategy will result in an increase in vehicle numbers and put further pressure on the road network and parking provision.

The document can be viewed at: — <a href="https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf">https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf</a>

16. The Open for Business Strategy and New Anglia Economic Strategy highlight the importance of the districts' market towns as drivers of broader economic growth and as service delivery hubs for wider catchments. The future development and evolution of our town centres and high streets, including as visitor destinations, is clearly influenced by effective, flexible and progressive joint APP. The Councils' Vision for Prosperity project programmes and Visioning Action Plans for our Market Towns, focused by the underpinning community and stakeholder engagement work, have made that clear connection.

## Car ownership

- 17. The number of cars on Britain's roads and the number of households with regular access to one or more vehicles continues to rise, particularly in areas with poor/infrequent access to public transport. Multiple car ownership in the East of England is significantly higher than the rest of England and is influenced by the rural nature and relative lack of access to good public transport. The county of Suffolk broadly matches the East of England percentage figures for car ownership.
- 18. At the Suffolk district/borough level, car ownership varies. Car ownership in Mid Suffolk in 2012 was ranked 11<sup>th</sup> out of all local authorities in England and Wales and Babergh 28<sup>th</sup>. This reflects its predominantly rural makeup and the lack of viable public transport alternatives in the area. Within Suffolk 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%).
- 19. 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 Census<sup>7</sup>.

Car ownership	England	East of England		Suffolk	В	abergh	Mic	d Suffolk
Households				338,720		40,210		43,610
	%	%	%		%	No.	%	No.
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

- 20. 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.
- 21. Within this timeframe (2011-2018) a change in priorities for policing has resulted in less resources being available year on year for the active enforcement of highway restrictions in Suffolk. Increasing traffic levels and reduced enforcement results in more congestion and pressure on the road network and is the primary reason the authorities in Suffolk have asked the DfT to grant CPE powers.

### The case for managing parking

- 22. Managing parking is one of the most effective means of tackling congestion and its more serious consequences increased air pollution, delay, and unreliability of scheduled public transport services. Lack of investment in transport infrastructure has been consistently acknowledged as a barrier to growth in the county and at district level. One of the outcomes of this underinvestment is a greater reliance on the car.
- 23. For many residents and especially those living in rural communities the car is the only viable means of transport as there is often little or no 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.

1/1/2019

<sup>&</sup>lt;sup>7</sup> Source:- Suffolk Observatory

# Babergh and Mid Suffolk Councils' joint vision for parking

### Policy 1 – Babergh and Mid Suffolk Councils' joint 'Vision for Parking'

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

## **Civil Parking Enforcement**

- 24. Under CPE, traffic authorities have control over parking and traffic policy and enforcement. In Suffolk, only the County Council (as highway/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.
- 25. 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 the extension of 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 penalty charge notice (PCN) for vehicles found to be in contravention of the restrictions.
- 26. Enforcement is a civil rather than a criminal matter. Part 6 of the **Traffic Management Act 2004** (TMA) 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.
- 27. Income from the issue of PCNs is retained by the enforcement authority to contribute towards the cost of enforcement. Authorities who operate CPE generally do not make a surplus and many operate at a deficit. The use of any surplus income is regulated by section 55 of the **Road Traffic Regulation Act 1984** (RTRA).
- 28. In Babergh and Mid Suffolk, the Councils have taken the decision not to directly enforce restrictions. 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 Council and financially underwritten by the County Council.

# Legislative basis for civil parking enforcement

- 29. **The Road Traffic Regulation Act 1984** (as amended) (RTRA) makes it the duty of the local traffic authority (Suffolk County Council) to "secure the expeditious, convenient and safe movement of traffic and the provision of suitable and adequate parking facilities so far as this is practicable<sup>8</sup>". The Act empowers the traffic authority to control waiting and loading and to provide parking places on the highway. The Act gives powers for local authorities (usually district/borough councils) to provide off-street parking places.<sup>9</sup>
- 30. Part VIII of the RTRA deals with the enforcement of on-street 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).
- 31. 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.
- 32. **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.
- 33. The Civil Enforcement of Parking Contraventions (England) General Regulations 1997 extended the civil penalties regime outside of London.
- 34. **Part 6** of the **Traffic Management Act 2004** (TMA) (enacted March 2008) replaced the RTA for England and Wales and is the current legislation under which CPE is regulated.
- 35. The Secretary of State's Statutory Guidance to Local Authorities on Civil Enforcement of Parking Contraventions (November 2015) and;
- 36. 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.
- 37. **The Traffic Signs Regulations and General Directions 2016** (TSRGD) prescribes the traffic and parking signs to be used on the highway.
- 38. **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.

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

<sup>8</sup> S.12 RTRA

- 39. **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.
- 40. **Parking Places 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**

41. Within the context of the BMS APP, 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**

42. 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. Details of the car and lorry parks can be viewed at:

https://www.midsuffolk.gov.uk/communities/parking/babergh-car-and-lorry-parks/

43. 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. Details of the car and lorry parks can be viewed at:

https://www.midsuffolk.gov.uk/communities/parking/mid-suffolk-car-and-lorry-parks/

44. The Babergh and Mid Suffolk Councils' joint policy objective for off-street parking is: –

#### Policy 2 - off-street parking places

- Off-street parking places will be utilised to assist with traffic management and to support and promote our communities.
- 45. 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 charges are:-
  - Babergh Up to 3 hours free.

After 3 hours £2.00

Mid Suffolk Up to 2 hours £1.00

2.0 to 3 hours £2.00

46. 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, business rates, 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.

47. The last car park charging review was carried out for 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 the do advocate that this is good practice. The DfT does stipulate that "The Secretary of State will not expect either national or local taxpayers to meet any deficit". 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 at least on a biennial 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

48. Benchmarking<sup>11</sup> 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 (£1/2 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.

<sup>&</sup>lt;sup>10</sup> Operational Guidance to Local Authorities: Parking Policy and Enforcement (March 2015)

<sup>&</sup>lt;sup>11</sup> Source: local authority parking websites and correct at 2018

# **Current on-street parking stock**

- 49. In Babergh and 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.
- 50. 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.
- 51. 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

52. Benchmarking<sup>12</sup> with other districts in East Anglia show that the Councils are 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

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<sup>&</sup>lt;sup>12</sup> Source: local authority parking websites and correct at 2018

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

53. There are currently no on-street resident permit parking schemes operated by the Councils and no plans at the time of writing for any introduction of on-street permit schemes.

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/yearColchester £62/yearChelmsford £26/year

Cambridgeshire £50 - £81/year (prices vary by parking zone)

• Ely N/A

## **Parking petitions**

54. 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://baberghmidsuffolk.moderngov.co.uk/documents/s11533/Petition%20Scheme.pdf

- 55. The DCLG have provided guidance and best practice advice on what polices should be adopted and provided illustrative examples for a rural district and/or county council that covers:-
  - The minimum number of signatures for a valid petition;
  - Information that needs to be provided by and about the petitioners;
  - How the petition will be managed on receipt;
  - The timeframe for a review;
  - The circumstances when a petition will not be considered;
  - Definition of vexatious petitions.
- 56. The Councils' 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. <sup>13</sup> "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.

- 57. 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.
- 58. Part 4 and part 5 of the Councils' current petitions scheme would not apply to a parking petition and instead the following proposed approach would apply:-

## How a parking petition will be managed

- 59. 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

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

#### When a parking petition is inappropriate

- 61. 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 BMS APP;
  - 1 year following the adoption of new traffic regulation orders;
  - 6 months after the implementation of an on-street parking scheme.

-

<sup>&</sup>lt;sup>13</sup> Right to challenge parking policies – DCLG (March 2015) page 6

62. In setting a time limit where a petition would not be considered the Councils 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:
  - o within 3 years of the adoption of the Area Parking Plan;
  - less than1 year after the adoption of a new traffic regulation order; and
  - o less than 6 months after the implementation of an on-street parking scheme.

# Requests for new restrictions or amendments to existing waiting restrictions

- 63. 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 Councils or the County Council.
- 64. 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
- 65. 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.

- 66. The most common types of parking issue can be broken down into four categories:
  - Dangerous and inconsiderate parking:
    - Parking around junctions;
    - Parking on bends;
    - Blocking driveways and accesses;
    - Affecting free flow of traffic.
  - School parking:
    - Inconsiderate/dangerous parking during the school-run;
    - School access controls;
    - Student parking.
  - Commuter and tourism parking on local roads:
    - Clogging up local streets;
    - o Restricting residential parking.
  - 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.
- 67. 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. We will 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?
- 68. 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**

69. 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**

70. 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 has for increasing speed on the highway. These issues will remain the responsibility of the County Council.

## **Priority 3 - Capacity**

71. 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**

72. 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**

73. 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.

## **Local Engagement**

- 74. 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.
- 75. 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**

- 76. 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.
- 77. 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**

- 78. 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.
- 79. 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.
- 80. 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**

- 81. 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.
- 82. 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 5 - 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**

- 83. 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.
- 84. 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**

85. Problems with persistent dangerous parking under CPE remain the responsibility of the County Council. In the current economic climate, it is unlikely that an individual location would be progressed in isolation. Instead it is envisaged that the County Council would batch similar locations together to take advantage of economies of scale.

# **Tackling parking congestion**

86. 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.
- 87. 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.
- 88. 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.
- 89. 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.
- 90. 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.
- 91. 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**

- 92. 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 commuters parking all day and taking up kerb-side parking spaces to the detriment of residents. Commuter parking is often linked with single car occupancy and represents one of the least efficient modes of transport. 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.
- 93. 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.

# **Tourist parking**

- 94. Tourism is a key UK industry equivalent to 6.4% of GDP and worth an estimated £74billion. Once seasonal, tourism is now a year-round industry. It is estimated that in the UK around 1 billion tourist day trips take place and of these, 73% are by car. <sup>14</sup> Tourist parking differs from other forms of parking in that the motorist is:-
  - often unfamiliar with the local area;
  - more likely to depend on parking signage to destination;
  - greater expectation to pay to park but is sensitive to pricing;
  - expects reasonable levels of parking provision;
  - has the option to go elsewhere;
  - usually parks for medium or long stay.

## **Access protection**

95. 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**

- 96. 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.
- 97. 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.
- 98. 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

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<sup>&</sup>lt;sup>14</sup> Parking and Tourism – Position paper 13 British Parking Association (August 2006)

- 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.
- 99. 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.
- 100. 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
- 101. 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 6 – standardised operational hours

- 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

- 102. 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.
- 103. 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

- 104. 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).
- 105. 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.

## Footway and verge parking

- 106. Footway and verge parking is a national issue. Motorists often do so in the belief that they are assisting other motorists by keeping the carriageway free for passing vehicles. What motorists fail to 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.
- 107. 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.
- 108. The 2016 edition of the TSRGD allowed the option to create an area-wide footway/ verge parking ban which is signed in a similar fashion to a CPZ. This is a potentially attractive option to consider but before adopting this approach there will be a need to define some standardised protocols to be used in the consideration of future schemes.
- 109. Footway and verge parking is not desirable and not to be encouraged but except for heavy vehicles is not an offence (except in cases of obstruction). The Government has indicated its intention to carry out a review of the current arrangements which could result in the introduction of a nation-wide footway parking ban. In anticipation of changes to the legislation, 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.
- 110. Where it is considered appropriate to allow this to continue, 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 between parked vehicle and property boundary 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 7 – footway parking

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.
- 114. 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;
- Conservation signing and lining where appropriate.

#### Policy 8 - reducing street clutter

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;

## Managing parking around schools

- 115. It has been estimated that 46% of primary school pupils and 23% of secondary travel to school by car. <sup>15</sup> Child casualties around schools are thankfully very rare in Babergh and Mid Suffolk but like all schools across the country managing the increased traffic and stressed behaviours around the 'school-run' can be a challenge. Residents living close to a school where such behaviour is a regular occurrence understandably wish the problem to be resolved.
- 116. The County Council may propose introducing school keep clear zigzags across the pedestrian entrance to a school. These restrictions are aimed at reinforcing safe lines of sight for pedestrians and motorists. If pedestrians are likely to be crossing the road at the same point it is usual to include waiting restrictions on the opposite side of the road to balance the need for sight lines. School zigzags are generally well respected and do not need constant active enforcement by civil enforcement officers (CEOs) to keep the area clear of parked vehicles.

National Travel Su

<sup>&</sup>lt;sup>15</sup> DfT National Travel Survey 2014

# **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 voi	ır street do	vou have a	parking problem?	Yes /	/no	/don't know
⊥.	111 900	ii sticct ao	you nave a	parking problem:	103/	110	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**

A1. Establish Number and Extents of Roads under review and what the main problem is

**A2**. Is the problem a 'Highway Code Test' issue?

(Junction protection/safety/access)?

If yes, this is a County Council matter go to G

**A3**. Is the problem a parking priority issue?

Residents can't park during the day?

If yes

B. Undertake Opinion Survey (Questionnaire, FAQ, online content and street notices)

C. Opinion Survey Analysis

Identification of possible scheme area, issues and potential solutions

If the opinion survey results support mainly Highway Code issues inform CC for them to decide what to do

**D**. Detailed Design Solutions

(where there is little support streets will be excluded from detailed design).

Principles of design

- 1. Maintaining highway safety & Highway Code Test
  - 2. Junction protection
  - 3. Allow parking where possible
  - 4. Continuity and sustainability of restrictions
  - 5. Cllr and local group agreement of design

**E.** Undertake Detailed Design Consultation (Questionnaire, FAQ, online content and street notices)

**F.** Detailed Design Consultation Analysis Finalise scheme, draft financial analysis, report and implementation plan

**G**. Where Support and Funding exist, CC to draft TRO

H. Undertake Statutory Consultation

Draft TRO (advertised in press and street notices and plans on deposit, on the web site, library. Letters to frontages and statutory consultees

21/1/2010

