

Transport and Environment Committee

10.00am, Tuesday, 15 January 2013

Objections to Nine Hour Parking Places Traffic Regulation Order

Item number	8.2
Report number	
Wards	5 - Inverleith, 6 - Corstorphine/Murrayfield, 9 - Fountainbridge/Craiglockhart, 10 - Meadows/Morningside, 11 - City Centre and 12 - Leith Walk

Links

Coalition pledges	
Council outcomes	CO22 , CO23 and CO26
Single Outcome Agreement	SO4

Mark Turley

Director of Services for Communities

Contact: Gavin Sherriff, Traffic Orders & Project Development Assistant

E-mail: gavin.sherriff@edinburgh.gov.uk | Tel: 0131 469 3309

Executive summary

Objections to Nine Hour Parking Places Traffic Regulation Order

Summary

At its meeting on 10 May 2011 the Transport, Infrastructure and Environment Committee approved the recommendations in the '[Nine Hour Parking in the Extended Controlled Parking Zone](#)' report.

Committee approved the start of the legal process to amend the charging structure of the nine hour parking places in N1, N5, S2, S3 and S4. A map showing the locations of these parking places is included in Appendix Three. The effect of the Order would be to remove the three hours minimum charge period, allow pro-rata payments and to introduce a maximum charge of £3.00 for nine hours of parking.

Recommendations

It is recommended that the Transport and Environment Committee:

- repels the three objections and that the Council proceeds to make the Order; and
- notes that the usage of all nine hour parking places will be monitored during the first six months after the charges have been changed and that a report on the results of the monitoring process will be reported to a future meeting of this Committee.

Measures of success

These changes aim to provide more parking opportunities for motorists who need to park on-street for longer periods of time during the day in the Extended Zones of the Controlled Parking Zone (CPZ). This has the potential to reduce commuter parking pressures in adjacent residential streets on the fringes of the CPZ. It is also considered that increasing the flexibility of the controls will make more parking places available for motorists who only need to park for short periods of time.

The changes may also help residents in, for example, the Shandon area, who live outside of the CPZ and on occasion need to park in the nine hour parking places near their homes. The proposals will successfully address their concerns regarding paying the minimum charge period when they only park for a short period of time before the end of the controlled hours.

Once the changes are introduced the six months monitoring period will commence. Should that review find that the proposed charge, of £3.00 per day, is not reasonably managing the demand for the parking places then it would be recommended to Committee that the parking charge is increased.

Financial impact

Experience from other nine hour parking places in S1, N2 and N3 (the locations of these spaces can be found in Appendix Three) where similar changes have already been introduced, has suggested that there is more flexibility in the controls and the new parking charges better reflect the needs of road users (more information regarding the usage of these parking places can be found in Appendix Two). As a result, there may be a small increase in parking income from the nine hour parking places.

There is a small cost to modify the ticket machines and make the Traffic Order and these will be met from within the current Transport budget in the financial year 2012/13.

Equalities impact

Consideration has been given to the relevance of the Equalities Act 2010 and it is not considered that a full Equalities Impact Assessment (EqIA) is required.

Sustainability impact

There are no adverse environmental impacts arising from this report.

Consultation and engagement

A public consultation was carried out between 20 January and 14 February 2012 as part of the Traffic Regulation Order (TRO/11/27) process. This included informing 'statutory consultees' such as; the emergency services, utility companies, Community Councils and public transport operators. In addition, street notices were placed on lamp and sign posts next to the relevant parking places and an advert was placed in The Scotsman on Friday 20 January 2012. Information was also put on the Council's website and the national public information notices portal, Tell Me Scotland. Three objections were received during the public consultation.

Unfortunately, a number of incorrect media articles during September 2012 suggested residents still had the opportunity to object to the proposals but this was not the case.

However, it was ascertained that while Merchiston Community Council (MCC) was informed of the proposals on 19 January 2012, its electronic mailbox was full and the Council's e-mail was returned undelivered. Therefore, further consultation was conducted with MCC to seek their comments on the plans and this included feedback from discussions with local residents. The consideration of those remarks can be found in Appendix One: Detailed Analysis of Objections and Further Consultation.

A briefing note was circulated to all Councillors on the proposals and a briefing session was attended by eight Councillors, including the Convener of the Transport and Environment Committee, in October 2012. The aim was to better explain the reasons behind the proposals, to answer questions and to discuss any concerns.

Background reading/external references

[Nine Hour Parking in the Extended Controlled Parking Zone](#). Transport, Infrastructure and Environment Committee Report, 10 May 2011.

Appendix One: Detailed Analysis of Objections and Further Consultation.

Appendix Two: Results of Nine Hour Parking Places Monitoring.

Appendix Three: Locations of Nine Hour Parking Places.

Appendix Four: Map of Nine Hour Parking Places.

Objections to Nine Hour Parking Places Traffic Regulation Order

1. Background

- 1.1 At its meeting on 10 May 2011 the Transport, Infrastructure and Environment Committee approved a report which recommended amending the charging structure in certain nine hour parking places in the CPZ.
- 1.2 The purpose of that report was to seek approval to start the legal process to harmonise the regulations across all nine hour parking places in Edinburgh. Similar bays in S1, N2 and N3 have already changed to the new charging structure.
- 1.3 Nine hour parking places allow motorists to pay to park for a full day's controlled period, 8.30am to 5.30pm, Monday to Friday in the Extended Zones of the CPZ.
- 1.4 This report aims to inform Committee of the representations made when the TRO to amend the conditions of nine hour parking places in N1, N5, S2, S3 and S4 was advertised for public comment. There are no nine hour parking places in N4.

2. Main report

- 2.1 The proposals were advertised for public comment between 20 January and 14 February 2012. During this period three objections to the proposed changes were received.
- 2.2 A report on the content of those three objections was submitted to the Transport, Infrastructure and Environment Committee at its September 2012 meeting. Committee decided to continue consideration of the matter to the next meeting to allow an additional members' briefing to take place.

- 2.3 There was also, at this time, a number of local press articles regarding the proposals and these helped to reveal that while MCC had been sent details of the proposals they had not received them as their electronic mailbox was full. As a result, further consultation took place with MCC and a submission was received representing the views of some local residents. These views are presented in Appendix One.
- 2.4 Since the next Committee was less than one month away in October, it was considered that this was too short a period to provide a comprehensive briefing for members, consider their feedback and investigate any additional comments properly. Therefore, it was considered appropriate to submit the report to the first Committee meeting in 2013.

The Proposals

- 2.5 The nine hour parking places provide an opportunity for motorists who need to park for longer periods of time within the CPZ. The minimum stay period, of three hours, was intended to prevent all the spaces being used by motorists who only need to park for short periods of time. Thereby, removing the opportunity to park for longer if the parking place was full of short-term parking vehicles.
- 2.6 However, there is little evidence to suggest that such demand exists under the current charges or conditions. While motorists were expected to stay for longer periods of time at these locations, it has been ascertained that, in some locations, there is a greater demand from those who only need to park for brief periods. Therefore, rather than helping customers as intended, the minimum stay requirement has actually become a barrier for many people.
- 2.7 The removal of the minimum charge to a pro-rata structure will increase the flexibility of the parking controls.
- 2.8 There are commuter parking pressures in many areas around the boundaries of the CPZ. It is unsustainable for the Council to continue to propose more parking controls in each area where problems exist with the expectation that commuters will or can change their mode of travel.
- 2.9 There is an opportunity for the current nine hour parking places to provide an alternative parking solution for motorists who already park in unrestricted residential streets in Edinburgh. Priority Parking consultations around the edges of the CPZ, have consistently elicited requests from residents for previous extensions of controlled parking to be repealed, as they consider many of their own parking problems were created by the previous actions of the Council.

- 2.10 The proposals in this report have the potential to address residents' concerns and help tackle parking pressures in these streets with a reasonable and managed approach. It is also easier to regularly monitor the use of public parking places as opposed to intrusive non-residential parking in uncontrolled streets.
- 2.11 It remains a priority to encourage motorists to choose more environmentally friendly transport solutions and to minimise their need to travel by car. To support these policies, the Council has introduced measures that include Park and Ride sites, improved bus priority measures, bus lane camera enforcement to help reduce bus journey times and the first Quality Bike Corridor from King's Buildings to George IV Bridge.
- 2.12 However, it is recognised that there are occasions when there is no reasonable alternative to car travel and that part of this demand is reflected in the continuing commuter parking presence in Edinburgh. With this in mind the Council's new Priority Parking areas, were designed to help residents park closer to their homes by spreading pressures over a wider area but without removing all non-residential parking.
- 2.13 Nine hour parking places have a role to play in supporting this approach by helping to accommodate existing parking pressures. The intention of the proposals is not to increase the number of car journeys into the city but to spread the existing pressures over a wider area. Monitoring of any changes will include on-street observations, interrogation of transactional data, monitoring accident statistics and listening to feedback from motorists and residents to ensure that demand is appropriately managed.
- 2.14 This proposal aims to harmonise the parking charges and conditions at all nine hour parking places throughout the CPZ. Nine hour parking places in S1, N2 and N3 have already changed to the new charging structure and are considered to be operating successfully. Motorists are happy that the changes have again allowed them to access local amenities such as allotments, dentists, visiting the city's parks as well as finding appropriate parking for school visits.
- 2.15 The three hour minimum payment is a barrier to some motorists and penalises those who only need to park for a short period. The removal of the minimum payment has made parking fairer, easier to understand and now better meets the needs of residents, visitors, shoppers and business users.
- 2.16 It also appears to have reduced the number of complaints received from motorists. Many considered that the rules were confusing, designed to maximise income and penalise those who did not want to park all-day; removing the minimum payment has made parking easier for all road users.

Results of Monitoring

- 2.17 The first flat rate daily charge of £2.00 per day was introduced in Zone S1, in Dick Place and Lauder Road, in January 2010. The level of usage of these parking places was monitored over a period of several months, during which time it was noted that the usage level had risen significantly. That monitoring resulted in a report to Committee, in July 2010, containing a recommendation that the daily charge should be increased to £3.00. That same report recommended creating additional nine hour parking places in Grange Loan, Hope Terrace and Beaufort Road, all of which would operate with a daily charge. In the case of Beaufort Road, the daily charge would be set £5.00, in recognition that, due to its location in proximity to local shops, businesses and cafés there may be higher demand for those spaces.
- 2.18 Those changes were introduced in September/October 2011, which provides, at the time of writing, approximately one year of data for all of the nine hour parking places with a flat rate daily charge. The month of August was chosen to compare the parking usage before and after the introduction of the flat-rate charge. It is also reasonable to consider this month as demand is likely to be higher due to Edinburgh's festivals.
- 2.19 In the majority of instances the number of transactions made increased only slightly after the introduction of a flat-rate charge. The exceptions to this are Grange Loan, where transactions reduced in number and Fettes Avenue/Carrington Road, where there were previously no charges for parking.
- 2.20 While historical data is not available for individual transactions, it is possible to make certain assumptions based on the available information.
- 2.21 The number of transactions and the level of income from Beaufort Road indicate that the majority of users are parking for short periods of time. While the average payment has risen (from approximately £0.90 to £1.60), it would be difficult to conclude that there were more than six or seven users, on a daily basis, paying the £5.00 charge.
- 2.22 Conversely, while the number of transactions in Dick Place has remained relatively constant since the daily charge was introduced, an analysis of the data indicates that the average payment has remained close to the maximum amount that could be paid. When the daily charge was £2.00, the average payment was £1.71, rising to £2.71 once the daily charge increased to £3.00. While this information indicates that there is a high level of all-day payments, it also indicates that there are still spaces within these parking places that are being used for shorter lengths of stay.

- 2.23 The same scenario is repeated in Hope Terrace, Arboretum Place, Inverleith Place, East Fettes Avenue and Fettes Avenue. In each case the average payment indicates that all-day usage does not prevent the use of these parking places for other, short term parking. The data for Lauder Road, Inverleith Terrace and Carrington Road indicates that usage levels are relatively high and that there is unlikely to be any significant availability of space during the hours of control.
- 2.24 What can generally be taken from this information is that there are different usage levels depending on the location of the parking places. The parking places that are the busiest are those closest to the city centre or are the most conveniently located to bus routes, local shops or business areas. These parking places are also where there is the greatest use of the all-day facility. The exception to this is Beaufort Road, where the usage strongly suggests that the £5.00 charge is too high to attract all-day users.
- 2.25 Clearly, the desired level of usage for all-day parking can be managed by modifying parking charges. This could mean an increase in the parking charges at locations that are already well used, or a slight reduction in the charge in other, underused areas as a means to encourage better use of those parking places.

The Proposed Charging Level

- 2.26 The Council will no longer be able to accept five and 10 pence coins due to their forthcoming design changes. Therefore, the minimum parking time that can be purchased is £0.20 for 12 minutes. This equates to £1.00 per hour and is the same as all public parking places in the Extended Zones of the CPZ. Parking time up to three hours can be purchased on a pro-rata basis, while a payment of £3.00 will allow motorists to park for the full nine hours.
- 2.27 Monitoring of the usage of the S1, N2 and N3 nine hour parking places has revealed that there is a general availability of parking places. The charge levels will continue to be reviewed to ensure the correct balance is reached and that long-stay parking does not impact upon the flexibility of these parking places. More information regarding the results of the monitoring exercise is available in Appendix Two.

Conclusions

- 2.28 The proposals intend to harmonise the regulations across all nine hour parking places in Edinburgh, increase the flexibility of the parking controls and make paying for parking simpler for all road users.

- 2.29 Encouraging car drivers to use more environmentally friendly and healthier travel options remains a priority but it, along with proposing more parking controls, can not be the only solution available to address commuter pressures in residential areas. Investigating the use of nine hour parking places to spread pressures across a wider area and in streets with lower residential demand is an option that should be considered.
- 2.30 While it is proposed to introduce a maximum charge of £3.00 per day, there is scope for this charge level to increase in the future. Part of the approach includes a monitoring and review procedure so that an appropriate level can be found for all-day parking. The aim must be to ensure that longer term parking opportunities are available but that they are not used excessively.
- 2.31 Should occupancy levels increase considerably and be maintained at a level that does not ensure a general availability of parking space, then the parking charge can be raised incrementally in order to find its natural level. Once Committee has given its approval, by notice procedure, within four to six weeks.

3. Recommendations

- 3.1 It is recommended that the Transport and Environment Committee:
- repels the three objections and that the Council proceeds to make the Order; and
 - notes that the usage of all nine hour parking places will be monitored during the first six months after the charges have been changed and that a report on the results of the monitoring process will be reported to a future meeting of this Committee

Mark Turley

Director of Services for Communities

Links

Coalition pledges

Council outcomes

CO22 - Moving efficiently – Edinburgh has a transport system that improves connectivity and is green, healthy and accessible.
CO23 - Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community.
CO26 - The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives.

Single Outcome Agreement

SO4 - Edinburgh's communities are safer and have improved physical and social fabric.

Appendices

- 1: Detailed Analysis of Objections and Further Consultation.
- 2: Results of Nine Hour Parking Places Monitoring.
- 3: Locations of Nine Hour Parking Places.
- 4: Map of Nine Hour Parking Places.

Appendix One

1. The first objection received was from the Cyclists' Touring Club (CTC) Lothians. They object as they consider the proposals will encourage more cars into the city, cause congestion and increase the risks to cyclists with more traffic on the road. In addition, they have concerns regarding additional CO² emissions and a loss of revenue for the Council with reduced daily charges.
2. The aim of these changes is not to encourage commuters to bring their vehicles into the CPZ, but to provide more parking opportunities for those who already park either in the city centre or in uncontrolled streets surrounding the CPZ. All-day commuter parking in residential areas inconveniences residents and prevents them from parking close to their homes.
3. The nine hour parking places were originally located in streets where there were lower levels of residential demand. Simplifying the charging structure has the potential to encourage those who already park in uncontrolled areas to use these places and spread parking pressures over a wider area, thereby reducing their overall impact.
4. By allowing both short-term users and encouraging long-term users from other areas to use these spaces, there is the potential to reduce congestion and the impact of pollution. Providing more parking opportunities elsewhere for those already competing for limited parking space, will help to prevent commuter vehicles circling an area waiting for a resident to vacate a parking space in the morning. There will also be another area for motorists to park in so everyone is not driving toward the same destination.
5. It is not considered that these proposals will have a negative impact on road safety or significantly increase CO² emissions in the city. Accident data will also be considered as part of the review process to ascertain if there are any identifiable trends due to the proposed changes.
6. Income generation is not the main priority behind these changes. It is based upon increasing the flexibility of the controls and managing demand.

7. The second objection was received from the Cockburn Association. They object to all-day parking within the CPZ being priced at a level below a Lothian Buses (LB) DAYticket. Furthermore, they do not consider this complements the Council's sustainable transport objectives of increasing the use of public transport, cycling and walking around the city. They suggest that the current parking charges should continue and another solution should be found for any commuter parking pressures in residential areas.
8. While it is the case that a LB DAYticket (currently £3.50) is priced higher than the proposed nine hours parking charge, this is not a true comparison. The price of a DAYticket has also increased since this parking charge level was initially proposed. Plus, the aim of an LB DAYticket is to provide better value for its customers who intend to make three or more journeys in one day.
9. Conversely, nine hour parking places only offer better value to drivers if their vehicle is parked for the entire day. If a vehicle leaves the place and returns later in the day, additional parking time should be purchased or the vehicle may be issued with a parking ticket.
10. If motorists use their vehicle on several occasions throughout the day, then they are likely to pay more for parking than they would for a LB DAYticket.
11. In addition, if a motorist wants to park their vehicle for the whole nine hours it is still cheaper to purchase two SINGLEtickets and make use of the Council's free Park and Ride facilities, than using a nine hour parking place. In the longer-term LB fares are cheaper when compared to parking charges. There are of course other operating costs that need to be considered when driving a car.

	Charges for on-street parking			
	One Day	1 Week	4 Weeks	Annual
Cost as per Proposed Parking Charges	£3.00	£15.00	£60.00	£780

	Charges on Lothian Buses				
	Daily		Ridacard		
Type	(two singles)	(One day ticket)	Weekly	4 – weekly	Annual*
Cost	£2.80	£3.50	£17.00	£51.00	£576

*Paid by Direct Debit.

12. Increased use of public transport and encouraging active travel remain priorities for the Council. It is not considered that this minor change in traffic management arrangements contradicts those aims. Any changes will continue to be monitored and reviewed, so that an appropriate charge level is set.
13. While it is preferable to tackle commuter parking pressures through other methods, such as changing driver behaviour, the continuing financial situation faced by this Council indicates that all available solutions must be considered. This option is just one of the solutions being considered and it is a low-cost option that has the potential to help make an immediate improvement for local residents.
14. The third objection was received from SPOKES, the Lothian cycle campaign. Their main concerns are that the Order proposes to increase the number of nine hour parking places, encourage more vehicles into the city centre particularly during rush hour periods. SPOKES argue that this is against Council travel policies and will discourage bicycle use as there will be an increase in traffic volumes.
15. This Order does not propose any increase to the number of nine hour parking places in Edinburgh. The intention is to amend the conditions of the current nine hour parking places to make them more flexible and to better manage existing demands from motorists who need to park all day.
16. The removal of the minimum stay requirement has the potential to help spread parking pressures, currently experienced on the fringes of the CPZ, across the road network, thereby lessening their overall impact. Evidence gained from Zone S1 shows that there is a demand for such parking places within the CPZ and they can encourage commuters who normally park their vehicles in nearby residential streets to use these places.
17. Therefore, the intention is not to encourage more people to commute by private car but to provide more parking opportunities for existing levels of demand.
18. This Order is only one slight change to the parking regulations and active travel, such as walking and cycling, continues to be a priority for the Council.

Further Consultation

19. The submission from MCC revealed a number of reasons why they were opposed to the amendment of the parking charge level to £3.00 per day. It has been suggested that congestion will increase, streets will become car parks and the proposals will have a negative impact on both air quality and road safety.

20. MCC has indicated its support for a reduction in the minimum stay requirement as they see some potential benefits in allowing this.
21. They have also raised their dissatisfaction with the public consultation process and consider that letters should have been sent to all households within the CPZ. The Council does not have any powers to vary the Traffic Regulation Order process and leafleting each household within the CPZ would not guarantee that all relevant parties, who may be interested in the proposed changes, would be reached.
22. It is unfortunate that, in this case, there appears to have been a number of isolated errors in relation to the original consultation letter while the replacement letter and e-mail were both undelivered.
23. This has led to an impression that information was being withheld from residents, that their views were being disregarded and that more nine hour parking places were being introduced. This is not the case on each of these three matters.
24. The TRO process itself requires the Council to inform 'statutory consultees' of the proposals twice. Community Councils are considered as a statutory consultee in this regard. The first stage of consultation is intended to identify any functional reason for a proposal not to proceed. However, formal objections cannot be accepted at that time. It is unfortunate that this suggests a mixed message from the Council, although it should be explained that the inclusion of bodies such as Community Councils in this initial stage is considered to be a means of ensuring that such groups are kept informed of changes proposed in their area. While there is no legal requirement to consult such groups, it must be considered appropriate and worthwhile to do so.
25. It is not the case that the Council are encouraging more commuter vehicles into the city centre or failing to support policies which promote public transport. Commuter parking pressures continue to persist on the boundaries of the CPZ and pricing any parking place at an unaffordable level is clearly counter productive. The aim of this proposal is to start a process which naturally finds a suitable price for all-day parking in the CPZ where parking opportunities are available but at a reasonable level, while the Council will continue to invest in active and healthier modes of travel and public transport.

26. Turning to the specific points regarding the TRO raised by MCC:
27. **(1) MCC opposes the introduction of a £3.00 per day parking charge in residential streets where nurseries and schools are present. They consider that this goes against Council policies on promoting public transport and will increase congestion to pre-CPZ levels. It is stated that these proposals will prevent any solution being found in the Shandon area.**
28. Whilst not ideal, commuters already park in uncontrolled residential streets where nurseries and schools are present around Edinburgh. The £3.00 daily rate will be kept under review and can be increased relatively quickly should parking demand increase to a point where other users can be shown to have been disadvantaged by an extensive increase in parking volumes.
29. A previous proposal from the Council to include the Ashley/Harrison area within the S4 CPZ was recently rejected by residents. Elected members, resident representatives and Council officers from the south-west neighbourhood office and from Parking Operations are working together to investigate possible solutions to address parking problems in the Shandon area. Nine hour parking is a separate issue from those parking problems and would not therefore, prevent any potential solution for Shandon from being considered.
30. **(2) The majority of the parking places in question are shared-use and are in areas of high density housing where residents need to park on-street.**
31. The aim is to provide more parking opportunities in areas where there is lower residential demand and the locations of the nine hour parking places were chosen for this reason.
32. **(3 & 4) Parking opportunities may be reduced for parents dropping off and collecting children from George Watson's College, the Steiner School and nurseries in Spylaw Road.**
33. It is not the intention of the proposals to permit commuter occupancy levels to reach 100% of capacity. In addition, more spaces will be available and at a much reduced rate for parents who need to park for short periods to drop off and collect their children from local educational establishments.
34. **(5) The proposals will result in a negative visual impact as there are currently no parked cars in the area. Bikes and cars share the same road space making it safer.**

35. It is not considered that changing the regulations of current parking places on-street will negatively impact on Edinburgh's World Heritage Site status. While it is safer for pedestrians, especially young and older people, to cross the road where there are no parked cars, a balance must be found that is suitable for all road users. For instance, removing parking places favours pedestrians but it is unlikely to be in the interests of residents' permit holders in the street. There are many streets in Edinburgh where parked cars, cyclists, pedestrians and moving vehicles share the same road space safely and there is little to suggest this will not be the case in the streets in question.
36. MCC have indicated, from the recent 20mph pilot scheme consultation, that residents consider Spylaw Road to be one of the most dangerous roads in the area due to the speed of the traffic. Often motorists will perceive streets with parked vehicles by the side of the road to be narrower and as a result reduce their speed, making it safer for cyclists. Therefore, the absence of parked cars and increased visibility could make it more likely that motorist's drive with excessive speed in Spylaw Road.
37. **(6) The Order has two proposals rolled into one; removing the minimum charge period and allowing all day parking for £3.00 per day.**
38. It is considered appropriate to introduce these two proposals at the same time, as they both relate to the nine hour parking places. If demand for the nine hour parking places becomes excessive, then the daily price can rise to increase short-term parking opportunities.
39. **(7) Parking charges will be as cheap as bus travel and so dis-incentivises the use of public transport, reducing LB income.**
40. A LB four week bus pass is £51.00, while the cheapest payment option is £48.00 a month by Direct Debit. Therefore, taking the bus still offers the best value for commuters. Furthermore, this comparison does not take into account other motoring costs which must be considered when driving a car. There is no evidence available to suggest that amending parking charges directly affects LB income, or specifically that these proposals will reduce LB income by nearly £400,000 per year. There is little to suggest that commuters who currently take the bus will start to use their cars instead due to the proposed changes.
41. **(8) What evidence suggests that commuters will move to areas where all-day parking is available for £3.00 per day? Commuter traffic should remain in Craiglockhart and if they block drives then the Police should take action or double yellow lines should be introduced.**

42. The proposals aim to offer an alternative parking location for motorists who already park in residential streets. The intention is to offer another option to help residents in these areas, who live with uncontrolled commuter parking. Parking in a CPZ can be managed better with marked parking places and restrictions to prevent inconsiderate parking across driveways. There are no plans to introduce double yellow lines across private accesses in the city.
43. In addition, should MCC be correct in their report that commuters do not want to pay anything for their parking and will continue to park in unrestricted streets where there is no charge, then it is likely that the proposals will have little impact and the parking places will not be full of commuter vehicles.
44. **(9) There will always be pressure on the boundaries of the CPZ but the Council is pandering to the commuter lobby who have not yet changed their behaviour to use active travel or public transport. Introduce 'soft CPZs' on the fringes of the CPZ which run from 9.30am to 4.30pm.**
45. The Council has previously decided that further extensions to the CPZ are not viable due to the financial considerations and the impact of moving commuter parking pressures to other areas. However, Priority Parking aims to tackle commuter pressures by giving residents a better chance to park nearer their homes during the day without completely removing non-residential vehicles from the area.
46. The 'soft CPZ' suggestion includes two significant assumptions; one, that all commuters have an alternative choice to using their car and secondly that the local residents who do not buy parking permits to park in the street during the day are themselves not commuters going to other parts of the city or choosing to park outside of the CPZ.
47. **(10) Motorists from outside the CPZ and Edinburgh are being treated with more favourably by the Council than residents within its area.**
48. The Council is considering the views of MCC and residents within the CPZ, but it also needs to think of residents living just outside the CPZ. As roads authority, the Council must find an equitable balance on the use of kerb side space to ensure that parking opportunities are available for all motorists, such as residents, visitors, shoppers and business users, using Edinburgh's roads. With recent changes to bus services in East and Midlothian there are fewer accessible options open to many commuters than before.
49. There are also 13 individuals whose comments to MCC were appended to the submission. Most of these comments formed the basis of the above arguments, but several additional observations will now be reported.

50. There is an assumption that resident permit holders will be competing with out-of-town commuters for the shared-use parking places while paying the same amount for their permit but with less parking opportunities. Full occupancy of nine hour parking places by visitors using the pay and display facility will not be permitted and the pricing will be adjusted to manage demand.
51. It is the case that residential demand for parking places falls during the day within the CPZ. It is considered that this excess capacity could be put to better use by other motorists if the minimum charge was removed and the daily rate was reduced.
52. Some residents view the proposals as a return to pre-CPZ which is not the aim nor is it likely to be the result. The limited number of parking places included in the plans are already in locations where there are lower demands for residential parking and pricing will continue to be reviewed to ensure there are parking opportunities available for residents.
53. Additionally, a number of criticisms were raised regarding the public notification procedures. Letters were not sent to every household in the streets with the nine hour parking places as this does not guarantee each interested person would be notified, for example MCC have received comments from residents in streets where no changes are being proposed. Street notices were erected adjacent to the parking places in legible print on laminated A4 pieces of paper. The language that is used on the notices must conform to legislation and the Council has no powers to amend this.
54. It has been suggested that the current price must be increased to encourage more use of public transport. The parking places are not used excessively at this time and this does not indicate that a price rise is necessary.
55. There are additional concerns that an increase in parked vehicles will have a negative impact on road safety, for pedestrians, cyclists, residents exiting their drives and for vehicles manoeuvring to park. While these are genuine concerns, there are many other streets in Edinburgh where similar circumstances occur both inside and outside of the CPZ. This does not necessarily result in an increase in collisions.
56. The CPZ was not extended with the aim to 'return the streets to residents' but to provide those who needed to park on-street during the day with better parking opportunities nearer their homes.

Current 9 Hour Parking Places Working at £3.00 Maximum Charge

Zone	Street	Type	Spaces	Aug-09		Aug-10		Aug-11		Aug-12	
				Income	Transactions	Income	Transactions	Income	Transactions	Income	Transactions
				S1	Dick Place	Shared-Use	10	£152.30	125	£616.65	361
S1	Lauder Road	Shared-Use	20	£1,422.90	409	£1,341.05	658	£1,378.80	659	£1,734.30	604
S1	Grange Loan	Shared-Use	19	£43.80	82	£61.55	82	£85.60	108	£62.20	52
S1	Hope Terrace	Shared-Use	13	£238.35	184	£189.15	140	£309.90	187	£559.60	228
S1	Beaufort Road	Public	18	£789.50	1106	£901.15	936	£865.90	916	£1,679.60	1041
N2	Arboretum Place	Shared-Use	24	£871.15	424	£2,523.20	796	£3,427.80	1196	£2,948.30	1423
N2	Inverleith Place	Shared-Use	51	£2,772.55	1736	£318.60	89	£646.95	200	£900.90	387
N2	Inverleith Terrace	Shared-Use	65	£2,675.75	793	£2,932.60	609	£3,770.20	882	£4,290.70	1498
N3	Carrington Road	Public	169	*	*	*	*	*	*	£6,884.90	2403
N3	East Fettes Avenue	Shared-Use	60	£1,667.65	1311	£596.10	152	£624.85	176	£1,402.70	520
N3	Fettes Avenue	Public	142	*	*	*	*	*	*	£8,531.90	3599
Total Spaces			591								

KEY **Bold**

*

Not nine hour parking places at this time

No charges at these nine hour parking places

£2 All day charge

£3 All day charge

£5 All day charge

East Fettes Avenue It was ascertained in 2009 that nine hour parking places were not in the correct locations as so ticket machine data relates to income based on a four hour maximum stay

Appendix 3 - Locations of 9 Hour Parking Places

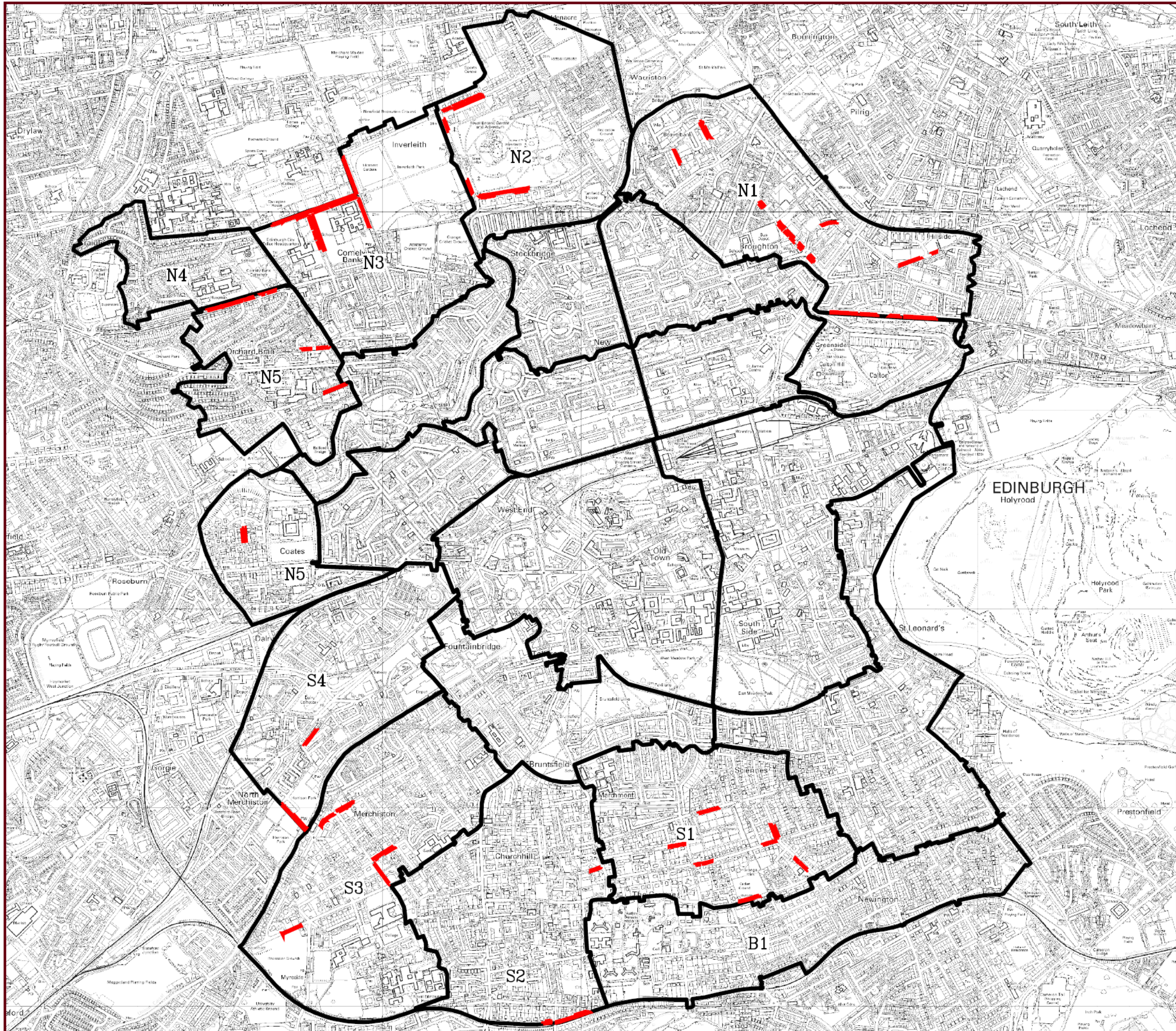
Zone	Street Name	Type	Number of Spaces	Proposed Daily Rate of Charge
N1	Annandale Street	Shared-use	76	£3.00
N1	Beaverbank Place	Shared-use	12	£3.00
N1	Beaverhall Road	Shared-use	24	£3.00
N1	Brunswick Road	Shared-use	26	£3.00
N1	Hopetoun Crescent	Shared-use	12	£3.00
N1	London Road	Public	74	£3.00
N5	Craigeith Road	Public	46	£3.00
N5	Orchard Brae Avenue	Shared-use	17	£3.00
N5	Ravelston Terrace	Public	20	£3.00
N5	Wester Coates Road	Shared-use	22	£3.00
S2	Cluny Avenue	Shared-use	30	£3.00
S3	Colinton Road	Shared-use	18	£3.00
S3	Polwarth Terrace	Shared-use	43	£3.00
S3	South Ettrick Road	Shared-use	20	£3.00
S3	Spylaw Road	Shared-use	30	£3.00
S4	Dundee Terrace	Shared-use	16	£3.00
S4	Harrison Road	Shared-use	46	£3.00
Total number of spaces proposed			532	

NOTES

KEY:



9hr PARKING PLACES



APPENDIX 4 : MAP OF 9hr PARKING PLACES

The material contained in this plot has been reproduced from an Ordnance Survey map with the permission of the Controller of HMSO, Crown Copyright.



Scale: 1:14027



Date: 09/11/12

Drawn By:

Drawing No: