

Licensing Sub-Committee of the Regulatory Committee

9.45am, Tuesday, 5 March 2024

Proposed Parking Controls, Bell's Mills and Dolphin Gardens West

Executive/routine
Wards

Executive
5 - Inverleith, 2 - Pentland Hills

1. Recommendations

1.1 It is recommended that Licensing Sub-Committee:

1.1.1 In respect of Traffic Regulation Order TRO/22/16:

1.1.1.1 Set aside the objections to the Traffic Regulation Order TRO/22/16 as previously advertised and authorised by the Transport and Environment Committee on 31 March 2022; and

1.1.1.2 Approve the making of TRO/22/16 as advertised to add shared use parking bays within Bell's Mills to the N5 area of the Controlled Parking Zone (CPZ).

1.1.2 In respect of Traffic Regulation Order TRO/21/12:

1.1.2.1 Set aside the objections to the Traffic Regulation Order TRO/21/12 as previously advertised and approved by the Head of Network Management and Enforcement under delegated authority in May 2021; and

1.1.2.2 Approve the making of TRO/21/12 as advertised to introduce waiting restrictions at Dolphin Gardens West.

Paul Lawrence

Executive Director of Place

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Report

Proposed Parking Controls, Bell's Mills and Dolphin Gardens West

2. Executive Summary

- 2.1 This report details the outcome of the advertisement of two draft Traffic Regulation Orders (TRO/22/16 and TRO/21/12) for proposed parking controls, including objections relating specifically to two locations – Bell's Mills (West End) and Dolphin Gardens West (Currie).
- 2.2 As more than six objections have been received for both TRO/22/16 and TRO/21/12, authority is sought to make the advertised Traffic Regulation Order (TRO) with amendments as outlined in this report, namely, to proceed to implement the revised Bell's Mills proposals, and to proceed to implement the Dolphin Gardens West proposals.

3. Background

Bell's Mills TRO/22/16

- 3.1 For a number of years, restrictions that should have been in-place along the full extent of Bell's Mills in the West End had not featured on carriageway, therefore what was on the ground did not match the legal traffic order. This resulted in sections of unrestricted parking on Bell's Mills and therefore unregulated parking opportunities within zone 5 of the Controlled Parking Zone (CPZ). This was rectified in August 2022, with yellow line restrictions put onto the carriageway to match the traffic order.
- 3.2 In addition to ensuring the restrictions on Bell's Mills were implemented to match the legal order, and due to parking pressures in the local area with there being more people with parking permits than parking bays available, on 31 March 2022, Transport and Environment Committee [approved](#) the commencement of the legal process required to amend the existing restrictions to formalise parking places within Bell's Mills. In August 2022, the

Council formally advertised the proposals through draft traffic order TRO/22/16 in accordance with legislative requirements.

Dolphin Gardens West TRO/21/12

- 3.3 Dolphin Gardens West in Currie was one of several locations proposed through a *Proposed Amendments to Waiting and / or Loading Restrictions* report, approved by the Head of Network Management and Enforcement under delegated authority in May 2021. In February 2023, the Council formally advertised the associated location proposals through draft traffic order TRO/21/12 in accordance with legislative requirements.

Legal Framework and Council Scheme of Delegation

- 3.4 The TROs were made in terms of Section 1 of the Road Traffic Regulations Act 1984. The detailed process for making a TRO is set out in the Local Authorities Traffic Orders (Procedure)(Scotland) Regulations 1999. In terms of the Regulations given the scope of both TRO/22/16 & TRO/21/12 where there remain unresolved objections, it remains a matter for the Council as Roads Authority to determine whether to proceed to make each order as advertised.
- 3.5 In terms of the Council's statutory scheme of delegation the Executive Director of Place has the power to make TROs provided no statutory objections are received and no more than six material objections are received from the public. As more than six objections have been received for both TRO/22/16 and TRO/21/12, Committee approval is required to make the TROs.
- 3.6 Where the decision on whether to approve a TRO is referred to the Committee, it may either:
- 3.6.1 Approve the TRO as advertised;
 - 3.6.2 Approve the TRO with minor modifications, provided such modifications would not extend the application of the order or increase the stringency of any prohibition or restriction contained in it (Regulation 10 of the 1999 Regulations);
 - 3.6.3 Direct that a public hearing is to be held on the proposed TRO, in terms of Regulation 8 of the 1999 Regulations, chaired by an Independent Person;
 - 3.6.4 Approve making the TRO in part; or
 - 3.6.5 Refuse the TRO.

4. Main report

Bell's Mills TRO/22/16

- 4.1 The Bell's Mills proposals, to install shared use parking bays (Appendix 1) advertised under TRO/22/16, received nine objections.
- 4.2 The main themes associated with the objections (Appendix 2) were access issues associated with formalised parking provision and road geometry - with Bell's Mills being a narrow cul-de-sac on a hill with a ninety-degree bend. Concerns thus centred on narrow carriageway space being taken up by parking creating access difficulties for large goods vehicles, emergency vehicles and general manoeuvrability in winter weather linked to the road gradient.
- 4.3 Residents were also concerned that shared use parking bays would see a return to issues previously experienced (prior to restrictions being implemented), with the street used by guests of the nearby hotel as an overflow car park, and instances of anti-social behaviour by hotel guests.
- 4.4 Based on the number and nature of objections raised, and as parking restrictions have already been introduced at this location, it is now proposed to revise the proposal to introduce shared parking bays into Bell's Mills. This would introduce a reduced number of shared use parking bays from eight down to five, which would help towards accommodating the known parking demand locally, whilst mitigating the safety and access issues established through the TRO consultation. The revised proposal is shown in Appendix 3.

Dolphin Gardens West TRO/21/12

- 4.5 The original request for parking restrictions on Dolphin Gardens West came from Waste Services, as parked vehicles on the corners of the street restricted access causing waste and other large vehicles to leave the carriageway and drive on and damage two adjacent grass areas. It is at these two locations - shown also in Appendix 1 - where the parking restrictions were proposed.
- 4.6 Of the 19 on-street locations proposed for parking restrictions as part of the advertised order TRO/21/12, Dolphin Gardens West was the only location to receive objections, receiving eight objections which are detailed in Appendix 4 and have been grouped by objection theme.
- 4.7 The main objection themes related to a loss of residents parking, which adversely impacts those with mobility difficulties (due to having to park further away from their homes) and parking pressures in the surrounding local area reducing alternative nearby parking opportunities.

- 4.8 As a result of these objections, officers have since engaged with Waste Services to establish if operations could be undertaken by using smaller waste collection vehicles, however, they have confirmed that such vehicles are not available, and they reiterated their support for restrictions at Dolphin Gardens West to assist with safe access.
- 4.9 With regards to the nature of the objections raised, it is the officers view that since most properties in Dolphin Gardens West have a driveway, and that only two corner sections of restrictions are proposed where large vehicles are forced to leave the carriageway, then there are still opportunities for residents to park in their driveways and on-street, with only a small number of property's not benefiting from off-street parking.
- 4.10 And as Dolphin Gardens West is not in a CPZ then this offers various unrestricted parking options in surrounding streets for anyone who cannot benefit from driveways or on-street parking opportunities on Dolphin Gardens West.
- 4.11 Due to the support by Waste Services for these restrictions and the associated operational and safety benefits associated with waste vehicles not having to leave the carriageway, and due to the alternative parking opportunities on-street and in driveways for residents of Dolphin Gardens West, it is recommended that Committee authorises this proposal to proceed, and for the legal order to progress to enable the introduction of restrictions in Dolphin Gardens West.

5. Next Steps

- 5.1 Although objections have been received in response to TRO/22/16, it is recommended that this proposal is implemented to help relieve some of the parking pressures in the local area associated with there being more parking permits locally than there are parking places. In addition, the objections that were raised at this location have been addressed through this report, with safe access maintained for all vehicle movements through these proposals.
- 5.2 Similarly, although objections have been received in response to TRO/21/12 it is recommended that this proposal should go ahead, as it will safely assist large vehicle movements to avoid such vehicles leaving the carriageway, and since the yellow lines would be installed mostly in front of residential properties featuring driveways, such off-street parking provision helps to reduce parking impacts upon local residents.

Implementation

- 5.3 Should Committee authorise the revised proposal of the Bell's Mills TRO, then all objectors will be contacted to advise them of this decision and the Council

will proceed to make TRO/22/16 to introduce a reduced number of shared use parking bays on Bell's Mills. It is anticipated that the changes proposed by the Order will begin to be implemented following Committee.

- 5.4 Should Committee authorise the commencement of the Dolphin Gardens West proposals, then all objectors will be similarly contacted to advise them of this decision and the Council will proceed to make TRO/21/12 to introduce parking restrictions at various locations including Dolphin Gardens West. It is anticipated that the changes proposed by the Order will begin to be implemented following Committee.

6. Financial impact

- 6.1 There are costs involved in processing the TROs and introducing shared use bays in Bell's Mills and parking restrictions in Dolphin Gardens West and the other locations contained in TRO/21/12 as well as for the introduction of signs and road markings associated with any new controls. These costs will be contained within existing Parking budgets.
- 6.2 The introduction of parking opportunities to Bell's Mills may result in a very small increase in parking income to the Council. This income will be allocated towards the operation of the Council's parking scheme and allocated to the funding of transport improvements, in accordance with the legislative requirements for income raised from parking charges.

7. Equality and Poverty Impact

- 7.1 The [City Mobility Plan](#) (CMP) sets out Edinburgh's strategic framework for achieving sustainable and effective mobility across the city. Policy measure Movement 17 within the CMP is focused on waiting and loading restrictions: 'Review, apply and enforce parking, waiting and loading restrictions whilst balancing the needs of local businesses and residents and people with mobility difficulties.
- 7.2 The 2019 CMP had an Integrated Impact Assessment (IIA) undertaken, and in December 2023 a 'Delivering Actions for Parking – Supporting Information: Waiting and Loading Controls on Main Traffic Routes' IIA was finalised as part of the broader CMP Implementation Plan, that has a focus encompassing parking restrictions on all street types, beyond main traffic routes. The [CMP](#) and the [Waiting and Loading Controls](#) IIAs are published and publicly available on the Council's website.
- 7.3 The waiting and loading restrictions IIA identifies the following positive impacts:

- 7.3.1 The ability to keep streets clear of hazardous parking always enabling the safe flow of traffic;
 - 7.3.2 Waiting or loading restrictions can help discourage private car use while encouraging the use of public transport as well as walking, wheeling, and cycling. Improved air quality (resulting from parking restrictions/management) within Edinburgh makes the city a more pleasant place to work particularly for those working outside; and
 - 7.3.3 Improved air quality also greatly helps children and young people, as poor air quality can damage lung development and can result in breathing conditions such as asthma.
- 7.4 Potential negative impacts to disabled people were identified in the IIA associated with parking restrictions, however, these are offset by the Council enabling Blue Badge holders to park free of charge and without time limit on yellow lines as long as they are not causing an obstruction to vehicle flow at that location.

8. Climate and Nature Emergency Implications

- 8.1 As a public body, the Council has statutory duties relating to climate emissions and biodiversity. As part of the City Mobility Plan a [Strategic Environmental Assessment](#) was carried out, which concluded that the cumulative impacts of managing private car use and reducing commuting by private car travel, as enacted through parking controls proposed in this report, would have a positive impact on reducing environmental impact and responding to climate change risk.

9. Risk, policy, compliance, governance and community impact

- 9.1 Traffic Regulation Orders (TRO) are required to enable enforcement of parking restrictions, this process includes a pre-TRO consultation period, followed by a statutory consultation period allowing the public to make representations in support of or object to the proposals. Comments are sought from the emergency services and other stakeholders in advance of public consultation. These legal requirements have been complied with for both TRO/22/16 and TRO/21/12.
- 9.2 Formal advertisements of traffic orders to the general public are communicated online, via local press, and street notices are erected on existing street furniture within affected streets, Community Councils and Councillors are also informed of proposals. These methods increase awareness to local residents and businesses of yellow line proposals, which

explains their opportunity to object or support the proposals. Both the legal requirements and the Council's usual additional steps to inform the public of proposals have been complied with for TRO/22/16 and TRO/21/12.

- 9.3 Comments received from the public are taken into consideration before determining whether to proceed with or abandon any proposals.
- 9.4 The recommendation to support the Bell's Mills revised proposal has been influenced by the TRO consultation feedback along with the permit parking demand in the wider area - zone 5 of the CPZ.
- 9.5 The proposals for parking restrictions in Dolphin Gardens West were met with notable opposition to the proposals (eight objections), with perceived negative impacts to those who cannot benefit from parking in driveways or those who require additional parking opportunities on-street. On-street parking opportunities will still exist, however, on Dolphin Gardens West and in neighbouring streets. Importantly, the proposals will eliminate the risk of large vehicles leaving the carriageway and driving over an area of grassland, that according to the consultation feedback, is used as a play area by children. The proposals also support Waste Services in carrying out collection operations in a safe and efficient manner.

10. Background reading/external references

- 10.1 None

11. Appendices

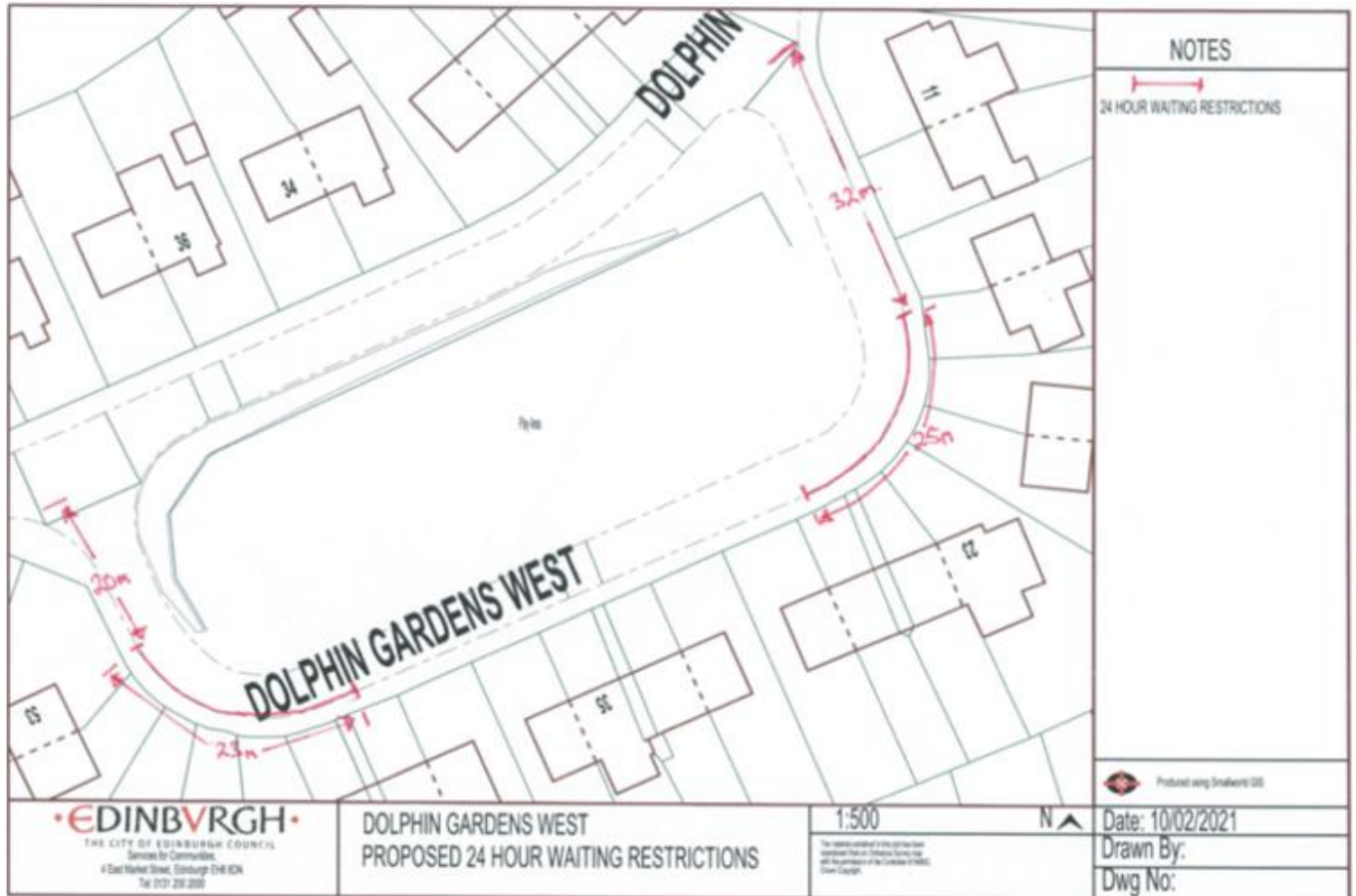
- Appendix 1 Proposals for Bell's Mills / Dolphin Gardens West.
- Appendix 2 Bell's Mills objections.
- Appendix 3 Consultation data Bell's Mills.
- Appendix 4 Revised proposals for Bells Mills.
- Appendix 5 Dolphin Gardens West objections.
- Appendix 6 Consultation data Dolphin Gardens West.
- Appendix 7 Statement of reasons.
- Appendix 8 Draft Order TRO/21/12
- Appendix 9 Draft Order TRO/22/16
- Appendix 10 Delegated powers report TRO/21/12.

Appendix 1- Proposal for Bell's Mills and Dolphin Gardens West

Bell's Mills



Dolphin Gardens West



NOTES

24 HOUR WAITING RESTRICTIONS

•EDINBURGH•
 THE CITY OF EDINBURGH COUNCIL
 Services for Communities
 4 East Market Street, Edinburgh EH8 9JN
 Tel: 0131 226 2000

DOLPHIN GARDENS WEST
PROPOSED 24 HOUR WAITING RESTRICTIONS

1:500
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Appendix 2 – A schedule of the main issues raised through objections received against Traffic Regulation Order TRO/22/16 (Bell’s Mills)

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 3
Access issues	Even with no parking bays, the road is difficult: As well as a sharp steeped bend at the very top of the road (turning into Bell's Mills from Belford Road), the road bends again, fairly sharply - with the entrance to the hotel car park on one side and a driveway a little further on the other. There are often coaches parked at the top on Belford Road outside the hotel fire exit, making it difficult to see oncoming traffic when turning in & out of the road.	9	Proposal revised to provide shared use parking where the carriageway is wider, with the proposed bays removed from the vicinity of the right-angled bend.	Proposal was revised	1,2,3,4,5,6,7,8,9
Hotel parking.	The hotel does not advertise that it does not have enough spaces for all guests. Long experience has shown that when the parking bays are introduced, they end up being used as overflow hotel spaces and taxi parking and are therefore unlikely to benefit permanent residents who will be permit holders	7	Proposal revised to provide shared use parking where the carriageway is wider, with the proposed bays removed from the vicinity of the right-angled bend.	No action required	2,3,4,5,7,8,9

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 3
Emergency services and Waste access	Bell's Mills provides the only access to the 24 flats at the bottom of the hill. As such it must be suitable for emergency vehicles, bin lorries etc. It is interesting that there is a notice at the top stating that it is not suitable for long vehicles. I can personally agree with that, as when previously parking was allowed, I was driving out and met the bin lorry in the top half. I had to reverse right into the corner (as instructed by the driver of the bin lorry) to avoid its back hitting my car as it turned the corner. Using the road has been much safer since parking was discontinued.	9	No complaints or issues raised from Emergency services or Waste Services with regard to vehicle access at this location.	No action required	1,2,3,4,5,6,7,8,9
Footway parking	This road is also a route to the Water of Leith and used by many hotel and non-hotel pedestrians, especially dog walkers, children and cyclists. Large groups of hotel guests walk up the road to the coaches parked at the top of the hill. There is only a pedestrian walkway on one side. It is not uncommon to find, at peak hotel times, that hotel traffic parks on the walkway and it is inaccessible. This forces pedestrians onto the road and creates a safety issue. Prior to the painting of the double yellow lines.	1	Pavement parking is now illegal and will be stopped with regular parking attendant visits, this can also be reported using the council website.	Parking attendant visits	2

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 3
Revise parking proposal	While I suspect that creating three 16m parking bays would see a return to the original problems, I wonder if this could be avoided by having smaller parking bays, such as 8m each, which would ensure there is space for cars and vans to maneuver and create 'passing places' to facilitate two way traffic. I would also enquire whether there were physical solutions to deter parking on double yellow lines (such as heavy planters used in the city) rather than the issue of tickets which is proving ineffective.	1	Parking proposal has been revised to increase passing places.	No action required	5
Weather Emergency	Bells Mills residents is that the access road has a very high gradient (1 in 4 in places) and a blind right-angled corner, leading to major issues from residents and hotel access during ice and snow conditions. The addition of parking in the vicinity of slippery hill conditions provides an additional unwanted and potentially dangerous complication which has proved difficult in the past.	2	There is a grit bin that has been installed by the council at the top of the hill for local use. Also, residents can request extra gritting visits during weather emergency by contacting the council customer care line. 0131 200 2000	None. Grit bins are provided, and parking proposals enable safe passing and manoeuvring.	5,9
Anti-social behaviour	Anti-social behaviour. In 2021, there were frequent occurrences of anti-social behaviour of car users who were parked legally and illegally on this road. Numerous instances of loud music, alcohol consumption, and open use of recreational drugs were seen in the evenings. Several female residents of Bell's Mills were verbally harassed by these intoxicated individuals when going	2	The proposal has been revised to reduce the number of parking bays at the hotel. Anti-social behaviour can be reported to the police using the non-emergency number 101.	No action required	5,9

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 3
	<p>to and from their own homes. Most of these individuals appeared to be short-term hotel guests. The situation of the road is that it is not visible from the busy Belford Road and these individuals could operate with little chance of detection from law enforcement. This anti-social behaviour has completely ceased since the introduction of the full set of double yellow lines in late 2021. The planned parking spaces allow an opportunity for this type of behaviour to return.</p>				
Unused parking	<p>Nearby Underused Parking: I regularly walk along the section of Belford Road which goes from the Belford Bridge to the Dean Bridge and have always noticed that many of the parking spaces are unused. This is not a through road to vehicles as it is closed off at the Dean Bridge. I counted the unused spaces, yesterday and last Friday; On both occasions there were 20+ unused in the sections labelled 'Permit Holders and Pay and Display customers'. I note also that there were many spaces in the Permit Holders only category. WHY do you propose to squash 6 bays into a small place like Bell's Mills with all its disadvantages when there are many unused spaces just along the road in a more accessible safer environment?</p>	1	<p>The proposal has been revised to reduce the bays in Bell's Mills. But the records of permits in the local area show that there are more permits than there are parking bays.</p>	No action required	1

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 3
Alternative parking	Alternative parking is available not far away	2	Although there is other areas to park in the N5 zone records show that there are more permits than parking bays.	No action required	7

Appendix 3 – Consultation Data TRO/22/16 (Bell’s Mills)

Number	Objection
(1)	<p>Having reviewed the plans and application I enter the following observations/ objections / suggestions. I note the availability of parking bays in Douglas Gardens are usually free at all times and within easy walking distance on the level with the Hotel and the Flats provided with parking bays on private ground for residents in the Bells Mills area. The parking bays as planned on Bells Mills road seem specious as the road is not to scale. By creating the spaces you will have a single track road with few passing places on a steep hill with poor line of sight. The bays will create a single lane for traffic with a right-angle bend halfway down. Vehicles regularly travel down (at inappropriate speed) and will meet, one coming up on the same side (particularly at the corner) leading to much reversing particularly when the access is used by refuse trucks and service vehicles. The length of the bays should be reduced significantly and preferably removed completely on the upper section where visibility is very poor. This is a busy section of road with poor visibility and room for manoeuvre. Many vehicles (some hired by visitors unused to our traffic) and taxis access the flats and main entrance to the adjacent Hotel (which is down at the bottom of the Hill not as originally planned when built). Pedestrians are often on the road from the hotel and accessing the water of Leith with the pavement too narrow at the corner for people to pass without stepping onto the roadway which you are planning to narrow. A "trial" of what is planned has been done over a number of years (by default) which resulted in multiple complaints, problems with enforcement, access issues for emergency vehicles and council trucks, as well as safety issues. Parked vehicles were often left for days or weeks without moving (at no cost) suggesting that most are used by residents rather than visitors. There is usually free parking on Douglas Gardens for residents as mentioned above. There may be a case for two or three bays lower down however the planned bays on the hill recreate the significant hazards to access and life which have been complained about before.</p>
(2)	<p>I write to raise concerns regarding the Traffic Order Proposals for Bells Mills. I live in the development at the bottom of Bells Mill. This street has had significant difficulties due to parking on that stretch of road. A number of months ago double yellow lines were painted which significantly improved the problem. The proposals set out look to reverse the improvements that were made. This road is a steep hill with a blind 90-degree bend with limited visibility. It sees significant bursts of traffic owing to the location of the Britannia hotel at the bottom of the hill. Traffic is particularly bad in the late evenings, early morning and over busy weekends. The hotel has insufficient parking for the number of guests and the area can become congested quite easily. It also attracts frequent taxis and other vehicles picking up and dropping off customers. The hotel receives numerous</p>

deliveries and also has many trade customers. This means there are heavy vehicles, large vans and trucks moving up and down the narrow hill. Recently coaches, which have normally parked at the top of the hill, have been parking at the bottom of the hill. It is not uncommon to find multiple cars and vans parked on the double yellow lines. While the road can frequently be quiet during the day it can be very busy at peak times for the hotel. The road is also effectively a 'dead end' and all traffic that travels down the hill must turn and go back up to exit. This is especially a problem when the hotel car park is full as the vehicles that can't find a space then travel back up the hill and meet the que of vehicles looking for a space. A two-way flow of traffic is essential. For a long period of time the double yellow lines had not been painted as designed and were only recently repainted correctly. Prior to the correction cars would park in the same places as the parking bays that are being proposed. This effectively narrowed the road to single file traffic and created significant access problems, including for emergency services should they be required. It became a challenge for larger vehicles such as refuse collection and delivery vehicles at both our development and the hotel. Cars and vans meeting each other going up and down the road have to reverse around a blind 90-degree bend with poor visibility to allow traffic flow. This problem was compounded by hotel customers parking on the double yellow lines. While I appreciate that you are not condoning vehicles parking on the double yellow lines, I would hope that you appreciate that this is the reality. The hotel traffic is largely overnight and occurs when there are fewer parking attendants who visit less frequently, as such illegal parking is frequently unenforced. As the customers do not reside in Edinburgh and do not return to the area frequently the parking tickets are less of a deterrent. This road is also a route to the Water of Leith and used by many hotel and non-hotel pedestrians, especially dog walkers, children and cyclists. Large groups of hotel guests walk up the road to the coaches parked at the top of the hill. There is only a pedestrian walkway on one side. It is not uncommon to find, at peak hotel times, that hotel traffic parks on the walkway and it is inaccessible. This forces pedestrians onto the road and creates a safety issue. Prior to the painting of the double yellow lines I have seen a number of near misses where cars navigating congestion caused by the parked cars have almost collided with pedestrians forced on to the road. Many of the issues I describe were solved by the painting of the double yellow lines. Ensuring the road would allow two-way traffic reduced the access issues, there was more space for cars to turn and more space for pedestrians. The proposals appear to allow space for parking of between 12 and 16 cars and my concern is that this will see a return to the issues from before the painting of the double yellow lines. I appreciate that painting the double yellow lines as they were originally planned has reduced the parking capacity in the area. While I suspect that creating three 16m parking bays would see a return to the original problems, I wonder if this could be avoided by having smaller parking bays, such as 8m each, which would ensure there is space for cars and vans to maneuver and create 'passing places' to facilitate two-way traffic. I would also enquire whether there were physical solutions to deter parking on double yellow lines (such as heavy planters used in the city) rather than the issue of tickets which is proving ineffective.

(3)	<p>I have lived at Bell's Mills for 8 years and in that time, until recently, there has been a mixture of double yellow lines and open parking spaces. This caused a lot of traffic congestion on this narrow and windy access road. The situation was compounded by Britannia hotel staff and residents parking illegally on the restricted areas of the road. The Bell's Mills flat owners asked the council to address this situation and they agreed to put double yellow lines down the whole length of the road on both sides. This happened in 2022. These lines should have been in place all along according to the original traffic order for the road. This is a particularly narrow road with a tight bend which is heavily used due to the Britannia hotel reception access. The proposed parking bays will put us back in the same position we were in a year ago when we first contacted the council for help. It seems that hotel guests see cars parked in bays and feel it is therefore fine to park on double yellow lines alongside them. This leads to the road becoming impassible and risks emergency services etc being unable to gain access if required. You will be able to review historic parking penalty notices to see how bad the situation has been in the past. Even without any illegal parking, the proposed new spaces make using the road difficult. If a large van parks in one of them then access becomes very difficult, particularly on the tight bend part of the road at the top. The proposed spaces outside Bell's Mills house also cause issues when deliveries, taxis and hotel guests etc park in the area outside the hotel reception right opposite the parking bays - access to and from my flats then becomes extremely difficult. Your proposal, exasperated by the many buses parking at the top of the road for the hotel and the volume of taxis dropping off guests will see a return of the problems we have seen over the years and tried so hard and for so long to resolve. Personally, I have previously faced difficulty driving my small car to and from my property and do not want this situation to return. I attach some pictures of how parking restrictions were abused and ignored before we got the full double lines painted. The situation is much improved now due to the full lines being in place, but my concern is that by putting in the proposed parking bays things will go back to the way they were. It is dangerous to have so many vehicles on such a small road. Please do not let this situation return - it will only be matter of time before there is an accident or emergency vehicle access is blocked.</p>
(4)	<p>As a resident of Bells Mills, I would like to bring your attention of the dangers regarding adding parking bays on Bells Mills and outside the Britttania Hotel. When the parking bays were there previously, drivers often left their vehicles there for days on end, including on the corner of Bells Brae and also outside our gates, (blocking our ability to exit safely and emergency vehicles from entering), also forcing many of us residents to reverse back down the hill for vans, lorries, coaches and waste refusal vehicles to pass safely. This was an even bigger hazard during inclement weather for drivers and pedestrians alike trying to pass safely on the pavement on the brow of Bells Mills. A small, magnified mirror on that same corner doesn't really resolve this issue either. Much of the road is narrow as it is and most Britttania Hotel guests and delivery vehicles (including taxis) block the road as it is now without any parking bays. Double yellow lines don't deter vehicles parking there daily illegally either (see the multitude of illegally parked vehicles reported to the Council over the last few weeks as evidence, where rarely does anyone issue tickets in the evenings and it's too late first thing in the morning when everyone's left).I understand one or</p>

	<p>two parking bays might be required by residents, but even those will encourage existing offenders to park there, and so on the above points I therefore object to any bays being added to Bells Mills road.</p>
(5)	<p>I am surprised and disappointed to see the draft proposal for parking spaces in the access road at Bell's Mills. This road has long been the subject of massive parking issues for residents in terms of access for residents, and for delivery and emergency vehicles over the last ten years. Until late 2021, there were no double yellow lines in the spaces marked for new parking spaces in TRO/22/16 which directly led to a series of problems with hotel residents and others parking nearby on double yellow lines, severely inhibiting access and causing other issues. Many of the illegally parked vehicles were driven by hotel guests who are unfamiliar with the area. The extent of this problem is evidenced by a large number of complaints sent to local councillors (primarily Max Mitchell), and by the exceptionally high number of parking tickets issued in this small area. Illegal Parking In 2021, double yellow lines were installed over the entire length of Bell's Mills, as detailed in the previous TRO that covered this area. Since then, the amount of illegal parking has reduced considerably, leading to better access for residents, and also for hotel guests, delivery vehicles and – critically - emergency vehicles. It is a very real fear that the installation of parking bays detailed in TRO/22/16 will directly encourage extensive illegal parking, as happened prior to 2021. Poor weather access Another routine problem for Bells Mills residents is that the access road has a very high gradient (1 in 4 in places) Bells Mills residents is that right-angled corner, leading to major issues from residents and hotel access during ice and snow conditions. The addition of parking in the vicinity of slippery hill conditions provides an additional unwanted and potentially dangerous complication which has proved difficult in the past. and a blind right-angled corner, leading to major issues from residents and hotel access during ice and snow conditions. The addition of parking in the vicinity of slippery hill conditions provides an additional unwanted and potentially dangerous complication which has proved difficult in the past. Note that this road is not a priority for gritting in poor conditions. Anti-social behaviour n 2021, there were frequent occurrences of anti-social behaviour of car users who were parked legally and illegally on this road. Numerous instances of loud music, alcohol consumption, and open use of recreational drugs were seen in the evenings. Several female residents of Bell's Mills were verbally harassed by these intoxicated individuals when going to and from their own homes. Most of these individuals appeared to be short-term hotel guests. The situation of the road is that it is not visible from the busy Belford Road and these individuals could operate with little chance of detection from law enforcement. This anti-social behaviour has completely ceased since the introduction of the full set of double yellow lines in late 2021. The planned parking spaces allow an opportunity for this type of behaviour to return. Summary propose that no new parking bays are installed for all these reasons and that this plan is fully re-considered. There are ample unused parking spaces in nearby Douglas Gardens, where many of the particular Bells Mills issues cannot happen. If this is not possible, I can only strongly urge the planning authority not to place parking bays in the vicinity of the dangerous blind right-angled corner as a compromise (especially on the leg between the right-angled corner and Belford Road). This is where the gradient and parking will cause the most acute issue. I must applaud Councillor Max Mitchell for his help in dealing with the Bell's Mills parking matter. However, when he initially</p>

	<p>proposed parking bays for the site, my understanding was that he referred only to a few (two) parking spaces only in the lower part of the road, and not to the huge extent proposed in this plan. I believe the current plan will take us back to the unacceptable situation seen pre-2021 and I must strongly object.</p>
(6)	<p>I am aware of plans to re-allow parking at this location. This is despite parking having recently been banned because of historical congestion. I object to this on safety grounds. This is a narrow road, and access to emergency vehicles – in particular fire appliances - could be hampered by re-allowing parking. I respectfully request the matter is reconsidered.</p>
(7)	<p>I, as a resident in the Bell's Mills development, strongly object to the proposal to install parking bays in Bell's Mills. I can only assume that the people who made this proposal are not familiar with the area. On a map Bell's Mills would appear to be a little quiet cul de sac. It is anything but!!!</p> <p>Reasons for Objection</p> <ol style="list-style-type: none"> 1. Geography: Bell's Mills goes down from Belford Road to the level of The Water of Leith. It is short and therefore steep with a gradient of 1:4 in parts. It is narrow, has a right-angle bend and has a footpath down one side, with a blind corner. it does not have a line painted down the middle of the road presumably because it is narrow. 2. Bell's Mills Development: Bell's Mills provides the only access to the 24 flats at the bottom of the hill. As such it must be suitable for emergency vehicles, bin lorries etc. It is interesting that there is a notice at the top stating that it is not suitable for long vehicles. I can personally agree with that, as when previously parking was allowed, I was driving out and met the bin lorry in the top half. I had to reverse right into the corner (as instructed by the driver of the bin lorry) to avoid its back hitting my car as it turned the corner. Using the road has been much safer since parking was discontinued. 3. Britannia Hotel: Bell's Mills provides the only access to the Britannia hotel. The hotel reception is at the bottom of the hill so guests must either drive down or walk down the hill. The people who walk down usually arrive in coaches. For obvious reasons the coaches park at the top. The hotel is advertised as having 223 bedrooms. So, every day, many hotel guests walk up and down the hill, often pulling suitcases. When parties meet, one must move off the pavement onto the road, sometimes at the blind corner. Taxis also use the road frequently. 4. Nearby Underused Parking: I regularly walk along the section of Belford Road which goes from the Belford Bridge to the Dean Bridge and have always noticed that many of the parking spaces are unused. This is not a through road to vehicles as it is closed off at the Dean Bridge. I counted the unused spaces, yesterday and last Friday; On both occasions there were 20+ unused in the sections labelled 'Permit Holders and Pay and Display customers'. I note also that there were many spaces in the Permit Holders only category. WHY do you propose to squash 6 bays into a small place like Bell's Mills with all its disadvantages when there are many unused spaces just along the road in a more accessible safer environment? It does not make sense. I consider it to be dangerous and a waste of money and ask you not to proceed with this proposal.

(8)	<p>I am writing to note some concerns around the proposed parking along Bell's Mills. Even with no parking, the road is difficult: As well as a sharp steeped bend at the very top of the road (turning into Bell's Mills from Belford Road), the road bends again, fairly sharply - with the entrance to the hotel car park on one side and a driveway a little further on the other. There are often buses parked at the top, outside the hotel fire exit, making it difficult to see when turning in & out of the road. The road is very busy. As well as daily bin lorries (three different schedules), there are a number of lorries that service the hotel frequently - catering, laundry etc., as well as taxis and delivery vans. As such there is high traffic at all times of the day, including weekends, and during all seasons. There is no pedestrian path for part of the street. Walking down from Belford Road to Bell's mills, there is a path on the left-hand side, which then disappears at the hotel car park entrance - only reappearing towards the water of Leith. Parked cars would make this a more dangerous place for pedestrians - a lot of which pass through the street to/ from the river. Having parking along the road would effectively make it a single-track road. Given the high volume (and size) of vehicles, and the difficulty reversing due to the bends & close proximity to the junction with Belford Road, this is not safe. Before the double yellows were in place, we experienced a number of occasions where cars parked over our driveway and outside the outward opening gate, blocking access each time. Access from both are required at all times. While there is an indication of size on the plans, it is not clear from the order where the parking bay would start & end. Before the double yellows were in place, we also experienced antisocial behavior from hotel guests parking outside the house - sitting in cars playing music late at night, taking drugs and throwing rubbish through the hedge and onto the street. Creating pay & display bays would take us back to this being a problem. Fundamentally, the road is not designed for the use it already receives - and the parking proposed would only add to the dangers caused by congestion & access issues.</p>
(9)	<p>I am writing as Secretary for the Bells Mills Owners Association in response to your proposal for shared-use parking bays on Bells Mills. I represent the owners and residents of the development at the foot of Bells Mills (i.e. the 24 properties in No.s 2-5 Bells Mills). I know that a number of residents from the development have already written to you. More still have made their views clear to me. I have to say that we are all, unanimously, opposed to the proposal. Bells Mills is a narrow road on a steep hill with a 90-degree bend with limited visibility. The road space that would be lost to the new parking bays is similar, in location and extents, to the sections that were available for free parking prior to the extension of No Parking controls in late 2021. Back when parking was allowed, we witnessed repeated and sometimes serious access issues on Bells Mills, including, on one occasion, the obstruction of an emergency services vehicle. Your proposal would once again narrow the road so that effectively it becomes a single-track road with passing places. We know from long experience that this, combined with the traffic levels and/or illegal parking that we have come to expect (mainly associated with visitors to/servicing of the Britannia Hotel) would once again lead to serious access problems. Bells Mills can often be quiet during the day, especially during less busy periods for the hotel, but it sees much heavier traffic at other times and when the hotel is busier. The hotel entrance located at the bottom of the hill attracts increased traffic in the evenings and early mornings, and during busy weekends and holidays. The hotel attracts frequent taxis and other vehicles picking customers up and dropping them off. The road also carries numerous delivery, trade and service vehicles. This means there are heavy vehicles, large vans and trucks</p>

	<p>moving up and down the narrow, steep hill and round the bend. Recently coaches, which normally park at the top of the hill, have been parking at the bottom. It is also not uncommon to find multiple such vehicles parked on the double yellow lines thereby further reducing the road width. On its website the hotel states that it has over 200 rooms. It also advertises parking for guests - but without making clear that the parking availability is extremely limited compared with hotel capacity. As a result, the area can become congested quite easily with guests seeking somewhere to park, and often failing to find it. This also results in illegal parking, which again narrows the road further and has contributed to the access issues. In our experience the council's parking enforcement team does a good job and has been very responsive to reports of parking issues. However, enforcement isn't likely to solve the illegal parking problem. Many hotel guests aren't familiar with the area, and the transitory nature of their custom reduces the effectiveness of enforcement as a deterrent. Moreover, parking enforcement officers aren't always available when most needed (evenings, early mornings etc). Historically, there have also been instances of antisocial behaviour associated with hotel guests drinking in their parked vehicles on Bells Mills and/or playing music loudly. I understand that the residents of Bells Mills House have also suffered from this issue. This situation has improved since the parking controls were extended, but we are concerned that such nuisances will recommence if parking is reinstated for general use. For all of the above reasons we would strongly recommend that parking in the carriageway remains restricted as at present. Alternative parking is available not far away on Douglas Gardens, and on Belford Road east of the bridge, and these spaces are rarely if ever all filled. If the traffic authority considers however that it must implement some new parking on Bells Mills, we would urge the authority to reconsider the proposals in light of our objections: and therefore, reduce the extent of the proposed bays significantly, keep them well clear of the sharp bend (preferably avoiding the upper section altogether for reasons of visibility), and restrict their use to Residents Only.</p>
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Appendix 4 Revised proposals Bell's Mills



Appendix 5 – A schedule of the main issues raised through objections received against Traffic Regulation Order TRO/21/12 (Dolphin Gardens West)

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
Affect residents / older residents / families	I am very concerned at the impact this notice will have given that we are in our seventies this is going to cause quite a few problems for us as our mobility is not what it used to be. This is so unfair on young families too being unable to park at their house and having a distance to walk with young children. As I have lived here for 40 years without any problem and no damage to any vehicle parked outside my house, I can't see the reasoning behind this.	8	Blue Badge holders can park free of charge and without time limit on.	No action required	1,2,3,4,5,6,7,8
Busy local parking already	I am very concerned at the impact this notice will have given that we are in our seventies this is going to cause quite a few problems for us as our mobility is not what it used to be. This is so unfair on young families too being unable to park at their house and having a distance to walk with young children. As I have lived here for 40 years without any problem and no damage to any vehicle parked outside my house, I can't see the reasoning behind this.	8	Blue Badge holders can park free of charge and without time limit on yellow lines as long as they are not causing an obstruction to vehicle flow at that location. There will still be uncontrolled parking areas in the street and as most properties have driveways there will still be parking opportunities.	No action required	1,2,3,4,5,6,7,8

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
Funds for this project could be used for other road maintenance projects	Strongly believe the money spent on planning, implementing and maintaining the proposed work could be used for much more important issues, such as repairing the many potholes in the area.	3	Council maintenance budgets are used for road maintenance, parking budgets would not be used for pothole repairs.	No action required	3,4,7
Not aware of waste / delivery access issue	The street which is a crescent only used by residents of the street itself has never had to my knowledge any problems with deliveries, bin collecting or otherwise.	3	Damage to grass areas is evidence of vehicles mounting the kerb to manoeuvre.	No action required	1,2,6
This will increase speeding on the corner	The inner island is a playpark with children playing and constantly crossing the street, this proposal will make it easier for people to speed in this corner. If cars are parked people tend to drive with caution. I argue that the instalment of these waiting restrictions will cause cars to approach the corner at an increased speed than at present rendering it more dangerous for local children and perhaps ironically to the grass itself.	2	A 20mph speed limit is in place at this location. The proposal reduces the risk of large vehicles mounting the kerb and running over the grass area.	No action required	6,8

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
Statement of reasons	Your statement of reason seems to apply to the other streets included in this traffic order, but our street which is a crescent only used by residents of the street itself has never had to my knowledge any problems with emergency vehicles, deliveries, bin collecting or otherwise. The restrictions suggested in the inner corner of the crescent would not in any way, 'secure the expeditious, convenient and safe movement of vehicular and other traffic. 'Indeed, these inner corners are larger than the entry and exit of the above-mentioned crescent so no vehicle that can't currently fit in the street would fit in the event these restrictions are implemented.	1	Waste Services support this proposal due to their large goods vehicles mounting the kerb and running over grass areas. A request was made to Waste Services exploring the use of smaller vehicles to uplift waste bins at this location, however, this was not operationally feasible.	No action required	8
Property value	Our house is the biggest investment we have made, and the no parking options will affect the value of our property.	2	There will still be parking opportunities in the street as there will only be two sections of yellow line restrictions and these are installed where there are properties with driveways.	No action required	1,8

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
Car washing	Part of retirement for me is enjoying washing and looking after my car. Mentally this will influence me particularly during the spring and summer not being able to do this outside my house.	1	The yellow line restrictions are to be placed on bends and across from properties with driveways. There are other unrestricted parking opportunities on the street.	No action required	1
Community	We have a good community spirit in the crescent each one respecting car parking spaces this could change and cause problems for people on the bottom road.	1	Yellow line restrictions are to be placed on bends and across from properties with driveways. There are other unrestricted parking opportunities on the street.	No action required	1
School drop-off	This would also be particularly troublesome within school hours as the drop-off traffic is already bad in the surrounding area.	1	This proposal should make the location safer, stopping potential school drop off parking on corners of the street.	No action required	3

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
Vulnerable resident	On a personal note, I am a single parent and I have a disabled son who has epilepsy, autism and as of this moment in time, undiagnosed ADHD. He is 8 years old and has very little road sense. If the council are to put these yellow lines in, I, like everyone else will be fighting for a space near my house. Whilst my son gets mobility as part of his DLA it is at the low rate and therefore, we are not entitled to a blue badge. Putting the yellow lines in will be a risk to my son if we have to park a distance from our house. I believe this makes him extremely vulnerable.	1	The yellow line restrictions are to be placed on bends and across from properties with driveways. There are other unrestricted parking opportunities on the street.	No action required	5
Visitor parking	The proposal would I believe be 'anti-social' not just to my household, but also my neighbours and all potential visitors of all kinds that wish or need to come to the area. It will undoubtedly cause social friction and tension for the future as further pressure is put on a finite parking resource	1	The yellow line restrictions are to be placed on bends and across from properties with driveways. There are other unrestricted parking opportunities on the street.	No action required	6
Protecting the edge of grass	However, I personally do not see protecting the edge of grass as a relevant reason to force local senior residents and families with infants to walk long distances to reach their homes and negatively impact their daily lives. I also find absolutely shocking to allow one resident to make this decision for all, I hope you realise that these restrictions start right after this same resident's house which is located on number 15. His section of the road is right on the bend, and I would like to	1	The proposal has been inspected and confirmed that with the yellow lines will stop large vehicles mounting the kerb causing a danger to the public. No member of the public has been involved in the decision to install the yellow lines or influenced the location.	No action required	8

Issue	Objections	Number of Objections	Response	Action	Related Objection Number(s) in Appendix 6
	<p>know exactly on what ground he has decided to keep the parking spot right in front of his own house and request double yellow lines only starting from his neighbours' houses. This alone is totally unacceptable, leaving one man ruling the neighbourhood while remaining exempt of his own 'rule' despite being on the exact spot of the so-called problematic corner. I attach a photo and I would like a real justification of why the section of the road in front of number 15 should not have restrictions but number 27 that is further away from the bend should.</p>		<p>The two proposed locations in the street are associated with assisting the safe movement of large vehicles.</p>		
Consultation	<p>It is my understanding that no consultation with local residents or representatives has been held, this would have been common sense before poorly advertising this proposal in locations barely visible.</p>	1	<p>The consultation for this TRO went through two phases and this objection came through the second 'public' consultation phase, which was advertised in the local press, and on the council website, in addition street notices were posted in the street.</p>	No action required	6
Drop Kerbs	<p>All the people involved here have all got illegal drop kerbs at their driveways so I think it would be advisable to look into this matter before even thinking about yellow lines or it could be a costly inquiry.</p>	1	<p>Permits for drop kerbs are dealt with by our permit section and the location would be subject to investigation by the relevant team.</p>	Report resident driveway issue to Road Works Co-ordination Team.	7

Appendix 6 – Consultation Data TRO/21/12 (Dolphin Gardens West)

Number	Objection
(1)	<p>I am writing to object to traffic order reference TRO/21/12. Your statement of reason seems to apply to the other streets included in this traffic order, but our street which is a crescent only used by residents of the street itself has never had to my knowledge any problems with emergency vehicles, deliveries, bin collecting or otherwise. The restrictions suggested in the inner corner of the crescent would not in any way, 'secure the expeditious, convenient and safe movement of vehicular and other traffic. 'Indeed, these inner corners are larger than the entry and exit of the above-mentioned crescent so no vehicle that can't currently fit in the street would fit in the event these restrictions are implemented. I am very concerned at the impact this notice will have given that we are in our seventies this is going to cause quite a few problems for us as our mobility is not what it used to be. This is so unfair on young families too being unable to park at their house and having a distance to walk with young children. As I have lived here for 40 years without any problem and no damage to any vehicle parked outside my house, I can't see the reasoning behind this. Our house is the biggest investment we have made, and the no parking options will affect the value of our property. Part of retirement for me is enjoying washing and looking after my car mentally this will influence me particularly during the spring and summer not being able to do this outside my house. We have a good community spirit in the crescent each one respecting car parking spaces this could change and cause problems for people on the bottom road. We the local residents of the street who are the ones using the crescent daily would be greatly impacted by these restrictions. Parking is scarce in the area and not everyone can afford in the current economic conditions to destroy their front garden in a very unecological way, in order to park their car. These new restrictions would benefit nobody we would need to park over 20-minute walk away as every other resident currently parks in front of their own house leaving no other option for us. Parking at night in badly lit streets would make you feel unsafe as you may have to park a couple of streets away.</p>
(2)	<p>I have lived in this street for 16 years with no parking issues. most of the neighbours are respectful when it comes to parking. This will I'm sure have a knock-on effect to us all. It seems that this will affect me my neighbour. And 1 car along the road. I do 10 hours split shifts. so think this is unfair as I try to find parking twice daily. my neighbour as 2 babies. she can't drop them off home. then go looking for a parking place somewhere in the neighbourhood. The other car involved are two retired pensioners. We have no issues with bin lorries. Also Amazon, Tesco, Asda, are regular daily visitors in this street .in all the years I have stayed here not one person has ever complained about any damage to their vehicles. I feel as I'm being targeted</p>

	for 2 damaged patches of grass in the park. That lorry's drive over.I rent this property retire in 2 months .so can least afford a drive way .this is a peaceful street to live in please don't make it stressful to go about our daily life's.
(3)	I am writing to object to the proposed double yellow lines on Dolphin Gardens West. These double yellows would cause more cars to be parked on the opposite side of the park, therefore making the area more congested than it already is. This would also be particularly troublesome within school hours as the drop-off traffic is already bad in the surrounding area. The cars parked on the street of Dolphin Gardens West cause no issue to passing vans tending to deliveries. I don't understand the proposal of these yellow lines and feel money from the council should be ploughed into better things for the area.
(4)	I am writing to object to the new proposed road markings in Dolphin Gardens West under TR/21/12. This is a residential street that requires parking for homeowners and if the prosed was to go ahead it would create inconvenience for everyone living on the street as parking would be greatly limited, when it is already an issue. I am failing to understand what the benefit of the new road markings would be and feel they have been put in with the little thought for the residents impacted. I believe it would cause more disruption in the area, and strongly believe the money spent on planning, implementing and maintaining the proposed work could be used for much more important issues, such as repairing the many potholes in the area. I would be interested to hear more about these plans and the impact of this objection, so a response would be appreciated
(5)	I write to object to the above City of Edinburgh Council proposal. I live on Dolphin Gardens West. This part of Dolphin Gardens West is up round the top stretch of park. The proposed parking restrictions are going to take over more than half of this part of our street. While the yellow lines are not going to be outside my house, there are going to be at least 8 cars that will not be able to park outside their house as they do now On a personal note, I am a single parent and I have a disabled son who has epilepsy, autism and as of this moment in time, undiagnosed ADHD. He is 8 years old and has very little road sense. If the council are to put these yellow lines in, I, like everyone else will be fighting for a space near my house. Whilst my son gets mobility as part of his DLA it is at the low rate and therefore, we are not entitled to a blue badge. Putting the yellow lines in will be a risk to my son if we have to park a distance from our house. I believe this makes him extremely vulnerable. I am not aware of the justification for these yellow lines, especially coming so far up our street. This section of Dolphin Gardens West is family's and elderly and every single one of us will be affected by these yellow lines not to mention the impact it will have on our neighbours at the lower part of Dolphin Gardens West. I and many others, ask that you to reconsider your proposal to these parking restrictions.
(6)	I would like to object to proposed TRO/21/12. I would like to point out we currently have no issue with waste collection as well as any other large vehicle fitting through the street, buildings are only located on one side of the road, the other side being a very large open park. Many of the residents have lived on the estate for decades and cannot understand why it is felt necessary to introduce these new restrictions. Especially as no accidents on this street have been reported and emergency services can easily fit. It appears the request may have been sent in an attempt to insure inconsiderate drivers, mostly

delivery vans (and not waste services that I have observed all week driving by without merely touching the edges of the grass), do not inadvertently drive over the edges of the grass of the park. This has already been sorted by the addition of pebbles in all 4 corners. As it turns out the park has also been covered with traffic cones everywhere, but none in the bends funnily enough. This shows that this occurs all around the street and is rather the result of inconsiderate driving which will only occur more frequently if traffic is allowed to go faster by removing parked cars. However, I personally do not see protecting the edge of grass as a relevant reason to force local senior residents and families with infants to walk long distances to reach their homes and negatively impact their daily lives. I also find absolutely shocking to allow one resident to make this decision for all, I hope you realise that these restrictions start right after this same resident's house which is located on number 15. His section of the road is right on the bend, and I would like to know exactly on what ground he has decided to keep the parking spot right in front of his own house and request double yellow lines only starting from his neighbours' houses. This alone is totally unacceptable, leaving one man ruling the neighbourhood while remaining exempt of his own 'rule' despite being on the exact spot of the so-called problematic corner. I attach a photo and I would like a real justification of why the section of the road in front of number 15 should not have restrictions but number 27 that is further away from the bend should. I understand it is the duty of the City Council to serve its residents and not penalise them for a restriction that will not improve traffic flow in the street. Waste Services currently do fit and they do not drive on the grass, so do emergency vehicles, any exceptionally large vehicle would merely touch the grass on the edges of the park and this certainly does not justify negatively impacting elderly residents and families, as surely one's love of grass must have its limits. The support of Conservative Councillor Webber is baffling, has she investigated the matter prior to granting her support or spoken to other residents, according to all residents of Dolphin Gardens West it seems not. According to your communication with Councillor Jenkinson she suggested first to ask residents to park elsewhere on bin collection day, this ridiculous suggestion was obviously never actually observed. In addition, the introduction of these restrictions will force the residents of Dolphin Gardens West to seek parking elsewhere in the area, where parking is already a challenge. The parking issue will effectively be 'pushed' into adjacent areas that do not have the necessary spaces. Any trades people or visitors to surrounding houses will need to park on the extremely narrow and busy Dolphin Gardens East and Pentland Avenue instead of using the safer option of Dolphin Gardens West. These streets already see a lot of traffic due to local schools' drop-offs and restricting parking in our street as proposed will make the situation much worse in this area. I also believe speed of cars will increase as a consequence of 'clearing' the area due to the restrictions, with potential safety implications to local residents. If parking is prevented, it will increase vehicles speeding. The proposal would I believe be 'anti-social' not just to my household, but also my neighbours and all potential visitors of all kinds that wish or need to come to the area. It will undoubtedly cause social friction and tension for the future as further pressure is put on a finite parking resource. I do welcome the idea of continuous improvement, but my view is that perhaps residents' taxes should be used to pay for more useful restrictions. The restrictions will create more problems for residents and affect their quality of life. Many residents are elderly, some with disabilities and need to park close to their

	<p>homes. It is my understanding that no consultation with local residents or representatives has been held, this would have been common sense before poorly advertising this proposal in locations barely visible. It seems incredibly undemocratic to have public money spent on the request of one resident alone against the wishes of all. I am hoping you will consider the best interest of the residents when discussing this proposal.</p>
(7)	<p>As a resident off DGW I am totally disgusted by what I am hearing about parking restrictions in my street with a resident who we all know who he is complaining about delivery vans and refuse vehicles going up on grass if you have a look at the drop crossing in this street was done by this individual doing them with no permits for any off them done by himself for a backhand the council takes action for this kind of goings on but nothing done so I wish to decline for accepting these yellow lines everyone is talking about so why if the council are so strapped for money why are you even thinking about this wasting money and time considering with this if these yellow lines are giving the go ahead , I wish to take this action further with a certain gentleman that has done the drop crossing for his own condition of making money I would also like to point out that this is a public park open to any residents not for 1 certain individual that thinks he can go to Sue Webber and get seats plant boxes for this park and takes for his and family use This complaint by 1 of the other people the refuse driver of the vehicle is a friend of the person who thinks he owns the park because he cuts the grass all the people involved here have all got illegal drop kerbs at their driveways so I think it would be advisable to look in to this matter before even thinking about yellow lines or it could be a costly inquiry</p>

(8)

I am writing to object to traffic order reference TRO/21/12. Your statement of reason seems to apply to the other streets included in this traffic order, but our street which is a crescent only used by residents of the street itself has never had to my knowledge any problems with deliveries, bin collecting or otherwise. The restrictions suggested in the inner corners of the crescent would not in any way 'Secure the expeditious, convenient and Safe movement of vehicles and other Traffic'. Indeed, these bends are actually larger than the entry and exit of the above-mentioned crescent so no vehicle that can't currently fit in the street would fit in the event these restrictions are implemented. Most houses in these corners already have driveways with dropped kerbs preventing anyone from parking and the only houses whose residents parking will be taken away by these restrictions do not hinder traffic in any way as they are positioned on both ends of the proposed restrictions and not on the actual bend. On the other hand, we, the local residents of the street who are the ones using the crescent daily would be greatly impacted by these restrictions. Parking is scarce in the area and not everyone can afford in the current economic conditions to replace their front garden with a driveway, in a very unecological way, in order to park their car. It seems incredibly cruel to ask senior residents, some with impaired mobility and families with infants to walk long distances each day to reach their property. Parking has taken place in front of these houses for decades by residents, who had specifically chosen to live on a street that is off a main road and offers the possibility of parking without hindering traffic. The City Mobility Plan Policy is to 'Review, Apply and enforce parking, Waiting and loading restrictions Surely This balance is not met in This proposal. Not to mention the impact this would have on our property value which would now have no parking option whatsoever. A property we would not have bought with a young family had we known we would not be able to park anywhere nearby. Ironically no larger vehicle that those that currently drive through would be able to come in with these new restrictions due to the rest of the street being a lot narrower than these corners. Other than preventing us to park these restrictions seem completely pointless and inefficient. It appears this work order originated from the request of a single resident (who appears to be a retired bin collector and claims to have contacts within the waste department) who has set to stop residents from parking around the street. As ludicrous as it may seem to force local elderly residents to walk up the hill with their shopping bags so that they themselves can enjoy flawless grass, it is surprisingly accurate. If solely the residents located on the corners of the crescent were upset with this TRO there wouldn't be much of an issue. As I am sure you are aware, it is important to note that no one has an automatic right to park on the road outside their own home. So essentially the residents who will lose their usual parking spot will simply park next door and this has obviously been understood by absolutely all the residents of the street. All these residents are now panicking as they wish to keep exclusive access to parking in their part of the road which is now threatened. All but one, the one resident who requested this TRO and who happens to not have included his section of the street in his request as it is starting unsurprisingly right after his house, which shouldn't if it was to stretch equally on both sides of the bend. As per your email to Councillor Jenkinson this same resident seems to be the one to have drawn and decided where these yellow lines would go, which is not very professional or democratic. I would like to point out that I am also unaware of past requests asking residents to park elsewhere during bin collection hours as your team informed Councillor Jenkinson. Is there any official documentation to support the fact this request was sent to residents? I know how much we worship grass in the UK however this seems to be turning into an unreasonable obsession given that the damage is hardly noticeable. Our park is now covered in traffic cones, these have

emerged all around the inner island (but not on the bends ironically) in an attempt to ensure no driving trespasses on the edges of the grass (photo attached). This action alone shows that restricting parking in the bends will have no impact as this so-called issue is clearly occurring all around the park. I'd be interested in finding out who has placed all these traffic cones in front of our properties, the council or the said resident himself? They are, I hope you'll agree, very unsightly. I am also disappointed about the fact that the local residents of the crescent were not consulted prior to this traffic order being advertised despite being the only ones affected. Only two small signs soaked by the rain were posted high up on a lamp post in a corner nobody looks at, consequently a number of impacted residents were unaware of it until I personally knocked on their door. We did not elect one resident to make decisions for us all and we all would like to be consulted when such requests are made. I must also call your attention to the fact the Regulations require consultation with 'such other organisations (if any) representing persons likely to be affected by any provision in the order'. In our case, Manor Estate Housing Association that is the organisation representing the residents located in the section of the street concerned by the Traffic order has not been consulted. In addition, in the current conditions parking as it stands does not present a road safety hazard, indeed the street is only a crescent used by local residents, however the proposal will displace parked vehicles to the adjacent main roads which is more likely to inhibiting visibility and restricts two-way traffic flow. I note nothing is proposed to address the potential issue of the transference of parking to an unsuitable area specifically as we are located very near the high school which sees a lot of passage, adding cars to that area appears unsafe and unreasonable. Lastly and most importantly the inner island is a playpark with children playing and constantly crossing the street, this proposal will make it easier for people to speed in this corner. If cars are parked people tend to drive with caution. I argue that the installment of these waiting restrictions will cause cars to approach the corner at an increased speed than at present rendering it more dangerous for local children and perhaps ironically to the grass itself.

Appendix 7 Statement of reasons

The City of Edinburgh Council (the Council), as Roads Authority for Edinburgh, has a duty under Section 122 of the Road Traffic Regulation Act to “secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians)”. The Council, having considered its duties under the terms of the aforementioned Act, has identified locations or has received requests to provide new restrictions, to amend existing restrictions or, as the case may be, to remove existing restrictions on waiting, loading and unloading.

Restrictions on waiting, loading and unloading have a number of benefits including reducing congestion, enabling access and improving visibility and road safety, with such restrictions directly supporting the [City Mobility Plan](#) policy to ‘Review, apply and enforce parking, waiting and loading restrictions whilst balancing the needs of local businesses and residents and people with mobility difficulties’.

Appendix 8 – Draft order TRO/21/12

THE CITY OF EDINBURGH COUNCIL

THE CITY OF EDINBURGH COUNCIL (TRAFFIC REGULATION; RESTRICTIONS ON WAITING, LOADING AND UNLOADING, STOPPING AND PARKING PLACES) (VARIATION NO _) ORDER 202- - TRO/21/12

The City of Edinburgh Council in exercise of their powers under Sections 1(1), 2(1) to 2(3), 4(2) of, and Part IV of Schedule 9 to, the Road Traffic Regulation Act 1984 as amended (which Act as so amended is hereinafter referred to as "the 1984 Act"), and of all other enabling powers and after consultation with the Chief Constable in accordance with Part III of Schedule 9 to the 1984 Act, hereby make the following Order:

1. This Order may be cited as "The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) (Variation No _) Order 202- " and shall come into operation on the ----- day of ----- Two thousand and twenty- ----- .
2. The restrictions imposed by this Order shall be in addition to and not in derogation of any restriction or requirement imposed by any regulations made under the 1984 Act or by or under any other enactment.
3. In this Order, except where the context otherwise requires, the follow expressions have the meanings hereby respectively assigned to them:

"the 2018 Order" means The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) Designation and Traffic Regulation Order 2018.
4. Designation of parking places and loading places and application of the 2018 Order thereto.
 - a) Each area on a road identified in a map tile as a parking place or loading place and, where applicable, by way of either a map tile label or the map schedule legend, or both, as an area marked out and signed for the use therein of specified classes of vehicles following the conditions specified in the 2018 Order in relation to that type of parking place or loading place, is designated as a parking place or, as the case may be, a loading place.
 - b) Unless otherwise so identified, a parking place or a loading place shall be bounded on one side of its length by the edge of the carriageway and be an area marked either by a traffic sign or by another method of indicating the extent of a parking place or loading place as specified in the Traffic Signs Regulations and General Directions 2016.
 - c) The provisions of the 2018 Order (other than Articles 3-1 and 7-1) shall apply to an area designated as a parking place by this Order as if in those provisions any reference to:

DRAFT

- (i) a parking place included a reference to an area designated as a parking place by this Order, and
- (ii) a loading place included a reference to an area designated as a loading place by this Order.

5. Loading prohibition and/or waiting restrictions applicable in prohibited or restricted roads.

Without prejudice to the validity of anything done or to any liability incurred in respect of any act or omission before the coming into operation of this Order, the 2018 Order shall have effect as though any loading prohibition and/or waiting restriction identified in a map tile and, where applicable, by way of either a map tile label or the map schedule legend, or both, and marked out and signed as a loading prohibition and/or waiting restriction shall be construed as though it were a prohibited road and/or a restricted road referred to in the 2018 Order.

6. Without prejudice to the validity of anything done or to any liability incurred in respect of any act or omission before the coming into operation of this Order, The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) Designation and Traffic Regulation Order 2018, shall have the effect as if, in Schedule 2 to that Order: -

1) the version number listed for the following map tiles will increase by one whole number:

571	630	686	864	1161
1528	1650	1736	1885	1921
2001	2029	2060	2106	2645
2703	2852	2910	2911	

Executed by The City of Edinburgh Council this ----- day of ----- Two thousand and twenty- -----.

(witness) signed on behalf of Executive Director of Place

Appendix 9 – Draft order TRO/22/16

THE CITY OF EDINBURGH COUNCIL

THE CITY OF EDINBURGH COUNCIL (TRAFFIC REGULATION; RESTRICTIONS ON WAITING, LOADING AND UNLOADING, STOPPING AND PARKING PLACES) (VARIATION NO -) ORDER 202_ - TRO/22/16

The City of Edinburgh Council in exercise of their powers under Sections 1(1), 2(1) to 2(3), 4(2), 32, 35, 45, 46, 49 and 53 of, and Part IV of Schedule 9 to, the Road Traffic Regulation Act 1984 as amended (which Act as so amended is hereinafter referred to as "the 1984 Act"), and of all other enabling powers and after consultation with the Chief Constable in accordance with Part III of Schedule 9 to the 1984 Act, hereby make the following Order:

1. This Order may be cited as "The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) (Variation No _) Order 202-" and shall come into operation on the ---- day of ---- Two thousand and ----.
2. The restrictions imposed by this Order shall be in addition to and not in derogation of any restriction or requirement imposed by any regulations made under the 1984 Act or by or under any other enactment.
3. In this Order, except where the context otherwise requires, the follow expressions have the meanings hereby respectively assigned to them:

"the 2018 Order" means The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) Designation and Traffic Regulation Order 2018.
4. Designation of parking places and loading places and application of the 2018 Order thereto.
 - 1) Each area on a road identified in a map tile as a parking place or loading place and, where applicable, by way of either a map tile label or the map schedule legend, or both, as an area marked out and signed for the use therein of specified classes of vehicles following the conditions specified in the 2018 Order in relation to that type of parking place or loading place, is designated as a parking place or, as the case may be, a loading place.
 - 2) Unless otherwise so identified, a parking place or a loading place shall be bounded on one side of its length by the edge of the carriageway and be an area marked either by a traffic sign or by another method of indicating the extent of a parking place or loading place as specified in the Traffic Signs Regulations and General Directions 2016.
 - 3) The provisions of the 2018 Order (other than Articles 3-1 and 7-1) shall apply to an area designated as a parking place by this Order as if in those provisions any reference to:
 - a) a parking place included a reference to an area designated as a parking place by this Order, and
 - b) a loading place included a reference to an area designated as a loading place by this Order.

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5. Loading prohibition and/or waiting restrictions applicable in prohibited or restricted roads.

Without prejudice to the validity of anything done or to any liability incurred in respect of any act or omission before the coming into operation of this Order, the 2018 Order shall have effect as though any loading prohibition and/or waiting restriction identified in a map tile and, where applicable, by way of either a map tile label or the map schedule legend, or both, and marked out and signed as a loading prohibition and/or waiting restriction shall be construed as though it were a prohibited road and/or a restricted road referred to in the 2018 Order.

6. Without prejudice to the validity of anything done or to any liability incurred in respect of any act or omission before the coming into operation of this Order, The City of Edinburgh Council (Traffic Regulation; Restrictions on Waiting, Loading and Unloading, Stopping and Parking Places) Designation and Traffic Regulation Order 2018, shall have the effect as if, in Schedule 2 to that Order: -

- 1) the version number listed for the following map tiles will increase by one whole number:

1451

Executed by The City of Edinburgh Council this ----day of ---- Two thousand and ----.

(witness)

signed on behalf of Executive Director of Place

Report authorised by Executive Director of Place under Delegated Powers

10 May 2021

Proposed Amendments to Waiting and / or Loading Restrictions, Edinburgh

Routine

Wards - 2 Pentland Hills, 4 Forth, 06 Corstorphine / Murrayfield, 7 Sighthill / Gorgie, 9 Fountainbridge / Craiglockhart, 12 Leith Walk, 13 Leith, 15 Southside / Newington, 16 Liberton / Gilmerton, 17 Portobello / Craigmillar.

Council Commitments [18, 19](#)

1. Recommendations

To commence the statutory process required to introduce and amend Waiting and/or Loading Restrictions as detailed in this report.



Paul Lawrence

Executive Director of Place

Contact: Gavin Graham, Parking and Traffic Regulation Manager

Report

Proposed Amendments to Waiting and / or Loading Restrictions, Edinburgh

2. Executive Summary

The Council, as Roads Authority, has a duty under Section 122 of the Road Traffic Regulation Act to “secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians)”.

The Council, having considered its duties under the terms of the aforementioned Act, has identified locations where there is a need to provide new restrictions, to amend existing restrictions or, as the case may be, to remove existing restrictions on waiting, loading and unloading.

This report provides details for each of the locations where changes are proposed and seeks authority to commence the legal process/es required to introduce, amend or remove said restrictions.

3. Main report

The Council receives many requests related to restrictions on waiting, loading and unloading. These can involve the following types of request:

- new restrictions;
- amendments to existing restrictions; and

- removal of existing restrictions.

In addition, through a process of review of existing restrictions, the Council may itself identify locations where it is necessary to introduce, amend or remove restrictions on-street.

This report provides details for a number of such locations and seeks authority to begin the legal process to make the required changes to the governing traffic orders.

New restrictions

The Council has identified a need for new restrictions at the following locations:

<i>Reference</i>	<i>Location</i>	<i>Restriction</i>	<i>Reason</i>
NR001	Brunstane Mill Road at Milton Road East	Double yellow line: 24 hour restrictions	Improve sightlines
NR002	3 to 7 Charterhall Grove	Double yellow line: 24 hour restrictions	Improve road safety
NR003	Claycot Park at Ladywell Avenue	Double yellow line: 24 hour restrictions	Improve sightlines
NR004	o/s 4 Whitehill Road	Double yellow line: 24 hour restrictions	Improve sightlines
NR005	o/s 12 Clark Place	Double yellow line: 24 hour restrictions	Improve sightlines
NR006	o/s 23 and o/s 45 Dolphin Gardens West	Double yellow line: 24 hour restrictions	Improve road safety
NR007	Whitehill Street at Maingate Medway	Double yellow line: 24 hour restrictions	Improve sightlines
NR008	Gilmerton Dykes Street	Single yellow line with single yellow kerb	Prevent loading /unloading and improve safety

		markings: 07.30- 09.30 and 16.00-18.30	
NR009	Ferniehill Road at Drum Street	Double yellow line: 24 hour restrictions	Improve road safety
NR010	A1 Industrial Estate	Double yellow line: 24 hour restrictions	Improve road safety
NR011	Western Harbour Drive at Western Harbour Way	Double yellow line: 24 hour restrictions	Improve sightlines

NR012	Western Harbour Drive at Western Harbour Place	Double yellow line: 24 hour restrictions	Improve sightlines
NR013	Lower Granton Road at Victoria Court	Double yellow line: 24 hour restrictions	Improve sightlines
NR014	o/s 14 Hermand Street	Double yellow line with double yellow kerb markings	Prevent loading /unloading and improve safety
NR015	Sandpiper Road at Newhaven Place	Double yellow line: 24 hour restrictions	Improve sightlines

Plans showing the location and extent of each of the proposed new restrictions can be found in Appendix 1 to this report.

Amendments to existing restrictions

The Council has identified a need to amend restrictions at the following locations:

<i>Reference</i>	<i>Location</i>	<i>Restriction</i>	<i>Reason</i>
AR001	o/s 50 Seafield Road at Craigentenny Avenue North	Extend double yellow line: 24 hour restrictions	Improve road safety
AR002	o/s 10 Annandale Street	Extend single yellow line	Parking bay removal

AR003	o/s 2 Nellfield	Extend double yellow line: 24 hour restrictions	Improve road safety
AR004	6 Bankhead Crossway North	Extend double yellow line: 24 hour restrictions	Improve road safety

Plans showing the location and extent of each of the restrictions to be amended can be found in Appendix 2 to this report.

4. Next Steps

The legal processes to make the changes detailed in this report will now be commenced. The full detail of those changes can be found within this report and its Appendices.

Once legal processes are complete, work will then commence to make any required changes on-site, to provide, amend or remove signs and / or road markings as required at each location.

5. Financial impact

All costs associated with the changes proposed within this report will be met from the existing budget allocation for Parking.

6. Stakeholder/Community Impact

Many of the changes proposed in this report will have come to the Council's attention as a result of engagement with the public, community groups etc. The legal process allows opportunities for consultation with affected stakeholders. That process involves public consultation, where anyone may make representations in support or in opposition to the proposals.

7. Background reading/external references

None

8. Appendices

Appendix 1 – Proposed New Restrictions Location Plans.

Appendix 2 – Proposed Amended Restrictions Location Plans.