

SAUGHTONHALL CONTROLLED PARKING ZONE

SUBMISSION FROM THE MURRAYFIELD COMMUNITY COUNCIL TO THE CITY OF EDINBURGH COUNCIL TRANSPORT & ENVIRONMENT COMMITTEE

OBJECTIONS

As a local Community Councillor, I write on behalf of the residents of Saughtonhall to object to the proposed CPZ for the area:

- The scheme as it is proposed would not achieve its primary objective of ensuring residents are able to park near their homes. To the contrary, the current scheme would increase parking pressures & detrimentally impact on residents' ability to park near their own home.
- There is no evidence of current parking pressures in this area – the proposal is based on only 2 sample days in November 2018. This data is far too limited and is no longer relevant as it does not take account of the change in parking demands / needs in light of Covid-19
- There is little if any support from local residents for implementation of such a scheme
- The Council failed in its duty and responsibility to properly consult with local residents affected by the proposed changes.

BASIS FOR THE REVIEW/ PROPOSED SCHEME

The Transport and Environment Committee Paper (5 March 2019) suggests that there were "long-standing and significant indications of intrusive commuter parking, particularly in streets adjacent to the A8". This statement has been used to define an objective of reducing this commuter parking across a wide area to the West of Edinburgh, despite there being no evidence of such.

There is nothing to substantiate the claim, with the study relying on responses from residents in a survey undertaken only in Corstorphine. It is also the case that Corstorphine is a very different district centre from Saughtonhall.

The area of Saughtonhall is special in that its approx 1,600 households reside in close proximity to 2 primary schools; 2 rugby stadia; a church; a residents' association hall with grounds; local shops; several 18-hole golf courses; an ice rink; a curling rink; 2 bowling greens; a tram stop; it borders on Edinburgh Zoo, and is used by football fans attending matches at Tynecastle Stadium. While many have on-site parking, inevitably there can be an overspill into the local streets.

Having lived in the area for 30 years, myself, neighbours, family and friends have seldom had a problem parking outside their home. The current white lines outside properties with drives are well respected by all types of visitor and the custom and practice where residents do not have private driveways is for local residents to park free of charge outside or close to their own homes.

There is therefore no basis on which to apply a restrictive parking policy applicable in the Corstorphine area and apply these across an entire corridor, when these areas are very different indeed, such as Saughtonhall.

THE PARKING STUDY

Having read the Strategic Review of Parking Results of Area 1 Review and Corstorphine Consultation Results from 5th March 2019 and it is evident that this is based on very little quantifiable evidence and many assumptions.

The requirements under CEC's Controlled Parking & Priority Parking Protocol (March 2017) suggests that the evidence should consider the following: "Undertake initial monitoring of area over a six month period starting from the date that the requester was notified of the criteria/process. Monitoring to include regular, detailed site visits, recording parking levels and instances of obstructive or inconsiderate parking, as well as recording any additional correspondence received"

However, the survey was undertaken on only 2 sample days on 14th & 15th November 2018 and these were between 10am and 5pm. There was no assessment of parking in the evenings or weekends. There is also no way to identify what was residential and non-residential parking. To assume that because the surveys took place between 10am and 5pm, parking was due to non-residential vehicles is too simplistic and does not take account of the occupation / lifestyle of Saughtonhall residents.

Saughtonhall benefits from a good level of transport links, encouraging residents to use bus & trams for many journeys, which means that cars are more likely to be parked on-street on weekdays, with greater use of cars taking place on evenings and at weekends. If non-residential / commuter parking was an issue, then you would expect to see a change between the kerbline capacity on different days and different times of day – but surveys were not conducted on a sufficient number of days and at different times to support this.

On this basis, the CPZ study is inferring is that, because the Saughtonhall neighbourhood is subject to a 'medium' level of on-street parking occupancy, that there must an issue with residents adopting sustainable travel behaviours; and the proposed CPZ would penalise residents for this.

Para 2.2.2 of the Council report states that "The parking pressure survey was undertaken through observations of usable kerb - side space to determine the severity of the identified parking pressures. The level of severity was measured based on the percentage of usable kerb-side space occupied by parked vehicles on a road-by-road basis and has been shown either as low, medium or high"

A 'high' car parking ratio is itself not an issue if the street or area are simply fulfilling its purpose of meeting the on-street car parking demand of residents living on it – and this is the case in Saughtonhall. There is no reference in the report as to how the available 'occupancy' has been determined so there is no way to calculate the parking pressures that are suggested.

To propose such sweeping & long-term changes based on less than a handful of days, using methodology that is questionable and does not meet your own protocols, does not stand up to scrutiny.

Saughtonhall Heat Map

In Para 4.19.1 is it stated that: "Although many roads in the area are residential, medium to high levels of parking pressure have likely been observed as a result of limited access to off-street parking causing vehicles to be parked on the carriageway."

This is indicative of the fact that many properties in the area do not benefit from driveways. As such, the kerbline fulfils and important function in terms of accommodating the natural car parking from residents.

The subsequent paragraph is less than conclusive when stating that: "The southern section of Balgreen Road and Baird Drive had particularly high levels of parking pressure due to probable commuter parking associated with the Balgreen tram stop. On the site visit obstructive parking and loading activity was observed outside the Scotmid Co-operative which raised road safety concerns at the Balgreen Road / Saughtonhall Drive junction and the signalised pedestrian crossings at the junction."

If something is described as 'probable', this casts significant doubt on the robustness of the observations made. Equally, the activities associated with the deliveries to the Scotmid on the corner of Saughtonhall Drive and Balgreen Road are no more than normal but infrequent practices associated the delivery and servicing arrangements.

If such arrangements are considered to be a problem, there is a loading bay on Balgreen Road which could be marked for this purpose only, rather than be available for all vehicles to use. This would be a relatively easy solution compared to the implementation of area-wide parking restrictions in attempting to resolve a perceived problem, which is neither quantified nor real.

THE PROPOSED ZONING

The current zoning proposal would significantly reduce the availability of parking with large swathes of streets being assigned with double yellow lines, thus precluding parking at any time. In most streets the majority of remaining spaces are to be designated as 'residents only' bays with limited 'visitor parking/ shared bays'

However, some streets, the Southern half of Saughtonhall Drive in particular, would have no designated residents' bays and large sections marked as single yellow lines. With very limited 'visitor' parking in surrounding streets due to the high proportion of resident only bays and double yellow lines, non-residents would be funnelled to Saughtonhall Drive to park.

The resultant effect of these changes would undoubtedly increase the pressure on parking and residents of Saughtonhall Drive would have to compete to secure a parking space with the occupants of 137-151 (and opposite) also denied any parking outside their residences (due to yellow lines) or nearby.

Perhaps there was an assumption that each property in the 'yellow line' zone was a single dwelling and, as such, could use the driveway. But this is NOT the case. They DO NOT have access to off street parking as they only have one access route to their property and this is shared between two households. The 'driveway' cannot accommodate a car for each of the two household and, as there is no separate path to the houses, they would have to navigate a very narrow area around any car to access their front door if a car is parked off street.

To deny residents parking outside their homes is clearly contrary to the principal objective of the proposed scheme.

There are also significant environmental considerations in relation to this scheme. Have the negative effects on wildlife, lack of rainfall run-off (in an area immediately bordering on extensive flood prevention measures), pedestrian right of way, or the effect on the street aesthetics?

In addition to increasing parking pressures the scheme, if implemented, would have a hugely detrimental impact on the look of our streetscapes. Having spoken to many neighbours and residents of the area, they have significant concerns that they will be denied parking outside their homes and believe that their only option will be to convert their front gardens into parking spaces.

THE CONSULTATION PROCESS

The consultation process was badly flawed. The Council did not inform all affected households of the Consultation on the proposed Saughtonhall CPZ, nor did they provide adequate information on the details of the proposal or the opportunity for residents to engage in the process.

The leaflet provided no substantive information on the proposed changes. Given the demographics of residents, many either have no internet access or are without the skills to log onto a Microsoft Teams meeting, or to navigate an interactive map to view the proposals. It is understandable that a public meeting couldn't be held due to Covid restrictions, but the opportunity for an open, democratic consultation has been denied to the residents in Saughtonhall.

When queried about the online consultation, a Council official stated in an email response there had been a "good attendance" at the two online meetings. Having attended the first on 22 February, there were only 14 people present and this number included Council official, Andrew Mackay, and survey company representative, Jess Lloyd. At the second consultation meeting, there were 18 attendees in total. Several residents were frustrated to be left in the waiting room and unable to join the meetings.

To suggest that 28 total resident attendees out of some 1,600 households indicates a good representative sample of the area is ludicrous and does not bear scrutiny.

The Council has a duty to ensure that information is readily accessible to all residents and this is clearly not the case. Without access to the information people were denied the opportunity to offer informed comments / provide input on the plans.

After considerable pressure, The Council announced an extension of the consultation deadline (a tacit admission I would suggest that Council officials got that consultation wrong). However, notification of the extension was only communicated via email to those who had already returned the survey.

The survey was also poorly designed with questions, possibly intentional, to suggest that there is a parking problem in the area e.g. "what parking improvements would you like to see?"; "If parking improvements are to be introduced, during what times.."

"Further comments" were restricted to 255 characters - approx 50 words for clarification or comment, hardly enough. 50 words is less than this current and the previous paragraph. Any further comments had to be sent by email.

CONCLUSION

Implementation of the CPZ would result in significantly less space, creating the very parking pressures the Council claim they are looking to address & there is no substantive evidence

for the designation of residents, shared bays, single & yellow lines being applied to various streets within the Saughtonhall area.

The (suggested) commuter parking pressures on which the study was predicated in late 2018 is no longer pertinent or relevant to the area in 2021. This historical survey data is no longer relevant as the assumptions about non-residential parking and commuting to work were made before Coronavirus.

The Covid-19 situation has resulted in increased home working and there is noticeably less parking /traffic in the area. It remains to be seen how work patterns and daily commuting will look post-pandemic. It may be that the need for non-residential parking will be considerably lower as, is widely suggested in the media, an increasing proportion of workers choose to work from home.

This Council-wide “strategic pro-active approach” (Council CPZ leaflet) fails to take into account changed social and work patterns and local democratic opinion; and these propose sweeping ‘one size fits all’ changes are not needed, not wanted and cannot be supported by the parking study undertaken.

On behalf of the residents of Saughtonhall we would like the proposed scheme is withdrawn.

Alternatively, we would request that any final decision be deferred for a period of at least two years until travel and work patterns are re-established and a new, comprehensive parking review of the Saughtonhall area taking into account post-Covid work and leisure patterns is undertaken.

I appreciate your consideration of this submission and would be happy to discuss the proposals, issues & objections as they pertain to Saughtonhall.

Thank you.

David Dawson
Murrayfield Community Council
14 June 2021