

# **Living Streets Edinburgh Group: Comments on the City of Edinburgh Council's Draft Parking Action Plan, 2023**

## **Introduction and Summary**

The general analysis and aims of the parking plan (contributing to strategic objectives of reducing traffic, encouraging active and public transport, placemaking etc.) are sound. However, the plan lacks detail and ambition, especially on the role of how parking controls will contribute to the aim of reducing car mileage by 30% by 2030.

There are few numbers in the Plan - eg of how many on-street spaces there are - or should be, of enforcement activity, trends for impounding vehicles, etc. The exception is the 'Measuring Success' section, which includes a "biannual decrease from the 24,498 active residents' parking permits". It is not clear why targets are "biannual" (ie every 6 months).

In common with other draft plans, the 'Actions' aren't specific enough - 'develop', 'continue', 'manage' etc...

The Stakeholder Engagement section claims that the Plan is the product of three years of consultation and also discussed at the Transport Forum. LSEG has not been involved in any such engagement.

## **Parking controls**

The Plan should qualify how many parking spaces (at least on-street) there are currently, and how many it aims to have in the future. This is especially important for 'Action 3': "Review and amend waiting and loading restrictions on main traffic routes...to improve sustainable mobility". There should be a specific aspiration here to cut the number of vehicle spaces on these key routes and numeric targets set. (For example: "reduce parking on chief bus routes by 20% by 2026.") This is essential if we are able to tell if the objectives are being met.

There is no sense of a strategy for 'kerbside management' - especially in 'town centres', where we must minimise vehicle space especially if we are to increase pedestrian space.

There is no information about income from on-street parking, and from penalties. Future projections (for example including the significant reduction in income from George Street) should be provided.

There is no sense of the respective roles of council-provided (on-street) parking and commercial (off-street) parking: for example, including the 1600 spaces at the St James Centre, which was opened since the past PAP was produced.

## **Enforcement**

It is noted that the contractor NSL has responsibilities regarding signage and lines. The contractor should be identifying and removing redundant signage on poles (eg 'No Loading' (any time)) which have not been required since the TSRGD was amended in 2016.

There is no mention of towing of illegally parked vehicles. This is an effective deterrent against the worst cases of parking infringement and used to be much more common in Edinburgh. We welcome the recent initiative where parking attendants are travelling on Lothian Buses to ticket vehicles parked at bus stops: but it would be more effective to tow them instantly.

There is no mention of enforcement of Blue Badge parking: again we need to see the numbers. For example how many PCNs have been issued for illegal parking in Blue Badge bays, and what are the targets for the future? As Blue Badges become a gateway to new privileges (eg LEZ exemption) effective policing of Blue Badge use will become even more important.

## **New enforcement powers (responsible parking)**

The Plan gives no insight into how enforcement of the new bans on parking on the pavements and on dropped kerbs will take place outwith the Controlled Parking Zones (where there are currently no attendants).

The paragraph on the Council's policy on potentially excepting streets from the pavement parking ban is misleading. We suggest it should read: "Furthermore, the Council approved a motion at its meeting on 25 August 2022, confirming that no exceptions would be considered..."

The Plan gives no clue as to how the Council will address streets where pavement parking has been the norm for years (or decades (for example Telford Road, Marlborough/Regent streets, Portobello).

We welcome the recent increase in the the penalties for illegal parking (which had not been increased for over 20 years). The Plan should project what these penalties will mean in terms of discouraging parking, on income generation and what the additional income should be spent on. We would advocate increased parking enforcement activity, especially in areas outwith the CPZ.

## **Reducing Vehicle emissions**

There is no mention of idling or council action to discourage it. We know that there is currently no enforcement activity at all, which needs to change.

There is a section on Electric Vehicle Charging: we query if this belongs in the Parking Action Plan at all?

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