



**East Suffolk House, Riduna Park, Station
Road, Melton, Woodbridge, IP12 1RT**

Scrutiny Committee

Members:

Councillor Stuart Bird (Chairman)
Councillor Mike Deacon (Vice-Chairman)
Councillor Edward Back
Councillor David Beavan
Councillor Judy Cloke
Councillor Linda Coulam
Councillor Andree Gee
Councillor Louise Gooch
Councillor Tracey Green
Councillor Geoff Lynch
Councillor Mark Newton
Councillor Keith Robinson
Councillor Caroline Topping

Members are invited to an **Extraordinary Meeting of the Scrutiny Committee** to be held on **Monday 16 November 2020 at 6:30pm**

This Meeting will be conducted remotely, pursuant to the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020.

The Meeting will be facilitated using the Zoom video conferencing system and broadcast via the East Suffolk Council YouTube channel at <https://youtu.be/SH9aEnedrH0>

An Agenda is set out below.

Part One – Open to the Public

Pages

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- | | | |
|----------|---|---------------|
| 1 | Apologies for Absence and Substitutions | |
| 2 | Declarations of Interest
Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered. | |
| 3 | Review of Parking Management and Civil Parking Enforcement ES/0556
Report of the Cabinet Member with responsibility for Transport | 1 - 25 |
| 4 | Scrutiny Committee's Forward Work Programme
To receive and consider a draft remit for a proposed Task and Finish Group | |

Part Two – Exempt/Confidential

Pages

There are no Exempt or Confidential items for this Agenda.

Close



Stephen Baker, Chief Executive

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SCRUTINY COMMITTEE

Monday 16 November 2020

REVIEW OF PARKING MANAGEMENT AND CIVIL PARKING ENFORCEMENT

EXECUTIVE SUMMARY	
1.	This report provides Scrutiny Committee with information about Civil Parking Enforcement (CPE) and car park charging in the East Suffolk District. This is in response to a request for a review from its meeting of 15 October 2020.
2.	The purpose of the review is to respond to the concern raised by Members, namely “to establish whether the introduction was consulted upon properly, whether the impact of a 430% increase in charge to residents was considered acceptable and whether, or not, the model for this introduction was based on flawed assumptions”.

Is this report Open or Exempt?	Open
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Wards Affected:	All
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Cabinet Member:	Cllr Norman Brooks, Cabinet Member with responsibility for Transport
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Supporting Officer:	Lewis Boudville Transport, Infrastructure and Parking Services Manager 01394 444223 lewis.boudville@eastssuffolk.gov.uk
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1 INTRODUCTION

- 1.1 East Suffolk Council, upon its formation in 2019, inherited a diverse range of parking tariffs and policies that reflected its history as two sovereign councils. These included a lack of consistency around fees and charges, and a need to modernise and standardise its administrative arrangements. During 2020, East Suffolk Council embarked on a process of streamlining and modernising its parking services, culminating in a paper setting out proposals in February 2020. Change was considered necessary to achieve a number of outcomes:
- To introduce an effective Civil Parking Enforcement (CPE) to improve on street parking
 - To standardise parking charging across the district.
 - To support town centre shopping through the introduction of free parking periods in town centre car parks.
 - To digitise permits in order to improve access and reduce the potential for misuse.
- 1.2 Cllr Cloke suggested to the Scrutiny Committee that a review be conducted with the purpose being “To establish whether the introduction was consulted upon properly, whether the impact of a 430% increase in charge to residents was considered acceptable and whether, or not, the model for this introduction was based on flawed assumptions”. This purpose specifically relates to the fees for various ticket options now available.
- 1.3 The scoping form identifies the main issues and concerns to be considered and these are responded to in Section 5 of this report.

2 PROGRESS TO DATE

- 2.1 The focus of the questions from the Committee are on the impact of the changes, and their implementation, and it is hoped that this paper will answer those questions. The service acknowledges that in some cases, there have been issues with the roll out, however it is worth considering the improvements that the recent changes have made. They include:
- i) ESC’s partnership work with SCC, Suffolk Police, Ipswich Borough Council, and West Suffolk Council, in setting up CPE.
 - ii) The employment, training (Level 2 Award for Parking Enforcement Officers), and deployment of two Civil Enforcement Officers (‘CEO’) Supervisors and twenty CEOs.
 - iii) The employment, training (Level 3 Award in Notice Processing), and deployment of one Assistant Parking Services Manager and four Notice Processing Officers (NPOs).
 - iv) Configuration of the Penalty Charge Notice (PCN) processing system with a customer portal. This system is based on the Taranto platform, which is produced by the national specialist transport consultancy, WSP. The system is configured with 1,157 streets in the district comprising 7,280 regulations for patrol; and 75 demand managed off-street parking places. The system enables

the efficient and effective patrolling of on-street and off-street regulations. For example, it automates many of the functions that CEOs previously had to carry out manually and minimises paperwork.

- v) The introduction of the customer portal through which drivers served with a PCN may view the evidence proving the contravention took place, and then pay the penalty charge or 'appeal' its serving. This means that the process for paying fines is simple, and efficient.
- vi) The introduction of the new permit portal through which permits (for example, residents' parking permits), exemptions (which can be issued in an area where there is limited off street parking available) and other administered. Whilst these changes have prompted a volume of correspondence, in the longer term, the online permit portal offers a simple way for people to buy and manage permits, and allows East Suffolk Council to enforce permit parking in a way that it has not been able to do previously.
- vii) The procurement of six electric vehicles for CEO deployment. The vehicles have travelled more than 27,000 miles so far whilst on patrol benefitting the environment by reducing noise and air pollution.
- viii) The procurement and employment of 100% recyclable PCN tickets – it is calculated the service will use more than 20,000 of these each year.
- ix) The configuration of the RingGo parking service, including an app for smartphone users, through which drivers can navigate to any of the Council's seventy-five demand managed parking places (or more than 15,000 across the country). They can also pay for their parking session and extend it should they wish (where permitted). For the months of July, August, and September, the RingGo service has:
 - Enabled more than 17,000,000 users to see the Council's demand managed parking places.
 - Increased usage by 155% on 2019 with a total of 130,000 parking sessions.
 - Increased revenue by 158% on 2019 taking nearly three ton of coins from the pay-and-display cash payment system, saving 33 vehicle loads of cash collection equating to more than 2,600 vehicle miles, plus cash handling time.
- x) Procured and installed 1,134 new signs and posts in ESC's off-street parking places (and removed many more) providing customers with clear and accurate information.
- xi) The upgrading of ninety-six pay-and-display machines with alpha-numeric keypads and configuration and deployment of the new parking fees.
- xii) Since the commencement of CPE, the Parking Services operation has:
 - Spent more than 12,000 hours patrolling more than 60,000 streets;
 - Started more than 22,000 observations (which is when a CEO observes a vehicle to see whether it has parked illegally) and detected more than 8,000 illegal parking practices. This contrasts with the low level of enforcement activity when CPE was under the control of the Police.

- Processed more than 1,200 appeals
- Processed and issued more than 1,000 permits, exemptions and dispensations (in a six-week period).

3 BACKGROUND

- 3.1 At its meeting of 4 February 2020, Cabinet resolved to adopt a new approach to parking demand management. With regard to the setting of tariffs, the intention was that parking services could more easily be shown to support economic development and regeneration, for example by providing periods of free parking in town centre car parks. In terms of the adoption of CPE, the hope was that the council's enforcement service would address issues of safety caused by poor parking – and ensure that car parking spaces were not being monopolised by people overstaying in parking bays.
- 3.2 CPE powers were to be delegated from SCC in 2020, which had been a long-held ambition of both Waveney and Suffolk Coastal District Councils. This had been previously approved by the Cabinets of Waveney District Council and Suffolk Coastal District Council.
- 3.3 Efficient and effective CPE administration relies on the regulations and rules managing parking demand at trip generators (such as residential streets) and trip attractors (such as town centres and leisure destinations) being clear so drivers can respond accordingly. CPE was supported by both predecessor councils of ESC as a way of providing the council with the powers to deal with problem parking in the community.
- 3.4 The review of parking tariffs and arrangements that the council carried out identified a wide number of inconsistencies in the arrangements for parking across the district – for example, in the setting of season ticket prices. For example, the previous Order contained more than fifty different tariffs in East Suffolk, more than one hundred 'special arrangements' and multiple season ticket options across the district with the annual fee ranging from as little as £25 to a maximum of £400. It was resolved to rationalise and simplify tariffs for East Suffolk and Section 4 of the February Cabinet report titled 'Parking demand management and tariffs' provided detail for these considerations, especially paragraphs 4.1 to 4.7.
- 3.5 The support for, and the approach to restructuring tariffs came from ESC's Economic Development team's 'People & Places: Revitalising East Suffolk Towns' project. This provides an evidence base to inform how parking management can be used as part of a package of measures to positively influence the economic success of each town". The data referred to comprised nearly three-million parking events in the Council's parking places; town specific surveys by a nationally respected consultant for town centre management and place-making; and on-street parking place provision.
- 3.6 Section 4 of the February Cabinet report also included suggested improvements for customer service, the environment, cash collection efficiency, and the resident and

customer experience using digital services (in support of ES21 to “Provide an innovative, more customer friendly, transactional and intuitive Council website”).

- 3.7 All the considerations covered by the February report have been incorporated into the new Parking Services operation

Consultation

- 3.8 The current ‘Order’ was consulted upon from 16 March 2020 with the Public Notice placed in local newspapers (East Anglian Daily Times and Beccles, Bungay and Lowestoft Journal), in every Council off-street parking place subject to the Order, and via a dedicated Council web page.
- 3.9 The dedicated web page included the rationale for the new approach to parking management, and access to the Order. The Order’s tariffs were summarised by a quick reference ‘tariffs by town’ document.
- 3.10 The Coronavirus lockdown commenced 23 March 2020 and the decision was taken to extend the consultation period from the advertised consultation closing date of 14 April 2020 to 30 April 2020. The extension was published on the dedicated web page, and those who contacted the Council requesting an extension, were advised of the new deadline for responses.
- 3.11 The consultation closed 30 April 2020 with two-hundred and eighty-six responses received. The responses were considered by town and theme. The table below shows the number of responses by town:

Table 1. Feedback for:	Responses	Proportion
Wickham Market	113	39.51%
Felixstowe	64	22.38%
Halesworth	59	20.63%
Not specified	13	4.55%
Beccles	12	4.20%
No comment	10	3.50%
Bungay	9	3.15%
Southwold	2	0.70%
Woodbridge	2	0.70%
Aldeburgh	1	0.35%
Lowestoft	1	0.35%

This table shows an example of the types of responses received – in this case, for Bungay:

Table 3. Bungay themes	Responses	Proportion
Too expensive	5	55.6%
Season Ticket expensive	4	44.4%
Permit scheme	3	33.3%
Bungay: Nethergate objections	2	22.2%
Bungay: More capacity	1	11.1%
Bungay: More fees	1	11.1%

- 3.12 A consultation results briefing note was compiled for consideration by senior officers and councillors. Key themes of the feedback were 'more zero-free parking' and 'increased value for regular users'.
- 3.13 These were accommodated within the rationale for the Council's updated approach to parking management in the context of place-making and town centre management. And the following changes were included in the making of the Order:
- The tariffs in Beccles were made the same as those in Bungay and Halesworth
 - The 30-minute zero-free ticket option was added to Thoroughfare, Halesworth to match the other parking places in Halesworth.
 - The Annual Ticket was added so the most regular users in a long stay parking place achieved twelve months parking for the price of ten months.
- 3.14 The 'Order' was Sealed 20 August 2020 and came into operation from 21 August 2020, as and when new tariff boards were installed in the parking places, and the pay-and-display machines were upgraded. The Order sealing and its commencement were publicised in local newspapers and via a dedicated Council web page named 'Parking places'. 'The Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020' relaxes notice requirements at present and makes provision for "... alternative arrangements as the local authority considers appropriate...". Notices in every Council off-street parking place subject to the Order was considered not appropriate given the Notice was not inviting responses to a consultation.

4 TRAFFIC REGULATION ORDER AND OFF-STREET PARKING PLACES ORDER

- 4.1 CPE and parking management is administered under two different legal documents:
- Traffic Regulation Orders (TROs) for on-street management; and
 - Off-Street Parking Places Orders for off-street management.

TROs for on-street parking management

- 4.2 The TRO is a Suffolk County Council document, and it sets out provisions for on street restrictions – such as resident's parking zones, and permit schemes.
- 4.3 The 'Suffolk County Council (District of Waveney) (Stopping, waiting and loading prohibitions and restrictions and on-street parking places) (Map-based) Order 2018' and the 'Suffolk County Council (District of Suffolk Coastal) (Stopping, waiting and loading prohibitions and restrictions and on-street parking places) (Map-based) Order 2019' make law kerb-space management regulations. 'Suffolk Traffweb' is available from SCC's website and it is a mapping tool through which all the kerb-space management regulations in the County can be seen.
- 4.4 SCC's TRO for Waveney stipulates the rules for 'Permit holder' schemes, and Articles 20. and 21. confirm vehicles in a permit parking place must display either "... a valid residents' permit, a visitor's permit, a visitor's parking voucher, a health and social care permit... for that vehicle for that time and for that zone...", and the

District Council may issue “... up to one residents’ parking permit per postal address... for a qualifying vehicle in in the relevant zone for which they qualify...”.

- 4.5 Therefore, via a new permit management system with a customer portal, the Council is administering permits in accordance with the provisions of the Suffolk County Council TRO by providing:
- One ‘Resident Permit’ per household registered to one of its vehicles
 - Up to thirty ‘Visitor Vouchers’ per household in a thirty-day period
 - One ‘Visitor Voucher Eligibility’ per household so households in permit scheme areas who choose not to have a Resident Permit, or do not own a vehicle, may still access Visitor Vouchers
 - One ‘Health and social care permit’ per carer which allows registered carers administering care in permit scheme areas to access up to twenty ‘carer vouchers’ in a thirty-day period
- 4.6 Additionally, and by discretion, TROs allow certain exemptions, waivers, and dispensations to be issued. Some are specific, such as the exemption for residents living in Peddars Lane, Beccles. Some exemptions, waivers, and dispensations are general and each application must be considered carefully to ensure ‘road user safety’ and ‘traffic flow’ are not compromised by allowing a vehicle to be somewhere it should not be (for example on double yellow lines) the type of regulation and its purpose are significant factors when considering exemptions.
- 4.7 It is important to note the TROs named in 4.4 have not been amended. The ‘change’ experienced by some is in the administration process linked with the Council’s new permit management system and its customer portal.
- 4.8 The new permit management portal is available via the ‘Permits, exemptions and dispensations’ web page available via www.eastsuffolk.gov.uk/parking. This service satisfies ES21 to “Provide an innovative, more customer friendly, transactional and intuitive Council website”.

Off-street parking management and ticket options

- 4.9 The ‘Order’ is an East Suffolk Council document, and it sets out regulations and charges for our car parks.
- 4.10 The ‘Order’ makes provision in law the regulations for off-street parking places’ management. Off-street parking places are often referred to as ‘car parks’, but many of the Council’s parking places also provide for cycles and motorcycles, and some even provide for motorcaravans and coaches.
- 4.11 The ‘Order’ was consulted upon from 16 March 2020 with the Public Notice placed in local newspapers (‘East Anglian Daily Times’ and ‘Beccles, Bungay and Lowestoft Journal’), in every Council off-street parking place subject to the ‘Order’, and via a dedicated Council web page.
- 4.12 The dedicated web page included the rationale for the new approach to parking management, and access to the Order. The Order’s tariffs were summarised by a quick reference ‘tariffs by town’ document.
- 4.13 The Coronavirus lockdown commenced 23 March 2020 and the decision was taken to extend the consultation period from the advertised closing date of 14 April 2020

to 30 April 2020. The extension was published on the dedicated web page, and those who contacted the Council requesting an extension, were advised of the new deadline for responses.

- 4.14 The consultation closed 30 April 2020 with two-hundred and eighty-six responses received. The responses were considered by town and theme.
- 4.15 A consultation results briefing note was compiled for consideration by senior officers and councillors. Key themes of the feedback were 'more zero-fee parking' and 'increased value for regular users'.
- 4.16 These were accommodated within the rationale for the Council's new approach to parking management in the context of place-making and town centre management. And the following changes were included in the making of the Order:
- 4.17 The 'Order' came into operation from 21 August 2020, as and when new signs were installed in the parking places, and the pay-and-display machines were upgraded. The Order sealing and its commencement were publicised in local newspapers and via a dedicated Council web page named 'Parking places'. 'The Traffic Orders Procedure (Coronavirus) (Amendment) (England) Regulations 2020' relaxes notice requirements at present and makes provision for "... alternative arrangements as the local authority considers appropriate...". Notices in every Council off-street parking place subject to the Order was considered not appropriate given the Notice was not inviting responses to a consultation.
- 4.18 It should be noted that following the sealing of the order, an administrative error was noticed. The error had the effect of introducing 30 minutes free parking in car parks where it was not intended in the February cabinet report (and not introducing it in some car parks where it *was* intended). This issue has been subsequently resolved by a Cabinet decision in November 2020, in which the 30-minute free parking provision was corrected to match the February report – and introduced in several additional car parks.

5 THE 'MAIN ISSUES AND CONCERNS TO BE CONSIDERED' BY SCRUTINY COMMITTEE

- 5.1 The significant increase in the cost of annual car parking fees.

Response: The range of annual ticket fees provided by the previous Orders for Waveney and Suffolk Coastal confirmed there was no consistency in calculating the fee levels, which ranged from £25 in Sizewell to £150 in Bungay, and £400 in other parts of the District. It was resolved to rationalise and simplify tariffs by Cabinet in its February 2020 meeting, which ratified the earlier decisions made by Cabinets from the former Waveney District Council and Suffolk Coastal District Council. The following calculations were made to arrive at the monthly and annual ticket options.

The daily ticket fee could add up to £1,460 per year for a seven-day week user, and £1,040 for a five-day week user. The Council's proposal offered improved value via a monthly ticket option, and following requests for improved discount from the consultation, an annual ticket option was added to provide better value still.

The monthly fee of £65 is calculated for a five-day week at £4 per day and discounted by twenty-five per cent providing an equivalent daily fee of £3. Increased value is offered by the annual fee, which provides twelve months' worth

of parking for the price of ten months. The table below illustrates the potential savings by the monthly and annual fees; however, drivers will need to calculate for themselves the value they can extract from these ticket options.

Fee options	Fee	Daily fee equivalent based on a 5-day week user	Daily fee equivalent based on a 7-day week user	Illustrative discount for a 5-day week user	Illustrative discount for a 7-day week user
Daily	£4.00	£4.00	£4.00	0.0%	0.0%
Monthly	£65.00	£3.00	£2.14	25.0%	46.5%
Annual	£650.00	£2.50	£1.78	37.5%	55.5%

The monthly ticket option is more akin to a subscription service and therefore more affordable for many, rather than committing to the annual ticket fee in a single transaction.

The daily fee equivalents provide exceptional value, especially when compared with the £2 and £3 (lower and higher tariff levels) for parking sessions up to four-hours long.

Drivers choosing to park their vehicles regularly in an off-street parking place have a choice to buy a daily ticket or achieve increased value by choosing to buy a monthly or annual ticket.

Parking management is only one component of travel demand management, and the monthly and annual ticket options are also set with consideration to ticket prices for bus travel (for Lowestoft). Cost-conscious travellers may choose to travel by bus if this is the deciding factor for their chosen mode of travel. For example, the 'Lowestoft Town Zone Adult' tickets are £54.33 per month and £590 per year; and the 'Woodbridge + Ipswich Zone Adult' tickets (and others in the south of the district) are £74.33 per month and £800 per year.

The Council's monthly and annual ticket prices are more than those for bus travel in and around Lowestoft, and parking fees should be set as such to encourage travel by sustainable modes.

The comparison of fees with travel by bus illustrates the Council's fees are fair and reasonable in the context of other travel modes, although they are not consistent for encouraging sustainable travel across the whole district.

5.2 The difficulty carers face in being able to park in residents' only areas

Response: Paragraph 4.4 above confirms a 'Health and social care permit' is available for registered carers. Paragraph 4.5 confirms this permit type is available from the Council's website. For ease of reference, the web content is:

"Those working in health and social care sometimes serve residents living in permit parking zones. Some zones are designed with all the kerb-space regulated in some way and these often include time-limited waiting bays, and some zones are designed with sections of kerb-space left unregulated; both provide parking opportunities for those visiting residents. It might be necessary for those delivering health and social care in the community to park in the permit holder bays and the

Health and Social Care Permit, administered as carer vouchers, facilitates parking within permit regulated bays. Carers wishing to access the additional parking opportunities provided by carer vouchers should register on the parking portal. When registering for carer vouchers, proof of employment with a health and social care provider, vehicle ownership and payment card details are required. Registration is £8 per year and this provides up to twenty carer vouchers in a thirty day period. Carers may activate a voucher for a specific vehicle registration number when providing care for a resident living in the permit parking zone."

- 5.3 The impossibility of being able to get a free half hour more than once a day affecting parents at drop off and pick up time.

Response: There are two ways in which drivers may obtain a 30-minute zero fee ticket or choose to pay for their parking session; via the RingGo parking app and the pay-and-display machine. Each is configured for one 30-minute ticket each day to prevent drivers parking in contravention of the off-street Order. In practise, it would be difficult to manage a group of people (parents) being able to access two half hour free slots through Ringo.

- 5.4 Residents who have been asking for a scheme being given a parking ticket which they have to challenge.

Response: TROs allow certain exemptions, waivers, and dispensations to be issued, and only once applications have been approved will drivers be exempt for the place and for the reasons the exemption was introduced. This must be the case because regulations are installed for 'road user safety', 'traffic flow' and 'balancing parking demand' reasons, and the consequence of illegal parking practices can be killed or seriously injured road users.

- 5.5 The difference in price of said parking schemes and car parks (£50 vs £650 pa).

Response: The highway is for the passing and repassing of the travelling public without let or hinderance. Therefore, the highway is not intended for the storage of privately owned motor vehicles. Privately owned vehicles should be kept within the owner's residence, but much housing stock was built before the car existed and there is no provision for it. Where possible TROs manage kerb-space for 'balancing parking demand' as well as road user safety and 'traffic flow' reasons. The fees set for permits, exemptions and dispensations are essentially administrative fees contributing to the administration of highways management and CPE administration.

In contrast with the highway, the Council's off-street parking places provide parking opportunities for those choosing to access trip attractors by motor vehicle, which is most commonly the car. Fees are set to encourage parking practices for the benefit of the location, e.g. encourage longer dwell times in town centres so visitors can relax, which in turn has economic benefits for leisure and retail businesses. Fees are also set to give the most regular users improved value, and these may include residents living nearby who cannot accommodate their vehicle within the confines of their residence.

- 5.6 Difficulty in using the parking website to register for a scheme.

Response: It is not clear from this statement the information that is required. However, if it is pertaining to 'requests for parking management schemes', a new

web page will have been made available via www.eastsuffolk.gov.uk/parking before this Scrutiny Committee convenes.

- 5.7 The lack of clear signage in some areas., making the task of the wardens more difficult.

Response: It is not clear from this statement the information that is required. However, if it is pertaining to TROs, all lining and signing deficiencies are reported to SCC because it is responsible for installation compliance with Statutory Instrument '2016 No. 362 – Traffic Signs Regulations and General Directions 2016', which is supported by the 'Traffic Signs Manual'.

If this statement is pertaining to the off-street parking places Order, the Council has just invested in a new signs' installation programme and a typical installation can be seen in Appendix A.

6 CONCLUSION

- 6.1 This report summarises the improvements that have been made in the parking service since February. These include:

- The introduction of Civil Parking Enforcement where previously there was none.
- The introduction of a digital permit system to allow easier purchasing, and more effective enforcement,
- The introduction of a new digital enforcement system to aid CEOs as they carry out their work to ensure road safety and ensure the churn of available parking places across the district.
- The introduction of new tariffs, including a free half hour parking period.

- 6.2 The information contained within this report serves to confirm:

- (1) The process for consulting on and making the 'Off-Street Parking Places Order 2020' introducing the new ticket fees was completed properly and in accordance with the relevant legislation (paragraphs 3.9 to 3.15 above).
- (2) The increase in charges is a result of historic incomprehensible fee setting processes, and not because the model for this introduction was based on flawed assumptions. Overall, these changes have been cost neutral for the council.
- (3) No further review or action is necessary because the "main issues and concerns" raised are the intentional change in the Council's policy for parking management rather than 'flawed assumptions' and 'insufficient data' informing the change in policy.

7 HOW DOES THIS RELATE TO THE EAST SUFFOLK BUSINESS PLAN?

- 7.1 The introduction of the Off-Street Parking Places Order 2020 helps to deliver action ES17, i.e. "Increase visitor numbers to East Suffolk outside of the main tourist seasons" (paragraph 5.1 xiii) (1) above).
- 7.2 The systems employed in the administration of parking services helps to deliver action ES21, i.e. "Provide an innovative, more customer friendly, transactional and intuitive Council website".

8 FINANCIAL AND GOVERNANCE IMPLICATIONS

- 8.1 'Section 55 of the Road Traffic Regulation Act 1984' sets in law 'Financial provisions relating to designation orders'.
- 8.2 Penalty charges from CPE administration and parking fees from the Council's off-street parking places contribute to the administration of CPE and related parking services.
- 8.3 Any surplus from off-street parking places fees is used for the administration of other services such highway services, street lighting, public conveniences, outdoor leisure, and capital works. These Council services do not generate a financial return and parking fees contribute to the delivery of these free services.
- 8.4 This report has been completed with the benefit of an Equality Impact Assessment.

9 CONSULTATION

- 9.1 We have consulted with the Cabinet Member for Transport in the writing of this report.

10 REASON FOR RECOMMENDATION

- 10.1 The information in this report provides background and context for the following recommendation.

RECOMMENDATION

- 1. That, having reviewed and questioned this report, the Scrutiny Committee considers the information contained within it and makes recommendations, to Cabinet, as appropriate

APPENDICES	
Appendix A:	Typical signs' installation
Appendix B:	Written questions submitted by the Scrutiny Committee and the written responses provided

BACKGROUND Please note that copies of background papers have not been published on the Council's website www.eastsuffolk.gov.uk but copies of the background papers listed below are available for public inspection free of charge by contacting the relevant Council Department.		
Date	Type	Available From
6 November 2018	Suffolk Coastal: Result of the stakeholder consultation on the draft East Suffolk Area Parking Plan (CAB 39/18)	www.eastsuffolk.gov.uk
6 November 2018	Suffolk Coastal: Proposed simplification and alignment of the Suffolk Coastal and Waveney District car park tariffs to enable the creation of a single East Suffolk tariff structure (CAB 41/18)	www.eastsuffolk.gov.uk
2 January 2019	Suffolk Coastal: Proposed new East Suffolk Off-street parking places Order (CAB 04/19)	www.eastsuffolk.gov.uk
4 February 2020	Parking Services: Parking Management and CPE	www.eastsuffolk.gov.uk

APPENDIX A: TYPICAL SIGNS' INSTALLATION



Review of Parking Management and Civil Parking Enforcement

Q1: Traffic Regulation Order for on-street parking management (paragraphs 4.4 – 4.8 of the report)

Cllr Beavan

- (a) How many of these dispensations apply in areas which are still waiting for a residents' permit parking scheme?
- (b) The issue of a dispensation permit for such residents to use time limited on street parking spaces is welcome, but how can we help people who have no time limited parking nearby?
- (c) Is it an equality impact issue that the elderly and infirm are still having to park a long way away from their residence or even fear to move their car in case they lose their parking space, increasing social isolation and reducing independence?

Cllr Cloke

I support wholeheartedly the introduction of CPE, there has been too much unmanaged parking in our town for too long, however

- (d) How can a TRO and application for residents' parking permits / exemptions be arranged, potentially for a group of elderly Alms-house residents?
- (e) What instructions have the wardens been given about vehicles on pavements? There seems to be a lack of consistency, for example, a business van parked on a pub forecourt, within the curtilage of the pub, gets a ticket; but not one vehicle parked on the pavement at the Butter Cross was ticketed.
- (f) How are abuses of the blue badge system managed, specifically about a vehicle parked all day and the dial of the badge being moved on? Several tickets have been issued, but how is this enforced?

Cllr Deacon

- (g) Is there any discussion between the Parking Management team and the Police regarding on street parking problems?
- (h) How long would it normally take to respond to residents' queries?

A1:

- (a) Dispensations are regulation specific, not area. However, only the 'Resident Exemption' (dispensation type) might be an indicator for places where a parking management scheme for the benefit of residents. As advised in paragraph 5.6 of the Scrutiny report, a new tool for requesting parking management schemes will be available at the time of the Scrutiny committee.
- (b) It always remains the driver's responsibility to park legally and considerately. It is not a local authority duty to provide individual parking solutions for residents. However, individuals who choose to own a motor car to satisfy their travel needs and choose a residence without its own off-street parking provision, may choose to use one of the Council's off-street parking places for their parking solution.
- (c) Difficult as those circumstances are, the district council is not able to provide individual solutions to car storage for local residents.
- (d) As advised in paragraph 5.6 of the Scrutiny report, a new tool for requesting parking management schemes will be available at the time of the Scrutiny committee.
- (e) This question includes specific examples and further detail is required to answer the quoted cases. However, more generally, the examples relate to two very different circumstances. The first appears to relate to private land. Owners of private property may choose to enforce against inappropriate parking practices on their land, or not. ESC does not administer CPE on private property, but it is known there are some private operators in the district providing services protecting private property. Regarding 'public' "pavement parking", every attempt is made to enforce these consistently within the East Suffolk area, information is available on ESC's 'Nuisance parking' webpage, but for ease of reference the content is provided below.

"It is imperative all drivers comply with the [rules and laws of the highway](#) regardless of whether or not kerb-space management regulations are installed. Dangerous, obstructive, and generally inconsiderate parking practices are not acceptable, and:

- parking on a footway or verge either two or four wheels up is inappropriate because it can damage electrical, gas and other services running under, as well as be an obstruction for pedestrians. Drivers tend to consider obstruction of a carriageway for other vehicles and park on the footway because they rarely consider their vehicle causes an obstruction for pedestrians. Additionally, driving on a footway is an offence enforceable by the police.*
- some kerb-space management regulations apply from the centreline of the carriageway to the highway boundary, which is typically the boundary of the adjacent property. Such regulations include 'No waiting' (yellow line) regulations and drivers risk receiving a parking fine should they choose to park on the footway or verge 'behind' such regulations.*

- *parking on verges during wet weather will damage the verge and dirty the highway making it unsafe for all highway users, and the churned verge will be increasingly unsightly and detract from the pleasantness of the street-scene."*

Please note, some regulations apply to the carriageway part of the highway only, therefore CPE cannot be administered for footways and verges in these scenarios, or where there are no kerb-space management regulations at all.

- (f) CEOs patrol and start an 'observation period' within their patrol system. The parking management software system available to the officers on their hand-held devices reminds them of the observation so they can patrol again to ensure the vehicle has been moved. A PCN is served if the vehicle remains on the regulated area in contravention of the rules of the Blue Badge Scheme exemptions.
- (g) Yes. ESC's Parking Services team and officers from Suffolk Police liaise as and when necessary. Suffolk Police with SCC and all the districts discussed web content and 'contact centre scripts' enabling callers to be assisted appropriately. There have regrettably been a few instances where callers have received inaccurate information, but the necessary parties are working together to resolve such errors.
- (h) Ten working days. This is ESC's stated response time for all its services.

Q2: Carers parking in residents' only areas (Paragraph 5.2)

Cllr Beavan

Carers have been using Covid-19 passes in areas that do not yet have a parking scheme.

- (a) What will replace these passes when they are discontinued?
- (b) Will a resident be able to use a residents parking space for carers rather than their own use?

A2:

- (a) All drivers, including those delivering care in the community, must park their vehicles in accordance with highway law. However, paragraphs 4.4 and 4.5 of the Scrutiny report provides the options for registered carers when administering care in residential streets with 'Permit holder only' regulations for the benefit of residents (resident permit schemes). Members will note that permits are available for carers at a price of just £8 per year. Further information is available via the 'Permits, exemptions and dispensations' web page available via www.eastsuffolk.gov.uk/parking.
- (b) Residents may choose to use their Visitor Voucher allocation for any vehicle visiting their residence; however, the 'Health and social care permit' is the appropriate parking solution for carers.

Q3: General*Cllr Beavan*

Disabled bays and residents' parking would greatly improve the lives of elderly and disabled residents, especially in holiday towns. This would allow them to access the sensible measures that have been introduced by ESC.

- (a) Can the process of designation of bays and schemes be speeded up and acted upon by ESC before the end of 2021?

This is a mammoth task to sort out parking in our District.

- (b) Would it be better for the Cabinet to invest more resources to set up this system, rather than fire-fighting problems as they arise?

Cllr Gooch

- (c) RING-GO: how was this contract awarded as a tendering process? I ask only because I wish to understand how large this 'market' is and why this App?

- (d) Fines and appeals: how many have cited a failure to be able to use the App or a failure in their technology/ownership of mobile phones?

- (e) Comparable towns and outlying districts by size and selling points - was any kind of study made of e.g. Great Yarmouth, Paignton, Bridlington etc., to ascertain how parking works in these areas to arrive at a more equitable model?

- (f) Covid-19 and the rejuvenation of the 'high street': will parking costs be revisited given the extreme economic pressure that retailers will be under during the next year?

Cllr Deacon

- (g) I firmly believe that there should be a "root and branch" review of all on street parking restrictions across the District, double, single yellow lines, and limited parking areas. May I please hear the Parking Management team's views?

A3:

- (a) Kerb-space management schemes were scheduled to be progressed from Autumn 2020. Resources will need to be allowed time to carry out the work on making these changes.
- (b) The highway authority has chosen to manage many streets forming the highway network in many areas, including towns. Achieving compliance of the regulations has taken and continues to take priority via the Parking Services team comprising twenty-eight officers. There is only one officer with the skills and experience to design kerb-space management schemes and write Traffic Regulation Orders (TROs), and some of his time will be allocated to scheme development.
- (c) A number of factors were considered when selecting the Ringo system. ESC was already in contract with Ringo, and the termination period in the contract was eighteen months. CPE administration was to commence within that period and it was necessary to have a 'cashless' option as part of the roll out of the programme. Options for testing the market were considered, including procurement Frameworks, however, given the length of time required to exit the RingGo contract, it was appropriate to work in partnership with the supplier to deliver the best possible service. That said, RingGo:
- provides intelligent integrated mobility services;
 - uses a mobile phone app providing parking and electric vehicle charging services and is developing usage for in-vehicle technology in preparation for autonomous vehicles;
 - operates in approximately 500 towns and cities with more than 17 million registered users (70 million worldwide);
 - operates with open application programming interface (API) providing longevity of solution with the Council's other operating systems; and
 - has re-configured all tariffs efficiently and effectively, provided social media images, more than 300 zone code signs, and a number of machine covers to assist in raising the profile of the cashless parking service.

Whilst there are many benefits in partnering with RingGo at this time, the service will be reviewed and the market re-tested to ensure the Council's cashless parking service remains efficient and effective in service delivery.

- (d) None. It is worth remembering the CEOs also use mobile phone technology in the same locations to be able to enforce; and the pay-and-display machines also use the mobile phone networks to communicate with central servers. Other officers have also tested the RingGo service, and there was nearly 145,000 successful parking transactions during June, July, August and September.
- (e) A formal comparison was not carried out in this way, partly because of the diversity of types of town in East Suffolk. Anecdotally, however, we do know that parking in East Suffolk represents good value in comparison with other towns – for example, the cost of seafront parking in Great Yarmouth starts at £4, regardless of the length of session. The cost of an hour's parking in East Suffolk is less than £1 per hour, taken as an average.

- (f) No. with reference to paragraphs 3.4 and 3.5 of the Scrutiny report, the fees are set in the contexts of revitalising town centres and parking management. The offer of the trip attractor remains the reason for the visit and not the offer of 'free-parking'; although there is much free-parking in many towns already. As above – parking in East Suffolk, at an average cost of less than £1 per hour, represents good value, and more so since Cabinet agreed on the introduction of a free half hour parking session in the majority of Town Centre car parks.
- (g) It is acknowledged that some kerb-space parking does not 'balance parking demand' for all users, but these are small in number. Anyone may request a review of TRO installations with the Highway Authority, but an area by area review is the most efficient way to conduct reviews. The table below details those areas with more than twenty regulated streets, and strategic reviews could be undertaken once Members have accepted the CPE operation thus far.

Zone	No. of streets
LOWESTOFT	327
FELIXSTOWE	286
BECCLES	65
WOODBIDGE	51
SOUTHWOLD	47
LEISTON	40
BUNGAY	39
ALDEBURGH	36
SAXMUNDHAM	28
HALESWORTH	25
FRAMLINGHAM	24
MELTON	22

Q4: Customer service/service improvement/promotion of car parks

Cllr Green

- (a) I have requested that the East Suffolk Council website includes a Glossary of Terms and FAQs for CPE. I have made this request at CPE briefings for Councillors (two), at a Full Council meeting and to Councillor Norman Brooks when he provided a transport briefing at a scrutiny meeting. When will this be available on the website, please?

- (b) Also, is there confirmation that all our car parks are on Google Maps and that any information has been reviewed and/or updated?

A4:

- (a) Suffolk was one of the last Counties nationally to adopt CPE. ESC has benefitted from nearly 30-years of experience and technology in the implementation of its CPE administration service. Advantage is taken from linking ESC's web pages to those of the Department for Transport (DfT), the British Parking Association (BPA), Parking and Traffic Regulations Outside London (PATROL), and others. ESC's pages point to: the [BPA](#) website for information and videos about the PCN process; [PATROL](#)'s website and its [FAQs](#) for CPE; and SCC's website which provides FAQs on its '[Parking enforcement and regulations](#)' page. We will review the layout of the webpage to make sure that the FAQs have greater prominence.
- (b) RingGo service has a mapping feature through which drivers can navigate to the Council's car parks, and more than 15,000 across the country; and the 'Parking places' web page has a link to 'Find my nearest' via which all the Council's designated parking places can be seen.

Q5: Signage and charges

Cllr Cloke

- (a) Nethergate Street car park is supposed to be a charged car park now. The notices are up, but no machine. What is happening here?
- (b) Priory Lane has two car parks, one on either side of the road – why is there only one machine? People who park in the disabled bays on the north side cannot buy a ticket unless they walk (or get back in the car and drive – which may not be easy) to the other side of the road. Can this be rectified?
- (c) The notices displayed are very small print, I have been told people do not find the charges clear. When the cash machine is not working, people do not want to use RING GO - it is not clear there is no charge for this (and I understand some people have been charged – for paying and for getting a reminder text). Can this be clearer to read and for users to action?
- (d) The increase in charges for an annual ticket, from £150 to £650 is really very high and a shock for those who subscribe. I do not dispute £650 is value for money, but it is a huge increase all at once. Will this charge be revised downwards and a more graduated rise be introduced? How can the differential between the annual on street residents' parking of £50 vs £650 for a car park be justified?

- (e) The free half hour parking is available just once a day. Parents cannot deliver their children to and collect from St Edmund's Primary School without paying potentially £5 per week - I do not think many parents can afford this. What is the solution? Many people do not understand there is no free half hour in Scales Street which there is in the other car parks – again the information is not clear. Can this be rectified? The response at paragraph 5.3 of the report does not adequately address this. I understand there is a need to keep traffic moving and to stop people 'nipping out' every 30 minutes to put on a free ticket, but surely there is a better way to help parents?

A5:

- (a) A machine is to be moved from another location and this work is scheduled to take place in the coming weeks. The machine is already upgraded with an alphanumeric keypad and the applicable tariff will be sent to it via the mobile phone network once it is moved.
- (b) Priory Lane is one off-street parking place and its total size requires only one machine for the reasons detailed in paragraphs 4.10 and 4.12 of the February 2020 Cabinet report referred to in paragraphs 3.1 to 3.7 of the Scrutiny report.
- (c) The new signing is much simplified and clearer. Appendix A of the Scrutiny report shows a typical installation of the three 'standard' sign types.
Image 1 of this appendix is the ticket fees and the digital screen with instructions, and these are the same as is widely used elsewhere in the Country and considered to be clear.
The cash machines are robust and while they do occasionally go wrong or may be vandalised, such occasions are rare. In such circumstances drivers can use RingGo as a backup. They can of course choose not to, but this will mean that they will need to park elsewhere if they are to avoid a PCN.
Image 2 of this appendix shows the RingGo sign clearly states "Optional reminder texts cost 10p each." These can be set accordingly from the 'Account' tab within the RingGo app by selecting 'Notifications'. Image 3 illustrates.
- (d) The pricing of resident's permits is calculated differently to the pricing of a season ticket, and to a large extent, the two ticket types serve a different purpose. Paragraph 5.1 of the Scrutiny report discusses this, and the travel demand element should be noted, and paragraph 5.5 provides specific information in answer to this question.
- (e) The council has provided a free half hour ticket for most town centre car parks, and parents dropping children off at school can take advantage of this. The difficulty is how to configure this for a specific group of users (such as parents at school X) and specific car parks. It would be difficult – probably impossible in practise – to restrict the use of the two half hour slots to this individual group, without it becoming general practise that in one car park, two half hour slots are available. If this occurred, then other locations may well ask for the same relaxation of the regulation. We will monitor and review.

Image 1: Pay-and-display machine tariff insert and digital screen display

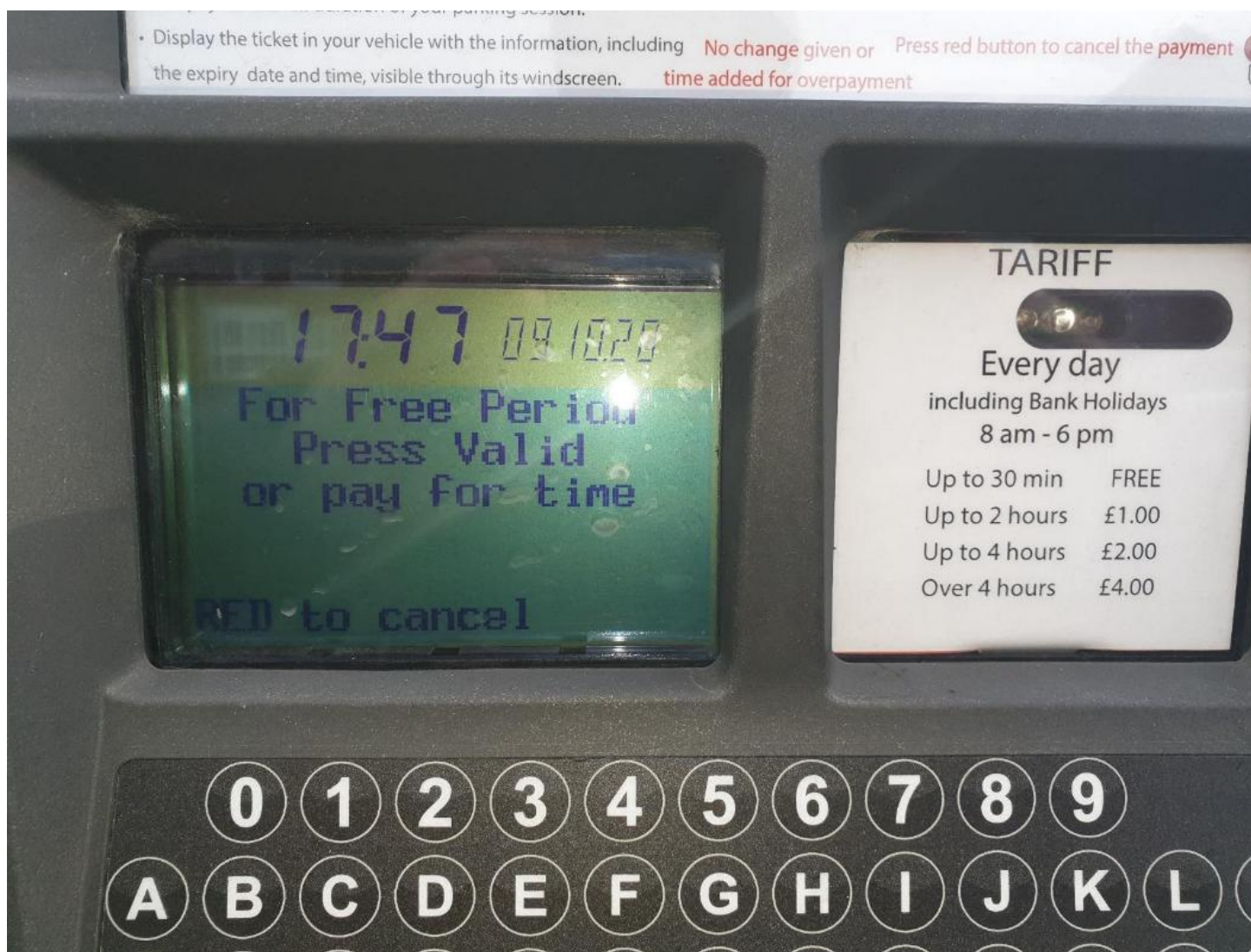


Image 2: RingGo sign



Image 3: RingGo app – Account - Notifications

16:26 46%

← My parking notifications

SMS

Booking successful
An SMS confirming that your parking session has started.

Off On

Parking expires soon
No need to watch the clock.
Get an SMS reminder 10 minutes before your session expires.

Off On

Session stopped
An SMS confirmation that your parking has stopped successfully (Start/Stop locations only).

Off On

If enabled, SMS fees apply to each transaction.

For the appropriate parking tariff, and any convenience fee or SMS reminder fees, please visit <https://m.myRingGo.com/parkinglocator>.

Email

☐ VAT receipts

Save