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28 October 2015

## City of Edinburgh Council, draft *Parking Action Plan* ... response from Spokes

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We are grateful for the opportunity to comment on the draft plan.

### 1. Response in Summary

We recognise that on-street parking is taken for granted by many people in our current car dominated society. However such parking always introduces additional safety risk for cyclists as field of view is restricted, manoeuvres round parked vehicles are necessary and there is a danger of “dooring.” The Action Plan is right to say (page 7) that the Council should “*keep cycle lanes clear to protect cyclists and encourage more people to cycle*” but it should be recognised that all kerbside parking brings additional risks for cycling.

We welcome the Council's efforts to reduce car dependence and recognise that important progress is being achieved in this regard. We also recognise that many of the actions proposed in the Plan are useful in shifting travel choices to safer and more sustainable travel modes but we are concerned that some actions proposed will have contrary outcomes and will encourage more car use. This would be very concerning given the Council's own target in the Local Transport Strategy to *reduce car modal share* for all journeys from 43% in 2009 to just 31% by 2020, and for work journeys from 42% to 29%.

Finally, the action plan should address additional parking-related issues :

- reduction over time in on-street parking in the city as sustainable travel becomes more popular as planned by the Council,
- improved parking enforcement to reduce offending and improve road safety conditions
- further parking & loading restrictions to improve cyclist safety at specific locations, notably at and near traffic islands

## 2. Comments on the Plan's actions

**Action 5 – Publish information to demonstrate openness and commitment to customer service.** Spokes would like to see the publishing of statistics to indicate the effectiveness of parking regulations introduced as part of this action. This would also link with action 41 (monitor Plan implementation) and would consist of indicators such as -

- no. of reports from the public asking for parking enforcement action to be taken and follow up action taken
- no. of cases where fines were raised for breaches of parking regulations
- no. of cases where vehicles broke regulations but enforcement action was not completed for whatever reason.

**Action 6 and 7– Evening and Sunday Parking restrictions** - We very strongly support these proposals. Edinburgh is becoming a 24/7 city, and kerbside parking and blocking of cycle lanes is a real problem for cyclists. We fully endorse the document's own strong wording that on Sundays, "*almost all on-road cycle facilities (are) rendered useless by parked cars.*" The proposals will make car choice a less attractive option, and will reduce the volume of driving and on-street parking, all of which cause increased accident risk, particularly to vulnerable road users such as cyclists. The evening restrictions should continue as late as possible into the evening – indeed, the aim should be for all cycle lanes to be car-free 24/7 so that they can fulfil their entire purpose.

**Action 8 – Shared Use Parking Spaces** – We can see that this proposal may have some advantage if drivers do not need to search around so much for a parking space. However increased driver convenience will result in more driving and more on-street parking in the city centre. We therefore oppose this measure. If it was being introduced along with a long term plan to reduce the overall volume of on-street parking we might have a different view.

**Action 9 – This action about parking pricing is very broad in its scope** - There are three actions Spokes would like to see progressed to achieve sustainable transport objectives -

- make 9 hour parking charges prohibitive in order to de-incentivise this travel choice
- modify the Park Green system to discourage the use of diesel cars through higher residents permit prices. This is in the light of recent news stories indicating that diesel engines have much higher levels of toxic emissions than previously believed.
- We also support graduated charging (action 27) and would like it used to ramp up penalties for persistent offenders (e.g. a Leith Walk pizza delivery firm might be such a case)

**Action 10 – improve the attractiveness of car clubs** - Spokes supports this action.

**Action 12 – Better management of limited waiting parking places** - We would like such parking to be removed if it is not meeting sustainable travel outcomes.

**Action 13 – Parking Charges on Greenways** - It seems illogical to be thinking about new parking which is only likely to give rise to more driving and less attractive and safe roads for pedestrians and cyclists. To provide an attractive and safer cycling environment, we would like to see existing greenway parking removed and no new greenway parking created.

**Action 18 – Protocol for issuing permits to residents of private streets** - Spokes thinks the Council policy should be that they will only be granted in exceptional circumstances.

**Action 19 – Protocol for establishing Electric vehicle charge point spaces** - Spokes asks that any such spaces are located where they present no safety issue or inconvenience to cyclists or pedestrians.

**Action 20 – Greatly increase the area where visitors permits can be used** - Spokes strongly opposes this proposal. It will allow most city centre residents to buy up to 150 permits a year (300 for a couple), will increase the convenience of car use and will make it the easier choice in many circumstances. As an end result it will increase car use and vehicle emissions, and will make Edinburgh's roads less safe.

We recognise that there may be a case for visitor permits for certain needs. For example to support mobility impaired citizens or to enable tradesmen access when undertaking work, but we think general visitors should need to pay general parking charges if visiting by car. We believe residents of the city centre accept this and will look upon it as one of the disadvantages to count alongside the many benefits of their home location. The maximum number of permits which can be applied for to enable building work (vans only) per household per annum should be no more than sixty. For permits for use alongside blue badges we recommend careful assessment but do not propose specific limits.

**Action 24 – Encourage good standards for off road car parks** - Spokes does not support an increase in total parking capacity but if the Council can get car users parked off rather than on-street we would be supportive.

**Actions 27 and 28** – Spokes supports exploring **graduated parking charges** and the Council support for the **Double/Footway Parking Bill**.

**Action 32 – Introduce new 24 hour parking restrictions in the CPZ** - Spokes strongly supports this proposal to provide improved protection for the benefit of actual and potential pedestrians and cyclists, but it should apply citywide rather than restricted to the CPZ. Our comments in *Additional Actions Needed in the Plan* (below) propose specific actions that could fall within this action.

**Action 33 – Review and Upgrade provision for cyclists** - We strongly support this action, which should have a high priority. Parking in cycle lanes should be much more restricted in future, to prevent the dangers of moving in and out of traffic streams, dooring, and restricted vision, particularly around junctions. We emphasise that kerbside parking, both illegal and legal, and particularly in cycle lanes, is one of the biggest problems reported to Spokes by our members. As stated under Action 6 (above) the aim should be for all cycle lanes to be free of cars 24/7. Furthermore, physical segregation should be considered as part of a review of all cycle lanes, with mandatory lanes where physical segregation is not yet possible, whether for financial or other reasons.

**Action 41 – Monitor Plan implementation** - As stated at action 5, Spokes would like to see measures of effectiveness of parking restrictions to be developed and published.

### **3. Additional Actions Needed in the Plan**

The Plan needs strengthened in several areas to make it more effective in achieving higher levels of sustainable travel in the city and the Council's own LTS targets to reduce motor vehicle use.

**3.1 Reductions in the total quantity of on-street parking** – The Council is planning for greater use of active travel and public transport use by Edinburgh citizens and has targets for substantially reduced motor traffic modal share. In line with this, the Council should be setting target reduction levels for on-street parking in the CPZ to help create a more attractive environment generally and one that is more appealing and less off-putting to potential and existing walkers and cyclist. Note too that where there is no on-street parking at all, the problem of cars circulating looking for free spaces is removed, thus removing significant car intrusion.

**3.2 Improvements in enforcement** – Our perception is that there is too much parking in Edinburgh that breaches regulations yet goes unchecked. Sometimes this is in the same place on a regular/ semi-regular basis , but it also includes a significant amount of one-off offending on prominent streets. Therefore the level of monitoring and enforcement is insufficient and should be increased.

A related factor that should be explored is higher levels of fine for breaching regulations ,to improve their deterrent effect. For example, doubling of basic fines should be considered, together with further increases for repeat offenders.

An increased risk of accidents for traffic, particularly cyclists, is cause by a lack of enforcement of parking, waiting and/or loading at many locations across the city. As city centre examples we point to

- the junction of East Market Street and Jeffrey St where double yellows do not prevent regular blue badge parking or vehicles waiting, despite the junction requiring a right turn and ahead lane; and
- the junction of the High St and Cockburn St where the double yellows do not deter vehicles from regularly being present and obscuring access to and from the High St.

These and other such sites should be established as no parking waiting or loading, and fully enforced.

Less a safety concern for cyclists but certainly one for pedestrians is the apparent abandonment of the pedestrian area at the foot of Castle St. It now regularly has parked vehicles and no apparent enforcement. Action needs taken such that vehicles are only there to meet exceptional needs.

**3.3 Further parking & loading restrictions to improve cyclist safety at specific locations, notably at and near traffic islands** - Parking in advance of, adjacent to and following traffic islands creates a considerable increase in actual and perceived crash risk for cyclists. Transport Scotland's *Cycling by Design* document says that traffic islands should allow a 4-metre road width on either side of the road both adjacent and in the run up to allow safe overtaking by vehicles of cyclists. This space is not available in examples at Dalry Road and Comiston Road which we refer to below, where parking can reduce available roadwidth. Accordingly, new parking or loading restrictions should be provided.

At many of the traffic islands on Comiston Road, one side of the road or the other has no protection from parking so in effect the crossings can be blocked by parked cars. This is of course a problem for pedestrians but for cyclists too. Several of our members have raised with us the problem of cyclists (and particularly slower and novice cyclists) being forced to merge into the same traffic stream as 40MPH motor traffic if they need to move out to pass parked cars approaching, next to and following traffic islands. It would improve safety greatly if no-parking restrictions were in place here (and around other city traffic islands) ideally at a distance of at least 10 metres each side. In the particular case of Comiston Road, speed reduction is also vital.

In the CPZ on Dalry Road outside Bensons bar, loading is the problem. The loading area partially covers the crossing point and creates a pinch point at the traffic island, whilst loading immediately after the island again forces the cyclist out into a traffic stream which itself has been keeping left for the island. The loading bay should move to Downfield Place to create a safe pedestrian and cycling environment.

Finally, we stress that the Comiston and Dalry Road cases listed above will be amongst many examples across the city. An analysis of all central islands for such dangers should be undertaken by the Council.