

## **6b Consultations**

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### **o Purpose of Report**

The purpose of this report is to inform members of recent publications and consultation papers of interest and to agree a response where appropriate.

### **o Consultations**

#### **❖ Private Member's Bill to establish 20mph as the default speed limit on residential streets**

Mark Ruskell MSP is consulting on a Private Members Bill to change the default speed limit in built up areas across Scotland from 30mph to 20mph.

The consultation is available online at the following link:

<http://www.smartsurvey.co.uk/s/20mphSpeedLimits/>

Mr Ruskell argues that 20mph speed limits reduce traffic speed making our streets safer, healthier and cleaner in areas to live, work and play. The consultation is based on the premise that reducing speed cuts accidents and saves lives, while encouraging walking and cycling and lowering air pollution.

Currently, there is an incomplete patchwork of 20mph zones across Scotland as the process for creating discrete 20mph zones remains costly and time-consuming for councils. It is suggested that Councils could keep some streets with higher speed limits in consultation with communities, but the proposal is that these would be the exception rather than the rule.

There are differing opinions on the effectiveness of a blanket speed limit and issues to be addressed in terms of costs and enforcement. It is suggested that it may be more appropriate for individuals to respond rather than for Nestrans to formulate a formal response and it is therefore recommended that Board members respond on an individual basis if they wish to do so.

The consultation runs from 15 May 2017 to 7 August 2017.

#### **❖ Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities**

The UK Government, the Scottish Government, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland are seeking views on a revised Plan to reduce levels of nitrogen dioxide around roads within the shortest possible time - the most immediate air quality challenge. This consultation applies to England, Scotland, Wales and Northern Ireland. It includes the consultation document; the draft UK Air Quality Plan for tackling nitrogen dioxide; and the Technical Report, which includes details of the modelling techniques and assumptions used in the draft Plan. The Government

is committed to build a stronger economy and a fairer society. A cleaner, healthier environment benefits people and the economy. Clean air is essential for making sure that the UK is a healthy and prosperous country for people to live and work.

Responses were sought by 15 June and an officers' response was therefore submitted to comply with that deadline. The response is attached as Appendix A to this report and members are recommended to endorse the content of the response.

#### ❖ **Cairngorms National Park Local Development Plan 2020: Pre-MIR Consultation**

The Cairngorms National Park Authority (CNPA) has started the process of preparing its next Local Development Plan (LDP). This new LDP will direct development within the Cairngorms National Park for the period 2020-2025 and into the longer term. It will replace the existing Cairngorms National Park LDP, which will remain in place until 2020. The CNPA are seeking views regarding the main issues that should be taken into consideration in the LDP ahead of publishing the Main Issue Report for public consultation later this year.

As the closing date for the consultation was 16 June 2017, Nestrans has responded to the consultation in the letter attached as Appendix B.

#### ❖ **Aberdeen City Council Consultation: Strategic Car Parking Review**

Aberdeen City Council has commissioned a Strategic Car Parking Review of Aberdeen City. Aecom are carrying out this work and during May invited comments from stakeholders on:

1. The role of car parking as part of a package of travel demand management measures;
2. Location and quality of car parking; and
3. Role of emerging technologies in parking.

The deadline for comments was 26<sup>th</sup> May 2017 and so Nestrans has prepared and submitted a response which is provided in Appendix C.

#### ❖ **Transport Scotland Consultation: Improving Parking in Scotland**

Since obtaining powers in the Scotland Act 2016, the Scottish Government is undertaking a detailed review of parking in Scotland. The consultation paper focuses on a number of key issues and due to the complex nature of parking, it provides an opportunity to explore how parking is managed across the country. The four key issues covered by this consultation are:

- Parking on the pavement / footway;
- Parking at dropped kerbs;
- Enforcement of disabled persons' parking places; and
- Parking for ultra-low emissions vehicles.

The full consultation paper can be found on Transport Scotland's website at <https://www.transport.gov.scot/our-approach/industry-guidance/parking/>.

The consultation paper sets out a range of questions on these issues and Nestrans' proposed response to these is provided in Appendix D. The initial deadline for responses has now been extended to 31 August after lobbying by local authorities, who need more time to formulate and agree responses.

## ❖ **HiTRans Regional Transport Strategy Refresh**

HITRANS has published its draft updated Regional Transport Strategy for an 8 week period of consultation. This follows consultation on a Main Issues Report in May 2016 to which Nestrans submitted a response.

Although there is an online survey, we do not have significant comments to make on the strategy and have therefore drafted a letter in response highlighting our support for the draft strategy and requesting minor amendments to the referencing of the A96 dualling between Aberdeen and Inverness and the Aberdeen to Inverness rail improvements.

The consultation closes on Friday 5<sup>th</sup> July and a draft response can be found in Appendix E for approval.

### ○ **Recommendations**

It is recommended that the Board:

1. Note the consultation on the Private Members' Bill regarding establishing 20mph as the default speed limit and agree that members should make individual responses if they so wish;
2. Endorse the officers' response to the consultation on the National Plan for Improving Air Quality attached as Appendix A;
3. Note the response to the Cairngorms National Park LDP consultation in Appendix B;
4. Note the response to the consultants preparing Aberdeen's Strategic Car Parking Review at Appendix C;
5. Consider the draft response to the Scottish Government's consultation on Improving Parking and approve the attached Appendix D as Nestrans' response;
6. Consider the draft response to HITRANS on their draft Regional Transport Strategy and approve the attached Appendix E as Nestrans' response.

RD/KW/KC 14 June 2017

## Appendix A

### Nestrans' Response to "Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities"

submitted online 6<sup>th</sup> June 2017

#### Introduction

##### 1 What is your name?

Name: Kelly Wiltshire

##### 2 What is your email address?

Email: [kwiltshire@nestrans.org.uk](mailto:kwiltshire@nestrans.org.uk)

##### 3 Are you responding as an individual or an organisation?

Organisation

##### 4 If you are responding as an organisation please provide the name and nature of your organisation.

Name of organisation: Nestrans

Other type of organisation: Other public sector organisation (Regional Transport Partnership)

##### 5 Which region are you based in?

Location: Scotland

##### 6 Would you like your response to be confidential?

No

##### 7 How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

Neither satisfied nor dissatisfied

##### 8 What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it? What factors should local authorities consider when assessing impacts on businesses?

Please provide your views: We are based in Scotland, so cannot comment on Local Authorities in England.

##### 9 How can government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them? Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects. How can government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives. How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

Please provide your views: Aberdeen which is one of the areas we cover, has three air quality management zones. Transport is seen as one of the key issues contributing

to this pollution. Measures which would make vehicles cleaner and produce less emissions would help to mitigate this problem. For example help to retrofit vehicles to Euro 6. Mitigation schemes would need to be done through a grant system/approved supplier and managed by an appropriate organisation. Also reducing congestion and improving traffic flow would also help, for example encouraging active travel for short journeys. Encouraging the use of smaller, cleaner vehicles and vans to make the 'last mile' deliveries into the city centre. This would help meet the Regional Transport Strategy of "A transport system for the north east of Scotland which enables a more economically competitive, sustainable and socially inclusive society".

**10 How best can governments work with local communities to monitor local interventions and evaluate their impact?**

**Please provide your views:**

Air Quality monitoring is important to understand what and where the problem is. If local communities are involved in this, through schools, communities groups etc, then they may feel more inclined to also help solve the issues. For example children helping to monitor air quality outside schools, might encourage parents not to drive their children to school.

**11 Which vehicles should be prioritised for government-funded retrofit schemes?**

**Please provide your views:** The North East Scotland Regional Transport Strategy supports the use of public transport and as such support for buses and coaches to be modified would be welcome. Due to the oil and gas economic downturn in the North East of Scotland any support that would help local businesses remain competitive, whilst helping to reduce emissions would also be encouraged. Aberdeen City Council has been supporting Hydrogen fuel cell buses and there are two Hydrogen fueling stations in Aberdeen.

**12 What type of environmental and other information should be made available to help consumers choose which cars to buy?**

**Please provide your views:** Consumers need to be aware of the whole life costs of their vehicles not just the initial purchase cost. So running costs of electric vehicles etc should be promoted. Consumers also need to be aware that it is not just carbon dioxide that they need to be aware of, but other emissions for example from diesel and the public health implications of these emissions.

**13 How could the Government further support innovative technological solutions and localised measures to improve air quality?**

**Please provide your views:** Support for encouraging more alternative fuelled vehicles such as electric vehicles and their supporting infrastructure. Localised measures. Support for active travel such as walking and cycling and the supporting infrastructure.

**14 Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?**

**Please provide your comments:** No.

**Consultee Feedback on the Online Survey**

**15 Overall, how satisfied are you with our online consultation tool?**

Satisfied

## Response to Cairngorms National Park Local Development Plan Consultation:

David Berry  
Planning Manager (Forward Planning & Service Improvement)  
Cairngorms National Park Authority  
14 The Square  
Grantown-on-Spey  
PH26 3HG

Our Ref: NL/N12/7  
Your Ref:

30<sup>th</sup> May 2017

Dear David

### **Cairngorms National Park – Local Development Plan Main Issues Report**

Many thanks for your letter of 19<sup>th</sup> May inviting us to provide comment on the main issues for the proposed Local Development Plan for the Cairngorms National Park. As the Regional Transport Partnership for the North East we have a keen interest in issues relating to the National Park and the area of Aberdeenshire that falls within it.

I have provided a response to each of the questions you posed in the paragraphs below:

#### **Do you agree these are the main issues that the new Cairngorms National Park LDP should seek to address?**

Broadly we do agree with the issues provided within the document, particularly with regards to placemaking being the centre of the LDP. Transport is identified specifically as a Main Issue in relation to the A9 and rail upgrades however we believe this is integral to many of the issues identified.

#### **Are there any other issues you think the MIR should include?**

In terms of Nestrans' role as a Regional Transport Partnership for the North East, we feel it is important to consider the impact of development on the transport network and the implications for accessibility and encouraging greater use of public transport, cycling and walking, particularly within the consideration of the six qualities of placemaking. Additionally consideration for the transport network, especially with regards to sustainable transport, should be made for new developments planned within the LDP under the headings of spatial strategy for development and settlement-based issues.

Under the heading developer contributions we feel that travel should be noted as an area where specific information regarding obligations needs to be considered. This should take account of not only public transport but also walking and cycling.

The Nestrans Regional Transport Strategy sets out the overarching objectives for transport in the region and should be taken into consideration in terms of the development of the Cairngorms National Park LDP. Also of relevance is the Nestrans Active Travel Action Plan

which identifies the Deeside Way, which extends from Aberdeen to Braemar, as one of nine strategic walking and cycling routes. The purpose of identifying and developing a strategic network of active travel routes is to provide attractive and safe routes for cyclists and pedestrians for both long and short distances and to cater for a wide range of journey purposes.

As well as identifying a strategic network, this action plan aims to ensure that:

- The needs of pedestrians and cyclists are considered first and integrated into the planning and design of all new developments and infrastructure;
- Businesses and other organisations, including schools and public sector organisations, do their part to support and encourage cycling and walking;
- Provision of new cycle and pedestrian infrastructure meets desired standards;
- Cycle training is available to all children across the region; and
- New infrastructure and initiatives are supported by appropriate information and promotion to encourage a change in attitudes and behaviour.

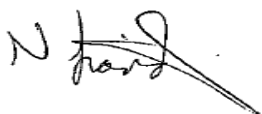
Both the Regional Transport Strategy and the Active Travel Action Plan can be found on the Nestrans website at <http://www.nestrans.org.uk/regional-transport-strategy-refresh-1.html> and <http://www.nestrans.org.uk/active-travel-action-plan.html>.

**Are there any issues we have identified that you don't think should be included as main issues in the MIR?**

The issues included seem appropriate and we are broadly supportive of them. There is nothing that we believe should not be included.

I hope that the above comments are useful and thank you again for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N Laird', with a long horizontal stroke extending to the right.

*Nicola Laird*  
*Transport Officer*

26<sup>th</sup> May 2017

Our Ref: KC/N13/10

Your Ref:

Andrew Robb  
Senior Consultant  
AECOM Limited  
1<sup>st</sup> Floor East  
22 Centurion Court  
Aberdeen  
AB11 5QH

Dear Andrew

### o **Strategic Car Parking Review for Aberdeen City**

Thank you for the opportunity to contribute to the development of Aberdeen City Council's Strategic Car Parking Review. As I am sure you are already aware, Nestrans published its Regional Parking Strategy in 2012 and this sets the policy framework under which actions can be delivered at a local level that ensure provision, management and control of parking in both Aberdeen City and Aberdeenshire works towards and supports the wider objectives of the Regional and Local Transport Strategies. The objectives and policies contained within the Regional Parking Strategy remain relevant and in line with the objectives of the wider Regional Transport Strategy. The Regional Parking Strategy can be found at [http://www.nestrans.org.uk/db\\_docs/docs/Regional\\_Parking\\_Strategy\\_FINAL.pdf](http://www.nestrans.org.uk/db_docs/docs/Regional_Parking_Strategy_FINAL.pdf)

The points below provide a response in turn to the three topics identified in your letter.

#### **1. The role of car parking as part of a package of travel demand management measures.**

The role that parking provision and management plays in supporting the delivery of other strands of the Regional and Local Transport Strategies is significant, in particular in encouraging increased use of public transport services (including park and ride), improving air quality, access to services and economic growth. Although one of a number of influencing factors, there is an opportunity for parking policy to better support delivery in these areas. The attached flow chart is taken from the Nestrans Regional Parking Strategy and illustrates the cause and effect of parking related issues.

The provision and management of parking needs to form a key part of any package of measures to manage the demand for car travel, particularly in the city centre and demand management is key to being able to allocate more space to pedestrians, cyclists and public transport which in turn is key to ensuring the vitality of the city centre. The success of park and ride facilities in particular is made significantly more challenging without parking policies that make it less attractive to park in the city centre. Park and Ride usage in Aberdeen has been declining in recent years and with the recent opening of the A96 Craibstone park and ride, it is vital that the provision and management of parking in the city centre supports its success.

One of the two objectives of the Nestrans Regional Parking Strategy is "*to support and influence increases in the proportion of journeys undertaken by sustainable modes, particularly bus and rail*", specifically recognising the role that parking has to play in



managing demand for car travel. The objectives of the Strategic Car Parking Review, as set out in the consultation document, are very much in line with the Regional Parking Strategy and the Regional Transport Strategy and therefore supported by Nestrans.

## **2. Location and quality of car parking.**

Currently off-street parking is provided in a variety of locations across the city centre area, often in relatively small car parks rather than large multi-storey car parks. The Council should consider working towards achieving a quality standard such as Park Mark across its car parks to enhance the quality of provision and feelings of safety and security of car park users. In terms of their location, it will be important to retain off-street parking provision in different parts of the city centre in order to support the vitality of different areas of the city (the west end for example). Centralising parking provision into one location may cause wider issues in terms of congestion on the approaches and access to car parks at peak times. The demand for parking at Union Square, although a privately run car park, illustrates the issues that can occur on the wider road network as a result of large numbers of vehicles trying to access one main car park.

## **3. Role of emerging technologies in parking.**

The Regional Parking Strategy recognises that there are significant opportunities to encourage the take up and use of low emissions vehicles through parking management and incentives such as provision of electric vehicle charging points and discounted parking charges.

There is also a role for technology in providing information to car drivers at the start of or during their journey into the city to inform their mode choice, encourage them to use park and ride or direct them to the most appropriate car park. Consideration should also be given to the potential of more innovative uses of technology such as dynamic parking charges that adjust based on congestion and availability of parking, such as has been trialed in cities in America.

The enforcement of parking restrictions is a challenge for local authorities and consideration could be given to the role that technology can play in this in order to ensure that parking restrictions are appropriately enforced and effective.

Nestrans is supportive of the work that Aberdeen City Council is undertaking in relation to the Strategic Car Parking Review and if you require any further information in relation to the comments provided above, please do not hesitate to get in touch.

Yours sincerely



Kirsty Chalmers  
Transport Executive (Strategy & Delivery)

**RESPONSE TO SCOTTISH GOVERNMENT CONSULTATION ON IMPROVING PARKING**

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**General**

**Q 1. Do you think parking, including on pavement, at dropped kerbs and double parking is a problem in your area?**

Yes.

- **If yes, how have you, your family or friends been affected by parking problems?**

A key issue for Nestrans is the priority that pavement parking gives to cars over active and sustainable modes (cycling and walking) and the equalities impacts (particularly on people with mobility issues or suffering from a disability, such as wheelchair users or people with visual impairments) when footways and cycleways are blocked forcing people onto the road or blocking their way altogether.

- **Where did this occur (e.g. type of street or area) and how often?**

In Aberdeen City, pavement parking has been a particular problem in some business areas and industrial areas. The Council has already taken action and enforced a ban on pavement parking in some areas (for example the North Dee business area). This has however had the side effect of increasing instances of double parking in some instances and displacement of parking to surrounding areas.

Anecdotally, pavement parking is also a problem in residential areas where parking is limited and in town centres and local shopping areas where delivery vans often mount the pavement when stopping for short periods to make deliveries.

**Legislation**

**Q 2. Why do you think the motorists may choose to pavement park?**

It is thought that many drivers believe that they are causing less disruption by parking partly on the footway than by parking wholly on the carriageway. This common perception is however focussed on the culture of priorities which puts the movement of traffic and car drivers above the needs of cyclists and pedestrians and those with mobility difficulties or visual impairments or any other impairment that makes it more difficult to navigate roads and footway.

The legislation is unclear regarding pavement parking and due to a lack of enforcement it is generally seen as acceptable in some areas.

In housing areas with limited parking provision, residents may have very few alternatives within the local area.

**Q 3. Do you think new legislation is needed?**

Yes

- **If yes, what areas of the law need to be amended?**

Yes, new legislation is required to make it illegal to park on a footway rather than the current situation where it is illegal to drive onto a footway. As stated within the consultation, the legislation around parking enforcement is complex and should be clarified.

By default parking on a footway or cycleway should be an offence, subject to specified exceptions.

Any legislation should be very clear in terms of definition. Although pavement is a term used by the public, and this consultation also refers to pavement any legislation should refer to the section alongside roads for pedestrian, the correct term of footway.

Any new legislation should also be extended to include cycleways.

**Q 4. If a new law is required, should it cover all roads with footways, including private roads that are not adopted by local authorities and trunk roads?**

Yes – the Road Traffic Regulation Act 1984 applies to all roads so there is no reason why related provisions should not have the same coverage.

Legislation should also be extended to cover cycleways, where these are shared use paths, adjacent to the footway or segregated from the footway and carriageway.

- **If not, why not?**

**Q 5. Do you think any new law should apply to all vehicles (e.g. HGVs, vans, taxis, cars, motorbikes, etc.)?**

It should certainly apply to HGVs, vans, taxis and cars.

- **If not, which type of vehicles should the law not apply to?**

Exemptions could perhaps apply to motorbikes if there is sufficient room and they would not be causing an obstruction.

Bicycles should not be covered by this legislation.

**Q 6. Do you think there should be exemptions applied to allow pavement parking to take place, particularly due to local concerns about access for vehicles and lack of alternative parking provision?**

Yes.

- **If yes, what should those exemptions be?**

It should be left up to the local authority to determine appropriate exemptions based on local circumstances. Councils will have to weigh up the potential impacts of displaced parking on

local communities resulting from the banning of pavement parking. In some areas where parking is limited, there may be a requirement to provide additional off-street parking to accommodate cars previously parked on pavements and this will come at a cost.

In some areas pavements may be deemed sufficiently wide to accommodate parking and pedestrian access.

There is a potentially negative impact on bus services if cars previously parked on pavements are now parked on street if these vehicles now impede access for buses (particularly residential areas with narrow streets). This also applies to access for emergency and refuse vehicles.

There should be an exemption to permit loading or unloading where it could not have been satisfactorily performed if the vehicle had not been parked on the footway. This would be the same exemption as currently exists in relation to the existing prohibition on the parking of HGVs on footways. There should be guidance indicating that this exemption would only apply if the carriageway would otherwise be completely blocked or significantly obstructed.

There should however be clear guidance as to the circumstances under which exemptions should and should not be allowed to ensure that the needs of pedestrians and cyclists are seen as a priority.

- **If no, why not? (Please be as specific as possible)**

## **Implementation & Enforcement**

### **Q 7. Should there be consistent approach to parking enforcement across Scotland?**

Yes, there should be a certain level of consistency across Scotland in relation to the rules and signage governing parking.

- **If yes, how should this be taken forward?**

The Scottish Government should publish guidance on how all authorities with parking enforcement powers should exercise these powers. This guidance should apply equally to all authorities with enforcement powers, including local authorities with DPE powers and Police Scotland.

Although different authorities have different enforcement regimes, there should be consistency in what is enforced.

There should be guidance on signage to ensure consistency for the public across the country.

There will also be an important role for the Scottish Government in awareness raising and promotion of the implications of any changes. The Government should commit resources to publicising changes and towards achieving the culture shift mentioned above, whereby drivers currently appear to feel that obstructing a pavement is preferable to parking in the roadway.

**Q 8. Local authorities in some parts of Scotland have DPE powers and are responsible for parking enforcement. In other areas Police Scotland retains responsibility.**

- **What is your view on rolling out Decriminalised Parking Enforcement regimes across Scotland?**

Local authorities should retain the ability to choose whether or not it is appropriate to apply for DPE powers in their area.

- **What is your view about the proposal to share services to provide some access to a “traffic warden service” in areas without DPE?**

There should be no barrier to councils with DPE sharing services in relation to parking enforcement.

- **What should Police Scotland’s involvement be in future?**

Police Scotland should continue to carry out its duty to enforce parking legislation in areas where DPE has not been applied. This should be done in accordance with new Scottish Government guidelines, applicable to all authorities with parking enforcement powers, to ensure consistency.

At present it is for individual local authorities to decide if DPE is in the best interest of the area. Those local authorities that have not done so already are predominately those that will have the most difficulty in making the business case to demonstrate viability.

The consultation document states that Aberdeenshire Council is actively working towards DPE however this is not currently the case.

If Police Scotland are no longer able to resource the enforcement of parking in areas without DPE, consideration will need to be given to an alternative enforcement regime to ensure effective implementation of any new legislation (as well as the requirements of existing parking legislation).

**Q 9. Currently moving traffic violations are a matter for the police, however, do you think local authorities should be able use CCTV and/or Automatic Number Plate Recognition (ANPR) systems for enforcement of:**

Yes. Although currently a matter for the Police, limited resources often means that there is not the resource available within the Police to monitor and enforce a significant proportion of moving traffic offences. In addition to safety, moving traffic offences such as blocking of yellow box junctions and undertaking banned turns can have significant negative impacts on the overall road network, particularly in congested areas, also impacting on bus punctuality and safety. The ability to monitor and enforce particular problem areas or junctions could help local authorities to better manage the road network for the benefit of all.

Local authorities should also be enabled to enforce other parking offences through ANPR / CCTV, for example at park and ride sites which have a limited length of stay. This would enable local authorities to utilise the benefits of technology to ensure that park and ride sites are used for their intended purpose and not as long stay car parks.

- **Parking in areas where safety benefits can be delivered to all road users, around schools for example?**

See above

- **Some moving vehicle contraventions like banned turns?**

See above

- **If not, why not? (Please be as specific as possible)**

### **Traffic Regulation Orders (TROs)**

**Q 10. Do you think it is a good idea in principle to allow local authorities to exempt specific streets or areas from national restrictions for pavement parking?**

Yes. Some exemptions will have to be allowed (see Q6 above)

- **If so, what is the best mechanism for doing this (e.g. TRO or other form of local resolution)?**

When considering the best mechanism, regard should be had for the resource implications that this will have for local authorities who will be required to assess all parts of their area for the impact of removing pavement parking, assessing alternatives, provision of alternative parking if necessary and assessing the requirements and scope of any exemptions.

### **Displacement of vehicles**

**Q 11. Do you think controlling pavement, dropped kerbs and double parking could have unintended or negative consequences in your area?**

Yes.

- **If so, what would the effects be?**

If there were no provision for local authorities to make exemption orders, parking could become difficult or impossible in some locations.

The costs to local authorities of implementing new legislations (see above)

The need to provide alternative parking provision could result in the loss of green spaces or other amenities in local areas if they are given over to parking.

There could be an impact on local bus services in areas where pavement parking is currently prevalent. If cars are to be parked on-street this could cause increasing obstructions to buses or make some routes impassable for buses resulting in the removal of services from such areas.

- **Who would be affected?**

Local communities and bus passengers

Residents in streets with inadequate parking provision.

- **What type of street or area would experience these consequences?**

Housing areas with narrow streets and little or no off-street parking provision. Many of these date from a time when car ownership was the exception rather than the norm.

Controlled parking could lead to pressure to provide off-street parking particularly in dense housing areas. This parking would be unlikely to attract parking charges so would require new funding and in most locations land is not available to provide such parking. In some instances, this could potentially result in a loss of green space or amenity in order to provide parking.

### **Town Centre Regeneration**

**Q 12. Do you think controls on parking are likely to increase or reduce the costs and impact on businesses in town centres?**

Restrictions on footway parking could make it more difficult for businesses to receive deliveries.

- **If yes, what should we be doing to reduce any impact on businesses in town centres?**

Some exemptions may need to apply in order to allow deliveries and loading.

- **What other arrangements should be considered to deliver parking improvements that help support town centre regeneration?**

### **Disabled Parking Bays**

**Q 13. Do you think that on-street disabled persons' parking places are being enforced in your area?**

Aberdeen has DPE and disabled parking is enforced through the City Wardens team. In Aberdeenshire this is not enforced to any great extent since Police Scotland withdrew their traffic warden service.

- **If not, how could this be done better?**

This would be a matter for the local authorities.

- **Do you think members of the public should report misuse where it is observed?**

We do not have any comments to make on this issue.

**Q 14. Have you witnessed misuse of a disabled persons' parking space?**

Not applicable.

- **If so, did you report it?**

We do not have any comments to make on this issue.

- **If not, did anything prevent you from reporting it?**

We do not have any comments to make on this issue.

- **Should disabled persons' parking places be enforceable at all times?**

We do not have any comments to make on this issue.

- **Do you think the level of penalty for misuse of local authority disabled persons' parking space is acceptable?**

We do not have any comments to make on this issue.

- **If not, what level would you consider to be acceptable?**

We do not have any comments to make on this issue.

**Q 15. Do you think off-street disabled persons' parking spaces, including private car parks, are being enforced in your area?**

- **If not, how could this be done better?**

We do not have any comments to make on this issue.

**Q 16. What impact do you think disabled persons' parking space misuse has on Blue Badge holders?**

High levels of misuse could result in mistrust of the system and may make it more difficult for genuine blue badge holders to obtain and use a space.

**Emissions Vehicles**

**Q 17. Are you supportive of local authorities' trialling or introducing parking incentives (such as discounted, free or preferential parking) for ULEVs?**

- **If yes, what should these incentives be?**

The Nestrans Regional Parking Strategy contains a policy to support work to consider the benefits and feasibility of applying differential parking charges to reflect the impact of larger and more polluting vehicles.

There are significant opportunities to encourage the take up and use of low emission vehicles through parking management and incentives such as discounted parking charges. In Aberdeen City, this policy is supported through the City Council's Air Quality Action Plan



2011 which identifies that car parking policies have the potential to have a significant air quality impact.

- **If no, why not?**

**Q 18. Are you supportive of local authorities trialling or introducing specific measures to help people who, live in flats or tenements (with no dedicated-off street parking) charge their vehicles?**

- **If yes, what should these incentives be?**

Nestrans would be supportive of exploring measures to facilitate the use of electric vehicles for as many people as possible and would look to work with local authorities on this.

- **If not, why not?**

**Q 19. Do you think the use of ULEV-only charging bays should be monitored and enforced by local authorities?**

- **If yes, please say why.**

Yes – where they are provided in public car parks they should be monitored and enforced by local authorities. Private facilities should be monitored and enforced by their owners.

- **If no, how should they be enforced and who should be responsible for this enforcement?**

### **Assessing Impact**

**Q 20. Are there any likely impacts the proposals contained within this consultation may have on particular groups of people, with reference to the ‘protected characteristics’ listed above? Please be as specific as possible.**

The primary purpose of removing footway parking should be to ensure safe and unobstructed movement for pedestrians and cyclists and to reduce barriers to travel for all, including many of the protected characteristics but particularly those with mobility difficulties, visual impairments, young children in pushchairs and those with more hidden difficulties such as those suffering from dementia.

In instances where the footway is blocked by a parked vehicle, pedestrians are forced onto the road and to mix with general traffic, or are unable to pass altogether. This creates a significant social disadvantage to those affected.

Any misuse of dedicated parking spaces for disabled persons leads to a reduction in the availability of such spaces and this could reduce the access to shops, services etc this would be detrimental to those with a disability.

**Q 21. Apart from safety, are there any other aspects of a child's rights or wellbeing that you think might be affected either positively or negatively by the proposals covered in this consultation?**

As well as an immediate impact on safety by forcing pedestrians (including children) onto the road in order to pass vehicles parked on the pavement, there are also wider impacts on perceptions of the safety of an area for pedestrians which may impact on parent's willingness to allow children to travel alone or without supervision. This could have a significant impact on the ability of children to access play, education and other facilities.

**Q 22. Do you think the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.**

There will be significant resource implications for local authorities in having to assess parking and pavements across their whole area to judge the potential impact of banning pavement parking. There are potential resource and financial implications of having to potentially provide additional off-street parking in areas where parking is already limited.

There will also be increases in the costs and resources required for enforcement. In places where DPE is in place there will potentially be an income generated from increased enforcement however for areas without DPE this responsibility will fall to Police Scotland.

Unless there are suitable exemptions, there could be additional burdens placed on those making or receiving deliveries and those undertaking works in or adjacent to footways.

There is also a potential impact on local councillors if there is an increase in constituency matters and disputes arising due to parking issues. Particularly in areas where alternative parking is limited.

**Q 23. Are there any likely impacts the proposals contained in this consultation may have upon the privacy of individuals? Please be as specific as possible.**

We do not have any comments to make on this issue.

**Q 24. Are there any likely impacts the proposals contained in this consultation may have upon the environment? Please be as specific as possible.**

If the proposals were to reduce damage to footways caused by overrunning vehicles, this would have a positive impact on the environment owing to the reduced requirement of new materials for repairs.

Greater take up of ULEV's which additional parking provision should facilitate, would lead to carbon reduction and air quality improvements.

### **Conclusion**

**Q 25. Do you have any other comments that you would like to make, relevant to the subject of this consultation that you have not covered in your answers to the previous questions?**

Related to parking on footways, consideration should also be given to the impact of temporary road signs that are often placed on footways during utilities works, diversions or road closures. In many cases these signs can block the footway, having the same impact for pedestrians as a parked car.

## Appendix E

Neil MacRae  
Partnership Manager  
HITRANS

Our Ref: KC/N6/1  
Your Ref:

15<sup>th</sup> June 2017

Dear Neil

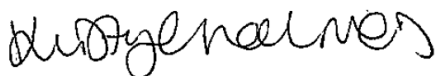
### **HITRANS Regional Transport Strategy - Consultation**

Thank you for the opportunity to comment on the HITRANS draft Regional Transport Strategy. Nestrans is fully supportive of the vision and objectives that are set out in the strategy and will work with Hitrans, where relevant in order to achieve these.

Of specific interest to Nestrans are the references to the dualling of the A96 between Aberdeen and Inverness and the Aberdeen to Inverness rail improvements which are detailed under the heading 'Committed Projects' on page 35. In relation to the dualling of the A96, Nestrans would welcome reference to the benefits that this project will have for public transport and active travel users as well as car travel – as is the case for the A9 dualling referenced above. Similarly, references to the Aberdeen to Inverness rail improvements should be referenced in similar detail to the Highland Mainline improvements in terms of the benefits this significant improvement is anticipated to bring.

Thank you again for the opportunity to comment.

Yours sincerely,



Kirsty Chalmers  
Transport Executive (Strategy & Delivery)