16/09/2024

North Berwick Parking Management TRO, Asset and Regulatory Manager, Road Services, Penston House, Macmerry **EH33 1EX**

parkingconsultations@eastlothian.gov.uk

Dear Recipient,

I am writing on behalf of Gullane Area Community Council (GACC) to raise our concerns and objections to the proposed parking restrictions within the town of North Berwick (our neighbouring community council area and key focal town for many of our local population/residents).

This letter relates to and makes reference to the terms of The Local Authorities' Traffic Orders (Procedure) (Scotland) Regulations 1999 proposals that East Lothian Council (ELC) would like to introduce:

- THE EAST LOTHIAN COUNCIL (NORTH BERWICK) (OFF STREET PARKING PLACES) ORDER No: 1
- THE EAST LOTHIAN COUNCIL (NORTH BERWICK HAUGH ROAD and SEWAGE WORKS) (OFF STREET PARKING PLACES) ORDER No: 2
- THE EAST LOTHIAN COUNCIL (NORTH BERWICK) (COMMUNITY CENTRE & LIBRARY PARKING PLACES) ORDER No: 3
- THE EAST LOTHIAN COUNCIL (VARIOUS ROADS NORTH BERWICK) (PROHIBITION & RESTRICTION ON WAITING, LOADING & UNLOADING ETC), ORDER No: 4

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Recognising that ELC has had Decriminalised Parking Enforcement (DPE) regimes in the area since 2017 and an income figure that reached £509k from parking charges in 2023 it is disingenuous to state that East Lothian differs from other local authority areas around the country https://www.transport.gov.scot/media/xiklqrdv/decriminalised-parking-enforcement-income-and-expenditure-2022-to-2023.pdf). It is easy to recognise that pay & display income is a viable income stream for the Local Authority and this is the conclusion that we have reached – this is an opportunity for ELC to income generate.

This conclusion is based on the reality that a portion of the current parking charge income remains unspent (£193k/24%) despite coastal infrastructure projects taking place. This is not an insignificant sum. Therefore, reassurance that funding raised from the proposed schemes has not been fully satisfied. Given that driving associations have identified that this is an increasing trend within local authorities in England (https://researchbriefings.files.parliament.uk/documents/CBP-8736/CBP-8736.pdf), it is easy to identify why there are anxieties around this.

According to multiple findings it is highly likely that a 'decrease in footfall in retail spaces due to a lack of parking capacity' will occur, particularly as potential visitors choose to visit other areas of East Lothian where parking is free of charge. Furthermore, this is another example of increasing costs/taxing those that are financially challenged and living within East Lothian potentially preventing them from experiencing some of their own county. This does not align with 'East Lothian's Plan' including being 'fair'. Therefore, should parking charges be implemented we are recommending that parking is made free of charge for those living locally i.e. within either the North Berwick Coastal Area Partnership or East Lothian as a whole.

It is clear from assessments already carried out that 'parking strategies cannot simply be about restricting parking. They need to meet the best interests of road users, communities and businesses. Inappropriate parking rules, over-zealous enforcement and high parking charges drive people out of town centres, push up the cost of living, harm local shops and make it harder for people to park responsibly and go about their everyday lives'

(https://assets.publishing.service.gov.uk/media/5a7514cc40f0b6397f35d851/150305 -

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Guidance on Parking Reviews FINAL.pdf). This is evidenced by the recent change in Kirkcaldy (https://www.fifetoday.co.uk/news/transport/parking-charges-to-bescrapped-for-part-of-kirkcaldy-high-street-in-new-pilot-project-4679462).

The proposal provided by ELC fails to make clear how or what additional infrastructure will be developed to meet the needs of the local community. For example, given the limited bus services that do not stretch across the entire coastal area - what additional services are going to be provided?

There is also no recognition that parking issues within North Berwick are a seasonal issue, not all year round. This has not been addressed.

Finally, and we think most importantly, ELC has failed to listen to the local population and as a result does not have their support as evidenced by the first consultation on the matter resulting in 659 objections and Kenny Miller's more recent public comments https://www.eastlothiancourier.com/news/24567346.north-berwick-parking-chargesblatant-money-making-scheme/.

Please consider this letter a formal objection to the proposed parking restrictions in North Berwick as outlined above. Should you wish to discuss further do not hesitate to contact me.

Warm regards,

Malcolm Duck

Chair of the Gullane Area Community Council

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