

Appendix 2 – Summary of objections received – the 258 objections have not been included in the report pack but the table below provides a summary of all points raised.

	Objection	ABC Response
1.	What the income was to be used for?	Parking charges will be used to support infrastructure maintenance, including roads and car park maintenance.
2.	<p>That the daily rate for parking is unaffordable over a year (£9x365 = 3,285).</p> <p>The parking charges would add to the already high cost of living and working on an island, including for low paid seasonal work.</p> <p>Concern was raised around the additional cost in going off island (for example, work, hospital appointments, and holidays) as currently the Craignure Long Stay is used as a free long stay car park.</p> <p>The TRO would remove free parking options and public transport is insufficient to allow alternative travel arrangements.</p> <p>The proposals may lead to an increased demand on vehicle ferry spaces as locals would take their vehicles off island rather than pay for parking.</p> <p>Concerned in regards to the adverse effect on tourism on Iona. Parking charges would increase the cost for visitors, including holiday makers.</p> <p>Note: a number of objectors voiced concerns that the cost of a permit was also unaffordable – see Note 1 below.</p>	<p>The Council offers off-street parking permits, details are available at https://www.argyll-bute.gov.uk/parking-permits. The cost of parking permits is set by the Council each year and are published in the Council Fees & Charges https://www.argyll-bute.gov.uk/sites/default/files/fees_and_charges_schedule_2018-19_v8.pdf. Permits are currently available at the following prices:</p> <ul style="list-style-type: none"> • 3 month £135 • 6 month £250 • 9 month £360 • 12 month £475 <p>While we acknowledge that this proposed TRO will introduce an additional cost to residents and visitors I would note that the cost of an annual permit equates to £1.30 per day. The permits are not restricted to a single car park or area, they may be used in any Council car park within Argyll and Bute.</p>
3.	Requested a cheaper permit for residents.	The Councils on-street resident’s permits (only applicable to on street parking bays) are currently £95 per annum. These are currently only available within Oban, however, I would note that this scheme will be extended to Tobermory if an on street TRO is introduced.
4.	Concern raised that a delay in the ferry	The Council has now introduced a pay-by-phone

	(e.g. cancelled due to storms) would result in a Penalty Charge Notice being issued.	option. The system is called PaySmarti and the detail on how to use the system is available at https://www.argyll-bute.gov.uk/pay-mobile-parking-service . This system allows users to sign up to text alerts and offers a pay by web option as well. Tickets purchased via this service allow users to buy more time if, for example, the time left on a parking ticket is due to expire.
5.	Why charge all year round when the demand is seasonal.	The Council previously agreed to remove seasonal charges from its car parks, this is applicable to all car parks across Argyll and Bute and is ongoing.
6.	Concerns over displacement of vehicles (various locations) caused by the introduction of parking charges.	Within the February 2018 Council Budget meeting, it was also agreed to progress an on street TRO. This TRO will be dealt with separately and will aim to address traffic management issues, including the potential displacement of vehicles. If other issues arise following the introduction of the TROs, further measures will be considered as appropriate.
7.	Concern that continued use of car parks for the Screen Machine will be adversely impacted by the introduction of the TRO.	We currently work with the Screen Machine across Argyll and Bute and will ensure adequate provision is maintained.
8.	No Island impact assessment had been carried out.	Equality and Socio-Economic Impact Assessments (EQSEIA) are carried out in relation to policy proposals which enable the officers who are designing a new proposal to check that they have given due regard to all equalities implications, including socio-economic inequalities, as well as impacts on island communities. Due regard does not mean that there is an obligation to achieve a result. Public bodies are not required to reduce inequalities of outcomes as part of any decision made under the duty. However, the public authority should be able to demonstrate that it has considered options and why a decision has been made. The Scottish Government did not implement Island Community Impact Assessments in October 2018 as expected as part of the Islands Act. To respect the intent of the Act the Council has carried out a further Equalities and Socio-Economic Impact Assessment specifically on this TRO to consider and evidence the impact on the affected island communities of Mull, Iona and Ulva. This now picks up a range of additional issues and some of the positive outcomes that the TRO will provide, including improved facilities for disabled parking.
9.	Loss of the Lorry Park in Craignure.	The Lorry Park is frequently used as a dumping

	Increased cost to commercial entities would be passed on the local residents.	ground for caravans and abandoned cars which is a financial burden to the Council as it has a duty to enforce and remove via environmental legislation. The Council has carried out vehicle manoeuvre checks which confirmed that it is only possible to safely park either one Rigid Vehicle or two LG Rigid Vehicles (these are the two smallest vehicles within the assessment database) within the lorry park. Any larger vehicles would either have to reverse onto the public road or off the public road. Reversing onto the public road may be a road traffic offence. Given its proximity to the ferry slip, it is the view of Council Officers that no such manoeuvres should be permitted at this location due road safety risks; effectively removing its use as a lorry park. It should be noted that the Lorry Park does not have a TRO and it does not appear to have been designed as a lorry park.
10.	Why aren't the Council considering the proposals submitted by the community working group for parking improvement in Tobermory?	The proposals submitted by the community were considered and a full response was provided to the group.
11.	That the reasons given within the Statement of Reasons didn't apply to all car parks.	The Statement of Reasons is a generalised summary of the purpose of the TRO for the whole island. Each point made in the Statement of Reasons does not necessarily apply to every car park but the priority is to ensure that the Council manage its asset and contribute to the maintenance of the roads and car parking infrastructure. The proposed TRO will, however, safeguard disabled parking across all the car parks by formalising the disabled bays, including enforcement, while also permitting Blue Badge Holders to park for free in any bay.
12.	Concern that the cost of implementing the TRO (meters, enforcement, signs etc.) would outweigh the income derived from parking charges. That the introduction of the TRO would not manage demand for parking.	The introduction of pay & display charges to currently free car parks will allow the Council to employ a warden based on the island. The income raised from pay & display tickets will also contribute towards car park improvements on the island (e.g. resurfacing where required, refreshed bay markings, better signage). Pay & display charges typically encourage better turnover of vehicles within bays, effectively creating more available bays without having to build physical infrastructure (new car parks).
13.	The proposals make no allowance for motorhomes or campervans.	The off-street draft TRO does not permit camper vans or motorhomes to park in Ledaig Car Park at any time. The proposed on-street TRO will also

	That the TRO could cause displacement of motorhomes and campervans to the Main Street, Tobermory.	prohibit parking by camper vans and motorhomes. The proposed on-street TRO is still being developed, however, if pay & display parking is introduced residents parking permits will be made available at an appropriate rate.
14.	It is unfair to charge for parking when the car parks are in poor condition.	I can confirm that resurfacing works are programmed for Fionnphort (Columba) Car Park within the current financial year. Additional works are proposed at the Lorry Park at Craignure which will help to improve the standard of these car parks.
15.	Cost of permits are unaffordable. Cost of parking charges are too high. Can locals permits be provided at a reduced rate? How are free periods assessed?	Parking charges and the cost of permits are set by the Council each year and are published in the Council Fees & Charges https://www.argyll-bute.gov.uk/sites/default/files/fees_and_charges_schedule_2018-19_v8.pdf . Across all Council car parks in Argyll and Bute the tariffs are the same. Any additional permit type, for example free resident permits, or change in tariffs would need to be approved by full Council. Any free period of parking is typically based on need, for example providing an hour or two to visit a local shop. Each car park is assessed on an individual basis.
16.	Why are coaches allowed to park for free and that it was unfair that locals would have to pay for parking while coach companies would be able to park for free.	Currently there is no charge or proposed charge for buses or coaches within Mull off street car parks. As a general rule on Mull, the coaches are tourist coaches, resulting in less vehicles and minimising the impact on infrastructure and demand for parking.
17.	The introduction of parking charges to the Columba Centre Car Park would result in an increased number of vehicles accessing Iona.	Permits for vehicular access to Iona are issued by the Council. I would advise that no relaxation of the Iona TRO rules is being considered in relation to the proposed off-street TRO.
18.	No prior consultaion undertaken with local community groups.	I can advise that Mull Community Council submitted a Community Participation Request in 2017. On the 22 February 2018 the Outcome Improvement Process Document was issued to the group and contained actions for both the Council and Mull & Iona based local organisations. Many of the proposals within the document have been taken forward within the draft TRO.
19.	Concerned that businesses and tradespeople with vans would be unable to park within the car parks and that this may	Within the draft TRO the definition of a motor car is "a mechanically propelled vehicle, not being a motor tractor, a motor cycle or an invalid carriage,

	prevent their continued operation on Mull.	<p>which is constructed itself to carry a load or passengers and the weight of which unladen-</p> <p>(a) if it is constructed solely for the carriage of passengers and their effects and is adapted to carry not more than seven passengers exclusive of the driver does not exceed 3050 kg;</p> <p>(b) if it is constructed for the use of conveyance of goods or burden of any description, does not exceed 3050 kg;</p> <p>(c) does not exceed 2540 kg in a case falling within neither of the foregoing paragraphs;”.</p> <p>This vehicle category would include vans similar to, for example, some short wheel base vans typically used by contractors and therefore this type of use will be able to continue unhindered.</p>
20.	That, even with the TRO in place, enforcement from off-island staff would be ineffective and costly.	<p>The current pay & display car parks and other on-street restriction are enforced by Oban based staff at the moment. The employment of a warden on the island will reduce the demand for support from Oban staff.</p> <p>Active enforcement doesn't necessarily mean that a warden will be in attendance in every car park every day; this is true across the whole Council area. The potential for enforcement is typically enough to deter non-payment of parking charges.</p>
21.	The TRO would prevent commercial transferring of goods within the car parks – concern was principally in regard to Craignure car parks/lorry park.	I would advise that under the Council's parking rules across Argyll and Bute it is not permitted for any business to be carried out within the extent of its car parks without the written consent of the Council.
22.	The introduction of the TRO would have a detrimental impact on events taking place on the island that currently make use of the off-street car parks.	The introduction of car parking charges does preclude the use Council car parks for events. In most cases there will be a charge for this, normally the full cost of each bay per day for the duration of the event. Where charges are waived, this requires approval by either the Policy & Resources Committee or the full Council.