

RESIDENTS' PARKING SCHEMES

FEEDBACK ANALYSIS ON RESPONSES TO CONSULTATION ON PROPOSALS TO INTRODUCE RESIDENTS' PARKING SCHEMES IN NORTHERN IRELAND



An Agency within the Department for

**Regional
Development**

www.drdni.gov.uk



Contents

Table of Responses

Appendix A - Listing of Respondents

General Policy Issues

No.	Comment/Question	Raised By	Response
1	"We have no comments to make on the proposals"	2C	Noted
2	"I strongly support 24-hour residents' parking provision, for which £80 a year seems little enough to pay."	3R	Noted
3	"Ambulance Service or Staff are not listed in the definitions"	5C	A definition is included in the legal definitions in each Residents' Parking Order. It is not required in the Policy document.
4	"...emergency services such as Ambulance Service are not included in Health Carers Permits"	5C	Ambulance Service vehicles will be exempt from the requirement to display a permit provided they are actively engaged in carrying out their statutory duty. See para 1.8.1c of the consultation document.
5	"it would be helpful to draw attention to the need for emergency and non-emergency patient service vehicles to be parked as near as possible to the source of need."	5C	Emergency and non-emergency patient vehicles will be exempt from the requirement to display a permit provided they are actively engaged in carrying out their statutory duty. The location of available space within any scheme cannot however be predicted and therefore no provision can be made within the policy. A degree of local goodwill should facilitate this desire. It should also be remembered that once the commuter parking has been removed the opportunity to park will be greatly increased.
6	"It needs to be confirmed if a resident can park their car outside their home indefinitely particularly the incapacitated who cannot leave their homes."	5C	Residents may park their cars outside their homes indefinitely within Residents' Parking Schemes provided they display a valid permit and the vehicle is in all other respects legally entitled to be kept on a public road.
7	"Councillors are particularly concerned that such schemes do not always work well and that they may well have an adverse impact on local businesses, tourism and social interaction."	6L	There is considerable demand for Residents Parking in many areas in NI. As part of the policy development process and following completion of the consultation, Roads Service officials visited a number of operational schemes in GB. These schemes have been welcomed by all affected stakeholder groups.
8	"....wholeheartedly support the implementation of local democracy in areas where such schemes are proposed."	6L	Noted
9	"The application of the stipulations relating to Development Parking Requirements seems illogical and against the best principles of efficient and sustainable land use and the wider intentions of Regional Policies."	10B	The stipulation places the onus on the developer to provide the necessary parking for a new development and recognises that street space is limited. Glasgow operates a similar approach, with theirs being quite a bit more stringent in that any residences developed after 2000 are not eligible for inclusion in a Residents' Parking scheme.
10	"Members noted the proposed charge for parking schemes of £80 per house and agreed that it was essential that this additional facility was not considered as a valuation factor for any property. Similarly there was agreement that the Valuation and Lands Agency should be consulted on the proposed policy."	11C	See response no. 29 in this section from the Valuation and Lands Agency of the Department of Finance and Personnel.
11	I sincerely hope that this measure is not introduced in NI, and hope that other means - other existing means - can be used to encourage city centre workers to abandon their cars and not bring them into the city, to use public transport, and that way rid the community of another set of forms, fines and paperwork - hassle we can all do without.	13R	Given the considerable demand for Residents' Parking in many areas in NI, Roads Service intends to implement these schemes in areas which meet the criteria specified in the policy and where there is strong local support for their introduction. Roads Service will also continue to implement other measures identified local transport plans to encourage the adoption of more sustainable modes of transport.
12	".....excellent idea.....and I would be more than willing to pay the proposed annual fee."	14R	Noted

13	"I think the proposed scheme is a good idea and that the 80 pound fee is acceptable, as long as residents are guaranteed a space.....it's all in the enforcement and how the permits are issued."	15R	While the introduction of Residents' Parking Schemes cannot guarantee the availability of spaces, it should however make parking more readily available. The initial restriction of one permit per residence should improve the opportunity to park closer to home.
14	"We welcome the intention to proceed on the basis of local democratic input into schemes requested by local residents."	19C	Noted
15	"The proposal to permit parking on the footway where streets are narrow and residential density is high needs clarification. Is it intended to reduce the width of footpaths or simply to permit parking on designated stretches of footway."	19C	The layout of some existing streets, particularly where the density of resident parking is high, may mean that we either allow footway parking or restrict parking and lose capacity. Decisions regarding the options for footway parking will be made on a case by case basis. Marking out bays which are part on the footway may well improve the situation where footway parking is already a common occurrence as parking will only be permitted within the boundaries of the marked bays.
16	"Does this [2/3 majority] include streets where less than two thirds of residents have vehicles or a need for a permit. Also could you inform us as to how the results for this 'support' would be gathered."	20R	The 2/3 majority will be based on responses received from all residences and Roads Service will strive to ensure that responses are received from at least 50% of residences. Since those residents who do not own a vehicle may be required to purchase visitors' permits if a scheme were to be introduced, they will be entitled to return a questionnaire which will be taken into account in determining the level of support.
17	"We wish you well in your endeavours and realise the proposals are not plain sailing."	21R	Noted
18	"Members welcomed and agreed with the Policy as one means to control on-street parking, through the issue of parking permits to individual persons or commercial premises for the use of specified vehicles."	22L	Noted
19	"... there is evidence of significant increases in the level of home deliveries resulting from purchases over the internet which raises the question of attitudes of parking enforcement officers to short term parking for the sole purpose of deliveries or collections. Such vehicles should not require a permit."	23B	Paragraph 1.8.1(d) states that vehicles actively engaged in loading or unloading goods will not be required to display a valid permit. This will also be included in the legislation and will allow loading and unloading for limited periods.
20	"Whilst the Council agrees in principle with the policy, it wishes to highlight the need for a review of parking to be undertaken within the City and District. In particular, it is concerned about the provision of alternative parking for those who currently park in resident areas, especially as car parks in many areas appear to be fully utilised."	24L	The provision of alternative parking will not be possible in the majority of cases. However, the restriction on parking could provide the impetus for many to switch to public transport. Roads Service is actively exploring and developing the park & ride concept.
21	"...even if an area has adequate off-street parking, residents car parking should still be considered if the effect of non-resident car parking is to generate significant disamenities (e.g. blocking pavements)."	26R	The policy allows for schemes where there is a limited amount of private off street parking available. It will not, however, cover situations where the majority of residential parking is primarily off-street as it is intended to assist those without alternative arrangements to park in their own street.
22	I note para 1.6.4 on the need to attain a threshold of community support. I agree with this point as a general principle but is the suggested figure of two-thirds too high? I would also point out the potential inequity or unfairness whereby in area with a lot of HMOs the "temporary residents" could vote down a scheme to the detriment of established residents. Should it in fact be "one vote per address/household"?	26R	Only one questionnaire will be issued / taken from each residence including HMOs. There is no definitive guidance in relation to what constitutes a suitable majority in relation to support for a residents' parking scheme. Some Local Authorities in GB use 51% where as others use much higher figures. The two-thirds majority gives a 2 to 1 ratio in support of scheme which Roads Service considers reasonable.

23	"Between 29 December 2006 and mid January 2007 I hand delivered a questionnaire leaflet outlining some of the proposals and asking for comments to about 2000 households in three areas--- Donegall Road near City Hospital, off Sandy Row and in the avenues between Lisburn and Malone Roads. 14 households (representing roughly 40 adults) responded of which 14 per cent gave no clear view for or against residents car parking as proposed, 14 per cent could see both attractions and demerits, 21 per cent were clearly in favour and 50 per cent opposed."	26R	Statistics noted.
24	"The scheme does not seem to apply to those with off-street parking available. However a number of residents in such circumstances have major difficulties in accessing their off-street car parking as sometimes their entrances are blocked..... This aspect of the problem does need to be taken into consideration in any policy."	28L	The policy allows for schemes where there is a limited amount of private off street parking available. It will not, however, cover situations where the majority of residential parking is primarily off-street as it is intended to assist those without alternative arrangements to park in their own street.
25	"I disagree with parking permits.....They give you extra money when the road tax already allows people to park on the road.....If you say that permits will allow people to use parking spaces to reach the shops you are trying to pull a fast one.....If you say you are doing this to improve traffic etc. why are you making me feel I should go out and buy a car just to show sympathy with the people you are trying to get at.....All Government offices have parking.....You have not been elected by anyone so you should not be allowed to make rules for others."	29R	Residents' Parking schemes are to implemented to allow residents to be able to park close to their homes. Schemes in general will be locally led and will only be introduced with local support.
26	"Not all businesses affect parking uniformly. Public houses, hotels and restaurants seriously impact on parking not only during the normal working week but also in the evenings and at weekends."	30V	Generally schemes will operate 8-6 Mon-Fri, but there will be some element of local design. Designs will be sympathetic to local need.
27	"Presumably the possibility of charging non permit holders at particular times is implied within [1.6.7] (a)."	30V	Yes
28	"I would be very supportive of any scheme which would assist the residents of the Avenue."	31R	Noted.
29	DFP, in particular the Valuation and Lands Agency, has considered the above consultation. It is very difficult at this stage to ascertain what effect these schemes will have on the capital value of a domestic property for rating purposes. It is something that will be monitored and maybe taken account of during the next domestic revaluation in 2012.	33C	Noted.
30	"In relation to paragraph 1.6.7 point f , in the draft policy document I would imagine that any scheme introduced would benefit also if it could be operational after 6pm, and /or on a permanent basis, or at very least during University term time, after 6pm..... the scheme that is applied to any given area must in my view, be tailored to the unique parking problems of that area."	34R	Generally schemes will operate 8-6 Mon-Fri, but there will be some element of local design. Designs will be sympathetic to local need.

31	"The Council, in principle, welcomes the consultation document and the proposals contained therein....in order for a scheme to work, residents must be guaranteed priority to park outside their homes....The Council is concerned that schemes could cause disputes between neighbours and asks that they be introduced sensitively and following significant research....The legislation should be reviewed after 2-3 years.....Planning Service should be encouraged to insist that planning applications for public buildings should include adequate car parking facilities for users."	35L	Schemes will be introduced largely in response to public demand. Informal local consultation will be undertaken throughout the process via letter drops, information leaflets and public meetings and formally at the stage of publishing the order.
32	Translink now looks forward to the early implementation of residents parking schemes on the fringes of our city and town centres.... Clarify whether or not it requires 2/3 of the respondents in any consultation exercise or is it the support of 2/3 of the total number of residents....."	36C	The 2/3 majority will be based on responses received from all residences and Roads Service will strive to ensure that responses are received from at least 50% of residences. Since those residents who do not own a vehicle may be required to purchase visitors' permits if a scheme were to be introduced, they will be entitled to return a questionnaire which will be taken into account in determining the level of support.
33	"Permitting partial parking on the footway should be resisted as it is likely to result in confusion with respect to proper enforcement."	36C	Roads Service recognises that partial footway parking is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage what may be an existing situation.
34	In drafting the consultation document was any thought given to the use of graduated charges for residents parking permits based on vehicle Co2 emissions."	36C	Graduated charges related to CO ₂ emissions is recent development coming from G.B. Roads Service will keep abreast of developments but is not proposing to follow suit at present.
35	"An extensive review process should be included in the draft policy to address the lack of previously planned pilot schemes, which could have better informed the current draft policy."	37L	Early schemes will be approached tentatively and Roads Service realise there will be a learning process. Rigorous examination of the procedures has been undertaken and has helped detail our approach.
36	"I support the proposed scheme for residents/businesses/visitors and the appropriate charges and trust that it will be implemented forthwith."	42R	Noted
37	"It is unclear what will be taken into account if a scheme is applied for under b) transportation reasons and we would therefore request clarification on this matter and what will be taken into account in introducing such a scheme.....In areas of high HMO clarification is required regarding parking provision for such accommodation although in some areas there is no question that some control is needed but how this will be regulated and enforced is questionable and requires clarification....Before any scheme is introduced we would require that there is a high level of residential and community support before approval is given to introduce such measures..... There would appear to be no form of appeal to the penalty charge notice and this might place already overburdened residents with financial constraints. As there is no guarantee of entitlement to park under such a scheme the Department should ensure that there is no oversubscribing as this may put off residents from signing up or subscribing to such a scheme in the first place....We support the recognition that essential vehicles do not require permits but clarification may be needed over other non statutory but important service providers."	44V	Schemes generally undertaken for transportation reasons will be directed by the appropriate local transport plan to restrict parking capacity and reduce commuter traffic. HMOs are being treated as one residence. The 2/3 majority and response to public demand are seen as critical to the implementation process. As with all penalty charge notices there is an appeal process, however drivers should not be parking in a Residents' Parking area without a permit. Over subscription defeats the purpose of the scheme - the number of permits is to be restricted to 1.2 per available space based on experience from elsewhere. This experience also indicates that the availability of parking is freed up post scheme implementation. The position with statutory vehicles has been clarified in the policy.

38	"The committee welcomes the range of permits available for visitors, health carers and others... welcomes the flexibility proposed for the issuing of special permits outlined in para1.16.3 which allows for daily visits for family members."	45V	Noted
39	"Has any thought been given to including the Half Fare Smartpass which includes a number of categories that include disabled people as proof of residency."	45V	No address is given on card, however it can be used to confirm identity. The policy has been changed to distinguish between proof of identity and proof of residence.
40	"...concerned about the proposal in para 1.6.14 which allows for parking on footways. Car parking on the footway restricts access for all pedestrians but particularly for older people and disabled people."	45V	Roads Service recognises that partial footway parking is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.
41	"With regard to the proposed scheme application forms and the proposed resident survey forms, Roads Service should ensure that such information is available in other formats that are accessible to residents/applications."	45V	It is RS policy to make information available in other formats on request
42	"No mention is made however of the impact of the proposed policy on new applications by residents for accessible parking bays. Imtac recommends that the new policy doesn't restrict any such applications."	45V	The policy will not restrict the ability to apply for individual accessible parking bays where there is a need.
43	"Pre-scheme surveys should include some assessment of local business needs and opinions."	46L	A regulatory impact assessment will be undertaken for individual schemes to identify the effect on local business. Initially an economic appraisal will be undertaken for each scheme.
44	"The Council requests clarification on the transport factors which may be taken into account when introducing a scheme in a residential area."	47L	Schemes generally undertaken for transportation reasons will be directed by the appropriate local transport plan to restrict parking capacity and reduce commuter traffic.
45	"The two thirds of households threshold referred to in the draft policy appears appropriate."	47L	Noted
46	"The draft policy does not put in place any form of appeal to the penalty charge notice leaving residents who have subscribed to the scheme open to further financial burden if a permit is misplaced."	47L	Permits are to be permanently displayed in a similar manner to a car tax disc and will be issued for a particular vehicle and will have the registration number printed on it. As there will be little need to remove the permit from the car misplacement is unlikely to be a problem however, as with all Penalty Charge Notices, an appeals process exists. Lost permits will be replaced but only in exceptional circumstances.
47	"...when located in an area where a church or school is present the scheme will be more flexible, allowing for longer duration limited waiting (such as two hours in any four). The Council would request clarification on how this element of the scheme will be assessed or enforced and the appropriateness of the extended duration."	47L	Individual scheme designs will be developed to accommodate different local circumstances and designers will need to be aware of different local situations. It is not possible at this stage to provide further clarification as the detail will evolve during development and design of schemes. The development of mixed use schemes ie residents parking combined with pay and display or other forms of limited waiting are possible ways round this.
48	"The Council would also request clarification on the situation regarding football grounds and other sports grounds."	47L	If a RP scheme is in operation at the time then supporters will have to park elsewhere.
49	"The Council also requests clarification on the situation regarding HMOs in a proposed residents parking area."	47L	HMOs, where these exist as a single residence in the Valuation and Lands Agency valuation list, will be treated as one residence for the purposes of the policy.

50	"The schemes will usually be introduced at the request of local residents however, there is a 'side door' for the Department to introduce schemes 'for transportation reasons' under para 1.2.2(b). There are no indications of the criteria or procedures for this type of scheme other than para 1.6.7(d) which refers to the removal of all day parkers from city centre areas. The Department has therefore slipped into the small print, a method for them to introduce a residents parking scheme anywhere, anytime, even if the residents don't want it. We would question if this is an intentional position."	48V	Schemes generally undertaken for transportation reasons will be directed by the appropriate local transport plan to restrict parking capacity and reduce commuter traffic. The Department will only be introducing schemes where a problem exists or where a problem may arise. Given the requirements to consult with residents and their right to object to Residents' Parking Order it is unlikely that schemes will be introduced without local support.
51	"Under para 1.6.14 the document indicates that parking on the footway could be allowed under a scheme if there is otherwise insufficient spaces.....Is it not contradictory to formalise and therefore legalise parking on the footway."	48V	Roads Service recognises that partial footway parking, while not illegal, is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.
52	Under para 1.6.15 the department will not allow a residents parking scheme to be provided by a developer as an alternative to the normally required parking standards. In an area of parking restraint however, as set out in BMAP, it might be quite appropriate. This clause could also be interpreted as requiring a small redevelopment inside a residents' parking zone to provide full car park standards which would clearly not make sense.	48V	There is only a limited amount of space. New developments that increase the numbers of residences per house/building need to be controlled. The stipulation places the onus on the developer to provide the necessary parking for a new development and recognises that street space is limited. Glasgow takes a similar if more stringent approach in that any residences re-developed after 2000 are not eligible for inclusion in a Residents' Parking scheme.
53	"We would propose that 'shared surfaces' should be classified as a 'free zone'. These areas cannot be identified as either roads or footways which would make it difficult to designate parking areas within this design."	50V	It is intended that shared surfaces, while being designated parking places for the purpose of the legislation, will not have bay markings.
54	"We would also propose that every house would get the front of the property converted to a driveway to facilitate residents own parking area."	50V	Roads Service is only responsible for the public road and cannot therefore provide personal driveways.
55	Para 1.24 "If adequate parking space is not available the residents would not expect to pay for something that cannot be guaranteed."	50V	Parking Spaces cannot be guaranteed. But schemes will greatly improve the opportunity to park.
56	Para 1.65 "We require more information regarding this point in particular; (a) will the schools and churches have to pay for parking? (b) what time limits will be imposed for this?"	50V	Two possible alternatives exist, either limited waiting which is free or pay and display for which the parker will have to pay. The intention is that for pay and display the charge for the first few hours will be set at a low level to accommodate short term parking but this will rise to deter longer term parking.
57	Para 1.66 "Who will be responsible for monitoring mixed parking in area, i.e. usage of bays and parking meters?"	50V	This will be the responsibility of Traffic Attendants operating on behalf of Roads Service.
58	"Historically there has been a lack of presence of parking attendants in the residential area of Donegall Pass, instead attention has always been directed at the main thoroughfare. How in future will this problem be managed and how often?"	50V	The intention is that Residents' Parking Scheme areas will be included within the beats of the traffic attendants will therefore normally be visited once a day every day the scheme is in operation.
59	Para 1.6.14 "Residents would strongly object to partial parking on footpaths and would remain opposed to this for safety or equality reasons."	50V	Roads Service recognises that partial footway parking is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.
60	"It would appear that a greater emphasis is being put on the provisions to accommodate business owners rather than residents in the area."	50V	The policy has been developed primarily to take account of the interests of residents.

61	"In the Scheme Development Questionnaire, why has Sunday been excluded and why is pavement parking not stated for consideration."	50V	In general, parking problems emanating from commuter traffic are reduced on Sundays. However, scheme design and operating times will be tailored to best meet the needs of the area. Roads Service recognises that partial footway parking, while not illegal, is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.
62	Para 6.2.1 "Permits should be based on how many car owners reside in the house and not limited to two."	50V	Kerb space is limited and providing for unlimited demand would ultimately negate any positive impact a scheme may have. The initial restriction will therefore still apply.
63	"The Council broadly welcomes the proposals for the introduction of residents' parking schemes where they are necessary, where they are the best means of resolving parking conflict and have the support of the local residential community. The Council would highlight however the need to ensure other issues are addressed to ensure a comprehensive and wide ranging response to the issue of parking conflict. In particular, the Council would highlight the need for public transport improvements, the provision of adequate public car parking facilities to serve city and town centres and other traffic generators and the implementation / enforcement of Green Travel Plans"	51L	Noted - however, these issues largely fall outside of the scope of the Residents' Parking policy.
64	Para 1.6.4: "The Council note the recommendation that schemes should have two thirds support of local communities. The Council considers that this should be an absolute minimum requirement and that any public consultation exercise should be widespread and communicate clearly why it is considered that a scheme is needed and what benefits would be associated with it."	51L	Two-thirds support gives a 2 to 1 majority in support of a scheme and is considered reasonable. Consultation with residents will be on-going throughout the scheme development process and residents be provided with ample information about Residents' Parking Schemes in the form of letter drops, information leaflets etc.
65	Para 1.6.5: "The Council, whilst supportive of the need to minimise disruptions to church and school life, highlights the need for operational clarity in relation to the suggested methods of ensuring this, particularly when a specific scheme may involve a mixture of permits, limited waiting periods, special permits etc".	51L	Individual scheme designs will be developed to accommodate different local circumstances and designers will need to be aware of different local situations. The need to minimise the impact on residents will be an important consideration. Residents and businesses of an area will be fully informed of scheme design throughout the process.
66	Para 1.6.7: "The Council considers, in relation to point f) that schemes, whilst limited potentially to certain days / times of day, should not be implemented seasonally or for special events, rather they should be permanent year-long operations."	51L	Part (f) provides flexibility to ensure the best use is made of road space throughout the year. While it would be difficult to rule out seasonal schemes, it is envisaged that these will be the exception rather than the rule.
67	Paragraphs 1.6.12.1 – 1.6.12.2: "The Council note the thresholds identified in relation to scheme identification but highlight that the opinions of the local community need to be considered irrespective of the 'triggering' of thresholds."	51L	Local consultation will be conducted throughout process. Where there is considerable opposition a scheme will be unlikely to proceed.
68	Paragraph 1.6.14: "The Council highlight the need for extreme care to be taken when consideration is given to allowing for parking on the kerbside. In such instances Council considers that parking should, in the first instance, be provided to residents."	51L	Generally footway parking is being explored to provide a facility for residents within an overall Residents' Parking Scheme. Roads Service recognises that partial footway parking is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.

69	Paragraph 1.20: "The Council requests that in relation to appeals that an independent oversight appellant body be established in relation to parking offices. The Council would suggest that a mixture of transport professionals and lay people compose any independent appeals panel."	51L	An independent appeal process is already in place in relation to parking contraventions that attract a penalty charge notice (PCN). As part of a three stage process an appellant can appeal to an independent adjudicator. This service, which uses qualified legal professionals, has been set up by the Northern Ireland Court Service and is totally independent of DRD. Given that the non-issue of a permit is a procedural issue rather than a legal one, it is felt that it would be inappropriate to include this in the independent adjudicators remit. The approach outlined in the consultation document is consistent with that taken for the issue of other types of permit by Roads Service and will remain unchanged.
70	Paragraphs 6.2.1, 6.3.1, 6.4.1, 6.8.1, 6.8.2, 6.10.4, 6.10.5: "The Council notes that the answers to all the frequently asked questions, particularly those noted, are critical and that the Department should be upfront about these issues when undertaking public consultation."	51L	Comments noted. The FAQ section has been provided solely in an attempt to explain the policy rather than as part of it.
71	"The residents of Stranmillis are, for the most part, in favour of the Residents' Parking Scheme".	52V	Noted
72	There needs to be a high level of consistency when enforcing the rules of parking, the rules must be very clear. People must be able to understand and become familiar with the rules which need to be user friendly and as straight forward as possible.	53R	The legislation is quite straight forward. With some limited exceptions, those parking without displaying a valid permit (resident or visitor) or other form of parking ticket will receive a penalty charge notice. As part of the overall approach to consultation Roads Service will be preparing and making available public information leaflets to explain how schemes will work.
73	"Nil Return."	54C	Noted
74	"I favour the introduction of Residents' Parking Schemes.... I welcome the proposal that schemes will be tailored to meet the needs of individual areas...I do not agree with the proposal that schemes will not be introduced where residential parking is primarily off-street..... I would support the introduction of a pilot scheme for Residents' Parking in a non-city centre area such as the lower Malone area in Belfast."	55R	Noted
75	"We welcome the intention to look at the impact of displaced vehicles migrating to surrounding areas.... For example, the Rugby/Holylands area could be included residents' parking provision for daytime only; and then find itself swamped at night from displaced vehicles from the Botanic area if a different scheme was to operate there."	57V	Scheme design will look at this.
76	"We note the reference to the needs of churches and schools. To this we would add crèches/childcare centres of which we have two in our area. We believe that designated parking bays should be set aside for childcare centres so that parents can drop off and pick up their children safely at any time of the day. We believe that this would enhance the Section 75 provisions in parking schemes."	57V	The legislation allows for short term drop offs and pick ups. Designated parking bays are not therefore required.
77	"Residents must be fully involved in the design of schemes. Their views should be taken fully into account in final decisions for a scheme; and they should receive a full explanation of decisions."	57V	Consultation will be undertaken throughout the scheme design. Plans showing the intended scheme layouts will be made available to residents both on demand and at meetings with locals.

78	"While we believe that the Rugby/Holylands area will qualify for a Residents' Parking Scheme the qualifying percentages for a scheme appear to be fairly high. In densely populated areas, such as the Rugby, Holylands and Stranmillis areas, the policy should be to allow only residents' parking in the residential streets."	57V	Policy to respond to need and will prioritise accordingly, it will not base priorities on densities.
79	"We oppose the proposal to allow parking on the footway. This does not meet Section 75 requirements. We specifically identify disability, whether the disability is one of poor vision or mobility linked to use of a wheelchair or other mobility aid. We also identify 'those with dependents', namely parents or childminders pushing prams or walking with children. Quite simply, it is matter of health and safety; people should not be expected to negotiate their way around vehicles parked on pavements, or to move out onto the carriageway. It is wholly unacceptable."	57V	Roads Service recognises that partial footway parking is not ideal. However, there are situations where it will be unavoidable not to allow footway parking without severely restricting the parking provision in the area. It is also felt that marking bays should formalise and better manage an existing situation.
80	"We note the intention to ensure that developers do not evade their responsibilities for providing parking with accommodation. We wish the policy to be more specific in this regard, including enforcement and sanctions. We can identify two problems as a result of intensification of residential development in the Rugby/Holylands area. The first concerns pricing of developer-provided parking; for example, there has been poor take-up by residents' take-up of parking provided in a recent large development in Rugby Avenue leading to pressure on on-street parking and a new headache for long-term residents who now find it difficult to park nearby their houses. The second is where developers continue to build accommodation for from 4 to over 20 occupants (mainly students, many of whom have cars) normally without parking provision in the space where there were just one to two family houses."	57V	Policy can not change planning requirements, it can however restrict the issue of permits for residents of new developments. The stipulation places the onus on the developer to provide the necessary parking for a new development and recognises that street space is limited. Glasgow operates a similar approach, with theirs being quite a bit more stringent in that any residences developed after 2000 not being eligible for inclusion in a Residents' Parking Scheme.
81	"In areas where there is a transient population the department should award residents permits on length of residency. Given the transient nature of some residents (e.g. annual residents such as students) we believe that permanent residents should be given priority consideration in the provision of parking permits. "	57V	Issuing permits on the length of residency would be inequitable and not be fair to newer permanent residents. It is not proposed to introduce such a stipulation.
82	"We are concerned about the restriction in visitors' permits; and are opposed to the specifics of the provision on two accounts: (i) the number of hours per permit; and (ii) the low number of permits. The number or permits suggested, other than for residents over 65 years, amounts to barely one visiting car on one day per week.... Where does the department suggest they park?....In an essentially residential area, residents – especially long-term residents - must have priority for themselves and visitors. At a minimum the number of visitor permits should be doubled for long-term residents."	57V	As a result of the consultation exercise and visits to Croydon and Glasgow it is proposed to extend the operational hours of the visitors permits from 4 hours to all day (or for the scheme operation hours during that day.) The numbers issued are similar if not more generous than elsewhere so it is not proposed to change this. If a valid case can be made it will be possible to obtain more visitors permits on an individual basis.

83	"Where businesses are essentially contained on one or two streets that are mainly commercial their parking should also be contained within those streets and not encroach on the surrounding residential area. This should be aided by short length of waiting time on these streets as suggested in the draft policy. Commuter parking, whether associated with businesses adjacent to/in residential streets or for those working further afield, should not be provided for in residential streets; especially where there is high density residential population."	57V	Agreed and noted
84	"The University supports the introduction of Residents' Parking Schemes in HMO Policy Areas. The impact of this restriction must be assessed and must be supported by improvements in public transport prior to it's introduction."	60B	The provision of improvements to public transport provision is outside of the scope the Residents' Parking Policy. Translink will, however, be informed of potential schemes as part of statutory consultation arrangements.
85	"The Council would argue that consultation with Councils should be detailed and involve Councillors from an early stage.....The Council would urge that residents parking be introduced in areas where the night time economy attracts increased traffic and parking problems for residents in town centres."	61L	Early engagement essential for the success of any scheme. The policy recognises that individual schemes may differ and that differing designs may be required in different areas.

Proposed Charges

No.	Comment/Question	Raised By	Response
86	"The Council, however, is very concerned that a proposed annual charge of £80 per resident will be levied. the Council is apprehensive about the adverse impact this charge could have on residents, particularly those on low incomes or pensioners"	6L	The level of charge for permits detailed in the consultation document was calculated on a full cost recovery basis. This is in line with Government direction that requires that Departments operate within set financial limits. Any new initiative has therefore to be financed at the expense of other projects or be self financing. Taking cognisance of the level of concern about the charge, it has been decided that a reduced charge should be set for those on low or fixed incomes. This charge is to be £40 (half the standard charge) and the cost of providing the concession will be partially offset by revenue raised from mixed schemes. To assist with scheme administration, the reduction will only be applied to schemes within Neighbourhood Renewal Areas as defined by the Department for Social Development
87	"Residents may also feel rightly aggrieved at having to pay for parking near their homes which had otherwise previously been free."	6L	
88	"Whilst we are in favour of the introduction....., we feel that the proposed charges of £80 per household and £25 for visitors' permits will be a severe burden on people. We have many in our area who are pensioners, or other people living on fixed incomes.....We feel this is unfair , especially in light of other Government charges to be introduced at around the same time - e.g. water rates. We would urge DRD and Roads Service to rethink the issue of charges and to consider ways to reduce the financial burden they will impose on those less well off.... We feel that anyone in receipt of the old age pension, income support or low wages should not be asked to pay the proposed charges."	7V	
89	"I am disgusted that the residences of the area are being made liable for payment of this zone, when they should have the right for their families and friends and/or carers to park for free.....I to have paid my road tax, vehicle and petrol tax like everyone else, but it is us the visitors to family and especially the Family member in these new purposed zones in being penalised for parking at there residence.....Yet again it is the innocent people that are being punished or pay for other in considerate people/drivers behaviour."	8R	
90	"there was a consensus among members supporting the principles of parking schemes par se, although many considered that the details in respect of proposed charges (eg at £80 per parking scheme permit) needed to be reviewed...Council endorsed the different parking categories as comprehensive and considered that cost implications could be reviewed to ensure that local residents (elderly, disabled, low income) were not duly disadvantaged."	16L	
91	"there is a feeling that the charge may need to be reviewed for those in low income households especially as an £80 fee could present difficulties in some families."	18C	
92	"The imposition of a £80 recovery charge may have a considerable impact on many tenants. We would request that serious consideration be given to waiving this charge for households in receipt of housing benefit/rates relief."	19C	
93	"... would it be possible to have a more concise breakdown as to why this fee is necessary and how the sum of £80 was reached by your department?..... Given that we are merely asking for the right to park our vehicles outside our own home I am at a loss to understand why this fee should be imposed upon us."	20R	

94	Whilst it is recognised that charging for permits is necessary, the Council considers that free permits should be extended to low income families, those on all benefits and also senior citizens."	24L
95	A lower or no charge should be considered where, as in many of the proposed Belfast areas, the proposed areas for residents car parking coincide with Neighbourhood Renewal Areas. I should say (see below) that I have received strong representation from constituents on this point.	26R
96	"...The Government has argued that a cost of £80 per household would reflect the overall costs of administering the scheme. However, through past planning decisions, the Government has contributed to a situation where non-household parking spills over into residential streets. Account also needs to be taken of those on benefits. Therefore, it is unreasonable that residents are asked to bear the full cost."	28L
97	"A charge of £80 per permit seems reasonable and the Association would anticipate a high take-up in our area."	30V
98	"...it is the position of the Partnership Board that, in addition to the parking scheme being free, a percentage of revenue generated through enforcement should be allotted to local community organisations to undertake activities within the community."	32V
99	"Some members are concerned that the charges amount to an additional tax on residents."	35L
100	"It is noted that it is the intention to have full cost recovery. Would it not be preferable to have a surplus which could be used to provide more park and ride capacity, thereby securing the continued viability of our town and city centres	36C
101	"The requirement to base permit price on cost recovery should be removed with additional funding provided from DRD Roads Service to supplement the scheme"	37L
102	"The pricing structure should be realigned to take account of the number of permits issued so that the charge is in proportion to the availability of parking spaces. This formula should also take account of the number of visitors permits issued."	37L
103	"...The suggestion that those who live in such communities should pay for the benefits deriving from the introduction of a residential parking scheme are ludicrous in the extreme. The increase in commuter parking was a direct result of the urban regeneration of Belfast City Centre..... It is also nonsensical to suggest that residents should pay for such a scheme with no guarantee of somewhere to park....not only will we as a community organisation not support schemes that are financed by our residents, we will effectively lobby against such proposals and advise residents not to comply with such schemes."	40V
104	"While being in favour of residents parking, we do feel that £80 per household is somewhat excessive and this should be reduced."	41R

105	"There would appear to be concern for charging for residential parking schemes and the amount required to be paid especially for areas in the inner city which suffer already from deprivation and problems associated with congestion and parking problems. Any proposed cost should be comparable and the amount proposed was felt to be considerably more than was charged in other cities in the United Kingdom.	44V
106	"The committee has concerns however, about the financial impact of the proposal on older people..... we believe there should at least be a reduced rate for people on low incomes such as older people."	45V
107	"...the Council does not support the proposals currently outlined and in particular objects to charges being levied against residents and visitors for the acquisition of parking permits.....The Council understands that measures are needed..... The Council, however, believes that this could be achieved through the introduction of a disc system, as currently operated in many cities in England, for which no charge is made for residents."	46L
108	"The council would request clear justification of the proposed costs of £80 per resident per year to be outlined and an indication of any benchmarking with comparable examples of costs of schemes implemented in other UK cities.... Council has strong concerns over the charging for residential parking schemes in Northern Ireland. Inner city communities in Belfast have suffered from the negative effects of commuter parking for a number of years and a majority of these areas also suffer from high levels of deprivation. An extra charge for residents in inner city areas due to external factors beyond their control appears unfair. It is the council's position that this scheme should not increase the levels of financial hardship in already deprived communities in inner city areas. "	47L
109	"...given the assertion in paragraph 1.2.4 that residents will not be guaranteed parking on their street then the charge for then scheme described in paragraph 1.5.1 reduced to zero...in addition to the parking scheme being free, a percentage of the revenue gained through enforcement should be allotted to local community organisations to undertake activities within the community."	49V
110	Para 1.51 "We are concerned that the scheme proposed would not penalize people from outside the area parking; instead residents would be expected to pay in order to solve the problem."	50V
111	"We would object to these schemes being at a cost to residents."	50V
112	"Para 1.2.4: The Council would highlight the need for resident's parking schemes not to put too onerous a financial burden upon residents effected, whilst achieving full cost recovery to ensure no additional burden is carried by the public"	51L
113	".... a survey which was carried out in February 07, indicated that the majority of residents did not agree with the concept of paying for a parking space in their own area of residence."	52V

114	"I am of the opinion that the cost of the residents' permits is totally unacceptable, at a flat rate of £80 per annum; it is completely overpriced and lacks any consideration for those on low incomes, people on benefits, and older retired people on a small pension. It is unfair to make residents pay when the extra traffic is not of their making. This residents parking charge is nothing more than a poll tax on local car owners.....Enforcement brings fines which might be enough to meet the costs that Roads speak of in the consultation....The level of charge is much higher when compared to other residents parking schemes in other towns and cities in Britain. The consultation states that the charge will be subject to a biennial review. It is unclear whether such a review is likely to increase the charges. My bottom line on this is residents parking permits should be free of charge."	53R
115	"In my view the totality of schemes in a geographical area should achieve full cost recovery, not an individual scheme."	55R
116	"I would support a reduction of the cost of a resident's permit for senior citizens."	55R
117	"We are already been asked to pay a lot more for rates and water charges. Another charge to park our cars is just too much. . . . Just because there is residents parking does not guarantee there will be a space to park therefore what's needed is proper car parks for those working in the area."	56R
118	What do the residents get for their £80 a year?	56R
119	"We understand the need for the department to operate Residents' Parking Schemes that are cost effective. However, it is a fact that because of where they live, certain residents are being asked to restrict their lifestyle (as regards visitors) and pay for something (parking) that residents in other areas have for free. RRA residents are willing to pay towards parking, but feel that £130 a year is excessive i.e. £80 for a Resident's Permit and £50 for Visitors' Permits over the year. Indeed, if there is a second car this would amount to £210. RRA residents believe that the cost of a Resident's Permit should be £30-£50. The cost of Visitors Permits should be halved; or permits doubled for the same cost."	57R
120	We are disturbed that the consultation paper proposes introducing a charge of £80 per household for the provision of a residents parking permit. We are opposed to this suggestion in the strongest possible terms. Shaftesbury Ward, which contains the areas of South Belfast most adversely affected by this problem is recognised by the Noble Indices being inside the top 10% in its multiple deprivation index. This being the case we are at a loss to understand how the Department can propose levying people living in areas such as this for the right to park their cars outside their homes....Resident rights should be the over-riding concern. Therefore for financing the scheme we would propose that in order to recoup the costs of the schemes the department should utilise a proportion of the funds raised in fines for parking violations to cover the administration costs and day-to-day operational expense of the scheme. It is only fair that the perpetrators of this problem should be expected to foot the expense of it. 5. In recognising that disabled people (Blue Badge Holders) would be eligible for a free residents permit, we believe that the department has conc	58R

121	"I wish to object at the departments proposal 1.51 that full cost recovery should be directed at residents living in those areas where it is likely residents parking schemes will be introduced. I believe a scheme should be introduced where residents should not be penalised for living in a particular area and that non residents should be responsible for the full cost recovery of this scheme."	59R
122	"The charge of £80 to all residents does not seem to be subsidised for those on benefits or low income."	61L
123	"Mencap does not accept that the proposed charge for a resident's permit is low. Most people with a learning disability rely on benefits. Research studies have shown that the additional costs incurred by people with a learning disability and their families is not covered by the benefits they receive. We believe that the Department should introduce concessions which recognise the extra costs incurred by disabled people."	62V
124	"We already pay rates and a substantial excise duty and feel aggrieved that we should be asked to stump up another fee to allow us to park at our property."	63R

Residents Permits

No.	Comment/Question	Raised By	Response
125	The Council notes that initially only one resident's permit will be issued to an individual residence or business and that further permits will only be issued where they can be made available to all eligible applicants, up to a maximum of 2 permits per residence. This could pose problems for residents, particularly as many families now have at least 2, or perhaps even 3 cars being driven by family members."	6L	Kerb space is limited and providing for unlimited demand would ultimately negate any positive impact a scheme may have. The initial restriction as detailed in the policy will still apply.
126	"I don't believe that permits should be denied to residences having off street parking because in many cases the off street parking is unsuitable and certainly no solution for a two car home. Residences with off street parking should be allowed to have at least one permit and in this case the permit should be interchangeable between the two vehicles, not vehicle specific."	9R	The policy has been developed to help those who are finding it difficult to park in close proximity to their home and it is considered that where suitable off-street parking is available then this should be used to accommodate the first car, accordingly the policy will remain unchanged. There will be the opportunity to obtain a permit during the second round of permit issue. It is not possible to issue open permits. The permit needs to carry the registration of the vehicle on it for enforcement purposes.
127	Any "proof of residency" should ensure that it doesn't discriminate or alienate those valuable members of our society. The consultation document refers to "passport" - can this be any nation's passport - eg, an Indian one?	13R	No-one will be discriminated against. Any valid national passport is acceptable as proof of identity.
128	"Discounts should also be offered to pensioners and those on low incomes and possibly if a household is applying for 2 permits for 2 cars."	15R	See costs - No 86 onwards.
129	"...our business owns its premises in University Street in Belfast.... The majority of houses in and around University Street are rented out to students and many of them are classed as HMOs"..... Many students drive and have cars, and it is this which causes parking problems for businesses such as ourselves. These students drive up to Belfast on a Sunday night and leave their cars, often unmoved, all week, before going home for the weekend. Are all the students in one house to be able to apply for a permit?. I agree entirely with the sentiments of the consultation, but just feel that it needs to be flexible enough to cover different problems, situations and circumstances."	17B	Houses of multiple occupancy will be treated as one residence so will only be entitled to one permit.
130	"We welcome the intention not to introduce a residents parking scheme where existing provision is primarily off-street"	19C	Noted.
131	"What provision is being made in relation to residents permits for houses in multiple occupation?"	19C	Houses of multiple occupancy will be treated as one residence so will only be entitled to one permit.
132	"Within our household we have 2 vehicles, my mothers and my own. My mother is a blue badge holder whereas I am not. It is important for us to have separate vehicles as I am required to use mine, on occasions, for work purposes. I would like to ask whether, given our circumstances, that this document can guarantee us the 2 necessary permits for the one address?"	20R	In this case the policy allows for the 2 permits to be issued.
133	"The Council seeks assurances that the policy will exercise much needed flexibility in ensuring that residents parking is provided as closely to the door of the residents concerned."	24L	The scheme cannot guarantee spaces. It should however free up space and make available parking more readily available. The initial restriction of one permit per residence should improve the opportunity to park closer to the home.

134	"I would be keen to have a parking space allocated to me in Parkmount and would even pay towards that goal provided it wasn't too expensive."	27R	The scheme cannot guarantee spaces. It should however free up space and make available parking more readily available. The initial restriction of one permit per residence should improve the opportunity to park closer to the home.
135	".... a property consisting of 3 rented apartments should qualify for a minimum of 3 parking permits."	30V	This is how the policy is intended to operate.
136	"What is the justification for the use of 1.2 permits per available space."	30V	The limit of 1.2 permits for kerb space comes from experience elsewhere in G.B, oversubscription will defeat the purpose of the scheme and ultimately negate any positive impact a scheme may have.
137	".....it is proposed that schemes will not be introduced where residential parking is primarily off-street. Most houses in this area have their own garages and driveways, but no more than will cope with the residents own needs - visitors usually have to park outside on the street."	39R	Noted. The policy allows for schemes where there is limited amount of private off street parking available. It will not, however, cover situations where the majority have ample private off-street parking provision.
138	"Need to consider the needs of the residents and ensure that there is some flexibility built into the system and review of the needs of the street as required with demographic changes."	44V	Policy is designed to evolve with experience.
139	"The Council would request measures in the draft policy to ensure over subscription will be avoided."	47L	The 1.2 limit on the number of permits per space is designed to ensure this is.
140	"The Council considers the policy of one permit per residence may be inflexible..... Judgement should take place on a dwelling by dwelling basis subject to documentation and regulation."	47L	Operationally the numbers must be limited to avoid oversubscription. There is however a certain amount of flexibility. An increase in numbers of permit per residence may be available after the initial scheme roll out depending on demand.
141	"The 'proof of residency' and 'vehicle ownership' forms for parking permits are considered to be much too detailed and complex."	50V	Roads Service considers that this level of detail is required to control the scheme application and to reduce the likelihood of any possible abuse.
142	Para 6.10.5 "This states that there is no guarantee of getting to park outside our own houses, therefore we would consider this another valid reason for there being no cost levied to residents."	50V	See costs - No 86 onwards.
143	"The Council notes that possession of a valid permit does not ensure entitlement to park however, Council requests that scheme proposals are considered very carefully to ensure that residents are able to park within their neighbourhood."	51L	The scheme cannot guarantee spaces. It should however free up space and make available parking more readily available. The initial restriction of one permit per residence should improve the opportunity to park closer to the home.
144	Paragraph 1.12.1: "The Council would question the initial allocation of only one permit per residence or business. The council would highlight the increasing number of households owning more than one car, the increasing number of houses in multiple occupation and the need to encourage economic/ business development and not stifle it. The provision of a maximum of two business permits irrespective upon the size of the business may be completely unsatisfactory depending upon the specific situation."	51L	Kerb space is limited and providing for unlimited demand would ultimately negate any positive impact a scheme may have. The initial restriction as detailed in the policy will still apply.
145	".... All residents should have the same right to park their vehicle, regardless of whether they own their property or not and the amount of time they stay there should not be relevant..... While we agree that the 'floating residents' have the same right of parking as the permanent residents, we are concerned that the weight of numbers will cause a shift of balance away from the wished of the permanent residents."	52V	HMOs are to be treated as one residence therefore will only have one vote when voting for a scheme.

146	"What guarantees do we have that permits will not be given to any Tom, Dick or Harry that are non residents."	63R	Applicants must be able to prove identity, residency and use of a specified vehicle. Only original documentation will be accepted as evidence.
-----	---	-----	--

Visitors Permits

No.	Comment/Question	Raised By	Response
146	"if I was living in one of these areas but I didn't have a vehicle therefore not needing a permit, what would happen if someone with a vehicle was staying with me for more than a day, ie staying with me for the weekend, a few days, etc or longer?"	1R	Residents will need to provide visitors permits. It is proposed to extend the length of these from 4 hours duration to the whole day or the daily hours of operation of the scheme.
147	"The Council is concerned that, although Visitor's Permits will be available, they will only be for a four hour maximum period....."	6L	A visitor's permit will now be valid for a full day of scheme operation.
148	the restriction on the number of Visitor's Permits could have an adverse impact on social interaction, particularly for older people living alone.	6L	A visitor's permit will now be valid for a full day of scheme operation. It should be remembered that the opportunity for parking will be greatly increased and that will provide a positive impact on social interaction.
149	The introduction of such schemes will have an adverse effect on both visitors and those residents who require more frequent visits for a variety of reasons including at risk family members, elderly, sick, single parents, bereaved etc.	13R	A visitor's permit will now be valid for a full day of scheme operation. It should be remembered that the opportunity for parking will be greatly increased and that will provide a positive impact on social interaction. Other special permits can be obtained to cover the situations mentioned and in mixed use schemes, the option to pay-and-display will be available.
150	"Whilst NITB recognises the need for parking restrictions in terms of local residents it is important that tourists, who contribute much to our economic growth, should be afforded every opportunity to enjoy a seamless and positive experience while in NI. NITB therefore wishes tourist parking and luggage drop-off is to be considered as part of this consultation.....It is therefore important that provision of permits in relation to tourist accommodation should be proportional to the number of visitors who use that accommodation."	25C	While recognising the needs of hotels and B&B it must be remembered that schemes are primarily intended for the benefit of residents. Experience from elsewhere indicates that accommodation businesses operate within Residents' Parking Schemes without the need for special consideration. Drop offs and pick ups will be accommodated but these must be of very short duration.
151	"The proposal for a four-hour visitors permit is extremely restrictive As visitors sometimes stay overnight or longer, a limited number of visitors permits per household should be allocated for evenings and weekends"	30V	A visitor's permit will now be valid for a full day of scheme operation.
152	The questionnaire on residents parking should contain a question on visitors parking."	30V	Question 24 of the questionnaire relates to visitors permits.
153	"I don't see why I would have to pay for a car I don't have. Also my nurses can't get parked or ambulances or taxis as I can't walk far there is always strange cars at my door so why can't they pay."	38R	The policy has been designed to ensure that a resident does not have to pay for health carers etc that have to visit them. Taxis will be allowed entry for pick up/drop off purposes without charge.
154	This policy seems to be restrictive and the associated extra costs of £12.50 and £50 may be very prohibitive and questions are asked over enforcement and management of such a process."	44V	A visitor's permit will now be valid for a full day of scheme operation but, in order to ensure that residents needs can be accommodated, the number of visitors permits issued will remain as specified in the consultation document.

155	"The Council is concerned about the potential impact that the proposed costs may place on low income homes, in particular older people..... Is crucial that any system should be carefully considered to ensure that these homes are not adversely affected as a result of access issues for friends and family. The associated costs and paperwork required to obtain visitors permits could result in increased marginalisation and isolation for these homes. Further consideration should be given to the number of visitors permits that are afforded to residential businesses..... to prevent a reduction in client interest. The current proposal of 25 permits per quarter would appear to be insufficient to allow for regular business demand in this sector."	46L	The impact on costs is covered in the 'Proposed Charges' section. The numbers of visitors permits is based on average from G.B which are generally seen as sufficient.
156	"This policy may unnecessarily restrict the social activities of those people within an area covered by a scheme....These extra costs should be removed and the amount for visitors permits per household reconsidered in order to give family and friends a degree of free movement in the areas."	47L	The charge is required for two reasons, to cover costs and prevent abuse.
157	"The residents feel strongly that they should not be expected to pay for visitors to their homes	50V	See 'Proposed charges'.
158	"...the residents feel very strongly that it is a complete nonsense to put a time limit on visitors."	50V	A visitor's permit will now be valid for a full day of scheme operation.
159	"The Council notes that businesses will be able to purchase 100 permits a year for visitors. The Council considers that detailed consultation with businesses that are to be affected by residents' parking schemes should be undertaken to ensure no unacceptable adverse impacts result – in addition assistance should be given in relation to the preparation of Green Travel Plans for employees. The Council suggests that the provision of dedicated visitors' parking areas outside businesses may be necessary to prevent scenarios arising whereby visitors have to park (not necessarily outside the premise), obtain a visitors permit and return to the car to display it."	51L	Dedicated parking places outside businesses will not be provided, however it is considered that space will be freed up during the hours of operation of any scheme. In addition, where mixed schemes are implemented, an option to pay and display will be available for short term visitors.
160	"The Council questions what use the provision of 4 hour visitors permits are to hotels, guesthouses and B&Bs? The Council highlights the importance of such business to the local economy and would request that special permits be allowed for people staying at such facilities. For a driver straying at such a location a 4 hour pass is unlikely to be satisfactory."	51L	A visitor's permit will now be valid for a full day of scheme operation.
161	"It is unclear how visitors' permits will operate; the dispensing of such permits seems very complicated and administratively heavy. There is also no detail given on how such permits are to be paid for. I also believe the fee for visitors' permits is too high."	53R	It is envisaged that Visitors' Permits will be in the form of scratch cards which will be available from Roads Service. The visitor will scratch of the day and date and leave card on dashboard.
162	"I welcome the reduction in the cost of visitors' permits for those over 65 years."	55R	Noted
163	"The idea of having to pay for visitors permits and then only allowed 25 half day permits is a bit daft. Normally if I have friends for a weekend there may well be 2 or 3 cars which need to park from Fri pm to Sun evening. 25 permits is hardly enough. What happens if unexpected visitors call?"	56R	The half day stipulation has now changed to a days operation. Schemes will normally operate 8-6 Mon - Fri so may resolve this local issue, otherwise a visitor's permit will be required or the visitor may be able to pay and display if it is a mixed scheme.

164	<p>"We are concerned about the restriction in visitors' permits; and are opposed to the specifics of the provision on two accounts: (i) the number of hours per permit; and (ii) the low number of permits. The number of permits suggested, other than for residents over 65 years, amounts to barely one visiting car on one day per week.... Where does the department suggest they park?....In an essentially residential area, residents – especially long-term residents - must have priority for themselves and visitors. At a minimum the number of visitor permits should be doubled for long-term residents."</p>	57V	<p>A visitor's permit will now be valid for a full day of scheme operation. The number of visitors permits to be issued each quarter is based on findings from visits to similar schemes in Great Britain and is seen as sufficient. The ability to incorporate other forms of limited waiting including pay and display will also provide a certain amount of flexibility for scheme designers in this respect.</p>
165	<p>"We welcome the additional permits provided to residents who are older than 65 years of age. We believe that this facility should also be available to other vulnerable groups, such as people with a learning disability, who may be dependant on others."</p>	62V	<p>The reason for the age limit is to reflect the generally reduced level of mobility of people this age and the consequential increased need for more home visits. There are no plans to open this up to other groups.</p>

Business Permits

No.	Comment/Question	Raised By	Response
166	The allocation of 1 permit per business, or possibly 2 is too restrictive, especially as it appears to take no account of business size, number of employees, nature of business etc. This should be amended to allow additional permits for business users with greater needs."	10B	Kerb space is limited and providing for unlimited demand would ultimately negate any positive impact a scheme may have. The initial restriction as detailed in the policy will still apply.
167	"The proposal to preclude a business which has access to off street parking from applying for on street permits would appear to unfavourably prejudice those businesses which have made their own arrangements and may therefore be considered unfair."	10B	In this respect businesses are being treated no differently to residents. The intention behind the policy is to improve parking opportunities for residents and it is considered only fair that those with no alternative get priority in the distribution of permits.
168	Para 6.4.1 "Businesses getting parking permits will still not help solve the parking problems the residents experience."	50V	The main problem in most areas is the influence of all day commuter parking, a degree of which is caused by business workers. A business is being treated on the same basis as if it were an individual residence and should have no overall impact.
169	"Businesses can also receive parking permits while consideration will be given to alternative forms of parking control depending on the business type. However, hotels, B&B's etc. will be treated the same as other businesses in relation to permits. This is disadvantageous to the town's businesses who have a range of visitors staying for some time. "	61L	Within towns there may be opportunity for implementation of mixed use schemes and visitors will be able to pay and display. This opportunity, together with the use of visitor's permits should provide ample flexibility for businesses.

Health Carers Permit

No.	Comment/Question	Raised By	Response
170	"pleased to note the provisions in the draft policy for health carers , the Northern Ireland Fire & Rescue Service and the Northern Ireland Ambulance Service."	4C	Noted
171	"As with Health Carers permits, can provision be made for Housing Officers who are frequently required to make home visits?"	19C	Housing officers should be able to pay and display.
172	"The policy of providing free permits should be extended to include residents over the age of 65 regardless of blue badge status and provide both these groups with free visitor parking permits."	37L	The concerns about expanding the amount of parking has been noted and answered elsewhere. There are no plans to alter the coverage.
173	"Health and associated carers should be issued with general carers permits from their associated Health Trust and this extra burden should not be placed on the residents."	44V	Health care permits can to be issued to Local Health Trusts with no cost to residents.
174	"The option for people to use visitors permits for health visits should be removed... It would be more appropriate for the priority to be on local HPSS Trusts to provide Health Carer's working in a scheme with the required permit."	47L	The option for residents to use visitor's permits to provide flexibility within the policy to accommodate infrequent and sporadic house calls without recourse to the carer having to source a valid permit, and will remain in the policy. In general regular house visits will be accommodated by either Health Carer Permits or through short term limited waiting arrangements such as pay and display.
175	"Paragraph 1.15.1: The Council notes the suggestion that residents could provide visitor permits to health carers. The availability of health carers' permits should be highlighted clearly to the relevant Trusts to ensure this does not happen."	51L	The option for residents to use visitor's permits to provide flexibility within the policy to accommodate infrequent and sporadic house calls without recourse to the carer having to source a valid permit, and will remain in the policy. In general regular house visits will be accommodated by either health carer permits or through short term limited waiting arrangements such as pay and display. Health Trusts will be fully informed of the options available for access at the scheme implementation stage.
176	"Paragraph 1.15.5: The Council would note that consistency must be demonstrated in providing free permits to health care workers of all health related charities."	51L	The policy has been clarified to state that Health Carers' Permits will be available to allorgainsations providing health and social care services.

Special Permits and Exemptions

No.	Comment/Question	Raised By	Response
177	Vehicles engaged in discharging statutory functions would include the vehicles of inspectors who are required on occasion to visit employees or business premises in discharge of duties imposed under the Health and Safety at Work (NI) Order 1978. These vehicles are privately owned and do not bear the logo of HSENI. It is not clear from the draft policy how such vehicles would be identified and exempted from any penalty.	12C	It is recognised that there are difficulties identifying exempted vehicles that are not easily recognisable. It would also be impractical to issue permits to these vehicles. The extended use of mixed scheme where the vehicle pay and displays could get round this.
178	What about utility vehicles? There's no mention of how NIE, BT, NTL, Water Service vehicles would get permission to park in an area. Often faults are not specific to a single residence, so these couldn't be covered by a resident's visitor's permit.	13R	In general liveried vehicles will be exempt. Traffic attendants will be able to challenge unmarked vans or lorries to ascertain whether they work for a statutory undertaken or not. If a PCN is issued the contractor can apply to have the fine exempted.
179	"Access for NIHE maintenance and contractors vehicles is essential and we seek confirmation that these are covered as statutory undertakers.."	19C	In general liveried vehicles will be exempt. Traffic attendants will be able to challenge unmarked vans or lorries to ascertain whether they work for a statutory undertaken or not. If a PCN is issued the contractor can apply to have the fine exempted.
180	The consultation document details how special permits may be issued to builders, but does not appear to explain the procedures for short term parking of essential service agents to effect repairs to householders within the residents parking areas.	23B	If the agents are and can prove they are working for a statutory undertaken then they do not need a permit. If they are a private concern they will either need a special permit or a visitors permit. Alternatively if the scheme is mixed they can pay and display.
181	"The cost of a special builders permit is excessive. Such costs are not only likely to be passed on to residents but there is also the risk that it will act as a disincentive to builders to undertake maintenance work in the area."	30V	The costs are intended to make builders approach their work in a different way. For example builders skips can sit for weeks occupying road space making it unavailable to other residents. An alternative is for the builder to use a trailer.
182	"It is noted that in Section 1.8 permits can be issued in relation to formal wedding cars. As wedding ceremonies are a statutory function of the Council's Registry Office we would ask that this matter be considered."	43L	The limousine company needs to apply for a special permit.
183	"The Council welcomes the recognition that vehicles will not require permits as they deliver their statutory duties, however requests clarification on other services residents may require such as delivery of heating oil or house repairs."	47L	Heating oil delivery vehicles will not be ticketed. Someone doing house repairs can either use a visitors permit or organise a special permit.
184	"Paragraph 1.16.1: The Council questions the efficiency of applying for and the issuing of one off permits."	51L	The policy is to improve the parking conditions for residents of an area. Control over the issue of permits and access to the zones is essential otherwise the scheme will not work. While not entirely efficient the control of short term permits is deemed vital to the success of schemes.
185	"Paragraph 1.16.3: The Council requests further guidance / clarification as to what situations may be acceptable in relation to the issuing of special permits. The Council again highlights the importance of communication in relation to its decision making processes."	51L	The listing in 1.16 Special Permits includes weddings, funerals, building work, church access, on going family cars and attendance by a Minister. The list is not intended to be exhausted and Roads Service will be prepared to look at all special circumstances on a individual basis.

Scheme Implementation Issues

No.	Comment/Question	Raised By	Response
186	"welcomes the provision for Health & Social Services Trusts to be consulted prior to the implementation of Residents' Parking Schemes"	4C	Noted.
187	"The draft policy gives no indication as to the areas that will be covered by the schemes....it would be useful for areas at risk to be identified in the policy."	47L	The policy is an operational tool to help implement schemes. It is not identifying schemes.
188	Para 1.4.1 "We would request clarification of what constitutes a public inquiry in these matters. Will residents parking schemes be implemented regardless of residents views?"	50V	RP schemes are to allow residents to be able to park close to their homes. Schemes in general will be locally led, and schemes will only be introduced with local support.

Public Consultation - Residents Parking Schemes

Details of Respondents

No.	Individual/Company Details	Category
1	Paula O'Sullivan	R
2	Northern Ireland Judicial Appointments Commission	C
3	Keith Jeffery	R
4	DHSSPS	C
5	Northern Ireland Ambulance Service	C
6	Limavady Borough Council	L
7	Morton Community Centre	V
8	John Crooks	R
9	David Gibson	R
10	Andrew Nesbitt Architects	B
11	North Down District Policing Partnership	C
12	HSENI - Jim King	C
13	Alan Meban	R
14	Gail Crawley	R
15	David Thompson	R
16	Antrim Borough Council	L
17	Federation Of The Licensed Retail Trade NI	B
18	Eastern Health and Social Services Board	C
19	Northern Ireland Housing Executive - S Cuddy	C
20	Mr D, Mrs G and Mr B Morgan	R
21	Mrs S I Brann	R
22	Down District Council, Norman Stewart	L
23	Freight Transport Association, Tom Wright	B
24	Armagh City and District Council	L
25	Northern Ireland Tourist Board	A
26	Dr Esmond McBirnie MLA	R
27	Mrs Anne McClenahan	R
28	Cllr Stephen Farry (Alliance Party)	R
29	Daniel Cezar	R
30	Lower Malone Residents' Association	V
31	Mr Evan Connolly	R
32	South Belfast Partnership Board	V
33	DFP Valuation and Lands Agency	C
34	Padraig Walsh	R
35	Ards Council	L

36	Translink	C
37	Ballymena Borough Council	L
38	Iris Ewing	R
39	Mr V Alan Hewitt	R
40	Market's Development Association	V
41	Park Avenue Bangor Residents	V
42	Mr G Sherwood Hobson	R
43	Fermanagh District Council	L
44	West Belfast Partnership	V
45	IMTAC	C
46	Craigavon Borough Council	L
47	Belfast City Council	L
48	Institution of Highways and Transportation - Northern Ireland Branch	V
49	Lower Ormeau Residents Action Group	V
50	Donegall Pass Community Forum	V
51	Lisburn City Council	L
52	Stranmillis Residents' Association	V
53	Carmel Hanna (SDLP)	R
54	DCAL	A
55	Brendan McMorrow	R
56	Helen McPhillips	R
57	Rugby Residents' Association	V
58	South Belfast DUP	R
59	Councillor Bob Stoker	R
60	Queen's University Belfast	B
61	Banbridge District Council	L
62	Mencap	V
63	Ms Fiona Walls	R

Key to Categories

C	Central Government Bodies
L	Local Government
V	Voluntary/Community Sector
B	Business Sector
R	Residents / Individuals / Elected Representatives