Covering letter to Portfolio Holder.

PROPOSED ORDER

APPENDIX C

NOTTINGHAM CITY COUNCIL (THE VICTORIA EMBANKMENT, NOTTINGHAM) (OFF-STREET PARKING PLACES AND RESTRICTED PARKING AREA) ORDER 20015 OSP 8017

SUMMARY OF UNRESOLVED OBJECTIONS FOLLOWING PUBLIC ADVERTISEMENT

OBJECTORS	REASON FOR OBJECTIONS	DPT RESPONSE
(No.1)	Concerned that the Order does not take into account the impact on the Meadows area. Council is being quite wilfully naïve, why a driver would pay to park along embankment when they can park for free on residential streets. Those drivers currently using the Embankment will start parking in the Meadows as well. The Meadows area already suffers from match day parking; the proposed changes will makes this a constant problem. Understands that the Council needs to find additional revenue, charging for parking will generate this, so would rather Council be upfront with their motives. If no measures are taken in the Meadows, there will be no revenue from parking, you will only cause a great deal of annoyance and inconvenience to local residents. Need to look at preventing the impact of the scheme on the Meadows before you progress any further.	the local Councillors regarding parking in the

(No.2)	I welcome your determination to address the parking problem on the Victoria Embankment. But I have two objections to the payment system. 1; It is discriminatory as many of my friends over 65 do not have a mobile phone and so would be unable to use the system and therefore prevented from parking.	population have a mobile device and this is increasing yearly. The use of a mobile phone is not simply limited to the younger generation and other schemes in the City have proven successful in managing the demand
	2; A fee of £2 would not deter motorist from parking for work purposes it needs to be in line with other whole day parking charges e.g. £5-10.	The £2 charge was discussed and is in line with similar schemes the southern side of the City Centre (Crocus Street area). The focus has not been one of income generation, though any income would go into maintaining the Park, but to have a charge that is sufficient to deter all day parking on the Embankment. There is the option to amend this if the level of charge is not sufficiently high enough to deter all day commuters.
(No.3)	After reading proposals, can honestly say that as a resident the only time parking has been a problem is during sport events. My biggest concern is people will be driven into the highlighted pink area (plan showing residential area) further congesting residential area.	the local Councillors regarding parking in the Meadows. This has come about because of existing parking issues and the potential impact by the tram on
	In summary, feels this plan is unnecessary in cost and concept. Furthermore it has the real potential to make residents lives worse and reduce the usage of the Embankment.	This exercise in conjunction with the local Councillors, highlighted areas where potential TRO's could be required. Though the local Councillors have not prioritised at the moment.

		There are a number of existing Orders already within the vicinity of the Embankment – Hunter Street/Green Street and Bunbury Street areas. However, there could be a need to give priority to residents in places where there are currently no orders and the Authority can do this through the introduction of on-street traffic orders.
(No.4)	Fantastic amenity used throughout the year. Very well used for all sport and activities. Huge amount of families using it all the time, but when sun comes out it is heaving with young families. Why in the name of all that is joyous would you want to discourage that, with horrid parking restrictions? The proposals as it stands are unfair to ratepayers and draconian. Also payment - accepts payments, but only by way of a phone in my opinion should be illegal it is totally undemocratic. Better mechanism would be ANPR and pre/post payment either at the ice cream van, pub or internet. Second letter sent reiterating objection: - Not happy with the fact that a person parking would have to resister with the Councils agent to claim the free parking period (now 2 hours) with concerns of handing over account and personal information with the resulting cyber security issues.	With regards to ANPR camera, the Government has not allowed the using of this type of equipment to local Authorities, when it comes to an Off-Street parking Order. In fact, under, as the Communities Minister, he introduced the Deregulation Act, which stopped the use of CCTV in a lot of cases, when it came to parking. This therefore, is not an option for the Embankment. With regards to the payment - internet payments area available and a person can go online to RingGo and preregister their parking for that day, before they even get there. RingGo is the successful tendered provider of this service to the Council and ensures that information on an individual is kept secure in line with industry standards.
(No.5)	As a resident of the area and a teacher, my view is that introducing parking charges is unfair both to residents and visitors. In particular it discriminates against people on lower incomes. Furthermore,	National statistics are showing that, over 81% of the population have a mobile device and this is increasing yearly. The use of a mobile phone is not simply limited to the younger generation and other schemes in the

introducing pay-by-phone discriminates against people who do not have mobile phones, or who are unfamiliar with the technology. This includes older people, speaker of other languages, and people like myself who do not wish to take a phone when going out for a breath of fresh air and exercise.

Suggestions: - prohibit parking for a period in the middle of the day. Put sign up saying no parking on the grass. One hour is not enough for visitors consider more.

City have proven successful in managing the demand for parking.

It was identified as part of the consultation that a free parking area where visitors do not have to register their vehicle could be available and this option remains for the client – Parks & Open Spaces.

The £2 charge was discussed and is in line with similar schemes the southern side of the City Centre (Crocus Street area). The focus has not been one of income generation, though any income would go into maintaining the Park, but to have a charge that is sufficient to deter all day parking on the Embankment. There is the option to amend this if the level of charge is not sufficiently high enough to deter all day commuters. However, from experience the Crocus Street area has shown that the charge does manage demand and create available space to park.

With regards to prohibiting parking for a period of the day, unfortunately, this would apply to everyone, for that time, severely limiting recreational visits to the Embankment.



Similar comments to objector No.1. Also available if residents who live on the Embankment need to park in front of their properties. Believe this money making initiative will turn our Park into a 'Car Park'. Should consider other alternatives.

This is another ruse for the Council to raise money for the tram as a WPL? Tram is now operational and we have not seen an influx of parked cars near the tram stop.

Response is that provided for objector No.1 with regards to displacement into residential areas.

The Council will also be directing visitors to the free car parking area. This is located just off Felton Road/Wilford Crescent East.

The use of this area does not require contacting the Council's agent and there is no time limit set for using

		this car park.
	OMTRA has spoken to many people regarding the proposals and the overall response is that people do not want to see this implemented.	·
(No.7)	See no evidence at all to support the claim that drivers are increasingly parking cars on the grassed areas. There are areas where grass is worn if this is re-established people will naturally realise they need to not park on it. For a more permanent solution if required, some standard height kerbstone so drivers have to consciously 'climb' them. Or short wooden post would be an alternative and once installed would not need Policing. Makes reference to increased residential parking to avoid pay by phone parking as objector No.1. There is no survey evidence of parking that can be linked to an unofficial workplace parking. Therefore do not believe you can at all justify the extent of proposed changes.	Efforts have been made to stop motorists parking on the grass. It has been found that just erecting signs saying "do not park on the grass" do not carry weight and as such grass cannot establish enough to be a natural deterrent to parking. This was also the case with Wollaton Park, where drivers consistently ignored the signs. With the introduction of an Order at Wollaton Park designating the parking area, tickets have been issued to those parking on the grass and as such the parking levels have dropped. Response is that provided for objector No.1 with regards to displacement into residential areas.
	The scale of charges you propose (if there need to be charges at all, which I dispute) is not appropriate to the current and desired use of the area. Let them have five or six hours from the outset (free parking) that is definitely long enough for leisure use but too short for workplace parking.	Parks are also looking to provide free parking, without the requirement to register with the agent. This free parking area will be signed on site, in order to direct drivers to that location.
(No.8)	Do not feel that this is the best and most thought out method of resolving the parking issues in the area. Nothing has been suggested nor offered to local residents to solve problem of parking on surrounding street to avoid the charge.	Response is that provided for objector No.1 , with regards to displacement into residential areas.

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	Object to the proposals operating 24/7. Do not see that this is reasonable to force paid parking zone for full days or weekends. Option would be to introduce a restricted parking from 8am to 6pm on week days allowing a maximum stay time.	Hours of operation was changed for the public advert so that it operates 8am to 5pm Monday to Friday inclusive.
(No.9)	Ashamed that you as a Council would try to use a gift to the people of Nottingham as such a shameless way to increase revenue and tax the public for simply wanting to experience a quiet and easily accessible part of their City.	With regards to the free parking time, the Authority has listened to the concerns raised by other citizens. As such, it is now proposed that there is 2 hours free parking and that the Order will only operate Monday to Friday 8am to 5pm.
	Also concerned about parking in residential street such as Bunbury & Pyatt Street, where again we already struggle with parking.	Evidence has shown that there are people who park on the embankment for the purpose of work. They are not looking to use the embankment for enjoyment. Without an order this will continue. With an Order and the price for parking being set low, is not to deter drivers, as the Authority is not looking for displacement of vehicles. It is trying to manage the existing parking in this area, deterring people parking on the grass. Sports, Culture & Parks are providing an area totally free for visitors if they do not wish to pay. This will be signed on site. Any money raised will be looked to help manage the parks area.
(No.10)	Area was left to the people of Nottingham by Jesse Boot for their enjoyment. Families take young children to the park, one hour free parking is not long enough. Has any consideration been given to grandparents who may not have the use of a mobile for parking payment?	Comments as those of objector No.9 response to this as above. Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.

	Traffic signs and notices will be detrimental to the whole Park environment. Many citizens of the city use the Park, but because they do not live in the immediate vicinity, have not been informed of your decision to turn it into what amounts to an official car park.	
	Proposing a £2 a day, how can charging for workers improve the parking situation? This is not a logical conclusion. We only allowed 1 resident and 2 visitor's passes. As our home has three adults with cars, who all reside at the property. We do not always have a spare pass for family or friends who visit. What you are imposing will mean them having to pay for parking after 1 hour. A second letter was received re-affirming their objection.	
(No.11)	Lack of parking spaces within the Fraser Rd area, for friends and family similar observations to	Response is that provided for objector No.1 with regards to displacement into residential areas.
	The Spirit of Jesse Boot's gift was that it should be freely available, hence the restrictions in the covenant on profit-making in the area. Concerns to the time limit as raised by pervious objectors above. The problem of parking is not residents or park users but commuters and employees of County Hall.	Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.
	Second email received reaffirming her objections.	
(No.12)	Charging for parking on Victoria Embankment	Response is that provided for objector No.1 identical

	throughout the week will simply have the consequences of moving commuter parking a little further out into the suburbs.	areas. , with regards to displacement into res
	The Council will most certainly go against the spirit of Jesse Boot's deed of gift, and may in fact be acting illegally, and most certainly they will be denying all Nottingham's citizens that most precious of city facilities – some green and open space and the chance to unwind. Do a few £2 charges, against a city budget of millions, justify that loss?	Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.
(No.13)	Concerns that many elderly people may not have mobile phone or carry one at all times. Similar to comments . Would like the council to consider a softer approach and if this does not work move to more draconian measures. Raising the covenant protecting this land similar to Objector No. 10 & 11.	, 2 and 5 and 5 with regards to resident's parking,
	Rising concerns about signs and intrusive camera systems. Suggestion that other things could be considered such as putting in a bid for heritage lottery bid.	
	Additional emails sent regarding Rights of Way and links to the Covenant.	
(No.14)	park on Victoria Embankment for free. If this really is in response to some workers using the	These issues have been raised by previous objectors 1 and 5 and 5 with regards to resident's parking and time limits. The response of the Director is that provided to these

	reasonable to allow say 4 – 5 hours free parking. This would still allow recreational visitors and visitors to residents more time. If I have my toddler son's friends over for a playdate, the proposals mean that all parents would have to pay a fee that would probably preclude the gatherings from happening.	objectors.
(No.15)	Has similar concerns as objector No.1, and has issues with football, cricket & event parking on Wilford Crescent East and Lamcote Grove forcing displacement to other areas such as Bathley St. If proposals go ahead will make it difficult to park on Wilford Crescent East when visiting their mother. Free parking is to short and that the use of mobile devices should be amended to parking tickets issued by a bay at parking meter. In the age of technological advances, we cannot assume	These issues have been raised by previous objectors 1 , 2 , with regards to resident's parking, charges, time limits and mobile phone and discrimination. The response of the Director is that provided to these objectors.
(No.16)	Should consider different options such as:- Notices forbidding parking on the grass, policed by CEOs; Parking restrictions on one side of the road where there are flood defences, policed by CEOs. Readjustment of road markings on stretches containing flood defences walls to indicate 2 lanes, the wider of which is on the opposite side of the road to the parking restrictions. Do Not Charge. If you are determined to increase council revenue, parking charges should apply for a period in excess of 4 hours. Residents of Victoria Embankment should be issued with free permits.	As there is indiscriminate parking has led to damage on grassed verge areas. It is considered, that this Order, would resolve this problem by making sure that drivers only park on the road. Again the approach is not to put down massive amounts of painted parking bays, but to be more subtle with just signing where parking is permitted. Therefore, areas around the war memorial will not allow parking and as a result, this should improve the visual aspect of that part of the Embankment.

(No.17)	You are going to ride roughshod over the original aim of Jesse Boot and others who donated this area for the use of local residents, without making it into a money making racket, with the new pavilion and now parking charges just to boost the councils income when all that's needed is to put restrictions on of only waiting for say 4 hours, as a lot of the cars parked are NTC drivers or commuters who do not want to pay the WPL which I have to pay.	Within the current residents parking scheme on Turney Street there are specifically allocated bays for the NCT bus station drivers to park their vehicles. They have over 100 permits to park in Permit Zone 'B' of the scheme, which removes them from directing conflicting with the residents within the area. This situation has been in existence for over 6 years and has ensured that drivers do not overspill into other areas. However, it is acknowledged that there are commuters parking on the embankment many of them working across the river within the County Council. The intention for charging is to discourage this activity and to give the space to those who wish to enjoy the Embankment. Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.
(No.18)	Raised the issue of the covenant, similar to previous objectors. Also object to mobile phone as discriminates against the elderly similar to Objector No.5. Also there are concerns that there is no published review of the impact of imposing parking charges on the surrounding areas. Second email received confirming objection to stand and pointing out that 20% of the population cannot pay via mobile so the point of your proposal is discriminatory stands.	Comments of the Director as those to objector 2, and 9
(No.19)	It's in breach of the Clifton Conveyance 1897. Specifically the second, third and fourth sections of the description of the Conveyance prohibit these proposed actions and the business of charging	Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.

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	members of the public to park their vehicles on the gifted land would be the breach. Unworthy of the council to seek to raise funds from motorists parking on land gifted to the city residents. The fact that people will need to call a number to even register for free parking will mean motorists will incur a cost even when parking for free and those without mobile phones will be unable to comply.	The cost for contacting RingGo is not added to the price of the parking. The Council has agreed with the agent that the overall cost £2.00, includes the cost of the call. So the driver only pays £2.00.
(No.20)	Register to park, even during the 'free' period by calling a number from their mobile phone. This excludes people who do not own a mobile phone. Also phone call cost money meaning that even the so-called free parking is not free. Made reference to 1897 Conveyance similar to objector 19	Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.
(No.21)	Feel this is in contravention of both Human Rights and the Equality Act. The 84 Act clearly states that parking restrictions can only be introduced to relieve congestion or to prevent obstruction of access to premises. Council does not appear to have provided evidence of either of these two criteria. It is illegal under this Act to raise money from the introduction of parking merely boost the Council coffers.	

(No.22)	Raises similar objection to objectors, 10, 11, Regarding gift and profit.	Issue of Jesse Boot and Gifted land, has been sent to Legal for their advice.
(No.23)	Proposals are based on a Council report, suggesting that drivers are parking to avoid high private parking charges as well as WPL. This is a flawed approach. I park on the embankment near the suspension bridge and use the bridge to go over to work. I do not use it to avoid paying to park. Many people use the Embankment to access West Bridgford.	meant for enjoyment and recreation and not for a car park. The Authority recognises that drivers are using
	A few colleagues park on residential street in West Bridgford. This frequently causes problems with residents. Applying a charge on the Embankment will force many more to park on the streets of West Bridgford. Compounding an already fraught situation and increasing congestion there.	looking at this off-street parking order and if a person does want to use the Embankment to go to work, then by prudent management this can occur in specific areas. The price has therefore, been set to try to
	I will be forced to nearly pay £500. This is basically a work tax. I hear that it will be funding the tram. I live in Gedling and nearest tram point is over 4 miles from my house. The tram is completely useless to me. Park & Ride is not a viable option, nor is the bus service. It would take around an hour versus 20-25 minutes.	The Authority would also be looking at residential street (giving priority to residents) around the Embankment area in the event that there is displacement; this is at the request of local residents and local Councillors. Again the level of charge is not to be so great that it would force users totally out of the Embankment. In fact we would hope to reduce congestion on neighbouring streets by providing this managed facility.
		The Client being, Sports, Culture & Parks has no input into the Work Place Parking Levy. As such it is Sports, Culture & Parks that have asked for this Order, with the intention that they can control indiscriminate parking on the grass verges and grassed areas (reducing damage

		and maintenance costs). Remove parking close to War Memorial, junction and dropped kerbs, to help with safety and accessibility. They are providing free parking in a signed area. But any income generated by this Order will directed back into the leisure services provided by Sports, Culture & Parks
(No.24.)	Not convinced that there is a parking problem. The family has lived there for the last 45 years and has had permitted rights to park without charge in front of the house all of the time except for a few occasions for a forest match or events. At the very least as a resident, there should be free parking on VE at all times and additional parking permits for visitors. We fear that the principal motivation is to raise additional income while at the same time making life more difficult for local residents.	With regards to parking in front of the resident's house, this has been put to Sports, Culture & Parks who are looking at permits. With regards to the residents parking scheme at the rear of the property, the resident is already entitled to up to 3 permits for that scheme, but parking is on a first come first served. Some residents do have off-street garages or parking facilities as well as their permits. Yet they choose to park on street (which is their right), this makes parking on-street at a premium. With houses of multiple occupancy adding to the issues.
(No.25)	To keep Victoria Embankment free from parking charges and the Order OSP 8017 - Paper petition signed by 150 persons. City Councils on-line E-Petition signed by 67 persons Please note, that there is two E-Petitions created by using the same grounds as the Paper Petition. Both have signatories to them.	For the reasons set out with regards to the other objectors to the scheme, the intention of the Order is to control indiscriminate parking on the grass verges and grassed areas (reducing damage and maintenance costs). Remove parking close to War Memorial, junction and dropped kerbs, to help with safety and accessibility. There will be some free parking in a signed area and any income generated by this Order will directed back into the leisure services provided by Sports, Culture & Parks, for the enjoyment of a wide spectrum of citizens not just those within the vicinity of the Embankment.

No.26

Similar comments to objector 1, with regards to displacement into residential areas. And that the Embankment is available if residents who live there need to park in front of their properties. The councils claimed there were safety issues but couldn't cite a single accident or recorded complaint (and the same 'safety' concerns apparently don't exist during event parking when the Council allows cars to park there).

Council's claimed there was a problem with damage to the grass verge – there isn't one!

Council's claims that 'there is plenty of parking on the road opposite' is completely wrong – a fact which would be confirmed by even the briefest of surveys.

Response is that provided for objector No.1 with regards to displacement into residential areas.

Note to Portfolio Holder:

It must be noted that there were six letters of general support for the proposed Order. In some cases they did ask for minor changes to the days and hours of operation. This was done as part of the Advertised public Notice.

- Order to operate; 8am to 5pm Monday to Friday inclusive;
- Two hours free parking (registered with Council's agent);
- Disabled Parking free for three hours (displaying time clock);
- After free period of parking, £2.00 charge for the remainder of the day (to the Council's agent);
- Area set aside for free parking, no requirement to register with the Council's agent;
- Restricted parking area (grassed areas) no parking at any time.

Council agent being: RingGo