

Civil Parking Enforcement: Changes to Parking Permits

Report of the Director of Climate Change, Environment and Transport

Please note that the following recommendations are subject to consideration and determination by the Cabinet (and confirmation under the provisions of the Council's Constitution) before taking effect.

Recommendation: that the Cabinet be asked to:

- (a) note the progress on the Residents Parking Permit Scheme and
- (b) agree the implementation of the Traffic Regulation Order as advertised, except for the recommended reduction in charge for Essential Visitor Permits, and amendments for Exeter Zone S1 and Sidmouth Zone A (as described in Section 4).

1. Summary

Further to the agreement of a new Residents Parking Policy at Cabinet on 9th December 2020, this report sets out the response to the statutory public consultation earlier this year, proposals to make changes to the advertised Traffic Regulation Order (TRO) as a result of the consultation, and the implementation process.

2. Introduction

The Traffic Regulation Order was advertised on 1st June 2022 for a period of one month (closing on 1st July). An advert was placed in the Western Morning News and proposals were also direct marketed to over 14,000 active permit holders (approximately 47% of all permit holders) who had provided email details at time of application. It was considered that a full letter-drop would have been cost prohibitive.

Information was also made available on the Authorities public web pages:
<http://devon.cc/cpetro>

A summary of the proposed changes can be found in Appendix B.

3. Response to consultation

In total 769 responses were received during the advertising period. The most frequently voiced comments by the respondents are summarised below along with officers' responses:

- *Timing and justification for price increases*

It is felt that the price increases to base permit charges ensure the service remains sustainable. The application of the differential charge will ensure that residents consider the number and type of vehicles that they choose to own.

- *Fairness of tiering prices based on car tax bands*

The application of the differential charge will ensure that residents consider the number and type of vehicles that they choose to own. The use of tax bands is transparent and easily understood.

- *Permit abuse and need to better enforce zones*

The proposals will assist in dealing with abuse by ensuring any cancelled or forged permit is immediately identified.

- *Reduction in number of visitors allowed and increase in price*

The original paper one day visitor booklets will remain available for those who wish to use them. The new virtual permits offer greater flexibility by providing visitor parking sessions that can be booked in 1 hour blocks.

- *Opposition to new charges for the essential visitor permit and charges for motorcycles*

It is felt that a charge should be applied to the Essential Visitor Permit to ensure that these remain sustainable, with administration and enforcement to ensure that they are properly used. Motorcycles contribute to emissions and negatively impact air quality within our communities therefore should be subject to a charge for parking.

- *Unfair to those with no online access. Preference for paper permits*

The proposals have been subject to an Impact Assessment and assistance with applications can be provided by our Customer Service Centre over the telephone the same as it currently is.

- *Blocking access to permits to businesses, house in multiple occupation (HMO) residents and students*

Permits will remain available to businesses, HMO residents and students as it currently has been and aligned with our Policy. Provision to new developments and redevelopments has been clarified but applies the same procedure as the Authority has applied since agreement with the Exeter Highways and Traffic Orders Committee (HATOC) Working Group in 2010.

The full summary of responses received to the proposals, including new permit prices and transformation to digital permits can be found in Appendix C along with responses to the points made.

4. Proposed amendments following consultation

The concerns relating to the application of charges for Essential Visitor Permits are understood and it is therefore proposed that these are modified to reduce the cost to £10, this will provide a contribution to their administration, processing and printing.

It is noted that the Exeter S1 zone is unique due to its active times being limited to Exeter Chiefs Rugby Match Days and residents receiving refunds for permit costs from that club therefore it is proposed that paper permits and charges will be maintained.

Sidmouth Zone A also has a unique ruleset on how permits are issued therefore paper permits will be maintained and the differential charge cannot be applied.

5. Implementation

It is proposed to, phase out the issuing of paper permits in favour of virtual permits at the time of renewal for existing permit holders, or at time of first purchase for new occupiers in properties in resident permit zones.

The change over from paper permits to virtual permits would take a year to complete as residents that already hold paper permits would be issued virtual ones upon renewal which is phased through the year. The tiered pricing structure linked to the number of permits held by a property owner and the vehicle's cars emissions (Based upon tax band or engine size for vehicles registered pre-2001) would be implemented at the same time.

Appendix A includes a table explaining the schedule of charges, DVLA tax bands and provides examples of the popular makes and models currently on our roads and which band they fall into.

6. Options/Alternatives

The TRO could be implemented as advertised; however, this would not take into account the feedback received on the charging for essential visitor permits, or the issues associated with the permits in Exeter Zone S1 or Sidmouth Zone A.

7. Strategic Plan

The previously agreed policy position and the proposals to link permit charges to emissions aligns with the Authority's Strategic Plan 2021 – 2025 to address climate change; by encouraging moves towards sustainable lifestyles and use of other modes of transport, which also aligns with the County's Local Transport Plan.

8. Financial Considerations

The proposed increases to permit pricing, shown in Appendix D, will ensure that the service continues to self-fund without additional contributions from other budgets. The permit pricing is not designed to create a surplus but to influence vehicle ownership choices and fund the running and management of the scheme. This includes back-office checks and fulfilment of virtual (and physical) permits, enforcement, along with maintenance of signs and marking in relation to the residents parking schemes.

Income will also be used in part to fund improvements to the technology used by enforcement officers and support additional checks to be undertaken by the back-office.

Virtual permits will improve customer experience and mean that forged or cancelled permits are immediately dealt with. However, the entering of every vehicle registration manually into existing handheld computers does take longer than

standard visual checks of permits. Therefore, investment will be needed in the roll out of new handhelds that can scan registration plates.

New charges will also allow funding to provide for the equivalent of one full time additional officers' time to vet applications received and undertake document checks before authorising new permits and additional enforcement officers to patrol zones. There will be savings in removing the printing and posting of physical permits currently fulfilled by a third-party contractor.

The service should remain self-financing and resilient against the need to rise prices further in the immediate future.

The last time permit prices rose was in 2015, in the past 7 years the Consumer Price Index has increased approximately 19.5%. The increase in base charge for residents parking permits is approximately 17%.

A comparison has been undertaken with neighbouring Authorities (See Appendix E), it is felt that the proposals are proportionate and aligned with similar Authorities. Cornwall is offering permits with a base price of £50 increasing to £75 for a second permit; Somerset offers permits at a base price of £60 (with discounts available for low emission vehicles) increasing to £100 for a second permit.

9. Legal Considerations

In developing and advertising proposals, guidance has been sought from the County's legal team, the proposals presented are compliant with relevant legislation, in particular section 122 of the Road Traffic Regulation Act 1984.

Consideration was given to the appropriateness of a differential charge. As this is intended to reduce ownership, or ownership of higher emission vehicles; manage congestion (expeditious movement of traffic) and improve air quality, this is permissible.

10. Environmental Impact Considerations (Including Climate Change)

The introduction of a virtual permit scheme will benefit the environment by reducing our reliance on bespoke permit paper products. Reduced energy use and chemicals involved in producing our printed stationery will see a reduction in associated carbon emitted during production and supply.

There will be a reduction in the waste associated with the disposal of physical paper parking permits as these are not recyclable.

By utilising a differential pricing structure, the scheme will positively affect a reduction in consumption of fossil fuels in private vehicles by encouraging the uptake of fuel efficient/low emission vehicles and discouraging multiple car ownership. It is hoped more will consider changing the mode of travel or adopt other sustainable modes of travel.

11. Equality Considerations

Where relevant to the decision, the Equality Act 2010 Public Sector Equality Duty requires decision makers to give due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

taking account of age, disability, race/ethnicity (includes Gypsies and Travellers), gender and gender identity, religion and belief, sexual orientation, pregnant women/new and breastfeeding mothers, marriage/civil partnership status in coming to a decision, a decision maker may also consider other relevant factors such as caring responsibilities, rural isolation or socio-economic disadvantage.

This may be achieved, for example, through completing a full Equality Impact Needs Assessment / Impact Assessment or other form of options/project management appraisal that achieves the same objective.

In progressing this particular scheme/proposal, an Impact Assessment has been prepared which has been circulated separately to Cabinet Councillors and is also available alongside this Report on the Council's website at: [Impact Assessment - Residents Parking Policy.pdf \(devon.gov.uk\)](#), which Councillors will need to consider for the purposes of this item.

The equality issues relating to these proposals were considered as part of the report to Cabinet in December 2020 seeking approval of the new Residents Permit Parking Policy and permission to consult on changes to digital permits and tiered emission-based charging.

Concerns raised in the consultation regarding lack of access to online facilities to buy and manage an online account will be overcome by the customer contacting the Council's contact centre or MiPermit helpline where an advisor will process an application on their behalf.

The first permit bought at any address will be £35, the emission tier prices apply to the second permit. Residents can choose to put whichever vehicle is kept at that address in the higher car tax bands as their first permit which should assist in mitigating against the new permit costs.

12. Risk Management Considerations

This proposal has been assessed and all necessary safeguards or action have been taken/included to safeguard the Council's position.

No risks have been identified.

13. Public Health Impact

This proposal has been assessed and all necessary safeguards or action have been taken/included to safeguard the Council's position.

No risks to public health have been identified only benefits arising from cleaner air and reductions in carbon.

14. Summary

It is recommended that the changes to the advertised TRO as outlined in Section 4 are an appropriate response to the consultation. The concerns over the increase in permit cost are noted. However, these are justified to ensure a sustainable service going forward and to encourage uptake of lower emission vehicles.

Meg Booth
Director of Climate Change, Environment and Transport

Electoral Divisions: All

Cabinet Member for Highway Management: Councillor Stuart Hughes

Local Government Act 1972: List of Background Papers

Contact for Enquiries: Christopher Rook

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Background Paper	Date	File Reference
Nil		

The above mentioned Reports are published on the Council's Website at:

<http://democracy.devon.gov.uk/ieDocHome.aspx?bcr=1>

Civil Parking Enforcement Changes to Parking Permits - Final

Appendix A to CET/22/46 – Schedule of Proposed Charges

Emission Band		Pre-2001 Engine Size		Post 2001 Emissions (CO2g/km)	Charge 1 st Permit	Charge 2 nd Permit	Charge 3 rd Permit	Examples of Vehicles
1	A	Electric & Ultra Low	Up to 900	Up to 50	£35	£45	£65	All battery electric vehicles e.g., Nissan Leaf, Tesla models, BMW I models, VW e-Golf, and some hybrids e.g., Passat Hybrid, Mercedes C/E 330e models, Toyota Prius Plug in
2	A	Low	901 to 1399	50 to 100	£35	£35	£35	Most hybrid models, e.g., Toyota Prius, Yaris & Auris, Range Rover PHEV and most small petrol and diesel vehicles, e.g., Ford Fiesta, Focus (newer models), Vauxhall Corsa, Astra, Kia Ceed, Peugeot 308, Renault Megane, Clio, BMW 1 series etc.
3	B-F	Medium	1400 to 1850	101 to 170	£35	£55	£65	Audi A2,3,4 & 5, BMW 2, 3 4 series (smaller engines), Ford Focus 2.0, Mondeo, Mercedes A, C, E class (newer 180d, 200d and 220d models), VW Golf, Jetta, Hyundai i30, Kona, Seat Leon, Ibiza, Citroen C3, C4, Berlingo, etc.

Emission Band		Pre-2001 Engine Size		Post 2001 Emissions (CO2g/km)	Charge 1 st Permit	Charge 2 nd Permit	Charge 3 rd Permit	Examples of Vehicles
4	G-K	High	1851 to 2500	171 to 225	£35	£55	£65	BMW 2,3,4 series, X2, X3, X4, X5, VW Touareg, Tiguan, Audi Q7, Q8, Porsche 911, Cayenne, Land Rover Range Rover & Discovery (sport models). Mercedes E350, GLC
5	L-M	Very High	Above 2500	Above 225	£35	£65	£65	Jaguar F-Type V6, Jeep Wrangler 2.8, Mitsubishi Shogun 3.2, Mercedes AMG 63 models, Bentley models, Rolls Royce models, Ferrari models, Maserati models

Appendix B to CET/22/46 – Summary of Proposals

Permit Type	Proposed Changes
Resident Permit	<ul style="list-style-type: none"> • All future permits will be issued virtually • Prices increased and variable depending on vehicle emissions <ul style="list-style-type: none"> ○ Tier 1 vehicles - Band A (less than 100g/km) (first permit £35, 2nd permit £45, extra permits* £65) ○ Tier 2 vehicles - Bands B – K (101-225g/km) (first permit £35, 2nd permit £55, extra permits* £65) ○ Tier 3 vehicles - Bands L - M (226+ g/km) (first permit £35, 2nd permit £65, extra permits* £65) • Permits will be required for Motorcycles (first permit £35, 2nd permit £45, extra permits* £65) but these will be in addition to the resident permit allocation • Refunds will be issued for part used virtual permits • All residents permits in Salcombe will apply all year *where applicable
Business Permits	<ul style="list-style-type: none"> • All future permits will be issued virtually • Price for first permit increased to £35 • Price for Exmouth (A Langerwehe Way) business occupier permits and charity business permits increased to £35 for each permit • Supported living and school business permits introduced at charity business permit rate • Refunds will be issued for part used virtual permits
Visitor Permits	<ul style="list-style-type: none"> • Introduction of virtual visitor permits which will be available as an alternative to the physical permits <ul style="list-style-type: none"> ○ £30 per batch of 350 hours (allocated in 1 hour sessions) for schemes operating at all times (24hr/7days) ○ £30 per batch of 200 hours (allocated in 1 hour sessions) for schemes not operating at all times • Virtual visitor permits will be required for Motorcycles • Refunds will be issued for part used batches of virtual visitor permits
Essential Visitors Permit	<ul style="list-style-type: none"> • Introduction of charge (£35)
Guest House / Hotel Permits	<ul style="list-style-type: none"> • All future permits will be issued virtually • Permits to be changed to apply for 24 hours from the point of activation • Refunds will be issued for part used batches of virtual guest house/hotel permits
All Permit Types	<ul style="list-style-type: none"> • Proof / documentation will be required to be uploaded/supplied for all applications
Other Changes	<ul style="list-style-type: none"> • Exemption for Car Club vehicles from Residents Parking restrictions (including limited waiting and pay & display with exemptions for residents permit holders) • Minor article changes to provide clarification to aid enforcement and the issuing of permits

Appendix C to CET/22/46 – Summary of Comments Received

Devon County Council (Traffic Regulation & On-Street Parking Places) Amendment Order - Ref 5868

Comment	No. of People	County Council Response
RESIDENTS PERMITS - All future permits will be issued virtually		
No justification given for the change.	1	A new Residents Parking Policy was agreed by Cabinet in 2020. The policy acknowledges Climate emergency and introduces steps to help reduce the carbon footprint of the County. The new system will also address concerns regularly expressed about permit abuse by bringing back 'approval' of supporting evidence of residency.
Supports the introduction of virtual permits.	89	Thank you for supporting the proposal.
Would prefer to keep paper system.	19	A new Residents Parking Policy was agreed by Cabinet in 2020. The policy acknowledges Climate emergency and introduces steps to help reduce the carbon footprint of the County. The new system will also address concerns regularly expressed about permit abuse by bringing back 'approval' of supporting evidence of residency.
A non-digital option should exist still.	18	
Will there be support to assist people in the initial purchase and set up.	1	Yes. The contact centre team and MiPermit Devon team will happily assist with setting up accounts with customer. MiPermit operate 7 days a week. Our contact centre is open Mon – Fri 8am to 8pm and Sat 9am to 1pm.
How will the virtual scheme work for Holiday Lets?	2	If the address is already eligible for permits then the account holder/owner will be in control of the account. They will need to record their guest's registration number and start and end date of that guest stay online or via the app.
Will I be able to change vehicle regs regularly for hire cars/different work vehicles?	2	Yes. Account holders will be able to self-serve and change their own permit details. Changes made will update in real time.
Is S1 included and will refund still be available Exeter Chiefs.	3	After further consideration, due to its specific times of operation and refund agreement with the Rugby Club, it is recommended that Exeter Zone S1 retains paper permits.
Is Fortfield Terrace, Sidmouth affected?	1	Due to its unique ruleset, it is recommended that Sidmouth Zone A (Fortfield Terrace) retains paper permits.

Comment	No. of People	County Council Response
Concerns raised that the scheme will be open to more abuse visible permits should still be retained.	32	<p>What The Council is proposing is already in use by many of the local councils across England and in particular in larger City resident parking areas. There is no evidence available that supports the concerns being voiced about more people will 'chance parking' and abuse parking permit areas due to the removal of the requirement to display a permit.</p> <p>Use of smart technology will quickly find non-permit holders and a Penalty Charge Notice will be issued where required.</p>
How will the virtual scheme work for second homeowners/room renters/landlord?	4	<p>Landlords are not eligible to use the permits of addresses they let. The tenant is eligible for permits. A landlord may apply for a trade permit instead.</p> <p>Second homeowners can still have access to permits for their property if they do not let it out when not in use by them.</p>
Without paper permits how can residents know if a vehicle parked in the area has a valid permit/prefer to have a visible permit alongside a virtual one to show valid permit held.	70	<p>The Council has an online "Report it" form for suspected permit abuse. We welcome feedback from residents and every allegation is checked and if found to be true permits are cancelled.</p>
Will there be an email reminder.	1	<p>Yes 30 days before the permit's expiry date.</p>
Concerned about data integrity.	2	<p>The software supplier to be used for this project is PCI level 1 accredited for its system security. Data gathered will remain covered by the services existing data privacy notice.</p> <p>As with any online form, the data captured is reliant on the person entering that data to do so accurately and honestly.</p>
RESIDENTS PERMITS - Price increases		
Higher band rates for multiple/more polluting cars.	22	<p>The current advertised order can't be modified in this way. However, this could be considered in the future.</p>

Comment	No. of People	County Council Response
Blue badge holders should have free permit.	1	<p>There is no requirement to hold a permit if the resident holds a blue badge.</p> <p>However, the Council does recommend on its website that one is bought if the resident frequently travels in other vehicles and takes their badge with them when doing so to park at their destination.</p>
Does not think costs increase is justified for a third vehicle.	1	Tiered pricing has been used for some years with business permits. With pressures on available road space and the need to reduce reliance on car ownership, this is an effective and proportionate method encouraging private car ownership to be reduced.
Third permit for tier 1 to 3 should not be allowed at all regardless of cost.	2	In most schemes a 3rd permit is only offered to residents that lived in the area at the time the scheme was introduced and had more than 2 vehicles at that time. This is a standard agreement when a new scheme goes live, and the allowance is removed when the resident moves out or reduces the number of vehicles.
Scheme nothing more than money making scheme.	68	Schemes do cost money to implement, maintain and enforce them. The money raised through resident parking goes towards these costs. Any surplus is used to support local traffic order changes requested by communities and local transport improvements.
Objects to price increase as virtual permits don't need posting (Should be cost neutral).	40	As the proposal calls for the Council to run both a paper-based offer and a virtual permit scheme, there is no immediate reduction in costs to the Council. Investment in new IT and bringing back document checking are new costs. It is anticipated that the costs will be offset by reductions in paper permits costs in year 2. The wider the uptake of digital permits the more quickly the scheme becomes sustainable and will help delay further increases in charges being required.
Cost saving incentive for lower emission-based vehicle should be introduced.	1	Lower costs for low emitters or EV's would not contribute sufficiently to the maintenance or enforcement of such schemes. Keeping the first permit per household cost to just £35 is a fairer starting point for charges at this time.
New charges should only be for new residents.	1	This would be discriminatory and impossible to manage fairly. It is felt that this would not be appropriate.

Comment	No. of People	County Council Response
Increase in costs should not apply to one vehicle households only multi vehicle households.	2	The last price increase for permits was in 2015 when they rose from £20 to £30. The charge of £35 is equivalent to a 2% increase year on year since 2015.
More should be done to charge commuter and visitors not passing additional costs to residents.	12	This would be a matter for consideration by the City and District Councils who set charges for use of off-street parking. For many communities it is visitor spending that supports that community, and they would not wish to see anything that would discourage visitors and their spending.
Discrimination on those who do not have access to driveways, people who have driveways and polluting cars get away with not paying for permits.	13	This proposal is about only changes to the ways permits will be issued and charges for permits. It is no more or less discriminatory than the current system.
This proposal is Anti-motorist.	2	Nothing in the proposal is anti-motorist. There are no reductions in permit allocations being proposed. Charges for permits will be slightly higher but motorists will have greater flexibility in self-managing their own permit allocations to suit their individual needs.
Residents of a higher council tax band property should be charged a further enhanced rate.	1	The additional administration to implement this would be overly burdensome. This amendment couldn't be accommodated in this order at this time. The focus of this intervention is on vehicle choice and emissions.
Residents will be paying more without any improvement to being able to find a resident parking space available to use.	39	The investment in technology and some of the additional income will be used to support further enforcement of the resident zones. This will reduce the number of vehicles parking without a permit and better manage non-residents parking which should help with parking capacity across the zone.
RESIDENTS PERMITS - Variable prices depending on vehicle emissions		
Vehicle should be charged by length not emissions.	4	Interesting concept, but not easily audited. The V5C information and .GOV website does not state vehicle length.

Comment	No. of People	County Council Response
Emissions based charging poorly thought out.	7	The Council has investigated how other Councils have looked to address the Climate emergency and have found that most have adopted or are looking at using 'nudge' techniques including charges based on current emission bands. This mirrors in some way the Government plans to see reductions in emissions through switching to cleaner EV or hybrid vehicles. The concept of charging based on emissions is one in the public domain and represented by the varying prices paid for road fund licence (car tax) paid.
Prices too cheap if you want to change car use to tackle climate changes.	5	Many of the comments received against these proposals are stating that these charges are too high and would cause further financial hardship in the current economic climate. Devon permit prices are historically low in comparison to other authorities but reflect the difference between the towns where these schemes operate. All pay the same price for permits with a few specific exceptions e.g. the Exeter S1 zone which only applies on match days.
Emission based charges for resident parking permits make no sense. Parked cars do not emit anything.	37	The concept of charging based on emissions is one in the public domain which drivers will be familiar. Currently represented by the varying prices paid for road fund licence (car tax) paid, using a similar concept provides parity. The current charge for permit is for providing a permit, maintenance, and enforcement of the schemes, we do not levy a charge to park on the road. The new charges also are not a parking levy, the funds raised will still be used to pay for the permit services, enforcement and maintenance of the schemes.
Permits for electric cars/zero road tax vehicles should be free or lower cost.	14	Free permits for EV's would not contribute anything to the maintenance or enforcement of such schemes. Keeping the first permit per household cost to just £35 is a fairer starting point for charges.
People with two low emission vehicles are they still subject to the tier rates.	2	Yes, in the current proposal.

Comment	No. of People	County Council Response
Emissions based charging discriminates against those who have and need to have larger vehicles who already pay higher road tax and insurance to do this.	35	The Council did conduct an impact assessment in 2020 on this matter. The first permit issued being a flat charge of £35 is in recognition of the impact on adopting a solely emission-based charging structure. This is an equitable solution to 'nudge' residents towards using cleaner vehicles when they can.
Emission scheme may be discriminatory or unreasonably impact on lower income households to those who cannot afford electric vehicles/lower emission vehicles/or work vehicle is high emission.	118	The Council did conduct an impact assessment in 2020 on this matter. The first permit issued being a flat charge of £35 is in recognition of the impact on adopting a solely emission-based charging structure. This is an equitable solution to 'nudge' residents towards using cleaner vehicles when they can.
Scheme should not be used to influence a green agenda, other methods should be used to discourage car use and ownership.	8	The Council has already declared a climate emergency and committed to reducing greenhouse gasses. This proposal is primarily about embracing new technology and reduction in waste and raw materials to make the schemes sustainable priced in future years. It is a 'nudge' for residents to consider reducing car ownership or moving to cleaner modes of transport as part of the bigger picture for tackling climate change.
Emissions schemes will not change behaviour or reduce vehicles on the road.	7	It is a 'nudge' for residents to consider reducing car ownership or moving to cleaner modes of transport as part of the bigger picture for tackling climate change. The Council accepts that this move will not happen overnight and for some will be a longer journey to changing personal behaviours.
People who have only 1 car which may be high emissions will still only pay the lower amount, how does this discourage removing high emission vehicles.	2	Noted, it is accepted that buying a newer vehicle is not an option for some drivers, and this was an equitable solution to 'nudge' towards cleaner vehicles.

Comment	No. of People	County Council Response
Why are all vehicles charged the same for the first vehicle regardless of emissions.	8	The first permit issued being a flat charge of £35 is in recognition of the impact on adopting a solely emission-based charging structure. This is an equitable solution to 'nudge' residents towards using cleaner vehicles when they can.
Unsure how vehicle category and tier system works.	28	<p>In most schemes a typical house can have 2 resident permits. 1st permit bought will cost £35 2nd permit bought will cost £45 or more depending on what car tax band it falls into based on the CO2 it emits or engine size if the car is a pre 2001 model. Car tax bands are A – M and what you pay will correlate to what you will be charged for your permit. https://www.gov.uk/vehicle-tax-rate-tables</p> <p>Owners of older cars or those with higher CO2 emitting engines may well choose that vehicle for the 1st permit where the price is fixed at £35.</p> <p>The proposed order sets out the charges which will apply to those addresses with grandfather rights to have more than 2 permits and have the use of 3 or more permits at their address.</p>
Why is there an increase in charge for second vehicle.	2	It is a 'nudge' for residents to consider reducing car ownership or moving to cleaner modes of transport as part of the bigger picture for tackling climate change. The Council accepts that this move will not happen overnight and for some will be a longer journey to changing personal behaviours.
Emission based will not work, as those who can afford more expensive vehicles anyway will not notice the increase.	1	Noted, but the Council accepts that for some more affluent drivers permit charges are less of a consideration when buying a newer vehicle but this proposal is an equitable solution to 'nudge' towards cleaner vehicles.
Emissions based scheme will be abused as people will put their "dirty" vehicle as their first permit.	2	Yes, this has been considered but this was an equitable solution to 'nudge' residents towards using cleaner vehicles when they can.

Comment	No. of People	County Council Response
Opposed to variable pricing. All permits should continue to be the same price as it could lead to family disagreement over who pays the lowest price.	34	The Council notes these comments but the decision on which order permits are bought are matters for the individuals, not the Council.
RESIDENTS PERMITS - Motorcycles will require permits		
Motorcycles should be charged.	9	<p>Motor-cycle owners used to park in between other cars at the roadside, but it is more common now for motor bikes and scooters to be left parked parallel to the kerb to prevent damage to the bike from passing or manoeuvring vehicles.</p> <p>If a bike is taking up the equivalent space to a small car when parked parallel, it is not unreasonable to expect them to also pay for a permit at the lowest charge to occupy that road space.</p> <p>The technology now exists to make this equitable to those car owning residents. Previously it was not reasonably possible for a permit to be securely affixed to a motorcycle.</p>
Motorcycles should not be charged at all.	38	<p>The technology now exists to make this equitable to those car owning residents. Previously it was not reasonably possible for a permit to be securely affixed to a motorcycle.</p> <p>Motor-cycle owners used to park in between other cars at the roadside, but it is more common now for motor bikes and scooters to be left parked parallel to the kerb to prevent damage to the bike from passing or manoeuvring vehicles.</p> <p>If a bike is taking up the equivalent space to a small car when parked parallel, it is not unreasonable to expect them to also pay for a permit at the lowest charge to occupy that road space.</p>
Motorcycles charged at same rates as vehicles but emit less, price should be lower.	11	The price of £35 applies to the first permit per house. It was felt by the working party that this was a fair and equitable price to be applied for motorcycles.

Comment	No. of People	County Council Response
Motorcycles should not be an extra permit for the household and should be included in original allocation of two.	1	Motorcycles generally are more environmentally less damaging than cars. To assist those for whom a switch to 2 wheels is an option the additional permit was seen as a small incentive to make that switch to greener travel.
RESIDENTS PERMITS - Refunds will be issued for part used virtual permits		
Refund should be on days rather than calendar month.	1	The permit charges do not equate to a payment to park on the road. The plans to allow for refunds for digital permit holders will mirror the current road fund licence refund criteria and be calculated on a calendar month basis. Paper based permits will not be eligible for a refund at all unless returned unused.
RESIDENTS PERMITS - Residents permits in Salcombe will apply all year		
No comments received.		
RESIDENTS PERMITS – Other Issues		
Students should not be bringing their cars/Student problems.	47	It is not possible to prevent all students from bringing a car to the University. Courses that include a work placement means that other local travel is necessary. Buses and trains may not be available at times work placement requires the student to be in attendance.
Limit parking permit use to properties in a named road rather than zoning.	1	Individual roads may not have sufficient parking spaces to meet the needs of residents. Zoning offers more choices for residents and increases likelihood of finding a space near to home address.
A cap on resident permits available for HMOs.	3	A cap exists already. Our Policy sets out limits for HMO's created after a zone has been introduced. Maintains the single house max of 2 permits or removes all permits from the address.
Higher band should be restricted after 6PM.	1	Trade permits will only be used by a contractor whilst working at a property. That may include working after 6pm to do emergency repairs or finish off work to a deadline.

Comment	No. of People	County Council Response
Blue badge holders should not be exempt in residential and shared use bays.	2	The blue badge scheme affords an exemption to park all day in limited waiting or pay and display spaces, that is not the Council's decision. It was decided to standardise an exemption to blue badge holders in all residential zones across the County as there were different rules for zones even in the same town which was confusing and unfair. To be equitable the exemption for blue badge holders was applied to all zones by amending the traffic order in 2010. The exemption has been applied to all new zones introduced since that date as well.
Would like more permits to be allowed for residents of the Exeter S1 Zone.	3	The number of permits issued is not part of this proposal or under consideration at this time.
Lack of viable alternatives to cars/encouraging alternative transport.	37	The County Council uses money raised through on-street parking charges to support local transport and travel schemes. Improvements to local rail services and additional stations are coming. Park and cycle proposals and changes to local bus timetables are improving alternative travel options. Use of a private car is often the easy choice.
Reduce eligibility to one permit per household.	9	There are no changes planned to decrease the number of permits allowed per property at this time.
Should be no more than 2 permits per household.	10	There are no changes planned to amend the number of permits allowed per household.
Should offer a Household permit system 1 permit multiple cars registered to it.	3	The digital system will allow an account holder to manage all permits issued to that address, but only one VRM can be on a permit at a time.
Why are you allowing more permits per household under this scheme.	10	We are not increasing the number of permits per property. The pricing structure shows the price that will apply to an existing address which has a grandfather right to use a 3 rd ,4 th or 5 th permit.

Comment	No. of People	County Council Response
Some properties have more permits than normal eligibility/Being obtained by family members who live elsewhere.	2	The Council has a Report it form for suspected permit abuse. We welcome feedback from residents and every allegation is checked and if found to be true permits are cancelled.
Properties outside of schemes will not be charged for more than one vehicle or emissions.	5	This is the current case. If you don't have parking restrictions then enforcement is also not required.
Permits should only be issued to Council tax-payers rather than current eligibility.	4	Permits are issued to residents living within an eligible property. In some properties the landlord will be responsible for paying council tax and in others the council tax rate is £0, It would not be appropriate to withhold the issue of a permit based on the applicant not paying Council tax.
More permits should be available for tenants of city centre properties.	2	The permit zones are defined in the traffic regulation order. There is very little resident only parking spaces and most of the newer developments are designated car free by the City Planning Department in line with their policies.
Second home-owners should not have access to permits or should pay higher rates.	1	DCC do not have access to Council Tax data so have no means of checking whether a property is in use or classed as a second home.
Non-resident based vehicles/ e.g. trades/company vehicles/care workers/ taking up spaces preventing access for residents.	24	Care workers and tradespersons need to be able to access spaces for short durations of time. Residents that bring company vehicles home must use one of the 2 permits for the address.
Car sharing, more than owner permit should be allowed.	1	The terms and conditions of use of a permit require the permit to be registered at a property address with the DVLA. Insurance also requires owner to state where the vehicle is kept overnight. As neither allows more than one address we cannot allow more than one permit to be issued. Even though car sharing does help to reduce car ownership and lower CO2 in theory.

Comment	No. of People	County Council Response
People already abusing existing scheme.	19	The Council has a Report it form for suspected permit abuse. We welcome feedback from residents and every allegation is checked and if found to be true permits are cancelled.
Does not think that there is/will be sufficient policing or enforcement/ insufficient patrols or officers.	75	The investment in technology and some if the additional income will be used to support further enforcement of the resident zones. The new Tech allows the enforcement team to revisit its current planned beats and change the way it deploys its officers. Recruitment since 2020 has been challenging and resources have been severely stretched. Nevertheless, Resident parking zones have been regularly visited and the team expect to be able to provide more focus on this as Civil Enforcement Officer (CEO) numbers return to normal levels.
Scheme will not alter or change not being able to find parking near or outside own home.	32	This is true. These proposals do not change existing zones or the numbers of spaces available in the zones.
Not in a resident zone.	2	This is a solution to 'nudge' residents towards using cleaner vehicles when they can. Other schemes and projects will also encourage modal shift to other forms of sustainable transport for those not in residents' parking zones.
Permits should also be usable in off-street car parks.	4	Off-street car parks are the responsibly of the City or local District Councils and permission to park in them is outside the jurisdiction of this council. It is worth highlighting that those Council's rely on parking fees to support services so are not willing to see spaces occupied by resident permit holder and not receive a payment for the use of that space.
Implement a ULEZ/congestion charge.	2	That is currently outside the scope of this proposal and not being considered at this time. It would be a matter for wider consultation in conjunction with Exeter City Council.
Higher fines for persistent non-permit rule followers.	1	Fine Charges are set by Department for Transport.

Comment	No. of People	County Council Response
Should implicitly remind people that there is no automatic right to park outside your house/ in your street.	1	The information we publish on our website does carry that message. The Council has no statutory obligation to provide parking. It is a tool we use to manage traffic to ensure safe passage of vehicles on the road network.
Will the change happen straight away.	9	Existing permit holders will be issued a digital permit and see price increase at their next renewal date once the traffic order is implemented. New applicants will be using digital permits and pay new charges from their first application.
BUSINESS PERMITS - All future permits will be issued virtually		
No comments received.		
BUSINESS PERMITS - Price increases		
Should be more expensive.	1	This is a 'nudge' to change behaviour and choice of vehicle type and ownership.
BUSINESS PERMITS - Supported living and school business permits introduced at charity business permit rate		
No comments received.		
BUSINESS PERMITS - Refunds will be issued for part used virtual permits		
No comments received.		
BUSINESS PERMITS – Other Issues		
Business Permit holders should find alternative parking.	2	Business Permits are intended to be used solely in vehicles actively engaged in business related activities, not just to get the holder to their place of work. Please report any misuse of these permits via the web form.
More business permits needed for staff.	2	Business permits are not available for staff to commute and park near their place of work.
VISITOR PERMITS - Introduction of virtual visitor permits		
Will virtual permits operate in real time (for example from the time entered).	2	Initial permits will be subject to approval by the Council, but once the account has been approved future permit issues and renewals operate in real time. Visitor sessions will work in real time unless the account holder sets an alternative start date and time.

Comment	No. of People	County Council Response
<p>Cost of visitor permits doubling/ price increase.</p>	<p>108</p>	<p>There is a £5 increase for an allocation of permits.</p> <p>Instead of two books of 30 all day permits being issued, a resident can have two allocations of visitor hours. These are 2 x 350 hours in zones that apply all the time, and 2 x 200 hours in zones that apply between set time and on set days.</p> <p>Some residents have done the calculation of 24 hrs x 60 days = 1440hrs and think that the lower number of hours being suggested equates to a price hike for less time.</p> <p>The revised numbers were reached after considering the amount of time most visitors actually spend at an address being less than 4 hours (unless staying for holidays/weekends where whole days are used).</p> <p>A paper permit is required for each visitor no matter how long they stay (30 minutes or all day). This limits a resident to 60 visitors per year.</p> <p>A digital permit is only needed when the visitor is present (in multiples of 1 hourly sessions) and therefore could allow the resident far more than just 60 visitors a year.</p> <p>Hours do roll over to the next calendar day, and unused hours can be rolled over into the next calendar year.</p> <p>The resident can have more than one visitor at a time and can forward date start date and times.</p> <p>The option of paper permits will still be available to residents for those that wish to maintain the existing arrangement, or they may have 1 book of paper permits and batch of digital permits.</p>
<p>Reduction in maximum available hours from 720 to 350 with swap from paper to virtual.</p>	<p>41</p>	<p>See above.</p>

Comment	No. of People	County Council Response
What is happening with S1 Visitors?	10	After further consideration, due to its specific times of operation and refund agreement with the Rugby Club, it is recommended that Exeter Zone S1 retains paper permits.
More abuse, as people will leave the vehicle parked over the time paid for as will know that there is insufficient officer coverage to enforce.	7	The investment in technology and some of the additional income will be used to support further enforcement of the resident zones. The new Tech allows the enforcement team to revisit its current planned beats and change the way it deploys its officers. Recruitment since 2020 has been challenging and resources have been severely stretched. Nevertheless, Resident parking zones have been regularly visited and the team expect to be able to provide more focus on this as CEO numbers return to normal levels.
Concerned that switch to Virtual Permits will reduce the number of hours that visitors can stay.	25	Whilst fewer hours than allowed for by the scratch card permit appears to being allowed, the fact that the account holder can allocate sessions by the hour rather than by the day will generally allow for more visitors per year rather than less. However, the option of paper permits remains for those that wish to maintain the current arrangement.
Hard to administer such as recording times and predicting departure times in advance/monitor visitor permits on an hourly basis.	17	The account holder or resident can use the app or go online to book a visitor session for any number of hours they want. The minimum is 1 hour but can be as many as the resident wants for their visitor. Additional hours can be added if the original booked session proves to be not enough time.
Would like 1/2 day and full day virtual visitor permits.	1	The account holder or resident can set the number of hours they wish a visitor session to last. As schemes start at different times and apply for different hours there is not a standard half daytime for a permit to end.
System security/privacy of information.	7	The software supplier to be used for this project is PCI level 1 accredited for its system security. Data gathered will remain covered by the services existing data privacy notice.

Comment	No. of People	County Council Response
Significantly increase in cost.	29	<p>These proposals were first agreed by the Cabinet in Dec 2019, pre-pandemic, Brexit and with no expectations of a conflict in Europe affecting supply chains and prices.</p> <p>The last price increase for permits was in 2015 when they rose from £20 to £30. The new charge of £35 is equivalent to a 2% increase year on year over the period between 2015 and 2022.</p>
Uncertain on how the visitor permits will work and are residents responsible for allocating virtual permits to visitors?	39	<p>The account holder or resident can use an app or go online to book a visitor session for any number of hours they want. The minimum is 1 hour but can be as many as the resident wants for their visitor. It is also possible to have more than 1 visitor at a time.</p> <p>Visitor permits either paper or digital are issued by the resident or account holder.</p> <p>They are and always have been responsible for ensuring their visitors display a valid permit whilst parking at the property. However, if a PCN is issued, the liability for the fine rests with the driver or registered keeper of that vehicle.</p>
Concern about the application process.	3	<p>This will be an online form via the parking web page but once set up can be managed via a free app. Bands will be applied by registration number by the system and correct price assigned. Documents can be uploaded by attaching to the end of the application before submitting for approval. Files accepted will be photo's, Word documents or PDF and Jpegs.</p>
Can I still use existing paper scratch cards post go live.	31	<p>Yes. Any previously issued paper scratch card books will remain valid until each individual card has been used.</p>
Scheme is more complicated.	5	<p>The scheme is more complicated to explain in words than it is to do when applying for a permit. It is a similar process to paying for parking spaces via a parking app e.g. RingGo. MiPermit already provide services to over 100 local councils across the Country.</p>

Comment	No. of People	County Council Response
Supportive of proposal as it will assist managing visitors better.	6	Thank you.
Having to provide proof of residence before receiving a permit is an inconvenience.	2	Whilst providing proofs will delay matters at first time of application, it is a step that is only required at time of creating an account or when you change address and buy a first permit for that address. Photos of proofs can be taken and uploaded from a smart phone as part of the online process. The reintroduction of this step addresses a lot of concerns raised by residents about permits being obtained falsely and demonstrates the Council's commitment to operating effective resident parking controls.
What if you do not have a printer.	2	A printer is not required. No permits require printing and copies of documents can be sent via other formats.
Would like to retain physical visitor permits.	39	There will be an option to have continue using paper daily visitor permits for those that wish to do so.
VISITOR PERMITS - Virtual visitor permits required for Motorcycles		
No comments received.		
VISITOR PERMITS - Refunds will be issued for part used virtual permits		
No comments received.		
VISITOR PERMITS – Other Issues		
Should have access to more than 2 visitor permit books per year.	2	There are no plans to increase the number of books being issued per year, however use of the digital permit does afford the user more visits per year.
People outside of permit areas can have visitors park for free, mine have to pay.	1	The residents' permit scheme was implemented to reduce non-resident motorists from parking in the area. This benefits the residents by reducing the demand on the available parking spaces. The cost of the permits goes towards the cost of implementing the scheme, maintenance and enforcement.
Emergency trades parking should not be part of allocation.	1	Emergency trades are exempt whilst making safe a site. They also have access to their own permit to undertake repairs.

Comment	No. of People	County Council Response
I do not own a car but still have to buy visitor permits so financially disadvantaged.	1	The residents' permit scheme was implemented to reduce non-resident motorists from parking in the area. This benefits the residents by reducing the demand on the available parking spaces. The cost of the permits goes towards the cost of implementing the scheme, maintenance and enforcement.
No visitor permits should be permitted in centre of Totnes.	1	This would be discriminatory to the residents in the area who want to have visitors to their property and the current proposals make no provisions to change the current TRO in terms of entitlement to permit types.
How do trades peoples manage when visiting clients.	4	The Council offers a separate trade permit to tradespeople to exempt their vehicles whilst working at a client address.
ESSENTIAL VISITOR PERMITS - Introduction of a charge of £35		
Stop non-resident nor essential visitors to parking and make them pay for a day rate.	1	The essential visitor permits provides enormous benefit to the resident and peace of mind. The proposal calls for a charge to be made for this permit so that all household pay for a permit. There are no plans to stop the issue of this permit to those in genuine need of it.
Carers now have to pay, has equality impact assessment been carried out.	2	Yes, an equality impact assessment was carried out before being taken to Cabinet. The EVP is provided for those who rely on family members to provide the care/ support to enable the person to remain in their own home. The Council has a separate Care & Health worker permit scheme for those employed in social care or as care workers and those eligible for that permit receive it free of charge.
Will EVPs still be paper.	2	Yes, this permit will remain paper based as it is not issued to a specific vehicle registration number.
EVP should be better regulated rather than charged for.	1	With the new permit proposals, the EVP will no longer be auto renewable. Permit holders will need to apply annually to demonstrate they are still eligible for a permit. Anyone with a valid Blue Badge will automatically be eligible. Non badge holders may be asked for supporting proofs from Doctors or for childcare use, birth certificates.

Comment	No. of People	County Council Response
Implementing charges to EVPs will prevent abuse.	1	Permit holders will need to apply annually to demonstrate they are still eligible for a permit. Anyone with a valid Blue Badge will automatically be eligible. Non badge holders may be asked for supporting proofs from Doctors or for childcare use, birth certificates. A charge will allow the service to remain sustainable.
Would like to see an extension beyond the age of 5 for childcare EVP.	1	Our Policy is that EVP shall be available to all residents (at eligible) addresses who provide evidence of a need for regular visitor support to care for an ailing or disabled resident in the zone. It is not considered appropriate to extend eligibility further for childcare at this time.
Can they stay free or at a lower price than other permit types.	2	It is not unreasonable to expect every household in a resident zone that uses a road space on a regular basis for parking to contribute to the costs of issuing a permit and the enforcement and maintenance of a scheme.
Additional costs on childcare requirements will be a further burden for families.	9	
Why do people who already need support in their home have to be faced with the burden of paying for a permit.	46	None the less, as no charge has previously been made for Essential Visitor Permits it is recommended that the charge for an Essential Visitor Permit is set at £10 to provide a contribution to administration, printing and enforcement.
GUEST HOUSE/HOTEL PERMITS - All permits will be issued virtually		
No comments received.		
GUEST HOUSE/HOTEL PERMITS - Permits to apply for 24 hours from the point of activation		
No comments received.		
GUEST HOUSE/HOTEL PERMITS - Refunds will be issued for part used batches of virtual guest house/hotel permits		
No comments received.		
GUEST HOUSE/HOTEL PERMITS – Other Issues		
Do Air B'n'Bs receive more visitor permits.	1	No.

Comment	No. of People	County Council Response
Issuing of guest house/hotel permits in Kingswear will totally negate the resident permit scheme.	1	<p>The Traffic Regulation Order makes no provision for guest house permits to be available in Kingswear.</p> <p>There are no current plans to change the permit types available to Kingswear residents.</p>
DOCUMENTATION REQUIREMENTS - Documentation will be required to be uploaded for all applications		
Will this stop untaxed/No MOT /Sorn vehicles from having permits.	1	The re-introduction of document checks will make it easier to prevent the purchase of permits for SORN, uninsured and no MOT cars or vans.
Opposed to importing documents as we should use Council Tax data.	2	<p>Devon County Council does not have access to the individual district council tax databases to establish who resides at the property.</p> <p>Plus the data could not be used for residents that have just moved into a property.</p>
Data Privacy.	1	The software supplier to be used for this project is PCI level 1 accredited for its system security. Data gathered will remain covered by the services existing data privacy notice.
How do we provide proof for a vehicle that is leased/Motability/ company car.	1	There will be a signed document showing the details of the vehicle being used and for which a permit is required. Photocopies or photos of the relevant information can be attached to the online application form at time of applying. If it is a company vehicle a supporting letter on business paper from a manager may suffice.
Proof of residency difficult for families split across two properties but live at both property for various times of the week.	1	The current terms and conditions state a permit may only be issued for the address to which it is DVLA registered. If only one of the properties is in a zone, then it should be registered as being kept at that address. It is not possible now nor will it be with the new set up for any vehicle to hold more than one permit type for that vehicle at a time.
Provision of proof should prevent people who have no permit allowing non-resident permits to park.	1	Agreed.
Support the requirement to provide proof.	5	Thank you.

Comment	No. of People	County Council Response
OTHER CHANGES - Car Club vehicles permitted to park in residents parking		
Car Club should not be exempt from restrictions.	5	The exemption has been provided as the household may not know the registration number of a car they will be hiring short term or by the hour. It is also a 'nudge' to relying less on private car ownership and an overall strategy to reduce carbon emissions to tackle climate change.
OTHER CHANGES - Minor article changes		
No comments received.		
OTHER COMMENTS		
One disabled bay to be provided in each street.	1	Disabled bays are provided where there is an evidenced need. Unused parking spaces that are dedicated to specific user can cause misuse by other road users. Blue badge holders can park in Limited Waiting, Pay & Display and resident parking bays for free and are not limited to the time restrictions.
Other-non direct consultation related/other questions.	8	Noted.
Delay in receiving details of consultation/how the consultation works.	10	The Council published the consultation advert in the usual way and chose to direct market this proposal to existing customers as far as it was possible with email addresses held. Constraints on our IT meant that emails were not delivered as expected and had to be resent. The council extended the consultation period to one full month to ensure that as many people as wanted to, had ample time to comment.
Using technology puts me off as I'm not computer savvy.	5	Our CSC team and the MiPermit team will happily process applications on behalf of a customer where there is no other option for that resident to manage their own account or buy permits.
How are people without access to computers/phone apps able to manage? Is this discriminatory to those with learning difficulties?	35	All residential permits have only been available online since 2011. We are changing the software we use to manage the process and not issuing a paper permit. We issue over 30,000 permits annually and less than 1% of those are applied for by other means. Our CSC team and the MiPermit team will happily process applications on behalf of a customer where there is no other option for that resident to manage their own account or buy permits.

Comment	No. of People	County Council Response
Strongly opposed to change to virtual.	41	The reasons why the person is opposed to a change to virtual permitting were not stated. It is assumed they would fall into being against the proposals; due to concerns about misuse or abuse of parking space, or not being able to visually check a vehicle for a displayed permit, or not being confident with online forms or using an app.
Changes will make parking worse.	5	With well over 100 local authorities and major cities already using digital permits and no evidence to suggest that going digital has made parking worse or abuse of permits worse, these concerns are most likely unfounded.
Enforcement times of S1 zone.	1	Enforcement of any restriction including Residents' Parking scheme is regularly undertaken as resources allow.
Lack of EV usable charging points in residential areas and concerns about be able to park outside a house to charge vehicle.	16	The concerns are valid in so far as the Council would like to see more EV vehicles in use in the coming years, however this proposal was about changing to digital permits and a structure of charges based on CO2 emissions.
Charge for other forms of highway use such as skips and rubble.	1	The Council does already set charges for placing a skip on the Road. £65 - £119. The lower price applies if 10 working days' notice is given.
Reduce the cost for application to install a dropped kerb so we can use our driveway rather than parking on the road.	1	£281 is the current licence cost. The actual physical works may vary by contractor and cost of materials. The fees and charges are set on an annual basis as agreed by the Council's Cabinet.
Remove R Resident Scheme in Exeter as not required as properties have off road parking.	1	The R permit scheme was implemented following requests from residents. A public consultation was undertaken to understand the views and needs of the public and these were fully considered prior to the implementation of the scheme.

Comment	No. of People	County Council Response
Amending Limited Waiting Bays in resident areas so resident permit holders have exemption/or remove LWBs.	7	<p>This cannot be considered as part of this proposal and residents may wish to contact their local County Councillor so requests can be considered as part of the Annual Local Waiting Restriction Programme.</p> <p>However, we generally avoid adding an exemption to the limited waiting in areas with high numbers of permits as experience has shown the bay would be used by permit holders and unavailable for visitors as intended.</p>
Remove pay and display bays in favour of resident permit holders.	1	<p>This would require a change to the Traffic Regulation Order for each road where this would be applied. It is not part of the current proposal and whilst such a change would alleviate some parking pressures in some areas would mean that residents would have to use more visitor permits. Using digital visitor permits for the 1 to 2 hours that the Pay & Display spaces typically apply may achieve a good balance use of these spaces, unless the bays are adjacent to local shops where turnover of spaces are critical.</p>
Remove pay and display bays near off street car parks and make them resident bays.	1	<p>This would require a change to the Traffic Regulation Order for each road where this would be applied. May not be appropriate where the bays are adjacent to local shops where turnover of spaces are critical.</p>
Disabled bays, The Council should do more checks with the original applicant or address to ensure they are still needed.	1	<p>Checks are undertaken if concerns about eligibility for a specific disabled bay are raised.</p>
Lane End Road Instow, more than 1 permit please.	1	<p>This is a new scheme implemented in Spring 2022 and this request falls outside of the scope of this consultation. However, the number of permits was part of the consultation and, due to the limited number of residents spaces available, it would not be appropriate to increase the allocation of permits.</p>

Comment	No. of People	County Council Response
Residents should be able to park on Single Yellows on bank holidays.	2	The law for single yellow lines applies on the days and times on the signposts. Should that day also be a bank holiday the Council has no authority to choose not to apply the law if they find vehicles parking in contravention. Bank Holidays in Devon tend to be busier and the benefit to the safe passage of vehicles is most likely why the restriction applies.
Part time resident schemes discriminate against residents as they prevent commuter parking only. They don't help resident parking issues that occur outside the times of operation. All schemes should be full time.	10	<p>This is outside of the scope of this proposal. Schemes have been implemented after public consultations in those areas for the days and hours as agreed by the area HATOC.</p> <p>If residents don't feel the restrictions are meeting their needs and should be reviewed, they can raise those concerns with their local County Member for consideration.</p> <p>However, as the majority of parking overnight will be residents eligible for permits, it is unlikely that changing the times of operation will impact parking.</p>
Review of times on existing schemes.	4	<p>This is outside of the scope of this proposal. Schemes have been implemented after public consultations in those areas for the days and hours as agreed by the area HATOC.</p> <p>If residents don't feel the restrictions are meeting their needs and should be reviewed, they can raise those concerns with their local County Member for consideration.</p>
The more resident schemes that are introduced, the more displacement in other areas occurs. Issues are just moved further out.	1	Displacement of vehicles is considered when schemes are designed. However, it is not always possible to predict what drivers will choose to do when new restrictions are introduced.
Removal of limited waiting bays causes more parking issues.	2	The Council will only remove parking spaces where there are good reasons for doing so and only after publicly consulting on changes in the road or area.

Comment	No. of People	County Council Response
Other Green Schemes have not improved air quality or reduced pollution.	4	The proposed changes are designed to ‘nudge’ changes of behaviours and reductions in reliance on private car ownership. Climate change is a long process. During lockdown in 2020 there was global reduction in CO2 levels as cars and planes remained unused.
Should reduce availability of visitor permits to HMOs.	2	Most HMOs are either excluded from the scheme or at most receive no more than 2 books of Visitor Permits per year. Large houses divided into flats that are registered separately for Council tax before a scheme is introduced, will be entitled to have the standard 2 books of permits available per address.
Other improvements to the road network should be made before imposing additional charges.	9	The Council undertakes multiple projects and schemes simultaneously that maintain and improve the highway network for all users.
Should review the type of vehicles eligible to apply resident permits to stop permits issued to larger vehicles (Luton vans/Sprinter type vehicles).	4	We don’t currently have a system that identifies a vehicle make and model, or class. Bringing back supporting documents one of which relates to the vehicle may help identify the larger vehicles we’d prefer not to use parking spaces for, and those that would not be eligible.

Appendix D to CET/22/46 – Proposed Permit Prices as advertised

part 1

permit type	vehicle type** (see article 63 for eligible vehicle types)	charge 1st permit	charge 2nd permit	charge for additional permits (where applicable)
residents permit for all zones except Tiverton Parkway and Exmouth (B Bath Road)	Motorcycle, Scooters	£35 annually	£45 annually	£65 annually
	Other Vehicles Band A (less than 100g/km)	£35* annually	£45 annually	£65 annually
	Other vehicles Bands B – K (101-225g/km)	£35* annually	£55 annually	£65 annually
	Other vehicles Bands L - M (226+ g/km)	£35* annually	£65 annually	£65 annually
residents permit for zones Tiverton Parkway and Exmouth (B Bath Road)	All vehicle types	£0	£0	£0
business permit	All vehicle types	£35* ♦ annually	£75* ♦ annually	£150* ♦ annually
charity business permit	All vehicle types	£35* annually	£35* annually	£35* annually
supported living business permit				
school business permit				

part 2

permit type	charge
visitor permits for permit schemes operating at all times (24hr/7days) (Va – see Appendix A)	Virtual Visitor Permits £30 per issue of 350 hours (allocated in 1 hour sessions) OR Physical Daily Visitor Permits £30 per issue of 30 (24 hour) permits
visitor permits for permit schemes not operating at all times (Vb – see Appendix A)	Virtual Visitor Permits £30* per issue of 200 hours (allocated in 1 hour sessions) OR Physical Daily Visitor Permits £30* per issue of 30 (24 hour) permits
visitor permits for Tunnels Tennis Club	£30 annually
essential visitors permit	£35 annually*
guest house / hotel permits	£30 per issue of 20 (24 hour) permits
care worker permit	£0 annually
doctors / veterinary permit	no charge [#]
annual trade permit	£45 annually
short stay trade permits	£60 per book of 20 permits
daily trade permit	£5 (valid for 1 calendar day)
weekly trade permit	£25 (valid for 7 calendar days)
parking waiver (application charge)	£10 (valid for 1 calendar day) £30 (valid for 7 calendar days)
RNLI vehicles	no charge
Local Service Vehicles and School Transport Vehicles	no charge
Community First Responder Permit	no charge

Notes:

* Sandy Park Zone, Exeter (Zone S1) residential permits and business occupier permits are £12 each annually and permit holders are entitled to claim the charge from Exeter Rugby Club, essential visitor permits are £0 annually

♦ Exmouth (A Langerwehe Way) business occupier permits are £35 each annually

Each applicant is required to pay £500 per allocated parking space then £100 annually thereafter

** where a permit is for use in multiple vehicles or band is not available, then the highest band will be applied

Details of refunds for permits can be found in articles 62A to 62C”

Appendix E to CET/22/46 – Benchmarking of Permit Charges

Torbay

<https://www.torbay.gov.uk/roads/parking/residents-parking/>

Resident Permit (max 2 per household) - £30 each.

100 Visitor permits allowed. Sold in Books of 10 at £10 each.

Admin charge for permit changes - £20

Plymouth

<https://www.plymouth.gov.uk/parkingandtravel/parkingpermits>

Resident Permit (max 2 per household) - £30 each.

Visitor permit allocations vary by zone.

£2 per day – 14 max allowed per 14 days.

Yearly Visitor permit £15 each 2 allowed.

Books of scratch cards 30 in each. 1st £20, 2nd £25, 3rd £45 all run per calendar year.

Business permits for on street Resident permit bays or Pay and display spaces.

2 hours limited waiting. For 1 week - £40 or 1 year - £150.

Unrestricted. For 1 week - £75 or 1 year - £300.

Cornwall

<https://www.cornwall.gov.uk/transport-parking-and-streets/parking/car-park-tickets-and-permits/resident-parking-permit/>

Resident Permit (max 2 per household) – 1st Permit £50, 2nd Permit £75

Business Permits (max 2 per business) – 1st Permit £100, 2nd Permit £150

Visitor permits sold in books of 10 - £10 (Max 10 booklets)

Admin charge to change permit £10 limited to 2 changes per year.

Replace lost or damaged permit 50% of cost for 1st event 100% of cost for 2nd event

Somerset

<https://www.somerset.gov.uk/roads-and-transport/parking-permits/>

First Virtual Resident Parking Permit £60.

Second Virtual Resident Parking Permit £100.

The permit cost is discounted for low emission vehicles as follows:

- Vehicles with emissions up to 100g CO2/km – 100% discount.
- Vehicles with emissions between 101g -110g CO2/km – 50% discount.
- A discount is available only on the first permit application.

Annual Visitor Parking Permit £60 Visitor scratch cards are £3 for 10 (you can buy up to 100 scratch cards per calendar year).

Bristol

<https://www.bristol.gov.uk/parking/residents-parking-permits-cost>

Digitally issued and emission based charging structure applied to 1st Permit (as per below) 2nd permit £112 and 3rd permit £224.

Band A Free less than 100g/km.

Band B £28 - 101-110g/km.

Bands C - K £56 - 111-225g/km.

Bands L - M £84 – 226+ g/km.

Pre 2001 or no band £56

Visitor permits are valid per day. 50 are free then a £1 charge for each permit