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Date: 14 March 2023



East Sussex County Council  
Civil Parking Enforcement

Malcolm Johnston MBA MSc  
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Chief Executive

Town Hall  
Bexhill-on-Sea  
East Sussex TN39 3JX

Dear Sir/Madam

## **RESPONSE TO PROPOSED CHANGES INCLUDED IN CIVIL PARKING ENFORCEMENT REVIEW JULY/AUGUST 2022**

I write to you as the Head of Service Neighbourhood Services for Rother District Council (RDC) and as lead officer for RDC Off-Street Car Parks Task & Finish Group (OSCP T&FG). The OSCP T&FG was established in October 2020 to review the impact of the introduction of Civil Parking Enforcement (CPE) on Council owned car parks across the district, and to inform the East Sussex County Council (ESCC) CPE annual review on general issues that have been raised directly to the group by stakeholders regarding on-street parking.

Since its inception, the OSCP T&FG has met on more than ten occasions throughout the last twenty-four months to consider car park data, including levels of revenue, visitor numbers, and most popular hours of use. In addition, two 'calls for evidence' have been completed, inviting parish and town councils, local businesses, community groups and sports clubs to comment on if and how off-street car parking used by their community, stakeholders and staff may have been impacted by the introduction of on-street CPE.

In my previous letter to you, dated 1 March 2022, RDC set out the following observations on a formal basis for your consideration during the first annual review conducted in October 2021 as follows:

1. Overall, CPE has been well received in the town centres and feedback from the Police is positive.
2. It was noted that reduced levels of town centre congestion and parking issues are evident anecdotally, with improved availability of short-term parking on central urban streets due to restricted waiting times.
3. On-street tariffs are felt to be fair and reasonable.
4. Consideration be given to increasing the number of enforcement officers on peak visitor days, particularly in Camber.
5. Hours of enforcement be flexible to cover special events later into the evenings.
6. Seasonal enforcement be considered for Herbrand Walk Bexhill, Camber and Military Road Rye.
7. Streets with time-limited bays were inefficient and costly to enforce, as officers must note time of parking and return to monitor. Therefore, consideration be

given to extending the number of resident permit bays and decreasing number of time limited bays.

8. Consideration be given to resolving inappropriate and displacement parking both within and outside the restricted zones in particular Brockley Road; Wickham Avenue, Millfield Rise, Belle Hill, Amherst Road, Cantelupe Road, Woodville Road, and Lionel Road, Bexhill; Military Road, Rye.
9. Make 'time limited' free parking bays all two hours across the district.
10. Consideration be given to roads surrounding Egerton Park, Bexhill being given restricted parking, and a coach drop-off point and disabled parking near to the drop kerb area outside Bexhill museum.
11. Ticehurst Village and Hurst Green be considered for future extension to the CPE scheme.
12. Enforcement of inappropriate parking on 'yellow lines' be increased in villages, in particular Etchingham and Burwash where commuter parking at railway stations causes frequent congestion.
13. Extend double yellow lines from Camber Sands village along Camber Road on both sides to the A259.

RDC has discussed and collated feedback from their individual submissions to the informal consultation held by ESCC in July/August 2022, and also direct feedback from residents regarding in particular the items raised above and RDC wish to add their response as follows, taking each of the above points in number sequence:

1. The OSCP T&FG feel that most changes suggested in ESCC informal consultation are warmly received, with the possible one exception of extending the restrictions in Bexhill town streets from 6pm to 8pm.
2. Levels of congestion remain reduced from pre-CPE levels and should be further supported by the proposed changes.
3. Parking tariffs remain at the same level and are felt to be fair and reasonable.
4. Enforcement officers can be redirected to areas of concern by direct contact with ESCC enforcement team.
5. As in point 4 above, ESCC enforcement officers can be directed to cover special events.
6. As in point 4 above, ESCC enforcement officers can be directed to cover peak season issues.
7. Residents permit only parking bays have been extended in many areas, and time limited bays have been reduced proportionately.
8. Previous displacement parking now addressed by the extending of parking restrictions to many areas mentioned.
9. Time limited free parking mostly 2 hours except for Buckhurst Road (between Amherst Road and New Park Avenue) which is 4 hours.
10. Coach drop off point now included, as with disabled parking and other restrictions.
11. This request has been noted by ESCC for future consideration.
12. The request for more enforcement against parking on double yellow lines has been noted by ESCC.
13. Double yellow lines have been extended at Camber along A259.

RDC acknowledges that many of the items raised in the letter have been addressed and included in the proposed changes.

However, RDC wishes to raise concerns on certain aspects. These concerns have been referred individually by members of the OSCPT&FG to ESCC as part of the July/August 2022 consultation process and includes items i. to vi. below.

Note: Clarification has been provided by ESCC on some changes and this is included in italics where relevant.

- i. **Extending parking restrictions from 6pm to 8pm** -in order to be consistent across the district RDC changed the chargeable hours in its Off-street car parks from 8pm to 7pm in October 2020 to match the on-street parking restrictions. Members are concerned that restricting parking to 8pm may deter people from coming into the town in the evenings. -ESCC state that feedback from residents suggests they are struggling to park when they return home from work. It is proposed to change the new and existing areas of zones C, W, N and the extension to zone E to 8pm. The section of zone E above Magdalen Road remains unchanged.
- ii. **Belle Hill** may experience displacement parking as not included in the parking restrictions.
- iii. **Zone E becoming Zone C** - concerns raised regarding overspill from existing Zone C residents. It is felt by ESCC that the changes to Zone C boundary, including extending the hours from 6pm to 8pm and changing some bays to 'permit holders only', will increase available spaces for residents.
- iv. **Request for more double yellow** lines in various locations including Old Town. Congestion has increased noticeably as drivers look for free parking on-road.
- v. **Request to increase restrictions** in Beeching Road.
- vi. **Permits restricted to only two cars** in each House in Multiple Occupation resulting in some residents unable to obtain a permit. *ESCC use the council tax register for permit eligibility, with a maximum of two permits per property. In an HMO, for each 'room' to be eligible for a permit each person would need to be registered on the council tax register.*

Most changes proposed by ESCC have been well received by RDC and anecdotally by many residents. However, we trust that the above comments will be noted and considered for future action, along with the feedback gained from the informal consultation.

RDC understands that ESCC received some 1300 responses to the informal consultation and that these will inform the final proposals for the formal consultation, and any unresolved objections will then go to planning committee.

We understand that the final changes to the CPE scheme will be implemented following the formal consultation process in February/March 2023, and we look forward to seeing the results during the summer.

Yours faithfully



Deborah Kenneally  
Head of Services Neighbourhood Services