

## Consultation on Weekend and Overnight Parking in Residential Areas

Closing Date: 4<sup>th</sup> September 2023

### Douglas City Council Response

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The Council understands the need for some form of process for the control of parking such vehicles in appropriate areas, however, the proposed legislation is too overarching / unworkable and unwieldy, especially under the current framework of Local Authorities and central governance.

The Council would therefore value a fresh approach and discussion, to reach an appropriate way forward to achieve a meaningful solution to when these issues arise. However, I have to advise at this stage that the Council will not consider undertaking enforcements in relation to any proposed restrictions on publicly adopted highways.

It is clear from discussions with other Local Authorities that no Authority has requested these regulations, and all those who responded to us do not want such regulations introduced.

There has been no prior discussion / consultation about the proposed regulations as far as the Council is concerned, although, following the initial request, there has been correspondence between the Leader of the Council and the Chief Minister; correspondence from the Chief Executive Officer, Douglas City Council, and the Chief Executive Officer (DOI) and MHK Thomas; and correspondence between myself and Director of Highway Services, Department of Infrastructure, seeking to obtain a clearer picture of what shape the proposed regulations might take.

Without any draft regulations on the table, it is difficult for the Council to comment properly and to know exactly what is being proposed.

Included as an attachment to this letter, are all the comments made by residents in Douglas who have expressed strongly-held views; and the Council proposes that the DOI and Government should reconsider their approach to the proposed regulations, as the Council believes that a full public consultation is required.

### ***Finance***

The proposals could potentially have a very detrimental impact to the economic activity of the area, if trade businesses and their owners and tradespeople are forced to relocate outside the City's boundaries in order that their works vehicles can be legally parked. This could even force some of the smaller trade businesses to cease trading altogether, and could ultimately impact demand for housing and commercial premises in Douglas, further vacant and poorly maintained properties and even property prices in the capital. Consideration needs to be given by the Department of Infrastructure to conduct a socio-economic impact assessment for the proposals. The Isle of Man Treasury use:-

[The Green Book \(2022\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

### ***Housing and Property Department***

There is no depth to the proposal at the moment. A full detailed proposal and consultation is required before any meaningful response on the issues can be made. It should be noted that the original letter relates to previous discussions of which detail has yet to be provided.

It is important that the public are consulted as to their feelings on the matter. Unstructured public opinion to date has obviously been very against the proposal and for valid and strong reason. However, there will be genuine issues that need to be understood, and in some cases managed.

The Council should not, and nor should Government, interfere with people's lives in a way that inhibits their freedoms, and this for many will be the case. There will be many small business owners impacted, leisure users, and those who require vehicles of this size to improve quality of life.

Those who do have larger houses, driveways, garages, etc., will not have as much of an issue. It will be those who don't that will suffer the most. There is a large part of Douglas that falls into this latter category.

In direct relation to our Local Authority Housing Estates, we do have 'serious' parking issues. Restricting vehicles of those who do not live in the estates, or by companies who send large vehicles home with their employees, would benefit some areas.

We have had some issues in recent times in specific areas, including cul-de-sacs in Pulrose, parts of Willaston, and the areas around Spring Valley. There is no doubt that levels of restrictions within specific areas will have a positive impact on 'other' residents being able to park more conveniently.

The Housing Team has recently communicated to the residents of Pulrose about a smaller under-utilised car park within Pulrose, where the Council will permit the parking of larger vehicles (including camper vans), however, this has not been taken up by many residents, even though the car park is only a few minutes' walk away from their homes. The Council is willing to put forward a number of areas to help provide an alternative location for the residents and their larger vehicles, however, there will need to be a reason for residents to do this.

To reiterate, the current proposal is more than what would be required to solve these smaller issues.

The Council does not believe that people who live in social housing should have different rules for vehicle ownership to those who do not, just because they are social housing tenants. The Council would not support a proposal that restricted social housing tenants in any way that is different to the rest of society. However, the Housing Team would agree on some level of control to assist with issues, specifically for the impact larger vehicles can have in specific areas.

### ***Environment and Regeneration Department***

There are concerns that the proposal will have unintended consequences that will create a far greater problem than the one this legislation is seeking to address. It will apply to all speed restricted roads, not just residential streets, so it will therefore apply to whole villages, towns, and Douglas City.

The real issue that the parking of larger vehicles is having on communities needs to be clearly identified and a means found to address it. A better approach may be for the Department of Infrastructure to derive a process, if they do not already have one, by which genuine problem

areas can be assessed and restrictions applied to that area, if those restrictions will mitigate or alleviate the problem identified, rather than a blanket ban across the whole Island with exceptions. Any proposals proposed to deal with a specific issue in a specific area should then be consulted upon locally, with restrictions imposed based on the results of the consultation. Such an approach has also been suggested by a member of the public who stated that any restrictions should:

- it should only apply if a VERY large vehicle is parked in a particular location for more than a set period of days and has not been moved if requested by an official, and even then, only if the Local Authority has provided an alternative safe area for that vehicle to be able to park;
- it should not include visitors in even VERY large motorhomes who are visiting the Island for an event or holiday, and who tend to stay on campsites or who move around every few days during their stay, nor should it include locals whilst camping in them (as opposed to parking them up and forgetting about them).

The Council would like to make the point that the request really should be going through the consultation hub for wider public consultation, as the current proposal is likely to adversely impact:

- Tradespeople – employees and the self-employed who take work vans home as their primary and only vehicle;
- Families with larger vehicles meeting a specific need;
- Visitors, tourism, and the TT; and
- The local recreation market, which does pump prime money into local economies.

Should the proposals proceed in whatever format (as currently proposed or a new proposal), the dimensions of vehicles need greater consideration to only capture the size of vehicle that is causing a particular issue in a particular area. For example, a long wheel base transit van, the mainstay of many tradespeople, is 5.9m long which would be captured by the current proposal.

### ***Nobles' Park***

The Council is installing a motorhome area with a maximum stay of 4 nights. That maximum stay was a condition imposed by the Planning Department. The Council believes it is highly unlikely it will receive planning permission for long-term storage of motorhomes or other large vehicles in Noble's Park, as Noble's Park is a recreational area. Experiences in the past have shown that even temporary storage of larger vehicles in the Park leads to issues for events in the Park, motorsport and otherwise, and the Council and its ratepayers have suffered the cost of the removal of vehicles ( especially larger vehicles) when owners cannot be traced.