

MAYOR & CABINET			
Report Title	Parking Policy Review – Conclusions and Recommendations		
Key Decision	Yes		
Ward	All		
Contributors	Executive Director for Customer Services and Head of Public Services		
Class	Part 1	Date	10 April 2013

1. Summary

- 1.1. The Council's first controlled parking zone was introduced in 1983 and since then the parking policy has evolved over time. New controlled parking zones have been introduced where residents voted in favour of them but it has been some time since the Council's parking policy has been reviewed.
- 1.2. In response to comments from the Sustainable Development Select Committee and a report from the Lee Green Assembly the Mayor agreed to a review of the Council's parking policy. However, parking is an extremely complex issue and the review of the policy must balance the needs of those living, working and trading in the borough. Complicating matters further is the increase in car ownership and the insatiable demand for parking spaces along with the need to reduce the harmful effects of car use on the environment .
- 1.3. The Council consulted all stakeholders, received submissions from various groups and held events to gain a better understanding of the issues and explore potential solutions. The consultation response was excellent and gave the Council a good understanding of the parking problems but it did find that views were mixed on some points. The consultation found that there were issues with existing controlled parking zones, the identification of new zones, pricing, concessions and the transparency of the parking policy and finances.
- 1.4. The review recommendations respond to these issues with more flexible controlled parking zone arrangements, changes to the pricing structure, the introduction of concessions for various groups and a commitment to greater transparency on parking-related financial issues.

2. Purpose

- 2.1. The purpose of this report is to present the recommendations of the Parking Policy Review to Mayor and Cabinet.

3. Recommendations

It is recommended that the Mayor:

- 3.1. Note the key issues and conclusions arising from the review;

- 3.2. Agree the recommendations listed in detail at **Appendix J**. The key recommendations are listed below:

Summary list of recommendations

How to define the CPZ implementation area (See Section 6.1)

- A Maintain a minimum turnout of 10% of households within the implementation area, and introduce CPZs where over 50% of residents (that vote) are in favour of the zone.

How to manage the effects of over-spill (See Section 6.6)

- B Consult residents across the area affected by both existing and potentially displaced parking pressures and be more responsive to the affects of over-spill.

How to determine the operating hours of each CPZ (See Section 6.11)

- C Maximise flexibility where feasible by offering a menu of options for the operating hours of CPZs.

How to improve the systems for collating customer feedback (See Section 6.16)

- D Develop a standardised approach for the submission and collation of CPZ parking issues to the Council.

How to manage future parking demand (See Section 6.20)

- E Where significant parking problems are predicted as a result of developments, a presentation of evidence and specific solutions will be considered on a case by case basis, to be approved by Mayor and Cabinet. Solutions may include residents being given a chance to influence the design of the CPZ, but not vote as to whether one will be implemented.

Reviewing the annual permit charges (See Section 7.1)

- F The new parking permit charges will be frozen at the new levels until the 2015/16 financial year and reviewed annually thereafter to take account of financial pressures.

Considering the charging model and proposed charges (See Section 7.5)

- G Introduce a concessionary rate (£30) to permit holders with the most efficient vehicles (e.g. Tax Bands A-B).
- H (a) Either, maintain the current flat-rate charging model at £120; or
- H (b) Introduce a lower rate of £110 for the first resident parking permit by charging a higher rate of £150 for additional vehicles.

Additional support for those who rely on visitors (See Section 7.10)

- I Reduce the cost of weekly visitor parking permits from £28 to £20 per week.
- J Introduce free visitors permits for those who purchase a resident parking permit and those living in a CPZ who are elderly on a low income (limited to 10 – see paragraph 7.12.5).

Additional support for those who require constant help and care (See Section 7.15)

- K Provide carer parking permits free of charge.

Supporting businesses and the local economy (See Section 7.20)

- L Maintain the current charges for business parking permits, car parking and Pay and Display facilities.

Improve the provision for Blue Badge Holders (See Section 7.25)

- M Establish an application process for disabled bays, with set criteria to ensure that these bays are necessary, safe and feasible.
- N Maintain the national scheme of a 20-minute period for loading or unloading items or other goods from the vehicle and maintain a 5-minute minimum observation period to ascertain whether this activity is being carried out before considering enforcement actions.

Clear and accessible policy documentation (See Section 8.1)

- O Refresh all parking policies and collate into an integrated and accessible parking policy document and authorise the Executive Director of Customer Services and the Executive Director of Resources and Regeneration to approve the final policy document in line with the recommendations in this report.

An annually reviewed CPZ programme (See Section 8.6)

- P Establish a prioritised programme for the consultation, implementation and review of CPZs.

An annual report on parking related finances (See Section 8.11)

- Q Produce an enhanced and accessible annual report on parking related revenue.

Other policy areas (See Section 9)

- R Pay and Display machines to be phased out over-time in favour of more cost-effective and cashless parking alongside alternatives for people who do not have access to a mobile phone or a credit/debit card.
- S All signs within existing CPZs will be reviewed as part of the review programme to ensure they are consistent and clear.

4. Background and policy context

- 4.1. The Mayor of London's London Plan, details the overall strategy for London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The implementation of this plan is achieved through the local work undertaken in each of the London boroughs. Therefore any changes to Lewisham's Parking Policy following this review will need to align with the traffic management and parking commitments in the London Plan.
- 4.2. Like most London Local Authorities, Lewisham levies a charge for a permit to park in areas within the borough that have been designated as Controlled Parking Zones (CPZs). CPZs are a function of transport policy and are used to:
- ensure safe and sustainable access;
 - achieve effective parking management;
 - balance the needs of all road users;
 - meet environmental objectives;

- focus on customer needs.

- 4.3. The first CPZs in the borough were introduced in 1983 in central Lewisham and Blackheath. In 2005 a borough-wide consultation was undertaken to identify where parking problems existed and where the consultation identified a parking problem more detailed consultation was undertaken in that defined area.
- 4.4. Since 2005 additional CPZs have been introduced to meet the transport policy aims, as set out above. In a policy that is local to Lewisham, these CPZs have only been introduced where 55% or more of residents (that vote) in the affected area agree that a CPZ is required (or between 50 and 55% with Mayor and Cabinet approval).
- 4.5. This policy has ensured that residents are fully engaged in decision-making, but has also led to some anomalies in CPZ coverage. For instance, where some streets in a proposed CPZ have voted yes, and some no, then the CPZ has been introduced in a partial manner in only those streets with a majority in favour. This increases the probability that the parking demand the CPZ was introduced to manage is not reduced, but simply displaced onto other streets.
- 4.6. CPZs operate for specified times. Lewisham's CPZs operate all day, from at 9am to at least 5pm, Monday to Friday. Where parking demand remains high at the weekends, some CPZs also operate on a Saturday.
- 4.7. Like most authorities, Lewisham offers a variety of permits to park in a CPZ. These include permits for residents, their visitors, for businesses, and for carers. Lewisham operates a relatively simple charging structure for these permits when compared to other authorities. For instance, there is a single price (currently £120) for a resident parking permit. Many other London authorities vary prices by the emission status of the vehicle, by geographic location (with prices higher in more central parts of the borough) and by the number of permits issued per household.
- 4.8. Parking permit charges were considered as part of a Council-wide review of fee income in late 2010. This review found that in many instances prices in Lewisham were below the median level across London, and recommended a series of price increases designed to raise prices to the projected London median, based on the assumption that other authorities would also be increasing their prices. Mayor and Cabinet agreed these recommendations in February 2011 as part of the budget setting process for the 2011/12 financial year, and the new prices were introduced on 3 May 2011.
- 4.9. Since the price increases were implemented in 2011 the Council has received and considered a large range of feedback from residents, community groups and local assemblies. This has incorporated Select Committee focus on the issue and, on 15 September 2011, this committee made a number of recommendations to the Mayor: to provide financial information; to review the cost of visitor permits; to consider differential charging; and to allow permits to be paid for in monthly instalments.
- 4.10. The Executive Director for Customer Services responded to the recommendations on the 7 December 2011. In summary this response was that it would be very difficult to deal with parking policy issues in isolation as changes would have impacts across the whole of the borough and significant financial implications.

However, the response did highlight that the new parking contract, to be let in 2013, would enable the Council to offer payment by instalment.

- 4.11. On 11 April 2012 the Lee Green Assembly presented a report and a petition on parking issues to Mayor and Cabinet, following joint work done between the assembly and officers from the Parking and Highways services. The report made 11 recommendations regarding: transparent financing; charging; flexibility and operational hours of CPZs; consultation and implementation; business permits; and school parking.
- 4.12. On 23 May 2012, a report was presented to this committee that set out the scope and timetable for a comprehensive review of the Council's parking policies.
- 4.13. On 30 May 2012, Mayor and Cabinet agreed to undertake a Parking Policy Review in response to the recommendations made by this committee and the Lee Green Assembly, and to consider the feasibility, costs and benefits associated with the adoption of alternative pricing structures.
- 4.14. The timetable for the review has incorporated an extensive programme of public consultation. On 1 November 2012, summary findings from the public survey were presented to this Committee. This paper sets out the issues and conclusions arising from the consultation, and proposes a set of recommendations to be presented to Mayor and Cabinet on 10 April 2013.

5. The consultation

- 5.1. Since August 2012, the Council has been conducting a borough-wide consultation exercise to seek the views of the public and inform the policy review. This included a public survey questionnaire, stakeholder workshops, and representations from community groups and individual members of the public. Appendix A of this report contains more detail about our consultation approach.
- 5.2. The public survey questionnaire ran for 8 weeks from 3 August to 28 September. Respondents were given the opportunity to complete the survey online, but paper copies were also made available at locations across the borough.
- 5.3. The Council received 3,113 survey responses (both paper and online) and over 20 group responses and additional comments from residents.
- 5.4. Of the respondents to the survey 57% live within an existing CPZ zone while 43% live outside these zones within the borough or commute into the borough to work. Residents in the borough accounted for 92% of respondents and 83% are motorists. 168 Council employees completed the survey and 184 business owners.
- 5.5. Of those that responded and live within a CPZ zone, 89% have a residents permit and 48% believe the CPZ does not meet their needs.
- 5.6. The main issues to be raised in the free text comments were around the cost of parking (all aspects), the last 100% increase and the timings of the existing CPZ zones e.g. all-day versus a shorter time period.

- 5.7. Detailed findings from the public survey were presented to this committee at the meeting on 1 November 2012. Appendix B of this report contains a summary of the survey findings.
- 5.8. The Council received feedback from five community organisations as part of the wider discussions on the review of parking policy.
- 5.9. Deptford Action Group for the Elderly (250 members), The Pensioner's Forum (1,400 members), Age UK Lewisham & Southwark (supporting all residents aged 50 and over), and Carers Lewisham (supporting 5,000 unpaid carers) all provided an organisational response to the parking survey on behalf of their membership or service users.
- 5.10. Community organisations were offered additional support and assistance in completing the consultation. Deptford Action Group for the Elderly chose to meet with the Head of Public Services to discuss their issues in greater detail. The Head of Public Services also met with the Jimmy Mizen Foundation prior to the development and launch of the public consultation on parking in Lewisham.
- 5.11. A wide range of feedback was received from councillors, local assemblies, and residents. These responses were submitted as reports, petitions, letters, complaints or emails to the Council, rather than as completed responses to the official consultation survey. Details of the group responses and other comments can be found in Appendix C of this report.
- 5.12. On 5 and 9 November 2012, the Council held stakeholder workshop events to engage with the public and community representatives. Invitations were targeted towards representatives of local assemblies, community groups that have submitted a collective response to the parking survey, or individuals that indicated they were representatives of local charities or community groups in their completed survey responses.
- 5.13. The workshops included a presentation and discussion of the survey findings followed by group discussions on the emerging themes of the policy review.
- 5.14. In November 2012 the Council received the results of a local survey on parking done by Ladywell Councillors and in January 2013 received results of a local parking survey held by Honor Oak Park residents Association. The results of these surveys can be found in Appendix C.
- 5.15. There were four themes that emerged from the survey and group responses received. These are:
 - Implementing a CPZ to manage demand
 - Managing overspill
 - Timings of the zones
 - Permit costs
- 5.16. Appendix D of this report contains a list of attendees and a detailed summary of the group discussions held at the stakeholder events. The following sections of this report explore the key issues arising from the consultation exercise.

5.17. An additional theme that emerged from representations from local assemblies and at both stakeholder events is:

- Transparency of policy, programmes and finances

5.18. The table below sets out the five themes that emerged, and draws out the key issues arising from each theme.

Key issues arising from the consultation

	Consultation Theme	Key Issues
New and existing CPZs	Managing Over-spill	How to define the CPZ Implementation Area
		How to manage the affects of overspill
	Timings of the zones	How to determine the operating hours for each CPZ
	Managing future demand for parking	The need to improve the systems for collating customer feedback
		How to manage future parking demand
Charging structure and permit charges	Permit costs	Reviewing the annual permit charges
		Considering the charging model and proposed charges
		Supporting business and the local economy
		Additional support for those who rely on visitors
		Additional support for those who care for vulnerable people
		Improving provision for Blue Badge Holders
Transparency of parking policies, programmes and finances	Transparency of parking policies, programmes and finances	Clear and accessible policy documentation
		An annually reviewed CPZ Programme
		An annual report on parking related finance

5.19. In addition to the key issues arising from the consultation, the review has identified the opportunity to undertake a wider refresh of all the Council's supplementary parking policies. This includes our policies on parking near schools, free short-stay bays, footway parking, cashless payment technologies, car park pricing, and parking policies in support of sustainable travel.

5.20. The following sections of the report examine the key issues of the review, and provide the narrative and rationale for the recommendations. This comprises a description of the issue, a summary of the feedback received, an assessment of the options, and the conclusions and recommendations. This analysis is grouped into the following three areas:

- Consulting on new and existing CPZs;
- Charging structure and permit charges;
- Transparency of parking policies, programmes and finances.

6. Consulting on new and existing CPZs

6.1. Issue: How to define the CPZ implementation area

- 6.1.1. Under the current policy residents are consulted on a street-by-street basis. The consultation results are considered both at street-level, and across the whole consultation area.
- 6.1.2. CPZs that are introduced purely on a street-by-street basis can create problems. For instance, CPZs that are too small can be ineffective, as people choose to park outside the zone, simply creating more pressure on neighbouring streets. Also, where streets “opt out”, gaps in or between zones can create severe problems for residents without driveways.
- 6.1.3. CPZs have been introduced where over 55% of residents agree that a CPZ is required. When the result has been between 50 and 55%, an additional process has been required to seek Mayor and Cabinet approval.
- 6.1.4. There is currently a minimum turnout of 10% required at the consultation stage.
- 6.1.5. A detailed process flow of the current process for consulting and implementing a CPZ is contained in Appendix G.

6.2. Consultation and feedback

- 6.2.1. In the survey respondents were asked a series of questions about the voting process for implementing a CPZ. When asked if there should be a minimum voting turnout for residents and businesses in the proposed CPZ area, 73% of respondents said yes. Those that said yes were then asked what this minimum voting turnout should be in percentage terms and the majority indicated 30% or above.
- 6.2.2. During the stakeholder events and at the last meeting of this committee it was noted that rarely do elections of any kind get a voter turnout of 30% and that 10% or above might be more realistic.
- 6.2.3. Out of all the CPZs implemented since 2005, just two new zones would have been implemented if the minimum turnout of 30% proposed from the survey results was used. The table below shows the return rates for all these zones.

CPZ Consultation return rates

Scheme	Year of Survey	Delivered	Returned	Return Rate	For	Against	CPZ installed?
Mountsfield Park	2005	1136	214	19%	42%	58%	No
Lee	2010	274	87	32%	58%	42%	Yes
Mountsfield Park	2010	1312	196	15%	49%	51%	No
Hither Green West ext.	2010	532	93	17%	68%	32%	Yes
Ladywell	2009/10	2267	620	27%	72%	28%	Yes
Ladywell ext.	2011	886	364	41%	59%	41%	Yes
Old Road /Bankwell Road ext.	2008	931	209	22%	62%	38%	Yes
Hither Green East ext.	2008/9	156	58	37%	72%	38%	Yes
Rushey Green South	2007	1240	178	14%	62%	38%	Yes
Hither Green East	2007	1170	432	37%	61%	39%	Yes
Dauids Road	2006	562	68	12%	63%	37%	Yes
Barmeston Road	2006	168	27	16%	58%	42%	Yes

6.2.4. Respondents were also asked if, of those that turnout to vote, there should be a minimum level of support in favour of implementing the CPZ. More than 80% of respondents agreed that there should be, and of these, 75% thought that the percentage in favour should be at least 50%.

6.3. Options

6.3.1. Three basic options for the definition of a CPZ Implementation Area have been assessed, along with a consideration of options for the level of support in favour of implementing the CPZ and voter turnout levels from the consultation process.

6.3.2. **Street-by-street:** Firstly zones could be introduced purely on a street-by-street basis. While this accurately reflects local views, it would create an incoherent patchwork of CPZs with many gaps and small CPZs creating over-spill issues for neighbouring streets, potential confusion to motorists trying to park legally, and thereby a knock-on effect for enforcement.

6.3.3. **Defined area:** Secondly, implementation areas could be defined and set on a purely technical basis. This would be based on an assessment of parking capacity and usage, and the boundaries of zones could accurately reflect the local geography, as well as ensuring that any future zones are compatible. However, it is likely that zones designed in the absence of local input would not produce the most appropriate solution, and would see areas being unnecessarily included in zones. Also such zones are likely to be larger than otherwise necessary and fixed in size, and therefore would be unlikely to achieve the support required from residents.

6.3.4. **Flexibly-defined area:** Finally, implementation areas could be set following a consultation process with residents and businesses, so that both local views and local geography can be taken into account. This would allow the implementation of zones to balance the need for local input with the need to be workable and coherent. This would ensure that new zones have the majority support of residents, but would offer the flexibility to ensure that the size and shape of zones are as effective as possible.

6.3.5. **Majority support:** The current threshold for majority support, for the implementation of a CPZ, of over 55% has been considered in response to comments and analysis from the consultation. In order to predict and minimise the affect of overspill, a lower (40%) and a higher (60%) threshold, for the implementation of a CPZ, have also been considered.

6.3.6. **Minimum turnout:** In practice, turnout for consultations on parking is generally between 10 and 20%. This compares favourably to other public consultations on local issues. A full range of options have been considered, including no minimum level, and setting a very high level.

6.4. Conclusions

6.4.1. In order to ensure CPZs are coherent, they need to reflect residents' views, but also the local geography, including neighbouring CPZs, nearby parking attractors, and main roads.

6.4.2. The policy review therefore concludes that implementation areas must not be set purely on the basis of street-by-street analysis, nor on a purely technical basis. Instead, the implementation area will be set following a consultation process with residents and businesses, so that both local views and local geography can be taken into account. A CPZ will therefore be introduced across any significant part of the consultation area provided there is a majority support of residents within the proposed zone. This means that some streets may vote against a CPZ, but may be included to ensure that the zone is workable. Where this happens, the rationale will be made available to residents. This will offer the flexibility to ensure that the size and shape of zones are as effective as possible.

6.4.3. With any referendum-based system, any deviation from a 50% threshold requires a strong justification. While there is a case for either raising or lowering the required majority, the policy review concludes that 50% is the most appropriate threshold, as views either in favour or against the implementation of a CPZ are equally valid. The review therefore proposes to remove the additional Mayor and Cabinet decision-making process for results between 50% and 55%, which will help to streamline the consultation process and improve response times to parking problems.

6.4.4. The argument about strengthening the mandate (either in favour or against a CPZ) is a valid one, and the review concludes that in order to achieve this, a minimum level of turnout should be formalised. Based on historical levels, a minimum turnout of 10% of households within the implementation area will ensure that consultations with unusually low turnout will be deemed inconclusive.

6.5. **Recommendations** (noted in A at paragraph 3.2)

- 1 Maintain a minimum turnout of 10% of households within the implementation area, below which the consultation will be deemed inconclusive.
- 2 Introduce CPZs where over 50% of residents (that vote) in the implementation area are supportive.
- 3 Remove the additional Mayor and Cabinet decision-making process for results between 50% and 55%.

6.6. **Issue: How to manage the affects of over-spill**

6.6.1. Under the current parking policy, CPZs are implemented in response to demand from residents suffering from severe parking pressure near their homes. Such acute pressure tends to originate around sites such as town centres or rail stations. Over recent years, the scale and severity of problems have been exacerbated by continued growth in car ownership and densification of residential areas.

6.6.2. Parking pressure in such areas can significantly affect the quality of life for many residents, but has a particular impact on the elderly, disabled and young families. Like all the boroughs in London, Lewisham introduced a policy of controlling parking to enable residents to access their homes safely and conveniently.

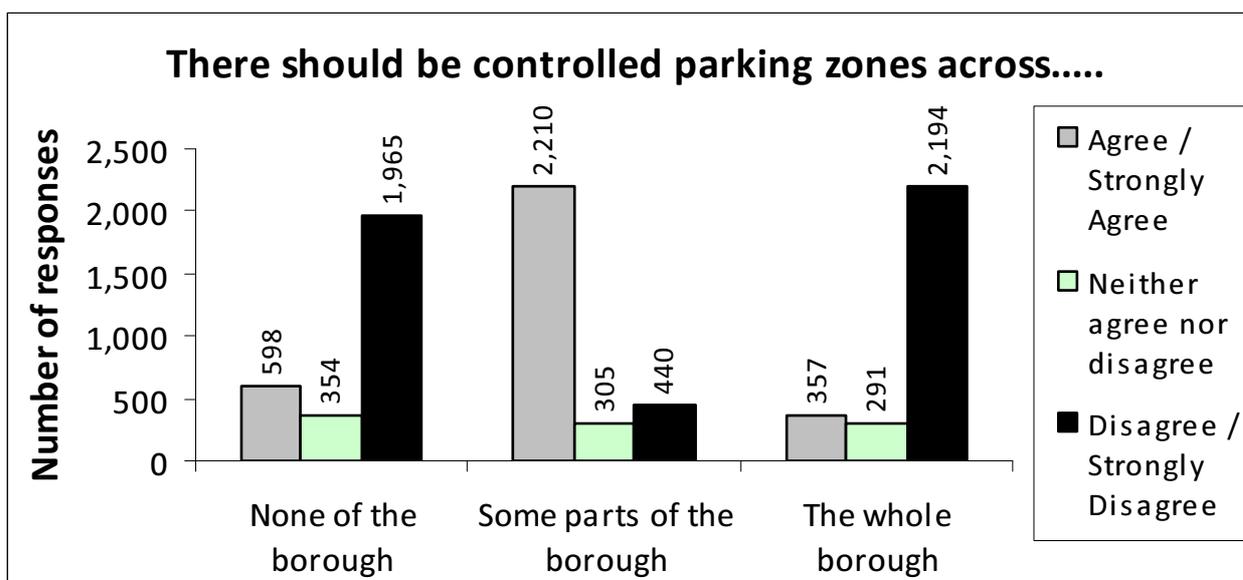
6.6.3. When CPZs are introduced, people often choose to park in the areas surrounding the new zone, so an element of the parking pressure is displaced, or “over-spills” onto nearby streets. This creates problems in neighbouring streets and can become a divisive issue within local communities.

6.7. Consultation and feedback

6.7.1. In the survey respondents were asked to identify the main locations where they thought parking controls should be implemented. The top four were train stations, shopping centres, schools and hospitals.

6.7.2. When asked if the council should tell them when there is a parking issue in their area there was an overwhelming majority of agreement that this should be the case. See Appendix B.

6.7.3. Respondents were also asked to agree or disagree with three statements about the coverage of CPZs across the borough. The graph below shows that there was acceptance that CPZs were needed in at least some parts of the borough.



6.7.4. The benchmarking in Appendix F shows that all 32 London Boroughs (The City of London has not been included) have CPZs. Just 5 boroughs have zones that cover the whole borough. These 5 all operate an emissions based charging scheme with relatively low permit charges.

6.7.5. Respondents that do not currently live in a CPZ that responded to the survey (1,317) were asked if they currently lived close to the boundary of a CPZ and 430 said that they did. Of these 430, over half (288) responded that they were affected by overspill from the neighbouring CPZ.

6.7.6. Analysis of these 288 responses showed that Ladywell and Lee Green wards were the most affected. For a detailed breakdown see Appendix B. The petition and ward assembly survey conducted in Ladywell (Appendix C) raised overspill as a significant issue in those streets near the Ladywell and Lewisham Central zones, such as Vicars Hill and Shell Road.

6.7.7. Respondents that do not currently live in a CPZ were asked if they thought parking controls were needed in their area. The consultation found that Ladywell, Lee Green and wards down the East London Line favoured parking controls in their area (Appendix B).

6.8. Options

6.8.1. The most severe affects of over-spill occur when a high proportion of parked vehicles are displaced onto a particular street. The key to avoiding severe over-spill is to use different ways to disperse vehicles.

6.8.2. **Dispersal by implementing larger zones:** Increasing the dispersal of parked vehicles can be achieved by implementing larger CPZs, which spread over-spill across a wider perimeter. However, there are difficulties in predicting the most suitable size for a CPZ, due to the many behavioural and geographical factors that affect its success. The size and shape of CPZs are dependant on the support of residents, rather than being imposed on a purely technical basis.

6.8.3. **Shaping zones through consultation:** As CPZs are shaped through consultation, a key consideration in managing over-spill is the consultation process. The current policy uses successive rounds of consultation to allow the CPZ to evolve into the most appropriate size and shape.

6.8.4. A range of options have been considered to predict and avoid the knock-on effect on neighbouring residents. Options discussed at the stakeholder events include reducing the voting threshold to 40% in the peripheral areas of a proposed CPZ. This approach assumes that once the affects of over-spill are felt, areas on the verge of voting in favour of a CPZ, would subsequently gain majority support. Other options proposed at the stakeholder events included applying a different weighting to votes according to whether residents live in the area currently affected, or in the area predicted to be affected.

6.8.5. However, such options would be difficult to administer fairly, and would rely on predictions about the scale of over-spill and, critically, on assumptions about how strongly people would feel about the parking issues when balanced against the costs associated with a CPZ.

6.8.6. **Dispersal by targeting different users:** Dispersal can also be achieved through policies that target different users in different ways, such as residents, commuters and short-stay visitors. For instance, reducing charges for residents would encourage greater take-up of permits, and reduce the proportion of residents choosing to park outside the zone.

6.8.7. Similarly, varying the operational hours of CPZs can target either commuters or short-stay visitors. For instance, a shorter operating period will displace commuters from the CPZ, but will allow many short-stay visitors to remain in the CPZ, making use of available spaces.

6.8.8. Applying a combination of these policy tools can help to make better use of the capacity in CPZs, and can assist in avoiding the situation where CPZs with empty spaces are surrounded by fully parked streets.

6.8.9. **Responding quicker to over-spill:** Options have also been considered for enhancing the responsiveness of the current CPZ process. Such options would aim to minimise the time that residents experience problems, whilst ensuring that CPZs are only implemented when and where residents deem them necessary. The current process can take up to a year from consultation to implementation of the CPZ.

6.9. Conclusions

6.9.1. Fundamentally, the policy review concludes that CPZs are the most appropriate solution to manage parking pressures in residential areas and should be introduced with the support of local residents. As an inevitable consequence of CPZs, the policy review will aim to manage over-spill as effectively as possible.

6.9.2. The new policy will aim to minimise the effects of over-spill in a number of ways. Firstly, to help ensure that CPZs cover the right area, consultation will include residents affected by both existing and potentially displaced parking pressure.

6.9.3. Secondly, in order to encourage higher take-up of permits among residents on the edge of zones, the charges associated with CPZs have been reviewed.

6.9.4. And thirdly, the review will consider shorter operational hours of CPZs; this will allow greater dispersal of parking pressure by displacing only those who wish to park all-day, generally commuter parking.

6.9.5. As well as minimising the effects of over-spill, the new policy will also aim to enhance the responsiveness of the current CPZ review process to ensure that residents affected by displaced parking are consulted and agreed solutions are implemented.

6.10. Recommendations

- 4 Ensure consultation involves residents across a given area that are considered to be affected by both existing and potentially displaced parking pressure.
- 5 Enhance the responsiveness of the CPZ review process to ensure that residents affected by displaced parking are consulted and agreed solutions are implemented.

6.11. Issue: How to determine the operating hours for each CPZ

6.11.1. Currently all CPZs operate for a minimum of 9am-5pm (i.e. "all day") and at least from Monday to Friday. Zones that operate all day offer residents a high level of protection from parking pressure, as they deter vehicles from parking for any period throughout the day.

- 6.11.2. Historically, permits for residents and visitors were available at a relatively low cost. This resulted in the introduction of CPZs that offered protection throughout the day. The subsequent price increases have highlighted a public demand for 2-hour zones which may, in some areas, address the parking problems and offer savings for residents on the number of visitor permits required.
- 6.11.3. As discussed in an earlier section of this report (6.6), which considers how to manage over-spill, varying the hours of operation can also help to reduce the knock-on effects of CPZs. Shorter operational hours can promote a greater dispersal of parking pressure, as they mainly displace only those who wish to park all-day, generally commuters.

6.12. Consultation and feedback

- 6.12.1. Respondents to the survey were asked what the most appropriate hours of operation would be for a CPZ and also which days of the week they thought a zone should operate. The majority of respondents felt that an all-day zone 9am-5pm or 7pm was the most appropriate, but over a third felt that a shorter period would be better. Monday to Friday is the most popular time period for a zone to operate, but over 500 respondents did consider that Saturday might also be necessary in certain areas.
- 6.12.2. Looking at Appendix B and where respondents live in the borough i.e. which CPZ or ward shows that there is a lot of support for a shorter time period in Hither Green East CPZ and in Lee Green ward. However, respondents from Blackheath and Lewisham Central CPZs are very much in favour of an all-day zone.

6.13. Options

- 6.13.1. **All-day zones:** All-day zones are necessary to control parking in residential areas where demand for parking is high throughout the day. This includes areas within walking distance (800m)¹ of major commuter and visitor attractors such as town centres, transport hubs and hospitals.
- 6.13.2. However, as well as deterring commuters, all-day zones also deter journeys that directly benefit the local community, including short-stay shopping trips and social visits to vulnerable people.
- 6.13.3. **Shorter operating periods:** Shorter operating periods can be used to restrict parking during, for instance, a 2-hour period from 12noon – 2pm. Such zones would deter commuter parking, and would offer greater flexibility to residents, businesses and visitors to the zone.
- 6.13.4. Various operating hours have been considered, including 1-hour zones and half-day zones, and such zones could operate at any time throughout the day. Co-ordinating and staggering the operating hours for neighbouring CPZ can help to ensure that a workable enforcement regime can be developed.

¹ 800m is the suggested maximum acceptable walking distance to a town centre for pedestrians without a mobility impairment. (Institute of Highways and Transport (IHT) Guidance Table 3.2)

- 6.13.5. However, shorter operating periods will not be sufficient to control parking in the vicinity of destinations that attract high numbers of visitor parking throughout the day, such as town centres and hospitals.
- 6.13.6. It should also be noted that shorter operating periods would not result in lower permit prices. The costs of designing, consulting, implementing and maintaining CPZs would remain the same. While some operational savings may be possible as enforcement would not be provided throughout the whole day, these savings would be largely limited due to the need for a more intensive enforcement operation during the shorter operating period.
- 6.13.7. **Multiple operating periods:** Operating hours can be split to cover, for example, a 2-hour period in the morning, and a 2-hour period in the afternoon or evening. This can be a useful way to address areas where there is a combination of commuters and visitors generated by different parking attractors.
- 6.13.8. **Free short-stay spaces:** In areas where short-stay capacity is required to support local businesses, free short-stay bays can be included within the CPZ. This as an approach to controlling parking, allows people to make short visits to local shops or amenities. Alternatively, it is possible to permit parking anywhere within a zone for a limited period. This approach is less controlled, and would not be recommended where spaces are limited and in the vicinity of major-all-day attractors. However, it can be a useful tool, for instance, to support free parking in residential areas around parks or museums.
- 6.13.9. **Yellow lines:** Yellow lines are the standard way of controlling parking, and can be a useful tool within a CPZ area, usually to ensure road safety. Single yellow lines can be employed for any period throughout the day, and can be a useful way of controlling parking when demand varies throughout the day. However, it is not generally considered as an option to replace a CPZ, as yellow lines will prevent residents from parking during the operational hours.

6.14. Conclusions

- 6.14.1. The primary purpose of a CPZ is to ensure that residents can safely and conveniently access their homes. In residential areas where demand for parking is high throughout the day, zones will also need to operate throughout the day. However, where appropriate, shorter hours can offer greater flexibility to residents, businesses and visitors to the zone.
- 6.14.2. In order to balance these opposing priorities, it is necessary to consider the range of parking attractors in each locale and to consult local residents to determine the most appropriate hours of operation for the zone.
- 6.14.3. The review concludes that areas in the borough that are within an 800m walking distance of major all-day parking attractors will require controls throughout the day. The map after Section 15, shows the main all-day attractors of Lewisham, Deptford, Catford, Blackheath, and Lewisham Hospital.

- 6.14.4. The review concludes that short-period zones are most effective in residential areas where commuter parking is the predominant source of the parking problem. In Lewisham, this is particularly evident where local rail stations provide a singular source of parking pressure in otherwise largely residential areas. The map after Section 15, shows some of these stations, and particularly highlights the East London Line, which has attracted many commuters since its successful incorporation into the London Overground network.
- 6.14.5. The new policy will therefore aim to maximise flexibility where feasible by offering residents a menu of options for the operating hours of CPZs, which will be dependent on the parking attractors in the local area.

6.15. Recommendation

- 6 Maximise flexibility where feasible by offering a menu of options for the operating hours of CPZs. The options available will depend on the parking attractors in the local area.

6.16. Issue: How to improve the systems for collating customer feedback

- 6.16.1. The Council currently maintains a reactive position to parking problems and is driven by complaints and expressions of interest before consulting residents about the need for parking controls.
- 6.16.2. For those experiencing parking problems, the first point of contact with the Council is generally via a range of formal or informal channels, including direct telephone contact with officers, emails to generic email in-boxes, and letters via Councillors.
- 6.16.3. While informal systems exist to collate feedback from the public, there is no formal mechanism in place to ensure all representations regarding parking issues are treated in a similar fashion.

6.17. Option

- 6.17.1. **Standardised approach:** A more formalised system would enable the public to highlight parking issues, submit requests for a CPZ consultation, and provide feedback on proposed or new CPZs.
- 6.17.2. A standardised approach, based on an online form or standard CPZ request form, would assist in the effective collation of requests and feedback, and inform the annual development of the CPZ Programme.

6.18. Conclusion

- 6.18.1. In order to improve the customer experience, and to ensure requests can be collated and assessed fairly and transparently, the policy review will recommend a standardised approach, such as an online form or CPZ request form, for the submission and collation of CPZ parking issues to the Council.

6.19. Recommendation

- 7 Develop a standardised approach for the submission and collation of CPZ parking issues to the Council.

6.20. Issue: How to manage future parking demand

- 6.20.1. The Council currently maintains a reactive position to parking problems and is driven by complaints and expressions of interest before consulting residents about the need for parking controls.
- 6.20.2. Demand for parking is increasing as a result of new rail links, increasing car ownership, and new developments. While these factors create increasing pressure on the limited parking space available, the current policy does not allow the Council to plan ahead to prevent the impact on residents.
- 6.20.3. To some degree, in areas surrounding some of the East London Line stations forward planning may have prevented some of the current acute issues with commuter parking that have arisen since the line's refurbishment and extension.
- 6.20.4. But in particular, major developments in the town centres will impact on local parking arrangements. A high proportion of car-free residential units, and key regeneration projects make additional demands on car parking capacity in town centres. Much has been achieved through the planning process to mitigate the parking pressures, but the current policy means that solutions cannot always take effect until after the problem materialises.
- 6.20.5. For instance, in Deptford Town Centre, improvements to the town centre, along with a number of new and forthcoming developments, will place pressure on existing parking capacity in and around Deptford High Street.
- 6.20.6. In addition, over 5,500 new residential units are proposed just to the north of Deptford Town Centre. This includes Convoys Wharf, a major strategic site with over 100,000 square metres of commercial development, and over 3,500 residential units. In order to manage the demand for parking and to reduce the impact on traffic, a significant proportion of these units will be car-free, meaning that new residents will not be able to purchase parking permits for a future CPZ. However, if a CPZ is not in place before residents move in, some new residents may choose to park in local streets, and may possibly purchase properties on that basis. Under such circumstances, retrospectively implementing a CPZ could create enormous difficulties for these residents.
- 6.20.7. It is essential that Deptford develops in a way that works for residents, businesses and visitors. As one of the boroughs key town centres, there are a wide-range of community stakeholders that will benefit from its regeneration.
- 6.20.8. As part of the place-making work that the Council is undertaking, including a £1.5 million re-design of Deptford High Street, a detailed case study of the specific parking issues facing Deptford Town centre is being conducted.

6.21. Consultation and feedback

- 6.21.1. During the stakeholder events there was a very strong view that parking issues for future developments should be taken into account early in the planning and build process to allow appropriate action to be taken before parking problems arise.
- 6.21.2. Attendees felt (as can be seen in Appendix D) that early discussions with residents groups, local assemblies and other relevant organisations across a wide area would allow an appropriate solution to be implemented ahead of issues arising.

6.22. Options

- 6.22.1. **Maintain a reactive position:** A reactive approach to parking pressure generally ensures that problems are only solved when necessary.
- 6.22.2. However, the scale of proposed development of the major strategic sites in the borough will see the delivery of thousands of new residential units that are necessary to cater for our growing population. This includes a high proportion of car-free residential developments, which do not have access to parking. It is anticipated that most people choosing to live in a car-free development will not own cars, and will make use of the public transport links that are in place. However, a small minority may not adhere to this principle, and so to some degree, such developments rely on parking controls being in place to ensure they are offered some protection from an increase in parking demand for kerb-side space.
- 6.22.3. **Consider parking during the planning of large developments:** Where CPZs are required to ensure that developments do not have a detrimental effect on parking in surrounding communities, developers are required to consider the nature of parking controls at an early stage in the planning and delivery process.
- 6.22.4. The Council would engage with residents about the shape, design and timing of the zone rather than the need for a CPZ, which would be determined during the planning and delivery process.

6.23. Conclusions

- 6.23.1. The public consultation revealed a strong preference for the Council to inform the public when a parking problem may arise. However, evidence also shows that the public are reluctant to support parking measures before a problem arises.
- 6.23.2. The policy review therefore concludes that a process is required by which parking is considered early on in the planning and delivery process of major developments and residents consulted ahead of completion to ensure appropriate parking controls are implemented before issues arise. The Council would engage residents about the design and timing of the zone rather than the need for a CPZ, which would be determined during the planning and delivery process.

6.24. Recommendations

- 8 Where significant parking problems are predicted as a result of developments a presentation of evidence and specific solutions will be considered on a case by case basis, to be approved by Mayor and Cabinet. Solutions may include residents being given a chance to influence the design of the CPZ, but not vote as to whether one will be implemented.

7. Changes to the charging structure and permit charges

7.1. Issue: Reviewing annual permit charges

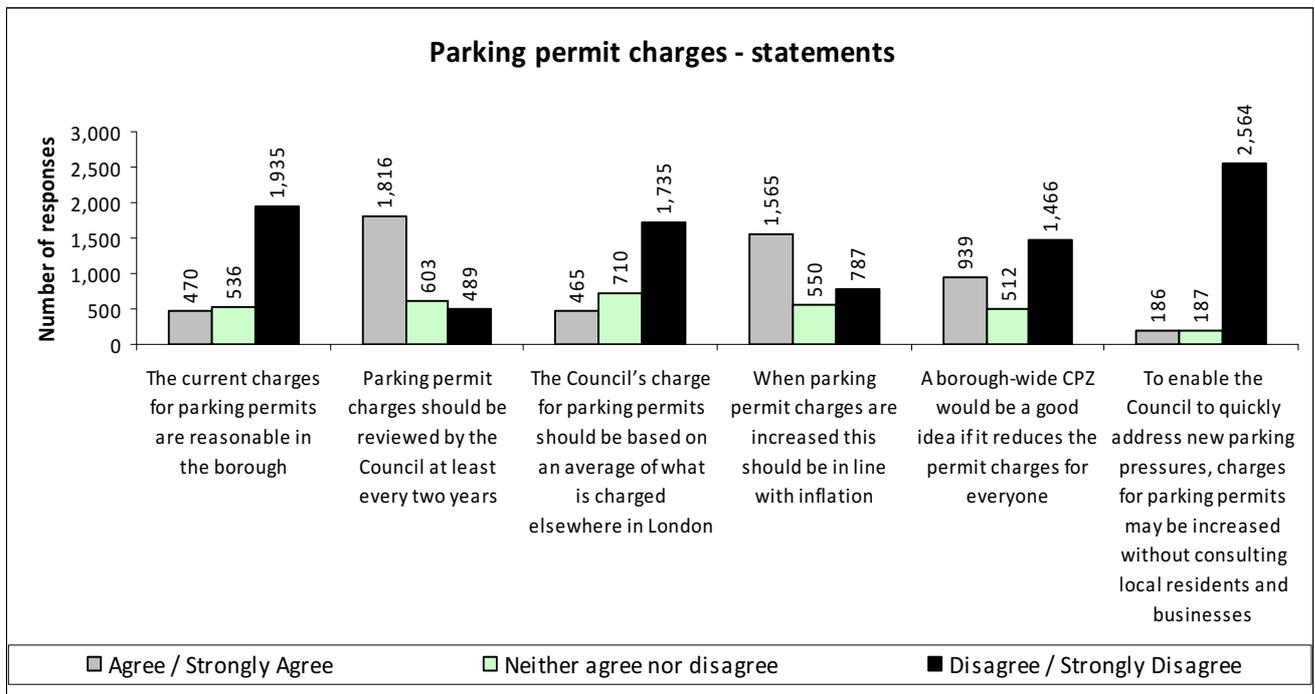
- 7.1.1. The operating costs for a vehicle can run into hundreds or even thousands of pounds when you take into account fuel, insurance, MOT, maintenance, road tax, breakdown cover, etc. Paying for parking is just one small element of the costs of keeping a vehicle. However, it is often a necessity for an individual or family to operate a vehicle due to circumstance.
- 7.1.2. The table below shows the estimated annual car running costs. It is based on The AA's annual estimate of motoring costs published in June 2012. The table is based on a sample of three different road tax bands and an average of 10,000 miles per annum.

Cost element	Tax band F (141-150 g/km)	Tax band H (166-175 g/km)	Tax band K (226-255 g/km)
	£ p.a.	£ p.a.	£ p.a.
Road Tax	135	195	270
Insurance	695	841	1,684
Petrol	1,293	1,484	1,905
Tyres	103	152	281
Servicing/MOT/maintenance	595	605	621
Total cost p.a. (Source: The AA)	2,821	3,277	4,761
Current Lewisham Resident Permit	120	120	120
Cost including parking permit	2,941	3,397	4,881
Permit as a%age of annual cost	4.1%	3.5%	2.5%

- 7.1.3. Parking permit charges were considered as part of a Council-wide review of fee income in late 2010. This review found that in many instances prices in Lewisham were below the median level across London, and recommended a series of price increases designed to raise prices to the projected London median, based on the assumption that other authorities would also be increasing their prices. Mayor and Cabinet agreed these recommendations in February 2011 as part of the budget setting process for the 2011/12 financial year, and the new prices were introduced on 3 May 2011.
- 7.1.4. The fee benchmarking exercise was repeated in autumn 2011. This found that other authorities had not increased fees to the extent that the original review had anticipated. It also found that price benchmarking was complicated by the number of pricing regimes in place across other boroughs, and that in most cases Lewisham's prices were not comparable. Of the five London authorities operating a simple pricing structure, Lewisham was at the median level: one authority charged more than Lewisham's £120

(Southwark - £125); one charged the same (Wandsworth); and two charged less (Richmond-Upon-Thames - £80, and Kingston-Upon-Thames - £90). It was therefore recommended and agreed that prices be frozen for 2012/13.

- 7.1.5. Since the price increases were implemented in 2011 the Council has received and considered a large range of feedback from residents, community groups and local assemblies.
- 7.1.6. The current charges for resident and business permits in Lewisham are at the high end when compared to the other 13 London Boroughs that have flat-rate charging structures. (See Appendix F)
- 7.1.7. Some residents have expressed the view that the current permit charges are too high. As Appendix B shows, respondents felt that the various permit charges were not reasonable. The graph below shows the level of support for various parking statements.



- 7.1.8. Business Permits are currently charged at £500. When comparing this charge to other London Boroughs (Appendix F), Lewisham is at the high end of charges with only Southwark (£577.50), Merton (£752, £376 for 6 months) and Hammersmith and Fulham (£766) charging more.
- 7.1.9. **Assume no net change to revenue:** In considering a review of permit charges, the Council must take into account its wider budget position. Income from parking related sources is an important part in the Council's overall financial position.
- 7.1.10. Income from parking is used to cover the costs of the Parking Service, including the cost of implementing, reviewing and enforcing CPZs. It also contributes to highway and transport improvements across the borough.
- 7.1.11. The Council is currently reviewing its wider budgets in order to make savings of £50 million in line with the reduction of funding from central government.

Any shortfall from the parking budget would ultimately impact on other public services offered by the Council. For further details on parking finances see Section 12, of this report.

7.2. Options

- 7.2.1. The options for the policy review are therefore framed by the general assumption that there should be no significant net change to the parking revenue budget.
- 7.2.2. However, within this assumption there is scope to offer concessions or offset costs either within a review of the charging structures, or within a longer term view of CPZ growth that may reasonably occur in response to current and developing parking pressure, provided that pricing is set in a customer-focussed way that encourages CPZs to be implemented where necessary.
- 7.2.3. **Future reviews of parking charges:** There was broad support for the Council reviewing permit charges at least every two years and that increases should be linked to inflation in some way. Both of these approaches have been considered as possible recommendations for inclusion within the parking policy.
- 7.2.4. In response to this view, options to review the charges annually and every two years have been considered. A range of options has also been considered for limiting any increases to inflation, including various inflation rates such as the Retail Prices Index (RPI), Consumer Price Index (CPI), the Council's budgetary inflation assumptions, and the inflation of costs in the parking service contract.

7.3. Conclusions

- 7.3.1. In the current economic and budgetary circumstances, it is essential that the Council does not significantly impact on its wider budgetary position. However, the Council is keen also to offer support wherever possible, given the financial pressures that many residents are facing, and the public view that the charges are high.
- 7.3.2. The review will therefore seek concessions to the current charge of £120 for residents, where these concessions are deliverable within a review of the charging structures, and where they are supported by a strong policy rationale.
- 7.3.3. The review will also aim to establish a charging regime for residents and visitors that is more customer-focussed and encourages CPZs to be implemented where they are a necessary solution.
- 7.3.4. In respect of these considerations, the review proposes to freeze the new charges set by this review until at least 2015/16, and to review the charges on an annual basis to take account of financial pressures.
- 7.3.5. It is proposed that future increases to parking charges, shall be limited by inflation wherever possible. Any future increases to parking charges, that

exceed inflation, will require consultation prior to implementation, to ensure that the views of the public can be taken into account.

7.4. Recommendations

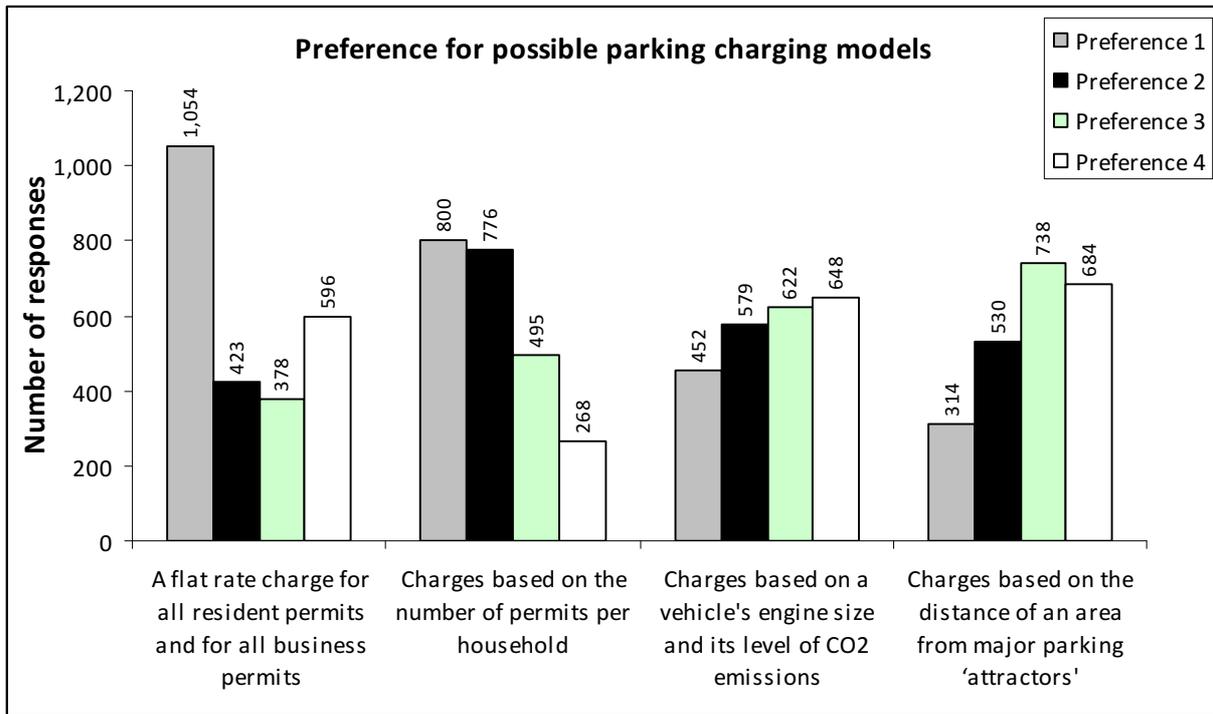
- 9 Introduce a new charging model that is customer-focussed, offers affordable concessions to residents and visitors, and is supported by a strong policy rationale.
- 10 The new parking permit charges will be frozen at the new levels until the 2015/16 financial year and reviewed annually thereafter to take account of financial pressures.
- 11 Consult the public on any future charge increases that exceed inflation.

7.5. Issue: Considering the charging model and proposed charges

- 7.5.1. Lewisham offers a variety of permits to park in a CPZ to cater for residents, their visitors, businesses, and carers.
- 7.5.2. Lewisham operates some relatively simple charging structures for these permits when compared to other authorities. For instance, there is a single price (currently £120) for a resident parking permit.
- 7.5.3. Community groups such as Lee Green, as well as this Committee, have identified the need to investigate some of the differential charging structures operated by other London authorities.
- 7.5.4. The policy review has included a financial modelling exercise in order to consider the impacts of various policy options, permit costs, and charging structures.

7.6. Consultation and feedback

- 7.6.1. In the public survey, respondents were asked to indicate their preference for four different charging models on which permit prices might be based in the future. The graph below shows that the respondents preferred either a flat-rate charging model, or charges based on the number of cars per household.



7.6.2. Each of the charging models were considered for analysis and this is set out below.

7.7. Options

7.7.1. The baseline used for all analysis takes account of the current level of permit sales and the projected quantity of income for 2012/13. Assumptions made as part of the financial analysis are contained in Appendix H.

	Projected 2012/13	
	Qty	Sales Total
Business Permits	1,256	540,000
Resident Permits	7,485	862,000

7.7.2. **Maintain a flat-rate charging model:** this would maintain the status quo for charging a flat rate on permit charges for resident (currently £120) and business (currently £500) permits. A benchmarking exercise was carried out to look at how the other 32 London Boroughs charge for parking and this is contained in Appendix F.

7.7.3. Flat-rate models benefit from being simple to administer, and clear to understand. In the public survey, more respondents selected the flat-rate charging model as their top preference over the other three models presented as options. It can also be considered as a fair model, as charges are applied equitably for all permit holders.

7.7.4. However, a flat rate does not necessarily support other policy objectives, such as incentivising fuel-efficient vehicles, or minimising demand for kerb-side space.

- 7.7.5. **Vary prices by a vehicle's engine size and its level of CO₂ emissions:** This charging structure would provide an incentive to purchase more fuel-efficient vehicles and as such, would support the Council's green agenda and London's air quality objectives.
- 7.7.6. This model would vary permit charges according to the tax band for each vehicle, and concessions would be offered to those with more efficient vehicles, offset by increased charges for those with inefficient vehicles. This model would target no net increase in revenue for the Council. However, over time as cars become more efficient, income would diminish, when residents replace their vehicles for lower emission alternatives.
- 7.7.7. There are nationally set bandings for vehicle engine size and CO₂ emissions which are held by the DVLA and used to calculate car tax charges. These 15 bandings were used as part of the analysis carried out when considering this as a charging model for permits in Lewisham. Appendix F shows that 12 London Boroughs have an emissions based charging model. However, due to the complexity of administering a model that has 15 charging bands most, except Islington, have consolidated these bands into 8 or less.
- 7.7.8. Below is the profile of vehicle ownership by emissions band for the whole of Lewisham borough. The data for cars by CO₂ emissions has been sourced from the DVLA and is 2011 data. The data is only provided at borough level, so we have assumed this is an equal distribution across all areas of the borough i.e. each of the current CPZs would have this same vehicle profile.

Total vehicles registered in Lewisham by Tax Band

CO₂ emissions (g/km)	No of vehicles
Band A: Up to 100	268
Band B: 101 - 110	1,075
Band C: 111 - 120	2,175
Band D: 121 - 130	2,198
Band E: 131 - 140	7,988
Band F: 141 - 150	9,058
Band G: 151 - 165	15,366
Band H: 166 - 175	7,515
Band I: 176 - 185	6,718
Band J: 186 - 200	8,213
Band K(L): 226 - 255	3,073
Band K(M): Over 255	2,008
Band K: 201 - 225	5,936
Band L: 226 - 255	633
Band M: Over 255	595

- 7.7.9. The table below shows that varying prices by these 15 bands would produce a wide variety of charges. If the average charge is based on Lewisham's current resident permit charge of £120, and if the most efficient vehicles have no charge, the analysis below shows that the vehicles with the highest levels of emissions or largest engine size would rise to £292.

CO₂ emissions based on tax bands

CO ₂ emissions (g/km)	Charging mechanism based on tax rate with £120 average	Resident Permits 2012	Income
Band A: Up to 100	£0	28	£0
Band B: 101 - 110	£12	111	£1,000
Band C: 111 - 120	£18	224	£4,000
Band D: 121 - 130	£62	226	£14,000
Band E: 131 - 140	£74	821	£61,000
Band F: 141 - 150	£83	931	£77,000
Band G: 151 - 165	£105	1,579	£166,000
Band H: 166 - 175	£120	772	£93,000
Band I: 176 - 185	£132	691	£91,000
Band J: 186 - 200	£154	844	£130,000
Band K(L): 226 - 255	£166	316	£52,000
Band K(M): Over 255	£166	206	£34,000
Band K: 201 - 225	£166	610	£101,000
Band L: 226 - 255	£283	65	£18,000
Band M: Over 255	£292	61	£18,000
		7,485	£861,000

7.7.10. The table below shows that this model has also been considered with the 15 bands consolidated into 4 bands, in order to make the model more administratively viable. Again, this model would target no net increase in revenue for the Council.

CO₂ emissions using 4 bands

CO ₂ emissions (g/km)	Charging mechanism 4 bands	Resident Permits 2012	Income
Bands A to D: 0 - 130	£60.00	588	£35,000
Bands E to G: 131 - 165	£100.00	3,331	£333,000
Bands H to J: 166 - 200	£140.00	2,307	£323,000
Bands K to M: Over 200	£180.00	1,259	£227,000
		7,485	£918,000

7.7.11. As can be seen from the analysis above in order to maintain the current levels of resident permit income, charges would have to be above the current £120 charge for vehicles with emissions levels at the higher end of the scale. It is often older (pre March 2001) or very large vehicles that have higher levels of emissions, whereas many of the newer cars have the lower emissions levels and are exempt from car tax and the London Congestion Charge.

7.7.12. The table below shows how many residents would have to pay more for their permit, as a result of the increased charges.

Analysis of the impact on residents

CO ₂ emissions (g/km)	Residents charged more	Residents charged less	Residents charged the same	Income
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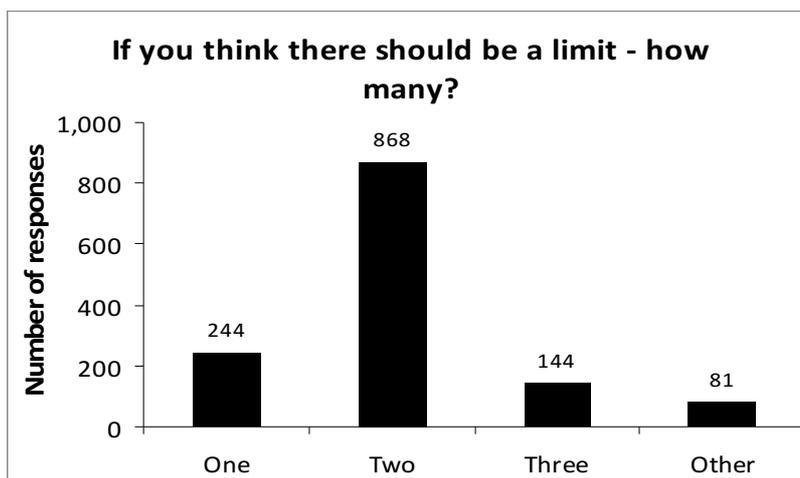
CO₂ emissions - 15 bands	2,813	3,920	772	861,000
CO₂ emissions - 4 bands	3,566	3,919	0	918,000

- 7.7.13. A key concern with this charging structure is that, while there is a strong rationale for incentivising efficient vehicles, penalising those with inefficient vehicles could disproportionately affect those who own older vehicles.
- 7.7.14. Consideration was therefore given to how the Council might promote sustainable transport and thus analysis was done to look at providing a concessionary rate for those with cars in the lowest emissions bands (A-D). This option has been modelled with two concessionary rates one of £60 and the other of £90.

A concessionary rate for the most efficient vehicles

CO₂ emissions (g/km)	Resident Permits 2012	Charges	Income	Charges	Income
Bands A to D: 0 - 130	588	£60.00	£35,300	£90.00	£52,900
All other bands	6,897	£120.00	£827,700	£120.00	£827,700
	7,485		£863,000		£880,600

- 7.7.15. **Vary prices by geographical location:** This charging structure would vary charges according to the level of parking demand, with increased charges in more central parts of the borough, and reduced charges in the more suburban residential areas.
- 7.7.16. The rationale for this charging structure is based on the idea that higher permit charges would deter people in busy central areas from owning a car. There are some key concerns with this model, which would affect those on low incomes who rely on a car. In particular, a retrospective application of this policy would unfairly affect many who have already chosen to live in central areas.
- 7.7.17. This option did not receive a high level of support in the survey or the stakeholder events and has thus been discounted. This is not a popular option among other authorities, and could be overly complex to administer.
- 7.7.18. **Vary prices by the number of vehicles per household:** This charging structure would vary charges according to the number of permits required per household. This would support the Council's sustainable transport policies, which encourage people to reduce their reliance on the private car. In particular, it would help to manage demand for kerb-side space.
- 7.7.19. This was a very popular option for respondents of the survey and at the stakeholder events. Two-thirds of respondents indicated that they had just one car in their household. A quarter had two or more vehicles. The majority of respondents indicated that there should be a two permit limit per household.



7.7.20. From the benchmarking work contained in Appendix F 20 London Boroughs charge more for the second or subsequent resident and business permits. On average the second and subsequent permits cost £50 more than the first.

7.7.21. The table below shows the possible reduction in charges for a first resident permit of £100 and £90. It also shows the charges required for additional cars assuming no net change in revenue.

Possible charges for first and additional permits

	Resident Permits 2012	Lewisham charging mechanism	Income	Lewisham charging mechanism	Income
First Car	5,852	£100.00	£585,000	£90.00	£527,000
Additional Cars	1,633	£170.00	£278,000	£200.00	£327,000
	7,485		£863,000		£854,000

7.8. Conclusions

7.8.1. The policy review has considered a range of alternative, differential charging structures. A flat rate charge is the clearest and most easily administered. It was also popular in the public survey, with more respondents selecting it as their top preference.

7.8.2. However, varying prices according to the number of permits per household was also a popular choice: more respondents selected this as their first or second choice combined, than any other model. This would support the Council’s sustainable transport policies and would help to manage demand for the limited amount of kerb-side space available. By increasing the charge for a second and subsequent resident parking permit, the charge for households with only one car could be reduced.

7.8.3. For example increasing the charge for a second or third car to £150, would enable the charge for the first permit to be reduced to £110. For a household with two permits, currently charged £240 (£120 each), the new charges for the household would amount to £260. This represents an additional charge of £10 per vehicle. If the charge for the second or third vehicle was increased to £160, that additional charge would be £15 per vehicle.

7.8.4. There is also a strong policy rationale for varying the prices based on fuel-efficiency. This supports the reduction of CO₂ emissions and improvements in air quality. This was only the third most popular model out of four, and there are concerns about applying additional charges to those with the oldest or least efficient vehicles. However, offering a concessionary rate for the most efficient vehicles (those rated in Bands A and B) would support the green agenda whilst addressing these concerns. Examples of Band A and B cars are Toyota Prius, Fiat 500, Volkswagen Polo Blue, Smart cars and most hybrid vehicles. In addition, many popular non-hybrid vehicles produced after 2010 have very low emissions.

7.8.5. The review will therefore recommend a charging model with a strong policy rationale, offering a reduced charge for the first vehicle (£110), an increased charge for subsequent permits (£150), and a concessionary rate to permit holders with the most efficient vehicles (£30).

CO₂ emissions (g/km)	Resident Permits 2012	Charging Mechanism	Income	Charging Mechanism	Income
Bands A and B	138	£30	£4,000	£30	£4,000
First Car	5,744	£110	£632,000	£110	£632,000
Additional Cars	1,603	£150	£240,000	£160	£256,000
	7,485		£876,000		£892,000

7.8.6. The proposed move away from a flat charging structure introduces a degree of complexity that needs to be managed and administered to ensure that it is fair, robust and supports the policy rationale. This will require new scheme rules and a new refunds policy.

7.8.7. For example, this will set out qualification requirements for the £30 concessionary permit. Only one low-emission vehicle per household will receive the £30 concession. This reflects the need to manage kerb-side space, regardless of how efficient the vehicle type. This means that all second and subsequent cars, regardless of engine size, will be subject to the £150 charge.

7.8.8. Resident permits for the first vehicle (£110) and additional vehicles (£150) are available in 3-month and annual permit types. For a £110 permit, the 3-month charge will be £28 (£27.50 rounded up). For a £150 permit, the 3-month charge will be £38 (£37.50 rounded up).

7.8.9. However, the £30 is only available as an annual permit. The low cost of this permit makes it inefficient to offer on a 3-month or 6-month basis. Similarly, if a vehicle is changed throughout the year to a low-emission vehicle, the £30 concession will only be received upon renewal of the permit.

7.8.10. Business permits are available in 6-month and annual permit types (maintaining the current charges for both).

7.8.11. A refunds policy will need to be developed to take account of those who get a second car that is entitled to the £30 concessionary rate for low-emission vehicles, but who already hold a £110 permit on their first vehicle. This will

include a clear policy around the transferring of registration numbers between permits.

7.9. Recommendations

- 12 Introduce a concessionary rate (£30) to permit holders with the most efficient vehicles (e.g. Tax Bands A-B).
- 13 Either, maintain the current flat-rate charging model at £120, or introduce a lower rate of £110 for the first resident parking permit by charging a higher rate of £150 for additional vehicles.
- 14 Introduce new scheme rules and a refunds policy governing the new permit charges.

7.10. Issue: Additional support for those who rely on visitors

7.10.1. Some residents have expressed concerns about the cost of visitor permits. One of the major concerns with the cost of parking to visitors is the adverse impact on those on low incomes, or those who may feel socially isolated.

7.10.2. The current visitor permits offered and the associated charges are set out below.

Charging Period	Rate
Hourly	£1.40
Batch of 10 * 1-Hour	£10.00
Half day rate	£2.80
Full day rate	£5.60
Weekly rate	£28.00

7.10.3. The costs to the Council associated with issuing visitors permits are as follows:

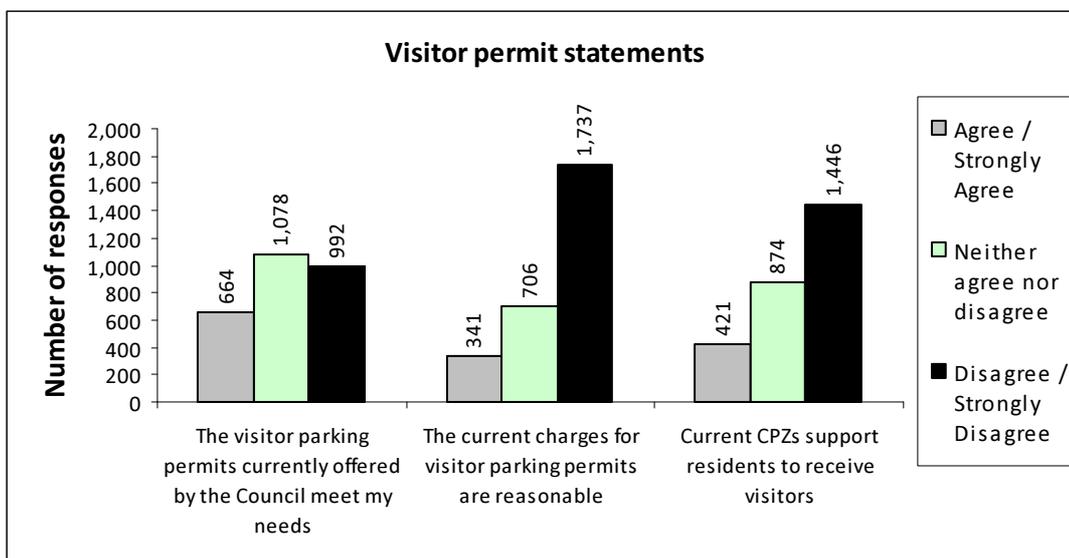
Element	Cost
Voucher production	£1.00
Postage	£0.36
Administration ²	£0.10
Total	£1.46

7.10.4. In the benchmarking in Appendix F, many London Boroughs offer half day and full day permits. Only 5 offer permits valid for a shorter time period and many of these are only available in books rather than individually. Comparatively Lewisham has the highest charge for hourly permits, but our daily charge is about average. Many other Boroughs offer a number of free visitor permits to resident permit holders and free or discounted visitor permits to those over 60 or 70.

7.11. Consultation and feedback

7.11.1. In the survey respondents were asked if they purchased visitor parking permits and 1,418 responded that they did. (See Appendix B)

7.11.2. However, there was a clear majority view that the charges for these permits were not reasonable. The graph below also highlights the concern that respondents had over those in CPZs being able to receive visitors.



7.11.3. During the stakeholder events feedback suggested that receiving visitors for vulnerable people, who do not qualify for a carer parking permit or those on low incomes, was an issue with social isolation of the vulnerable sited as a major concern. These views were corroborated by the group responses received from the various community groups as well as the free text responses in the survey.

7.11.4. Respondents were also asked which types of visitor parking permits the Council should make available and the top choices were: Weekly, Daily,

² The administration (staff) costs are based on 2 minutes time of a person on a salary of £20,000 pa.

Half-day (5 hours) and 1-hour. These are the visitor parking permits currently available.

7.12. Options

- 7.12.1. **Reduce the price of visitor permits:** A range of options to reduce the price of visitor permits has been considered as part of the review. As the cost of issuing visitor permit vouchers is £1.46, any reduction on the hourly rate (currently £1.40) would impact significantly on the Council's financial model. This also has a knock-on effect on the half-day and full-day rates, which need to be aligned in proportion with the hourly rate.
- 7.12.2. However, for those expecting visitors staying for longer periods, a concession could be offered on the weekly permit. There is also a clear rationale for offering a reduced rate for longer stays, provided that the costs are not so low as to attract a high volume of additional vehicles from other parking places.
- 7.12.3. **Free visitor permits:** The review has considered the option of issuing free visitor parking permits to residents for their visitors. Aside from the financial impact, this would create concerns in areas of high parking demand, and such a widespread approach would undermine the demand management function of CPZs, which control the limited availability of kerb-side space.
- 7.12.4. A number of specific concessions have been considered, such as concessions for nannies and those who do not own a car. Concessions can only be offered where they can be fairly administered, and where take-up can be reasonably managed. This is essential to avoid misuse or over-supply of permits which could undermine the effectiveness of the scheme, with unforeseen impacts on revenue and kerb-side demand.
- 7.12.5. However, a limited number of free visitor permits could be issued to permit holders. This would offset some of the cost of visitor permits, and to some degree would offset the cost of the resident permit. Offering 10 free 1-hour visitor permits would limit the impact on demand management.
- 7.12.6. Similarly, this approach could be used to target assistance at those in society who suffer from social isolation, and who do not own a vehicle. A limited number of free 1-hour permits could be offered to residents over 60 who are in receipt of financial support. A book of 10 free 1-hour visitor permits will reduce the financial burden for many who rely on visits from friends and family.

7.13. Conclusions

- 7.13.1. The policy review therefore recommends, for resident permit holders, a range of concessions for visitors, including a reduction in the cost of weekly visitor parking permits, and a book of ten (1-hour) visitor parking permits free of charge on application.
- 7.13.2. The policy review also recommends the provision of 10 (1-hour) visitor parking permits free of charge (on application) to residents over 60 in receipt of council tax support, that do not possess another parking permit.

7.14. Recommendations

- 15 Reduce the cost of weekly visitor parking permits from £28 to £20 per week.
- 16 On application provide a book of 10 visitor parking permits (1-hour) free of charge to all households that currently have at least one resident parking permit holder.
- 17 On application provide a book of 10 visitor parking permits (1-hour) free of charge to residents in CPZs that are over 60 and in receipt of council tax support and do not have another parking permit.

7.15. Issue: Additional support for those who require constant support and care

- 7.15.1. Those who require constant help and care (and do not own a vehicle) are currently entitled to a carer parking permit at a concessionary rate of £65. Carer permits are issued to the resident who then allows the permit to be used by the carer to display in their vehicle as they do not carry a specific registration. These permits are valid for a 4-hour period.
- 7.15.2. The consultation process has involved a wide range of discussion and feedback with representatives of the community such as Deptford Action Group for the Elderly, The Pensioner's Forum, Age UK and Carers Lewisham.

7.16. Options

- 7.16.1. **Review the concessionary rate for carers:** As part of the review, the financial impacts of a range of changes to the charge for a carer permit have been assessed.

7.17. Consultation and feedback

- 7.17.1. In the survey, and at the stakeholder events, respondents considered that the charge for carer parking permits was not reasonable. Many of the comments received in the survey and the group responses expressed the view that carer parking permits should be free of charge.

7.18. Conclusions

- 7.18.1. The policy review proposes that carer parking permits will be provided free of charge. As part of this change, the robustness of the criteria and application process for a carer permit will be reviewed to ensure that this new provision is not open to abuse.

7.19. Recommendation

18 Provide carer parking permits free of charge.

7.20. Issue: Supporting business and the local economy

- 7.20.1. The provision and management of parking is a vital issue to businesses and the wider local economy. Many local businesses rely on safe and reliable access to enable essential journeys, including staff, customers, and the delivery of supplies of their premises.
- 7.20.2. Many local businesses also rely on the ability to make deliveries to customers in the type of town centre and residential areas which are typically affected by high demand for parking, and which are often within CPZs.
- 7.20.3. It is therefore important to the local economy to manage demand for kerb-side space to facilitate these essential journeys.
- 7.20.4. Most notably, in May 2011 the Government announced that Mary Portas was going to carry out a review of high streets in England to halt the decline of local town centres. In December 2011 the Government published Portas's report and made a series of recommendations, including the provision of free car-parking to attract shoppers.
- 7.20.5. In July 2012, the Sydenham, Kirkdale and Forest Hill Town Team submitted a successful Portas Pilot bid and will be among the first in the country to receive up to £100,000 of government funding to help regenerate the area's high streets.
- 7.20.6. In response to Mary Portas's views on providing free parking to stimulate high streets, London Councils recently commissioned a review of research about the links between parking and local economies.
- 7.20.7. This review presented a more complex picture, concluding that more parking does not necessarily mean more trade, with pedestrians spending more money in town centres than motorists. It pointed to a good mix of shops and an attractive environment as being amongst the most important factors. It also suggested that well-managed parking, where spaces turn over frequently, could help to increase the number of visitors to a town centre.

7.21. Consultation and feedback

7.21.1. **Local businesses:** Of the 1,017 business permit holders in 2011/12, 59 responded to the public survey. These 59 either disagreed or strongly disagreed with the following statements:

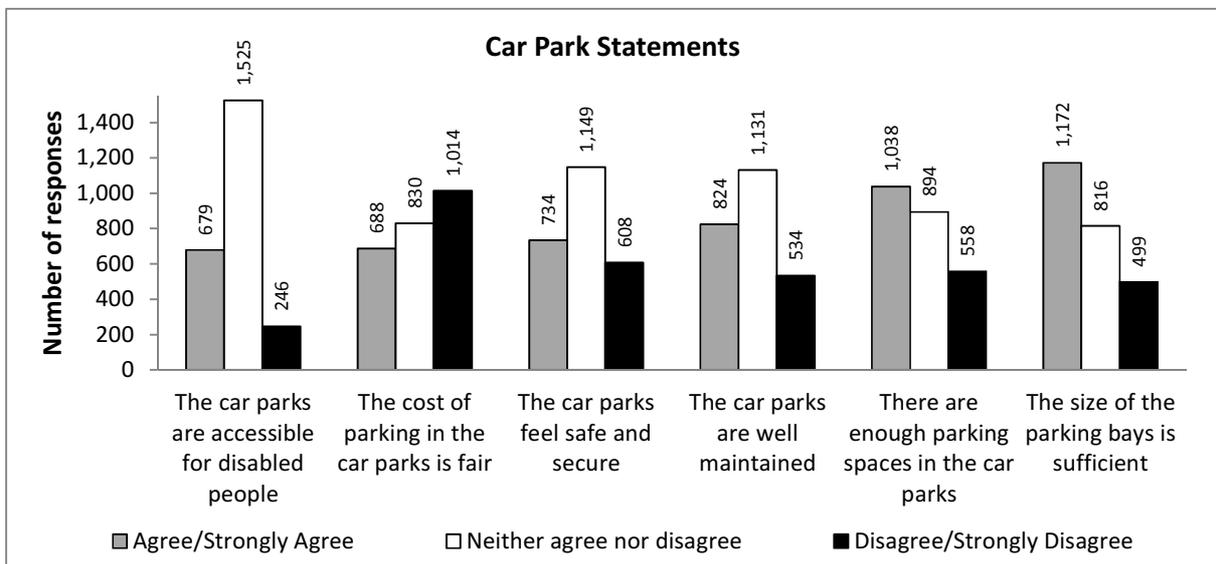
- Current charges for business parking permits are reasonable
- The space available for business deliveries in the borough is sufficient
- Current parking controls support local businesses.

7.21.2. The majority of people who responded to the questions, in the public survey, (did not have a business permit) about the parking provision near local business hubs, disagreed or strongly disagreed with the following statements:

- On-street parking for customers near local businesses is adequate
- Current time limits for free parking bays near local businesses are reasonable.

7.21.3. During the stakeholder events the issue of the duration of free short-stay bays near business hubs was also raised with many feeling that 1-hour would be more appropriate to allow free parking during appointments, which may take longer than 30-minutes. The need for sufficient Pay and Display provision near local business hubs was also raised.

7.21.4. **Car parks:** Respondents to the public survey were asked whether they agreed or disagreed with a number of statements. As can be seen from the graph below respondents either agreed or strongly agreed with all the statements except whether the cost of parking in car parks was fair.



7.21.5. As the level of business permit holders that responded to the public survey is low, it could be suggested that there are no strong views amongst business permit holders about the current charges. Whilst many of those that responded felt that the business permit charge was high, it is more cost effective when compared to the cost of using Pay and Display on a daily basis.

7.22. Options

- 7.22.1. **Business permit charge** – The business permit allows businesses to access parking near their premises. It also contributes to the CPZ system that manages parking demand and facilitates essential journeys for businesses. Options to change the current business permit charge of £500 per annum have been reviewed. However, the public survey did not provide strong evidence to amend the current charge, which provides a significant concession in comparison to the daily Pay and Display charges.
- 7.22.2. **Free short-stay spaces** - Free parking spaces are often provided to help people to make short visits to local shops or amenities.
- 7.22.3. Generally these free spaces are time limited to short-stay parking, which usually provides enough time for short visits, and encourages a better turnaround of shoppers for local businesses.
- 7.22.4. The optimum time for free short-stay spaces varies from location to location, and will depend on the nature of the businesses and facilities in the area. A 30-minute period usually offers the best provision.
- 7.22.5. Allowing free parking for longer (e.g. 1-hour) often has a detrimental impact on local business as turnaround of shoppers is reduced. A 1-hour limit is also more resource intensive for enforcement, and therefore is more prone to misuse.
- 7.22.6. **Car park pricing policy** – The current pricing structure for car parks is aligned with the pricing policy for on-street Pay and Display. With the exception of the Girton Road car park which is free. All other car parks³ managed by the Council charge £1.40 per hour with a number having an initial short-stay period free.
- 7.22.7. Many local authorities operate different tariff structures for on-street and off-street parking. This is a useful way of encouraging visitors to make best use of the available infrastructure. This usually means having higher prices for Pay and Display for on-street parking or near town centres where space is often at a premium. (See Appendix F for details of prices charged by other local authorities)
- 7.22.8. A variety of tariff models can also be used to encourage commuters to use under-utilised car parks, or to encourage shoppers to use particular shopping areas.

7.23. Conclusions

- 7.23.1. The business permit and CPZ system manages parking demand and facilitates essential journeys for businesses. As the public survey did not provide strong evidence to amend the charge, it is proposed that the current business permit charge be maintained.
- 7.23.2. In areas where short-stay capacity is required to support local businesses, free short-stay bays will continue to be implemented in the vicinity of local shopping parades and high streets. Any new bays will generally be limited to

³ A full schedule of car park prices can be found on the Council's website at [car parks](#)

30-minutes. However, where there are particular local circumstances requiring a 1-hour free bay, such requests will be considered by exception.

7.23.3. As the current charges for car parks and Pay and Display were revised recently as part of the Council-wide review of fees and charges in 2011 and due to the cost of updating machines, and the fact that our pricing is about average when compared to other London Boroughs (see Appendix F), it is not proposed to revisit the cash Pay and Display charges as part of this review.

7.23.4. In response to the discussion on the Portas Pilot, car park pricing would in the future be assessed on an individual basis, to reflect the local demand and economic circumstances, but would need to consider the need for simplicity and a reasonable limit on the number and complexity of different tariffs. However, each car park will be expected, as a minimum, to cover the cost of its own maintenance and management arrangements.

7.24. Recommendations

- 19 Maintain the current annual charge for a business parking permit (£500).
- 20 Maintain the current charges for car parking and on-street Pay and Display facilities.
- 21 Maintain the implementation of free short-stay bays of 30-minutes near business hubs, but consider a longer duration of 1-hour in specific circumstances.

7.25. Issue: Improving provision for Blue Badge Holders

7.25.1. It is important to ensure that people with disabilities are able to park safely and conveniently near their homes. The national rules governing the Blue Badge scheme do not generally permit parking in CPZs. The current policy therefore aims to assist by offering a free resident permit to all Blue Badge Holders.

7.25.2. However, in some CPZ areas with few kerb-side parking places, parking pressure can remain relatively high, particularly outside the operating hours. When Blue Badge Holders live in such areas, their free resident permit does not always enable them to park close to their home, and so there is often a demand for a Disabled Parking Bay.

7.25.3. There are two types of disabled bays: mandatory disabled bays are official bays which are only available to vehicles displaying a valid Blue Badge. Anyone parking in such a bay without a valid Blue Badge will be liable for enforcement action. Advisory disabled bays are unofficial bays, and provide an indication to the public that the space is required by a disabled person.

7.25.4. Over recent years, the provision of mandatory and advisory bays has not been consistently applied across CPZ and non-CPZ areas, leading to problems where bays have been used inappropriately.

7.25.5. As well as supporting Blue Badge Holders in their own streets, the policy review aims to offer support to those wishing to travel to other CPZ areas in the borough. Blue Badge Holders often need to park for a very short amount

of time, for example, close to a shop, or cash machine or need additional time when being dropped off at a friend's house or to load or unload shopping.

- 7.25.6. Blue Badge Holders are permitted to park on yellow lines (when there is no additional loading restriction) or in Pay and Display bays free of charge for a maximum of 3-hours. However, in many residential areas yellow lines are not conveniently located. As the national rules governing the Blue Badge scheme do not permit parking in resident only parking bays, other solutions are required to help build-in capacity by introducing parking spaces that can be used by Blue Badge Holders.

7.26. Consultation and feedback

- 7.26.1. There are 7,200 Blue Badge Holders in the borough. Of these 107 responded to the survey. Respondents were asked if they currently use a disabled parking bay in their road and 22 respondents indicated that they did.
- 7.26.2. Of these 22 respondents, 6 used formal disabled bays, 10 used informal bays and 6 didn't know what type of bay it was.
- 7.26.3. Those who do not currently use a disabled bay, whether informal or formal, were asked if a bay was needed and 31 respondents indicated that a disabled bay was needed.
- 7.26.4. During the stakeholder events and outlined in the group responses from community groups the use of resident parking bays by Blue Badge Holders was raised a number of times as well as the use of formal disabled bays by non-Blue Badge Holders.

7.27. Options

- 7.27.1. **Allow advisory bays outside CPZs:** Advisory bays work very well in areas where parking pressure is not too high, and generally work well in non-CPZ areas where parking is free. Advisory bays are relatively quick and cheap to introduce, as the legal process required to make them official and enforceable is not required.
- 7.27.2. **Allow advisory bays in CPZs:** Allowing advisory bays in CPZs would enable disabled bays to be implemented cheaply and quickly in response to demand from the public. However, advisory bays pose a problem in CPZs, as anyone is entitled to park in the bays. This creates confrontational situations that the Council is unable to resolve through enforcement.
- 7.27.3. However, as these advisory bays would be un-enforceable, this approach would be very susceptible to widespread abuse, which would impact on disabled people who would often be unable to park close to their homes.
- 7.27.4. **Allow only mandatory bays in CPZs:** Allowing mandatory bays in CPZs would allow Blue Badge Holders in busy areas to park reliably in their streets. This option would also enable the Council to provide the enforcement necessary to ensure the bays are used correctly. In order to

make mandatory bays official and enforceable, a legal process is required called a Traffic Management Order. The cost of this order process can range from £1,700 up to around £3,000. The cost means it is not always possible to implement individual mandatory bays on request.

- 7.27.5. **Allow no disabled bays in CPZs:** The option of not allowing any disabled bays in CPZs would be straightforward to implement, and would provide a clear policy. However, it would mean that disabled people living in some busy streets will often be unable to park close to their homes. The consultation demonstrates that approximately 20% of Blue Badges Holders make use of disabled bays in their streets.
- 7.27.6. **Allow Blue Badge Holders to park in resident only parking bays:** The national rules governing the Blue Badge scheme do not generally permit parking in resident only parking bays. The Council could adopt a local policy that contravenes the national scheme. Such a policy would allow Blue Badge Holders to park for free in any CPZ in the borough. However, there are 7,200 Blue Badge Holders, almost as many as there are resident permit holders. This would create an unmanageable demand for parking in certain residential areas, for example, around the hospital, health centres, or popular rail stations. Deviating from the national scheme may also have other consequences, such as attracting Blue Badge Holders from other boroughs.
- 7.27.7. **Build-in shared-use bays:** Shared-use bays are parking spaces that can be used for more than one purpose. For example, certain bays could permit parking for Pay and Display and for resident permit holders. Alternatively, bays could permit parking for resident permit holders or for Blue Badge Holders.
- 7.27.8. As the national rules governing the Blue Badge scheme do not generally permit parking in resident only parking bays, such bays could be used to help Blue Badge Holders find appropriate parking spaces when travelling to other CPZ areas in the borough. These measures would be supplemented by the new concessions offered to assist all visitors, including Blue Badge Holders, who need to park in residents bays (7.14).
- 7.27.9. **Allowing Blue Badge Holders to drop-off in CPZs:** In CPZs, all vehicles are currently allowed to pick-up or drop-off passengers. They are entitled to load or unload items or other goods for up to a period of 20 minutes providing this activity is seen during the 5 minute enforcement observation period. This is intended to help those who may require more time to carry out this activity. It is not intended to allow short-stay parking. Therefore this activity must be constant. The observation period is required to assess whether any loading activity is taking place before issuing a parking penalty.
- 7.27.10. There is a practical limit to the amount of time allowed, as such activities must be accompanied by a viable enforcement regime, and must not create high demand that undermines the effectiveness of the CPZ.

7.28. Conclusions

- 7.28.1. In non-CPZ areas, advisory bays currently provide a cheap and workable solution. The review therefore proposes to retain this policy approach.
- 7.28.2. In CPZ areas, the review concludes that advisory bays should not be introduced in CPZs, as they are self-defeating and undermine the enforcement of the CPZ. There are some examples of advisory bays being retained when CPZs have been introduced. Any advisory bays in CPZs should be removed and, where necessary, replaced with mandatory bays.
- 7.28.3. The consultation demonstrates that of those Blue Badge Holders that responded a significant proportion (approximately 30%) require a disabled bay. There are therefore potentially hundreds of Blue Badge Holders who may request a new disabled bay, whether mandatory (CPZ) or advisory (non-CPZ).
- 7.28.4. The policy review proposes to establish a process to assess and implement requests for disabled bays. This will include an application process with set criteria to ensure that bays are necessary, safe and feasible. In particular, residents must hold a valid Blue Badge, and must reference a vehicle registered to their home address in Lewisham.
- 7.28.5. In order to manage and fund such requests, an annual programme will be established that will look at provision of disabled bays across the borough. This will include:
- new advisory bays outside CPZs;
 - new mandatory bays in CPZs;
 - conversion of advisory bays in CPZs to mandatory bays;
 - new shared-use bays;
 - removal of bays where no longer required.
- 7.28.6. This will be built into the annual CPZ Programme to ensure that costs are controlled and to ensure that an appropriate assessment can be made.
- 7.28.7. The 20-minute period for loading and unloading, and the 5-minute observation period to assess whether this activity is taking place, is deemed to be sufficient. It is proposed that these standards be maintained. Where there are extenuating circumstances that result in a penalty charge notice being unfairly issued, a robust appeals process is in place to take specific instances into account.

7.29. Recommendations

- 22 Continue to provide Blue Badge Holders with a resident parking permit free of charge.
- 23 Continue to facilitate the introduction of advisory bays in non-CPZ areas, but remove or convert advisory bays to mandatory bays in CPZ areas.
- 24 Establish an application process for disabled bays, with set criteria to ensure that these bays are necessary, safe and feasible.
- 25 Establish an annual programme, as part of the CPZ programme, for the provision and review of disabled parking across the borough.
- 26 Maintain the national scheme of a 20-minute period for loading or unloading items or other goods from the vehicle and maintain a 5-minute minimum

observation period to ascertain whether this activity is being carried out before considering enforcement actions.

8. Enhancing the transparency of parking policies, programmes and finances

8.1. Issue: Clear and accessible policy documentation

8.1.1. The current parking policy and operating procedures have developed significantly since the introduction of CPZs. The policy has therefore evolved incrementally over time and through successive committee reports. This has resulted in policy documentation that is fragmented and inaccessible.

8.2. Options

8.2.1. **Refresh all supplementary parking policies:** In addition to the key themes and objectives of the policy review, there are a wide range of supplementary parking policies and procedures. This includes our policies on short-stay parking, footway parking, cashless payment technologies, school parking, parking policies in support of sustainable transport such as electric vehicles and car clubs, and parking policies in support of car-free developments.

8.2.2. **Integrated parking policy document:** Collating all elements of parking policy into an integrated parking policy document would help to ensure that that parking policy is accessible and transparent.

8.2.3. **Future reviews:** The policy document could build in the opportunity to undertake further reviews in the future, to ensure that the policy is addressing the concerns and issues raised by the public.

8.3. Consultation and feedback

8.3.1. The paper prepared by the Lee Green Assembly and presented to Mayor and Cabinet in April 2012 sets out their desire for a clear and transparent policy so that rationale and decisions relating to parking can be clearly understood by those affected. At the stakeholder event these views were supported. (Appendix D)

8.4. Conclusions

8.4.1. The current policy review is the widest and most comprehensive review of parking that has taken place to date. This review therefore offers an ideal opportunity to undertake a wider refresh of all the Council's other parking policies and are included in Section 10 of this report.

8.4.2. All elements of the revised parking policy will be collated into a single integrated and accessible parking policy document, which will be reviewed at least every three years.

8.5. Recommendations

parking policy document.

28 Review the policy at least every three years.

29 Authorise the Executive Director of Customer Services and the Executive Director of Resources and Regeneration to approve the final policy document in line with the recommendations in this report.

8.6. Issue: An annually reviewed CPZ Programme

8.6.1. The Council currently operates a CPZ Programme in order to manage the implementation and review of CPZs. Over the past ten years, an annual budget of approximately £400,000 has been set aside in order to fund the design, consultation, implementation and review of CPZs. The pressures on this programme, and as such the demands placed on this budget, have varied from year to year, but demand is expected to increase in response to this review.

8.6.2. The annual budget for this programme was based on prudential borrowing in order to finance investment in highway infrastructure including CPZs. As the ten-year model is coming to an end, a new funding arrangement is required to ensure that CPZs can be implemented and reviewed.

8.6.3. Firstly, demand for new CPZs is expected to increase, both in response to the concessions on charges for residents (7.9) and for visitors (7.14). Demand for CPZs may also increase in response to the more flexible approach to operational hours (6.15).

8.6.4. Similarly, demand for a review of existing CPZs may also increase. In addition, new CPZs are automatically reviewed within 12 months of their implementation, to ensure that the design is working in practice, and to deal with any effects on neighbouring streets. When this does occur, following this review, mechanisms will be introduced to enhance the responsiveness to issues of overspill (6.10).

8.6.5. Finally, an annual review of disabled parking (7.29) will provide an additional element to the CPZ Programme.

8.7. Options

8.7.1. **Prioritised programme:** This option proposes to formalise the programme of implementation and review, with only the highest priority CPZs being implemented or reviewed each year. This would be informed by the standardised approach for collating public feedback identified in this report (6.19).

8.7.2. **Report annually:** In order to ensure the transparency of the programme, an annual report will be produced. This report would set out a prioritised programme for consultation or implementation of new or existing CPZs, including the basis on which the programme has been set out.

8.8. Consultation and feedback

8.8.1. At the stakeholder events and outlined in the Lee Green Assembly paper presented to Mayor and Cabinet in April 2012, it was felt that existing CPZs

should be reviewed in light of any policy changes made as a result of this review. Additional options such as 2-hour time periods for zones should now be included in these reviews.

8.8.2. The Lee Green Assembly paper also suggested that volunteers could be used to distribute consultation material during the reviews.

8.8.3. At the stakeholder events there was also consensus that resident groups and Local Assemblies should be consulted as part of any reviews as they were best placed to represent the views and needs of residents on parking issues.

8.9. Conclusions

8.9.1. With high demand for the review or implementation of CPZs, and a limited budget, a prioritised programme is needed to ensure that the most urgent issues are addressed first.

8.9.2. There are a number of factors in prioritising these issues and formulating a programme. These include factors that can be easily quantified, such as the number of requests made by residents, and other factors that cannot be easily assessed, such as the impact on road safety, or severe impacts on a limited number of people.

8.9.3. In order to ensure the transparency of the programme, an annual report will be produced. This report would set out a prioritised programme for consultation or implementation of new or existing CPZs, including the basis on which the programme has been set out.

8.9.4. In order to fund the CPZ Programme, a new investment model will be required that is financially sustainable. The CPZ Programme will therefore rely on the continued public demand for CPZs.

8.10. Recommendations

30 Establish a prioritised programme for the consultation, implementation and review of CPZs.

31 Establish a new funding model for the proposed CPZ Programme.

32 Report annually on the proposed CPZ Programme and on the delivery of the previous year's programme.

8.11. Issue: An annual report on parking related finances

8.11.1. The Council produces an annual statement of the revenue it receives from on-street parking. This is a legal requirement as part of Section 55 of The Road Traffic Regulation Act 1984 which requires an enforcement authority such as Lewisham to keep an account of:

- their income and expenditure under this Part of this Act in respect of designated parking places;
- their income and expenditure as an enforcement authority in relation to parking contraventions within [paragraph 2 of Schedule 7](#) to the 2004 Act (parking places); and

- their income and expenditure as an enforcement authority in relation to parking contraventions within [paragraph 3](#) of that Schedule (other parking matters).

Further detail is set out in the Legal Implications in Section 11 of this report.

8.11.2. In the April 2012 report from the Lee Green Assembly to the Council, a recommendation was made to publish transparent accounts with clear information about the various income streams and costs.

8.12. Options

8.12.1. **Enhanced and accessible annual report:** An annual report that goes beyond the minimum legal requirement for the provision of information would improve the transparency of the Council's parking related finances. A clear and accessible document, made available on the website, would help to explain the breakdown of income and expenditure, and would help to explain the rationale for the charging policy. However, the level of breakdown provided may be limited by practical constraints such as the data collection systems that are in place.

8.13. Consultation and feedback

8.13.1. In the April 2012 report from the Lee Green Assembly to the Council, a recommendation was made to publish transparent accounts with clear information about the various income streams and costs. This view was upheld during the stakeholder events.

8.14. Conclusions

8.14.1. In order to improve the transparency of the Council's parking related finances and to explain the rationale for the charging policy, the review proposes that an annual report be produced and made available on the website. The report should be a clear and accessible document, and provide, where practicable, a breakdown of income and expenditure.

8.15. Recommendation

33 Produce an enhanced and accessible annual report on parking related revenue.

9. Other policy areas

9.1. This section summarises a refresh of all the Council's supplementary parking policies, comprising:

- Parking at schools
- Other permits and concessions
- Time credits
- Payment methods
- Supporting parking policy through the planning process
- Specific-use bays
- Electric car charging bays

- Car pools and car clubs
- Motorcycles
- Footway parking
- Unauthorised parking
- Crossovers
- Inconsistent signs
- Parking enforcement

9.2. Parking at schools

9.2.1. **Drop off and pick up:** There are generally two types of parking issues that occur near schools. Firstly, the most acute and widespread parking issue for schools is during the busy period at the start and end of the school day. This is generally caused by parents choosing to drive pupils to and from school, and the limited space for parking around the school gates.

9.2.2. **Schools staff parking:** Secondly, as places of work, parking pressure near schools can sometimes be seen throughout the working day, and can often be due to school staff who commute to work.

9.3. Options

9.3.1. **School travel planning:** The Council has established mechanisms in place to address travel issues in and around schools. Through the Council's transport strategy, the Local Implementation Plan, the Council works with schools to establish School Travel Plans, which aim to reduce the dependence on the private car for all school related journeys.

9.3.2. **CPZ policy:** Typically CPZs are not used to control school drop off and pick up. Naturally, these problems tend to impact for short periods of time. In CPZ bays, vehicles are permitted to drop-off and pick-up passengers, and as such a CPZ would be largely ineffective.

9.3.3. However, the parking policy on CPZs is in place to help residents and businesses who find it difficult to access their homes or place of work. The policy is therefore applicable to this similar issue where it occurs around schools. CPZs could therefore be established near schools, but would be subject to the same constraints and consultation processes as other CPZ areas in and around places of work.

9.4. Consultation and feedback

9.4.1. Parking problems outside schools were raised as an issue by the Lee Green Assembly in their report to Mayor and Cabinet in April 2012.

9.4.2. In the public survey respondents were asked to indicate the main locations where they thought parking controls were needed. Schools were the second most popular location for parking controls.

9.4.3. At the stakeholder events the issue of parking around schools was raised as an issue. Attendees were concerned about teachers parking in surrounding roads during the day in term-time as well as parents dropping-off and picking-up their children. Attendees felt that during the afternoon collection

times, parking controls around schools should be more regularly and consistently enforced.

9.5. Conclusions

- 9.5.1. School Travel Plans aim to identify issues around access and road safety, and seek practical measures to influence travel behaviour.
- 9.5.2. As for any organisation, schools have a responsibility to consider the appropriate provision of parking capacity, and, through the School Travel Planning process, share a commitment to encouraging safe and sustainable travel for their staff and pupils.

9.6. Recommendation

34 Continue to work with schools to develop School Travel Plans to encouraging safe and sustainable travel for their staff, pupils and parents.

9.7. Other permits and concessions

- 9.7.1. In addition to the standard parking permits for residents, businesses, visitors and carers, there are a number of non-standard permits and concessions that may be applicable within CPZs.
- 9.7.2. **Charity permits:** A concession to the business permit rate will be granted for nationally registered Charities who are in receipt of a Council grant. The Charity will be able to purchase a permit at the resident permit rate provided the vehicle(s) is registered to the Charity and that the Charity's operating business is located within the boundary of the CPZ.
- 9.7.3. **Council staff permits:** Since 2011, Lewisham staff permits have fallen within the guidelines and permit charge rules for business permits.
- 9.7.4. **Z permits:** The 'Z' permit allows the holder to park in any on-street designated permit bay and it is not restricted to a particular CPZ, but can be used in all zones, unlike the business permit which is only valid for the zone in which the business is located. These permits are also valid in the council's car parks and are useful for businesses that have a number of branches or outlets across the borough. The permit allows the user the freedom to move between zones. The charge of £750, for Z permits, will remain unchanged.
- 9.7.5. **Special events and dispensations:** The policy document will set out the specific parking issues surrounding special events and dispensations such as weddings, funeral, fireworks displays, the London Marathon, People's Day, etc.
- 9.7.6. **Health Trust permits:** These permits are used by district nurses, health visitors, chiropodists and members of the adult therapy team amongst others during their working hours. The permits are administered by the hospital and are only made available to those members of staff working for the Health Trust for whom it is necessary to park in CPZs for a significant amount of their working week. The review has considered these permits and the current arrangements will remain unchanged.

- 9.7.7. **Lewisham Hospital staff permits:** Lewisham hospital has a limited number of on-site parking spaces. Lewisham Hospital are issued with a limited number of business permits to park in the CPZs surrounding the hospital. The number allocated to the hospital was derived where under utilised space was identified in the surrounding CPZs. These hospital staff permits are charged at the full business permit rate. The review has considered these permits and the current arrangements will remain unchanged.
- 9.7.8. **Lawn Bowls permits:** In order to support other Council policies such as promoting healthy lifestyles it was agreed to introduce a lawn bowling permit where under utilised parking space is identified. The permits are valid mid-April until mid-October (bowling season), a six month period. These permits are charged as a six month resident permit rate, are not valid for resident permit bays, but are valid for dual purpose bays. The bowling club will be responsible for promoting car sharing amongst members and visiting clubs whenever possible. The review has considered these permits and the current arrangements will remain unchanged.

9.8. Time Credits

- 9.8.1. Lewisham Council is working in partnership with the charity Spice to create a Time Credits Network for the Borough. Individuals can earn time credits by giving their time to support the local community, such as helping out at a local community organisation. Time credits can then be spent to access services and activities from other Time Network organisations.
- 9.8.2. In principle this review supports the spending of time credits to purchase visitor parking permits. The details of implementing this, were delegated to Executive Directors at Mayor and Cabinet on 16 January 2013.

9.9. Payment methods

- 9.9.1. The consultation demonstrated a strong desire to retain the use of cash for Pay and Display parking. However, mobile phone payment is already available in some areas of the Borough, and is a growing trend across the country.
- 9.9.2. **Pay and Display:** In light of new technologies and the commitment to drive efficiencies in the delivery of our parking service, it is proposed not to implement on-street Pay and Display machines for new or reviewed CPZs. This will enable the Council to phase out the provision of Pay and Display machines and to introduce more efficient ways of taking payment for parking charges.
- 9.9.3. Pay and Display machines pose significant contractual costs to the Council and they are expensive to purchase and maintain, with an ageing infrastructure these costs will certainly increase. Additional costs are attributed via cash collection, ticket rolls, ink pads and electrical battery back-up functions.
- 9.9.4. Pay and Display machines are an unsustainable and uneconomical way of taking payment for parking charges, they provide a target for on street

vandalism and theft which results in lost revenue and repair costs for the council. They also do nothing to enhance the street environment.

9.9.5. For the reasons set out above the Council should implement cashless parking as soon as possible. It is recognised that the introduction of cashless parking will be introduced alongside alternative ways of taking payment as a replacement for Pay and Display machines. The alternatives must consider payment provision for those customers who do not have access to a mobile phone or credit/debit card.

9.9.6. The Council will continue to review the provision of new and innovative payment methods as technology evolves.

9.10. **Recommendation**

35 Pay and Display machines to be phased out over-time in favour of more cost effective and cashless parking alongside alternatives for people who do not have access to a mobile phone or a credit/debit card.

9.11. **Supporting parking policy through the planning process**

9.11.1. The Council works with developers to ensure that parking provision in and around new developments is appropriate to the local area and supportive of the sustainable transport agenda.

9.11.2. Through the planning process, developers are encouraged, and where necessary, required to provide an appropriate amount of parking. Depending on the location, this can mean ensuring enough spaces are provided in residential or commercial developments to ensure that on-street parking does not increase in the vicinity.

9.11.3. This may also mean restricting the provision of parking, to discourage an unsustainable level of car ownership in the borough. This may apply in areas where demand for parking is very high, where public transport accessibility levels are very high, or where the development will be reliant on main roads that are already nearing their capacity.

9.11.4. In such areas, it may be appropriate to restrict parking levels to less than 1 space per dwelling. New dwellings which do not have space to park a vehicle are often referred to as “car-free developments”.

9.11.5. Car-free developments often appear in CPZs, or in areas with acute parking pressure. It is therefore important that the transport and planning policies that lead to these developments are supported by parking policy. Therefore, car-free developments are excluded from the CPZ permit application process.

9.11.6. As well as determining the most appropriate level of parking, the Council aims to support the delivery of sustainable developments by securing improvements through the planning process. This includes the provision of car clubs and electric vehicle charging points.

9.12. Specific-use bays

- 9.12.1. Parking bays often need to be reserved for specific activities or groups of people. The most common examples are Disabled bays, which have been discussed in some detail in section 8.25 of this report.
- 9.12.2. **Loading Bays:** Loading bays are often required to assist local businesses to take delivery of their goods in areas where space is limited. Loading bays are located near to business premises and can be time-limited. They are implemented specifically to facilitate loading, and not to provide space for parking.
- 9.12.3. **Doctors' Bays:** Doctors' bays are not usually necessary within CPZs, as the implementation of controls tends to address local parking problems making it much easier to park. However, an application may be considered under certain circumstances where doctors are required to make regular journeys, and where local parking pressure in the CPZ remains particularly acute.
- 9.12.4. Outside a CPZ a concessionary parking bay will be considered if it is felt necessary. These bays are not covered with a Traffic Management Order and can be utilised by other vehicles.
- 9.12.5. **Coach bays:** Coach or bus bays may be required under very specific circumstances to facilitate picking-up and dropping-off passengers. However, it would generally be expected that any new activity of this nature, particularly where undertaken by private companies, would be considered in advance, and catered for off the public highway.
- 9.12.6. All such specific-use bays would require an assessment to identify whether they are necessary, safe and feasible, before being considered for implementation. In general, the applicant would be required to cover the cost of the assessment, implementation works and the associated Traffic Management Order.

9.13. Electric cars

- 9.13.1. The increased use of electric cars in the borough will help reduce overall emissions from vehicles and therefore lower air pollution levels.
- 9.13.2. The Council have a number of vehicle charging points at various places in the borough. At the present time the use of the charging points is relatively low. However, as model numbers and production levels increase, prices may be expected to get lower which would result in increased electric vehicle sales and a corresponding demand for charging facilities
- 9.13.3. Where funding is available to introduce charging points, their implementation will consider the likely demand and suitable locations that seek to serve the wider community.
- 9.13.4. The Council also supports the use of electric (and other low emission) vehicles by the new proposed low cost resident permits available for Band A and B cars where they are the first or only car in a household in a CPZ to acquire a permit.

9.14. Recommendation

36 Where funding is available, new charging points for electric vehicles will be placed in locations that seek to serve the wider community.

9.15. Car Pools and Car Clubs

- 9.15.1. Car pools are usually informal arrangements operated by organisations or large employers, who offer flexible use of a vehicle to their staff or visitors. Car pools can help support those who choose not to own a private vehicle, or choose not to commute to work by car, and so help to reduce parking pressure around popular attractors.
- 9.15.2. The Council is supportive of car pools operating in the borough, and works with developers through the planning process to encourage car pools as part of a wider package of travel planning measures.
- 9.15.3. Car Clubs are usually operated by companies who aim to provide a network of cars in an area, and provide their members with access to a vehicle on a pay-as-you-go basis. The Council is supportive of car clubs, which are in alignment with our sustainable transport objectives. The Council has introduced a number of car club parking bays in CPZs to encourage the use within the locality and reduce car ownership.
- 9.15.4. One of the factors in establishing a successful car club is the need for a critical mass of car club vehicles spread across the area. It is therefore often beneficial to have a single operator working in an area. In Lewisham, Zipcar operate 64 car club bays across the borough.
- 9.15.5. When CPZs are introduced, specific car club bays are considered where residents are in support of introducing a car club facility. As car clubs are usually private companies, car club vehicles using their designated bays in a CPZ are required to display a business permit charged at the usual rate.

9.16. Motorcycles

- 9.16.1. Motorcycles are permitted to park free of charge in CPZs, provided they park perpendicular to the kerb. From a policy perspective, this reflects the smaller amount of kerb-side space required by motorcycles. However, this also reflects the practical difficulties, such as securely displaying a permit.

9.17. Footway parking

- 9.17.1. In Lewisham, as with other London Boroughs, it is an offence under the provisions of the Greater London Council (General Powers) Act of 1974 to park a vehicle wholly or partly on the footway and contravention is subject to a fixed penalty charge. However, at some locations it is reasonable to allow parking on the footway, for example in streets with very wide pavements (at least 3.6m) and narrow roads (less than 10.2m) where parking wholly in the carriageway would impede passing traffic.

9.17.2. The Council has in place a prescribed procedure to apply to applications for footway parking exemptions, incorporating survey, suitability against set criteria and public consultation.

9.18. Unauthorised off-street parking

9.18.1. There are regulations that govern the conversion of private gardens and forecourts into parking spaces. Planning consent is needed, and may require the permission of other bodies such as Transport for London.

9.18.2. If a person needs to drive across the pavement to get their vehicle into their driveway, then they must, by law, have a crossover constructed.

9.18.3. Unauthorised parking spaces of this nature are therefore not enforced in the same way as other parking contraventions (i.e. Civil Parking Enforcement), but using other legislative frameworks.

9.19. Crossovers

9.19.1. The Highways Act enables the Council to construct a vehicular crossover to enable access to private driveways or parking places. Due to administrative costs, there is a charge for applications. This application fee is non-refundable, but will be deducted from the final total, if the crossover is constructed.

9.19.2. Requests for bar markings (a white line in front of a dropped crossing indicating where people should not park) have steadily increased over the last few years. A standard charge is made for the installation of these markings, which includes an inspection fee and the contractors fees for implementing the marking.

9.20. Inconsistent signs

9.20.1. Inconsistent or unclear signs can cause confusion to drivers, and can undermine the enforcement of restrictions required to alleviate parking problems. During the reviews of existing CPZs and the implementation of new CPZs all signs will be reviewed to ensure they are consistent and clear.

9.21. Recommendation

37 All signs within existing CPZs will be reviewed as part of the review programme to ensure they are consistent and clear.

10. Next Steps

10.1. Write the new parking policy

10.2. Agree priority areas for review

10.3. Develop the rolling review programme for the coming year

10.4. Determine an implementation plan and rules for the changes outlined in this report

11. Legal implications

- 11.1. Whilst there are no direct legal implications arising from this report, the policy review will need to be compliant with appropriate legislation and any decision to implement the measures suggested in this report will need to be taken in the light of the relevant legal powers. The following paragraphs in this section of the report identify the legal powers that will be relevant.
- 11.2. The Road Traffic Regulation Act 1984 gives the Council powers to provide and regulate parking, both on the highway and in off-street car parks, including the charging of fees. In exercising this power, section 122 of the Act imposes a duty on the Council to have regard (so far as practicable having regard to the matters specified in subsection (2) to secure the 'expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway'. The matters specified in subsection (2) include amongst other things the desirability of securing and maintaining reasonable access to the premises and the effect on the amenities of any locality affected.
- 11.3. The procedures for making such orders and the form that they should take are set out in the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. These Regulations also deal with the procedure for varying existing orders and what publicity and consultation, if any is required. The requirements for publicity and consultation set out in the regulations would be carried out as part of the order making process and in addition to any consultation of a voluntary nature as described in the body of this report and which may form part of the Council's policy. Therefore the Council will be under an obligation to consider all representations made to it as part of the statutory consultation exercise, and take a decision based on the particular circumstances before it, which may involve deviating from adopted Council policy in individual cases.
- 11.4. The Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (England) Regulations require traffic regulation orders to include an exemption from waiting prohibitions in certain circumstances, and from charges and time-limits at places where vehicles may park or wait, in respect of vehicles displaying a disabled person's badge.
- 11.5. Section 55 of the Act requires an enforcement authority, (of which Lewisham is one), which is a London authority shall keep an account of—
- their income and expenditure under this Part of this Act in respect of designated parking places;
 - their income and expenditure as an enforcement authority in relation to parking contraventions within [paragraph 2 of Schedule 7](#) to the 2004 Act (parking places); and
 - their income and expenditure as an enforcement authority in relation to parking contraventions within [paragraph 3](#) of that Schedule (other parking matters).
- 11.6. At the end of each financial year any deficit in the account has to be made good out of the general rate fund. Any surplus has to be applied for all or any of the purposes

specified in the Act (e.g. for the purposes of a highway or road improvement project). So far as it is not so applied it has to be appropriated to the carrying out of some specific project falling within those purposes and carried forward until applied to carrying it out. Alternatively any amount not applied in any financial year may be carried forward to the next financial year.

- 11.7. Every London Borough also has to report at the end of the financial year to the Mayor of London on any action taken by them specified above in relation to any deficit or surplus in their account for the year.
- 11.8. The Equality Act 2010 (the Act) brings together all previous equality legislation in England, Scotland and Wales. The Act includes a new Public Sector Equality Duty (the duty), replacing the separate duties relating to race, disability and gender equality. The duty came into force on 5 April 2011.
- 11.9. The duty consists of the 'general equality duty' which is the overarching requirement or substance of the duty, and the 'specific duties' which are intended to help performance of the general equality duty.
- 11.10. The duty covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.11. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
 - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.

These are often referred to as the three aims of the general equality duty.

- 11.12. As was the case for the original separate duties, the new duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 11.13. The Equality and Human Rights Commission (EHRC) have issued technical guidance for public authorities in England on the Public Sector Equality Duty. The guidance can be found at <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>. This Guidance provides practical approaches to complying with the Public Sector Equality Duty. The EHRC technical guidance is not a statutory Code, but may be used as evidence in legal proceedings to demonstrate compliance with the Public Sector Equality Duty.

12. Financial background and implications

12.1. Income generated from parking services

12.1.1. In 2012/13, the Council has budgeted to receive £8.4m in income generated from parking services. Current projections suggest that this will be achieved by the end of the financial year.

12.1.2. In 2011/12, the Council collected £7.8m income in respect of parking services. This can be broken down as follows:

Total on-street and off-street income collected in 2011/12		
	£000s	%
Parking fines	3,075	39.5
Pay and Display	2,696	34.7
Permits	1,873	24.1
Commercial Rents	102	1.3
Advertising and other income	31	0.4
Total income 2011/12	7,777	100

12.1.3. It can be seen from the table above that income from permits accounts for 24% of the total income for parking services.

12.2. Expenditure relating to parking management

12.2.1. In 2012/13, the budgeted cost to the Council of managing parking services is £2.7m. The extension of the parking contract, to avoid re-letting during the Olympics, has resulted in a current projected overspend of £0.5m.

12.2.2. The actual cost of running the parking service in 2011/12 was £3.3m. This can be broken down as follows:

Parking management expenditure	
	£000s
Enforcement contract costs	1,841
Management and admin costs	612
Car park utilities, rates, repairs and maintenance	603
Legal fees	277
Total expenditure 2011/12	3,333

12.3. Parking control account

12.3.1. Under the Road Traffic Regulation Act, 1984 the Council is required to maintain a separate account of its on-street parking business activities and to report the outcome and the use made of any surplus generated annually to the Mayor of London. The account must contain all expenditure and income in relation to the provision, management and enforcement of on-street parking in the Borough.

12.3.2. The use of any surplus is governed by Section 55 of the Act which specifies that the surplus may be used for:-

- making good to the General Fund for any deficits incurred in the On-Street Parking Account during the previous four years; or
- meeting the cost of the provision and maintenance of off-street car parking in the Borough, or in another Local Authority.

12.3.3. If, however, it is considered unnecessary or undesirable to provide further off-street parking in this area, the surplus may then be used to fund any of the following:-

- public passenger transport services;
- highway improvement works;
- highway maintenance; or
- the costs of anything that has the approval of the Mayor of London and which facilitates the implementation of the Mayor's transport strategy.

12.3.4. The Council's Parking Control Account for 2011/12 is summarised below:

Borough Parking Control Account 2011/12		
	£000s	%
On-street Parking income		
Pay and Display	1,523	30.3
Permits	1,374	27.3
Fines	2,134	42.4
	5,031	100
On-Street Parking expenditure		
Enforcement contract costs	1,645	63.6
Management, admin and running costs	704	27.2
Legal fees	237	9.2
	2,586	100
Funds available for supporting highways	2,445	

12.3.5. The available funds shown in the above table were applied to highways maintenance and improvements which totalled £4.9m in 2011/12. The table below shows a breakdown of that spend.

Highways maintenance and improvement expenditure 2011/12	£000s
Major works – Capital repayments from revenue	1,586
Structural maintenance (incl. patching, footways, markings, drainage)	951
Safety maintenance (incl. signage, marking, signals etc)	760
Routine repairs	467
Street lighting	960
Winter maintenance	137
Total expenditure	4,861

12.4. Summary

- 12.4.1. It can be seen from the table in Section 12.1 above that income from permits accounts for 24% of the total income for parking services and 27% of on-street parking income.
- 12.4.2. Proportionally, on-street parking income funded approximately 50% of the Council's spend on highways maintenance and improvements in 2011/12, although it can be seen from the above that income from Pay and Display and Permits mostly cover the cost of managing and enforcing parking services.

12.5. Implications

- 12.5.1. The consultation process incurred a cost of £11,000 for temporary staff, printing and postage, all of which was contained within existing budgets.
- 12.5.2. There are many variables to consider when forecasting parking related revenue. Parking behaviour and personal choices can be significantly affected by policy changes and indeed by wider social and economic circumstances.
- 12.5.3. As part of the policy review, a modelling exercise has been undertaken to test the possible implications of different policy choices.
- 12.5.4. The proposals relating to income arising from the review are intended to offer a fairer method of charging without impacting detrimentally on the council's financial position. Within the overall parking budget, the proposals broadly achieve that aim, albeit with small but manageable risks.
- 12.5.5. Whilst it is recognized that new CPZs will generate additional income, the financing of the costs of implementation, and abortive costs on those schemes that do not proceed, will need to be considered as a part of the council's overall financial strategy.
- 12.5.6. A breakdown of the impact of the summary list of recommendations, at the front of this report, on the parking finances outlined above is contained in Appendix I.

13. Equalities implications

- 13.1. Compliance with the Equality Duty, as described in the 'Legal Implications' of this report has been incorporated within a more detailed Equalities Analysis Assessment which can be found in Appendix E.
- 13.2. In summary the changes being proposed as part of the Parking Policy Review have a predominantly positive or neutral impact on the protected characteristics as set out in the Equality Act 2010. Of the 37 recommendations in this report, 19 (51%) have been assessed as having a positive impact on equalities, 2 (6%) have been assessed as negative, and 16 (43%) as having a neutral impact on equalities.
- 13.3. Although parking policy will affect all residents, businesses and visitors in the borough, the specifics of some of the recommendations being proposed as part of this report, will impact on some protected characteristics more significantly than others, namely Age, Disability, and Pregnancy and Maternity. Recommendations in

the report have been driven by consultation responses (analysed by protected characteristics) and engagement with key stakeholders that represent the interests of particular protected characteristics such as Age and Disability.

13.4. Key positive equalities impacts on Age, Disability, Pregnancy and Maternity as a result of these parking policy recommendations include:

- reduced costs for pensioners and low-income households through the provision of cheaper resident parking permits, free carer parking permits and cheaper weekly visitor parking permits;
- continued provision of resident parking permits free of charge to Blue Badge holders;
- easier accommodation of visitor parking to those that are isolated, vulnerable, pregnant or new families through the provision of cheaper weekly visitor permits, a selection of free visitor permits concessions to those who are eligible (including older residents in low-income households), and reduced hours of operation in appropriate CPZs;
- quicker resolution of parking issues, that prevent people with mobility issues or young families, parking close to their homes, and create neighbourhood tensions;
- transparent criteria and application process for new mandatory and advisory disabled parking bays, and an annual programme of review to manage and fund these requests.

13.5. Although no overly negative equalities impacts on protected characteristics were identified as a result of the changes proposed within this report, further analysis on the impact of additional parking permits charges for those households with more than one vehicle will need to be undertaken on younger residents (i.e. 18-24 years). Survey results indicated that this age grouping was most opposed to this charging model, and will be disproportionately impacted. However, this analysis is based on a small survey sample size, and is not borne out through additional analysis of the 2001 Census results. This will need to be re-analysed once the 2011 Census data becomes available.

13.6. Moving forward, the Council will also need to give greater consideration to the accessibility of its engagement processes with local areas on proposed new parking restrictions. These need to allow sufficient time for full participation by all members of the community and aim to increase voter turnout through the provision of information in alternative formats as necessary.

13.7. The Council will also need to ensure that any move away from the use of Pay and Display machines is accompanied by an appropriate communications campaign. This should clearly set out the alternative payment methods available, and reassure residents or visitors that do not have access to the Internet, a mobile phone or credit/debit card, that they still have legitimate payment options, that allow them to park safely and conveniently in Lewisham. Consideration should also be given to those who might be vulnerable from a personal safety perspective, particularly in parking locations that are poorly lit or isolated – i.e. if they are required to use their mobile phone or credit/debit cards in public view. The provision of additional payment options as technology evolves must also be considered in terms of accessibility for the user, to prevent indirect discrimination from occurring. For example, alternatives such as top-up cards, should consider the proximity and hours of operation of the nearest PayPoint location in relation to the on-street parking bays. This may be very significant for service users with mobility issues.

13.8. The Council also needs to ensure that any web-centric parking policies make alternative provision for those without the Internet, to ensure equitable provision of the service.

14. Crime and disorder implications

14.1. There are no direct crime and disorder implications arising from this report.

15. Environmental implications

15.1. There are no direct implications arising from this report, but the policy review will take into account the Council's broader ambitions for environmental sustainability. For instance, its Local Implementation Plan aims to reduce growth in road traffic through the discouragement of car usage and the promotion of facilities for cyclists and pedestrians and alternative sustainable methods of transport. The limitation of on-street parking through CPZs, especially around shopping centres and transport hubs is considered to be a deterrent to car usage.

15.2. The resulting policy will also need to consider commitments made following the Strategic Environmental Assessment carried out as part of the Transport for London, Lewisham Local Implementation Plan which was finalised in March 2011.

16. Background Document and Report Author

16.1. There are three background documents to this report:

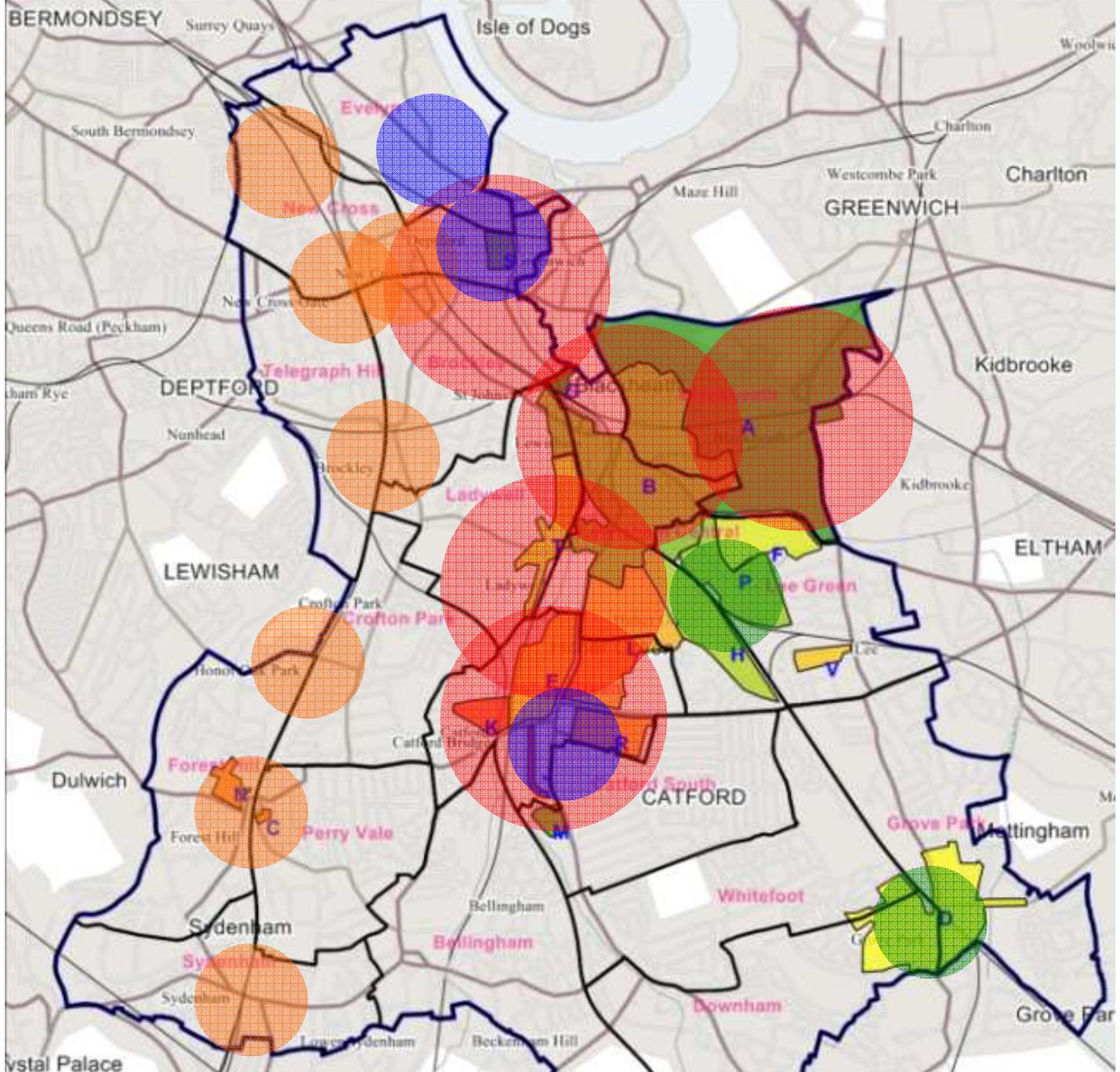
- Lee Green parking working group - final report dated February 12 available at this link: http://lewisham-consult.objective.co.uk/portal/regeneration/t/parking_policy_review
- A SDSC report that went to the meeting on 1 Nov 2012. http://lewisham-consult.objective.co.uk/portal/regeneration/t/parking_policy_review
- A SDSC report that went to the meeting in May 2012 outlining the scope and timings of the review by this link <http://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CIId=136&MIId=2381&Ver=4>

16.2 If you require any further information about this report please contact Ralph Wilkinson on 020 8314 6040.

A BLACKHEATH CPZ
 B LEWISHAM CPZ
 C HINDSLEY'S PLACE CPZ
 D GROVE PARK CPZ
 E RUSHEY GREEN WEST CPZ
 F OLD ROAD & BANKWELL ROAD CPZ
 G ELVERSON ROAD CPZ
 H HITHER GREEN WEST CPZ

J CANADIAN AVENUE CPZ
 K CATFORD WEST CPZ
 L RUSHEY GREEN EAST CPZ
 M BARMESTON ROAD CPZ
 N DAVID'S ROAD CPZ
 P HITHER GREEN EAST CPZ
 R RUSHEY GREEN SOUTH CPZ
 S DEPTFORD TOWN CENTRE

T LADYWELL CPZ
 V LEE CPZ
 BOROUGH BOUNDARY
 WARDS



-  All-day attractors: Major Urban and District Centres and hospitals - 800m walking radius
-  Commuter attractors: East London Line Stations - 400m walking radius
-  Commuter attractors: Existing stations with CPZs - 400m walking radius
-  Future attractors: Potential CPZs required to support new developments