



Mayor and Cabinet

Report title: Proposed New parking arrangements
on Housing Estate land

Date: 14 July 2021

Key decision: Yes

Class: Part 1

Ward(s) affected: All

Contributors: Executive Director for Housing, Regeneration and Public Realm, Director of Corporate Resources, Director of Law, Governance & HR

Outline and recommendations

This report seeks to gain approval in principle to implement new parking enforcement arrangements on LBL managed Housing Estates using TMOs (Traffic Management Orders) in keeping with the requirements of the Road Traffic Regulation Act 1984.

It is recommended that the Mayor and Cabinet:

- Note the review underway of parking arrangements on Council owned Housing Estates, and approve in principle the introduction of TMO's (Traffic Management Orders) for the purpose of managing and enforcing parking on housing land, including existing Housing Estate parking sites and additional new sites where new build developments are being constructed by Lewisham Homes.
- Delegate authority to the Executive Director of Housing, Regeneration and the Public Realm to agree the draft scheme designs as set out at paragraph 5.6 of this report,
- Agree to carry out statutory consultation with secure tenants under Section 105 of the Housing Act 1985 and non-statutory consultation with leaseholders regarding the proposed changes, with the results of that consultation to be reported back to Mayor & Cabinet for consideration prior to a final decision on the introduction of TMO's being made.
- Subject to the changes going ahead, agree to the principle of a review of the parking charges for current housing sites within the first year of implementation of the new parking arrangements, the results of which will then be reported to a future meeting of Mayor and Cabinet to sign off the review and agree the recommendations for a new charging structure.

Timeline of engagement and decision-making

N/A

1. Summary

- 1.1. There are currently 30 parking sites on Lewisham Homes managed estates and 3 on Regenter B3, Brockley PFI managed estates. The first controlled parking measures were introduced on Housing Estates in 1998 and demand for parking controlled sites has risen significantly over the years with requests usually being resident-led. The control of parking on Estates ensures a fair and managed parking system for the residents, and helps to reduce congestion, allow emergency services easy access to the site and improve health and safety.
- 1.2. Historically, Lewisham Homes and Regenter B3 have engaged external parking enforcement companies to enforce parking on estates. Due to the increasing parking pressures on our Housing Estates and the increasing demand for new controlled sites, a comprehensive review of the current parking enforcement approach on council-owned housing estates has been conducted. As a result of this review, the Council is recommending the introduction of Traffic Management Orders (TMOs) to enforce parking restrictions on housing estates where enforced parking is required.
- 1.3. The aim of this proposal is to enable residents to park close to their home by restricting the availability of spaces to other road users and only allowing permit holders to utilise the parking provision. As part of the proposed introduction of TMOs, an assessment of the estate parking arrangements will include options to include new facilities on housing estate sites, including the provision of cycle hangers and electrical charge points.
- 1.4. The proposed approach will include a resident engagement and consultation phase. At this time, residents will be able to see the proposed parking schemes for their estate, and will have an opportunity through the consultation process to feed into the review.
- 1.5. If agreed, the introduction of TMOs for housing estates would bring arrangements for housing estate land in alignment with all other parking arrangements in the Borough, ensuring a consistent approach to parking enforcement for all residents. The proposed approach is also in line with what other Authorities have already approved and instigated to manage parking on their housing estates within their Boroughs.
- 1.6. All parking and enforcement would be managed by the Council's parking team. This would provide a consistent approach in service delivery for residents across the Borough, regardless of where they live.
- 1.7. For those residents using the current 33 sites, it is proposed not to increase permit costs in the first year after introduction of the new arrangements. It is proposed that a

review of the parking charges would be undertaken within the first year following implementation of the new arrangements. This review would consider current parking charges and put forward proposals for annual incremental increases that will, over time, bring parking charges on housing estates in line with what all other residents in the Borough pay.

- 1.8. All income generated from permit sales and enforcement will go into LBL's parking account in line with Section 55 of the Road Traffic Act.
- 1.9. Lewisham Homes as the Council's Development partner are currently leading a new build programme with build sites located on various Housing Estates. As part of the parking strategy new controlled parking sites will be needed on these Estates where none are currently in existence. Resident permit costs on new sites will be charged at the same rate, as outlined in section 6.

2. Recommendations

- 2.1. It is recommended that the Mayor and Cabinet:
 - 2.1.1. Note the review underway of parking arrangements on Council owned Housing Estates, and approve in principle the introduction of TMO's (Traffic Management Orders) for the purpose of managing and enforcing parking on housing land, including existing Housing Estate parking sites and additional new sites where new build developments are being constructed by Lewisham Homes.
 - 2.1.2. Delegate authority to the Executive Director of Housing, Regeneration and the Public Realm to agree the draft scheme designs as set out at paragraph 5.6 of this report.
 - 2.1.3. Agree to carry out statutory consultation with secure tenants under Section 105 of the Housing Act 1985 and non-statutory consultation with leaseholders regarding the proposed changes, with the results of that consultation to be reported back to Mayor & Cabinet for consideration prior to a final decision on the introduction of TMO's being made.
- 2.2. Subject to the changes going ahead, agree to the principle of a review of the parking charges for current housing sites within the first year of implementation of the new parking arrangements, the results of which will then be reported to a future meeting of Mayor and Cabinet to sign off the review and agree the recommendations for a new charging structure.

3. Policy Context

- 3.1. The London Mayor's Transport Strategy (MTS) was published in early 2018. The Council's own Transport Strategy and Local Implementation Plan 2019-41(LIP3) sets out how the Council intends to deliver the objectives of the MTS at a local level. This includes ambitions to increase the number of trips made by sustainable means, such as by walking, cycling or public transport. Further objectives include a reduction in traffic levels and car ownership, improved air quality and support for the delivery of new homes and jobs.
- 3.2. In line with the Council's Strategic objectives, this report supports the following priorities in the 2018-2022 Community Strategy:
 - Building an inclusive local economy – Everyone can access high quality job opportunities, with decent pay and security in our thriving and inclusive local economy
 - Delivering and defending: Health, Social Care and Support – Ensuring everyone receives the health, mental health, social care and support services they need

- Making Lewisham Greener – Everyone enjoys our green spaces and benefits from a healthy environment as we work to protect and improve our local environment
- Building Safer Communities - Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

4. Background

- 4.1. Thirty-three Lewisham Council owned housing estates currently have parking enforcement measures in place across estates managed by Lewisham Homes and Regenter B3. These enforcement measures have been introduced over time as a result of resident demand and housing management requirements for estates where parking control has been an issue.
- 4.2. The demand for parking control measures is increasing with residents leading on requests for new sites. In 2015, there were 19 sites, and this number has now increased to 33. The full list of estates with current parking enforcement can be found in section Appendix A.
- 4.3. Resident requests are usually as a result of non-residents parking within the estate. This is a particular problem on Housing Estates located near railway stations, hospitals and shopping centres. It is anticipated that demand for the introduction of new sites on Housing Estates will continue to increase, including on estates where Lewisham Homes are developing new build sites.
- 4.4. The current parking control measures allow residents living within the estate boundary to park there, providing they display a valid parking permit. The issuing of permits is managed by Lewisham Homes and Regenter B3. This is currently managed under a contract law arrangement with a private enforcement company, who issue non-statutory parking notices to vehicles without permits.
- 4.5. Following legislation introduced in the Protection of Freedoms Act 2012 relating to parking enforcement, which banned wheel-clamping, many landowners changed to issuing non-statutory 'parking notices', and used the powers given to them to request a vehicle's registered keeper details from the DVLA to pursue these notices.
- 4.6. However, since 2014, Local Authorities have been put under further pressure by central government to stop using contract law to enforce parking restrictions on Council Housing Estates. Instead, they have been encouraged to use the statutory powers available to them under the Road Traffic Regulation Act 1984 via the Traffic Management Orders process, which allow for the issuing of statutory Penalty Charge Notices (PCNs) for non-compliant parking.
- 4.7. To encourage Local Authorities to comply, since 2016, the DVLA no longer provides registered keeper details of offending vehicles to enforcement companies operating on behalf of Local Authorities under contract law. In effect, this means that if the Council does not hold the vehicle owner's details and continues enforcing under the current contract law approach, the Council has no means of locating the vehicle owner and enforcing the penalty charge.
- 4.8. As a result of this, the issuing of non-statutory parking notices under contract law has ceased to be an effective method of parking enforcement, and the Council can no longer recover the penalty charges successfully. This together with other enforcement issues relating to the status of land on estates, has affected and in some instances prevented the Council's ability to effectively enforce and will continue to do so unless changes are made. It is therefore recommended that the Council introduces Traffic Management Orders to be enforced by Lewisham Council's parking enforcement contractor, in order to effectively manage parking within its Council-managed Housing

Estates.

- 4.9. Currently, on-street parking permits are charged based on a vehicle's emissions, with higher polluting vehicles paying the most for their permit, while lower polluting vehicles pay less. To align with all other permits issued in the borough, Housing Estate parking permits will also be based on emissions.
- 4.10. On 15 January 2020, the Mayor and Cabinet approved the introduction of emission-based on-street parking permits, which came into effect on 1 April 2020. Vehicles that have higher carbon emissions now pay more for their permit, while vehicles with lower carbon emissions pay less. A diesel surcharge also applies.
- 4.11. This was implemented to encourage the take-up of more sustainable forms of transport, such as walking, cycling or public transport, or to encourage the take-up of lower polluting and electric vehicles. Therefore, the introduction of emission-based Housing Estate parking permits aligns with the Council's wider parking policy.
- 4.12. Introducing emission-based Housing Estate parking permits also coincides with the actions within the Council's Air Quality Action Plan (2016-2021). The action plan states that 'road transport is the main source of air pollution in London', and that there needs to be 'a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible'.¹
- 4.13. The Air Quality Action Plan also states actions that should be taken by the parking department to contribute to the improvement of air quality in the borough. These include 'free or discounted parking permits for zero emission cars' and 'a surcharge on diesel vehicles below Euro 6 standards for Resident and Controlled Parking Zone permits'.² This has already been actioned for on-street parking permits, as of 1 April 2020, and introducing emission-based Housing Estate parking permits would bring these permits into alignment with all other permits issued throughout the borough.

5. Review of Parking arrangements of Housing Estates

- 5.1. A review of the current parking enforcement arrangements demonstrated a need to move away from the current method of enforcement and introduce Traffic Management Orders on the designated estates where parking enforcement is required.
- 5.2. In addition to the approach to enforcement, it is the case currently that parking permit costs are inconsistent between estates managed by the Council Arm's Length Management Organisation Lewisham Homes, and the estates managed by our Private Finance Initiative (PFI) Regenter B3.
- 5.3. The review will determine the specific requirements for each of the sites, to identify what measures will need to be put in place in preparation for the introduction of the new parking restrictions and move to the use of TMOs to enforce.
- 5.4. The Council have commissioned the services of Consultancy, Project Centre, to undertake the review and assist with the introduction of the new parking restrictions on its housing estates. Project Centre will lead the project from Design through to Implementation of the new enforcement measures.
- 5.5. It is proposed that the Project will be delivered in five phases:
 - Phase A – Survey & Design
 - Phase B – Tenant and Leaseholder Consultation

¹ [Lewisham Council Air Quality Action Plan \(2016-2021\)](#), page 3.

² [Lewisham Council Air Quality Action Plan \(2016-2021\)](#), page 34.

- Phase C – Final Design
- Phase D – Traffic Management Orders (TMOs)
- Phase E – Implementation

- 5.6. **Phase A Survey & Design** – A survey will be undertaken to confirm status of existing parking provision and confirm whether they are ‘on street’ or ‘off street’ classifications for TMO purposes. A draft scheme design will be produced for each of the sites which will have considered a range of options, including if the site should be a ‘permit holder only’ scheme, whether it can accommodate designated visitor parking, provision for loading and unloading, whether double yellow line markings are required, through to the installation of electric vehicle charging points. This process will also involve the production of the costings and a design showing locations of road markings and signs. The draft scheme designs will be considered by the Executive Director of Housing, Regeneration and Public Realm for sign off prior to any resident consultation taking place.
- 5.7. **Phase B Consultation with secure tenants and leaseholders** – S105 of the Housing Act 1985 requires the Council to consult with its secure tenants on matters of housing management, including changes in the provision of amenities, which includes parking management. Resident feedback on the proposed changes to the new parking restrictions will have to be received and considered prior to a decision being made by the Council to proceed with changing how it manages and enforces parking on its Housing Estates.
- 5.8. As part of the consultation process, secure tenants will be written to explaining the proposed changes. A plan of the draft scheme design relevant to their particular estate will be enclosed with their letter. Tenants can provide feedback through various means including a dedicated email address, a consultation web portal where residents can submit comments, and a pre-paid postal address and envelopes.
- 5.9. There is no statutory obligation to consult leaseholders, however it is proposed a non-statutory consultation also takes place with leaseholders on the same basis as for secure tenants in order that views from leaseholders can be taken into consideration.
- 5.10. The responses and feedback from the consultation process will be reported to a future meeting of Mayor and Cabinet for consideration and a decision whether to proceed with the final design and statutory TMO consultation phases.
- 5.11. **Phase C Final Design** – Any necessary changes will be made to the scheme proposals and once these are signed off by the Council, work will commence on preparation of the Traffic Management Orders (TMOs) for the statutory consultation process.
- 5.12. **Phase D Traffic Management Orders** – TMOs will be drafted under the appropriate section of the Road Traffic Regulation Act 1984 (dependent whether the location of the site is on- or off-street). Notices will also be drafted in preparation for the statutory consultation process.
- 5.13. Notices will be advertised in all of the relevant local newspapers. All correspondence received will be responded to and any objections will be considered.
- 5.14. Once the statutory TMO consultation closes, the Executive Director of Housing, Regeneration and the Public Realm, will make a decision on whether or not to progress the proposals and proceed with implementing the new scheme.
- 5.15. **Phase E Implementation** – If agreement to proceed is issued, work will commence on the individual sites to install the new signage and lines that are required in accordance with the plans and when the Traffic Management Orders are operational.

6. Permit pricing arrangements

- 6.1. In addition to the approach to enforcement, it is the case that currently parking permit costs are inconsistent between estates managed by the Council Arm's Length Management Organisation, Lewisham Homes, and the estates within the Brockley PFI managed by our Private Finance Initiative (PFI), Regenter B3. This inconsistency is due to the respective costs of enforcement by the contractors that have historically been used by Lewisham Homes and Regenter B3 to enforce.
- 6.2. If the changes go ahead, it is recommended that residents within the Lewisham Homes and Brockley PFI areas will not be subject to an increase in parking costs as a result of any introduction of new TMOs, and parking permit costs will not increase in the first year. Any new sites identified in connection with the delivery of new housing on existing estates and any future estates where parking enforcement is introduced will be subject to the same pricing arrangements.
- 6.3. It is also recommended that a review of the parking charges on existing sites would be undertaken within the first year after implementation of the new parking restrictions, to address the inconsistencies in permit costs, and with a view to introduce emission-based pricing for parking permits. This would also bring Housing Estates into line with all other permits issued throughout the borough, which are currently charged based on emissions.
- 6.4. The pricing mechanism for Housing Estate parking permits would be the same as on-street parking permits, in that lower polluting vehicles will pay less for their parking permit, and higher polluting vehicles will pay more. However, the actual pricing may be different, and will be informed by resident consultation.
- 6.5. Any further change in pricing would be subject to a full consultation with residents, and will include an assessment of the socio-economic impacts of any pricing structure for resident and visitor permits.
- 6.6. Subject to the TMOs proceeding, this report recommends that the Mayor and Cabinet agree in principle to a review of parking charges for the existing Housing Estate sites within the first year of implementation of the new parking arrangements, and agree to a pricing structure that would allow for parking costs to be increased annually on an incremental basis, to align to the wider borough parking strategy and climate emergency strategy. This will ensure a consistent approach to service delivery across the borough. The results of the review will be reported to a future meeting of Mayor and Cabinet to sign off the review and agree the recommendations for a new charging structure.
- 6.7. As mentioned in paragraph 1.8, all income from the sale of permits and income from revenue generated from the sale of permits is paid to the Council, in line with Section 55 of the Road Traffic Regulation Act 1984.

7. Financial implications

- 7.1. This report seeks Mayor & Cabinet approval for the introduction of TMO (Traffic Management Order) on all existing Council Housing Estate parking sites as well as new sites where new build developments are being constructed. It seeks further approval for delegated authority to the Executive Director of Housing, Regeneration and the Public Realm to sign off and approve the design, consultation and implementation phases of the project, agree to a review of parking charges for current sites and implement any recommendations for a new charging structure after the first year.
- 7.2. Charges and income related to the current system of parking on Council Housing estates is recognised within the Housing Revenue account. Parking permit income is

deposited into the account and used to off-set any charges incurred through the engagement of external parking enforcement companies to enforce parking on estates. Any excess income is carried forward for future use.

- 7.3. This report recommends that a review of the arrangements are undertaken with a view to introducing Traffic Management Orders on the estates to bring the system in line with the non-estate parking arrangements, after relevant consultation has been undertaken.
- 7.4. The design, review and consultation costs will be charged to the HRA. Current estimates for the total costs of the process vary but are likely to be in the region of £50k or more. A budget has not yet been identified to cover these costs, but a proportion will be able to be off-set against the current permit income. If this is not sufficient to meet this cost in 2021/22, it will cause a pressure within the HRA which will need to be off-set through other cost reductions, or additional income, else ware in the HRA.
- 7.5. Once the TMO orders have been put in place, all income generated from permit sales and enforcement will go into LBL's parking account in line with Section 55 of the Road Traffic Act.
- 7.6. The Parking Service anticipates that there will be no further costs to the Council, Lewisham Homes or Regenter B3 for the proposed and future arrangements for enforcement and the issuing permits detailed in this report, other than those already mentioned above. The Council has a contract with NSL and has fixed costs for any additional Enforcement Officers employed to enforce the estates. These costs will be offset by any income arising from the PCN's and permits issued.
- 7.7. It is difficult, at this time, to estimate the number of PCN's that will be issued, however the Parking Service will produce a financial report after a year of operation which will detail all the income realised along with the related expenditure.

8. Legal implications

- 8.1. The Road Traffic Regulation Act 1984 (RTRA) provides the powers for the Council to designate parking places on and off the highway and to charge for the use of them and includes the power to issue permits. The procedure requires consultation and a designation order.
- 8.2. Section 122 RTRA imposes a general duty on authorities to exercise functions under the Act (so far as practicable having regard to the matters set out at para 8.3 below) 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.
- 8.3. In fulfilling the general duty imposed by Section 122 RTRA, the matters referred to above are as follows:-
 - (a) The desirability of securing and maintaining reasonable access to premises;
 - (b) the effect on the amenities of any locality and the importance of regulating and restricting the use of roads by heavy commercial vehicles so as to preserve or improve the amenities of the areas through which the roads run;
 - (c) the national air quality strategy
 - (d) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - (e) any other matters appearing to the Council to be relevant.
- 8.4. The procedures for making traffic management orders and the form that they should take are set out within the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. This includes a statutory duty to consult.

- 8.5. The Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (England) Regulations 2000 require that orders made under the RTRA 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
- 8.6. The Traffic Management Act 2004 (TMA) is the primary legislation for the management of parking in England. It reinforces the legal duty under the RTRA to ensure the expeditious movement of traffic. Part 6 of the TMA affects parking and is accompanied by statutory and operational guidance documents. Councils are legally obliged to 'have regard to' the former, while the latter sets out the principles underlying good parking management and recommends how this can be achieved.
- 8.7. The main principles advocated in the TMA statutory guidance are:
- managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists), as required under the Traffic Management Act 2004 Network Management Duty
 - improving road safety
 - improving the local environment
 - improving the quality and accessibility of public transport
 - meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car
 - managing and reconciling the competing demands for kerb space.
- 8.8. Section 55 RTRA provides for the establishment of a separate account into which monies raised through the operation of parking must be paid. The Act requires an enforcement authority, (of which Lewisham is one), to keep an account of:-
- their income and expenditure 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).
- 8.9. It also deals with shortfalls and surpluses. Shortfalls must be made good from the General Fund, and subject to carry forward provisions, any surplus must be applied for the following purposes:-
- (a) the making good of shortfalls in the last 4 years
 - (b) the provision and maintenance of off street parking by the council or others
 - (c) if further off street parking appears unnecessary or undesirable then
 - (i) meeting the cost of provision, operation or facilities for public transport services; and
 - (ii) highway or road improvement projects in the area.
- 8.10. There are also provisions for carry forward. Every London Borough also has to report to the Mayor for London at the end of every financial year on any action taken in relation to any deficit or surplus on their account.
- 8.11. 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.
- 8.12. 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.

- 8.13. 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.
- 8.14. 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.
- 8.15. These are often referred to as the three aims of the general equality duty.
- 8.16. The duty is 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.
- 8.17. 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.

9. Equalities implications

- 9.1. The changes being proposed in this report do not affect the current pricing of parking permits for residents of the estates included in the proposed changes, so there is no financial change for residents in relation to the costs of parking on estates.
- 9.2. The changes being proposed in this report will amend the process of applying for a permit. Residents will apply directly to Lewisham Council, rather than as they currently do through Lewisham Homes. This change does not have any impact on particular groups or individuals. All changes in process will be communicated to all affected residents as well as Tenant and Resident Associations, ensuring that these communications are accessible.
- 9.3. A review of the parking charges is proposed within the first year of the scheme being operational. Any material or financial changes to the permits will include a full equalities impact assessment which will include an assessment of the socio-economic impacts of any proposed future permit pricing structure.

10. Climate change and environmental implications

- 10.1. The Council is legally required to work towards air quality objectives under the Environment Act 1995. Lewisham Council's Air Quality Action Plan (2016-2021) outlines how the Council will implement these objectives, and the proposed changes align with the Council's overall objectives.
- 10.2. The pricing for Housing Estate parking permits will be reviewed, as highlighted in paragraph 6.2, with the aim to charge for these permits based on a vehicle's emissions. Following the introduction of emission-based on-street parking permits in all

other locations, this pricing will harmonise charges for all permits issued throughout the borough.

- 10.3. Emission-based charging for permits allows the Council to monitor the emissions of all vehicles within the borough, to ensure that improving air quality remains a top priority. This also aligns with TfL's wider policy, with the introduction of the ULEZ in October 2021, and the Council's climate change agenda.
- 10.4. Therefore, the proposed permits are expected to have a positive impact on climate change and the environment, as all vehicles within Housing Estates will be charged to park based on emissions.

11. Crime and disorder implications

- 11.1. There are no crime and disorder implications directly arising from this report

12. Health and wellbeing implications

- 12.1. There are no health and wellbeing implications directly arising from this report.

13. Report author and contact

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14. Comments for and on behalf of the Executive Director for Corporate Resources

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15. Comments for and on behalf of the Director of Law, Governance and HR

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