

Traffic Management Advisory Committee Agenda



To: Councillor Stuart King (Chair)

Councillors Muhammad Ali, Jeet Bains, Felicity Flynn, Simon Hoar and Karen Jewitt

Reserve Members: Robert Canning, Luke Clancy, Mary Croos, Ian Parker, Pat Ryan and David Wood

A meeting of the **Traffic Management Advisory Committee** which you are hereby summoned to attend, will be held on **Wednesday, 24 July 2019** at **6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER
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www.croydon.gov.uk/meetings
Tuesday, 16 July 2019

Members of the public are welcome to attend this meeting.

If you require any assistance, please contact the person detailed above, on the righthand side.

N.B This meeting will be paperless. The agenda can be accessed online at www.croydon.gov.uk/meetings

AGENDA – PART A

1. Apologies for Absence

To receive any apologies for absence from any members of the Committee.

2. Minutes of the Previous Meeting (Pages 5 - 16)

To approve the minutes of the meeting held on 2 May 2019 as an accurate record.

3. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

4. Urgent Business (if any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Objections to Emission-Based Parking Permit Charges and Diesel Surcharges for Permits (Pages 17 - 84)

This report considers the objections to emission-based parking permit charges and diesel surcharges for permits.

6. Cecil Road and Aurelia Road - Results of Informal Consultation on the Proposed Change of Hours of an Existing Controlled Parking Zone (CPZ) (Pages 85 - 102)

This report considers the results of the informal consultation on the proposed change of restriction hours of an existing West Thornton CPZ (Controlled Parking Zone) in Cecil Road and Aurelia Road.

7. Lower Road Area - Results of Informal Consultation on the Proposed Introduction of a Controlled Parking Zone (CPZ) (Pages 103 - 118)

This report considers the results of the informal consultation on the proposal to introduce a Controlled Parking Zone to the currently unrestricted roads Lower Road, Little Roke Road and Little Roke Avenue.

8. South Croydon Area - Results of Informal Consultation on the Proposed Introduction of a Controlled Parking Zone (CPZ) (Pages 119 - 146)

This report considers the results of the informal consultation on the proposed introduction of a CPZ into the South Croydon Area which includes roads close to the existing Croydon CPZ (West and South Permit Zones), Bynes Road CPZ and Napier Road CPZ.

9. Outcome of Formal Consultation on School Streets (Pages 147 - 176)

This report considers the objections and responses from the consultation on the Public Notice of 23 May 2019 on School Streets.

10. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

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Public Document Pack Agenda Item 2

Traffic Management Advisory Committee

Meeting of held on Thursday, 2 May 2019 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Stuart King (Chair);

Councillors Muhammad Ali, Chris Clark, Simon Hoar and Karen Jewitt and Vidhi Mohan

Also Present: Councillor Leila Ben-Hassel

Apologies: Councillor Jeet Bains

PART A

1/19 **Minutes of the Previous Meeting**

The minutes of the meeting held on 5 February 2019 were agreed as an accurate record.

2/19 **Apologies for Absence**

Apologies were received from Councillor Bains; Councillor Mohan was present in substitution.

Apologies for lateness had been received by Councillor Jewitt.

3/19 **Disclosure of Interests**

The Chair declared a non-pecuniary interest in Item 10 – School Streets. He noted that his children attended Regina Coeli Catholic Primary School; however, he remained of a neutral mind and would take part in the consideration and vote on the recommendations. Following legal advice previously sought, Councillor Ali agreed to take the Chair if there was discussion regarding Regina Coeli Catholic Primary School.

4/19 **Urgent Business (if any)**

There were no items of urgent business.

Boston Road / Keston Road / Broughton Road Area - Results of Statutory Consultation on the Proposed Introduction of a Controlled Parking Zone (CPZ)

The Traffic Management Advisory Committee considered the report on the results of the statutory consultation on the proposed introduction of a Controlled Parking Zone (CPZ) into the Boston Road / Keston Road / Broughton Road Area which includes unrestricted roads bounded by London Road, Thornton Road and the existing Northern CPZ in the wards of Bensham Manor, Selhurst and West Thornton.

Mr Imran Khan addressed the Committee in his capacity as a local resident representing the Croydon Mosque & Islamic Centre. He explained that he was speaking in objection to the scheme because he worked within the community and local residents had noted that it would be harder for them to visit the centre and utilise the resources available due to the parking restrictions. He also stated that there were often funerals held in the Croydon Mosque & Islamic Centre and the CPZ would affect the family members needing to park. He added that not everybody had access to public transport and the proposed scheme would disadvantage these people.

Ms Sharon Baker addressed the Committee in her capacity as a local resident of Boston Road and explained that she was representing the 80 local residents who had signed the petition in support of the scheme. She explained that there were severe parking problems in the area due to the hospital being closely located; patients, staff and visitors were currently able to park for free, therefore, residents were unable to park near their properties. She noted that there were garages in the area and were using the free parking bays to fix cars in; one car had been permanently parked in Boston Road for eight months. There were safety issues with the current arrangements as residents were often having to park three roads away and walk passed alleyways in the dark.

Councillor Jewitt entered the Council Chamber at 1837 hours.

In response to the comments made by the public speakers the Parking Design Manager, David Wakeling, explained that the scheme was likely to benefit those attending the Croydon Mosque & Islamic Centre as the controls in the neighbouring areas had been received positively once implemented.

In response to Councillor Ali the Parking Design Manager noted that more disabled parking bays had been provided for the Croydon Mosque & Islamic Centre and limited free parking bays outside the hospital; however, explained that it was difficult to design a scheme to benefit all elements of the area.

The Head of Parking Services, Sarah Randall, explained to the Committee that there was currently a policy for the hearse and family support vehicles to park for free in all religious and non-religious venues which held funerals. Councillor Jewitt added that approximately 20 years ago all places of worship

within the Borough were issued cards for families attending funerals to display on their dashboards to park for free.

In response to the Chair the Parking Design Manager explained that the space in the Dunheved Road area would be maximised and was likely to fit the same amount of cars as currently, dependent on car size. The difference in space would be the implementation of double yellow lines in front of driveways, and this could impact residents with two cars who currently park in front of their drive.

RESOLVED – That the Traffic Management Advisory Committee agreed to recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:

- 1) Consider the responses received to the formal consultation on the proposed introduction of a CPZ into Boston Road, Broughton Road, Colvin Road, Curzon Road, Dunheved Close, Dunheved Road North, Dunheved Road South, Dunheved Road West, Furtherfield Close, Harcourt Road, Kenmare Road, Keston Road, Lynton Road, Marden Crescent, Marden Road, Oakwood Place, Oakwood Road, Ramsey Road, Sharland Close, Southwell Road, Stanley Grove, Stanley Road, Whitehall Road and York Road
- 2) Agree for the reasons detailed in this report to extend the Croydon Controlled Parking Zone into the above roads as shown on drawing nos. PD 369a 00, 01, 02, 03 & 04.
- 3) Agree to the extension of permit eligibility for this new CPZ to include property Nos. 39 - 353 Thornton Road odd numbers only (the east and south-eastern side).
- 4) Inform the objectors and supporters of the above decision.

6/19

Lakehall Road Area - Objections to the Proposed Extension of the Croydon CPZ (North N & N1 Permit Areas)

The Traffic Management Advisory Committee considered the report on the objections received from the public following the formal consultation process on a proposal to extend the existing Croydon Controlled Parking Zone (North N & N1 Permit Areas) to Bensham Lane, Bert Road, Fairgreen Road, Frant Road, Kingswood Avenue, Kimberley Road, Lakehall Road, Lakehall Gardens, Meadow View Road and Queenswood Avenue with a combination of shared-use (permit/pay-by-phone) bays and single yellow lines operating 0900 hours – 1700 hours, Monday to Saturday.

Ms Marzena Harrison addressed the Committee in her capacity as a local resident of Lakehall Road and explained that she was in support of the proposed CPZ as she had been a local resident for five years and the current residents were all having issues with parking in the area. She noted that

hospital workers and visitors parked in the area, in addition to large commercial vehicles, which often used more than one space. It was added that it was common for residents to have to park at least a 10 minute walk away from their house.

In response to Councillor Clark the Parking Design Manager explained that he was hopeful that hospital workers would use other modes of transport. They were still able to park in the area during the CPZ operational hours; however, it would be costly. Councillor Clark noted that the officers should encourage other modes of transport, such as; car share schemes and public transport.

Councillor Jewitt noted that she was in favour of the proposed CPZ; however, the hours should have been extended from 0900-1700 hours as it would not benefit those returning home from work after 1700 hours.

RESOLVED – That the Traffic Management Advisory Committee agreed to recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:

- 1) Consider the objections to extending the existing Croydon Controlled Parking Zone (North N & N1 Permit Areas) to Bensham Lane, Bert Road, Fairgreen Road, Frant Road, Kingswood Avenue, Kimberley Road, Lakehall Road, Lakehall Gardens, Meadow View Road and Queenswood Avenue with a combination of Shared-Use (Permit/Pay-by-phone) bays and single yellow lines operating 9am to 5pm, Monday to Saturday.
- 2) Agree for the reasons detailed in this report to extend the Croydon Controlled Parking Zone into the above roads as shown in drawing no. PD 382.
- 3) Inform the objectors and supporters of the above decision.

7/19

Objections to Proposed Parking Restrictions

The Traffic Management Advisory Committee considered the report which included the objections received from the public following the formal consultation process on a proposal to introduce 'At any time' waiting restrictions in Amberley Grove, Bywood Avenue, Dalmeny Avenue, Dunbar Avenue, Kilmartin Avenue, Melrose Avenue and Reedham Drive, and 7am to 7pm, Monday to Saturday, loading restrictions in a section of High Street, Croydon.

Ms Janice Lawrence addressed the Committee in her capacity as a local resident of Reedham Drive and explained that she was not in objection to the parking restrictions; however, the proposed double yellow lines were located incorrectly. It was explained that it was not appropriate for the double yellow lines to be outside number seven, Reedham Drive, as there were not existing problems here; however, she advised that the lines were introduced outside

numbers one, three and five Reedham Drive and urged the Committee to reconsider the recommendations outlined in the report.

The Parking Design Manager noted that the restrictions outside number 7 Reedham Drive could be relaxed as it would still allow refuse and emergency services vehicles to access the road. In response to Councillor Hoar it was confirmed that the officers could re-consult with the local residents and bring the new plans back to the Traffic Management Advisory Committee.

Mr Andrew Odusanya addressed the Committee in his capacity as a local resident of the Norbury & Pollards Hill ward and explained that he was speaking in objection to the proposals outlined in the report for Dalmeny Avenue, Dunbar Avenue, Kilmartin Avenue and Melrose Avenue. He noted that the proposed restrictions would negatively impact on the local residents as they would not be able to park close to their property and this would become a safety issue.

The Parking Design Manager recognised that there were current parking difficulties in the area so had designed a scheme to just restrict parking by the junctions.

Councillor Ben-Hassel addressed the Committee in her capacity as the local Ward Councillor for Norbury & Pollards Hill and explained that the residents were very supportive of the scheme as there had been parking problems in the area. She thanked the officers for their hard work to design a scheme to mitigate the problems in the area.

In response to Councillor Jewitt the Parking Design Manager explained that the Highway Code stated that vehicles should not parking within 10 meters of a junction and the police had the ability to issue tickets for this breach. He noted that the Council could introduce parking bays less than 10 meters; however, this had only been done in quieter areas if it was suitable. He confirmed with Councillor Jewitt that the proposed parking restrictions were in line with the Highway Code; however, the plans could be revised to have the double yellow lines seven meters long from each junction.

In response to queries raised regarding the safety issues in the Norbury & Pollards Hill ward, the Parking Design Manager explained that the proposed parking restrictions were in response to concerns received from the local residents. The majority of objections were regarding one particular junction in the area; however, the officers took the view of proposing restrictions for all nine junctions would benefit the area and residents.

In response to Councillor Clark's queries regarding High Street, Fairfield ward, the Head of Parking Services explained that there were current congestion issues on the road due to delivery vehicles, and these were particularly causing delay to the buses. The proposed loading bay on the opposite side of High Street was initially for Surrey Street market workers, as there was no vehicle access to Surrey Street; however, the affected public house could use it too. Councillor Clark noted concern for the proposals but explained that he

would like a restriction in the area to improve the safety for pedestrians and vehicle drivers and also to improve the congestion issues. He would stay in contacted with the affected public house and feedback to the officers. The Parking Design Manager clarified that the proposed scheme could be monitored for six months and then could be amended or revoked if it was not having a positive impact.

Councillor Hoar proposed that the introduction of the parking restrictions on Reedham Drive was postponed to allow time for the officers to re-consult with residents and design a new scheme for the area. The proposal for deferral was seconded by Councillor Jewitt. This amendment to the recommendations was **carried** unanimously.

Councillor Jewitt proposed an amendment to the recommendations for the proposed double yellow lines in the Norbury & Pollards Hill ward (Dalmeny Avenue, Dunbar Avenue, Kilmartin Avenue and Melrose Avenue) to be reduced from ten meters to seven meters. This amendment was seconded by Councillor Clark. This amendment to the recommendations was **carried** unanimously.

RESOLVED – That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration that they:

- 1) Consider the objections received to the proposed parking restrictions and the officer's recommendations in response to these in:
 - Amberley Grove, Addiscombe West
 - High Street, Croydon / Robert Street, Fairfield
 - Dalmeny Avenue / Dunbar Avenue / Kilmartin Avenue / Melrose Avenue, Norbury & Pollards Hill
 - Reedham Drive, Purley & Woodcote
 - Bywood Avenue, Shirley North
- 2) Agree the following, for the reasons set out in this report:
 - To proceed with the restrictions, as proposed, at each of the above locations, excluding the locations at Norbury & Pollards Hill ward and Reedham Drive due to the agreed amendments of the Committee.
- 3) Delegate to the Highway Improvement Manager, Highways, the authority to make the necessary Traffic Management Order under the Road Traffic Regulation Act 1984 (as amended) in order to implement recommendation 2 above.

8/19

Tollers Lane Estate - Highway Changes in Connection with the Introduction of a New Bus Service

The Traffic Management Advisory Committee considered the report which included the objections received from the public following the statutory

consultation process on a proposal to introduce 'At any time' waiting restrictions in Tollers Lane, Lacey Green, Goodenough Way, Ellis Road, Goodenough Close, Middle Close, Weston Close and Ellis Close. The Project Manager, Richard Lancaster, noted that the Committee was recommend to proceed with the waiting restrictions at the locations listed within the report, subject to Transport for London (TfL) taking the decision to introduce a bus service to serve the Tollers Lane Estate.

Mr Stuart Austen addressed the Committee in his capacity as a resident of Tollers Lane Estate and explained that he was in objection to the proposed waiting restrictions and the new bus route to be introduced by TfL. He had been a resident of Tollers Lane Estate for approximately two years and had moved due to it being quiet. He explained that there were two bus routes that were easily accessible from the estate and the report had noted that these were a seven minute walk away, but this was from the furthest dwelling from the stop; a solution would be for TfL to slightly extend the bus route 60 to the edge of the estate. The estate was not suitable for buses to access and having a route operating every 15 minutes would disturb the residents. There were already current parking issues in the area and the proposed restrictions would worsen these.

In response to the queries raised by the local resident the Project Manager explained that the walking distance to the current bus stops had been taken from a central point in the estate and for some residents the current distance was challenging. In response to the new bus route, additional parking spaces would be introduced. The Head of Transport, Ian Plowright, added that TfL were working to meet the London Mayor's objectives.

In response to Councillor Hoar the Head of Transport explained that TfL were yet to publish their formal findings from the consultation regarding the 404 bus route and the proposed waiting restrictions would not be implemented until this analysis was published.

Councillor Ali noted that there was a need for an improved bus route in the area and this had previously been discussed at the Public Transport Liaison Panel where residents had requested the new route.

RESOLVED – That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:

- 1) Considers the objections received to the proposed 'at any time' waiting restrictions and the officer's response to these in:
 - Tollers Lane
 - Lacey Green
 - Goodenough Way
 - Ellis Road
 - Junction of Goodenough Way / Goodenough Close
 - Junction of Goodenough Way / Middle Close
 - Junction of Goodenough Way / Weston Close

- Junction of Ellis Road / Ellis Close
- 2) Notes the changes that have been made to the proposals following the statutory consultation.
 - 3) Subject to Transport for London (TfL) taking the decision to introduce a bus service to serve the Tollers Lane Estate, to agree to introduce the 'at any time' waiting restrictions at the locations listed in paragraph 1.1 for the reasons set out in the report.
 - 4) Delegate to the Highway Improvement Manager, Highways, the authority to make the necessary Traffic Management Order under the Road Traffic Regulation Act 1984 (as amended) in order to implement recommendation 3 above.
 - 5) Officers to inform the objectors of the above decision.

9/19

Bensham Manor Area - Results of Informal Consultation on the Proposed Introduction of a Controlled Parking Zone (CPZ)

The Traffic Management Advisory Committee considered the report which considered the informal consultation on the proposed introduction of a CPZ into the Bensham Manor Area which includes roads bounded by the existing Thornton Heath CPZ, Princess Road area CPZ, proposed Lakehall Road area CPZ and Brigstock Road.

Ms Cheryl Samuels addressed the Committee in her capacity as a local resident and explained that she was supportive of the proposed CPZ; however, requested that it was operational from 0900 hours – 1830 hours at least, rather than 1700 hours which was recommended in the report. She had been a resident of the area for over ten years and there had been sufficient parking for residents up until recently; however, there were now significant displacement issues following the introduction of the CPZ in the Princess Road area. She noted that local residents of the Bensham Manor area had not been consulted before the implementation of the Princess Road area CPZ. There was a mix of vehicles owners in the area, namely; local workers, retired residents and young families, who would struggle to find a parking space after returning home after 1700 hours. Currently there were issues of dumped vehicles; untaxed cars, car sellers using the area and large vans, who were parked for long periods of time.

In response to the queries raised by the resident, the Parking Design Manager explained that the proposed 0900 hours – 1700 hours was replicating the existing CPZ in neighbouring areas, as changing times in neighbouring streets can confuse drivers. If the hours were to be extended, this would need to go through the informal consultation period again; therefore, he suggested that it was agreed to formally consult on the hours stated in the report and then this could be monitored when implemented and extended in the near future if needed.

Councillor Jewitt agreed with the Parking Design Manager and enquired how long the delay would be to extend the CPZ operational times. The Parking Design Manager noted that organising the informal consultation for different operational hours would delay the scheme by at least three months and it could not be guaranteed that the informal consultation results would be ready for the Traffic Management Advisory Committee in October 2019.

Councillor Clark noted that after hearing the resident speak it was clear that a CPZ was needed in the area and the Committee should agree to recommend that the scheme proceeds to the formal consultation stage and the times could be reviewed at a later date. The Parking Design Manager noted that there were no further proposals for Crystal Palace FC event day parking restrictions in the Bensham Manor area; however, following from the granted planning permission of the new viewing stand, the parking officers would be considering amendments to the existing CPZs in the affected areas.

The Chair urged the parking officers to review the CPZ operational times after it had been implemented for six months, following the formal consultation and agreement. The Parking Design Manager agreed to monitor the CPZ and feedback to the Traffic Management Advisory Committee.

RESOLVED – That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:

- 1) Consider the responses received to the informal consultation on the proposed introduction of a CPZ into the Bensham Manor Area.
- 2) Agree to proceed to the formal consultation stage for a proposal to introduce a new CPZ operational 0900 hours – 1700 hours Monday to Saturday into Attlee Close, Kynaston Avenue, Kynaston Crescent, Kynaston Road (south eastwards of Swain Road junction, Nos. 1 – 53 & 2 – 64), Palmerston Road, Pitt Road and Sandringham Road as shown on Drawing No. HWY/PD/0219/391.
- 3) If formal consultation is agreed, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give the notice.

10/19 **School Streets**

The Traffic Management Advisory Committee considered the report which included the engagement with 93 junior and primary schools; the receipt of 31 School Street requests; the identification of 11 favourable locations; and the selection method for proposing School Streets in an initial eight locations.

Councillor Ben-Hassel addressed the Committee in her capacity as a Ward Councillor and explained that the residents of Norbury & Pollards Hill had expressed strong support of the school streets scheme on the grounds of

safety and air quality. She expressed concern for the low response rate to the informal consultation and requested that officers provided Local Councillors with key facts to disperse to residents. She also queried whether there was a long-term plan to track the air quality in the area. In response, the Head of Parking noted that a FAQ document had been produced for parents and residents. It was also clarified that the officers were unable to monitor hospital admissions affected by air quality; however, air quality surveys were being completed before and after the scheme and one survey a year after implementation.

In response to Councillor Hoar the Head of Parking Services explained that formal consultation would include with the selected schools, parents of the school pupils, and the local area, which would be approximately a 200 meter radius from the school to ensure directly and indirectly affected residents were included. It was added that a very low response had been received in some areas that were informally consulted, which had affected the statistics in the report; however, all letters were hand delivered.

The Head of Parking Services explained to the Committee that they were unable to estimate the income from fine paying as the school streets scheme was being accepted across wider London; therefore, as more Councils adopted it, the compliance would be higher.

Councillor Ali noted that if the scheme was implemented, Croydon would be one of the leading Boroughs with the school streets scheme and this was very positive. He explained that the finance should not be a concern as the scheme was being proposed for positive reasons, including; ensuring road safety, improving air quality, and improving congestion. He noted that there had been appropriate communication and press explaining these reasons and thanked the officers for their hard work. The Chair seconded Councillor Ali's comments.

It was confirmed that if a positive response was received through the formal feedback process and the Traffic Management Order (TMO) was agreed then the scheme would be implemented as permanent and not on a trial basis.

In response to Councillor Hoar it was explained that the 90 minute window was being proposed to introduce a uniform approach to the school streets scheme; it was also confirmed that sites that hosted just secondary or primary schools would have a slightly shorter window of time. The timings were also recommended as a result of the consultation with the schools and local residents. The Head of Parking Services also noted that following the trial schemes, there had been a positive change in behaviour from the parents and children were using different modes of transport to get to school.

In response to Councillor Mohan it was noted that parents would be consulted during the formal consultation period and that the feedback received from the residents and schools during the informal consultation had been positive from all eight sites.

In response to Councillor Hoar the Head of Parking Services confirmed to look in to improving the markings, including road markings, near the Harris Academy Purley site.

Councillor Mohan noted that there was not enough evidence to support the scheme as the response rate from informal consultation was low and parents had not yet been consulted. He explained he was not opposed to the scheme but would abstain from the vote. Councillor Hoar agreed with Councillor Mohan's comments and explained that he would also abstain.

The Head of Parking Services confirmed that the formal consultation results would be reported at the Traffic Management Advisory Committee on 10 July 2019, and if it was agreed the scheme would be implemented in September 2019.

A recorded vote was requested and taken on the recommendations listed in the report. The recommendations were **carried** with Councillors King, Ali, Clark and Jewitt in support, and Councillors Hoar and Mohan abstaining.

RESOLVED – That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:

- 1) Note the engagement with 93 junior and primary schools; the receipt of 31 School Street requests; the identification of 11 favourable locations; and the selection method for proposing School Streets in an initial 8 locations. Note that 2 further schools have requested a scheme, subsequent to the initial assessments and selections were made.
- 2) Note the summary of responses received to the informal engagement with residents, businesses and other occupiers within the areas potentially affected by the 8 School Street proposals.
- 3) Note the Executive Director of Place has agreed to proceed with formal consultations on proposals to introduce 8 separate School Street schemes in the following locations:
 - Norbury Manor Primary (Norbury Park ward)
 - Fairchildes Primary School (New Addington South ward)
 - Harris Academy Purley (Purley Oaks & Riddlesdown ward)
 - Winterbourne Junior Girls and Boys School (Bensham Manor ward)
 - Cypress Primary School (Crystal Palace & Upper Norwood ward)
 - Downsview Primary & Nursery (Norbury Park ward)
 - Harris Primary Academy Kenley (Kenley ward)
 - West Thornton Primary Academy, Rosecourt Road site (West Thornton)

The Highway Improvement Manager, Public Realm Directorate has been delegated the authority to give the Public Notice for formal consultation.

- 4) Note the results of formal consultations is a Key Decision and as such will be referred to the Traffic Management Advisory Committee for advising the Cabinet Member for Transport and Environment (job share) on whether or not to implement the proposals.

11/19 **Exclusion of the Press and Public**

This was not required.

The meeting ended at 8.30 pm

Signed:

Date:

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 24 July 2019
SUBJECT:	OBJECTIONS TO EMISSION-BASED PARKING PERMIT CHARGES AND DIESEL SURCHARGES FOR PERMITS
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place
CABINET MEMBER:	Councillor Stuart King, Acting Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:	
<p>The emission-based parking charges contribute towards the aims of the Corporate Plan for a cleaner and more sustainable environment, and happy, healthy and independent lives.</p> <p>The driver for the emission-based charges is Croydon's Air Quality Action Plan 2017-22, which aims to reduce exposure to air pollution and raising awareness for those who live and work in Croydon, and the Parking Policy incorporating elements of the National Clean Air Strategy 2019, which aims to clean up the UK's air and reduce the damaging impact air pollution has on public health, including the harmful emissions from vehicles amongst other sources, and the Mayor's Transport Strategy 2018, which prioritises public health and aims to reduce car dependency.</p>	
FINANCIAL IMPACT:	
<p>The required capital expenditure of £38k will be funded via a bid to Growth Board. The annual £110k revenue expenditure will be met from revenue generated from the emission-based permit sales. Revenue generated is expected to decline in future years as owners gradually replace vehicles with lower emission models for lower permit charges.</p> <p>It is noted that the Road Traffic Regulation Act 1984 (RTRA) is not a fiscal measure and does not authorise the authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.</p>	
FORWARD PLAN REFERENCE: The decision when taken by the Executive Director Place in accordance with the delegation from Cabinet dated 25 March 2019 will be a key decision.	
RECOMMENDATIONS:	
<p>Traffic Management Advisory Committee is asked to:</p> <p>1.1 Consider the responses received to the formal consultation on the proposed introduction of emission-based parking permit charges and the contents of the report and make such comments to the Cabinet Member for Environment, Transport and Regeneration (Job Share) as they consider necessary.</p>	

- 1.2 Note that in accordance with the delegation from Cabinet dated 25 March 2019, the Executive Director Place, in consultation with the Cabinet Member for Environment, Transport and Regeneration (Job Share) is authorised to consider the outcome of the consultation regarding Emission-Based Parking Charges; and subject to there being no significant changes which would necessitate further consultation, finalise, agree and implement the Emission-Based Parking Charges proposals (see Appendix 1). Note that any proposals requiring significant changes or further consultation will be brought back to Cabinet for consideration.

2 EXECUTIVE SUMMARY

- 2.1 The proposed parking charges structure, see Appendix 1, is a means to influencing car ownership and use. It therefore has a role to play in addressing the borough's air quality and public health challenges.
- 2.2 The introduction of emission-based parking addresses over-arching national, regional and local drivers with an aim of reducing emissions in Croydon.
- 2.3 A Public Notice of consultation was given on 23 May 2019, inviting objections by 20 June 2019. The Notice and proposed parking permit charges are included in Appendix 2.
- 2.4 1,039 objections were received, equivalent to 10% of parking permit holders by quantity. The consultation has not identified any material objections which officers consider would invalidate the objectives for introducing emission-based parking charges.
- 2.5 The required capital expenditure of £28k in 2019/20 and £10k in 2020/21 will be funded via a bid to Capital Growth. The emission-based parking permit charges will incur additional expenditure and income. The costs of implementing the new charging structure will become operationally self-financing by year 2 and is expected to peak at £162k surplus in 2021/22. This surplus is expected to decline in the following years, as a result of owners gradually replacing vehicles with lower emission models for lower permit charges. It is noted that the Road Traffic Regulation Act 1984 (RTRA) pursuant to which any such changes to parking charges would be introduced, is not a fiscal measure and does not authorise the authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 2.6 This report details the objections and officer responses to these objections and recommends support for the introduction of emission-based parking charges and diesel surcharges for permits.

3 DETAILS

3.1 POLICY BACKGROUND

3.1.1 The introduction of emission-based parking charges addresses over-arching national, regional and local drivers with an aim of reducing emissions. The full list of these initiatives can be found in the Cabinet report of 25 March 2019 for the introduction of a Parking Policy, which can be accessed via the following link:

<https://democracy.croydon.gov.uk/documents/s14463/Parking%20Policy%20report.pdf>, however, some specific examples include:

- The National Clean Air Strategy 2019, with aims to clean up the UK's air and reduce the damaging impact air pollution has on public health, including the harmful emissions from vehicles amongst other sources,
- The national Road to Zero Strategy aims for 50-70% new car sales to be Ultra Low Emission Vehicles (ULEVs) by 2030 and to enable the rollout of supporting Electric Vehicle (EV) infrastructure and reduce emissions already on the roads.
- The Mayor's Transport Strategy 2018, which prioritises public health and aims to reduce car dependency,
- Croydon's Air Quality Action Plan 2017-22, which aims to reduce exposure to air pollution and raising awareness for those who live and work in Croydon.

3.1.2 As the borough continues to grow in population and density the policy on emission-based parking charges aims to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside.

3.1.3 The number of cars registered in Croydon grew from 132,572 in 2001 to 148,256 in 2016 (latest analysis). 10,000 of this growth occurred in the latter 3 years.

3.1.4 When demand for parking in a location now exceeds the available kerbside space, occupiers are faced with the choice of parking in neighbouring locations or giving up the car. Emission-based charges would help influence the choices of those who are able to give up the car. This includes owners of infrequently used cars, which most of the time obstruct access, and multiple car households, who take up more than a proportionate share of space. The emission-based charges would also encourage a switch to lesser polluting cars, which on average tend to be smaller in size and impact less on available space and public realm.

3.1.5 Every car journey starts and ends with a parking space. The parking charges structure is therefore an important means to influencing car ownership and use. Parking management therefore has a role to play in addressing the borough's air quality and public health challenges. Many elements of car ownership and usage costs are already being used to influence behaviours, including road tax,

diesel fuel duty and differential congestion charges, but these are national or regional schemes.

There are currently insufficient borough level measures and tools in place to address areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.

- 3.1.6 The Cabinet report of 25 March 2019 set out that it was considered that the discount offered, relative to the highest charge band 5, must be sufficient to create a real incentive for a car owner to switch to a lower emission car – i.e. if the charging differential is too low then it would not, in itself, encourage a switch to a lower emission car. By this concept, the lowest charge band 1 must therefore be perceived as exceptionally attractive, while the highest band 5 must be perceived as high.

The proposal for 5 emission bands is a trade-off between system complexity and encouragement effect. 5 bands mirror what most London boroughs have chosen. The lower 2 bands represent zero emission electric vehicles and low emission hybrid vehicles respectively. The upper limit of 75g/km is aligned to the governments low emission car and van grants scheme (www.gov.uk/plug-in-cars-van-grants). Band 2 covers most Plug-in Hybrid Electric Vehicles (PHEV), Range Extended (REX) hybrids and some Mild Hybrid (electrically assisted for a degree of energy saving) vehicle models. The weblink above demonstrates how some large car and van models will qualify for the reduced Band 2 charges.

In 2018, the government reassessed the CO2 emission figures for some so-called Mild Hybrids and Parallel Hybrid models, which have driver selectable powertrains and can effectively be driven permanently in petrol/diesel mode. As result, several of these models now figure above the 75g/km Band 2 threshold, whereas prior to 2018 they would have been below.

- 3.1.7 Band 3, for all permit types, currently covers the largest proportion of parking permits. The resident permit in Band 3 increases from £80 to £104 (30%), to reflect the objectives for managing kerbside space and air quality. The £80 charge was set in 2013. The ONS Retail Price Index has increased 15% since. The continual growth in car ownership has made space a premium within the parking congested CPZs, resulting in insensitivity to charges and worsening in parking congestion. The £80 charge is therefore no longer effective in managing space demand. Residents with multiple cars or infrequently used cars need encouragement in choosing whether they can do without one or more cars, many of which are parked for longer periods of time taking up kerb space where parking congestion affects access and impacts on public realm. If band 3 was kept at £80, then it would also not present a call or incentive for owners to switch to lower emissions.

3.1.8 There were 10,636 active parking permits at the at the end of 2018, as follows:

- 9,048 resident permits.
- 285 business permits.
- 107 all-zone permits (on-street only).
- 36 all-zone permits (on and off-street).
- 24 doctor bay permits.
- 475 council permits (e.g. Social Services home visiting staff).
- 411 neighbourhood Care permits (e.g. NHS care in the community staff).
- 80 statutory undertaker permits.
- 170 charity permits.
- 1,540 visitor permits (day permits issued over the 2018 calendar year).

3.1.9 Three parking permit types will not be subjected the emissions-charge banding:

1. 6-week temporary resident permit, which is issued while a resident is in process of moving house or changing car, and while the DVLA document for verifying the vehicle's CO2 emission is therefore not available.
2. Disabled companion badge, which in some circumstances is issued to support a disabled blue badge. The badge is exempt from parking charges, although its issue has a small administration fee.
3. Croydon Neighbourhood Care Association permit. This accounts for a small number of free issued permits (currently 6) permits, which are not vehicle specific. They are shared between about 300 charity volunteers supporting the disabled and elderly/frail in the community.

3.1.10 If introduced, the emission-based charges will be launched in three stages (the first 2 stages being the recommendation of this report):

- 1) Residents' permits – from October 2019, when a permit is next up for renewal in the 12-month period that follows.
- 2) Business and other permits, and Diesel surcharging for permits – from April 2020.
- 3) On-street (i.e. in public roads with pay and display bays) and off-street (i.e. in council operated public car parks) parking charges, and Diesel surcharging for on- and off-street parking – from April 2021 (NB: to be developed and consulted on at a later date, see 3.1.11 below).

3.1.11 The time window for consulting on a proposed Traffic Management Order for the introduction of on and off-street emission-based parking charges is not yet open and this stage of the scheme has some technical dependencies that are still to be established. It is envisaged this consultation will take place in 2020-21, in advance of its proposed introduction.

3.2 PRIOR ENGAGEMENT

3.2.1 A survey the Air Quality Action Plan (AQAP) in July 2017 found 76% of 356 respondents rated their views on air pollution as 'very important' and a further 14% rated their views as 'important'. 88% agreed that the AQAP healthy streets initiatives are important.

3.2.2 A survey on the future of transport for the draft third Local Implementation Plan (LIP3) in September 2018 found that 74% of 994 respondents are concerned about air quality in Croydon and 72% agreed that traffic levels should be lowered.

3.2.3 An engagement survey on the draft Parking Policy, in March 2019, described the objectives and timeline for introducing emission-based parking charges. In this prior engagement:

- When residents were asked open ended questions on the views and impacts from parking charges, and specifically highlighting emission-based charges:
 - 25% expressed concerns.
 - 16% expressed support.
 - 60% were neutral, neither concerned nor supporting.
- 11% of respondents expressed a concern that the policy on emission-based charges would impact disproportionately on low income residents, who cannot afford to replace their car.
- 3% were concerned about the diesel surcharge being unfair to owners, who in the past were encouraged to buy diesel.
- 3% were concerned emission-based would have a negative impact on Croydon and the High Street economy, including pushing affluent shoppers in big cars out of town.

The various concerns are considered in the final proposal and responses (section 3.3.2 below). As part of the approval of the revised charges, it is proposed, with a view to reducing the complexity of the scheme, to recommend to the Executive Director that the Council permit (mainly Adult and Children Services) and Neighbourhood Care permit (mainly NHS) be merged into a single Community Care permit; and to merge the two All-zones permits into a single one. It is also suggested that the visitor permit is reduced to 3 emission bands, to align with the future envisaged on-street charges structure.

3.3 STATUTORY CONSULTATION

3.3.1 A Public Notice was given on 23 May 2019, with a 4-week consultation period until 20 June 2019 (see Appendix 2). This is 1 week longer than required by the statutory procedure. The Notice details the proposed emission-based parking charges and invites objections. The communication of the Notice have included:

- Publication in the London Gazette on 23 May 2019.
- Publication in the Croydon Guardian on 23 May 2019.
- Email notification on 23 May 2019 to 96 interest groups throughout the borough, including the 3 emergency services.
- Email notification on 24 May to 13,738 current and past parking permit holders, who have provided their email address as a means of contact.
- Letter notification on 23 May to 310 permit holders, for who an email address is not held.

- 8 Tweets, spaced about 4 days apart.
- 1 Facebook post.
- 1 Your Croydon article.
- 1 Our Croydon article.
- 1 Schools Bulletin article.

The first 24 hours following the email communication generated the highest daily number of online survey responses, signifying that the 10,636 active permit holders were effectively reached. It is unavoidable that in a mass-communication, including a portion of historic email and postal addresses, some notifications were not read by the intended recipients. The emails were specifically designed to best avoid the triggers used by common junk mail filters. In other cases, the recipients are no longer active or have gone away. 162 of the emails were rejected as undeliverable.

In the consultation responses, 9 respondents state they did not receive the direct notification about the consultation. Separately, the project has received 3 contacts from permit holders raising concern over not having received the notification email. After verification and follow-up, 1 of the contacts acknowledged that the email may in fact have been received, but it wasn't noticed. Another acknowledged that a defunct email address may have been provided. The third contact did not follow up, but has responded to the consultation.

In the consultation responses, 1 respondent states an opinion that every household in the borough should have been sent a consultation letter about the permit charges, instead of just contacting permit holders.

3.3.2 Total 1,149 unique respondents replied end of 20 June 2019:

- 1,039 respondents object or are concerned.
- 62 respondents are in support.
- 48 respondents make comments that are neither an objection nor support.

NB: Multiple unique comments made by the same single respondent are separated and counted as multiple unique comments, including when the respondent made multiple submissions to the consultation. Multiple identical, repeat comments made by the same single respondent are counted as 1 comment. In total 1,149 unique respondents made 1,167 unique comments.

All 1,149 responses, are available in the background document to this report (see link at end of this report) in an anonymised format.

For purpose of making a meaningful report on the extensive consultation and its high number of responses, those statements that are highly similar are grouped into identical summary statements. These statements have been considered collectively and will receive officer comments. Other statements are unique and have been addressed individually below.

30 (3%) addresses have submitted 2 or more responses, from differently named individuals. All of these responses are accepted and considered as individual responses.

91 (9%) respondents have submitted more than one response. The multiple responses from each these 91 individuals are merged into a single response, for each individual, encompassing all of the points they have made. No comments have been ignored, but repeated identical comments from a single individual are counted as one comment, from one respondent.

55 (5%) respondents have provided insufficient address information to enable a reply. All comments in these 55 responses are accepted and considered, but cannot practically be replied to. The respondents concerned have the opportunity to read the responses made in this report, which is placed in the public domain.

3.3.3 The statutory procedure is to invite and respond to objections. The 62 (5%) responses in support for the emission-based permit charges are noted, but do not require responses under the statutory procedure. They will nonetheless receive a reply acknowledging their contribution. Example responses in support of the proposals include:

- *“I agree with the proposal. We need to encourage the adoption of low/zero emission vehicles and do more to discourage the use of those that are polluting the air quality for residents”.* [ID 118]
- *“I want to support the scheme – it is an excellent idea”.* [ID 396]
- *“After looking at the costs of the permits I think emission based parking is a good idea. We have 2 cars in our family home, one of them registered before 2001. We will be getting rid of this car as we don't really need it, or drive it much. It is a higher polluting vehicle and it will save us money in the long run if we dispose of it and hopefully help our environment. Yippee. Well done Croydon Council”.* [ID 1015]

The 48 (4%) of responses that cannot be reliably interpreted as either for or against emission-based parking charges will receive a reply stating there was no point to consider. Examples of such other responses include:

- *“I have no objection to the policies that the council intend to impose, but how will this reflect on busses, taxis and emergency vehicles?”* [ID 420]
- *“My car is hybrid so limited impact”* [ID 440]
- *“My partner never has anywhere to park close to my house when he visits. I don't own a car, many of my neighbours have 2 or 3!”* [ID 691]

3.3.4 Tables 1 and 2 summarise the 145 similar and unique objections and the project officer's responses.

NB: Multiple unique comments made by the same single respondent are separated and counted as multiple unique comments, including when the respondent made multiple submissions to the consultation. Multiple identical, repeat comments made by the same single respondent are counted as 1 comment.

Table 1 – Top 37 grounds for objection, which more than 10 respondents have commented on. They are ranked in order of the number of respondents commenting.

Objections and officer's response
<p>217 respondents (19%) commented:</p> <p><i>The Council is only doing this to generate income. It is a stealth tax, taking advantage of car owners.</i></p> <p><u>Officer response:</u></p> <p>Using parking schemes as a means to raise income would be inconsistent with the Road Traffic Regulations Act 1984. The charges are determined to meet the traffic management objectives for reducing the number of cars on the road and air pollution. There is no related experience that will help model the exact effects from the new charges on car ownership and the number of parking permits issued. Surplus from parking charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass.</p> <p>The new charges are considered necessary to influence the otherwise continuing increase in the number of parked and driving cars on the road in the Borough. Since the permit charges were last reviewed in 2013 there has been a 7% growth in the number of vehicles registered in Croydon. This has meant that there is an increasing pressure for parking spaces and drivers have become de-sensitised to the charges applied, hence reducing their effectiveness for demand management. The permit charges set in 2013 are currently too low for achieving the parking management objectives. This is evident in the number of respondents to this consultation saying it is too difficult to find a parking space. This results in residents circulating the neighbourhood in search for a parking space which inevitably adds to congestion and air pollution.</p>
<p>154 respondents (13%) commented:</p> <p><i>The emission-based charges are unfair to those who cannot afford a newer car, which includes the poorest, elderly and vulnerable.</i></p> <p><u>Officer response:</u></p> <p>In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants. The national Clean Air Strategy 2019 and the London Mayor's Strategy require actions to reduce NOx and particulate matter emissions mainly at a local level. If parking charges were to be maintained at a lower level, then it is considered unlikely to influence a sufficient number of owners in their next car choices or indeed choices to have two or more vehicles and this in turn would impact negatively on the overarching objectives, as set out in paragraph 3.1.1. Residents and local businesses for whom parking and</p>

road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars. We must also consider fairness to residents who are vulnerable to air pollution, which disproportionately are the young, the elderly and those who live in some of the poorest areas of the borough. They represent groups that tend to have lower car ownership.

Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution is an important and increasingly more high profile public health issue, contributing to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution.

Surplus from parking permit charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly support the portion of the elder population that do not have a car or who choose to use public transport.

The holders of 11,459 individual and 71 organisational blue badges issued in Croydon are exempt from the parking charges.

In context of the 148,256 (in 2016) vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles in the highest emission group and 413 that predate Mar 2001. This equates to 8.7% of all active resident parking permits (9,048) as at the end of 2018, which are issued to residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. The proposed charges can therefore not be generalised as having a disproportionate effect on residents with low income.

128 respondents (11%) commented:

Oppose or strongly oppose the emission-based parking permit charges, but without providing any grounds.

Officer response:

The opposition is noted.

119 respondents (10%) commented:

The emissions charges are unfair to owners of little used cars, who offset by frequent walking, cycling or public transport use. Parked cars do not pollute. This is not polluter pay.

Officer response:

Firstly, the charges are not only increased for the high-polluting vehicles, but they are also substantially reduced for low-polluting vehicles. This presents an opportunity for people who use the car infrequently, to eventually lower their parking costs by choosing a lower emission model at their next car choice.

Cars are generally owned for purpose of driving. When the parked car is driven, it contributes to pollution. All car ownership therefore contributes to pollution, in various amounts. The adoption of lower emission vehicles amongst parked cars will contribute to improved air quality.

A sizable number of respondents in this consultation express concern about daily problems of not being able to find a parking space near to home. Infrequently used cars also occupy the over-subscribed kerbside space in residential roads. They therefore contribute equally to access difficulties and impact on the public realm. A number of respondents to this consultation say it is currently too difficult to find a parking space in their CPZ. The necessity that residents circulate the neighbourhood in search for a parking space adds to congestion and air pollution.

Cars that remain parked for longer periods of time, reduce the number of available parking spaces which indirectly increases the circulation of traffic which is searching for parking spaces. Some of these little used cars, and second or third cars, could be candidates for conversion to shared pool car uses or other alternatives to car ownership. The emission-based charges will help encourage this. The Council has a policy to support the expansion of car share schemes.

The permit charge must be an influencer for those who are able and willing to consider the alternatives to car ownership and the emission-levels in their next car choice. If permit charges were to be set at a lower level then it would not influence a sufficient number of owners in their next car choices or support the objectives as detailed in this report at section 3.1.1.

65 respondents (6%) commented:

Drivers are taxed enough already.

Officer response:

The continual growth in the number of cars on the road indicates that ownership is overall, becoming more affordable. Many elements of car ownership and usage costs are already being used to influence behaviours, including road tax, diesel fuel duty and differential congestion charges in London. However these are national or regional schemes, which tend to be moderated for the general national denominator and Central London. These measures are insufficient to help stem the number of cars on the roads in Croydon, where the number of vehicles registered in the borough has grown 7% since 2013.

The national Clean Air Strategy 2019 devolves responsibility to further reduce the damaging impact air pollution has on public health, mainly to a local level. The London Mayor's targets for car use reduction in outer boroughs are similarly devolved to local levels. Without the introduction of emissions-based parking charges it is considered that there would be insufficiency in addressing the public health concerns locally.

64 respondents (6%) commented:

Parking and permits are expensive enough already.

Officer response:

The proposed permit charges for the 2 lower emission bands are lower than the current pre-existing charges of £80, and this represents an opportunity to obtain a lower priced parking permit when next choosing a car. The other 3 bands serve as an encouragement to adopt cars with lower emissions or to reconsider non-essential car ownership.

The forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index increase, since the permit charges were last reviewed in 2013.

Many respondents to this consultation have expressed concern over the lack of availability of parking spaces, which would indicate that current levels of parking control measures are not achieving their objectives for managing access.

The permit charges set in 2013 are currently too low to support access and to encourage a switch to lower emission cars. The differential in the charging bands must be sufficient to encourage low emission and to discourage high emission. Narrowing the charging differential, to lessen the permit charge for high-polluting vehicles and second cars, would detract from meeting the parking management objectives. The new charges are required to influence a necessary change.

63 respondents (5%) commented:

Diesel is getting unfair press and owners were encouraged to buy diesels.

Officer response:

The diesel surcharge will only apply to vehicles that are more than 4 years old.

The national policy on favouring diesel started to progressively reverse in 2009, when the scrappage scheme was also introduced for older cars. According to the Society of Motor Manufacturers and Traders, the growth in the registrations of new diesel cars levelled off in 2015 and has since been in decline. Diesel currently continue to have a positive role in wider CO2 reduction, in particular for motorway driving where pollution disperses more

easily. Older diesel cars, however, contribute disproportionately to NOx in build-up urban areas.

The national Clean Air Strategy 2019 has devolved responsibility for further reducing urban NOx emissions mainly to a local level. The Mayor has introduced ULEZ in Central London and there is a requirement that the outer London boroughs implement local Air Quality Action Plans. NHS data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions from older diesel (and older petrol) cars in Croydon would deprive many local people of their ability to breathe safe air.

Several manufacturers currently operate diesel scrappage schemes, offering between £2,000 and £6,000 discounts. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. This subsidy opportunity is available to owners of older diesel vehicles.

42 respondents (4%) commented:

The charges are unfair to the poor and vulnerable. People on low and high incomes all have an equal right to park.

23 respondents (2%) commented:

I cannot afford to pay the increased charges.

4 respondents (<1%) commented:

This will cause me severe financial hardship. Forces me to sell my house. Forces me to resign from my job and claim benefits instead.

1 respondent (<1%) commented:

The scheme does not consider the car owner's financial status.

1 respondent (<1%) commented:

Are people claiming benefits and own a car going to be let off charges?

Officer response:

Any change to fee structures will have an impact on local residents and it is important to note that the forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index, since the permit charges were last reviewed in 2013.

The permit charge will remain a relatively modest element of the total cost of car ownership. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost.

41 respondents (4%) commented:

Unfair to residents living in a CPZ, while not addressing high-polluting cars outside CPZs. It is unequal and creates divisions in the community.

Officer response:

The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. In non-CPZ locations, the congestion either does not exist to the same level or has not been raised as a concern yet and therefore does not need managing at this point in time. The Council does not implement CPZs where they are not necessary. In most cases the need for CPZs are within the higher density geographical areas and less so in lower density areas.

The next phases of the emission-based parking charges will address polluting vehicles traveling within the borough to public parking places in general, and not just in residential CPZs. These additional proposals cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment technology, which is being addressed separately to emissions-based permit charges in CPZs.

40 respondents (4%) commented:

Residents have received insufficient forewarning and time to adjust, when considering that the normal car replacement cycle. The charges could wait until next time a permit holder replaces the car, to enable a fair choice.

Officer response:

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban emissions mainly to a local level. These actions are required to start showing measurable results by 2021. Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London and 7.5% of premature deaths in Croydon are linked to air pollution. Delaying the new charges until the next car replacement would encourage a proportion of car owners to keep their current high-emission vehicle for longer. Failing to address emissions in a timely manner would deprive many local people of safe air.

38 respondents (3%) commented:

There are too few EVCPs (Electric Vehicle Charging Points) to support the transition to electric vehicles.

Officer response:

The Council is currently rolling out on-street charging points and plan to reach 400 public charging points by 2022.

The government currently offers a £500 grant for home charging points for category 2 and 3 plug-in hybrid vehicles, which are available to new low emission vehicle owners.

36 respondents (3%) commented:

Charging local residents is ineffective and unfair, when emissions are also cause by outsiders driving through or into Croydon.

Officer response:

The first phase of emission-base parking charges addresses the most parking congested roads within residential CPZs.

The next phases of the proposed emission-based parking charges will look to additionally address polluting vehicles traveling within and into the borough, to public parking places in general. These new proposed charges cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment technology, which is being addressed separately to emissions-based permit charges in CPZs.

33 respondents (3%) commented:

Emissions need lowering, but this is the wrong way to go about it (not specifying an alternative solution).

Officer response:

The Council will keep an open mind and support emissions-reduction solutions as they are identified in all fields. New solutions could be considered for replacing the emissions-based permit charges. For the emissions and car reduction to show their required effects by 2021, however, the recommended emission-based charges cannot be delayed for yet unknown and unspecified alternative solutions to be developed. Private car transport is just one aspect of local air pollution, but a major contributor to local traffic and parking congestion.

The national Clean Air Strategy 2019 devolves responsibility to further reduce the damaging impact air pollution has on public health, mainly to a local level. The London Mayor's targets for car use reduction in outer boroughs are similarly devolved to local levels. Without the introduction of emissions-based

parking charges it is considered that there would be insufficient measures to influence car ownership and to address the public health concerns locally.

32 respondents (3%) commented:

It is unfair to essential car users who work unsocial hours, must drive their children, are vulnerable, carry loads and live in hilly borough.

Officer response:

Any change to fee structures will have an impact on local residents and it is important to note that the forecast model based on assumptions of changing car ownership, shows a net increase of 13.5% remains less than the 15% ONS Retail Price Index, since the permit charges were last reviewed in 2013.

The permit charge will remain a relatively modest element of the total cost of car ownership. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost. It is, however, important to seek to influence a choice in lower emission vehicles for essential and frequent car users.

The scheme does not automatically assume that the transport of children as being essential. The Third Local Implementation Plan reflects the Croydon local plan and the London Mayors Transport Strategy, including that all local Councils must help children and parents to use cars less and walk, cycle and use public transport more.

The proposed scheme has concessions for Blue Badge holders and care charities and others as detailed in paragraphs 3.1.9 of the report.

28 respondents (2%) commented:

I already pay my council tax and don't want more tax.

Officer response:

The parking permit charges do not form part of general taxation. They are introduced to influence and achieve traffic management objectives, which include air quality considerations which form part of the national air quality strategy. Any surplus from parking charges are ring-fenced to highways and transport schemes required by the provisions of Section 55 of the RTRA and, for example, contributes significantly to sustaining public transport fare concessions.

28 respondents (2%) commented:

Public transport infrastructure is inadequate, too pricy or too unfriendly to substitute for the car and will need improving first.

Officer response:

The Council has an ongoing programme of works with the Mayor, Transport for London, Network Rail and Train Operating Companies to improve public transport links to our local high streets, including introducing new routes to better connect Croydon's places and to increase capacity. More details can be found in the Local Implementation Plan:

<https://www.croydon.gov.uk/transportandstreets/policies/third-local-implementation-plan>

26 respondents (2%) commented:

It is unfair to residents who do not have private driveway.

Officer response:

Most homes in Croydon were built in a comparatively car-free age when house builders in denser populated areas did not need to consider space for private driveways. Traditionally there was a difference in the nature of higher density urban living and lower density sub-urban living. In the future as demand for homes grows there will be an intensification of our suburbs which will require forward planning to manage the parking infrastructure.

The lack of private driveways was not a problem at the time when most residential streets in Croydon were laid out. The problem has only arisen as a result of an excessive increase in car ownership proportionate to the available road space. The solution today should look to stall or reverse the continued growth of the number of cars requiring a parking space and the impacts of car ownership relative to the impact on air quality as detailed in paragraph 3.1.1 above. The emission-based permit charges are intended to help residents re-consider non-essential car ownership.

25 respondents (2%) commented:

It just increases parking costs but does still not guarantee a parking space near to home.

Officer response:

As the borough continues to grow in population and density the introduction of emission-based parking charges aims to address overarching national, regional and local drivers with an aim of reducing emissions. Such charges would encourage a lesser reliance on cars and a switch to lesser polluting cars, which on average tend to be smaller in size and impact less on available space and public realm.

The solution to better assuring availability to a parking space is to reduce the number of cars requiring a parking space. This would mean that some residents and businesses giving up non-essential car ownership. Infrequently used cars and second and third cars are for example disproportionately occupying the over-subscribed space in residential roads. The residents who have a rarely needed car, including a second car, are candidates for

considering the alternatives to car ownership. The emission-based charges will help encourage this.

23 respondents (2%) commented:

There is too much development being permitted in Croydon, which results in more cars.

Officer response:

Of the developments currently taking place across Croydon, the highest intensity projects are located close to transport and commercial centres. Residents in such developments will be within walking distance of shopping, leisure, work and public transport. The planners have therefore been able to restrict their access to permit parking bays and require more car share schemes. Although the number of residents in Croydon will increase, the developments will help dilute car ownership per head of population.

21 respondents (2%) commented:

The higher £300 represents 375% increase and is unreasonably high.

Officer response:

In context of the 148,256 (in 2016) vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles in the highest emission group and 413 that predate Mar 2001. However, these vehicles add disproportionately more to emissions in congested residential CPZ streets. It is therefore considered important to enhance the perception of the permit charge differential, to effectively influence car ownership choices.

18 respondents (2%) commented:

This will not reduce emissions. People need their cars and there will still be cars on the road.

Officer response:

The debate that the current proposal has spurred is already proving helpful. This is exemplified by a few of the respondents to the consultation declaring that they will now give up their cars. One respondent expressed thanks to the Council for its decision to encourage the respondent to give up one of the family cars.

A further phase of emission-based parking charges is being developed to address polluting vehicles traveling within the borough to public parking places in general (i.e. on and off street parking spaces), and not just in residential CPZs. These new proposed charges cannot be immediately implemented, as they depend on the prior uptake in mobile parking payment

technology, which is being addressed separately to emissions-based permit charges in CPZs.

18 respondents (2%) commented:

Unfair to pre-2001 cars that have low emission or low mileage.

2 respondents (<1%) commented:

Raising permits from £80 to £300 for classic and historic cars is unreasonable.

1 respondent (<1%) commented:

Apply to vehicles registered after 2006 only, to avoid unnecessary scrapping of older cars.

Officer response:

Standards for measuring and declaring emissions were not introduced in a controlled way until 2001. The DVLA does therefore not hold verifiable CO2 emissions data for older vehicles. Older cars were designed to lower standards and generally pollute significantly more than newer cars.

Cars are generally owned for purpose of driving. When the parked car is driven, it contributes to pollution. All car ownership therefore contributes to pollution, in various amounts. The adoption of lower emission vehicles even amongst parked cars will contribute to improved air quality.

14 respondents (1%) commented:

High charges will put off people visiting Croydon and district high streets.

Officer response:

The parking permit charges proposed in this consultation do not apply or alter the parking charges for visitors to Croydon and the district centres.

A future phase extension to the emission-based parking charges will be consulted on separately.

14 respondents (1%) commented:

Unfair unless the Council contribute to replacing my car. Fund a scrappage scheme.

Officer response:

The Council supports the London Mayor's call for a national scrappage scheme to be funded by central government.

Several manufacturers currently operate scrappage schemes, offering between £2,000 and £6,000 discounts, mainly for diesel cars. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. There is also a national grant available for home charges for plug-in hybrid vehicles.

13 respondents (1%) commented:

Emissions charges are not needed. There is no evidence that congestion and air quality is a concern. The AQI in Croydon is well within EU limits.

12 respondents (1%) commented:

Enough is being done to reduce emissions already and new parking charges are not needed.

Officer response:

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban NOx and particulate matter emissions mainly to a local level. In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants.

Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.

12 respondents (1%) commented:

If the Council is serious about air pollution then it would shut down the Beddington incinerator.

Officer response:

The Council does not consider the emission-based parking proposal to be in conflict to the waste service provided by our contractor, which operates an Energy Recovery Facility in compliance with the Industrial Emissions Directive and regulated by the Environment Agency.

Private car transport is of course just one aspect of local air pollution, but a major aspect of local traffic and parking congestion. Regionally, the London Mayor's targets for car use reduction in outer boroughs are devolved to local levels. Without the introduction of emissions-based parking charges it is

considered that there would be insufficient local measures to influence car ownership and to address the public health concerns locally.

10 respondents (1%) commented:

I object because the scheme is not aligned with ULEZ. Croydon does not exempt pre-2006 vehicles and new vehicles purchased to comply with ULEZ.

9 respondents (1%) commented:

Croydon should adopt the ULEZ congestion charge instead.

3 respondents (<1%) commented:

I object because ULEZ is coming to Croydon in 2 years anyway.

1 respondent (<1%) commented:

Such moves should at least be London wide if not country wide.

Officer response:

The proposed scheme is not the same as the London ULEZ, which is a binary charge and is concerned with moving traffic. The London Mayor does not currently have any plan for extending the ULEZ to Croydon. The Mayor instead requires the outer boroughs to define and implement their own schemes, whether they call it ULEZ or something else and to use measures that are appropriate for local conditions. The aim is a reduction in car ownership and use.

The Central London type congestion charging is very complex and expensive to operate. It would need to be joined up to a London-wide scheme.

Considering that every car journey starts and ends with a parking space, the parking charges structure is considered to be an important means to influencing car ownership and use in Croydon.

Table 2 – 108 grounds for objection or statements of concern, each of which have less than 10 respondents commenting. They are ordered and grouped by subject areas for easier consideration.

Objections and officer's response

2 respondents (<1%) commented:

Paying both the ULEZ in London and emissions permits at home is being charged twice for the same thing.

1 respondent (<1%) commented:

Both Vehicle Excise Duty and Fuel Duty already tax motorists for the CO2 emissions and efficiency. The proposed Croydon charge amounts to double taxation on this basis.

Officer response:

The national or regional taxation schemes alone are insufficient to help stem the number of cars on the roads in Croydon, which has on the latest data, grown 7% since 2013. The purpose of these charges are as detailed in paragraphs 3.1.1 to 3.1.5.

The proposed charges are about regulating context specific car ownership and use – e.g. someone parking in a congested residential street in Croydon does not necessarily drive into Central London and vice versa.

1 respondent (<1%) commented:

Council data shows that the volume of vehicles traversing the “ladder streets” between Addiscombe Rd and Lower Addiscombe Rd exceeds the number of vehicles owned in the area. Imposing parking permit charges is therefore highly unlikely to have a significant impact on pollution levels in the Inner Areas.

1 respondent (<1%) commented:

The claims are not supported by any evidence linking car ownership in the CPZ areas and the levels of pollution. In effect Croydon Council applies a form of “apartheid” in terms of services, charges and quality of life that favours residents of Outer Croydon and supports their life style choices.

Officer response:

The traffic count in the “ladder streets” is undertaken to help address the matter and monitor the effects. It is however wrong to automatically assume that the problem is majority through-traffic. It is well-established that when parking saturation exceeds 85%, then local traffic starts to circulate for finding a vacant parking bay. The Department for Transport quote a study suggesting that the average UK driver spends 90 hours/year (~4 days) searching for parking. Such number varies between locations, but it is reasonable to say that residents and visitors in the “ladder streets” make a not insignificant contribution to the traffic counts. Other respondents to this consultation tell that they too often have to drive around the block until a bay becomes vacant. The high rate of car ownership is a principal contributor to traffic circulation. The emission-based charges alone will not reduce car ownership to a level achieving 85% bays occupancy, to eliminate the needs to search for a space. But even a more modest number of residents choosing the alternative to the

car will be helpful. And, if the vehicles circulating the area on average are lower emission, then this will have a more positive impact in terms of air quality than if that vehicle is of a higher emission.

1 respondent (<1%) commented:

This will reduce car ownership, creating clearer roads for increased through traffic with no net effect on air quality.

Officer response:

The reduction in car ownership will contribute to a reduction in internal traffic and traffic circulating the congested roads in search for a parking space. This will reduce transport related air pollution. Through traffic tends to be confined to the artery roads, as opposed to the internal road network, and it is not considered that arterial volume will increase as a result of introducing emission based parking permit charges and diesel surcharges for permits.

2 respondents (<1%) commented:

This is flawed. You are basing it mostly on CO2 which is harmless to humans.

2 respondents (<1%) commented:

The Council should help suppress NOx, instead of seeking to reduce CO2 emission. Leave CO2 to national and international agencies.

Officer response:

Although there is international consensus that transport related CO2 emissions contribute undesirable greenhouse gasses, they are not the primary focus of the Croydon emissions scheme. Greenhouse gas emissions are subject to international treaties, which in the UK are addressed nationally through various policy measures.

The emissions of concern to local public health are NOx and particulates. NOx emissions correlate to CO2 emissions – i.e. high CO2 emission generally means high NOx emission – except for pre-2015 diesel vehicles for which NOx tended to be significantly higher. CO2 is the only verifiable measure that is held on the vehicle registration document, which is the practical reason for using it as the banding variable.

2 respondents (<1%) commented:

Research shows that broadly half of the harmful air pollution emitted by vehicles comes from particulate matter emitted by brakes and tyres, alongside what is sometimes called "road dust", which can account for

up to 90% of PM10 in certain urban environments. Every car contributes to this air pollution, regardless of fuel type or carbon emissions.

Officer response:

Although there is general consensus that the nation should be concerned about 'road dust', the health effects from particulate matter (PM), and particularly the differences between PM10 and PM2.5 (nb: particulate matter is described by its size or aerodynamic diameter which governs how far it can get into the air passages of the respiratory system), is not well understood. There is on the other hand evidence of a correlation between high NOx emission days and hospital admissions for asthma related exacerbation. NOx and particulates tend to occur together from internal combustion engine road vehicles and are generally considered as a combined problem. The NOx element of this problem, the one confirmed to cause harm, is reduced from lower emission vehicles which is the focus of the proposed changes to parking charges.

The creation and disturbance of 'road dust' relate to car use, which largely relates to car ownership. It is expected that the emission-based parking charges will help to indirectly influence a behaviour change of car use. Many car journeys could easily be walked or cycled instead of driven by car. A subsequent phase will propose emission-based charges in destination parking places, which would further discourage car use – and the creation and disturbance of 'road dust'.

1 respondent (<1%) commented:

The argument that CO2 based parking charge will encourage people to switch to lower emitting vehicles is simply not borne out by the research. The VED was reformed in 2016 to capture the CO2 emissions in the 'first year rate', followed by a flat rate charge, is precisely because research showed that it is up-front price that affects purchase decisions, not the prospect of recurrent charges.

Officer response:

The proposed scheme is aimed at encouraging behaviour change for the next car choice and it will help overcome the inertia held by many owners of high-polluting vehicles, who know it is bad but do not hear enough about the consequences to consider the alternatives. Already at the consultation stage of the current proposal, respondents have commented that they will now give up their car or change to a lower emission model next.

To create a charging structure that mirrors the current Vehicle Excise Duty (VED) model, i.e. by introducing a significantly higher 'first year rate' when owners change vehicles, would most likely be unacceptable to local permit holders. This is because invariably the 'first year rate' will be higher than the previous year's flat 'subsequent rate'. This would easily end up as an

argument for holding out against a switch to lower emissions. Residents need to perceive a reward, not a penalty, from choosing a lower emission vehicle.

1 respondent (<1%) commented:

Why complicate things?

9 respondents (1%) commented:

I have a car, what will it mean to me? How do I calculate the new charge?

6 respondents (1%) commented:

I need more details about the scheme.

5 respondents (<1%) commented:

Visitor permits are becoming too complicated. How will I know the CO2 emission of my visitor's car?

Officer response:

The proposed emissions bands for this authority are a simplification of the VED bands. The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the 5 bands too complex. The number of 5 bands was selected as a best compromise and which many other London Boroughs have also settled for.

The CO2 emission value and the banding is calculated automatically when entering the vehicle registration number, when applying for a permit or recording a visitor. All the driver has to do is to key in the registration number. The system collects the data electronically from the vehicle registration data held at the DVLA.

1 respondent (<1%) commented:

The emission bands should align to the VED bands. It is unfair to group majority of drivers into the increased middle band charge.

1 respondent (<1%) commented:

Proposed bands do not reflect the existing car tax bands. Why complicate things?

1 respondent (<1%) commented:

I object that pre-2001 cars are not banded by engine size.

Officer response:

The proposed emissions bands are a simplification of the VED bands. The VED has two tables of 13 bands and differentials for the first and subsequent years. This would be a complex system to apply to parking permits locally.

The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the 5 bands too complex. The number of 5 bands was selected as a best compromise and one which more other London Boroughs have also settled for.

3 respondents (<1%) commented:

If the car is zero road tax then it should be zero parking charges.

Officer response:

The road tax and parking permit charges address different objectives and cannot be automatically correlated. The national or regional taxation schemes alone are insufficient to help stem the number of cars on the roads in Croydon, which has on the latest data, grown 7% since 2013. The purpose of these charges are as detailed in paragraphs 3.1.1 to 3.1.5. The proposed emission charges in Croydon are about regulating specific car ownership and use – e.g. someone parking in a congested residential street in Croydon does not necessarily drive nationally and vice versa.

2 respondents (<1%) commented:

I object because outside the operating times of a Controlled Parking permit zone, within the London Borough of Croydon, it is currently lawful without any financial payment required, to park most motor vehicles, owned by Residents, Businesses and Visitors of and to our borough, unless causing obstruction of the highway, anywhere and at any other time, on a space which is not a bay, for which a permit is required.

As a consequence of the greed of the council and unrequited cost to all those above, there would obviously be less revenue to Parking Services due to responsible motorists leaving vehicles in such places above, displaced to, for example yellow lines etc.

2 respondents (<1%) commented:

This will cause parking displacement into non-CPZ roads.

Officer response:

The proposed emission-based parking charges do not alter the conditions for where and when a vehicle can park. The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. Parking displacement into non-controlled roads is occurring already and will continue to grow in pace with car ownership. The

proposed emission-based parking permit charges scheme is a long-term measure that will help this, while simultaneously helping to reduce emissions. Parking revenue is not a consideration with the focus on being on behaviour changes.

9 respondents (1%) commented:

Unfair that permit charge will increase for sub-100g/km cars and hybrids, which are just outside Band 2. Raise Band 2 threshold or introduce an intermediate band separating my car from big salon cars.

Officer response:

The upper limit of 75g/km is aligned to the government's low emission Category 1, 2 and 3 car and van grants scheme (www.gov.uk/plug-in-cars-van-grants). Emission Band 2 covers most Plug-in Hybrid Electric Vehicles (PHEV), Range Extended (REX) hybrids and some Mild Hybrid (electrically assisted for a degree of energy saving) vehicle models. The weblink above demonstrates how some large car and van models will qualify for the reduced Band 2 charges.

The number of bands have to balance incentive, fairness and complexity. Other respondents in this consultation in fact find the number of bands too complex. The number of 5 bands was selected as a best compromise and one which more other London Boroughs have also settled for.

3 respondents (<1%) commented:

I drive long distances on motorways, including holidaying in Europe, for which a slow recharging electric car is unsuitable. All electric is not an option for me. The scheme discriminates against me.

Officer response:

The reduced £65 charge band does not preclude certain vehicle models that can be suitable driven for long distances on motorways. Although the recharge time can be an issue for some drivers, it is today not unusual to see vehicles that would fall into the £6.50 band travelling long distances on motorways.

1 respondent (<1%) commented:

Why should a local resident pay an additional charge aimed at curbing congestion or improving air quality when, for instance, parents driving a short school run would escape this charge?

Officer response:

The Council and TfL have a successfully evolving programme on encouraging parents and children out of the school run where it is not necessary; but there are of course many other types of unnecessarily short distance car uses. The prerequisite for short distance driving is that the travelling person has a car in the first instance. It is expected that the emission-based permit charge will help people re-consider non-essential car ownership and use.

In a next phase, currently planned for consultation in 2021, the emission-based parking charges would be extended to destination parking. This will help reduce short distance, high-emission driving to the most parking congested streets.

1 respondent (<1%) commented:

Concern that by being Borough wide the proposals fail to address the particular air pollution problems along and off the London Road running through Norbury & Pollards Hill Ward.

Officer response:

This scheme is an initial phase & is intended to influence an uptake in lower emission vehicles amongst Croydon residents living within CPZs south of Norbury and commuting by car through London Road in Norbury. The subsequent proposed phase of emission-based destination parking charges and the wider public opinions formed by the proposals are also likely to stimulate an uptake in lower emissions amongst car commuters who do not live within a CPZ. The fact that the average emissions from cars travelling through Norbury is being lowered, would help improve air quality along London Road.

The Council is taking parallel measures to discourage the school run, which also contributes to peak time traffic in London Road, with currently proposed School Street restrictions in Abingdon Road, Norbury, and consideration to identifying other candidate schools in the area.

4 respondents (<1%) commented:

The scheme needs to be combined with tree planting initiatives and creation of space for trees, including specifying mature trees as a planning requirement.

Officer response:

The Council has a policy on tree planting, although it is not directly linked to emission-based parking charges. The council's active tree planting program aims to plant 650 trees each year & this year alone it is expected to deliver 1200 trees.

4 respondents (<1%) commented:

This will encourage people to concrete over and park in their front gardens which will have environmental impact.

Officer response:

Restrictions apply to making a pavement cross-overs and hardstandings for parking on private property, and these take into consideration road conditions, dimensions, underground services and surface water effects. The required works to strengthen a foot path and install a pavement cross-over tend to be extensive and, in many cases, may require prior planning consent and the associated cost is significantly higher than a parking permit charge. The Government's Planning Portal states that specific rules apply for householders wanting to pave over their front gardens, such as if the surface to be covered is more than five square metres then planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.

Residents who choose to install pavement cross-overs do so to secure access, not to avoid the permit charge and need to obtain permission from the council to drop the kerb and strengthen the pavement. The emission-based permit charge scheme has potential for helping to reduce the number of cars parked in a road, hence improving access and reducing the incentive for residents to concrete over their front gardens.

1 respondent (<1%) commented:

This will discourage the use of public transport, because people need to drive to the train station and pay to park. Now they will drive to London instead.

Officer response:

The parking permit charges being consulted are not associated with parking charges at train stations.

4 respondents (<1%) commented:

Cycling infrastructure is inadequate to provide an alternative to the car.

1 respondent (<1%) commented:

Why not put money into more cycle lanes instead?

Officer response:

The Council has a cycling strategy and is developing cycling routes. This will be done in addition to encouraging drivers out of the car.

3 respondents (<1%) commented:

Car share infrastructure is inadequate. Why do you not make it easier to park hire cars on an ad-hoc basis.

Officer response:

The Council's planning and transport plans include requirements and objectives for expanding the car share parking infrastructure, to encourage uptake in local schemes.

9 respondents (1%) commented:

It is unfair to introduce for residents first, while businesses and others can wait until later.

Officer response:

The first reason for phasing the residential CPZs first is that they represent the most parking congested streets in the borough. The growing amount of car ownership in the borough places particular pressure on residential CPZ. Many respondents to the current consultation raise concern that permits spaces are oversubscribed. High car ownership in the residential CPZs adds to air pollution, through internal traffic and residents circulating in search for a vacant space.

The second reason is that the technology for introducing emissions-based charges to other payment types and locations will need further development time. For the emissions and car reduction to show their required effects by 2021, the recommended emission-based charges cannot be delayed until all other charging modes are developed.

8 respondents (1%) commented:

This is a big burden on local businesses at already difficult times.

1 respondent (<1%) commented:

I am concerned about levels of traffic and the ability of small and micro businesses to continue in operation.

1 respondent (<1%) commented:

Parking permits are another tax on business with no legitimate benefit to anyone in Croydon. Taxes based on fake science kills business.

Officer response:

Business would become negligibly affected (in the range from positive to negative) by the scheme. There are just 285 business permits in use and each presents an opportunity for a permit charge reduction. The later phase of emissions charges proposed for destination parking comes with new Smart Parking technology, which has potential for better guiding drivers to vacant parking bays. This is designed to reduce congestion and air pollution from cars circulating for space; but it also looks to make the visit easier. The reduced parking difficulties has potential to support traders and businesses in Croydon.

1 respondent (<1%) commented:

Does not address commercial vans parked in residential roads.

Officer response:

The emission-based parking charges are not intended to address this. The new Parking Policy 2019-2022 has an objective for reviewing and addressing the kerb side share between different road user groups.

9 respondents (1%) commented:

Too much stick, not enough carrot. Oppose the increases for the higher bands; but supports the reductions in lower bands, to help reduce emissions.

6 respondents (1%) commented:

Residents should have free permit in CPZs, not emission charges.

7 respondents (1%) commented:

30% increase in band 3 is unreasonable.

4 respondents (<1%) commented:

Give free permits to residents and instead make the income from pay and display.

Officer response:

The decision to recommend emission-based charges is taken in context of demands from the community and over-arching national and regional policy. The differential in the charging bands must be sufficient to encourage low emission and to discourage high emission. Narrowing the charging differential, to lessen the permit charge for high-polluting vehicles, would detract from meeting the decision objectives.

The parking of vehicles needs to be managed as the demands for access exceeds available space in certain areas and furthermore aligns with the Council's duty under the Road Traffic Act 2004 to keep the roads open and kerb side accessible, while securing road safety.

The incentive is naturally present in the individual motivation to make choices in the interest of public health and neighbourly fair parking policy – i.e. not claiming any more than a fair share of the available kerbside space.

The deterrent of the cost will remain a relatively modest element of the total cost of car ownership. It has a symbolic effect, already stimulating a public debate about emissions and choices. The debate that the current proposal has spurred is helpful. This is exemplified by a few of the respondents to the consultation declaring that they will now give up one of their cars. One respondent expresses a thank you to the Council for its decision to encourage the respondent to give up one of the family cars.

1 respondent (<1%) commented:

Why not make a meaningful reduction in pollution by only allocating one parking permit per household?

1 respondent (<1%) commented:

Don't reduce the surcharge for the third residential permit, In fact, you should increase it.

Officer response:

The second permit surcharge is increased by 9% to £50 and the third permit has been withdrawn for new applications. Just 27 third permits now exist in the borough. These third permits are already in process of fading away and the higher surcharge is therefore no longer required.

It is already planning policy that new developments in high intensity areas where good alternative transport exists will have more severely restricted access to on-street parking permits.

1 respondent (<1%) commented:

Unfair on single car households. Restrict the number of cars per household outside CPZs instead.

Officer response:

The CPZ represents a location where residents have reported significant parking congestion and requested that such congestion is managed. Kerb side space is less of a problem outside CPZs. It is not within the Council's authority to restrict cars per household however the current measures are

designed to encourage households to self-select their reduction in car ownership.

1 respondent (<1%) commented:

Second permit surcharge for 2 electric cars is a dis-incentive. It charges the second EV as a gas-guzzler.

Officer response:

The scheme has a two-fold objective, namely to reduce emissions and to reduce the number of cars on the road. An electric vehicle contributes equally to parking congestion in a residential CPZ. Nonetheless, the permit charge for an electric second car would be £56.50, whereas the charge for a gas-guzzling second car would be £350. Where a household essentially need 2 cars, then the incentive remains to make the second car lower emission.

1 respondent (<1%) commented:

I object because we have a number of cars at our home and need to park on the road.

1 respondent (<1%) commented:

This will price one of our cars off the road.

Officer response:

The view conflicts with the comments received from many other residents expressing concerns that too many cars are parked in residential streets. The scheme must balance the needs of all road users.

1 respondent (<1%) commented:

Object because it will cause a switch from diesel to petrol. All recent science shows that diesel engines are environmentally friendlier.

1 respondent (<1%) commented:

Object because the scheme encourages a switch to diesel, due to its lower CO2 emission. Ironically diesel emissions cause more harm.

Officer response:

The national policy on favouring diesel started to progressively reverse in 2009, when the scrappage scheme was also introduced for older cars. According to the Society of Motor Manufacturers and Traders, the growth in the registrations of new diesel cars levelled off in 2015 and has since been in

decline. Diesel currently continue to have a positive role in wider CO2 reduction, in particular for motorway driving where pollution disperses more easily. Older diesel cars, however, contribute disproportionately to NOx in build-up urban areas.

The national Clean Air Strategy 2019 has devolved responsibility for further reducing urban NOx emissions mainly to a local level. The Mayor has introduced ULEZ in Central London and there is a requirement that the outer London boroughs implement local Air Quality Action Plans. NHS data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions from older diesel (and older petrol) cars in Croydon would deprive many local people of their ability to breathe safe air.

Several manufacturers currently operate diesel scrappage schemes, offering between £2,000 and £6,000 discounts. A national grants scheme for electric vehicles currently covers up to 35% (to max £3,500) of a car's price, or 20% (to max £8,000) for vans. This subsidy opportunity is available to owners of older diesel vehicles.

2 respondents (<1%) commented:

Unfair that my single car in band 4 will increase to £146, while a second gas-guzzling car in band 5 will be £96.

Officer response:

A second car in band 5 would attract a £350 permit charge.

1 respondent (<1%) commented:

Why not just keep band 3 at the original permit price of £80 and slowly phase it up to £104.

Officer response:

Many respondents to this consultation have expressed concern over the lack of availability of parking spaces, which would indicate that current levels of parking control measures are not achieving their objectives for managing access. The £80 permit charges set in 2013 are currently too low to influence car ownership and to encourage a switch to lower emission cars.

The national Clean Air Strategy 2019 and the London Mayor's Strategy require further actions to reduce urban NOx emissions mainly to a local level. These actions are required to start showing measurable results by 2021. Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London and 7.5% of premature deaths in Croydon are linked to air pollution. Phasing in the charges more slowly would fail to address NOx and particulate matter

emissions in a timely manner would deprive many local people of their fundamental right to safe air.

1 respondent (<1%) commented:

If a 2009 model of a vehicle is in the same band as a cleaner 2019 model of the same vehicle then the scheme is flawed. There is no incentive to upgrade to a cleaner car.

Officer response:

The proposal has sought to strike a balance in the proposal - too many charging bands and the incentive to change is less; too few and the steps between bands can be more dramatic. The increase from £80 to £104 in the middle band 3, where most cars resides, should encourage owners to consider a model that falls into a lower emission when next choosing a car.

1 respondent (<1%) commented:

Objects because when buying a black cab 4 years ago the emission was determined by requirement to comply with TfL hire license terms.

Officer response:

The vehicle is presumably registered around the time of September 2015 and will be charged as other vehicles with similar emission levels from this time.

2 respondents (<1%) commented:

The charges per band do not increase linearly and too polarised.

Officer response:

They are designed to be non-linear, to help enhance the perception of the differential and more effectively influence car ownership choices.

1 respondent (<1%) commented:

The £50 charge is in not proportionate to the £300 upper CO2 band. Because diesel vehicles tend to have significantly lower CO2 emissions than many petrol vehicles, the likely effect is that people driving around older, dirtier diesels could pay significantly less than those driving newer petrol vehicles. This make no sense from an air quality perspective.

Officer response:

The £50 diesel surcharge applies to pre-September 2015 vehicles only. This date reflects the introduction of a lower NOx emission standard. Although diesel prior to this date may emit less CO2, their NOx emission is not verifiably recorded to the latest low emission standard. Whereas NOx is harmful to local public health, the CO2 greenhouse gas has low direct impact on public health.

8 respondents (1%) commented:

Charges should be based on MOT certificate emission test measurement, not by the vehicle age.

Officer response:

The MOT emissions test measurements can vary according to environmental conditions and how busy the test centre is – i.e. how long it allows for the engine to ‘run in’. Vehicles with emissions in the boundary between 2 charge bands could easily obtain different test results year on year. Also, identical car models may obtain different results at different test centres. Such a system would be open to an annual anxiety and potential disputes – some fairly and some unfairly. The DVLA emission record, although not a reflection of an individual vehicles state of repair, is a constant and is made under more controlled conditions.

4 respondents (<1%) commented:

Unfair to penalise people with cleaner Euro6 diesel engines. How do you differentiate?

Officer response:

Vehicles registered from September 2015 when the Euro6 standard was formally introduced are exempt from the diesel surcharge. The vehicle’s registration document from the DVLA states the date of registration. These vehicles are not differentiated from other vehicles.

1 respondent (<1%) commented:

Petrol cars must also be in the scheme, they pollute the air just the same. Why are they not included?

Officer response:

Petrol cars are in the scheme.

1 respondent (<1%) commented:

The scheme should be extended to charge for car length, where longer cars pay more.

Officer response:

This would be a practically difficult measure. Although the length of a vehicle may relate to parking congestion, it does not universally correlate to air quality.

7 respondents (1%) commented:

Vehicles that make repeat and multiple stop journeys such as busses, taxis, commercial vans and construction traffic cause pollution, not parked cars.

5 respondents (<1%) commented:

Take dirty diesel busses off the road instead.

4 respondents (<1%) commented:

Charge diesel cars only.

5 respondents (<1%) commented:

Emissions reduction should target those who can afford it such as big business replacing cars frequently.

2 respondents (<1%) commented:

Significantly increase business permit charges instead of increasing resident permits.

2 respondents (<1%) commented:

Consider other ways to improve air quality such as review transport links, smart traffic lights, reduce speed humps and reduce one-way systems.

1 respondent (<1%) commented:

Start instead with the biggest polluters not as it appears with the largest pool of payees. Look to the endless building sites with their deliveries, diesel generators, transient work forces. How is their carbon foot print offset? Do they bear any share of the load or are they as investors 'too important'?

1 respondent (<1%) commented:

Alter the flow of traffic away from the most vulnerable instead.

5 respondents (<1%) commented:

In fairness, charge motorcycles, mopeds and cyclists as well.

Officer response:

Becoming a greener borough will not be achieved by any one action. The proposal to introduce emission-based parking charges would form one part of a range of actions that are required at a community, borough, London and national level.

The per-person congestion and emission from a diesel bus passenger is already less than the per person effects from a car driver. Transport for London have a programme for converting busses to electrics by 2030 for further improvements.

5 respondents (<1%) commented:

Charge or regulate the car manufacturers instead, for selling polluting cars.

2 respondents (<1%) commented:

Responsibility should be taken by government and the energy companies to tackle climate change, investing in natural energy (wind/tidal) and closing air polluting coal based per stations.

1 respondent (<1%) commented:

Unfair to be penalised for car brands not being up to scratch with their CO2 emissions.

Officer response:

The suggestion is outside the Council's authority. The Council supports the London Mayor in lobbying for national measures.

1 respondent (<1%) commented:

The Council has created the emission problem because 20mph zones cause congestion and run engines colder, less efficient.

Officer response:

Driving at 20mph is more fuel efficient than driving at 30mph, both in terms of air/road friction and engine temperature.

1 respondent (<1%) commented:

This will force the export of dirty cars to unregulated countries, exacerbating the global problem. Needs a global, not local solution.

1 respondent (<1%) commented:

This will cause sell-off of cars people cannot afford to keep, flooding the market and depressing their sales values.

Officer response:

The Council supports the London Mayor's call for a national scrappage scheme to be funded by central government.

8 respondents (1%) commented:

New replacement vehicles and batteries manufacturing will cause pollution.

2 respondents (<1%) commented:

This will cause consumerism. The manufacturing of replacement cars cause pollution.

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon. National policies are in place to regulate recycling and manufacturing resources use.

2 respondents (<1%) commented:

I rarely drive, but mostly use public transport instead. The new charges will cause me to drive more.

Officer response:

The comment reflects a minority view. The scheme could present an opportunity to replace the car with alternatives, such as car pool.

1 respondent (<1%) commented:

With the prevailing S/W wind at 7m/sec the air in Croydon is completely replaced on average every 29 minutes. This is why the Air Quality Action Plan 2017-22 is totally flawed.

1 respondent (<1%) commented:

Those in the community who are concerned about air quality do not represent the majority of residents and they were deceived by the question not asked.

1 respondent (<1%) commented:

This affects a larger demographic and will not assist residents.

1 respondent (<1%) commented:

There is currently no evidence that air pollution causes asthma; although it is likely to be a 'trigger' and can worsen symptoms.

Officer response:

Air pollution does not immediately disperse. The comments do not accord with NHS public health data, which report links between air pollution and childhood asthma admissions and premature death. Asthma related exacerbation, triggered by air pollution, can be a cause of death.

1 respondent (<1%) commented:

Every car driving on a given stretch of road at a given moment contributes equally to congestion, irrespective of its CO2 emissions. Follow that local residents should foot higher residential parking permits when there is no necessary link between the fact of their car ownership and local congestion.

Officer response:

The introduction of Emission-Based Parking Permit Charges and Diesel surcharges for Permits, are intended to encourage motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead. Such behaviour change would reduce the overall demand pressure as well as help to drive improvements in our public health and air quality objectives

6 respondents (1%) commented:

Object because was never asked when prior survey on air pollution and traffic congestion was conducted. Residents didn't agree to reductions.

2 respondents (<1%) commented:

The council have not carried out proper consultations and do not have a mandate for this.

1 respondent (<1%) commented:

There must have been a study on expected revenue, but it has not been made public.

1 respondent (<1%) commented:

It's a survey so I'm expecting questions so you know my views.

1 respondent (<1%) commented:

I feel more discussion is needed before a decision is made.

Officer response:

The current consultation follows the statutory procedure under the Road Traffic Regulations Act 1984, for inviting and responding to objections to a draft Traffic Management Order. Respondents are able to express their views. More than 100 unique views were received in this consultation.

More open-ended questions, and multiple options with scoring scales, were asked in the prior engagements on air quality in July 2017, on the transportation strategy implementation plan in September 2018 and on the parking policy on emission-based charges in April 2019. These prior engagements have helped define the proposal subject to the current consultation asking for comments and objections.

The revenue and capital consequences together with risks were reported to a Cabinet meeting on 25 March and the report is available as a public record (<https://democracy.croydon.gov.uk/documents/s14463/Parking%20Policy%20report.pdf>). This report provides a 3-year medium term revenue and capital forecast of effect from all permit charges.

3 respondents (<1%) commented:

This will devalue houses and could hinder house sales.

Officer response:

House values are affected by a number of variables, including accessibility and the local environment. The emission-based charges are intended on help improve access and the local environment.

5 respondents (<1%) commented:

It is not the council business to try modify lifestyle and free choice.

1 respondent (<1%) commented:

In a free country parking permits should be easier to obtain and cheaper.

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon by encouraging motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead.

The Council has a duty under the Road Traffic Act 2004 to keep the roads open and kerb side accessible, while securing road safety.

1 respondent (<1%) commented:

I want to understand what you plan to spend the additional tax revenue on? Surely on improving air quality and green space.

1 respondent (<1%) commented:

How can you legally charge me £300 to park in my road?

1 respondent (<1%) commented:

The scheme should only be allowed to recoup the cost of implementation. Introducing the charges is an unlawful use of power.

Officer response:

The Council has a duty under the Road Traffic Act 2004 to secure an effective and efficient road network. Local authorities have powers under the Road Traffic Regulations Act 1984 to use parking charges as a means to manage the parking and traffic objectives, including air quality, which is has the duty to secure.

Any surplus from parking charges are ring-fenced to the purposes set out in section 55 of the RTRA and, for example, contributes significantly to sustaining public transport fare concessions such as the Freedom Pass.

1 respondent (<1%) commented:

I question the legality of using DVLA data to determine the short-term rent on land (vehicle bay).

Officer response:

The parking charge is not a rental fee. It is a charge introduced to manage the use of public highway or land and it implemented in accordance with powers under the Road Traffic Regulations Act 1984. Vehicle model CO2 emission data is public information. The Council will require the permit holder to verifiably provide a vehicle's CO2 emission figure, from the DVLA issued registration document, before being able to issue an emission-based permit.

1 respondent (<1%) commented:

I object because this proposes to charge people for parking in their own driveways.

Officer response:

The scheme is concerned with parking permits for on-street parking within controlled zones. It will not charge car owners for parking on their own driveways. However, there is no automatic right to park on any part of the street or pavement, which constitutes the public Highway.

8 respondents (1%) commented:

Proposed large Westfield car park will cause pollution. Policy is inconsistent.

Officer response:

The Council does not consider the emission-based parking proposal to be in conflict with developing Croydon's commercial centre.

9 respondents (1%) commented:

I have a parking permit and have not received direct notification about this consultation.

5 respondents (<1%) commented:

None of the current permit holders were written to.

3 respondents (<1%) commented:

Letters were not sent to every household about the proposed charges, not every resident was given a chance to voice an opinion.

Officer response:

The statutory requirement for consulting on an amendment to a Traffic Management Order is to advertise a Public Notice in local press, which the Council did on 23 May 2019 as detailed in paragraph 3.3.1. It further advertised the consultation in Your Croydon and extensively on social media. The Council emailed 13,738 past and present permit holders who have provided their address for such communication and wrote letters to the 310 for whom an email address is not held. The recipients immediately started to respond to the online survey. The Council considers that residents affected by the proposals were effectively reached.

2 respondents (<1%) commented:

Survey is limited to 800 characters, I have more to say.

Officer response:

The consultation was not limited to online submissions alone. The Public Notice that was provided on the survey site included the email and postal addresses for making unlimited length comments. Experience, which was validated following the first 582 submissions, shows that 50% of respondents made their comments in less than 300 characters and 80% in less than 500 characters. Of 1,146 responses received, 1,133 were submitted online. 13 respondents that had more to say submitted their responses by email or letter. The longest response accepted was 69,600 characters.

2 respondents (<1%) commented:

My child will become a victim of knife crime on public transport in Croydon if you discourage me from driving them.

Officer response:

Compared to other London boroughs, violence, particularly youth violence and weapon enabled violence in Croydon has been falling at a greater rate in 2018/19 compared to the London average. The borough's new Violence Reduction Network will build on this success, adopting what is known as a 'public health' approach to tackling crime. This means local agencies such as the council, police, health services, and voluntary and community groups, working together to tackle the root causes of crime, addressing issues such as poverty, education, health and housing.

The Council is also serious about child road safety. Children in cars can also be harmed in driving incidents and from air pollution.

2 respondents (<1%) commented:

Charges will have an unacceptable impact on blue badge holders.

1 respondent (<1%) commented:

Charity permit is not currently vehicle specific. Charities are now forced to purchase the highest band to cover all eventualities.

Officer response:

The Blue Badge, its companion badge and non-vehicle specific charity badges for volunteers who visit vulnerable residents are exempt from parking charges under the proposed Traffic Management Order in the same manner which they historically were. This will not change under current proposals.

2 respondents (<1%) commented:

Will Council and NHS vehicles get taxed as well?

Officer response:

The permits established for public services, healthcare professionals and community care charities permit parking in all zones. They can tend to involve extensive car travel across the borough and it is important to still encourage the relevant organisations to choose lower emission vehicles. The Council and NHS service functions are therefore also charged according to emission levels as other permit holders.

1 respondent (<1%) commented:

I need to drive in my job to provide essential healthcare to children with asthma. Unfair that I have to pay for my parking.

Officer response:

If the essential role is performed in a professional capacity, then it would be reasonable to expect the employer to pay the Community Care permit. If the essential role is performed in a voluntary capacity, then a substantially discounted charity permit is, subject to application and qualification for such a permit, available.

1 respondent (<1%) commented:

This will disproportionately hit the poorer North of the borough.

Officer response:

Permits apply where residents have requested controlled parking, due to parking congestion. Although the concentration of traffic tends to be higher in the North of the borough, CPZs are in fact distributed throughout the borough.

2 respondents (<1%) commented:

This will discourage visitors to residents.

Officer response:

The visitor permit scheme would operate as previously, but applying a -90% reduction on lowest emission vehicles and a +30% increase for the top band vehicles. This differential is less than for other permit types. The charge is calculated automatically when keying the visitor's vehicle registration number into the mobile permit app.

1 respondent (1%) commented:

CPZs should be significantly expanded.

Officer response:

The emission-based charges are not concerned with expanding the CPZs. The Council generally introduce a CPZ where residents have requested it in response to concerns regarding parking issues.

1 respondent (<1%) commented:

You are the only borough as far as I know who charges for parking 24/7, not even in central London.

Officer response:

The purpose of introducing the emissions based parking permit charges and diesel surcharges is to address the issue of air pollution by putting in place measures that will help to achieve better air quality and improve public health in Croydon by encouraging motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead.

The majority of charged parking in the Borough is in on-street parking bays which are mainly shared between permit holders and Pay & Display / Pay by Phone users. This maximises flexibility for drivers ensuring that there are opportunities for visitors and customers to local businesses whilst giving priority to resident permit holders. Charges are a necessity in meeting supply and demand.

The introduction of emissions based parking charges for on-street bays and public car parks is still being developed and when proposals are at an appropriate stage they will be open for public consultation.

1 respondent (<1%) commented:

There isn't enough parking on the council estate and you have not made it clear what the new charges will be for council estates.

Officer response:

Parking places in private and public housing estates are not subject to the Traffic Management Order being consulted on. Parking on housing estates is normally managed by the landlord.

1 respondent (<1%) commented:

Collect emission-charges from council tax instead.

Officer response:

The idea could have merit, but is too complicated for a timely solution. There would need to be a way to affirmatively tie a vehicle to an address.

- 3.3.5 The statutory consultation is primarily concerned with inviting opposing comments and objections. Parking permit holders and the wider public were notified extensively about the consultation. It must be considered that although the scheme will impact on 10,636 parking permit holders, only 1,039 have expressed objections or concerns. The other roughly 90% of permit holders are by default mostly indifferent, unconcerned, in agreement or otherwise unperturbed by the scheme.
- 3.3.6 Of those respondents opposing the increase in parking charges, many have simultaneously acknowledged that air pollution and parking congestion should be addressed. Only a comparatively small number of respondents say that air pollution and parking congestion is not a problem and does not need addressing. This agrees with findings from past engagements, in which a majority of Croydon residents recognise a need to address air pollution and the number of cars on the road.
- 3.3.7 In light of the comments and objections received and the matters detailed within this report, it is considered that the reasons for introducing emissions-based parking charges outweighs the reasons for not implementing them.
- 3.3.8 In conclusion, the consultation has not identified sufficient or material objections that would invalidate the objectives for introducing emission-based parking charges.
- 3.3.9 Subject to the Executive Director, Place agreeing to proceed with the emissions based charges as proposed, each of the objectors will receive one or more responses based on the officer comments in Table 1 or 2, to address the total subject matter in the individual objection.

3.4 IMPLEMENTATION

- 3.4.1 Subject to the Executive Director Place agreeing to proceed with the emissions based charges as proposed, Parking Services will work with their software supplier to upgrade the online permit application, review, printing and issuing

processes. This work has commenced, with the detailed specification for the works already completed. The commitment to the expenditure with the software developer can only be committed to following an affirming decision.

It is considered feasible to have the new resident permit module ready for testing and work processes development by 1 September 2019. This presents a tight but achievable turnaround in debugging and training staff in the revised processes in readiness for 1 October 2019.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Implementing the recommendations of this report will commit the Council to £38k Capital expenditure over the next two years for the purchase of equipment and approximately £110k revenue expenditure each year to fund three new employee posts to deliver the service. The capital expenditure will be funded via a bid to Growth Board, the revenue expenditure will be wholly funded from the revenue generated from the emission-based permit sales.

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20	2020/21	2021/22	2022/23
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	54	110	112	114
Income	(65)	(185)	(274)	(247)
Remaining budget	<u>(11)</u>	<u>(75)</u>	<u>(162)</u>	<u>(133)</u>
Capital Budget available				
Expenditure	0	0	0	0
Effect of decision from report				
Expenditure	28	10	0	0
Remaining budget	<u>28</u>	<u>10</u>	<u>0</u>	<u>0</u>

2 The effect of the decision

The emission-based charges will be introduced in phases, anticipated to commence in October 2019. The new charges are applied at the time of

renewal only – i.e. will have half effect over the first 12 months following introduction. The year 2019-2020 income effect from emission-based charges will be about £65k. The year 2020/21 considers the continued renewals of resident permits and introduction of other permit types and diesel surcharges, again on a gradually ramping renewal basis.

The following table details the revenue forecast by the different categories of parking charges. The table should be read in context of the number of permits issued in each category (see section 3.1.8).

	2019/20	2020/21	2021/22	2022/23
Resident permits	(65)	(120)	(124)	(113)
Visitor permits (days)	0	0	0	0
Business permits	0	(2)	(4)	(3)
Other permits	0	(41)	(91)	(82)
Diesel surcharge	0	(23)	(54)	(48)

The costs of implementing the new charging structure will become operationally self-financing.

The emission-based charges for on-street and off-street parking places remains to be developed and consulted on at a later date.

3 Risks

As permit holders switch cars to lower emission bands it will affect a reduction in revenue generated. The discounting for lower emission bands is non-linear, meaning that a, say, 5% switch into the lowest band will have greater than 5% revenue reduction effect. The forecasted reduction in revenue between 2021/22 and 2022/23 reflects a set of assumptions about changes in car ownership behaviour. The changes in car ownership will be gradual and it is presently impossible to reliably forecast the effects. The change can however be assumed to be gradual over multiple years, as opposed to sudden and immediately significant. This affords for timely adjustments to the policy and charges be made, if and when necessary.

4 Options

The required capital expenditure of £28k in 2019/20 and £10k in 2020/21 will be funded via a bid to Capital Growth.

5 Future savings/efficiencies

The later phases of emission-based charges include the development of new approaches and the adoption of new technologies, which are expected to be less resource demanding, more efficient approach to parking management

6 *Approved by, Kate Bingham, Head of Finance on behalf of the Director of Finance, Investment and Risk and S151 Officer.*

5 COMMENTS OF THE SOLICITOR TO THE COUNCIL

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.
- 5.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.
- 5.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-
- the desirability of securing and maintaining reasonable access to premises.
 - the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - the national air quality strategy.
 - 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.
 - any other matters appearing to the Council to be relevant.
- 5.4 The High Court has confirmed that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 5.5 Finally it should be noted that the Courts have been clear that the Road Traffic Regulation Act 1984 is not a fiscal measure and does not authorise a local authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 5.6 When designating and charging for parking places the authority should be governed solely by the section 122 purpose. There is in section 45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in

section 122 (broadly referred to as “traffic management purposes”). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to “restrain” competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising section 55(4) revenue.

(Approved by, Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer)

6 HUMAN RESOURCES IMPACT

- 6.1 The changes and perceived complexity with the emission-based charges will increase the number of enquiries and processes involved in the issuance of parking permits. A review of the activity index calculates that 3 additional FTE posts will be required initially, to enable the introduction of emission-based permits. This number can be reduced over 12 to 18 months, as the transitions from the old to the new charging structure has settled and the self-service portal has been fully upgraded. The posts must be in place at least 1 month in advance of the new charging structure commencing, while capacity for completing prior induction and training exists.
- 6.2 There will be an HR impact in terms of recruitment and this will be managed under the Council’s policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place & GSE on behalf of Sue Moorman, Director of HR

7 EQUALITIES IMPACT

- 7.1 An Equality Analysis (EA) has been undertaken and was reviewed in response to the consultation. Of the respondents to the Parking Charges section, the disabled group showed some elevated level of concern for parking charges and some concern about insufficiency in the parking bays accessible for the disabled. Disabled Blue badges and disabled companion badges are both exempt from these charges. In Croydon there are 11,459 individual and 71 organisational blue badges. The EA concludes that we will adopt either the Disabled Parking Accreditation or London Plan, whichever is the highest standard for the provision of disabled parking bays various locations.

Approved by: Yvonne Okiyo, Equalities Officer

8 ENVIRONMENTAL IMPACT

- 8.1 The emission-based parking charges are designed to contribute to the Air Quality Actions Plan.

9 CRIME AND DISORDER REDUCTION IMPACT

- 9.1 There are no foreseeable impacts on this.

10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 10.1 There are currently insufficient borough level measures and tools in place to address specific areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.
- 10.2 Although the proposed charges will impact on 10,636 parking permit holders, only 1,039 have expressed objections or concerns during the consultation period. The other roughly 90% of permit holders are by default mostly indifferent, unconcerned, in agreement or otherwise unperturbed by the scheme.
- 10.3 In light of the comments and objections received during the consultation period and the matters detailed within this report, it is considered that the reasons for introducing emissions-based parking charges outweighs the reasons for not implementing them.
- 10.4 It is the recommendation of officers that emission-based parking permit charges and diesel surcharges for permits (as detailed in Appendix 1) be introduced as a measure to help address air pollution.
- 10.5 The statutory procedure is to respond to objections to inform the objectors of the above decision and reasons.

11 OPTIONS CONSIDERED AND REJECTED

- 11.1 The alternative option of not implementing emission-based parking charges would result in the Council failing to meet its obligations under nationally and regionally devolved responsibilities to improve the borough's air quality and public health objectives. Nor would we be able to achieve the Council's obligations under the Mayor's Transport Strategy to reduce car dependency and other objectives such as reduced traffic.
- 11.2 An option could be to wait and see if national and regional drivers alone are enough to make a difference in improving air quality for Croydon but realistically this would take far longer to achieve any significant improvements and in light of an estimated 205 deaths a year in Croydon are attributable to air pollution, this is not a viable option.

CONTACT OFFICER:

- Steve Iles, Director of Public Realm;
- Anupa Patel, Head of Strategic Projects;
- Sarah Randall, Heading of Parking Services.

APPENDICES TO THIS REPORT

- Appendix 1 – Proposed emission-based parking permit charges and diesel surcharges for permits for approval
- Appendix 2- Public Notice, displaying the emission-based parking charges structure.

BACKGROUND PAPERS:

- Equalities Analysis for Parking Policy (July 2019).
- Total responses to the Emission-Based Parking Charges Consultation - Anonymised Objections

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APPENDIX 1

Residents parking permits (annual, 12 months) – From October 2019

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6.50	£80
	Band 2	1 – 75	£65	
	Band 3	76 – 165	£104	
	Band 4	166 – 225	£146	
	Band 5	>225	£300	
Before March 2001	n/a	n/a	£300	
Surcharge for a second permit at the same address, whatever the charging band.			£50	£46
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£225

* Implemented on a renewal basis. First time permit admin fee applies. The third residents permit is no longer available for new permit applications. The third permit is available on a renewal basis only.

Business parking permits (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£50	£382
	Band 2	1 – 75	£100	
	Band 3	76 – 165	£400	
	Band 4	166 – 225	£500	
	Band 5	>225	£750	
Before March 2001	n/a	n/a	£750	
Surcharge for a second permit at the same address, whatever the charging band.			£50	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£178
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£500	£528

* Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

Business parking permits (quarterly, 3 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£16	£123
	Band 2	1 – 75	£32	
	Band 3	76 – 165	£130	
	Band 4	166 – 225	£160	
	Band 5	>225	£240	
Before March 2001	n/a	n/a	£240	
Surcharge for a second permit at the same address, whatever the charging band.			£16	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£48	Nil
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£160	Nil

* Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

Diesel surcharge on parking permits – From April 2020

Date diesel vehicle registered	Proposed new surcharge (1/2 day)	Proposed new surcharge (3 months)	Proposed new surcharge (6 months)	Proposed new surcharge (12 months)	Pre-existing charge
From September 2015	Nil	Nil	Nil	Nil	Nil
Before September 2015	£0.50	£16	£30	£50	Nil

* The diesel surcharge is applied to any permit type, new application or renewal, whatever the charging band and in addition to any other surcharges already being applied.

Resident's visitor permit (half day) for inner zones (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.30	£2.00
	Band 2	1 – 185	£2.00	
	Band 3	>185	£3.00	

Before March 2001	n/a	n/a	£3.00	
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* Diesel surcharge also applies.

Resident's visitor permit, (half day) for outer zones (i.e. all permit zones within Croydon not listed above) – **From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.20	£1.30
	Band 2	1 – 185	£1.30	
	Band 3	>185	£1.90	
Before March 2001	n/a	n/a	£1.90	

* Diesel surcharge also applies.

All Zones on and off-street parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£100	£980
	Band 2	1 – 75	£300	
	Band 3	76 – 165	£1,000	
	Band 4	166 – 225	£1,300	
	Band 5	>225	£1,600	
Before March 2001	n/a	n/a	£1,600	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street annual permit, which is being withdrawn.**

All Zones on and off-street parking permit (half year, 6 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£500
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street six month permit, which is being withdrawn.**

Doctor's bay parking permit, initial (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£400
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Doctor's bay parking permit, subsequent (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6	£40
	Band 2	1 – 75	£18	
	Band 3	76 – 165	£60	
	Band 4	166 – 225	£78	
	Band 5	>225	£96	
Before March 2001	n/a	n/a	£96	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Community Care parking permit (half year, 6 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£30	Nil*
	Band 2	1 – 75	£90	
	Band 3	76 – 165	£300	
	Band 4	166 – 225	£390	
	Band 5	>225	£480	
Before March 2001	n/a	n/a	£480	

* This new permit replaces the Neighbourhood Care (NHS) and Council (Social Care etc.) Permits. Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Statutory Undertaker parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£480
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Charity parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£10	£80
	Band 2	1 – 75	£25	
	Band 3	76 – 165	£85	
	Band 4	166 – 225	£105	
	Band 5	>225	£160	
Before March 2001	n/a	n/a	£160	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

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PUBLIC NOTICE

CROYDON COUNCIL

PROPOSED CHANGES TO THE STRUCTURE OF CHARGES FOR PARKING PERMITS IN CONTROLLED PARKING PERMIT ZONES

The Croydon (Parking Places) (Further Provisions) (No. K16) Order 2019

1. NOTICE IS HEREBY GIVEN that Croydon Council propose to make the above Traffic Order under the relevant sections of the Road Traffic Regulation Act 1984, as amended by the Traffic Management Act 2004 and all other enabling powers.
2. **The general effect of the Order would be:-**
 - a) to introduce emissions based charges for all parking permits and a diesel surcharge, as detailed in the Schedule to this notice, which would apply throughout all Controlled Parking permit zones within the London Borough of Croydon.
 - b) to amend existing Traffic Management Orders to include the new charges.
3. Copies of the proposed Order, of all related Orders and of the Council's statement of reasons for proposing to make the Order, can be inspected from 9am to 4pm on Mondays to Fridays inclusive until the last day of a period of six weeks beginning with the date on which the Orders were made or, as the case may be, the Council decides not to make the Orders, at the Enquiry Counter, 'Access Croydon' Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.
4. Further information may be obtained by telephoning Parking Services, Place Department, telephone number: 020 8726 7100.
5. Persons desiring to object to the proposed Order should make a statement in writing of their objection and the grounds thereof on the "Have your say" page at www.croydon.gov.uk. Alternatively write to the Parking Design Section, Place Department, 6th Floor, Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or email Parking.Design@croydon.gov.uk quoting the reference PD/CH/K16 by 20 June 2019.
6. The Order is intended to introduce emissions based parking permit charges and a diesel surcharge. The changes are intended to encourage motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles, helping to drive improvements in our public health and air quality objectives and achieve a cleaner and more sustainable environment.

Dated this 23 May 2019

Mike Barton,

Highway Improvements Manager,

Place Department

Residents parking permits (annual, 12 months) – From October 2019

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6.50	£80
	Band 2	1 – 75	£65	
	Band 3	76 – 165	£104	
	Band 4	166 – 225	£146	
	Band 5	>225	£300	
Before March 2001	n/a	n/a	£300	
Surcharge for a second permit at the same address, whatever the charging band.			£50	£46
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£225

* Implemented on a renewal basis. First time permit admin fee applies. The third residents permit is no longer available for new permit applications. The third permit is available on a renewal basis only.

Business parking permits (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£50	£382
	Band 2	1 – 75	£100	
	Band 3	76 – 165	£400	
	Band 4	166 – 225	£500	
	Band 5	>225	£750	
Before March 2001	n/a	n/a	£750	
Surcharge for a second permit at the same address, whatever the charging band.			£50	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£150	£178
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£500	£528

* Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

Business parking permits (quarterly, 3 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£16	£123
	Band 2	1 – 75	£32	
	Band 3	76 – 165	£130	
	Band 4	166 – 225	£160	
	Band 5	>225	£240	
Before March 2001	n/a	n/a	£240	
Surcharge for a second permit at the same address, whatever the charging band.			£16	Nil
Surcharge for a third permit at the same address, whatever the charging band. [note*]			£48	Nil
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]			£160	Nil

- * Implemented on renewal basis. First time permit admin fee applies. The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

Diesel surcharge on parking permits – From April 2020

Date diesel vehicle registered	Proposed new surcharge (1/2 day)	Proposed new surcharge (3 months)	Proposed new surcharge (6 months)	Proposed new surcharge (12 months)	Pre-existing charge
From September 2015	Nil	Nil	Nil	Nil	Nil
Before September 2015	£0.50	£16	£30	£50	Nil

- * The diesel surcharge is applied to any permit type, new application or renewal, whatever the charging band and in addition to any other surcharges already being applied.

Resident's visitor permit (half day) for inner zones (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones) – **From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.30	£2.00
	Band 2	1 – 185	£2.00	
	Band 3	>185	£3.00	
Before March 2001	n/a	n/a	£3.00	

* Diesel surcharge also applies.

Resident's visitor permit, (half day) for outer zones (i.e. all permit zones within Croydon not listed above) – **From April 2020**

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£0.20	£1.30
	Band 2	1 – 185	£1.30	
	Band 3	>185	£1.90	
Before March 2001	n/a	n/a	£1.90	

* Diesel surcharge also applies.

All Zones on and off-street parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£100	£980
	Band 2	1 – 75	£300	
	Band 3	76 – 165	£1,000	
	Band 4	166 – 225	£1,300	
	Band 5	>225	£1,600	
Before March 2001	n/a	n/a	£1,600	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street annual permit, which is being withdrawn.**

All Zones on and off-street parking permit (half year, 6 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£500
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies. **This permit replaces the All-Zones on-street six month permit, which is being withdrawn.**

Doctor's bay parking permit, initial (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£400
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Doctor's bay parking permit, subsequent (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£6	£40
	Band 2	1 – 75	£18	
	Band 3	76 – 165	£60	
	Band 4	166 – 225	£78	
	Band 5	>225	£96	
Before March 2001	n/a	n/a	£96	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Community Care parking permit (half year, 6 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£30	Nil*
	Band 2	1 – 75	£90	
	Band 3	76 – 165	£300	
	Band 4	166 – 225	£390	
	Band 5	>225	£480	
Before March 2001	n/a	n/a	£480	

* This new permit replaces the Neighbourhood Care (NHS) and Council (Social Care etc.) Permits. Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Statutory Undertaker parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£60	£480
	Band 2	1 – 75	£180	
	Band 3	76 – 165	£600	
	Band 4	166 – 225	£780	
	Band 5	>225	£960	
Before March 2001	n/a	n/a	£960	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Charity parking permit (annual, 12 months) – From April 2020

Date vehicle registered	Charge Band	CO2 emission (g/km)	Proposed new charge	Pre-existing charge
From March 2001	Band 1	<1	£10	£80
	Band 2	1 – 75	£25	
	Band 3	76 – 165	£85	
	Band 4	166 – 225	£105	
	Band 5	>225	£160	
Before March 2001	n/a	n/a	£160	

* Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

PUBLIC NOTICE END

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 24 JULY 2019
SUBJECT:	CECIL ROAD AND AURELIA ROAD – RESULTS OF INFORMAL CONSULTATION ON THE PROPOSED CHANGE OF HOURS OF AN EXISTING CONTROLLED PARKING ZONE (CPZ)
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Environment, Transport and Regeneration (job share)
WARDS:	West Thornton
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough’s roads as detailed in:</p> <ul style="list-style-type: none"> • Croydon Local Plan Feb 2018 • The Local Implementation Plan; 3.6 Croydon Transport policies • Croydon’s Community Strategy; Priority Areas 1, 3, 4 and 6 • The Croydon Plan 2nd Deposit; T4, T7, T35, T36, T42 and T43. • Croydon Corporate Plan 2015 – 18 • www.croydonobservatory.org/strategies/ 	
FINANCIAL IMPACT:	
These proposals can be contained within the available budget.	
FORWARD PLAN KEY DECISION REFERENCE NO.: n/a	
1. RECOMMENDATIONS	
That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that he:-	
1.1	Consider the responses received to the informal consultation on the proposed change of hours in the existing West Thornton CPZ in Cecil Rd and Aurelia Rd.
1.2	Agree for the reasons detailed in this report, to proceed with formal consultation regarding the proposed change the operational hours in the West Thornton CPZ (drawing no.PD-396) to 8am – 8pm, Monday - Sunday.
1.3	If formal consultation is agreed, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give the notice.

- | |
|--|
| <p>1.4 Agree that the results of the formal consultation are reported to this Committee in order for it to make appropriate Recommendations to the Cabinet Member for Environment, Transport and Regeneration (job share).</p> |
|--|

2 EXECUTIVE SUMMARY

- 2.1 This report considers the results of the informal consultation on the proposed change of restriction hours of an existing West Thornton CPZ (Controlled Parking Zone) in Cecil Road and Aurelia Road.
- 2.2 It is recommended that the Council proceeds to the formal consultation stage to amend the operational hours of the West Thornton CPZ as shown on drawing no.PD-396.
- 2.3 On 24 June 2019 and pursuant to the delegation from the Leader dated 6 June 2016, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to refer consideration of the matters detailed paragraph 1.2 above to the Traffic Management Advisory Committee for onward recommendation and determination to the Cabinet Member for Environment, Transport and Regeneration (job share).

3 DETAIL

- 3.1 A petition was received last year from residents of Cecil Road requesting that the existing controlled parking zone operational period change from 9am to 5pm, Monday to Saturday **to** 8am to 8pm, Monday to Sunday to help improve parking conditions during the evening and on Sundays.
- 3.2 After 5pm there is currently a lack of available parking due to parking mainly associated with residents living outside the zone such as those of Mitcham Road. This is causing problems in the area and residents are finding that they frequently are unable to park close to their home due to space being occupied by non-permit vehicles after 5pm when the parking controls end and on Sundays.
- 3.3 In May 2019, 216 sets of consultation documents which comprised of a letter, explaining the reasons for the consultation, a plan of the consultation area, a Frequently Asked Questions factsheet and a questionnaire were sent to addresses within the existing CPZ area. A total of 82 questionnaires were returned, representing a 38% response rate which is considered a good response for an informal consultation exercise of this type.
- 3.4 The table overleaf shows in detail the road by road responses to both Questions 1 and 2 as part of the informal consultation.

Street Name	No. of responses	Are you in favour of change of hours in the existing CPZ?			
		Yes - change the hours Mon-Sun 8am-8pm		No – keep the existing arrangement	
Aurelia Road	19	8	42%	11	58%
Cecil Road	63	48	76%	15	24%
TOTAL	82	56	69%	26	31%

3.5 Overall, the majority of respondents 56 (69%) indicated that they were in favour of the change of hours. 26 (31%) did not support the change of hours to Monday to Sunday 8am to 8pm.

3.6 Some of the comments made by residents on the questionnaire included:

- We have parking problems during the evening, I cannot find a parking space when I return home from work.
- As a permit holder 9am to 5pm is not beneficial to me as I am at work. I would prefer 8am to 8pm Monday to Sunday.
- A good idea. People pay for permits and come back from work after 5pm and cannot get parking spaces, which isn't fair.
- Please introduce 8am to 8pm as soon as possible.
- The existing parking arrangements are sufficient and enable family to visit outside the parking restrictions currently set.
- The current scheme does not cater for residents returning home from work.
- The RingGo system used by the Council is quite complicated to use.
- Please consider one way working in this area.
- In our view we do not require additional parking restrictions for 12 hours a day for 7 days a week, 8am to 8pm. Please do not bring the new proposed scheme into effect.
- Please change to 8am to 8pm Monday to Sunday, we live in Cecil Road and most of the time we can't get a parking space even though we paid £80 per year.

3.7 The purpose of the consultation was to determine support for longer parking controls (Monday to Sunday, 8am to 8pm) which would provide more priority parking during the evening for residents returning home from work. Cecil Road and Aurelia Road are close to part of the North Permit Zone in roads on the east side of Thornton Road (Sutherland Road area) where controls currently operate 8am to 8pm, Monday to Sunday and the Keston Road area where similar controls are to be introduced in October 2019.

3.8 Due to the support for increasing controls in Cecil Road and Aurelia Road and the fact that the existing part of the North Permit Zone in the Sutherland Road

area and new controls being introduced in the Keston Road area operate between 8am and 8pm, Monday to Sunday it is proposed to increase controls to these times subject to formal (statutory) consultation.

4 STATUTORY CONSULTATION

- 4.1 The legal process requires that formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement this Council also fixes street notices to lamp columns in the vicinity of the proposed scheme and writes to occupiers who are directly affected to inform as many people as possible of the proposals.
- 4.2 Official bodies such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted under the terms of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Additional bodies, up to 27 in total, are consulted depending on the relevance of the proposals.
- 4.3 Once the notices have been published the public has 21 days to comment or object to the proposals. If no relevant objections are received, subject to agreement to the delegated authority sought by the recommendations, the Traffic Management Order is then made. Any relevant objections received following the giving of public notice will be considered by the Executive Director of Place and may be referred to the Traffic Management Advisory Committee if the Executive Director in consultation with the Cabinet Member for Transport and Environment considers it appropriate for any other reason.

5 FINANCIAL CONSIDERATIONS

The required capital expenditure will be funded via an allocation within the TfL LIP grant funding allocated to Croydon for 2019/20. Total funding of £75k is included for controlled parking schemes in 2019/20. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would be funding of £57k remaining in 2019/20.

5.1 Revenue and Capital consequences of report recommendations

	Current Financial Year 2019/20	M.T.F.S – 3 year Forecast		
		2020/21	2021/22	2022/23
The effect of the decision	£'000	£'000	£'000	£'000
<u>Revenue Budget</u>				
available				
Expenditure	0	0	0	0
Income	0	0	0	0
<hr/>				
<u>Capital Budget</u>				
available				
Expenditure	75	0	0	0
<u>Effect of Decision</u>				
<u>from report</u>				
Expenditure	3	0	0	0
Remaining Budget	<hr/> 72 <hr/>	<hr/> 0 <hr/>	<hr/> 0 <hr/>	<hr/> 0 <hr/>
<u>Effect of Decision</u>				
<u>from Report</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	<hr/> 0 <hr/>	<hr/> 0 <hr/>	<hr/> 0 <hr/>	<hr/> 0 <hr/>

5.2 The effect of the decision

5.2.1 The cost of amending the West Thornton CPZ has been estimated at £3,400. This includes the supply and installation of signs, lines, amendments to the Pay by Phone system and a contribution towards the legal costs.

5.2.1 These costs can be contained within the available capital budgets for 2019/20.

5.3 Risks

5.3.1 The current method of introducing parking controls is very efficient with the design and legal work being carried out within the department. The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements

5.4 Options

5.4.1 Alternative options include different hours of operation but in order to introduce some consistency and avoid driver confusion it is considered that the 8am to 8pm, Monday to Sunday controls, matching the nearby Sutherland Road area, is the most appropriate option.

5.5 Savings/ future efficiencies

5.5.1 Extending the hours of operation will have the effect of increasing income although this would very much depend on the number of drivers using the Pay by Phone method of payment outside the current 9am to 5pm, Monday to Saturday period which is difficult to estimate.

5.6 *Approved by: Kate Bingham, Head of Finance, Place Department.*

6. COMMENTS OF THE SOLICITOR TO THE COUNCIL

6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

6.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations

made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

6.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-

- The desirability of securing and maintaining reasonable access to premises.
- The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- The national air quality strategy.
- 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.
- Any other matters appearing to the Council to be relevant.

6.4 The Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

6.5 *Approved by: Sandra Herbert, Head of Litigation and Corporate law on behalf of the Director of Law and Governance and Deputy Monitoring Officer.*

7. HUMAN RESOURCES IMPACT

7.1 Enforcement of extended parking controls will require increased enforcement duties by Civil Enforcement Officers. It is anticipated that this additional enforcement can be undertaken using existing resources.

7.2 *Approved by: Jennifer Sankar, Head of HR for Place on behalf of Sue Moorman, Director of HR.*

8. CUSTOMER IMPACT

8.1 The introduction of the proposed restriction hours of the existing CPZ into Aurelia Road and Cecil Road is proposed in response to support from local residents for controlled parking.

8.2 Occupiers of all residential and business premises in the area were consulted to ensure that all those directly affected by the proposals were given the opportunity to give their views. The proposals are made with a view to improving residents' ability to park nearer to their homes.

8.3 There will be an opportunity at the formal consultation stage for members of the public to comment or object to the proposals and any material objections will be responded to in a report which may be considered by this committee.

9. EQUALITIES IMPACT

9.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required. Specific equalities issues which may be raised as part of the formal consultation will be referenced within the officers' response to those objections within the body of a future report.

10. ENVIRONMENTAL IMPACT

10.1 The parking controls which were introduced into Cecil Road and Aurelia Road last year have resulted in far easier street cleaning and a general improvement in the environment in these roads. Extending the controls into the evening and on Sundays should improve street cleaning opportunities further.

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 Evening and Sunday patrols in these two roads should have a positive effect on reducing crime levels.

12. REASONS FOR RECOMMENDATIONS

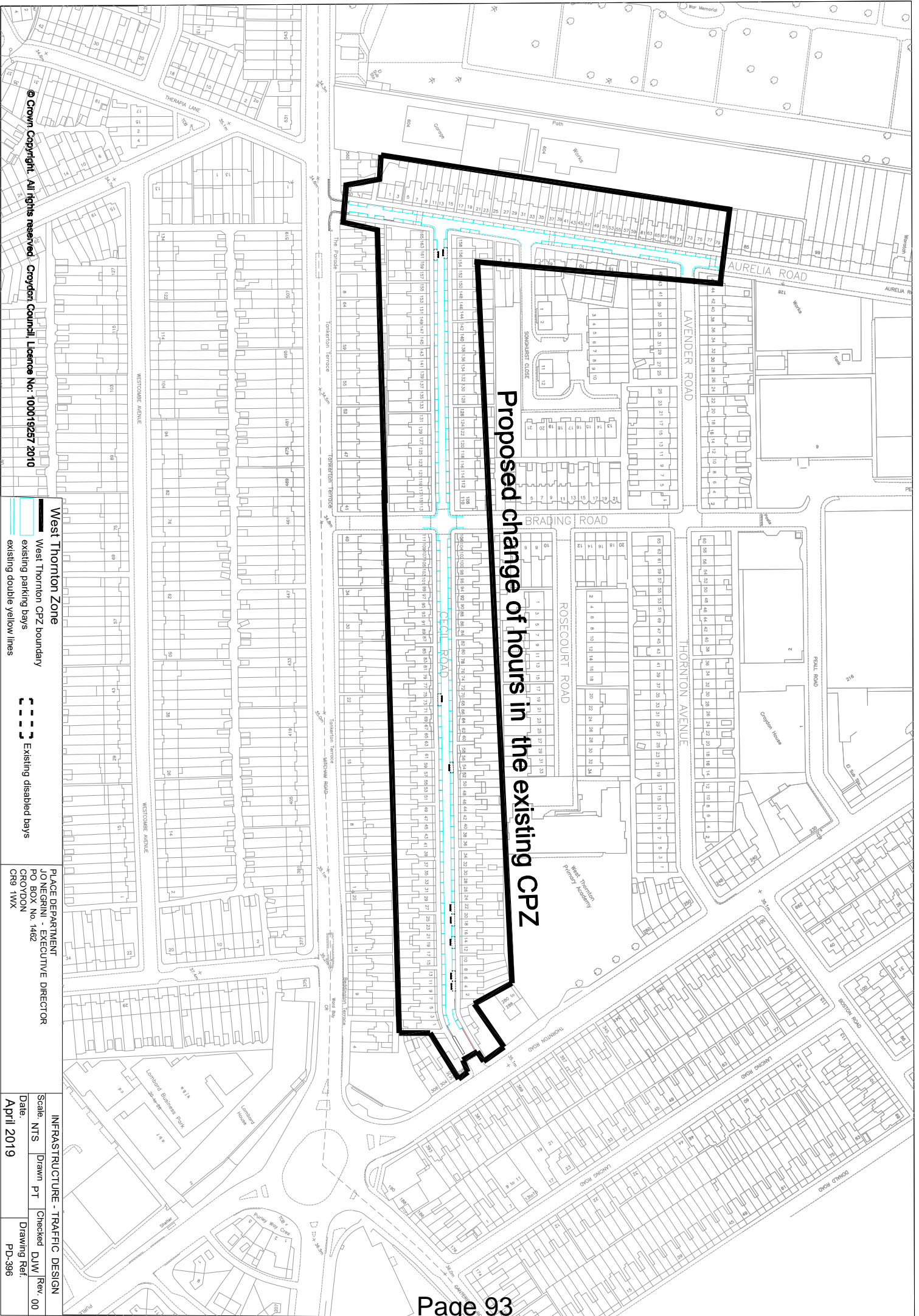
12.1 The recommendations are to change the existing Controlled Parking Zone hours from Monday to Saturday 9am to 5pm to Monday to Sunday 8am to 8pm in Aurelia Road and Cecil Road as requested by a majority of respondents in this area.

13. OPTIONS CONSIDERED AND REJECTED

13.1 An alternative option is not to change the parking control hours and keep the existing arrangement. This could have a detrimental effect on residents in that they would continue to suffer with parking issues after 5pm.

REPORT AUTHOR	Paul Tarrant, Traffic Engineer, Parking Design, High Improvements, Streets, 020 8726 6000 (Ext. 88256)
CONTACT OFFICER:	David Wakeling, Parking Design Manager Parking Design, High Improvements, Streets, 020 8726 6000 (Ext. 88229)
BACKGROUND DOCUMENTS	None

Proposed change of hours in the existing CPZ



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- West Thornton Zone
- West Thornton CPZ boundary
- existing parking bays
- existing double yellow lines
- Existing disabled bays

PLACE DEPARTMENT
 JO NEGRINI - EXECUTIVE DIRECTOR
 PO BOX No. 1482
 CROYDON
 CR9 1WX

INFRASTRUCTURE - TRAFFIC DESIGN
 Scale: NTS
 Date: April 2019
 Drawn: PT
 Checked: DJW
 Rev: 00
 Drawing Ref: PD-396

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Place Department
Highways
Bernard Weatherill House
8 Mint Walk
Croydon
CR01EA
Tel/Typetalk: 020 8726 6000
Minicom: 020 8760 5797

The Occupiers of:
46 Lavender Road
Croydon
CR0 3BH

Important Parking Information

Residents Parking Proposal - Questionnaire

Contact: Parking Design
Parking.Design@croydon.gov.uk
Tel: 020 8726 7100
Our Ref: PD/PS/PT/WT
Date: ****

Dear Occupier,

Proposed change of hours of the Croydon (West Thornton permit area) Controlled Parking Zone

I am writing to ask for your views on the proposal to change the existing controlled hours to 8am to 8pm Monday to Sunday in the West Thornton permit area as shown in the enclosed plan, which includes your road. The proposal is a direct response to a petition received from residents of Cecil Road, requesting that the Council change the hours of the existing Controlled Parking Zone.

The existing Controlled Parking Zone operates between 9am and 5pm, Monday to Saturday. During this period, parking is only permitted within parking bays with a valid permit or ticket displayed on the vehicle windscreen. Residents and businesses within the zone boundary are eligible to purchase parking permits. The enclosed fact sheet gives further information on CPZs and how the proposed scheme would operate if introduced in your road.

It is Council policy to engage with local residents before making decisions that affect them. This is why your views are important to us and we would be grateful if you could complete the attached questionnaire. Once completed, please return it in the enclosed pre-paid envelope by ***** 2019**.

All questionnaire responses and representations received by ****** 2019** will be presented in a report to the next TMAC for its consideration on ****** 2019**. This feedback will assist the TMAC in reaching a decision whether to introduce the scheme as proposed, vary it or abandon it.

Please do not hesitate to contact **Paul Tarrant** on **0208 726 7100** or by email **Paul.Tarrant@croydon.gov.uk** if you require further information or clarification on this proposal.

Yours faithfully,



David Wakeling Parking Design Manager – Highways and Parking Services

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Controlled Parking Zone (CPZ) – Frequently Asked Questions

1. What is a Controlled Parking Zone?

This is an area where parking activities are controlled by waiting restrictions (yellow lines) and parking bays. A CPZ usually operates during the daytime only, when traffic movement and parking activities are heaviest.

2. At what times will the restrictions apply?

The days and hours of proposed scheme will depend on the outcome of this consultation. However, existing CPZs in the borough operate either 9am – 5pm or 8am – 8pm Monday to Sunday and these are the two options you are being offered.

3. How long will I be able to park for during operational hours?

Permit holders and Blue Badge holders will be able to park for an unlimited period within parking bays, providing a valid permit/Blue Badge is displayed. Pay and display users will only be able to park for up to the maximum stay shown on the parking sign at the bay and on the parking machine.

4. Who is eligible for parking permits?

Any resident with a vehicle registered at an address within the zone and any business with a business address within the zone would be eligible for a parking permit. Information on how to apply for a permit will be sent to all consultees in due course if it is decided to proceed with the scheme. Please note, parking permits will not be available to residential developments with 10 or more households.

5. What about our visitors?

Visitors will only need to pay for parking during the hours of operation of the zone. Residents can purchase Resident Visitor Permits for their visitors at a cheaper rate than the normal daily tariff. During operational hours, visitors must display either a Pay & Display ticket obtained from a nearby parking machine or a Resident Visitor Permit (obtained via the resident they are visiting).

6. Why can't we have "resident only" parking?

The shared-use Permit / Pay & Display scheme proposed is far more flexible, allowing visitors, including customers of local businesses, to park. The permit cost is subsidised by Pay & Display users. Existing shared-use schemes provide residents far more opportunity to park than unregulated parking as the vast majority of commuters do not park within CPZs.

7. How much will permits cost?

Permit costs will match those of the existing CPZ, which are currently:

Residents

- £80 per year for first vehicle
- £126 per year for second vehicle (maximum of 2 permits per household)

Please note that all new permit applications are subject to a one-off £30 administration charge.

Visitors

- £4 per day for a Residents' Visitor Permit (**maximum of 60 half day / 4 hour permits per year per household**)

Controlled Parking Zone (CPZ) – Frequently Asked Questions (contd.)

9. cont.

Businesses

- £123 for three months per vehicle
- £382 per year per vehicle (*maximum of 2 vehicles per business*)

10. How much will Pay & Display tickets cost?

The existing pay and display 12 hour charges within the North Permit area is 50p every 30 minutes up to 12 hours.

12 hour max stay roads

30 mins	£0.50
1 hr	£1.00
2 hrs	£2.00
3 hrs	£3.00
4 hrs	£4.00
5 hrs	£5.00
6 hrs	£6.00
7 hrs	£7.00
8 hrs	£8.00
9hrs	£9.00
10hrs	£10.00
11hrs	£11.00
12hrs	£12.00

9. Where will parking bays and pay & display machines be provided?

Parking bays will be marked out on the carriageway in safe locations and away from junctions and dropped footway or driveway crossings. Yellow line waiting restrictions will be installed at locations where parking would be hazardous or cause obstruction. Pay and display machines will be provided on the footway where they would cause the least visual intrusion to residents. The number of parking bays will be maximised. Bay locations are shown on the plans enclosed.

10. Can you guarantee me a parking space outside my house?

It is not possible to guarantee anyone a particular space on the public highway. However, as residents are given a higher priority for the available parking spaces, they are more likely to find a parking space. Experience of existing zones shows that there are generally more spaces available within the zone during operational hours, than during times when parking is uncontrolled.

11. How can it be ensured that motorists parking in the zone park legitimately?

Civil Enforcement Officers (CEOs) will patrol the roads within the zone at regular intervals during the controlled hours. CEOs can issue a Penalty Charge Notice (parking ticket) to any vehicle that is parked in a manner that contravenes parking regulations e.g. parking on a yellow line or within a parking bay without displaying a valid permit/pay and display ticket. Illegally parked vehicles may also be towed away.

12. Will I be able to park across my driveway?

Yes, but only outside the controlled hours. It is not possible to mark bays across driveways as this would legalise obstruction.

13. What if I do not support the scheme?

Vote 'No' on the enclosed questionnaire - if the majority of residents / businesses vote against controlled parking then a scheme is unlikely to go ahead in the road / area.

If the majority of residents are in favour of the scheme there would be an opportunity to make further comments or object to the proposals at the Public Notice Stage when the scheme is formally advertised in the Croydon Guardian, by on-street notices and on the Council website. Please note that if the majority of residents in a small part of the consultation area are in favour of an extension to the zone, then a recommendation could be made to extend controlled parking to this area alone.

14. What happens next?

At the end of this consultation, the votes and comments on all returned questionnaires will be analysed. The results of these will be presented in a report to the Traffic Management Cabinet Advisory Committee for consideration at its next meeting on **** at **** in the Town Hall, Katharine Street, Croydon. The Committee will then make a decision whether or not to proceed with controlled parking in your road.

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West Thornton Parking Zone, Proposed change of hours - QUESTIONNAIRE

Your views are important to us, so please ensure you complete this Questionnaire and return it in the attached pre-paid envelope to reach us by ____.

Name*:

Address*:

** Without this information your vote will not be counted. This information will be used only for the purpose of this consultation. We will only use responses from occupiers within the proposed area shown on the attached plan – one response per household and return using the official pre-paid envelope provided.*

Please choose **one** option only by putting an 'X' in the appropriate box.

Option 1: Introduce the proposed operational time **8am to 8pm, Monday to Sunday.**

Option 2: **Do Nothing** – Retain the existing parking arrangements, 9am to 5pm Monday to Saturday.

Comments:

*The results of the consultation will be presented in a report to the Traffic Management Cabinet Advisory Committee for consideration at its next meeting at **** on **** in the Town Hall, Katharine Street, Croydon.*

Please return using the pre-paid envelope provided

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 24 July 2019
SUBJECT:	LOWER ROAD AREA – RESULTS OF INFORMAL CONSULTATION ON THE PROPOSED INTRODUCTION OF A CONTROLLED PARKING ZONE (CPZ)
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Environment, Transport and Regeneration (job share)
WARDS:	Kenley
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough’s roads as detailed in:</p> <ul style="list-style-type: none"> • Croydon Local Plan Feb 2018 • The Local Implementation Plan; 3.6 Croydon Transport policies • Croydon’s Community Strategy; Priority Areas 1, 3, 4 and 6 • The Croydon Plan 2nd Deposit; T4, T7, T35, T36, T42 and T43. • Croydon Corporate Plan 2015 – 18 • www.croydonobservatory.org/strategies/ 	
FINANCIAL IMPACT:	
These proposals can be contained within the available budget.	
FORWARD PLAN KEY DECISION REFERENCE NO.: n/a	
1. RECOMMENDATIONS	
That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:	
1.1	Consider the responses received to the informal consultation on the proposed introduction of a CPZ into the Lower Road Area.
1.2	Agree not to proceed to the formal consultation stage regarding the proposal to introduce the Kenley Controlled Parking Zone into Lower Road, Little Roke Road and Little Roke Avenue as illustrated on Drawing No. PD 395 due to the reasons set out in paragraph 3.8.
1.3	Inform the organisers of the petitions of these decisions.

2 EXECUTIVE SUMMARY

- 2.1 This report considers the results of the informal consultation on the proposal to introduce a Controlled Parking Zone to the currently unrestricted roads Lower Road, Little Roke Road and Little Roke Avenue.
- 2.2 It is recommended that the Council do not proceed to the formal consultation stage with a proposal to introduce parking controls in this area which would include Lower Road, Little Roke Road and Little Roke Avenue.
- 2.3 On 20 June 2019 and pursuant to the delegation from the Leader dated 6 June 2016, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to refer consideration of the matters detailed paragraph 2.2 above to the Traffic Management Advisory Committee for onward recommendation and determination to the Cabinet Member for Environment, Transport and Regeneration (job share).

3 DETAIL

- 3.1 A petition was received from residents in Lower Road last year for parking controls to be introduced in these streets, where demand for spaces is outstripping supply.
- 3.2 In response the Council commenced informal consultation on Friday, 10 May 2019 and continued until Friday, 7 June 2019. A total of 259 sets of consultation packs, which comprised of a letter, a map of the consultation area, frequently asked questions and a questionnaire were sent to addresses within the proposed extension area. Included in each pack was a pre-paid envelope for return of the questionnaire.
- 3.3 Consultees were requested to register their "Yes/No" preference votes to the question:
1. Are you in favour of introducing a CPZ Lower Road, Little Roke Road and Little Roke Avenue?
 2. Which operational period: Mon-Fri 9am to 5pm or Mon-Sat 9am to 5pm?
- Questionnaires were to be returned via the pre-paid envelope provided.
- 3.4 Over the course of the informal consultation a total of 111 completed questionnaires were returned, representing a 43% response rate which is considered excellent for an informal consultation exercise of this type. Table 1 shows the results and returns for the individual roads in the consultation area.

3.5 **TABLE 1 – Results of the Questionnaire**

Road Name	Addresses	Responses	% Returned	Yes	% Yes	No	% No
Little Roke Rd	40	18	44%	4	22%	14	78%
Lower Rd	113	43	38%	14	32%	29	68%
Little Roke Avenue	106	50	47%	13	26%	37	74%
Totals	259	111	43%	31	28%	80	72%

3.6 The results show that the majority of those within the consultation who responded to the informal consultation are **not** in favour of introducing a CPZ to the Kenley area.

3.7 Appendix A includes a summary of the comments that were received on the questionnaire sheets.

3.8 The questionnaire responses are considered to demonstrate that residents and businesses feel that there is no current need for parking controls in Lower Road, Little Roke Road and Little Roke Avenue. Surveys have shown that although parking stress takes place this is mainly during the evenings when most residents are at home and where a parking scheme will not give as much benefit as a daytime parking problem. It is therefore proposed not to progress parking controls for this area at the current time.

4 FINANCIAL CONSIDERATIONS

4.1 It is proposed not to introduce parking controls in Lower Road, Little Roke Road and Little Roke Avenue, therefore there are no financial considerations arising from this report.

4.2 *Approved by: Kate Bingham, Head of Finance, Place Department.*

5. COMMENTS OF THE SOLICITOR TO THE COUNCIL

5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

5.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication,

consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

5.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-

- The desirability of securing and maintaining reasonable access to premises.
- The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- The national air quality strategy.
- 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.
- Any other matters appearing to the Council to be relevant.

5.4 The Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision. The Council needs to comply with the necessary requirements of the Local Authorities Traffic Order Procedure) (England and Wales) Regulations 1996 by giving the appropriate notices and receiving representations. Such representations must be considered before a final decision is made.

5.5 *Approved by: Sandra Herbert, Head of Litigation and Corporate law on behalf of the Director of Law and Governance and Deputy Monitoring Officer.*

6. HUMAN RESOURCES IMPACT

6.1 There are no human resource impacts arising from this report.

6.2 *Approved by: Jennifer Sankar, Head of HR for Place on behalf of Sue Moorman, Director of HR.*

7. CUSTOMER IMPACT

7.1 Occupiers of all residential and business premises in the area were consulted to ensure that all those directly affected by the proposals were given the opportunity to give their views. The majority of responses showed that occupiers were not in favour of parking controls and it is proposed not to progress a scheme in this area which should appease most residents and businesses.

8. EQUALITIES IMPACT

8.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

9. ENVIRONMENTAL IMPACT

9.1 There are no environmental impacts arising from this report.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no crime and disorder reduction impacts arising from this report.

11. REASONS FOR RECOMMENDATIONS

11.1 The recommendations are not to proceed with any further action in this area as a majority of respondents did not support parking controls and surveys have shown that most of the parking stress occurs during the evening when a parking scheme may not necessarily help residents.

12. OPTIONS CONSIDERED AND REJECTED

12.1 The alternative option would be to proceed with the formal consultation but this would not accord with the expressed preference of the majority of those who responded to this informal consultation and may not resolve the problems experienced by residents.

REPORT AUTHOR

Omar Tingling, Traffic Engineer,
Parking Design, Highway Improvements,
Streets, 020 8726 6000

CONTACT OFFICER:

David Wakeling, Parking Design Manager
Parking Design, Highway Improvements,
Streets, 020 8667 8229

BACKGROUND DOCUMENTS

Consultation Documents

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Place Department
Highway Improvements
Parking Design
6th Floor, Zone C
Bernard Weatherill House
Croydon
CR0 1EA
Tel/Typetalk: 020 8726 6000
Minicom: 020 8760 5797

The Occupier

Contact: Parking Design
Parking.Design@croydon.gov.uk
Tel: 020 8726 3750
Our Ref: PD/OT/7
Date: **13 May 2019**

Important Parking Information
Controlled Parking Proposal Questionnaire

Dear Occupier,

Controlled Parking Zone Consultation - Proposed Introduction of a Controlled Parking Zone in Lower Road, Little Roke Avenue and Little Roke Road.

I am writing to ask for your views on the possibility of introducing a Controlled Parking Zone (CPZ) into the area shown on the enclosed map, which includes your road. The proposal is a response to a petition received from residents of Lower Road requesting that the Council introduce a controlled parking scheme to address the parking problems in this area. Controlled parking would also complement the proposed School Pedestrian Zone project which is also subject to consultation but could be in place by the new school term in September 2019.

Within a CPZ, parking is only permitted within parking bays during the operational hours if a valid permit is displayed on the vehicle windscreen or if motorists have paid via the RingGo 'pay by phone' system. Residents and businesses within the zone boundary are eligible to purchase parking permits.

It is Council policy to engage with local residents before making decisions that affect them. This is why your views are important to us and we would be grateful if you could complete the attached questionnaire. Once completed, please return it in the enclosed pre-paid envelope by **7 June 2019**.

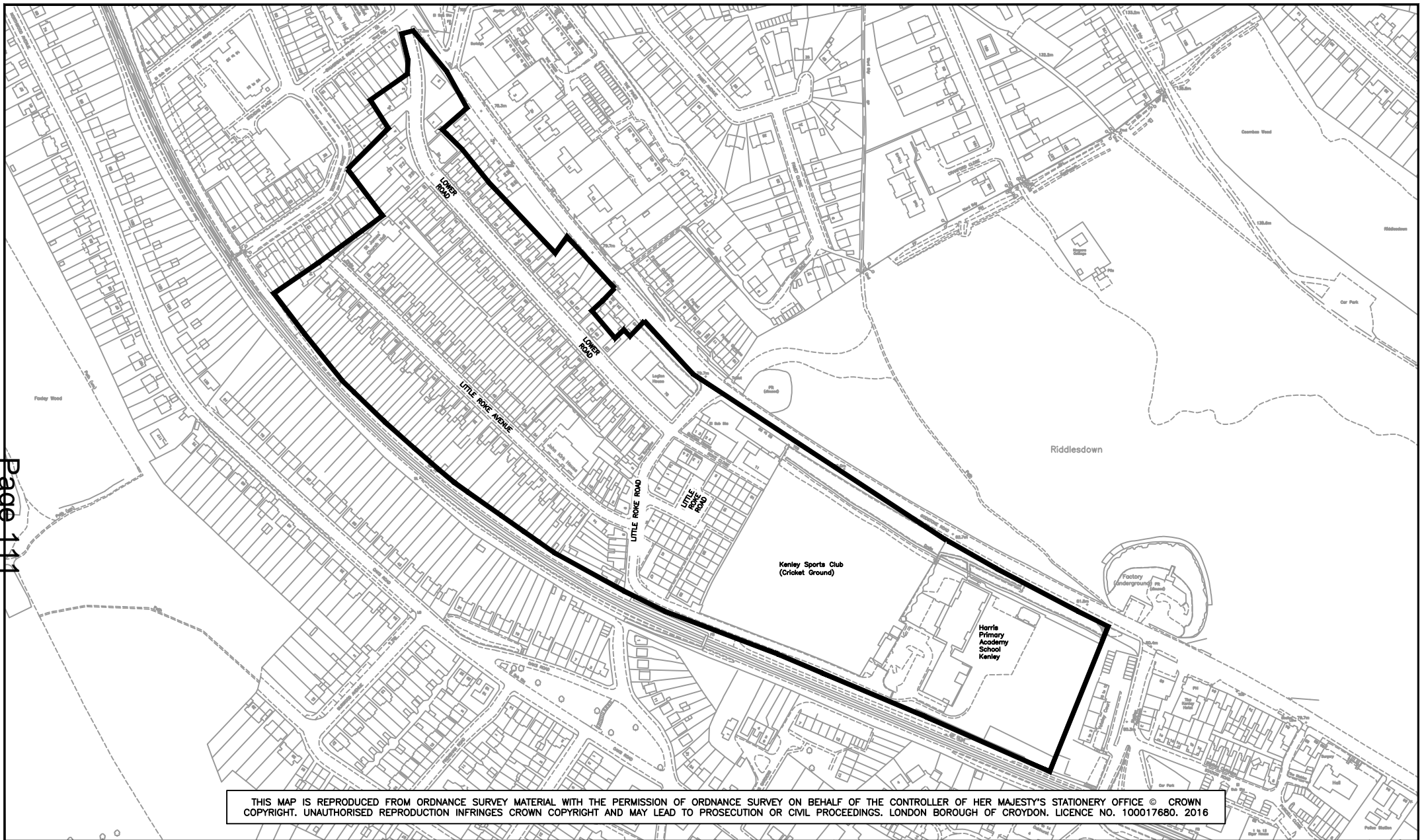
All questionnaire responses and representations received by Friday 7 June 2019 will be presented in a report to Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or refer the matter to the next Traffic Management Advisory Committee (TMAC) meeting, which is scheduled to take place on 10 July at 6:30pm in the Town Hall, Katharine Street, Croydon for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job share) for decision. Your feedback will assist the decision maker in reaching a decision on whether to proceed with a CPZ scheme.

Please do not hesitate to contact **Omar Tingling** on **020 8726 7100** or by email **omar.tingling@croydon.gov.uk** if you require further information or clarification on this proposal.



Yours faithfully,

David Wakeling
Parking Design Manager – Highway Improvements

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THIS MAP IS REPRODUCED FROM ORDNANCE SURVEY MATERIAL WITH THE PERMISSION OF ORDNANCE SURVEY ON BEHALF OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE © CROWN COPYRIGHT. UNAUTHORISED REPRODUCTION INFRINGES CROWN COPYRIGHT AND MAY LEAD TO PROSECUTION OR CIVIL PROCEEDINGS. LONDON BOROUGH OF CROYDON. LICENCE NO. 100017660. 2016

KEY CONSULTATION AREA 	JOB NAME LOWER ROAD AREA				PLACE DEPARTMENT STREETS DIVISION DIRECTOR - STEVE ILES		DRAWING NO PD395	REVISION 0
	DRAWING TITLE INFORMAL PARKING CONSULTATION						STATUS CONSULTATION	
	DESIGNER OT	VERIFIED DW	SCALE AT A4 NTS	DATE 09/05/19	HIGHWAY IMPROVEMENTS		 www.croydon.gov.uk	

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Controlled Parking Zone (CPZ) – Frequently Asked Questions

1. What is a Controlled Parking Zone?

This is an area where parking activities are controlled by waiting restrictions (yellow lines) and parking bays.

2. At what times will the restrictions apply?

The proposed scheme's hours of operation will mirror those of the existing neighbouring Controlled Parking Zone (i.e. 9am – 5pm). Most existing zones in the Borough operate Monday to Saturday and it is proposed to consult occupiers on this.

3. How long would I be able to park for during operational hours?

Permit holders and Disabled Blue Badge holders will be able to park for an unlimited period within parking bays, providing a valid permit/Blue Badge is displayed.

4. Who is eligible for parking permits?

Any business with a business address within the zone and any resident with a vehicle registered at an address (if planning conditions do not forbid the issuing of parking permits) within the zone would be eligible for a parking permit. Information on how to apply for a permit will be sent to all consultees in due course if it is decided to proceed with the scheme.

5. What about our visitors?

Visitors would only need to pay for parking during the hours of operation of the zone. During operational hours, visitors must pay via the cashless pay by phone RingGo system or purchase a Resident Visitor Permit (obtained via the resident they are visiting using the cashless RingGo system, usually at a lower rate, depending on the length of stay, than the normal daily tariff).

6. Why can't we have "resident only" parking?

The shared-use Permit / Pay by phone scheme proposed is more flexible, allowing visitors, including customers of local businesses and tradespeople, to park. The permit cost is subsidised by Pay by phone users. Existing shared-use schemes provide residents more opportunity to park during the hours of operation than unregulated parking as the majority of commuters are reluctant to pay for parking.

7. Is this not just a money making scheme?

It is a legal requirement that parking schemes are self-financed as no funding is available from Council Tax for these types of proposals. In outer areas, such as this proposed area, income levels are lower than town centre locations where parking demand is higher. Charges ensure that implementation and administration / enforcement costs can be covered within 5 to 10 years.

8. How much would permits cost?

Permit costs would match those of existing CPZs, which are **currently**:

Residents

- £80 per year for first vehicle
- £126 per year for second vehicle (**maximum of 2 permits per household**)
- There is a one off £30 administration charge for all new applicants

Businesses

- £123 for three months per vehicle
- £382 per year per vehicle (**maximum of 2 vehicles per business**)
- There is a one off £30 administration charge for all new applicants

Please take note of the following information on the proposed changes to permit charges:

Permit charges are currently being reviewed and from **October 2019** are proposed to be based on vehicle emissions.

Although the following charges for residents' permits have been agreed through the Council's Informal Cabinet Committee in March they are subject to consultation in which any objections would need to be considered before they are implemented. The charges for residents' permits are proposed to be as follows:

Vehicle registration from March 2001	CO ₂ emission (g/km)	Proposed new charge
Band 1	< 1	£6.50
Band 2	1 – 75	£65
Band 3	76 – 165	£104
Band 4	166 – 225	£146
Band 5	> 225	£300
Before March 2001	n/a	£300

It is proposed that there will be a surcharge for the second permit of £50 so that for the majority of vehicles emitting between 76 and 165g/km the cost of the second permit would be £104 + £50 = £154.

(**Please note** that proposed changes to Business Permits and Visitor permits have yet to be finalised and would be introduced at a later date, yet to be confirmed.)

9. Where would parking bays and yellow lines be marked?

Parking bays would be marked on the carriageway in safe locations and away from junctions and dropped crossings. Yellow line waiting restrictions would be introduced at locations where parking would be hazardous or cause obstruction.

10. Can you guarantee me a parking space outside my house?

It is not possible to guarantee anyone a particular space on the public highway.

11. How can it be ensured that motorists parking in the zone park legitimately?

Civil Enforcement Officers (CEOs) will patrol the roads within the zone during the controlled hours. CEOs can issue a Penalty Charge Notice (parking ticket) to any vehicle that is parked in a manner that contravenes parking regulations e.g. parking on a yellow line or within a parking bay without displaying a valid permit/pay and display ticket.

12. Will I be able to park across my driveway?

Yes, but only outside the controlled hours. It is not possible to mark bays across driveways as this would legalise obstruction.

13. What if I do not support the introduction of controlled parking?

Vote 'No' on the enclosed questionnaire - if the majority of respondents vote against controlled parking then a scheme is unlikely to go ahead in the area. If the majority of respondents are in favour of a scheme there would be an opportunity to make further comments or object to the proposals at the Public Notice (detailed design) Stage when the scheme is formally advertised in the Croydon Guardian, by on-street notices and on the Council website. Please note that if the majority of respondents in a small part of the consultation area are in favour of parking controls, then a recommendation could be made to proceed with the design of a scheme in this area / road alone.

14. What happens next?

The results of the consultation will be presented in a report to the Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next scheduled Traffic Management Advisory Committee (TMAC) meeting for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job Share) for decision. If the matter is referred to the next TMAC meeting, which is scheduled to take place on 10 July 2019 at 6:30pm in the Town Hall, Katharine Street, Croydon, any reports will be available to view 5 working days prior to the scheduled meeting by using the following link www.croydon.gov.uk/democracy/dande/minutes.

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Lower Road Area Consultation – QUESTIONNAIRE

Please ensure you complete this questionnaire and return it in the attached pre-paid envelope to reach us by **Friday 7 June 2019**.

Name*:

Address*:

** Without this information your vote will not be counted. This information will be used only for the purpose of this consultation. We will only use responses from occupiers within the proposed area shown on the attached drawing – one response per household and returned using the official pre-paid envelope provided.*

1. Are you in favour of the introduction of a CPZ in your road?

(Please choose **one** option only by putting an 'X' in the appropriate box).

Yes, a CPZ should be introduced (go to question 2)

No, controlled parking is not needed

Don't know

2. If you answered YES to the above question, which of the following options for the days and hours of operation, would you prefer?

(Please choose **one** option only by putting an 'X' in the appropriate box).

Monday to Saturday
9.00am – 5.00pm

Monday to Friday
9.00am – 5.00pm

3. If you have any comments please use the box

The results of the consultation will be presented in a report to the Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next scheduled TMAC meeting for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job Share) for decision. If the matter is referred to the next scheduled TMAC meeting which is due to take place on 10 July 2019, the meetings usually take place at 6:30pm in the Town Hall, Katharine Street, Croydon and any reports will be available to view 5 working days prior to the scheduled meeting by using the following link:

www.croydon.gov.uk/democracy/dande/minutes

Please return using the pre-paid envelope provided

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 24 JULY 2019
SUBJECT:	SOUTH CROYDON AREA – RESULTS OF INFORMAL CONSULTATION ON THE PROPOSED INTRODUCTION OF A CONTROLLED PARKING ZONE (CPZ)
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place
CABINET MEMBER:	Councillor Stuart King, Cabinet Member for Environment, Transport and Regeneration (job share)
WARDS:	South Croydon
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough’s roads as detailed in:</p> <ul style="list-style-type: none"> • Croydon Local Plan Feb 2018 • The Local Implementation Plan; 3.6 Croydon Transport policies • Croydon’s Community Strategy; Priority Areas 1, 3, 4 and 6 • The Croydon Plan 2nd Deposit; T4, T7, T35, T36, T42 and T43. • Croydon Corporate Plan 2015 – 18 • www.croydonobservatory.org/strategies/ 	
FINANCIAL IMPACT:	
These proposals can be contained within the available budget.	
FORWARD PLAN KEY DECISION REFERENCE NO.: n/a	
1. RECOMMENDATIONS	
That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:	
1.1	Consider the responses received to the informal consultation on the proposed introduction of a CPZ (Controlled Parking Zone) into the South Croydon Area.
1.2	Agree to proceed to the formal consultation stage for a proposal to extend the Croydon CPZ (West Permit Zone) into Sunny Nook Gardens and Sussex Road, as illustrated on drawing number PD 398a.
1.3	Agree to proceed to the formal consultation stage for a proposal to extend the Bynes Road CPZ into the remainder of Bynes Road as illustrated on drawing no. PD 398b.
1.4	If formal consultation is agreed, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give the notice.

2 EXECUTIVE SUMMARY

- 2.1 This report considers the results of the informal consultation on the proposed introduction of a CPZ into the South Croydon Area which includes roads close to the existing Croydon CPZ (West and South Permit Zones), Bynes Road CPZ and Napier Road CPZ.
- 2.2 Due to the parking issues in the area and based on the views from residents in 3 of the roads it is recommended that the Council proceeds to the formal consultation stage with a proposal to introduce controlled parking into Sunny Nook Gardens, Sussex Road, and Bynes Road as illustrated on drawing nos. PD 398a and PD 398b.
- 2.3 On 24 June 2019 and pursuant to the delegation from the Leader dated 6 June 2016, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to refer consideration of the matters detailed paragraph 2.2 above to the Traffic Management Advisory Committee for onward recommendation and determination to the Cabinet Member for Environment, Transport and Regeneration (job share).

3 DETAIL

- 3.1 Petitions were received from residents of Churchill Road, Bynes Road, and Sussex Road (during October 2017, December 2017, and February 2019 respectively), requesting that a controlled parking zone be introduced to help improve parking conditions.
- 3.2 In response the Council commenced an informal consultation for possible parking controls in Selsdon Road (part of), Sunny Nook Gardens, Selsdon Avenue, Sussex Road (part of), Haling Road (part of), Helder Street, Jarvis Road, Newark Road, Mansfield Road, Crunden Road, Chelsham Road, Brighton Road (part of), Bynes Road (part of), Rolleston Road, Chambers Place, Purley Road, Wyche Grove, Churchill Road and Darmaine Close on 2 May 2019. The consultation ended on 29 May 2019
- 3.3 A total of 1484 sets of consultation documents (one per property) which comprised of a letter, explaining the reasons for the consultation, a map of the consultation area, a Frequently Asked Questions factsheet and a questionnaire (appended to this report) were sent to addresses within this area. Included in each pack was a pre-paid envelope for the return of the questionnaire.
- 3.4 Consultees were requested to register their "Yes/No" preference votes, with the operational hours of 9am to 5pm Monday to Saturday matching the controls in the existing zones bordering the consultation area.
- 3.5 Over the course of the informal consultation a total of 440 completed questionnaires were returned, representing a 30% response rate which is similar to that normally expected for an informal consultation exercise of this type. Table 1 shows the number of properties and returns for all of the individual roads within the consultation area.

Table 1 – Response rates by road

Street name	No. of Properties	No. of responses	Response rate
Brighton Road	221	35	16%
Bynes Road	103	53	51%
Chambers Place	5	2	40%
Chelsham Road	90	46	51%
Churchill Road	149	62	42%
Crunden Road	80	33	41%
Darmaine Close	8	2	25%
Haling Road	56	15	27%
Helder Street	52	19	37%
Jarvis Road	65	35	54%
Kensington Terrace	3	0	0%
Mansfield Place	3	1	33%
Mansfield Road	68	32	47%
Newark Road	65	29	45%
Purley Road	48	17	35%
Redsan Close	27	2	7%
Rolleston Road	20	10	50%
Sanderstead Road	136	39	29%
Selsdon Avenue	19	8	42%
Selsdon Road	100	22	22%
Sunny Nook Gardens	19	7	37%
Sussex Road	110	32	29%
Wyche Grove	36	19	53%
Total	1483	440	30%

3.6 The table 2 below shows in detail the road by road responses.

Table 2

Are you in favour of a CPZ?					
	No. of responses	Yes		No	
Brighton Road	35	4	11%	31	89%
Bynes Road	53	30	57%	23	43%
Chambers Place	2	2	100%	0	0%
Chelsham Road	46	8	17%	38	83%
Churchill Road	62	25	40%	37	60%
Crunden Road	33	7	21%	26	79%
Darmaine Close	2	2	100%	0	0%
Haling Road	15	7	47%	8	53%
Helder Street	19	4	21%	15	79%
Jarvis Road	35	14	40%	21	60%
Kensington Terrace	0	0	0%	0	0%
Mansfield Place	1	0	0%	1	100%
Mansfield Road	32	11	34%	21	66%
Newark Road	29	9	31%	20	69%
Purley Road	17	5	29%	12	71%
Redsan Close	2	0	0%	2	100%
Rolleston Road	10	3	30%	7	70%
Sanderstead Road	39	13	33%	26	67%
Selsdon Avenue	8	2	25%	6	75%
Selsdon Road	22	6	27%	17	73%
Sunny Nook Gardens	7	4	57%	3	43%
Sussex Road	32	17	53%	15	47%
Wyche Grove	19	2	11%	17	89%
TOTAL	440	146	33%	294	67%

3.7 Overall, table 2 shows 146 respondents (33%) indicated that they were in favour of the introduction of a CPZ in their road. 294 respondents (67%) did not support the introduction of parking controls.

- 3.8 On a road by road basis of respondents, of the 23 roads consulted five roads had over 50% of respondents in favour of the introduction of parking controls; Bynes Road, Chambers Place, Darmaine Close, Sunny Nook Gardens, and Sussex Road.
- 3.9 Chambers Place is a private road off Rolleston Road, and Darmaine Close is a private road off Churchill Road. As parking controls would not be installed on a private road it is impossible to include Chambers Place and Darmaine Close in a future scheme without also including Rolleston Road or Churchill Road respectively.
- 3.10 Due to the parking stress experienced by residents and the need 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 it is proposed to proceed to a formal consultation with detailed design in Sunny Nook Gardens, Sussex Road, and Bynes Road, as illustrated on drawing numbers PD 398a and PD 398b.
- 3.11 **Table 3** –to be formally consulted

Street Name	No. of responses	In favour of a CPZ?			
		Yes		No	
Bynes Road	53	30	57%	23	43%
Sunny Nook Gardens	7	4	57%	3	43%
Sussex Road	32	17	53%	15	47%
TOTAL	92	51	55%	41	45%

- 3.12 The final section of the questionnaire also offered respondents the opportunity, should they wish, to make any other comments they might have relating to parking. A summary of the comments received is included in the appendix.
- 3.13 The introduction of a new CPZ requires the making of a Traffic Management Order. The legal process for making a Traffic Management Order requires formal consultation to take place in the form of Public Notices published in the London Gazette and a local newspaper (Croydon Guardian). Although not a legal requirement, this Council also fixes street notices to lamp columns in the vicinity of the proposed scheme and writes to occupiers who are directly affected to inform as many people as possible of the proposals.
- 3.14 Official bodies such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK, The Owner Drivers' Society, The Confederation of Passenger Transport and bus operators are consulted under the terms of the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. Additional bodies, up to 27 in total, are consulted depending on the relevance of the proposals.
- 3.15 Once the notices have been published, the public has 21 days to comment or object to the proposals. If no relevant objections are received, the Traffic Management Order may then be made. Any relevant objections received following the giving of public notice will be considered by the Executive Director of Place and may be referred to

the Traffic Management Advisory Committee for consideration and onward recommendation to the Cabinet Member for Environment, Transport and Regeneration (job share).

4 FINANCIAL CONSIDERATIONS

The required capital expenditure will be funded via an allocation within the TfL LIP grant funding allocated to Croydon for 2019/20. Total funding of £75k is included for controlled parking schemes in 2019/20. Attached to the papers of this meeting is a summary of the overall financial impact of this and other applications for approval at this meeting. If all applications were approved there would be funding of £57k remaining in 2019/20.

4.1 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000
<u>Revenue Budget available</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
<u>Effect of Decision from Report</u>				
Expenditure	0	0	0	0
Income	0	0	0	0
Remaining Budget	0	0	0	0
<u>Capital Budget available</u>				
Expenditure	75	0	0	0
Effect of Decision from report				
Expenditure	14	0	0	0
Remaining Budget	61	0	0	0

4.2 The effect of the decision

4.2.1 The cost of introducing controlled parking into the South Croydon Area has been estimated at £14,400. This includes the supply and installation of signs, lines and a contribution towards the legal costs.

4.2.2 These costs can be contained within the available capital budgets for 2019/20.

4.3 Risks

- 4.3.1 The current method of introducing parking controls is very efficient with the design and legal work being carried out within the department. The marking of the bays and the supply and installation of signs and posts is carried out using the new Highways Contract and the rates are lower than if the schemes were introduced under separate contractual arrangements.

4.4 Options

- 4.4.1 An alternative option is to introduce a Residents Only parking scheme. Virtually all permit schemes in the Borough are shared-use with Pay & Display users and this offers the greatest flexibility for drivers who may be visitors to residents and businesses in the area or the minority of commuters who are willing to pay for all day parking.

4.5 Savings/ future efficiencies

- 4.5.1 If controlled parking is introduced future income will be generated from paid for parking (Pay by Phone), together with enforcement of these controls through the issue of Penalty Charge Notices. CPZ schemes have typically been proven to be self-financing usually within 4 years of introduction.

- 4.6 *Approved by: Kate Bingham, Head of Finance, Place Department.*

5. COMMENTS OF THE SOLICITOR TO THE COUNCIL

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

- 5.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

- 5.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-

- The desirability of securing and maintaining reasonable access to premises.
- The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- The national air quality strategy.

- 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.
 - Any other matters appearing to the Council to be relevant.
- 5.4 The Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision. The Council needs to comply with the necessary requirements of the Local Authorities Traffic Order Procedure) (England and Wales) Regulations 1996 by giving the appropriate notices and receiving representations. Such representations must be considered before a final decision is made.
- 5.5 *Approved by: Sandra Herbert, Head of Litigation and Corporate law on behalf of the Director of Law and Governance and Deputy Monitoring Officer.*

6. HUMAN RESOURCES IMPACT

- 6.1 Enforcement of new parking schemes will require increased enforcement duties by Civil Enforcement Officers. It is anticipated that this additional enforcement can be undertaken using existing resources.
- 6.2 *Approved by: Jennifer Sankar, Head of HR for Place on behalf of Sue Moorman, Director of HR.*

7. CUSTOMER IMPACT

- 7.1 The proposed introduction of parking controls into Bynes Road, Sunny Nook Gardens and Sussex Road is in response to support from local residents for a parking scheme.
- 7.2 Occupiers of all residential and business premises in the area were consulted to ensure that all those potentially affected by the proposals were given the opportunity to give their views. Parking controls are only introduced in the area where the majority of residents are in favour of a scheme. The proposals are therefore likely to be seen as a positive move by the Council and should improve residents' and businesses' views of the work carried out by the Borough.

8. EQUALITIES IMPACT

- 8.1 An initial Equalities Impact Assessment (EqIA) has been carried out and it is considered that a Full EqIA is not required.

10. ENVIRONMENTAL IMPACT

- 10.1 Parking schemes are designed so that the signing is kept to a minimum to reduce the environmental impact. Narrow 50mm wide lines can be used in environmentally sensitive and conservation areas.

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 The fact that uniformed Civil Enforcement Officers will be regularly patrolling the area should have a deterrent effect on crime.

12. REASONS FOR RECOMMENDATIONS

12.1 The recommendations are to give notice of the proposal to introduce a new CPZ into the roads listed in paragraph 1.2 and subject to receiving no objections on the giving of the public notice to make the necessary Traffic Management Order. It is considered that parking controls would improve parking conditions for residents and visitors whilst improving safety and access.

13. OPTIONS CONSIDERED AND REJECTED

13.1 The alternative option would be not to proceed with publication of the public notice and formal consultation but this would not accord with the expressed preference of the majority of those who responded to this informal consultation.

REPORT AUTHOR

Teresa O'Regan, Traffic Engineer,
Parking Design, Highway Improvements,
Streets, 020 8726 6000

CONTACT OFFICER:

David Wakeling, Parking Design Manager
Parking Design, Highway Improvements,
Streets, 020 8667 8229

BACKGROUND DOCUMENTS

Consultation Documents

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APPENDIX A – Comments from the questionnaire

1 Included in the questionnaire was a comments box for respondents to respond in writing on the proposals. A summary of these comments is included in the table below.

2 **TABLE 4 – Comments from residents**

	Comment	No. of Comments
1	Difficulty in finding parking spaces	22
2	Parking spaces are taken by commuters	10
3	Parking problems contribute to road safety issues	1
4	Proposed scheme will help residents	2
5	New developments contribute to parking problems	2
6	Scheme will help deal with abandoned vehicles	1
7	Scheme would allow space for vehicles to pass each other	1
8	Vehicles park illegally across residents driveways	1
9	Scheme should start at 8am or 8:30am	1
10	Parking problems are caused by local school	1
11	Parking spaces are taken by second hand car dealers	1
12	Parking spaces are taken by bus drivers	10
13	Parking should only be allowed on one side of Purley Road	1
14	Footway parking needed in Sunny Nook Gardens	1
15	Sussex Road should be in Croydon (South Permit Area) CPZ	1
16	Red-route should be installed in parts of Sussex Road	1
17	There are no parking problems in the area	11
18	Permits are too expensive/resident does not wish to pay	27
19	Proposed scheme will make the parking situation worse	4
20	A 'residents only' scheme would be preferred	6

21	Bank holidays were not mentioned in the letters distributed	1
22	Residents will no longer have visitors	2
23	Consultation area extends too far	4
24	The scheme should operate between 7am and 7pm	1
25	There should be a limited stay for drivers who 'pay and display'	1
26	Free, limited stay parking bays should be introduced on Brighton Road	1
27	Parking bays are too large	2
28	Scheme should operate between 9am and 9pm	1
29	Residents of Brighton Road should not be allowed to purchase permits	1
30	Scheme will be of no benefit to residents	1
31	Parking problems are in the evening	4
32	Scheme should operate between 9am and midnight	1
33	Resident does not want long continuous bays	1
34	Scheme should operate from 9am until 6pm or 6:30pm	1
35	Residents should be consulted on bay sizes	1
36	Long continuous bays are preferred	1
37	The number of business permits available is too low	1
38	1 hour restriction in the middle of the day is preferred	1
39	24/7 parking controls are preferred ¹	1
40	Scheme would be bad for businesses	9
41	Scheme is not needed	18
42	There will be fewer parking spaces	25
43	Scheme will not deter motorists	4
44	Scheme is discriminating against those who do not have driveways	3
45	Disagree with emission based charging	7
46	Want to be able to park alongside dropped kerb	6

47	Proposal is a money making scheme	9
48	The cost of permits is unclear	1
49	There should only be one residents permit allowed per household	2
50	The second residents permit should be much more expensive	1
51	Residents of flats should not be allowed to apply for permits	1
52	CPZs should not be introduced in residential areas	1
53	Residents are not guaranteed a parking space	7
54	Controls should be Mon – Fri only	8
55	Scheme will not improve the parking situation	3
56	Electric charging points should be introduced instead	1
57	More visitors permits should be allowed	1
58	Scheme should operate between 11am and 3pm	1
59	Scheme will inconvenience elderly residents	1
60	Scheme should operate from 9am to 7pm	1
61	There should be a maximum stay of 4 hours	1
62	The scheme will not help residents	2
63	Sundays should be included in the scheme	1
64	Scheme should operate between 8am and 6pm	1
65	Scheme penalised poorer residents	1
66	Existing schemes are not enforced	1
67	Scheme should operate from midday to 2pm	1
68	More front gardens will be paved over for driveways	1
69	Parking availability has improved over the years	1
70	Parking problems are mainly at the weekend	1
71	Scheme would cause parked cars to be displaced onto the streets	1
72	Scheme would make it more difficult to find a parking space	3
73	Sussex Road should be made one-way	1

74	Churchill Road should be made one-way	1
75	Will be difficult for friends and tradespeople to park	3
76	Scheme would have a negative impact on patients attending the local medical practices	1

Bynes Road Area Consultation – QUESTIONNAIRE

Please ensure you complete this questionnaire and return it in the attached pre-paid envelope to reach us by 29 May 2019.

Name*:.....

Address*:

** Without this information your vote will not be counted. This information will be used only for the purpose of this consultation. We will only use responses from occupiers within the proposed area shown on the attached drawing – one response per household and returned using the official pre-paid envelope provided.*

Are you in favour of extending a Controlled Parking Zone (CPZ) into the area under consultation?

Please choose **one** option only by putting an 'X' in the appropriate box.

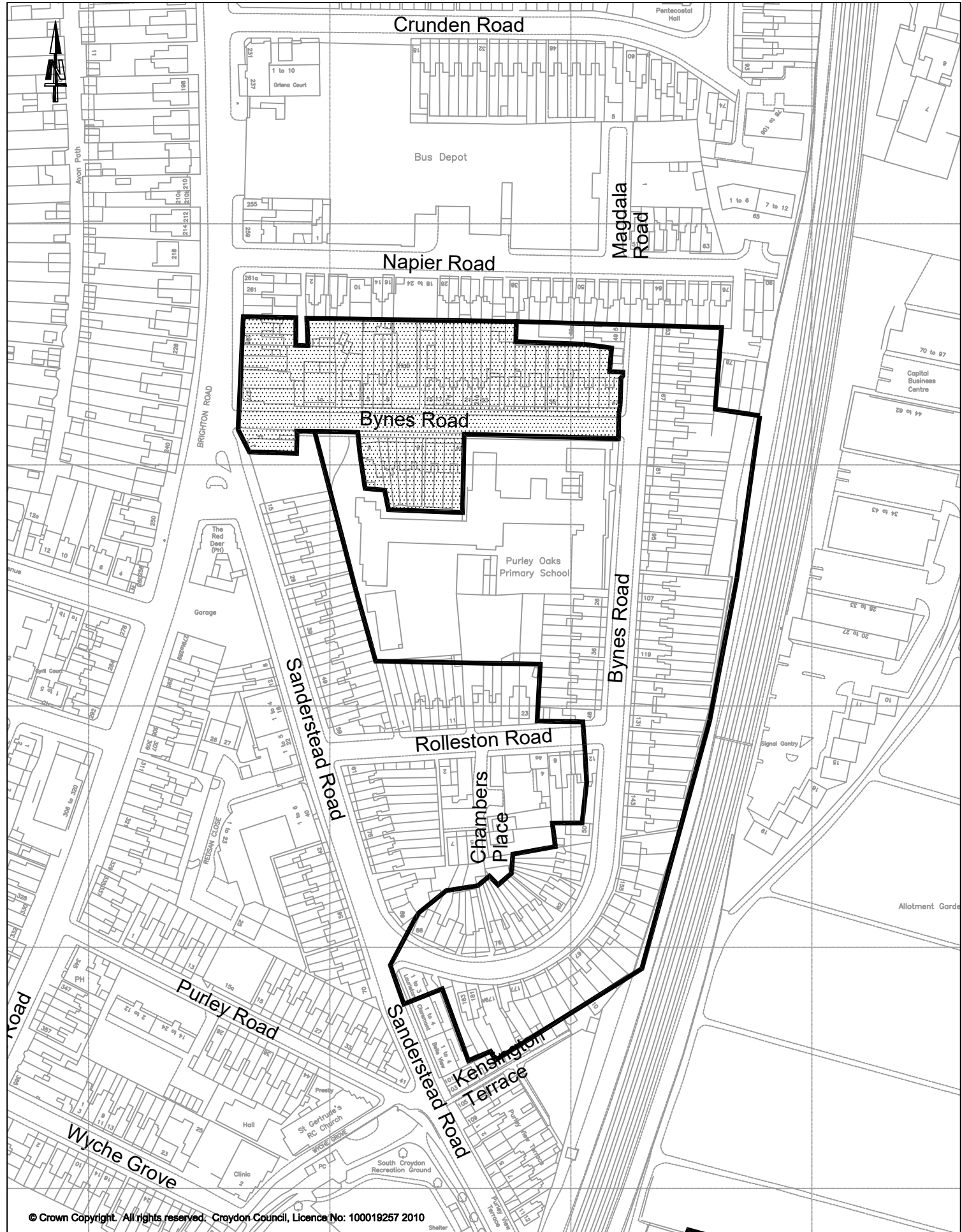
Yes, parking controls should be extended

No, controlled parking is not needed

*The results of the consultation will be presented in a report to the Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next scheduled TMAC meeting for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job Share) for decision. If the matter is referred to the next scheduled TMAC meeting, the meetings usually take place at 6:30pm in the Town Hall, Katharine Street, Croydon and any reports will be available to view 5 working days prior to the scheduled meeting by using the following link:
www.croydon.gov.uk/democracy/dande/minutes*

Please return using the pre-paid envelope provided

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Existing Bynes Road CPZ



Proposed Extension to Bynes Road CPZ

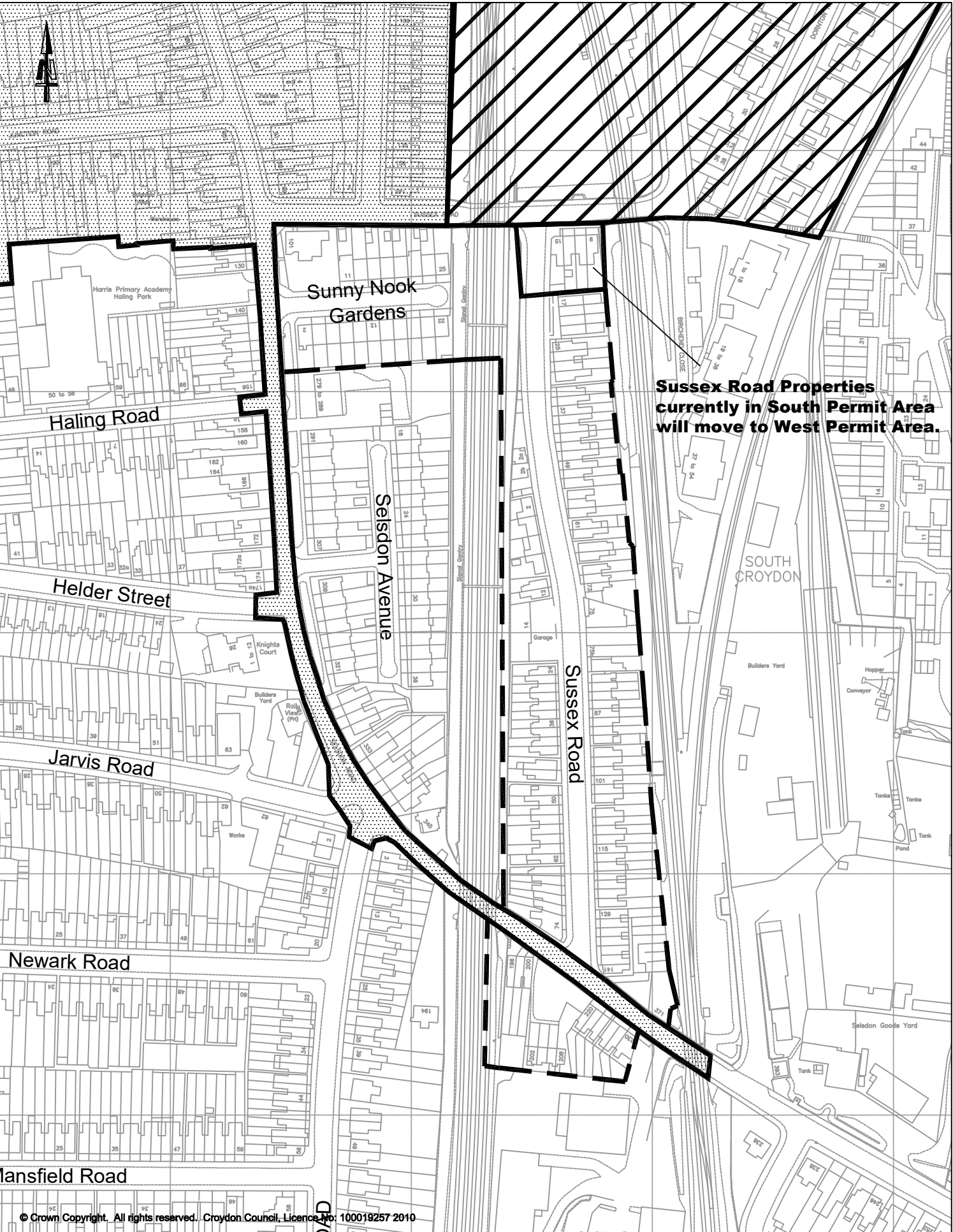
CROYDON COUNCIL

SOUTH CROYDON AREA Proposed Extension of Bynes Road CPZ

PLACE DEPARTMENT
SHIFA MUSTAJAR, EXECUTIVE DIRECTOR
D WEAVER, ILL HOUSE
CROYDON
CR0 1EA




HIGHWAY IMPROVEMENTS - PARKING DESIGN			
Scale. NTS	Drawn TOR	Checked DW	Rev. 00
Date.	Drawing Ref.		
JUNE 2019	PD 398b		

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Sussex Road Properties currently in South Permit Area will move to West Permit Area.

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-  Existing Croydon (West Permit Area) CPZ
-  Proposed Extension to Croydon (West Permit Area) CPZ
-  Croydon (South Permit Area) CPZ

CROYDON COUNCIL

SOUTH CROYDON AREA
Proposed Extension of Croydon (West Permit Area) CPZ

PLACE DEPARTMENT SHIFA MUSTAJAB, EXECUTIVE DIRECTOR ROAD WEATHERILL HOUSE CROYDON CR0 1EA		HIGHWAY IMPROVEMENTS - PARKING DESIGN Scale: NTS Drawn TOR Checked DW Rev. 00	
Date: JUNE 2019		Drawing Ref. PD 398a	

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Place Department
Highway Improvements
Parking Design
6th Floor, Zone C
Bernard Weatherill House
Croydon
CR0 1EA

Tel/Typetalk: 020 8726 6000
Minicom: 020 8760 5797

Contact: Parking Design
Parking.Design@croydon.gov.uk
Tel: 020 8726 7100
Our Ref: PD/PL/TOR/7TC
Date: **2 May 2019**

The Occupier
111-113 Brighton Road
South Croydon
CR2 6EE

Important Parking Information **Controlled Parking Questionnaire**

Dear Occupier,

Controlled Parking Zone Consultation - 'South Croydon Area'

I am writing to ask for your views on the possibility of introducing a Controlled Parking Zone (CPZ) into the area shown on the enclosed map, which includes your road. The proposal is a direct response to petitions received from residents of Bynes Road, Churchill Road, and Sussex Road, requesting that the Council introduce a controlled parking scheme to address the parking problems in this area.

The existing neighbouring CPZs (Croydon West, Croydon South, Napier Road and Bynes Road) operate between 9am and 5pm, Monday to Saturday. Any extension to the CPZs would mirror these times. During the period of operation, parking is only permitted within parking bays with a valid permit or ticket displayed on the vehicle windscreen or if motorists have paid via the RingGo 'pay by phone' system. Residents and businesses within the zone boundary are eligible to purchase parking permits.

It is Council policy to engage with local residents before making decisions that affect them. This is why your views are important to us and we would be grateful if you could complete the attached questionnaire. Once completed, please return it in the enclosed pre-paid envelope by **Wednesday, 29 May 2019**.

All questionnaire responses and representations received by 29 May 2019 will be presented in a report to Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next Traffic Management Advisory Committee (TMAC) meeting, which is scheduled to take place on 10 July at 6:30pm in the Town Hall, Katharine Street, Croydon for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job share) for decision. Your feedback will assist the decision maker in reaching a decision on whether to proceed with a CPZ scheme.

Please do not hesitate to contact **Teresa O'Regan** on **020 8726 7100** or by email **teresa.o'regan@croydon.gov.uk** if you require further information or clarification on this proposal.

Yours faithfully,

David Wakeling
Parking Design Manager – Highway Improvements

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Controlled Parking Zone (CPZ) – Frequently Asked Questions

1. What is a Controlled Parking Zone?

This is an area where parking activities are controlled by waiting restrictions (yellow lines) and parking bays.

2. At what times will the restrictions apply?

The proposed scheme's hours of operation will mirror those of the existing neighbouring Controlled Parking Zones (ie 9am – 5pm Monday – Saturday).

3. How long would I be able to park for during operational hours?

Permit holders and Blue Badge holders will be able to park for an unlimited period within parking bays, providing a valid permit/Blue Badge is displayed.

4. Who is eligible for parking permits?

Any business with a business address within the zone and any resident with a vehicle registered at an address (if planning conditions do not forbid the issuing of parking permits) within the zone would be eligible for a parking permit. Information on how to apply for a permit will be sent to all consultees in due course if it is decided to proceed with the scheme.

5. What about our visitors?

Visitors would only need to pay for parking during the hours of operation of the zone. Residents can purchase Resident Visitor Permits for their visitors at a cheaper rate than the normal daily tariff. During operational hours, visitors must display either a Pay & Display ticket obtained from a nearby parking machine, pay via the cashless RingGo system or purchase a cashless Resident Visitor Permit (obtained via the resident they are visiting).

6. Why can't we have "resident only" parking?

The shared-use Permit / Pay & Display / Pay by phone scheme proposed is more flexible, allowing visitors, including customers of local businesses and tradespeople, to park. The permit cost is subsidised by Pay & Display / Pay by phone users. Existing shared-use schemes provide residents more opportunity to park during the hours of operation than unregulated parking as the majority of commuters are reluctant to pay for parking.

7. Is this not just a money making scheme?

It is a legal requirement that parking schemes are self-financed as no funding is available from Council Tax for these types of proposals. In outer areas, such as this proposed area, income levels are lower than town centre locations where parking demand is higher. Charges ensure that implementation costs can be covered within 5 to 10 years.

8. How much would permits cost?

Permit costs would match those of existing CPZs, which are **currently**:

Residents

- £80 per year for first vehicle
- £126 per year for second vehicle (**maximum of 2 permits per household**)
- There is a one off £30 administration charge for all new applicants

Businesses

- £123 for three months per vehicle
- £382 per year per vehicle (**maximum of 2 vehicles per business**)
- There is a one off £30 administration charge for all new applicants

However, please take note of the following information on the proposed changes to permit charges:

Permit charges are currently being reviewed and from October 2019 are proposed to be based on vehicle emissions.

Controlled Parking Zone (CPZ) – Frequently Asked Questions (contd.)

Cont. overleaf

Although the following charges for residents' permits have been agreed through the Council's Informal Cabinet Committee in March they are subject to consultation in which any objections would need to be considered before they are implemented. The charges for residents' permits are proposed to be as follows:

Vehicle registration from March 2001	CO ₂ emission (g/km)	Proposed new charge
Band 1	< 1	£6.50
Band 2	1 – 75	£65
Band 3	76 – 165	£104
Band 4	166 – 225	£146
Band 5	> 225	£300
Before March 2001	n/a	£300

It is proposed that there will be a surcharge for the second permit of £50 so that for the majority of vehicles emitting between 76 and 165g/km the cost of the second permit would be £104 + £50 = £154.

Proposed changes to Business Permits and Visitor permits have yet to be finalised and would be introduced at a later date, yet to be confirmed.

9. Where would parking bays and pay & display machines be provided?

Parking bays would be marked on the carriageway in safe locations and away from junctions and dropped crossings. Yellow line waiting restrictions would be installed at locations where parking would be hazardous or cause obstruction. Pay and display machines (if used) would be provided on the footway where they would cause the least intrusion to residents.

10. Can you guarantee me a parking space outside my house?

It is not possible to guarantee anyone a particular space on the public highway.

11. How can it be ensured that motorists parking in the zone park legitimately?

Civil Enforcement Officers (CEOs) will patrol the roads within the zone during the controlled hours. CEOs can issue a Penalty Charge Notice (parking ticket) to any vehicle that is parked in a manner that contravenes parking regulations e.g. parking on a yellow line or within a parking bay without displaying a valid permit/pay and display ticket.

12. Will I be able to park across my driveway?

Yes, but only outside the controlled hours. It is not possible to mark bays across driveways as this would legalise obstruction.

13. What if I do not support the introduction of controlled parking?

Vote 'No' on the enclosed questionnaire - if the majority of respondents vote against controlled parking then a scheme is unlikely to go ahead in the area. If the majority of respondents are in favour of a scheme there would be an opportunity to make further comments or object to the proposals at the Public Notice (detailed design) Stage when the scheme is formally advertised in the Croydon Guardian, by on-street notices and on the Council website. Please note that if the majority of respondents in a small part of the consultation area are in favour of parking controls, then a recommendation could be made to proceed with the design of a scheme in this area / road alone.

14. What happens next?

The results of the consultation will be presented in a report to the Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next scheduled Traffic Management Advisory Committee (TMAC) meeting for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job Share) for decision. If the matter is referred to the next TMAC meeting, which is scheduled to take place on 10 July 2019 at 6:30pm in the Town Hall, Katharine Street, Croydon, any reports will be available to view 5 working days prior to the scheduled meeting by using the following link www.croydon.gov.uk/democracy/dande/minutes.

Bynes Road Area Consultation – QUESTIONNAIRE

Please ensure you complete this questionnaire and return it in the attached pre-paid envelope to reach us by 29 May 2019.

Name*:.....

Address*:

** Without this information your vote will not be counted. This information will be used only for the purpose of this consultation. We will only use responses from occupiers within the proposed area shown on the attached drawing – one response per household and returned using the official pre-paid envelope provided.*

Are you in favour of extending a Controlled Parking Zone (CPZ) into the area under consultation?

Please choose **one** option only by putting an 'X' in the appropriate box.

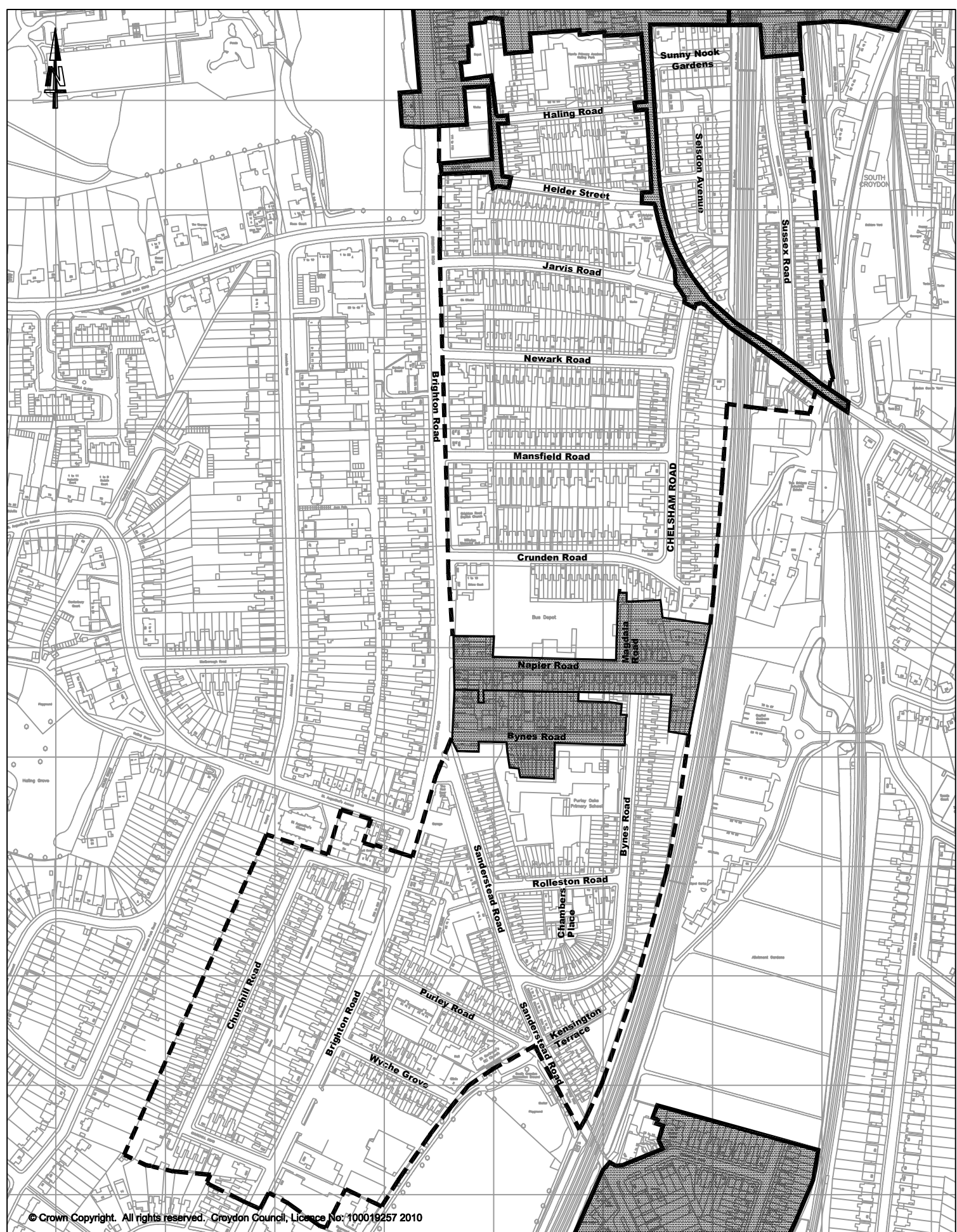
Yes, parking controls should be extended

No, controlled parking is not needed

*The results of the consultation will be presented in a report to the Executive Director of Place to consider whether or not to proceed with the formal consultation on the CPZ scheme or whether to refer the matter to the next scheduled TMAC meeting for consideration and onward recommendation to the Cabinet Member for Environment, Transport & Regeneration (Job Share) for decision. If the matter is referred to the next scheduled TMAC meeting, the meetings usually take place at 6:30pm in the Town Hall, Katharine Street, Croydon and any reports will be available to view 5 working days prior to the scheduled meeting by using the following link:
www.croydon.gov.uk/democracy/dande/minutes*

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Existing Controlled Parking Zone



Informal Consultation Area

CROYDON COUNCIL

SOUTH CROYDON AREA Proposed Controlled Parking Zone Extension

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PLACE DEPARTMENT
SHIFA MUSTAFA, EXECUTIVE DIRECTOR
AND WENDY HILL HOUSE
CROYDON
CR0 1EA

HIGHWAY IMPROVEMENTS - PARKING DESIGN

Scale: NTS Drawn TOR Checked DW Rev. 00

Date: Drawing Ref.

APRIL 2019

PD 397

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REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 24 July 2019
SUBJECT:	OUTCOME OF FORMAL CONSULTATION ON SCHOOL STREETS
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place
CABINET MEMBER:	Councillor Stuart King, Acting Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	Bensham Manor, Crystal Palace & Upper Norwood, Kenley, Norbury and Pollard Hill, Purley Oaks & Riddlesdown, West Thornton
CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:	
<p>School Streets are intended to contribute to securing a healthy and safe environment near to schools, and to encourage children and parents use cars less and to walk, cycle and use public transport more.</p> <p>The School Streets support objectives in the:</p> <ul style="list-style-type: none"> • Corporate Plan 2018 – 2022. • Third Local Implementation Plan (LIP3). • Air Quality Strategy and Air Quality Actions Plan. • Croydon’s Public Health Strategy. • Croydon’s Community Strategy 2016 – 2021. 	
FORWARD PLAN KEY DECISION REFERENCE NO.: 2719ETR	
FINANCIAL IMPACT:	
<p>The required £395k capital expenditure will be fully funded from existing approved capital resources and the £210k revenue requirement will be fully funded from the issuance of Penalty Charge Notices arising from the implementation of this scheme. The costs of implementing the 7 School Streets structure will be operationally self-financing.</p>	
RECOMMENDATIONS:	
<p>That the Traffic Management Advisory Committee recommend to the Cabinet Member for Environment, Transport and Regeneration (job share) that they:</p> <ol style="list-style-type: none"> 1.1 Consider the objections and responses from the consultation on the Public Notice of 23 May 2019 (included in Appendix 1 to this report). 1.2 For the reasons detailed within the report to introduce School Street schemes under the permanent Traffic Management Order procedure in the following 7 locations as detailed in the Public Notice of 23 May 2019: <ul style="list-style-type: none"> • Abingdon Road (between Turle Road & Upwood Road), at Norbury Manor Primary School. • Biggin Way (between Biggin Hill & Downsview Road), at Downsview Primary and Nursery Schools. 	

- Brading Road (between Cecil Road & Lavender Road) and Rosecourt Road, at West Thornton Primary Academy.
- Cypress Road, at Cypress Primary School.
- Goston Gardens (between Winterbourne Road & Oaklands Avenue) and Winterbourne Road (between London Road & Wiltshire Road), at Winterbourne Girls and Boys Schools.
- Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.
- Little Roke Road (between Lower Road & the north-western flank wall of No. 47 Little Roke Road), at Harris Primary Academy Kenley.

2 EXECUTIVE SUMMARY

- 2.1 On 18 April 2019 and pursuant to the delegation under the Leader's Scheme of Delegation dated 26 June 2018, the Executive Director Place, following consultation with the Cabinet Member for Environment, Transport and Regeneration (job share) determined that it was appropriate to give Public Notice and formally consult on up to 8 School Street proposals. At its meeting on 2 May 2019 the Traffic Management Advisory Committee received a report on the result from an initial engagement and the decision to give Public Notice.
- 2.2 Roads with a school entrance are spaces where children and moving motor vehicles co-exist. Many such roads are experiencing illegal parking and often hostile traffic conditions at the start and end of the school day. The situation has health and safety implications for both children and adults. The situation is worsening, due to the continual growth in the number of cars on the road and a decade high peak in the number of children coming into school age. Regional and Local transport policies translate into a need for actions to help reverse the trend of an increasing number of children being driven to school.
- 2.3 A School Street, in present context, is a street with a school entrance which during the start and end of the school day is restricted to use by pedestrians and cyclists, with most motor vehicle traffic prohibited. The School Street is intended to contribute to securing a healthy and safe environment near to a school, and to help children and parents use cars less and to walk, cycle and use public transport more.
- 2.4 A Public Notice of consultation was given on 23 May 2019, inviting objections by 20 June 2019. The Notice and drawing for 7 proposed School Streets are included in Appendix 1 to this report.
- 2.5 24 objections were received from the 7 proposals. The consultation has not identified any material objections that would invalidate the objectives for introducing the 7 School Street schemes.
- 2.6 The report recommends the introduction of School Street schemes in the following 7 locations:

- Abingdon Road (between Turle Road & Upwood Road), at Norbury Manor Primary School.
- Biggin Way (between Biggin Hill & Downsview Road), at Downsview Primary and Nursery Schools.
- Brading Road (between Cecil Road & Lavender Road) and Rosecourt Road, at West Thornton Primary Academy.
- Cypress Road, at Cypress Primary School.
- Goston Gardens (between Winterbourne Road & Oaklands Avenue) and Winterbourne Road (between London Road & Wiltshire Road), at Winterbourne Girls and Boys Schools.
- Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.
- Little Roke Road (between Lower Road & the north-western flank wall of No. 47 Little Roke Road), at Harris Primary Academy Kenley.

2.7 The financial implications of implementing the 7 School Street schemes are £395k capital investment and full year revenue effect of £320k.

2.8 On 2 July 2019 and pursuant to the delegation from the Leader referenced above, determined that it was appropriate to refer consideration of the outcome of the formal consultation regarding the 7 School Streets to the Traffic Management Advisory Committee for onward recommendation and determination to the Cabinet Member for Environment, Transport and Regeneration (job share).

3 DETAILS

3.1 POLICY BACKGROUND

3.1.1 The Corporate Plan responds to National, Regional and Local policies and priorities. Amongst other objectives, the Plan sets out to support the development of a culture of healthy living, deliver the Air Quality Action Plan and tackling idling vehicles, in particular around schools¹.

3.1.2 The Air Quality Action Plan is a five year plan to improve air quality within Croydon.

3.1.3 The Third Local Implementation Plan (LIP3) reflects local plans and The London Mayor's over-reaching strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more. This requires amongst other things that a healthier and safer environment is established at the school entrance. The strategy requires that London Local Authorities reduce the volume of traffic by 5% by 2021².

3.1.4 The 2017 Annual Report of the director of public health identifies that Croydon currently has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. 7.5% of premature deaths in Croydon are linked to air pollution³.

The level of Croydon residents who regularly travel by active modes (walking and cycling) is lower than in each of our neighbouring 6 boroughs. Only 26% of Croydon residents undertake the minimum 20 minutes of active travel each day needed to stay healthy. One in three of our children are now overweight and two in three adults are overweight⁴.

Croydon's Community Strategy has as priority to secure a good start in life, improve health outcomes and healthy life expectancy, and to secure a safer, cleaner and greener borough⁵.

The school run presents a particularly harmful combination of air pollution and inactivity for children and parents. Air pollution is typically worse inside a car in congested traffic, compared to walking on the pavement.

3.2 EVIDENCE FOR SCHOOL STREETS

3.2.1 The School Street is a relatively young concept. In present context, it is a street with a school entrance which during the start and end of the school day is restricted to use by pedestrians and cyclists, with most motor vehicle traffic prohibited. The method for operating a Schools Street is described in Appendix 2.

3.2.2 The UK's continued growth in car ownership (+9% in the last 5 years, significantly faster than the +2.5% over the 5 years prior⁶) and a decade high peak in the number of children coming into school age (+22% compared to 10 years earlier⁷) are adding to the pressure in school roads. These causal factors follow economic and population cycles, which in Croydon are forecast to grow significantly above the UK average over the next decade. The naturally occurring cycles can therefore not be relied on to automatically resolve the traffic and parking situations at many junior and primary schools. The presently worsening situations cannot be resolved without introducing some form of discouragement to driving.

3.2.3 School street traffic at the start and end of the school day does of course not relate solely to the school run. In some school roads there is also an element of commuter traffic using the road as a so-called rat run. The amount of such commuter traffic is additionally influenced by the increased car use.

3.2.4 The increase in car use influences parents' perception of child safety, further persuading them to drive their child to school. This self-perpetuation element in the current situation demands a positive measure, to help reverse the unsustainable trend of an increasing number of children being driven to school for relatively short journeys.

3.2.5 Several school roads have reached saturation point at the start and end of school days – meaning that in the most severe places there is practically no road space left for the problem to change much for the worse. What is changing,

however, is the awareness of and attitude towards air pollution. Public opinion no longer tolerates the existing levels of traffic and air pollution.

In Croydon's online public engagement survey in September 2018², 86% of 994 respondents agreed that traffic levels are too high in Croydon and 72% agreed it should be lowered. 74% agreed they are concerned about air quality. 62% agreed they would use the car less if alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.

- 3.2.6 Croydon introduced 3 School Street pilot schemes under experimental traffic orders in 2017. The outcome was reported to this Committee on 4 July 2018. The then use of an experimental procedure, to appropriately enable amendments or reversal of the pilot schemes following learning, attracted criticism from some of those who participated in the post-installation consultation on the permanent traffic management orders. Nonetheless, the schools and residents within the 3 pilot zones responded favourable towards the schemes in the subsequent consultation.
- 3.2.7 The 3 School Street pilots are not isolated devices. Parallel information and training activities were undertaken by the school road safety team, under the STARS accreditation scheme. STARS is a TfL initiative for inspiring young Londoners to travel to school **sustainably, actively, responsibly** and **safely** by championing walking, scooting and cycling⁸.

Before and after surveys, precisely 1 year apart, have indicated the pilot schemes have significantly reduced car use. They identified a 15% (worst case) to 62% (best case) uptake in cycling, scootering and walking, and a 15% to 25% reduction in car use. The variances in the outcomes at the pilot schools are somewhat proportional to the car ownership and topology in the landscape near the schools – e.g. the biggest measured reduction in car use occurred at a school in the south of the borough where the latest 2011 census evidence that car ownership is more prevalent. The conversion is expected to be less where a school has a large catchment area, under-developed public transport, hilly surroundings or links to dangerous roads – where many parents currently do not feel any choice but to use the car.

It generally requires a relatively small change in the number of cars travelling in a road to make the difference between free-flowing traffic and obstructive congestion. When compensating for a low statistical confidence in the small number of samples in the existing data, it remains reasonable to conclude that the reduction in car use from the 3 existing School Street schemes and their combination STARS initiatives, has been significant, with more parents and children helped to use more active modes of travel.

- 3.2.8 Residents in roads neighbouring the 3 pilot schemes roads have raised concerns about feelings they had inherited the whole school run problem. However, the residual parking was evidently less in amount and it was dispersed over a wider area, compared to the prior situation surrounding the school entrance. The initial complaints from residents in neighbouring roads

have gradually ceased. Parents have needed time to adjust and find alternatives to using the car.

Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school or be dropped off further away from school and walk the last leg of the journey in a safer and healthier street. The School Street is highly symbolic in this respect. It is yet unknown if and to what extent a School Street scheme could affect future school choices.

3.2.9 The existing 3 School Streets in Croydon were in 2018 judged by 2 separate panels of parking and road safety opinion leaders. The School Streets received recognition as winning entries at the British Parking Association Awards (2018, parking in the community category) and the London Road Safety Awards (2018, outstanding contributions to road safety category).

3.2.10 A growing number of London boroughs are implementing School Streets. The Croydon officer with operational responsibility for School Streets attended a knowledge sharing session organised by London Borough of Hackney in December 2018, to discuss common issues, lessons learned and identify best practice. Discussions and comparisons made at this session, and the subsequent information exchanges with other boroughs within the network, has validated to officers that the Croydon approach to School Streets represents current best practice.

3.2.11 Air pollution data was not collected for the pilot schemes. Such surveys now form part of the recommendations in the present report.

3.2.12 The proposed School Street zones aim to be extensive enough to practically influence the traffic management objectives of reducing congestion and parking near to the school entrance, while being small enough to minimise the number of residents and businesses impacted by time restrictions on visitors and deliveries. A smaller zone results in a relatively shorter and more tolerable walking distance for visitors that at certain times must parking outside of the zone.

3.3 PRIOR ENGAGEMENT

3.3.1 A survey on the Air Quality Action Plan (AQAP) in July 2017 found 76% of 356 respondents rated their views on air pollution as 'very important' and a further 14% rated their views as 'important'. 88% agreed that the AQAP healthy streets initiatives are important. 84% agreed it is important to improve air quality awareness at schools.

3.3.2 A survey on the future of transport for the draft third Local Implementation Plan (LIP3) in September 2018 found that 74% of 994 respondents are concerned about air quality in Croydon and 72% agreed that traffic levels should be lowered.

3.3.3 A survey of the general public (not necessarily people in the vicinity of a school) on the draft Parking Policy, in March-April 2019, described the objectives and timeline for introducing emission-based parking charges. In this prior engagement:

- 30% of respondents expressly supports the School Streets policy and plan.
- 9% of respondents had one or more concerns about School Streets, including:
 - 5% of respondents expressed a concern that the School Street does not address displacement of problem into neighbouring roads.
 - 3% were concerned that the School Street does not address fact that parents need to be able to drive, due to work or school's large catchment area.
 - The remaining concerns related to the School Streets not addressing worsening congestion, pollution and noise on main roads; opinions that car travel is safer for children (from road traffic and crime); suspicion that the Council is using the schemes to raise income; and that School Streets reduce access for residents.

3.3.4 After writing to 93 primary and junior schools on 8 November 2018, 8 locations were selected for a possible School Street.

Table 1 – Schools selected for School Street consultation.

School	Post code	Ward
Norbury Manor Primary	SW16 5QR	Norbury and Pollards Hill
Fairchildes Primary School	CR0 0AH	New Addington South
Harris Academy Purley/Regina Coeli	CR2 6DT	Purley Oaks & Riddlesdown
Cypress Primary School	SE25 4AU	Crystal Palace & Upper Norwood
Winterbourne Junior Girls and Boys	CR7 7QT	Bensham Manor
Downsview Primary & Nursery	SE19 3XE	Norbury and Pollards Hill
Harris Primary Academy Kenley	CR8 5NF	Kenley
West Thornton Primary Academy	CR0 3BS	West Thornton

3.3.5 The outcome of the informal consultation on School Street was reported to this committee on 2 May 2019. This prior engagement reached 1,985 residents and occupiers in and immediately around the proposed School Street zones. The consultees were invited to reject or propose changes to the initial zone layout. In this prior engagement:

- 25% are opposed to the proposals.
- 69% are in favour of the proposals.
- 4% are in favour, on condition the zones extend further than proposed.
- 2% undecided.

3.3.6 As reported to this committee on 2 May 2019, the informal consultation near Fairchildes Primary School indicated a preference for a significant extension to the original proposal. After follow-up discussions with the secondary school and the children centre in the area, it was decided to re-consult residents informally with a revised proposal, this time enclosing a drawing that unambiguously shows the proposed extended zone. This matter is due to be considered further by the Executive Director Place under delegated authority.

3.4 STATUTORY CONSULTATION

3.4.1 The statutory consultation is concerned with the proposed 7 permanent schemes (not the proposed experimental scheme at Fairchildes). A Public Notice was given on 23 May 2019, with a 4-week consultation period until 20 June 2019 (see Appendix 1). The Notice details the proposed emission-based parking charges and invites objections. The communications plan for the Notice included:

- Publication in the London Gazette on 23 May 2019.
- Publication in the Croydon Guardian on 23 May 2019.
- Public Notices affixed to lampposts near to the 7 school entrances.
- Email notification to 23 interest groups throughout the borough, including the 3 emergency services and Transport for London.
- 1,010 consultation letters to residents and occupiers within and outside the proposed School Street zones.
- 1 Schools Bulletin article.

3.4.2 Parents are notified about the consultation through the schools and Public Notices placed near the schools entrances.

3.4.3 Total unique 75 responses were received by end of 20 June 2019, of which 24 (32%) are objections and 51 (68%) are in support of the schemes. 3 respondents objected to all 7 schemes. 1 respondents objected to 2 schemes. Table 2 shows to total number of objections and responses in support per scheme.

Table 2 – Responses by schemes

Scheme	Objections	Support
Abingdon Road, at Norbury Manor Primary School.	6	5
Biggin Way, at Downsview Primary and Nursery Schools.	5	5

Brading Road and Rosecourt Road, at West Thornton Primary Academy.	3	6
Cypress Road, at Cypress Primary School.	8	37
Goston Gardens and Winterbourne Road, at Winterbourne Girls and Boys Schools.	4	6
Kendra Hall Road, at Harris Academy Purley and Regina Coeli Primary School.	6	9
Little Roke Road, at Harris Primary Academy Kenley	10	6

The statutory procedure requires that the authority consider the responses to the formal consultation and provide responses to objections where these objections have not resulted in changes being made to the proposals and detailing the reasons why this is the case. The 51 statements in support for the emission-based permit charges are noted, but do not require a response under the statutory procedure. They will nonetheless receive a reply acknowledging their contribution.

Table 3 – Objections and the officer’s responses.

<p>Objections and concerns about School Streets in general (applicable to all proposed locations) and officer’s response</p> <p><i>“Implementing school streets just pushes the amount of cars back to other surrounding roads that are not included in the scheme.</i></p> <p><i>This is just a money making scheme branded as something for the benefit of children. If these parents needed to bring their cars home before walking to school or walk to school then returning home to collect their car to drive to work there would be negative repercussions for all”.</i></p> <p><u>Officer response:</u></p> <p>The scheme will result in an initial displacement of the residual car travel, with some school children being dropped-off and picked-up in neighbouring roads. However, this effect is reduced in amount, as result of a switch from car travel to walking and cycling, and is dispersed over a wider area.</p> <p>Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.</p> <p>The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use. Parents have needed time to adjust and find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.</p> <p>The revenue from the School Street scheme is expected to pay back the installation costs in under 3 years. Using the schemes as a means to raise</p>

income would be inconsistent with the Road Traffic Regulations Act 1984. Any surplus from penalty charges are ring-fenced to highways and transport schemes and, for example, contributes significantly to sustaining public transport fare concessions such as the Freedom Pass.

“Live next to Woodcote Primary School, where the scheme has simply displaced traffic onto neighbouring roads, increasing congestion and pollution. The school is in a Ptal 1a area - meaning little or no public transport - so a lot of parents have little or no alternative. There was no council support (ie traffic patrols) since the early days of the scheme. Since implementation the school catchment has ballooned to over 15km - meaning even more/longer car journeys”.

Officer response:

The Woodcote School Street was an experimental scheme and lessons learnt from the pilot areas have been incorporated within the scheme proposals going forward. Residents within the pilot scheme area have remained in favour and a significant number of children are now walking, scootering or cycling to schools, where previously they were driven by car.

The newly proposed schemes are in areas which are rated by Transport for London to have a Public Transport Accessibility Level (PTAL) of at least level 2.

The newly proposed schemes will have parking enforcement officers present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

The latest catchment area data for Woodcote school shows that the children on average live 1.7km walking distance from the school. 75% of children live within 2km.

“What happens if this is rolled out on a wider basis across all schools in the borough? Will residents who rely on their cars not be allowed to leave their homes during school opening/closing times - is this not controlling the lives of the public?”

Officer response:

Not all school locations are suitable for a School Street. In the current round of schemes, half of requests were found to have unfavourable conditions.

Residents and occupiers within a School Street zone are eligible for driving in the street at any time – i.e. they are not affected by the restrictions. There are also concessions in place for visitors to people with care needs.

Objections and concerns about School Streets in **Abingdon Road** at Norbury Manor Primary School, and officer's response

"How will increased traffic in adjoining roads be restricted?"

Officer response:

Experiences from introducing School Streets in other locations demonstrate that an initially traffic increase in the adjoining roads can be expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

The Council can consider traffic and parking control measures, in places where residual displacement remains unacceptable.

"I am a resident on Colebrook Road and I object".

Officer response:

The objection is noted.

"I live on Upwood Road and I need access to Abingdon Road within those hours 14-16 I don't want any restrictions. THIS IS RIP OFF!"

Officer response:

The objection is noted. The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance.

Objections and concerns about School Streets in **Kendra Hall Road** at Harris Academy Purley and Regina Coeli School, and officer's response

"My children attend and due to my active links with the school I am required to attend the school or bring a large amount of items during the proposed pedestrianised period. There are also those with mobility difficulties, which in some cases is my hindrance also. I am also intrigued to know what the proposal would be for residents who also drive and need to leave or return during the proposed times. Personally the illogicality of parents who can see that KHR is busy or blocked are the problem as appose to the pollution on that road. As much of the pollution is Pampisford Road".

Officer response:

The school has authority to allocate a permit to its regular on-site visitors. Residents and people with recognised mobility or medical issues, who need access to amenities within the School Street zone are eligible for a permit. In accordance with the Highway Code for the particular traffic sign, it is the act of driving into the road that is restricted. Driving out of the road is permitted at any time. The scheme is considered in part because parents have difficulty judging the extent of congestion in Kendra Hall Drive before they drive into the road. The scheme will eliminate this problem.

“I live in Columbine Avenue, the next road down so while you remove one problem, you’re moving it into the neighbouring road. The traffic flow here is horrendous at school drop off and pick up. Cars waiting with engines running I’m not sure how any of this is helping children that live here. Low emission zones should be for all. You’re just implementing this for revenue it seems”.

Officer response:

The initially anticipated traffic increase in the adjoining roads is expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

The conditions in Columbine Avenue can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

“My concern is that drivers will park on the drive and block the entrance to our flats [Felbridge Court]. This already currently happens, on 1 occasion I could not leave to get to a hospital appointment and other residents were also blocked from leaving. My fear is that this will only get worse”.

Officer response:

The conditions in Pampisford Road can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment

and acceptance of poor parking practices, while parents find alternatives to the car.

Objections and concerns about School Streets in **Cypress Road** at Cypress Primary School, and officer's response

"Nil".

Officer response:

The objection is noted.

"Relatives live in Sunset Gardens cul de sac and no other way to access their property other than via Cypress Road and need to visit at lunch time and early afternoon".

Officer response:

The Public Notice, section 2, clarifies that residents in Sunset Gardens would become eligible for an exemption permit.

"Proximity to the closest parking space outside of the zone is too far away for relatives to visit during the school street hours. I have elderly parents and siblings with two young children. Will negatively affect house value. Will financially impact us as residents due to having to book specific delivery slots for any type of delivery or service instead of an all day option. School street hours are too long and limiting. Issue is not that much of a problem for this to be implemented, the school street scheme is supposed to help not hinder residents. Suggestion to make the Cypress road and sunset gardens a no stopping zone with camera to implement fines for any drop offs or stopping (not parking)".

Officer response:

Relatives or carer who visit a resident who is recognised as elderly frail or disabled and who is dependent on such visits are eligible for an exemption permit. Experienced delivery service companies would not attempt to deliver during the peak school times under the current conditions, when the road is practically impassable and there is not kerb space available for unloading. An all-day delivery option would therefore tend to practically translate into an off-peak time anyway. The School Street hours need to be long enough to discourage driving, including parents arriving earlier and wait for longer in their cars in the afternoon. No assessment has been made with regards to house values, but the scheme is intended to improve safety and public realm in the road. The use of CCTV and ANPR for parking enforcement on the street was restricted by the Deregulation Act 2015,

including in relation to parking contraventions of this nature and is therefore no longer a permitted method as suggested.

"I object. My children go to Cypress Primary".

Officer response:

The objection is noted.

"1. We are concerned that the knock on effect on other nearby roads, in particular on Auckland Road and South Norwood Hill which we feel will become overly congested as a result as people look for alternative parking

2. We feel that the 08.00 till 09.30 in the morning and 14.00-16.00 the proposed timing restrictions are far too long and will have a unfair impact on local residents

3. What impact this will have on deliveries and suppliers trying to access local residents?

4. We are concerned that once the system is put in place there might be future proposal to introduce a parking permit scheme which will provide a further tax on the local residents. This is unacceptable.

5. In your response to the frequently asked questions you mentioned that conventional parking enforcement patrols only have limited short term effect. In the 12 years that we have lived in this area we have never seen a parking enforcement officer in the proposed restricted zone. We feel that even having a presents one or two times a week would have a significant improvement on the current situation. As it will change the behaviour of those dropping off or picking up children.

In addition to the above we have further concern that congestion zone is enforced all year around and does not take into account school holidays and bank holidays which puts unnecessary constrains on the local residents even when the school is not working. Would it be possible to suspend the School Street Zone during school holidays?

Would it be possible to relax the School Street Zone constrains for prearranged construction work and deliveries?

In summary, we do believe that something needs to be done to address the currently unacceptable traffic and parking problems at drop off and pick up times which will in turn improve road safety for walking children to school. However we do not agree with your proposal as planned for the restricted zone".

Officer response:

1. Schemes will result in an immediate displacement in neighbouring roads. This will be smaller in overall numbers and dispersed over a wider area.

Parents will need time to adjust and find alternatives to using the car. 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school. Traffic engineers are already working with residents in Auckland Road on identifying new measures to help their situation. The plan is to coordinate the Cypress Road School Street with these other measures.

2. The times are identified as necessary. For example, if the restriction is not in place at least 1 hour before end of school day, then experience shows that parents simply show up in advance and remain parked for longer. The act of driving into the street is restricted, and anyone may in fact drive out of the street at any time.

3. The restriction on visitors is a downside to the scheme, which has been weighed against the benefits the scheme brings. Visitors/relatives to residents with a care needs or, say, a daily in-home childminder are eligible for an exemption. Tradesmen and builders carrying out work inside the zone are eligible for an exemption.

4. Controlled parking and parking permits are only introduced where a majority of residents asks for it. One view on the school street is that it resolves a peak time parking problem and may in fact make it less likely for residents requesting parking controls.

5. Cypress Road already receives the additional parking enforcement patrols. Regrettably, this system is proving ineffective in achieving compliance with the parking restrictions and it does nothing about the number of cars entering into the road. The School Street is intended to address this.

The zone will only be enforced during school term. The scheme must use a legally approved road sign. The Department for Transport has not yet given approval to a pedestrian zone sign saying "during school term only". There is a concern that many drivers would be unable to know whether a particular school is in term or not. A London-wide working group are investigating possible options in this area, subject to subsequent approval by the Department for Transport.

Objections and concerns about School Streets in **Goston Gardens and Winterbourne Road**, at Winterbourne Junior Girls, Boys and Nursery Schools, and officer's response

"I object to this scheme. I live in Oaklands Avenue, which is directly next to Winterbourne Road. Your proposed street scheme for Winterbourne will cause chaos. Currently, school traffic uses, and parks, in Oaklands Avenue to the extent that it is hard to drive down Oaklands or find a parking space during the school runs. Winterbourne parents often park in Oaklands, Goston Gardens and even as far as Warwick Road. By stopping parents using Winterbourne Road you will simply make the surrounding roads even worse than they are now. It won't stop parents using their cars as I'd

imagine a lot of them are trying to get to work and have to drive to try and be on time. It would be better if the school arranged for a walking bus, or an actual bus that picked up at fixed points away from the school”.

Officer response:

The initially anticipated traffic increase in the adjoining roads is expected to ease off, as parents find alternatives to using the car. Parents become informed and socially influenced by observing other parents, demonstrating that children can walk to school.

The conditions in Oakland Avenue can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report issues. A mobile patrol is usually quick to attend. The situation in Oakland Avenue will be monitored, with view to consider additional measures if necessary.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

“As a long term residents of Winterbourne Road and living right opposite the school, I am totally object to this proposed pedestrian zone outside schools. It is very inconvenient for us residents. Though we have put up with mornings and afternoon runs but its fine for us. The parents should consider themselves leaving the cars outside Winterbourne (near the school) and walk their children to school, or they should not stop the cars in the rushnow on the street - to let their children out (this is where congestion happens). Hop you understand and take our opinion serious”.

Officer response:

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance.

The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use.

Objections and concerns about School Streets in **Biggin Way** at Downsview Primary School, and officer’s response

“The proposal to limit restrictions to only Biggin Way will increase the number of "drop offs" by approx 50% when using the Marston Way entrance. Biggin Hill has a left hand bend at White Lodge followed by the steepest part to Marston Way. The present congestion, bad driving, u-turns performed in this section has to be seen to be believed. Unless the restricted zone is increased to include Biggin Hill

it will cause even more chaos than already exists, and defeat the sole object of the restricted zone. Please explain the current thinking behind the proposal to only restrict Biggin Way”.

Officer response:

The plan is to consider Marston Way for a School Street in 2020, once the ongoing construction works and related construction traffic has completed. The School Street zone start and end points must be set at appropriate road junctions, to present drivers with a realistic opportunity to select an alternative route and to avoid leading cars into a dead-end road system where it is difficult to turnaround. The length and steep section of Biggin Hill presents a difficulty in achieving this. The wider zone would effectively have to include the full length of Biggin Hill, from Beulah Hill to Brickfield Road. The Council and the community’s experiences of School Streets are not extensive enough to reliably predict the consequences of enclosing so many residential addresses. It is a scheme that can be reconsidered at a future date, once more experience is established and if more residents naturally wants such a solution. The scheme in Biggin Way is a more manageable size, for starters.

The conditions in the area can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line to report an issue. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the neighbouring roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

“I object to this scheme as I reside on Biggin Hill and the traffic at school start and finish times is horrendous. Parents park on curbs, grass and across residents’ driveways. Now the only entrance with vehicle access is right opposite our house facing Marston Way. There is road rage on a daily basis and never anyone to oversee congestion and the bloody mindedness of selfish individuals. Restrictions on Biggin Hill need to be in place and in conjunction with the undertaking of works on Biggin Way otherwise somebody will end up seriously hurt”.

Officer response:

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance. The 3 pilot schemes have resulted in a significant uptake in children walking and a reduction in car use.

The conditions in the area can be challenging at the start and end of the school day already. Any resident can telephone the parking enforcement hot line. A mobile patrol is usually quick to attend.

Parking enforcement officers will be present in the roads for the first weeks of the scheme becoming live, to prevent the establishment and acceptance of poor parking practices, while parents find alternatives to the car.

Objections and concerns about School Streets in **Little Roke Road** at Harris Primary Academy Kenley, and officer's response

"Parents with younger siblings need access to the school gates (or nearby) as is currently available".

Officer response:

Parents and children for whom circumstances demand a continued use of the car must be parked further away from the school entrance and walk the last leg of the school journey. The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. This requires that a healthier and safer environment is established at the school entrance. The 3 pilot schemes have resulted in a significant uptake in primary school children walking and a reduction in car use.

"I am not happy for this to go ahead. I often have deliveries coming to the house usually in the morning when I am at home. This restriction will be an inconvenience to my day to day activities. I also have family and friends who come to visit in the day so again this will be a nuisance to them".

Officer response:

The restriction on visitors and deliveries is a downside to the scheme, which has been weighed against the benefits the scheme brings. Visitors/relatives to residents with a care needs or, say, a daily in-home childminder are eligible for an exemption. Tradesmen and builders carrying out work inside the zone are eligible for an exemption.

The proposed road sign restricts driving into the street. Visitors can in fact remain legally parked and do not have to clear the road when it comes into operation. Visitors can drive out of the zone at any time.

"Will residents in Little Roke Avenue be exempt? I find the information and communication have been very poor. During the school run times, parking is fine, just more traffic. The problem is not being able to find any parking in the evenings after work".

Officer response:

Residents in Little Roke Avenue would become eligible for permits for driving into the School Street. This is stated in the Public Notice.

The School Street is intended to help children and parents to use cars less and to walk, cycle and use public transport more. It is not concerned with evening parking.

“The area marked for the pedestrian zone would affect Little Roke Avenue as well as this is the only way into the road although it is not a school road itself. Thus causing disruption to residents and visitors during school morning and afternoon times”.

Officer response:

The residents’ survey in February 2019 found a majority view in favour of the current proposal, as opposed to a smaller zone starting at the junction with Little Roke Avenue, hence affecting Little Roke Avenue. Residents in Little Roke Avenue are eligible for exemption permits, which permit them to drive in the zone at any time.

“A Controlled parking zone down Lower Road would be completely un-reasonable”.

Officer response:

The consultation is not concerned with a controlled parking scheme suggested for Lower Road.

“I would like to register my objection to the proposed pedestrian zone in Kenley. I Live in Little Roke Avenue and do not agree with the proposed plan for controlled parking. There is no parking issue in the road during the hours proposed”.

Officer response:

The scheme is concerned with encouraging less car driving and road safety. It is not concerned with parking. Resident parking and driving remain unrestricted during the hours of operation of the proposed scheme.

Objections and concerns about School Streets in **Brading Road and Rosecourt Road**, West Thornton Primary Academy, and officer’s response

No specific objections are received for this location. 3 general objections covering this scheme are listed above.

3.4.4 24 objections is a low number, considering the amounts of communication detailed in section 3.4.1 above. 2 of the 24 objections have confused the School Street with controlled parking.

- 3.4.5 In conclusion, the consultation has not identified any material objections that would invalidate the objectives for introducing of the proposed 7 School Streets.
- 3.4.6 Under section 122 of the Road Traffic Regulations Act 1984, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians. The School Streets addresses objectives in the Third Local Implementation Plan (LIP3) and The London Mayor's over-reaching strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more. This requires amongst other things that a healthier and safer environment is established at the school entrance.
- 3.4.7 Subject to the Cabinet Member for Environment, Transport & Regeneration (Job Share) agreeing to the recommendations in this report, each of the objectors will receive responses based on the officer comments in Table 3 above.

3.5 PRIVACY AND DATA PROTECTION

- 3.5.2 The informal consultation letter described to residents and occupiers how the proposed School Street would be enforced using ANPR cameras. Residents will receive a further notification letter prior the scheme start, including being informed that the cameras are registered with the Information Commissioner's Office (ICO).
- 3.5.3 ANPR is widely used in Croydon and beyond and are proven to feasibly operate within the Surveillance Commissioners Codes of Practice. Every individual ANPR camera will require a Data Protection Impact assessment (DPIA) to ensure its compliance. A DPIA is one of the ways that a data controller such as the Council can check and demonstrate that the processing of personal data is compliant with the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA) 2018. There are statutory requirements to carry out a DPIA in Section 64 DPA 2018 and article 35 of the GDPR.
- 3.5.4 Section 6(1) Human Rights Act (HRA) provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights (ECHR). Therefore, in addition to the above, as a public body the Council must make sure that the systems comply with HRA requirements. Whilst the particular human rights concerns associated with surveillance tend to be those arising from Article 8 which sets out a right to respect for privacy, surveillance does also have the potential to interfere with rights granted under other Articles of the ECHR such as conscience and religion (Article 9), expression (Article 10) or association (Article 11).
- 3.5.5 The ANPR camera in question will be positioned so as to focus strictly on the traffic entry point to the street. The ANPR camera cannot be turned or used for any other purpose, such as for monitoring other users of the road or recording anti-social behaviour. Recordings are triggered solely on the detection and for the duration of a driving contravention.

3.5.6 Subject to approval for implementation of the scheme, the necessary privacy and data protection assessments will be made and any mitigating actions implemented prior to the cameras being switched on to collect images. If the assessments identify a high risk to privacy that cannot be mitigated adequately, data protection law requires that the Council must consult the ICO before starting to process personal data.

3.6 IMPLEMENTATION

3.6.1 Subject to the decision to proceed, the implementation of the 7 School Streets will be scheduled for the first 3 schemes being in place in September 2019 and the remainder by January 2020. The current draft Traffic Management Orders will be finalised and signed prior to the schemes installation.

Table 4 – Schools selected for School Street consultation.

#	School	Anticipated introduction
1	Norbury Manor Primary	September 2019
2	Downsview Primary & Nursery	September 2019
3	Harris Academy Purley/Regina Coeli	September 2019
4	Winterbourne Junior Girls and Boys	October 2019
5	Harris Primary Academy Kenley	October 2019
6	West Thornton Primary Academy	Before January 2020
7	Cypress Primary School	Before January 2020

Note: The 8th scheme at Fairchildes Primary School is due to be considered further by the Executive Director Place under delegated authority.

3.6.2 Parking pressure surveys have been conducted, to enable a before and after assessment of the impact on parking in neighbouring roads.

3.6.3 Air pollution surveys are in process of being conducted, to enable a before and after assessment of air quality near the school entrance.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Implementing the recommendations of this report will commit the Council to £395k capital expenditure for the purchase of CCTV equipment and approximately £210k revenue expenditure to fund 3.5 new employee posts at scale 6 to deliver the service. £532k additional revenue is anticipated to be generated in a full year from the issuance of Penalty Charge Notices (PCNs).

The capital expenditure will be funded via £320k allocation from the Traffic CCTV Upgrade project and 75k allocation from the School Street ANPR project. The revenue expenditure will be wholly funded from the revenue generated from the additional issuance of PCNs and any surplus revenue from the scheme

will contribute to the overall cost of the Council's transport and traffic management programme.

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000
Revenue Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				
Expenditure	104	211	215	219
Income	(178)	(532)	(532)	(532)
Remaining budget	<u>(74)</u>	<u>(321)</u>	<u>(317)</u>	<u>(313)</u>
Capital Budget available				
Expenditure	75	0	0	0
Effect of decision from report				
Expenditure	320	0	0	0
Remaining budget	<u>395</u>	<u>0</u>	<u>0</u>	<u>0</u>

2 The effect of the decision

The School Streets have a staged introduction, anticipated to commence in 3 locations in September 2019. The costs of implementing the 7 School Streets structure will be operationally self-financing.

3 Risks

Compliance and car use will change. PCN revenue has reduced 34% at the pilot sites, and 18 months on, the compliance is still improving (i.e. revenue is continually reducing). The schemes remain self-financing and brings important value through the road safety and air quality objectives.

4 Financial options

Substituting the School Street scheme with the STARS behaviour change scheme (see sec 3.2.7). This option, in isolation, will produce a lesser outcome. The proposed School Streets will part fund the essential parallel behaviour change activities.

Substituting the School Street scheme with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzag would be more resource demanding and less effective – i.e. is financially less efficient. It could help alleviate illegal parking, but it would not address car use and congestion. It would therefore not contribute to the desired change in car use behaviours.

Installing the scheme signs, initially without ANPR enforcement, and rely on incidental police enforcement for ensuring compliance. The cameras account for 70% of the capital expenditures, which could be postponed until affordable in future years. However, this would reduce the schemes effectiveness.

5 Future savings/efficiencies

ANPR cameras are a less resource demanding, more efficient approach to traffic and parking enforcement. The average operational cost per enforcement action will become lower from introducing ANPR camera schemes, such as School Streets.

6 *Approved by, Kate Bingham, Head of Finance on behalf of the Director of Finance, Investment and Risk and S151 Officer*

5 COMMENTS OF THE SOLICITOR TO THE COUNCIL

5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance & Deputy Monitoring Officer that Sections 6, 124, Schedule 1 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) among other matters, which prescribe streets which are not to be used for traffic by vehicles, or by vehicles of any specified class or classes, either generally or at specified times.

5.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

5.3 There are separate rules for experimental orders, as set out in Regulations 22 and 23 of the 1996 Regulations. These provide that the provisions on publication of proposals objections that apply to permanent orders shall not apply to an experimental order. However, no provision of an experimental order

shall come into force before the expiration of the period of seven days beginning with the day on which a notice of making in relation to the order is published.

- 5.4 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as 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. These powers must be exercised so far as practicable having regard to the following matters:-
- The desirability of securing and maintaining reasonable access to premises.
 - The effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - The national air quality strategy.
 - 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.
 - Any other matters appearing to the Council to be relevant.
- 5.5 The Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 5.6 High Court authority confirms that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 5.7 Section 149 of the Equality Act 2010 sets out the public sector equality duty in relation to the protected characteristics – i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. The public sector equality duty requires public authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation.
 - Advance equality of opportunity, and
 - Foster good relations between those who share a protected characteristic and those who do not.
- 5.8 Part of the duty to have “due regard” where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.
- 5.9 The Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

- 5.10 Where ANPR is used, the Council must ensure it adheres to the Surveillance Commissioner Guidance and Information Commissioner Guidance, where appropriate. This will include ensuring that adequate Data Protection Impact assessments are undertaken prior to progressing any schemes using ANPR to implementation.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

6 HUMAN RESOURCES IMPACT

- 6.1 The operation of 7 additional School Street schemes will demand increased permit administration, enforcement duties and Penalty Charge Notice processing. The activities will be highest at the outset, while residents obtain exemption permits and motorists are becoming aware of the schemes. A review of the activity index calculates that 3.5 additional FTE posts will be required. The posts must be in place at least 1 month in advance of the School Streets commencing, while capacity for completing prior induction and training exists. It is recommended not to increase the establishment, but to fund the temporary posts from parking revenue while the schemes settle.

The immediate HR impact is the recruitment to extra posts which will require Finance approval. Otherwise there are no other HR issues and if any arise these will be managed under the Council's policies and procedures.

Approved by Jennifer Sankar, Head of HR Place & Gateway, Strategy and Engagement on behalf of the Director of Human Resources, Sue Moorman.

7 EQUALITIES IMPACT

- 7.1 An Equality Analysis (EA) has been undertaken and was reviewed in response to the engagement on the Parking Policy and its section School Streets. The EA concludes that any equality and inclusion issues are incorporated and mitigating actions put in place.
- 7.2 Concerns raised in the informal consultation about reduced access to disabled and elderly frail residents are mitigated by making the motor vehicles belonging to the following groups of drivers eligible for an exemption permit, to enable them driving in the School Street during the hours of operation:
- a) Schools buses and vehicles used in the transport of children and adults with special access needs, including private vehicles, taxis and minicabs declared for such use. The school may also request a

temporary permit to enable car access for, say, a parent in a later stage of pregnancy or child with a temporary injury affecting mobility.

- b) Essential health and care visitors, including relatives of vulnerable residents.

The exemption permit is simply an electronic record in the compliance system and there is no need to physically affix anything to a vehicle. The permit is currently free (£0.00) and requested by email.

Motor vehicles belonging to the following groups and situations are automatically permitted to drive in a School Street, without first obtaining an exemption permit:

- c) Emergency services.
- d) Statutory Undertakers.
- e) Local Authority in pursuance of statutory powers, including refuse collection.
- f) Exemptions stated in the Highway Code, such as a medical emergency or with the permission or at the direction of a police officer.

Approved by: Yvonne Okiyo, Equalities Officer

8 ENVIRONMENTAL IMPACT

- 8.1 The School Street schemes are expected to improve air quality at the school entrance. The reduced car use will further contribute to reducing congestion and air pollution in a wider area. It is recommended to quantify this improvement for future considerations, by measuring the air quality before and after introducing the presently proposed schemes.
- 8.2 The zone signs are designed to meet the Department for Transport specification and will naturally fit the street scheme. The addition of signs and cameras within the public realm is compensated for by reducing the visual impact of congested traffic and parking.

9 CRIME AND DISORDER REDUCTION IMPACT

- 9.1 Hostility and aggressive behaviours are presently daily occurrences experienced by driving parents, other road users, school staff, residents and parking enforcement officers. The disorderly behaviours can be intimidating and sets a bad example to the high number of children that concentrate near the school entrance. The School Street schemes can significantly reduce and displace such disorder away from the school entrance.

10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 10.1 The Council has tried various options to reduce traffic and parking stress and improve safety around schools, including yellow line parking restrictions and enforcement. These measures have had limited success and cannot address moving traffic with regards to resolving congestion and discouraging car use. The School Street pilots have been successful as described in this report so the recommendation is to introduce more such schemes where appropriate and in agreement.

11 OPTIONS CONSIDERED AND REJECTED

- 11.1 The alternative option of not proceeding with the formal consultation would be a missed opportunity to relieve children, parents and residents from obstruction, road safety and air quality problems resulting from traffic and parking problems.
- 11.2 Increasing the conventional presence of Civil Enforcement Officers (CEOs) at peak times, as an alternative to the School Street, is already practiced at problem locations. The persistence of complaints about parking pressure and non-compliance demonstrate parking enforcement to be insufficient in resolving the chaotic and, at times, hostile traffic conditions, which occurs in the space where children and cars co-exist. CEOs do not have powers to direct or enforce moving traffic with regards to resolving congestion and discouraging car use. The lower financial efficiency of deploying CEOs also makes this option unaffordable in the longer term.
- 11.3 The Council, and the London Mayor's office, are already working with schools and parents in other ways to try encourage less car use; but nothing has yet emerged as equally effective as incorporating the School Street in the bigger scheme of helping to reverse the trend of the many more children now being driven to school.
- 11.4 In the prior informal consultation in February 2019, respondents made 2 specific suggestions to replace the then proposed School Street zone at Winterbourne Road with a one-way scheme with no-entry from London Road instead, which was considered. This was considered then, as an alternative to School Streets in general. However, it would not reduce the quantity amount of traffic and air pollution. It would not help to secure a perceivably healthy and safe street for pedestrian school children, as is necessary to convince parents to give up using the car. By example, the schools and residents with first-hand experiences of the existing equivalent no entry system in Cypress Road have indicated a continued problem and they support the additional introduction of a School Street.

CONTACT OFFICER: Sarah Randall, Head of Parking, Extension 60814

APPENDICES TO THIS REPORT

Appendix 1 – Public Notice, ref: PD/CH/K15 of 23 May 2019.

SUPPORTING DOCUMENTS

1. <https://democracy.croydon.gov.uk/ieDecisionDetails.aspx?AllId=1181>
2. <https://www.croydon.gov.uk/transportandstreets/policies/third-local-implementation-plan>
3. <https://www.croydon.gov.uk/democracy/dande/policies/health/annual-public-health-report>
4. <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Healthy%20W eight%20Action%20Plan%202017-2020.pdf>
5. https://www.croydon.gov.uk/sites/default/files/articles/downloads/Community_ Strategy_2016_21.pdf
6. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716075/vehicle-licensing-statistics-2017-revised.pdf
7. <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2017>
8. <https://stars.tfl.gov.uk/About/About>

BACKGROUND PAPERS:

None

PUBLIC NOTICE

CROYDON COUNCIL

PROPOSED PEDESTRIAN ZONES OUTSIDE SCHOOLS – ABINGDON ROAD, BIGGIN WAY, BRADING ROAD, CYPRESS ROAD, GOSTON GARDENS, KENDRA HALL ROAD, LITTLE ROKE ROAD, ROSECOURT ROAD AND WINTERBOURNE ROAD, THE CROYDON (PRESCRIBED ROUTES) (NO.K15) TRAFFIC ORDER 2019

1. NOTICE IS HEREBY GIVEN that Croydon Council propose to make the above Traffic Order under Section 6 and 124 of Part IV of Schedule 9 of the Road Traffic Regulation Act 1984, as amended and all other enabling powers.
2. **The general effect of the Order would be to prohibit any motorised vehicle entering the streets/sections of streets listed below between 8am and 9.30am and between 2.00pm and 4pm, Monday to Friday, with an exemption for those holding a valid permit issued by the Council. Note: Residents and businesses of streets accessed only from the streets listed below (i.e. Downsview Gardens, Little Roke Avenue and Sunset Gardens) would be eligible for exemption permits.**

Roads
a) Abingdon Road (between Turtle Road & Upwood Road)
b) Biggin Way (between Biggin Hill & Downsview Road)
c) Brading Road (between Cecil Road & Lavender Road)
d) Cypress Road
e) Goston Gardens (between Winterbourne Road & Oaklands Avenue)
f) Kendra Hall Road
g) Little Roke Road (between Lower Road & the north-western flank wall of No. 47 Little Roke Road)
h) Rosecourt Road
i) Winterbourne Road (between London Road & Wiltshire Road)

3. A copy of the proposed Order and all related documents can be inspected until the last day of a period of six weeks beginning with the date on which the Order was made or, as the case may be, the Council decides not to make the Order, between 9am and 4pm on Mondays to Fridays inclusive at the Enquiry Counter, "Access Croydon" Facility, Bernard Weatherill House, 8 Mint Walk, Croydon, Surrey, CR0 1EA.
4. Further information may be obtained by telephoning Parking Services, Place Department, Croydon Council on **020 8726 7100**.
5. Persons desiring to object to the proposed Order should make a statement in writing of their objection and the grounds thereof on the "Have your say" page at www.croydon.gov.uk. Alternatively write to the Parking Design Section, Place Department, 6th Floor, Zone C, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or email Parking.Design@croydon.gov.uk quoting the reference PD/CH/K15 by 20 June 2019.

Dated this 23 May 2019
Mike Barton, Highway Improvement Manager
Place Department

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