

REPORT TO:	TRAFFIC MANAGEMENT ADVISORY COMMITTEE 14 OCTOBER 2020
SUBJECT:	PARKING CHARGES REVIEW JANUARY 2021
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>Croydon's Parking Policy 2019-2022 supports the following corporate strategies and policies:</p> <ul style="list-style-type: none"> • Our Corporate Plan for Croydon 2018-2022 • Air Quality Action Plan 2017-2022 • Croydon Local Plan • Health and Wellbeing Strategy • Local Implementation Plan (LIP3) • Croydon Cycling Strategy 2018-23 <p>Croydon's Parking Policy 2019-2022, sets out that parking charges are operated in accordance with the Road Traffic Regulations Act 1984, including having regard to the desirability of securing and maintaining reasonable access to amenities and to the National Air Quality strategy.</p>	
FINANCIAL IMPACT:	
<p>The required capital expenditure of £150k will be funded from the 2020/21 capital programme. The scheme will result in between £748k (without emission-charges) and £1,023m (with emission-charges) additional income in-year, subject to the outcome from the pending consultation on emission-based parking charges.</p>	
KEY DECISION REFERENCE NO.: 5120ETR	
RECOMMENDATIONS:	
<p>The Committee is recommend to:</p> <ol style="list-style-type: none"> 1.1 Agree, for the reasons detailed in this report, to amend the existing Traffic Management Orders to effect a 30p per 30min increase in the P&D parking bay charges and to advise the Cabinet Member for Transport and Environment (job share) accordingly. 1.2 Note that the recommended 30p per 30min increase would coincide with the implementation of emission-based banded parking charges, as agree by Cabinet 25 March 2019. 	

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| 1.3 | If it is agreed to proceed, delegate to the Highway Improvement Manager, Public Realm Directorate the authority to give a Public Notice of variation. |
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2 EXECUTIVE SUMMARY

- 2.1 Revising the parking charges has the traffic management purpose of managing kerb side demand and influencing car use, to support general accessibility to amenities and in response to overarching national, regional and local drivers for addressing the borough's air quality and public health challenges.
- 2.2 The resulting detailed charges are listed in Appendix 1 and 2.
- 2.3 For clarity, the recommendation does not extend to or affect the following parking and permit related charges:
- Residential, business and other parking permits.
 - Disabled Blue Badge parking concessions.
 - The 460 district centre currently 1-hr free bays that are subject to a consultation under the emission-based parking charges scheme.
 - Charges associated with parking bay suspension and dispensation.
 - School Street access permits.
- 2.4 Subject to the recommendations being agreed, the statutory procedure defined in the RTRA1984 requires the publication of a Public Notice of variation minimum 21 days in advance of the implementation date. It is recommended the revised parking charges could eventually take effect on 1 January 2021 and be fully implemented by 15 February 2021, to coincide with the introduction of emission-based banding.
- 2.5 The required capital expenditure of £150k will be funded from the 2020/21 capital programme. The scheme will result in between £748k (without emission-charges) and £1,023m (with emission-charges) additional income in-year, subject to the outcome from the pending consultation on emission-based parking charges. This income is ring-fenced to the Traffic Management Account, from where it can be allocated to highways or transport related purposes.

3 DETAIL

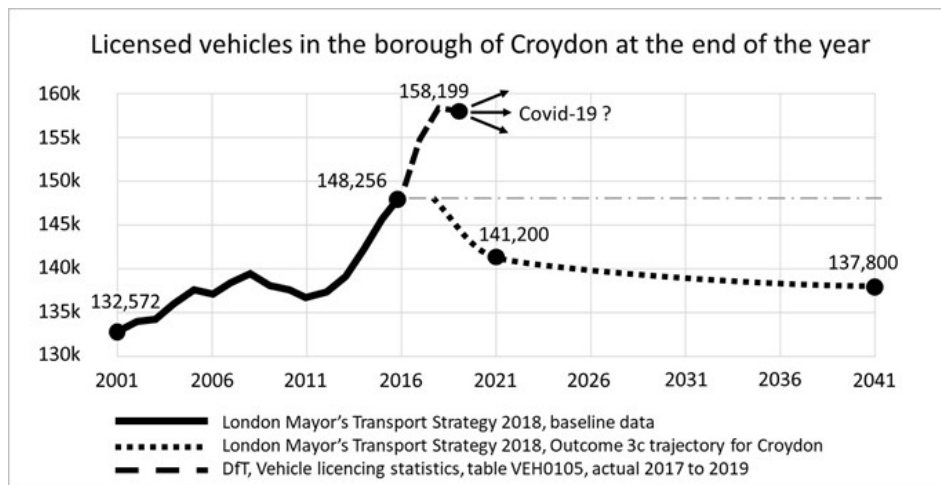
3.1 TRAFFIC MANAGEMENT OBJECTIVE

- 3.1.1 Parking charges are a traffic management device that contributes towards meeting the Council's road network duties under the Traffic Management Act 2004 and the Road Traffic Regulations Act 1984. The RTRA1984 makes provision for the Council managing parking facilities on and off the highway, having regards to the desirability of securing and maintaining reasonable access to amenities, the National Air Quality Strategy and other relevant traffic

management objectives. This includes the establishment of parking charges to help manage the demand and nature of use of the parking facilities.

- 3.1.2 The RTRA1984 is not a fiscal measure and does not authorise the Council to use its powers to charge for parking solely to raise revenue. Any surplus from parking charges is ring-fenced to the Traffic Management Account (TMA), from where it can be allocated to highway or transport related expenditures as defined under the Act.
- 3.1.3 The duty to reduce the causes of congestion and disruption on the road network extends to both moving traffic and to parking. Every car journey starts and ends with a parking space. Parking charges are therefore an important device in influencing car use and traffic.
- 3.1.4 Croydon's Parking Policy 2019-2022¹, sets out that parking charges are operated in accordance with the RTRA1984.
- 3.1.5 The London Mayor's Transport Strategy 2018 (MTS), which prioritises public health and aims to reduce car use throughout London, is transposed into the Third Local Implementation Plan (LIP3). The MTS Outcome 3c for "London's streets will be clean and green" targets that traffic will fall and congestion kept in check, allowing more efficient operations. The MTS has defined a trajectory for the number of vehicles registered in Croydon to reduce to 141,200 by end of 2021 and to 137,800 by 2041.
- 3.1.6 The majority of parking charges in the Borough apply in on-street parking bays, which are mostly shared between parking permit holders and pay and display (P&D) bay users. This sharing maximises flexibility for drivers ensuring that there are access opportunities for visitors and customers to local businesses, whilst giving a degree of priority to resident permit holders and groups with protected characteristics. In accordance with the statutory requirements, the structure and level of parking charges must be designed to help balance this supply and demand. Roads and car parks where parking demand is high therefore tend to have higher P&D charges and shorter parking duration than lower demand areas.
- 3.1.7 As the borough continues to grow in population and density, the aim for periodically reviewing parking charges is to contribute to maintaining the access to homes, businesses and other amenities and to reduce the adverse environmental and public health impacts associated with non-essential car use. This is achieved by maintaining parking charges at a level that will encourage a lesser reliance on cars and support the effective management of the demand on the kerbside.
- 3.1.8 The number of vehicles registered in Croydon grew from 132,572 in 2001 to 148,256 in 2016 (the MTS/LIP3 baseline) and to 159,199 at the end of 2019 (DfT data). The ongoing rate of growth appears to have stalled, with 162 fewer vehicles registered in 2019 compared to 2018. The post-Covid situation is largely unpredictable. On one hand, the early signs indicate an increase in car use, as travellers avoid public transport. On the other hand, future trends in

home working and the potential for a post-Covid economic effect (as shown for the 2008 downturn) would likely contribute to a reduction in car use. Notwithstanding this uncertainty, the gap to the prescribed MTS/LIP3 trajectory is currently substantial.



- 3.1.9 Parking pressure is a growing problem. This became particularly evident during the recent Covid-19 lockdown, when more drivers stayed at home and many Controlled Parking Zone (CPZ) roads became overwhelmed. It became necessary to suspend parking enforcement, except for the most obstructive and dangerous parking. The situation presented a disservice to many residents who found it difficult to access their homes. Many residents had to park their cars several roads away from their homes and outside the CPZs, where they inadvertently impeded residents in these other areas.
- 3.1.10 When demand for parking in a location exceeds the available kerbside space, then parking space becomes a premium and drivers become more desensitised to the parking charges. The parking charges in effect lose their effectiveness in managing the excess demand. Maintaining parking charges at too low a level will insufficiently influence travel mode choices, such as the use of car clubs and cycling, and it will not help encouraging those who are able to give up a non-essential car.
- 3.1.11 Parking places across the Borough are generally oversubscribed, which indicates that current charges have not reached the price elasticity point. When one driver deselect using the car unnecessarily (which is a traffic management objective), then another is ready to take the space. In such a situation, parking charges should be increased until the sensitivity point is reached and a sufficient degree of car travel and parking is discouraged. Essential car owners, who needs to driver, will find easy accessible parking more valuable than cheap parking.
- 3.1.12 The Cabinet on 25 March 2019² agreed a phased approach to introducing emission-based parking charges. This includes the implementation of emission-based banding of parking charges in P&D destination parking places from 1 January 2021. Considering the costs and disruption from revising tariff information on 800+ signs and P&D machines, it is preferable to combine the

implementation of the emissions scheme and the charges increase into a single works project.

3.1.13 Parking controls will contribute to the control of congestion and emissions. The reciprocal – that emission-controls contribute to parking controls – does not automatically hold true. While transport policy in general is concerned with unreliability of journey times caused by unanticipated congestion, journey times can also become uncertain because of the failure to find vacant destination parking space, with further consequences to local congestion arising from the searching and idling for parking spaces. All cars in fact take up parking space, cause congestion and show hostility towards cyclists and pedestrians, regardless of emission levels and fuel type. Emission-based parking charges are important to reduce harmful emissions, but they are not the full solution to reducing congestion and making the road space more attractive to cycling. The general parking times and charges structure are more effective in achieving this.

3.1.14 The average car is parked at home for about 80% of the time, parked elsewhere for about 16.5% of the time, and is used for the remaining 3.5% [source: RAC Foundation, Spaced Out: Perspectives on parking policy, July 2012]. Parking management measures typically operate by designating or moderating the provided space and through the parking time and charges structure. Motorists can respond to the measures by:

- Parking in a place that best suit personal needs;
- Parking in a different location with more space or lower charges, maybe with further to walk;
- Parking for a different length of time;
- Making use of parking discounts, such as off-peak or emission-based pricing;
- Changing the mode of travel;
- Changing the destination; or
- Abandoning the journey.

3.1.15 A comprehensive review of on-street and off-street parking charges was carried out in 2016 with a simpler linear tariff being introduced with set rates per 30 minutes for P&D bay charges. This was carried out as part of a fair parking policy to provide a more consistent approach across the Borough, in an operationally cost-effective way, while complying with the road network duties placed upon the Council. The then introduced charges were subsequently reviewed in 2018, which was the most recent review prior to this report.

3.1.16 Croydon's good transport links, to both London, Gatwick and the Tram route across the borough, makes Croydon susceptible to external commuter parking – i.e. from drivers arriving from outside the borough and who use Croydon primarily for all-day car parking while they travel on. This can in places impede access for local residents and local business customers. Comparing parking charges in Croydon with those in the immediate neighbouring boroughs, there

currently is an abnormality in Croydon offering the lowest priced all day parking. This situation has developed in combination with increased parking pressure from more cars being on the road.

Town	Croydon	Bromley	Sutton	Merton	Caterham
1 hour in district centre	Free	70p	£1.20	£1.50	Free
2 hours in central zone	£5.20	£3.80	£4.50	£6.00	Free
8 hours in residential zone	£4.80/£8.00	£8.80	£9.00	£12.00	Free
8 hours in district car park	£4.80	£5.60	£4.50	£5.00/£7.00	Free
8 hours in central car park	£13.60	£14.00	£5.00	£16.00	Free

* Obtained July 2020.

3.1.17 The 2 hours on-street charge in the Croydon central zone is higher than the in privately operated multi-storey car parks. The privately operated cars parks all operate with spare capacity, meaning that drivers have choices. It is a traffic management objective to encourage off-street parking where possible. The following example tariffs were obtained in July 2020. The 2-hour charges in the privately operated Centrale Centre car park is £3.70, Qpark (off Surrey Street) is £4.00 and NCP in Wandle Road (by Flyover) is £3.50. Centrale has a standing offer of £5.70 for all day parking. QPark has a season ticket that is £5.00 equivalent per day option. NCP at the Whitgift Centre is £6.20 for 2 hours, although it has an early bird (pre-9am) £4.50 all day and season ticket that is £4.35 equivalent per day options.

3.1.18 Across the district centre high streets, the emission-based parking charges scheme agreed by Cabinet on 25 March 2019², has opened a consultation on converting 460 time limited 1-hour free parking bays, to 2-hour maximum emission-based charged parking³. This supports the emissions-reduction objectives and has a further traffic management purpose in helping to improve customer access/footfall and the attractiveness of public realm near shops and other business outlets in the district centres. The locations are as follows:

- District Centre high streets in South Norwood, Thornton Heath, Selsdon, Purley and Coulsdon Town.
- Local centres in Beulah Hill, Cherry Orchard Road, Lower Addiscombe Road, Addiscombe, Brighton Road (South Croydon), Station Approach Sanderstead, and Old Lodge Lane (Purley).
- London Road between Sumner Road and Broad Green Avenue.

It is recommended not to apply any charges increase, should the outcome of the above described consultation result in a newly converted tariff structure.

3.1.19 In summary to this section 3.1, there is a Traffic Management purpose in the following objectives:

- a) Revise P&D bay charges, to a level where they reach the price elasticity point and become relevant to the traffic management purpose – i.e. to contribute to meeting the trajectory for cars reduction prescribed by the MTS/LIP3 Outcome 3c.
- b) The revised charges must proportionately align to the evolved parking pressures and represent an increase that exceeds that recently introduced for emission-based parking permit charges, to secure that resident permit holders are not deprioritised in access to the parking capacity in residential roads.
- c) The parking reduction impact must incur mostly in the longer stay bays. These bays tend to be in residential roads, where local residents compete for space with commuters and day visitors. The residents will have access to discounted parking permits and visitor permits, and need therefore not be impacted by P&D charges.
- d) In the Croydon central zone, there is a purpose in encouraging drivers to use the under-utilised off-street parking capacity in the privately operated car parks, to help free up the streets from parked cars and make more space for pedestrians and cyclists.
- e) Disabled Blue Badge holders must continue to park for free and can also park where certain restrictions otherwise applies.
- f) Implement the revised P&D charges increase in combination – i.e. simultaneously – with the emission-based charges structure that was agreed by Cabinet in March 2019, to minimise cost and disruption from making the tariff changes.

3.2 PRIOR ENGAGEMENT

3.2.1 The draft Parking Policy 2019-2022 was consulted on in May 2019, prior to its final approval in July 2019.

3.2.2 A survey on the future of transport for the then 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 PROPOSED CHARGES

3.3.1 A 30p per 30min increase in parking charges is required to discourage a level of car travel and parking – to appropriately address the MTS/LIP3 car use reduction objective. Subject to the emission-based tariff structure being agreed, a 30p per 30min increase would apply to the default emissions Band 3. Drivers

of emission Band 2 vehicles, which represents the majority 65% of cars registered in the Borough, will incur a 25% discount and effectively experience a 23p increase; while drivers of electric vehicles will experience a 3p increase.

- 3.3.2 The parking reduction impact will mostly incur in the longer stay bays, where the charges increase is multiplied by a higher number of 30min units and therefore appears more noticeable. These longer stay bays tend to be in residential roads, where local residents compete for space with commuters and day visitors.
- 3.3.3 Residents have access to discounted parking permits and visitor permits and do therefore not need to be affected by the 30p P&D increase. The 30p increase can thereby better serve the traffic management purpose of providing a degree of priority to residents.
- 3.3.4 The 30p per 30min increase will have a lesser perceivably effect in short stay bays, which are often near to shops and amenities and which depend on a high turnover in parking events. It is I fact assumed that freeing up bays from longer-stay parking will offer opportunity for more short stay events.
- 3.3.5 The table below shows the estimated changes in parking events in the individual time bands, which would result from a 30p per 30min increase. The net result adds up to a net 12% reduction in parking events, which would mainly occur in the longer stays such as commuter parking. Considering that parking charges were last revised in September 2018 and that revisions have historically tended to happen every other year, the 12% parking reduction is in line with the Mayor’s Transport Strategy, as adopted into Croydon’s LIP3.

Time band	Existing avg. charge*	New avg. charge	% of events	Est. events change	Net income effect
30min	£0.50	£0.80	24%	+4%	+32% =£2.64m p.a.
1hr	£1.20	£1.80	19%	+2%	
2hr	£2.05	£3.25	10%	-3%	
4hr	£4.70	£7.10	8%	-20%	
8hr+	£9.40	£14.20	39%	-30%	

* Note, the average charge combines charges across different time limited bays. For example, 1 hour parking is £2.60 in a max 2-hr zone, while it is £0.60 in a max 8-hr zone. The average depends on the distribution in bay usage between the different zone types.

- 3.3.6 The resulting detailed tariffs for each the individual parking places are listed in Appendix 1 and 2. Note that 2 two possible outcomes are presented. The resulting outcome from this decision depends on the outcome from a separate public consultation and decision on introducing emission-based parking charges.

New outcome ‘A’ is the new charges that would result from this report decision if the emission-based charges do not proceed.

New outcome 'B' is the new charges that would result from this report decision if the emission-based charges do proceed.

The Public Notice described below will be published once the emissions-based scheme has been decided upon, in accordance with the decision authority authorised by Cabinet on 25 March 2019. This report hence recommends the 30p/30min increase in parking charges, regardless which of the two outcome options becomes relevant. The resulting Public Notice will list the appropriate outcome columns only – i.e. the irrelevant column will be deleted prior to publication.

- 3.3.7 The reason for presenting the decision in this 'parallel' fashions, as opposed to treating the schemes sequentially in isolation, is to enable the 2 schemes be implemented simultaneously. The combined implementation reduces costs, resources demand and disruptions/confusion to drivers that would otherwise occur if implementing the schemes in 2 sequential steps.
- 3.3.8 For clarity to Appendix 2, Droves Road and Duppas Hill Terrace a 2 small rows of bays immediately adjoining the highway, but which actually stands on off-street land. They are covered by an off-street TMO, but are otherwise fully aligned to the 4-hour on-street CPZ and accepts the 'West' zone on-street resident permit.

3.4 **PUBLIC NOTICE**

- 3.4.1 In accordance with section 35C and 46A of the Road Traffic Regulation Act 1984, subject to the recommendations being agreed, the revised parking charges will require publication in a local paper (Croydon Guardian) and London Gazette for a minimum of 21 days in advance of their implementation. The statutory procedure for the notice of variation in parking charges does not include any requirement for inviting or considering objections.

3.5 **IMPLEMENTATION**

- 3.5.1 Subject to the recommendations in this report being agreed and the further decision process, a Traffic Management Order amending the charges can come into effect on 1 January 2021. From this date, the update to P&D machine notices, including displaying the new process for obtaining the lower emissions discounts, and physical replacement of mobile pay signs and car park tariff boards will be undertaken. The preparation and works will demand the temporary allocation of a dedicated project resource, proposed to be filled by an internal secondment.
- 3.5.2 It would be unacceptable to start replacing certain tariff signs in advance of the Traffic Management Order legally coming into effect, even if drivers were still to incur the earlier revision of parking charges. It is therefore logistically unavoidable that for a few days over the implementation period, some drivers

will experience paying less than the newly displayed tariff. This is preferred to the opposite scenario, where drivers are charged more than the displayed tariff.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21	2021/22	2022/23	2023/24
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	0	0	0	0
Income	(800)	(1,630)	(1,630)	(1,630)
Effect of decision from report				
Expenditure	0	0	0	0
Income	(748)	(2,640)	(2,640)	(2,640)
Remaining budget	<u>52</u>	<u>(1,010)</u>	<u>(1,010)</u>	<u>(1,010)</u>
Capital Budget available				
Expenditure	0	0	0	0
Effect of decision from report				
Expenditure	150	0	0	0
Remaining budget	<u>150</u>	<u>0</u>	<u>0</u>	<u>0</u>

2 The effect of the decision

The in-year income is £748k, but this could potentially augment by £275k, to become £1,023, subject to the yet unknown outcome of the consultation on emission-based charges structure.

The introduction of emission-based destination parking charges in 2021, as per the 25 March 2019 Cabinet report (background paper 1) and subject to consultation, would produce a full-year (£830k) effect in 2021/22. This pre-programmed effect is assumed for information purpose and included in the 'Revenue Budget available' line for future years – although this future budget remains to be approved.

3 Risks

No particular financial risks are identified.

4 Options

Not introducing the recommended charges would result in a £800k pressure on the 2020/21 parking income budget, in addition to the pressure already impacted by Covid-19.

5 Future savings/efficiencies

The scheme is not expected to create any savings or efficiencies.

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

5 LEGAL CONSIDERATIONS

- 5.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 35C, 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 and off-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 recommendations in this report do not have any human resources implications. The implementation project calls for a temporary 6-week internal secondment, which will be met from existing budgets and can present a personal development opportunity for a member of staff. Any additional HR issues which arise other than in the planned budget and establishment 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 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:
- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c) Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The Equalities Impact Assessment (EqIA) is attached in the background documents. It incorporates the results from engagement on the Parking Policy 2019-2022 in April 2019, which includes sections of parking charges. The

outcome of the September 2020 consultation on the combination emission-based parking charges is also considered.

- 7.3 The prior engagement and consultation results in 2019 and 2020 have found that no individual protected sub-group stands out as having responded negatively to the principles behind parking charges and emission-based banding – in terms of impact on their protected characteristics. There has been some elevated concern about insufficiency in the parking bays accessible for the disabled and that disabled drivers, with an essential car use need, may have to start paying for parking. These concerns are recognised and mitigated in the Parking Policy actions plan and are supported by the currently proposed revision of parking charges. It is not recommended to introduce parking charges for disabled Blue Badge holders.
- 7.4 Influencing the overall number of cars parked on the roads in the borough, and in parking congested P&D zones in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate where participation is currently disproportionately low.
- 7.5 Active encouragement of car use and emission reduction, benefits all individuals, families and neighbourhoods. Air pollution 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.
- 7.6 There is currently no evident information to suggest that increasing and banding parking charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act).
- 7.7 The recommendations in this report do not conflict with the Public Sector Equality Duty. In terms of groups with protected characteristics, it is considered that the reasons for introducing a 30p per 30min increase in parking charges, combined with emissions-based banding, outweighs any reasons for not implementing them.

Approved by: Yvonne Okiyo, Equalities Officer

8 ENVIRONMENTAL IMPACT

- 8.1 The parking charges contribute to the objectives for the Air Quality Actions Plan.

9 CRIME AND DISORDER REDUCTION IMPACT

- 9.1 There are no foreseeable impacts on crime and disorder.

10 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 10.1 P&D bay parking charges are currently too low for effectively influencing car use. As consequence, the Council sub-optimally meets its traffic management duties.

11 OPTIONS CONSIDERED AND REJECTED

- 11.1 The alternative option to do nothing would be a lost opportunity for improving access to homes, businesses and amenities and to making a contribution to the Air Quality Actions Plan. This would fall short of obligations under nationally and regionally devolved responsibilities for improving the Borough's air quality and public health, including the Mayor's Transport Strategy objective to reduce car dependency.

CONTACT OFFICER:

- Steve Iles, Director of Public Realm;
- Sarah Randall, Heading of Parking Services.

APPENDICES TO THIS REPORT

- Appendix 1 – Proposed on-street parking charges.
- Appendix 2 – Proposed off-street (car parks) parking charges.

BACKGROUND PAPERS

1. <https://www.croydon.gov.uk/transportandstreets/policies/parking-policy-2019-to-2022>
2. <https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=1553&Ver=4> (item 28/19)
3. <https://getinvolved.croydon.gov.uk/uploadedfiles/ED%20Place%20report%20on%20consultation%20Sep%202020.pdf>
4. Equalities Impact Assessment on Emission-based and Increased Parking Charges, dated 9 September 2020.

On-Street Parking Charges – Proposed Changes

The Public Notice of new parking charges would show the charges set under the 'existing' TMO and one of the 'new' charges to be introduced into an amended TMO.

Which of the two outcomes depends on the outcome of the consultation on emission-based parking charges.

New outcome 'A' is the new charges that would result if the emission-based charges do not proceed.

New outcome 'B' is the new charges that would result if the emission-based charges do proceed. In this case the emissions bands are described as follows:

Band 1 applied to electric or other vehicles emitting less than 1g/km CO₂. The new parking charge equates to **90% discount** on the Band 3 charge.

Band 2 applies to vehicles emitting between 1 and 185g/km CO₂. The new parking charge equates to **25% discount** on the Band 3 charge.

Band 3 applies the vehicles emitting more than 185g/km CO₂; vehicles registered before March 2001; diesel engine vehicles registered before September 2015; and all payments made at P&D machines.

Inner Zone CPZs

Croydon CPZs, 2-hour zone (light)			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existing		Band 1	Band 2	Band 3
Mon – Sat 9am - 5pm	30min	£0.00	£0.00	£0.20	£1.50	£2.00
	1hr	£2.60	£3.20	£0.40	£3.00	£4.00
	1hr 30min	£3.90	£4.80	£0.60	£4.50	£6.00
	2hrs	£5.20	£6.40	£0.80	£6.00	£8.00
Sunday	All day	£0.00	£0.00	£0.00	£0.00	

London Road, West Croydon Station to Sumner Rd

South End and Selsdon Road, South Croydon

Croydon CPZs, 2-hour zone		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£1.30
	1hr	£2.60
	1hr 30min	£3.90
	2hrs	£5.20
Sunday	1hr	£1.30
	All day	£3.30
6pm – Midnight	1hr	£1.30
Mon – Sun	All night	£3.30

New outcome 'A'
£1.60
£3.20
£4.80
£6.40
£1.90
£4.60
£1.90
£4.60

New outcome 'B'		
Band 1	Band 2	Band 3
£0.20	£1.50	£2.00
£0.40	£3.00	£4.00
£0.60	£4.50	£6.00
£0.80	£6.00	£8.00
£0.23	£1.73	£2.30
£0.58	£4.35	£5.80
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60

Croydon CPZs, 4-hour zone		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£0.90
	1hr	£1.80
	1hr 30min	£2.70
	2hrs	£3.60
	2hr 30min	£4.50
	3hrs	£5.40
	3hr 30min	£6.30
	4hrs	£7.20
Sunday	1hr	£1.30
	All day	£3.30
6pm - Midnight	1hr	£1.30
Mon – Sun	All night	£3.30

New outcome 'A'
£1.20
£2.40
£3.60
£4.80
£6.00
£7.20
£8.40
£9.60
£1.90
£4.60
£1.90
£4.60

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£1.20	£9.00	£12.00
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60

Croydon CPZs, 8-hour zone, standard		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£0.30
	1hr	£0.60
	1hr 30min	£0.90
	2hrs	£1.20
	2hr 30min	£1.50

New outcome 'A'
£0.60
£1.20
£1.80
£2.40
£3.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.07	£0.53	£0.70
£0.14	£1.05	£1.40
£0.21	£1.58	£2.10
£0.28	£2.10	£2.80
£0.35	£2.63	£3.50

	3hrs	£1.80	£3.60	£0.42	£3.15	£4.20
	3hr 30min	£2.10	£4.20	£0.49	£3.68	£4.90
	4hrs	£2.40	£4.80	£0.56	£4.20	£5.60
	4hr 30min	£2.70	£5.40	£0.63	£4.73	£6.30
	5hrs	£3.00	£6.00	£0.70	£5.25	£7.00
	5hr 30min	£3.30	£6.60	£0.77	£5.78	£7.70
	6hrs	£3.60	£7.20	£0.84	£6.30	£8.40
	6hr 30min	£3.90	£7.80	£0.91	£6.83	£9.10
	7hrs	£4.20	£8.40	£0.98	£7.35	£9.80
	7hr 30min	£4.50	£9.00	£1.05	£7.88	£10.50
	8hrs	£4.80	£9.60	£1.12	£8.40	£11.20
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00

Croydon CPZs, 8-hour zone, premium			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existing		Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.50	£0.80	£0.10	£0.75	£1.00
	1hr	£1.00	£1.60	£0.20	£1.50	£2.00
	1hr 30min	£1.50	£2.40	£0.30	£2.25	£3.00
	2hrs	£2.00	£3.20	£0.40	£3.00	£4.00
	2hr 30min	£2.50	£4.00	£0.50	£3.75	£5.00
	3hrs	£3.00	£4.80	£0.60	£4.50	£6.00
	3hr 30min	£3.50	£5.60	£0.70	£5.25	£7.00
	4hrs	£4.00	£6.40	£0.80	£6.00	£8.00
	4hr 30min	£4.50	£7.20	£0.90	£6.75	£9.00
	5hrs	£5.00	£8.00	£1.00	£7.50	£10.00
	5hr 30min	£5.50	£8.80	£1.10	£8.25	£11.00
	6hrs	£6.00	£9.60	£1.20	£9.00	£12.00
	6hr 30min	£6.50	£10.40	£1.30	£9.75	£13.00
	7hrs	£7.00	£11.20	£1.40	£10.50	£14.00
	7hr 30min	£7.50	£12.00	£1.50	£11.25	£15.00
	8hrs	£8.00	£12.80	£1.60	£12.00	£16.00
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00

Croydon CPZs, 12-hour zone			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existing		Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.50	£0.80	£0.10	£0.75	£1.00
	1hr	£1.00	£1.60	£0.20	£1.50	£2.00
	1hr 30min	£1.50	£2.40	£0.30	£2.25	£3.00
	2hrs	£2.00	£3.20	£0.40	£3.00	£4.00
	2hr 30min	£2.50	£4.00	£0.50	£3.75	£5.00
	3hrs	£3.00	£4.80	£0.60	£4.50	£6.00
	3hr 30min	£3.50	£5.60	£0.70	£5.25	£7.00
	4hrs	£4.00	£6.40	£0.80	£6.00	£8.00
	4hr 30min	£4.50	£7.20	£0.90	£6.75	£9.00
	5hrs	£5.00	£8.00	£1.00	£7.50	£10.00
	5hr 30min	£5.50	£8.80	£1.10	£8.25	£11.00
	6hrs	£6.00	£9.60	£1.20	£9.00	£12.00
	6hr 30min	£6.50	£10.40	£1.30	£9.75	£13.00
	7hrs	£7.00	£11.20	£1.40	£10.50	£14.00
	7hr 30min	£7.50	£12.00	£1.50	£11.25	£15.00
	8hrs	£8.00	£12.80	£1.60	£12.00	£16.00
	8hr 30min	£8.50	£13.60	£1.70	£12.75	£17.00
	9hrs	£9.00	£14.40	£1.80	£13.50	£18.00
	9hr 30min	£9.50	£15.20	£1.90	£14.25	£19.00
	10hrs	£10.00	£16.00	£2.00	£15.00	£20.00
	10hr 30min	£10.50	£16.80	£2.10	£15.75	£21.00
	11hrs	£11.00	£17.60	£2.20	£16.50	£22.00
	11hr 30min	£11.50	£18.40	£2.30	£17.25	£23.00
	12hrs	£12.00	£19.20	£2.40	£18.00	£24.00
Sunday	1hr	£1.30	£1.90	£0.22	£1.65	£2.20
	All day	£3.30	£4.60	£0.56	£4.20	£5.60

Outer Zone CPZs

District CPZs, 2-hour zone		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£0.70
	1hr	£1.40
	1hr 30min	£2.10
	2hrs	£2.80
Sunday	All day	£0.00

New outcome 'A'
£1.00
£2.00
£3.00
£4.00
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.12	£0.90	£1.20
£0.24	£1.80	£2.40
£0.36	£2.70	£3.60
£0.48	£3.60	£4.80
£0.00	£0.00	£0.00

District CPZs, 4-hour zone		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£0.50
	1hr	£1.00
	1hr 30min	£1.50
	2hrs	£2.00
	2hr 30min	£2.50
	3hrs	£3.00
	3hr 30min	£3.50
	4hrs	£4.00
Sunday	All day	£0.00

New outcome 'A'
£0.80
£1.60
£2.40
£3.20
£4.00
£4.80
£5.60
£6.40
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.10	£0.75	£1.00
£0.20	£1.50	£2.00
£0.30	£2.25	£3.00
£0.40	£3.00	£4.00
£0.50	£3.75	£5.00
£0.60	£4.50	£6.00
£0.70	£5.25	£7.00
£0.80	£6.00	£8.00
£0.00	£0.00	£0.00

District CPZs, 8-hour zone		
Tariff	Duration	Existing
Mon – Sat During CPZ hours	30min	£0.30
	1hr	£0.60
	1hr 30min	£0.90
	2hrs	£1.20
	2hr 30min	£1.50
	3hrs	£1.80
	3hr 30min	£2.10
	4hrs	£2.40

New outcome 'A'
£0.60
£1.20
£1.80
£2.40
£3.00
£3.60
£4.20
£4.80

New outcome 'B'		
Band 1	Band 2	Band 3
£0.07	£0.53	£0.70
£0.14	£1.05	£1.40
£0.21	£1.58	£2.10
£0.28	£2.10	£2.80
£0.35	£2.63	£3.50
£0.42	£3.15	£4.20
£0.49	£3.68	£4.90
£0.56	£4.20	£5.60

	4hr 30min	£2.70	£5.40	£0.63	£4.73	£6.30
	5hrs	£3.00	£6.00	£0.70	£5.25	£7.00
	5hr 30min	£3.30	£6.60	£0.77	£5.78	£7.70
	6hrs	£3.60	£7.20	£0.84	£6.30	£8.40
	6hr 30min	£3.90	£7.80	£0.91	£6.83	£9.10
	7hrs	£4.20	£8.40	£0.98	£7.35	£9.80
	7hr 30min	£4.50	£9.00	£1.05	£7.88	£10.50
	8hrs	£4.80	£9.60	£1.12	£8.40	£11.20
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00

Off-Street Parking Charges – Proposed Changes

The Public Notice of new parking charges would show the charges set under the 'existing' TMO and one of the 'new' charges to be introduced into an amended TMO.

Which of the two outcomes depends on the outcome of the consultation on emission-based parking charges.

New outcome 'A' is the new charges that would result if the emission-based charges do not proceed.

New outcome 'B' is the new charges that would result if the emission-based charges do proceed. In this case the emissions bands are described as follows:

Band 1 applied to electric or other vehicles emitting less than 1g/km CO₂. The new parking charge equates to **90% discount** on the Band 3 charge.

Band 2 applies to vehicles emitting between 1 and 185g/km CO₂. The new parking charge equates to **25% discount** on the Band 3 charge.

Band 3 applies the vehicles emitting more than 185g/km CO₂; vehicles registered before March 2001; diesel engine vehicles registered before September 2015; and all payments made at P&D machines.

Central Croydon

East Croydon Station, 8 spaces			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existing		Band 1	Band 2	Band 3
Mon – Sat 7am - 6pm	15min	£0.50	£0.70	£0.09	£0.68	£0.90
	30min	£1.00	£1.30	£0.18	£1.35	£1.80

Factory Lane, 18 spaces			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existing		Band 1	Band 2	Band 3
Mon – Sat	1hr	£1.30	£1.90	£0.23	£1.73	£2.30
	2hrs	£2.60	£3.80	£0.46	£3.45	£4.60
	3hrs	£3.90	£5.70	£0.69	£5.18	£6.90
	4hrs	£5.20	£7.60	£0.92	£6.90	£9.20
	5hrs	£6.50	£9.50	£1.15	£8.63	£11.50
	6hrs	£7.80	£11.40	£1.38	£10.35	£13.80
	7hrs	£9.30	£13.50	£1.61	£12.08	£16.10
	24hrs	£10.60	£15.40	£1.84	£13.80	£18.40
Evening 6pm - 7am	1hr	£1.30	£1.90	£0.22	£1.65	£2.20
	All night	£3.30	£4.60	£0.56	£4.20	£5.60
Permit*	12 months	£400.00	£580.00	£72.00	£540.00	£720.00
Motorcycles	All day	£0.00	£0.00	£0.00	£0.00	£0.00

* renewals only, no longer available (legacy arrangement)

Jubilee Bridge, 80 spaces		
Tariff	Duration	Existing
Mon – Sat	1hr	£1.30
	2hrs	£2.60
	3hrs	£3.90
	4hrs	£5.20
	5hrs	£6.50
	6hrs	£7.80
	7hrs	£9.30
	24hrs	£10.60
Evening 6pm - 7am	1hr	£1.30
	All night	£3.30
Season Ticket	12 months	£700.0 0
Motorcycle s	All day	£0.00

New outcome 'A'
£1.90
£3.80
£5.70
£7.60
£9.50
£11.40
£13.50
£15.40
£1.90
£4.60
£1,015.0 0
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.23	£1.73	£2.30
£0.46	£3.45	£4.60
£0.69	£5.18	£6.90
£0.92	£6.90	£9.20
£1.15	£8.63	£11.50
£1.38	£10.35	£13.80
£1.61	£12.08	£16.10
£1.84	£13.80	£18.40
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60
£126.00	£945.00	£1,260.0 0
£0.00	£0.00	£0.00

Spices Yard, 134 spaces		
Tariff	Duration	Existing
Mon – Sat	1hr	£1.30
	2hrs	£2.60
	3hrs	£3.90
	4hrs	£5.20
	5hrs	£6.50
	6hrs	£7.80
	7hrs	£9.30
	24hrs	£10.60
Evening 6pm - 7am	1hr	£1.30
	All night	£3.30
Sunday	1hr	£1.30
	All day	£3.30
Season Ticket	12 months	£920.0 0
Motorcycle s	All day	£0.00

New outcome 'A'
£1.90
£3.80
£5.70
£7.60
£9.50
£11.40
£13.50
£15.40
£1.90
£4.60
£1.90
£4.60
£1,330.0 0
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.23	£1.73	£2.30
£0.46	£3.45	£4.60
£0.69	£5.18	£6.90
£0.92	£6.90	£9.20
£1.15	£8.63	£11.50
£1.38	£10.35	£13.80
£1.61	£12.08	£16.10
£1.84	£13.80	£18.40
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60
£0.22	£1.65	£2.20
£0.56	£4.20	£5.60
£166.00	£1,245.0 0	£1,660.0 0
£0.57	£4.28	£5.70

Wandle Road, 122 spaces		
Tariff	Duration	Existing
Mon – Sat	1hr	£1.30
	2hrs	£2.60
	3hrs	£3.90
	4hrs	£5.20
	5hrs	£6.50
	6hrs	£7.80

New outcome 'A'
£1.90
£3.80
£5.70
£7.60
£9.50
£11.40

New outcome 'B'		
Band 1	Band 2	Band 3
£0.23	£1.73	£2.30
£0.46	£3.45	£4.60
£0.69	£5.18	£6.90
£0.92	£6.90	£9.20
£1.15	£8.63	£11.50
£1.38	£10.35	£13.80

	7hrs	£9.30	£13.50	£1.61	£12.08	£16.10
	24hrs	£10.60	£15.40	£1.84	£13.80	£18.40
Evening 6pm - 7am	1hr	£1.30	£1.90	£0.22	£1.65	£2.20
	All night	£3.30	£4.60	£0.56	£4.20	£5.60
Sunday	1hr	£1.30	£1.90	£0.22	£1.65	£2.20
	All day	£3.30	£4.60	£0.56	£4.20	£5.60
Season Ticket	12 months	£920.0 0	£1,330.0 0	£166.00	£1,245.0 0	£1,660.0 0
Motorcycle s	All day	£0.00	£0.00	£0.57	£4.28	£5.70

West Croydon (Station), 57 spaces			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existin g		Band 1	Band 2	Band 3
Mon – Sat	1hr	£1.70	£2.30	£0.28	£2.10	£2.80
	2hrs	£3.40	£4.60	£0.56	£4.20	£5.60
	3hrs	£5.10	£6.90	£0.84	£6.30	£8.40
	4hrs	£6.80	£9.20	£1.12	£8.40	£11.20
	5hrs	£8.90	£11.90	£1.40	£10.50	£14.00
	6hrs	£10.20	£13.80	£1.68	£12.60	£16.80
	7hrs	£11.90	£16.10	£1.96	£14.70	£19.60
	24hrs	£13.60	£18.40	£2.24	£16.80	£22.40
Evening 6pm - 7am	1hr	£1.30	£1.90	£0.22	£1.65	£2.20
	All night	£3.30	£4.60	£0.56	£4.20	£5.60
Contract	12 months	£850.0 0	£1,150.0 0	£144.00	£1,080.0 0	£1,440.0 0
Motorcycle s	All day	£0.00	£0.00	£0.00	£0.00	£0.00

District Centres

Belgrave Road, 15 spaces			New outcome 'A'	New outcome 'B'		
Tariff	Duration	Existin g		Band 1	Band 2	Band 3
Mon – Sat 7am - 6pm	1hr	£0.70	£1.30	£0.15	£1.13	£1.50
	2hrs	£1.40	£2.60	£0.30	£2.25	£3.00
	3hrs	£2.10	£3.90	£0.45	£3.38	£4.50
	4hrs	£2.80	£5.20	£0.60	£4.50	£6.00
	5hrs	£3.50	£6.50	£0.75	£5.63	£7.50
	6hrs	£4.20	£7.80	£0.90	£6.75	£9.00
	11hrs	£4.90	£9.10	£1.05	£7.88	£10.50
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00
Motorcycle s	All day	£0.00	£0.00	£0.00	£0.00	£0.00

Central Parade, 108 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00
Season Ticket	12 month	£500.00
Trade Permit	12 month	£80.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00
£920.00
£145.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£110.00	£825.00	£1,100.00
£18.00	£135.00	£180.00

Clifford Road, 25 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00
Eve. Permit	12 month	£60.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00
£110.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£13.00	£97.50	£130.00

Coulsdon Centre (CALAT), 35 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
Sunday	All day	£0.00
Motorcycles	All day	£0.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£0.00
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00

Garnet Road, 32 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00
Season Ticket	12 month	£420.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00
£780.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£93.00	£697.50	£930.00

Granville Gardens, 135 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00
Season Ticket	12 month	£420.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00
£780.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£93.00	£697.50	£930.00

Lion Green Road, 102 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00

Purley MSCP, 424 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00
Season Ticket	1 month	£65.00
	3 months	£180.00
	12 months	£600.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00
£120.00
£335.00
£1,110.00
£0

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£14.50	£108.75	£145.00
£40.00	£300.00	£400.00
£133.00	£997.50	£1,330.00
£0		£0

Reedham Station , 54 spaces		
Tariff	Duration	Existing
Mon - Sun	24hrs	£2.40
Motorcycles	24hrs	£0.00

New outcome 'A'
£4.40
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.53	£3.98	£5.30
£0.00	£0.00	£0.00

Russell Hill Place, 60 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90
Sunday	All day	£0.00
Motorcycles	All day	£0.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£0.00
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£0.00	£0.00	£0.00
£0.00	£0.00	£0.00

Sanderstead Road, 38 spaces		
Tariff	Duration	Existing
Mon – Sat 7am - 6pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	11hrs	£4.90

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50

Sunday	All day	£0.00
Motorcycles	All day	£0.00
Res. Permit	12 months	£290.00

£0.00
£0.00
£540.00

£0.00	£0.00	£0.00
£0.00	£0.00	£0.00
£63.00	£472.50	£630.00

Waddon Leisure, 32 spaces		
Tariff	Duration	Existing
Mon – Sun 7am – 10pm	1hr	£0.70
	2hrs	£1.40
	3hrs	£2.10
	4hrs	£2.80
	5hrs	£3.50
	6hrs	£4.20
	7hrs	£4.90
	15hrs	£5.60
Motorcycles	All day	£0.00

New outcome 'A'
£1.30
£2.60
£3.90
£5.20
£6.50
£7.80
£9.10
£10.40
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£1.20	£9.00	£12.00
£0.00	£0.00	£0.00

Droves Road, Duppas Hill Terrace		
Tariff	Duration	Existing
Mon – Sun 7am - 10pm	30min	£0.90
	1hr	£1.80
	1hr 30min	£2.70
	2hrs	£3.60
	2hr 30min	£4.50
	3hrs	£5.40
	3hr 30min	£6.30
	4hrs	£7.20
Motorcycles	All day	£0.00

New outcome 'A'
£1.20
£2.40
£3.60
£4.80
£6.00
£7.20
£8.40
£9.60
£0.00

New outcome 'B'		
Band 1	Band 2	Band 3
£0.15	£1.13	£1.50
£0.30	£2.25	£3.00
£0.45	£3.38	£4.50
£0.60	£4.50	£6.00
£0.75	£5.63	£7.50
£0.90	£6.75	£9.00
£1.05	£7.88	£10.50
£1.20	£9.00	£12.00
£0.00	£0.00	£0.00

Equality Analysis Form

Delivering for Croydon

CROYDON
www.croydon.gov.uk

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	PLACE
Title of proposed change	Emission-based and Increased Parking Charges – January 2021
Name of Officer carrying out Equality Analysis	Sarah Randall

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal.

The proposal is to revise parking charges to help more effectively achieve the traffic management duty and manage parking provision across the borough road network in line with the Corporate Plan and the borough's growth objectives. This is part of Phase 3 for introducing emission-based parking charges, as defined in the Cabinet report on 25 March 2019 and agreed by Cabinet on this date, subject to consultation.

This EA is a living document, which will be revised as the project develops and further consultation is conducted as necessary to fully review the potential impact on groups that share protected characteristics. A further revision of the document will consider the result of the consultation supporting a decision to implement the revised parking charges.

Our Corporate Plan for Croydon 2018-2022 sets out a number of priorities that are aimed at improving the environment we live in, and aim to make it more sustainable, to encourage and support health live. The key priorities directly or indirectly linked to parking charges include:

- An excellent transport network that is safe, reliable and accessible to all – by recognising the important link between transport and a sustainable environment and working collaboratively and undertaking informed decisions that are innovative based on the needs of a neighbourhood, for example, to encourage fewer short car journeys and reduce traffic congestion.
- A cleaner and more sustainable environment – by addressing air quality with the work we do, such as to help improve air quality and reduce congestion.
- Happy, healthy and independent lives – by preventing issues from becoming a problem and having an environment that encourages and supports healthy living.

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.

There are many national & regional strategies that have been introduced to improve air pollution and reduce emissions over recent years and months to help improve the public's health.

On 08 July 2019, Cabinet resolved to recommend that Council (on 15 July 2019) declare a 'Climate Emergency' and note the need for urgent action at an international, national and local level.

The proposal is to revise parking charges for the borough, aimed at contributing to a reduction in vehicles use and emissions that will help address public health priorities, the impact of vehicle emissions and congestion on air quality, the need for a shift to more active and sustainable transport modes, and the growing demand for kerbside space.

In the context of all the above, it is clear that the parking charges can play an important role in helping to achieve Croydon's Corporate outcomes. As the borough grows in population and density the aim is 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.

1. Equality Act 2010

Section 149 of the Equality Act 2010 sets out the Council's public sector equality duty (PSED). It provides as follows:

1.1 A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1.3 The steps involved in meeting the needs of disabled persons include, steps to take account of disabled persons' needs.

1.4 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

1.5 Compliance with the duties in section 149 may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

1.6 The relevant protected characteristics are—

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

2 Prior engagement on Parking Policy 2019-2022

The analysis of the engagement response to the then draft Parking Policy in April 2019 showed that 142 out of the total 183 respondents completed one or more of the equalities questions. Of these 135 responded to age questions, 136 to disability, 134 to gender and 130 to ethnicity. Emission-based parking permit charges were specifically described within both the then draft Parking Policy, the associated Cabinet report and the Get Involved survey site for the engagement.

The then draft Parking Policy described 6 policy sections, of which Section 2 on Parking Management and Section 5 on Parking charges are particularly relevant to the present document. Responses to Section 2 of the policy reflected some elevated level of concern from the protected groups of Disability and Age. These relate to respondents saying there are not enough disabled bays; not enough is being done to curb illegal parking; and a concern that Electric Vehicle Charging Points (EVCPs) may infringe on pavement space. All of these concerns are recognised and will be addressed in the policy. Responses to Section 5 showed some elevated level of concern amongst the disabled group for parking charges. The feedback received to the then draft Parking Policy were addressed by action points on the actions plan section of the Equalities Analysis and incorporated into the final policy implemented from 7th August 2019.

3 Prior consultation on Emission-based parking permit charges

This prior consultation refers to the Phase 1 and 2 of the emission-based parking charges, which were implemented on 1 September 2019 and 1 April 2020 respectively. Phase 1 and 2 were concerned with parking permits. Phase 3 is now concerned with on-street Pay & Display (P&D) destination parking charges. The previous statutory consultation has directly transferable elements. The analysis of the

statutory consultation on the emission-based parking permit charges (which closed on 20th June 2019) found that 154 of 1,149 respondents (13%) were concerned that the emission-based charges could be unfair to those who cannot afford a newer car, which includes the poorest, elderly and vulnerable. Several respondents detailed example personal circumstances. The following considerations were made and reflected in the key decision report:

- 3.1 In relation to the PSED compliance and any potential concerns of a disproportional impact on vulnerable car owners/drivers and those least able to fund a newer car, the following protected characteristics are identified in the Equalities Analysis as most relevant in relation to the proposal:
- Disability.
 - Age.
 - Pregnancy and maternity.

Section 3.4 describes how each of the above groups may be impacted, and mitigations for such impacts are detailed over sections 3.5 – 3.8 below.

- 3.2 The 1,149 respondents to the consultation did not raise any concerns from other protected groups. Other protected characteristics, as per Equality Act 2010 section 149(7), are considered to be less impacted by emission-based parking charges, and these include gender reassignment, race, religion or belief, sex and sexual orientation.

- 3.3 It is considered that the Council's fulfilment of the PSED duty is promoted by measures detailed under the following categories:

1. Addressing poor air quality and disproportionate impact on the more vulnerable residents.
2. Accessibility to the process of paying for parking – i.e. usability of payment machines/mechanisms/methods etc.
3. Cost/charge for parking a car.
4. Unavailability of space to park a car, for people with (physical or mental) mobility impairment for whom the car is essential.

Addressing poor air quality and its disproportionate impact on the more vulnerable residents

- 3.4 Air pollution is of increasingly higher importance as a public health issue. Air pollution contributes 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 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. Figure 1 shows how the majority of highly polluted areas are situated within CPZs (zones that have P&D parking charges).

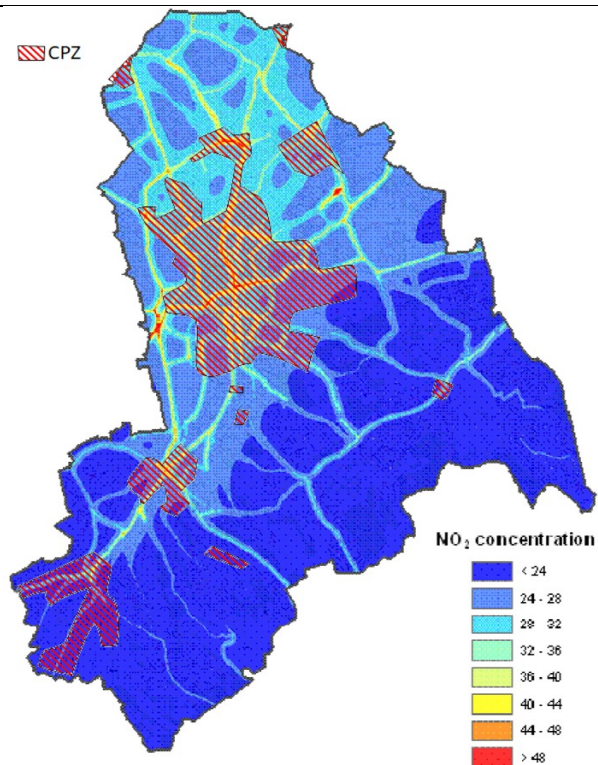


Figure 1 – CPZ P&D areas overlapped with predicted areas of Croydon breaching annual average nitrogen dioxide air quality objective (40µg/m³) in 2015.
 (source: *Air Quality Action Plan, 2017*)

There is a also disproportionally high overlap between the P&D parking bays areas and poor living environment, of which air quality is a significant factor (see Figure 2). The CPZ P&D bays coincide disproportionally with the areas of elevated risk of premature death and the impairment of quality of life due to poor health.

The Director for Public Health's Annual Report 2017 highlights that Croydon has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. The population density of children aged under 4 is disproportionally higher within the CPZ P&D areas, in particular in the North zones.

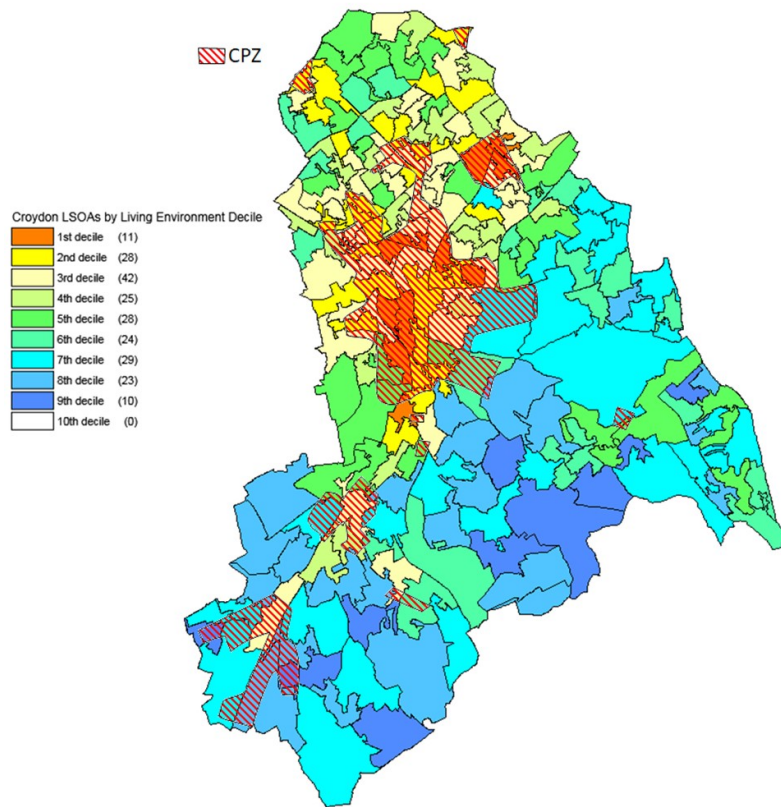


Figure 2 – CPZ P&D areas overlapped with the living environment domain, looking at both the indoor living environment and the outdoor living environment, including air quality.
(source: www.croydonobservatory.org)

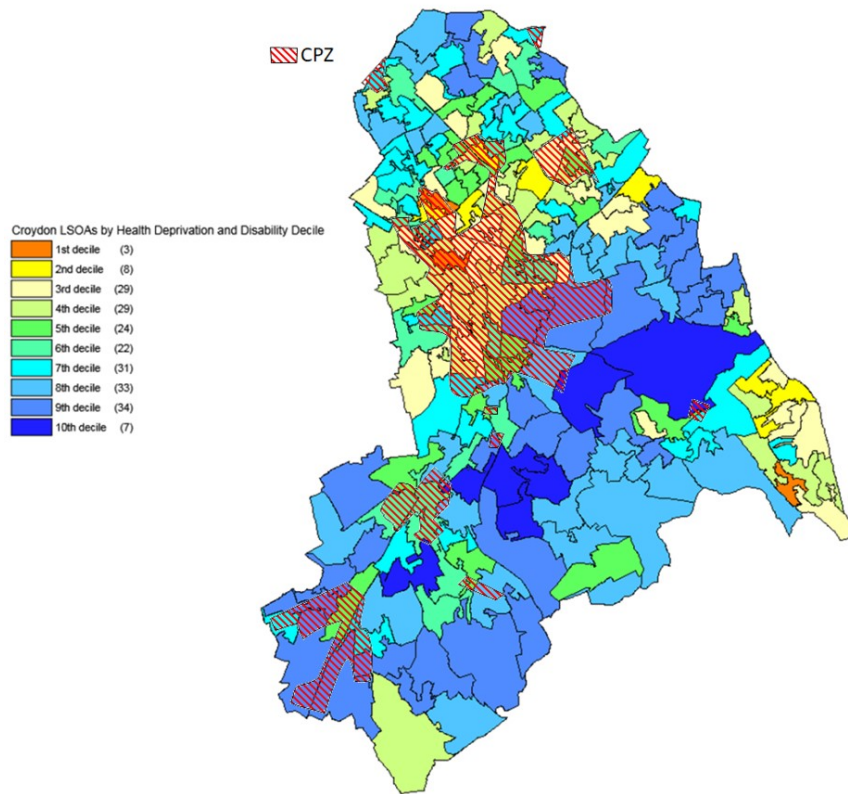
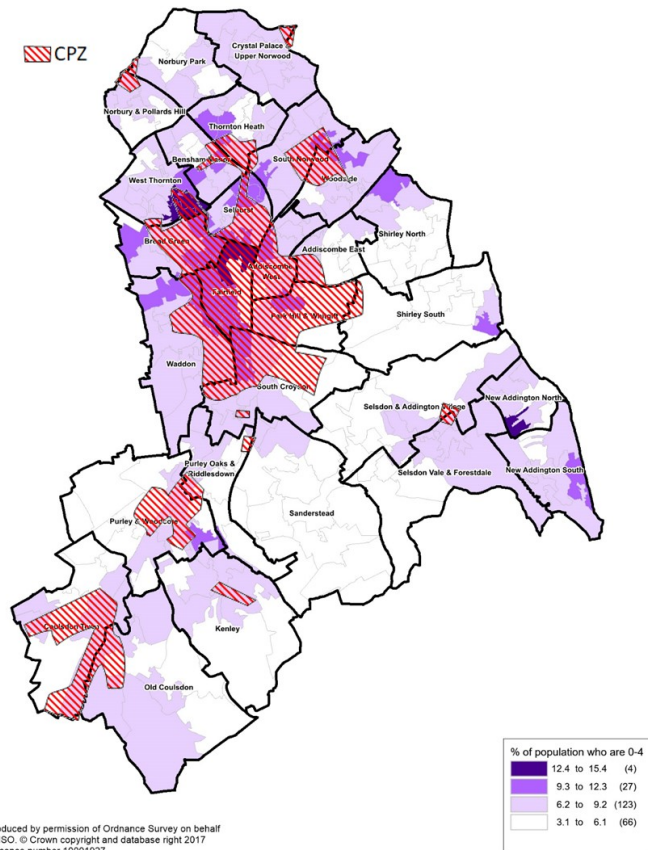


Figure 3 – CPZ P&D areas overlapped with health deprivation and disability, based on the risk of premature death and the impairment of quality of life due to poor mental or physical health.
 (source: www.croydonobservatory.org)

% of population who are 0-4
2016 Mid Year Estimates



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Figure 4 – CPZ P&D areas overlapped with density 0 - 4 year olds.
(source: www.croydonobservatory.org)

205 premature deaths each year in Croydon are attributed to air pollution and it mainly affects the vulnerable. By comparison, to put the public health issue into perspective, 493 deaths in 2008 were attributed to smoking. [source: Croydon Health And Wellbeing Board, Joint health and wellbeing strategy 2013-2018].

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. These actions are required to start showing results by 2021. 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 non-essential vehicles and this in turn would impact negatively on the overarching objectives. Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars.

Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals at risk of respiratory illnesses and exacerbation. It would enable persons from all protected groups to breathe cleaner and safer air. This can help improve the ability of certain protected groups to travel and participate where participation is currently disproportionately low as stated in the Equality Act 2010 as a Public sector equality duty.

Accessibility to the process of paying for parking

- 3.5 The proposal does not alter the present process for paying for parking, which is well evolved and is demonstrated to be accessible over at least a decade. The emission-charge calculation is automated upon entering the vehicle's registration number as is already required upon registering with the present Mobile Pay system. It should be noted that disabled Blue Badge holders, which counts 11,459 individual and 71 organisational blue badges holders in Croydon, are exempt from having to use process of paying for parking charges in public parking places.

Cost/charge for parking a car

- 3.6 CPZ P&D locations represent the roads with high demand for parking spaces and have been introduced to better manage the availability of kerb-space for residents and visitors. Parking charges are set as a means to help achieve this.
- 3.7 All 11,459 individual and 71 organisational blue badges holders in Croydon are exempt from the proposed parking charges. Free-of-charge disabled Companion Badges, for those who support a person with a Blue Badge, are also exempt from parking charges.
- 3.8 Some essential drivers, who do not necessarily have a disabled Blue Badge and are not automatically eligible for free parking, but do have a threshold mobility impairment, have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health conditions for people aged 16 to 64. The PIP, or DLA, motoring allowance is currently £61.20 per week (£68.35 for war pensioners), as help with extra costs that are faced as result of disabilities and is to cover the cost of a Motability lease agreement for an essential vehicle (or powered wheelchair/scooter).

With regards to persons with protected characteristics who are not eligible for a disabled blue badge or a motoring PIP, which includes the scenario of someone who must obtain and use a car as direct consequence of advanced age, pregnancy or maternity, the parking charges will remain a relatively modest element of the typical c.£2,000 to £4,000 total yearly cost of car ownership (www.motoringresearch.com/car-news/average-car-costs-a-month). Compared to all other associated costs of owning a car, parking charges would be a minimal percentage of the overall cost. It should be remembered that workplaces have a duty to secure access for

protected groups with mobility impairment. The proposed charges do not therefore significantly reduce the opportunities for persons who share protected characteristics and who are ineligible for a disabled blue badge.

- 3.9 The proposed revised charges are significantly reduced for lowest emission vehicles, meaning that for those who select a lowest emission car at their next choice, including those with protected characteristics who are ineligible for free parking, have opportunity to reduce their parking expenses.
- 3.10 With regards to maternity: Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.

The top 20% on higher income have higher car ownership and uses the car more than twice as much as the 20% on lowest income. [source: <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access>]. Car ownership and use impacts on air quality and public realm for those who walk. Although income is not protected characteristic, there is nonetheless a correlation between low income and health deprivation. Inappropriately low parking charges in effect disproportionately benefits the higher income section of the population, at the expense of the public health impacts from air pollution and a degraded living environments of those on lower income – who tends to be more deprived of health.

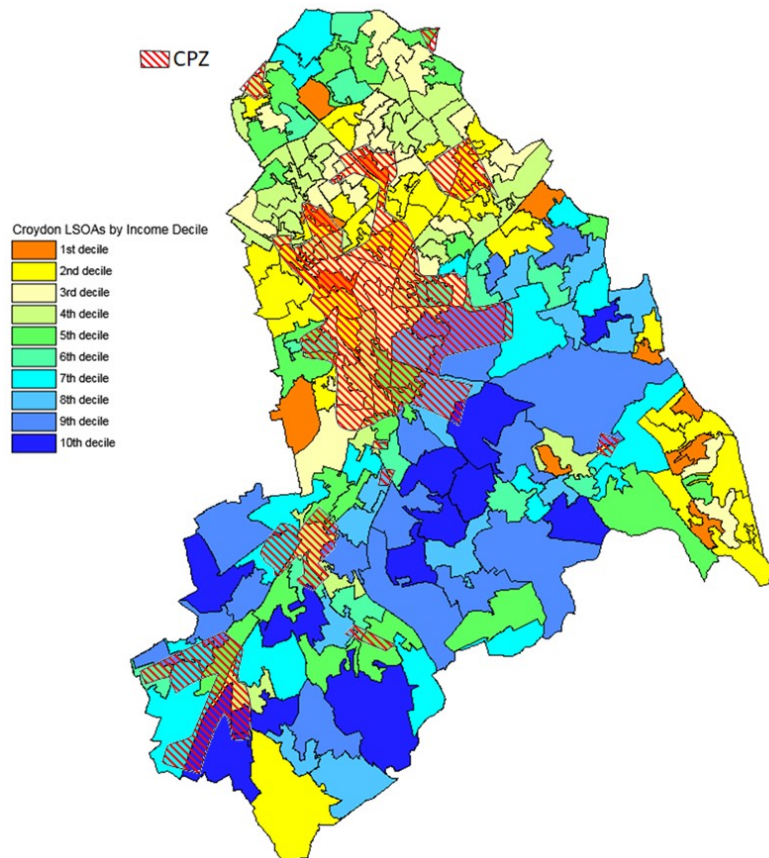


Figure 5 – CPZ P&D areas overlapped with income domain, looking at the proportion of the population who are either out of work or who have low earnings. The orange areas are in the top 10% most deprived areas in the country and together make up 5% of the total areas in the borough. Majority of orange areas are outside the CPZ, with the noticeable exceptions of the North Zone CPZ in Broad Green and Thornton Heath.

(source: www.croydonobservatory.org)

Figure 5 shows that although some CPZ areas overlap with low income domains, this is not the case for all CPZ areas. An estimation based on Figure 5 is that about a third of low income domains are within CPZ P&D areas.

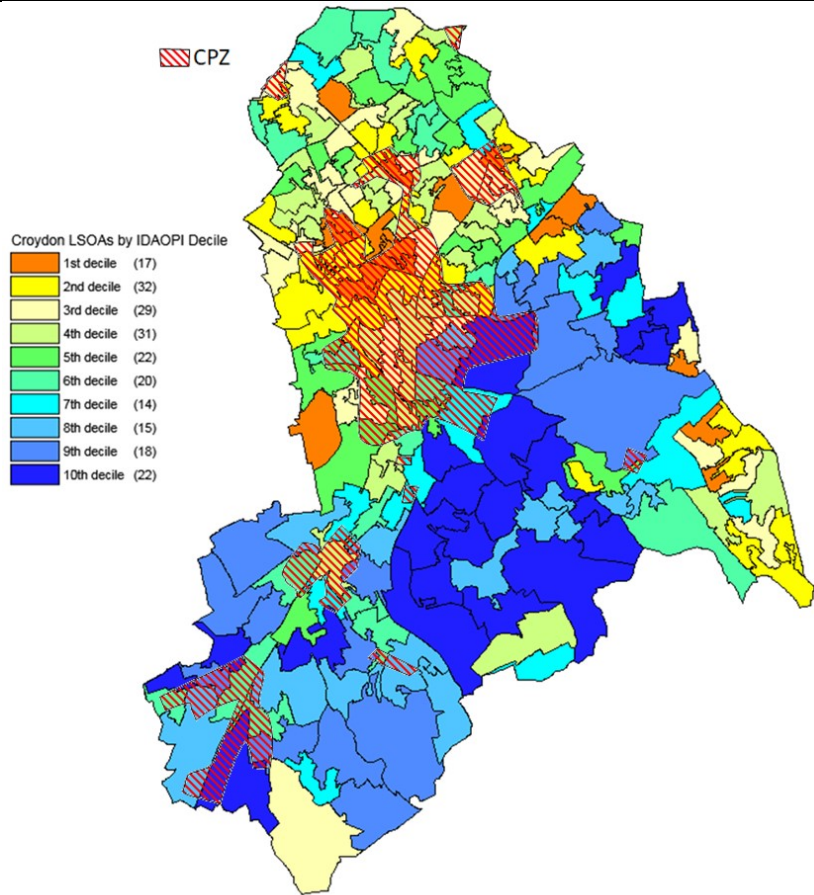
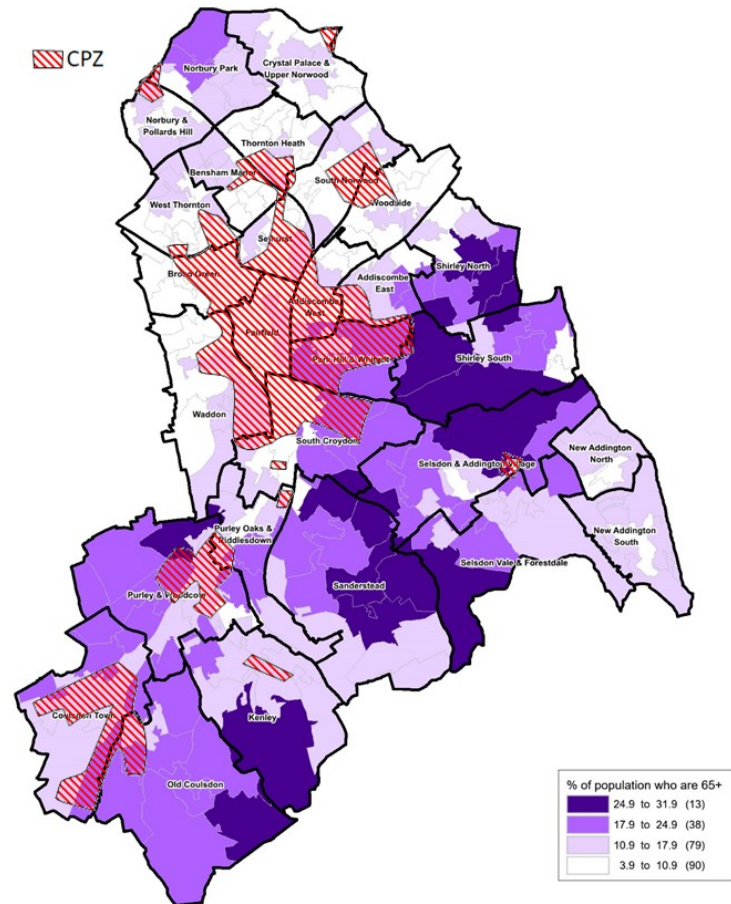


Figure 6 – CPZ P&D areas overlapped with income deprivation amongst the over 60-year olds.
(source: www.croydonobservatory.org)

**% of population who are 65+
2016 Mid Year Estimates**



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Figure 7 – CPZ P&D areas overlapped with density of over 65-year olds.
(source: www.croydonobservatory.org)

In Croydon 17% of older people are considered to be income deprived (source: www.croydonobservatory.org). Figure 6 indicates that older people living in CPZ P&D areas are disproportionately deprived. Figure 7, however, indicates that the older population is significantly lower within the CPZ P&D areas.

In context of the 160,000 vehicles registered in Croydon, the higher parking charges band accounts for about 19,000 vehicles in the highest emission group (i.e. the 12% most polluting cars) and about 6,000 that predate Mar 2001 (i.e. c.3.7% designed prior to tighter emission standards being introduced). These vehicles are owned by residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. Although low income may be the consequence of a protected characteristic, low income in itself is not a protected characteristics. A resident with a threshold mobility impairment, including if driving a high polluting or older car, will be eligible for a disabled Blue Badge and free parking.

Unavailability of space for parking a car in a CPZ

- 3.11 Car ownership in Croydon has increased by 40% in the last 2 decades and is forecast to continually grow at 2% each year – when assuming no intervention. This has meant that there is an increasing pressure on over-subscribed parking spaces and vehicle drivers have become desensitised to the charges applied, hence reducing the effectiveness of charges to manage demand. The current charges are deemed too low for achieving the parking demand management objectives. This is evident from the Parking Policy engagement where many who declared a disability stated it is too difficult to find a parking space near to home. The recent Covid-19 lockdown situation, with more drivers staying at home, created an overwhelming access problem – where some residents had to park many roads away from their homes, in places where they inadvertently impeded residents in these other areas.

Influencing the overall number of non-essential cars parked on the roads in the borough, and in parking congested CPZ P&D in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate and thereby advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share such characteristics thus supporting the Council's public Sector equality duty.

4 Summary

- 4.1 There is no evidenced information that the emissions-based and increased parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act).
- 4.2 Whilst those on lower incomes will not be in a position to replace an older higher-polluting car with a new cleaner one, being on a low income is not alone a protected characteristic. Those with mobility relevant characteristics are generally exempt from parking charges.
- 4.3 In the context of car parking in P&D zones and the proposed emission-based parking permit charges, the Equalities Assessment concludes that there are no adverse PSED impacts as a result of this decision. One of the main purposes of the decision is to support the health and wellbeing of residents of the borough with a particular focus on those most susceptible to air pollution. The majority of P&D zones are located in areas more affected by pollution, as detailed below, and therefore impact on areas to which the proposed emission based charges will apply. As such, it is considered that the proposed decision has a positive impact on the duty to seek to

eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act. In addition, as many of the areas most affected by pollution are those which correspond with areas of deprivation in the borough and the majority of P&D zones are similarly located in those areas this decision will seek to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and afford a better air quality and level of health across more areas of the borough. The Equalities assessment also concludes that this decision will not have any adverse impact on the fostering of good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 4.4 It is not considered that the proposed charges significantly reduce the opportunities for persons who share protected characteristics and who are not eligible for a disabled blue badge. The proposal on balance helps to reduce inequality for those persons who share protected characteristics, in particular for those who are vulnerable to air pollution and who have difficulties accessing their homes and travelling to other destinations, which disproportionately are the young, the elderly and those who live in some of the more deprived areas of the borough. The proposal in effect supports the Council in its duty under the Equality Act 2010.
- 4.5 The many respondents to the parking policy engagement (183) and the emission-based parking permit charges consultation (1,149) have not suggested any alternative solution, which could sufficiently address equality and air quality objectives, without the introduction of a parking charges differential.
- 4.6 Surplus from parking income is ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking charges therefore indirectly, and incidentally, support the portion of the elder population that do not have a car or who choose to use public transport.
- 4.7 The emission-based parking charges will effectively address inequality issues, by helping to encourage a gradual switch to lesser polluting cars and also help influence the choices of those who are able to give up a non-essential car.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Additional information needed to determine impact of proposed change

Table 1 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.		
Additional information needed	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>Improvement in air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>Surplus from parking 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 supports the portion of the elder population that do not have a car or who choose to use public transport.</p>	<p>Impact for older age group due to frailty and reliance on car travel and parking. This risk is mitigated by implementing measures to exempt such people and this will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	Air Quality Action Plan 2017-22

	<p>Air pollution contributes to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly</p> <p>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% (205) 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.</p>		
Disability	<p>Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>All 11,459 individual and 71 organisational blue badges holders in Croydon are exempt from the proposed parking charges. Free-of-charge disabled Companion Badges, for those who support a person with a Blue Badge, are also exempt from parking charges.</p> <p>Reduction in non-essential car ownership and use (i.e. less driving to the shop) can potentially enhance accessibility for essential car users.</p>	<p>Potential negative impact on people with disabilities &/or long term health conditions. This is mitigated by implementing measures to exempt such people and this will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	<p>Air Quality Action Plan 2017-22</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation scheme, in association with Disabled Motoring UK.</p>
Gender	<p>Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p>		<p>Air Quality Action Plan 2017-22</p>

Gender Reassignment	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Marriage or Civil Partnership	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Religion or belief	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Race	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Sexual Orientation	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Pregnancy or Maternity	Improvement in air quality and reduced exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for	Potential negative impact during latter stages of pregnancy, where for a period the car can become more essential for travel.	Air Quality Action Plan 2017-22

	<p>all residents and visitors by implementing parking related measures.</p> <p>Air pollution inside a car in congested traffic is higher than on the pavement. The impact of air pollution on the unborn child, during earlier stages of pregnancy, must also be considered. Reductions in car dependency and air pollution are positive contributions.</p>	<p>The temporary nature of the later stage of pregnancy makes it unlikely that increased parking charges, in context of overall car ownership costs, would result in financial hardship and substantially additional reduction in ability to participate in public life.</p> <p>With regards to maternity: Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	
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Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)

2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 5 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	1	2
Disability	2	2	4
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	2	2

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4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Table 5 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Age	Potential financial impact for older age group due to frailty, who relies on the car for travel and access.	Frailty is an eligibility criteria for a Blue Badge. This includes those without capacity to drive, for use by relatives and other in their support network carrying them as passengers. Surplus from parking charges are ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such	Parking	Upon adoption of the proposed parking charges

		<p>as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly supports the portion of the elder population that do not have a car or who choose to use public transport.</p> <p>Where a child has a special transport needs then they would typically be entitled to a Blue Badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p>		
Disability	Potential financial impact on people with disabilities and/or long term health conditions, who relies on the car for travel and access.	<p>The holders of 11,459 individual and 71 organisational blue badges issued in Croydon are exempt from the parking charges. Eligibility is granted for both physical and mental (hidden) disabilities, which impairs mobility.</p> <p>The Blue Badge companion badge and certain non-vehicle specific charity badges for volunteers who visit and support vulnerable residents are exempt from parking charges.</p>	Parking	Upon adoption of the proposed parking charges

Equality Analysis

		<p>Additionally, some essential drivers with mobility impairment have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health condition for people aged 16 to 64.</p> <p>This will be consulted upon before a final decision on the revised parking charges is reached.</p>		
Pregnancy or maternity	Potential financial negative impact during latter stages of pregnancy, where for a period the car can become more essential for travel.	<p>The temporary nature of the later stage of pregnancy makes it unlikely that increased parking charges, in context of overall car ownership costs, would result in financial hardship and substantially additional reduction in ability to participate in public life.</p> <p>Air pollution inside a car in congested traffic is higher than on the pavement. The impact of air pollution on the unborn child, during earlier stages of pregnancy, must also be considered. Reductions in car dependency and air pollution are positive contributions.</p> <p>Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.</p>	Parking	Upon adoption of the proposed parking charges

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		This will be consulted upon before a final decision on the revised parking charges is reached.		
Race	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Sex (gender)	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Gender reassignment	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Sexual orientation	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Religion or belief	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		
Marriage/civil partnership	None yet foreseen.	This will be consulted upon before a final decision on the revised parking charges is reached.		

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p>The prior analysis of the engagement and consultation results has found that no individual protected sub-group stands out as having responded negatively to the principles behind emission-based and increased parking charges – in terms of impact on their protected characteristics. There has been some elevated concern about insufficiency in the parking bays accessible for the disabled and that disabled drivers, with an essential car use need, may have to start paying for parking. These concerns are recognised and mitigated in the policy actions plan.</p> <p>Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people with protected characteristics and some who cannot immediately afford to replace their older cars. We must however 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.</p> <p>In context of the 160,000 vehicles registered in Croydon, the higher parking charges band accounts for about 19,000 vehicles in the highest emission group (i.e. the 12% most polluting cars) and about 6,000 that predate Mar 2001 (i.e. c.3.7% designed prior to tighter emission standards being introduced). These vehicles are owned by residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. Although low income may be the consequence of a protected characteristic, low income in itself is not a protected characteristics. A resident with a threshold mobility impairment, including if driving a high polluting or older car, will be eligible for a disabled Blue Badge and free parking. The proposed charges can therefore not be generalised as having a disproportionate effect on residents with protected characteristics.</p>	X

Equality Analysis

	<p>Influencing the overall number of cars parked on the roads in the borough, and in parking congested P&D zones in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate where participation is currently disproportionately low.</p> <p>Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution 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.</p> <p>There is no evident information to suggest that the emissions based parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act). Whilst those on lower incomes will not be in a position to replace their vehicles with new ones, being on a low income is not alone a protected characteristic.</p> <p>It is considered that the reasons for introducing emissions-based parking charges and a 20p/30min increase outweighs the reasons for not implementing them.</p> <p>This is an initial conclusion, which will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached.</p> <p>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p>	
Adjust the proposed change	<p>The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be adjusted if the consultation identifies unacceptable adverse effects on one or more protected groups that are not justified and can be mitigated.</p> <p>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be continued if the advantages outweigh the disadvantages and do not lead to unlawful discrimination. In such case we will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change.</p>	

Equality Analysis

	<p>However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.</p> <p>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</p>	
Stop or amend the proposed change	The initial conclusion will be reviewed subject to a pending consultation inviting objections to the proposal and which will be re-considered before a final decision on the revised parking charges is reached. Our proposed change must be stopped if the consultation identifies unlawful discrimination or otherwise unacceptable adverse effects on one or more protected groups that are not justified and cannot be mitigated.	
Will this decision be considered at a scheduled meeting? Traffic Management Advisory Committee	<p>Meeting title: Parking charges review January 2021</p> <p>Date: 14 October 2020</p>	

Supporting Documents:

1. Cabinet report on parking policy and emission-base parking charges, 25 March 2019:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=1553&Ver=4> (item 28/19)
2. TMAC report on the outcome of consultation on emission-based parking permit charges, 24 July 2020:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=173&MId=2065&Ver=4> (item 4/19)
3. Scrutiny call-in report on the decision to implement emission-based parking permit charges, 2 September 2019:
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=2086&Ver=4>

7. Sign-Off

Equality Analysis

Officers that must approve this decision			
Equality lead	Name: Yvonne Okiyo	Date: 09.09.2020	
	Position: Equalities Manager		
Director	Name: Steve Iles	Date: 09.09.2020	
	Position: Director of Public Realm, Place		