

<b>REPORT TO:</b>	<b>Traffic Management Advisory Committee</b> <b>7 July 2021</b>
<b>SUBJECT:</b>	<b>Objections to Proposed Introduction of Electric Charge Point Parking Bays – Elmgrove Road, Sundridge Road, Northborough Road and Kemble Road</b>
<b>LEAD OFFICER:</b>	<b>Sarah Hayward, Interim Executive Director of Place</b>
<b>CABINET MEMBER:</b>	<b>Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon</b>
<b>WARDS:</b>	<b>Addiscombe East, Norbury &amp; Pollards Hill and Waddon</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b>	
<p>This report is in accordance with objectives to improve the safety and reduce obstructive parking on the Borough's roads as detailed in:</p> <ul style="list-style-type: none"> <li>• Croydon Local Plan – Feb 2018</li> <li>• Local Implementation Plan 3; Section 2 Croydon Transport Objectives</li> <li>• Croydon's Community Strategy; Priority Areas 1, 2, 3 &amp; 4</li> <li>• The Croydon Plan 2<sup>nd</sup> Deposit; T4, T7, T35, T36, T42 and T43</li> <li>• Croydon Corporate Plan 2015 – 18</li> <li>• Croydon Parking Policy 2019 – 22; Section 2</li> <li>• <a href="http://www.croydonobservatory.org/strategies/">www.croydonobservatory.org/strategies/</a></li> </ul>	
<b>FINANCIAL IMPACT</b>	
These proposals can be contained within available budget.	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision</b>	
<b>1. RECOMMENDATIONS</b>	
That the Traffic Management Advisory Committee recommend to the Cabinet Member for Sustainable Croydon that the Cabinet Member:	
1.1 Consider the objections received to the proposal to introduce Electric Vehicle Charging Bays in Elmgrove Road and Sundridge Road, Addiscombe East, Northborough Road, Norbury & Pollards Hill and Kemble Road, Waddon.	
1.2 Agree for the reasons detailed in Section 4 to introduce Electrical Vehicle Charging Bays in Elmgrove Road, Sundridge Road, Northborough Road and Kemble Road as illustrated in the attached drawings.	

- 1.3 Delegate to the Public Realm Directorate the authority to make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended) in respect of the above proposals.
- 1.4 Inform the objectors of the decisions.

## **2. EXECUTIVE SUMMARY**

- 2.1 The purpose of this report is to enable consideration of the objections received from members of the public following the formal consultation process on the proposals to introduce Electric Vehicle Charging Bays in Elmgrove Road, Sundridge Road, Northborough Road and Kemble Road. The formal public notice to introduce the proposals was published on 13 May 2021 and the public had up to 28 days to respond.
- 2.2 Officers have fully considered the objections and this report details the objections and the Officers' recommendations in response to these.

## **3 BACKGROUND**

- 3.1 To clean up London's air and rid the Capital of the most polluting vehicles, the Mayor has an ambition to make London's transport network zero carbon by 2050. However, to achieve this there is a need to transform the Capital's streets. Supporting and accelerating the shift to zero emission technologies, through introduction of a London-wide EVCP network, is key to increasing the use of electric vehicles across the Capital and delivering the Mayor's vision.
- 3.2 Under the latest Local Plan, the Council has committed to the phased introduction of electric charging points across the borough with the ambition to realise 400 public and residential charging points by the end of 2022. This commitment was also one of Labour's manifesto pledges in 2018.
- 3.3 Various companies are installing EV charging points which vary in their capacity from little more than the domestic rates of around 3kw/hr up to 100kw/hr or more enabling vehicles to receive a 20 to 80% charge within 30 to 40 minutes.
- 3.4 Companies that have already installed charging points, or are planning to, include Source London, Go Ultra Low City Scheme (GULCS), Ubertricity, Virgin Media / Liberty Charge and ESB for rapid and ultra-rapid charges mainly used on the Transport for London Road network.
- 3.5 This report refers to objections to proposals for the introduction of the Liberty Charge points which is working with Virgin Media to provide free charging points in the Borough and using a combination Virgin's supply and Network Power as appropriate. In order for these to be economically viable they are looking at 2 double head charging points to be able to charge 4 EVs at any one time. The sites being chosen are where requests have been received mainly from local residents and where 4 bays can be positioned that cause minimal local issues, so are generally not directly outside frontages to homes.

## **4. OBJECTIONS AND RESPONSES**

4.1 Following delegated authorisation through the Executive Director of Place and a public notice of the proposals to introduce Electrical Charge Vehicle Charging Point bays at 19 locations; objections have been received to the proposals at Elmgrove Grove by Shirley Road, Sundridge Road by Dalmally Road, Northborough Road by Grandon Road and Kemble Road by Vicarage Road. The stated grounds for the objections and the officers' responses and recommendations are outlined in the paragraphs below.

### **4.2 Elmgrove Road – Addiscombe East**

Nineteen objections from 17 households in Elmgrove Road, Shirley Road, Brockenhurst Road and Bingham Road were received to the proposal for four electrical Charge point bays to be sited in Elmgrove Road close to Shirley Road. The objections are listed as follows:

#### **Objections**

- Currently there is insufficient space for parking on-street in the area for residents due to the number of dropped kerbs and multiple car households and these bays will compound this problem.
- There is a high proportion of non-residential parking in the area due to the school, library and number of businesses in Shirley Road. Permit parking is needed.
- There are no Electric Vehicles in the road.
- These bays should be in a more prominent position.
- Local residents should have been notified of the proposals and relying on a public notice fixed to a lamp column is not acceptable.
- These bays should be provided in roads where residents have off-street parking where there would be less impact for residents.
- EVs are not that green.
- There is a potential impact on health for charging points.
- There is a higher proportion of elderly residents in this area who rely on visitors including health workers and these bays will compound parking issues for them.
- Poorest residents will be impacted most as they will not be able to afford the cost of electric vehicles.
- The bays should be limited to 2.
- Criteria for off-street parking has changed to make this harder so residents rely on on-street parking.

#### **Support**

- One resident of Coniston Road has given their support to the proposed EV charge bays and simply stated that these bays are needed in roads where the majority of residents do not have off-street parking.

### 4.3 Officers' Response

- Under the latest Local Plan, the Council has committed to the phased introduction of electric charging points across the Borough with the ambition to realise 400 public and residential charging points by the end of 2022. This commitment was also one of Labour's manifesto pledges in 2018.
- In order to fulfil these targets there needs to be a range of charging points across the Borough to meet the demand in electric vehicles which is set to grow exponentially within the next 10 years with the Government now set to ban new petrol and diesel vehicles (including most hybrids and plug-in hybrids) by 2030. The price of these vehicles is set to full significantly as supply increases to meet this demand.
- The demand for on-street EV charging points is and will be much higher in the northern half of the Borough where fewer residents have off-street parking and inevitably most of the proposed locations are areas where parking demand is high. The usage of these bays will increase in time with the growing demand in electrical vehicles and having availability to charging points will encourage residents to obtain these vehicles.
- The bays in Elmgrove Road are aimed at residents and for long-term parking and charging with relatively low rates of charge rather than short term parking at destination charge points where the rates for charging are higher. This site has been chosen following requests from local residents.
- Public notices were published in the Sutton & Croydon Guardian and London Gazette and also on the Croydon website. A public notice was also affixed to a nearby lamp column and delivered to addresses directly affected by the proposals.
- There is no evidence that Electric Charge points are detrimental to health and power levels are relatively low. Health benefits are for reducing local pollution especially in busy areas where vehicle levels and congestion is high and increasing concern over the effects on breathing polluted air.
- Providing opportunities for charging electric vehicles in this area will act as an opportunity for local residents to obtain these vehicles and negate any perceptions of loss of parking. Providing 4 bays together increases the opportunity and confidence for these residents to find a space.

### 4.4 Sundridge Road – Addiscombe East

Three objections have been received from local residents to the proposal for 4 EV bays in Sundridge Road by Dalmally Road. The objections are listed as follows:

- Currently there is insufficient space for parking on-street in the area for residents due to the lack of space and number of multiple car households and these bays will compound this problem.
- The bays will attract more traffic in an already busy area.

- These bays should be provided in roads where residents have off-street parking where there would be less impact for residents.
- Electric vehicles are dangerous as you cannot hear them.
- Local residents should have been notified of the proposals and relying on a public notice fixed to a lamp column is not acceptable.
- Drivers will be turning up at all times of the day and night and will create a disturbance for local residents.

#### 4.5 **Officers' Response**

- The demand in electric vehicle will grow exponentially over the next few years and on-street charging points will become increasingly attractive especially in areas such as Sundridge Road where very few residents have the luxury of off-street parking. These bays have been requested by local residents and are aimed at them for long term charging events and will therefore not reduce the amount of on-street parking available for residents.
- There is no evidence that charging points creates additional traffic especially for those lower power charging points aimed at relatively long charging periods and it is unlikely that they will be used by motorists other than local residents. Rapid and ultra-rapid charging points are aimed at short term parking and will create slightly more traffic.
- Electric vehicles generate sound at low speeds to act as a warning to vulnerable road users. At higher speeds tyre and wind noise is similar to combustion powered vehicles.

#### 4.6 **Northborough Road – Norbury & Pollards Hill**

Four residents of Northborough Road have objected to the 4 EV bays proposed in the road close to the junction with Grandon Road. The objections are listed as follows:

- Currently there is insufficient space for parking on-street in the area for residents due to the lack of space and these bays will compound this problem.
- Local residents should have been notified of the proposals and relying on a public notice fixed to a lamp column is not acceptable.
- Drivers will be turning up at all times of the day and night and will create a disturbance for local residents.
- Bays would be better located in a more prominent position such as closer to London Road or at one of the local businesses.
- Northborough Road is very busy and there have been a number of accidents – these bays will compound these issues.
- Would cause issues for insurance if unable to park close to home address.
- There is a potential impact on health for charging points and EV / hybrid vehicles.
- Northborough Road forms part of a conservation area and such charging points are not appropriate.

#### 4.7 **Officers' Response**

- Responses to most of the above points have already been included in the responses to objections received to the EV bays proposed for Elmgrove Road and Sundridge Road. The bays for Northborough Road are aimed at local residents and as per the other locations are proposed following local requests. It is not envisaged that drivers from other areas will specifically be parking in these bays as this may not be a convenient location. Prominent locations for EV bays such as main roads or businesses are more suitable for short term rapid charging points.
- These bays should therefore not affect traffic or parking any more than general parking events by residents.
- There is no evidence that insurance companies would penalise a resident if they are unable to park their vehicle on-street close to their address and many residents have no option but to park in neighbouring roads when there are no spaces available outside of close to their home.
- There is no evidence that there are health issues for driving an electric or hybrid vehicle and if anything a vehicle that emits no potentially dangerous fumes will be more beneficial to the driver, passengers and other road users including residents.
- EV charging bays can complement a conservation area. All charging points are proposed to be coated in black paint to match the current policy for street furniture.

#### 4.8 **Kemble Road – Waddon**

One resident has objected to the proposed 4 EV bays in Kemble Road by Vicarage Road. The objections are listed as follows:

- Currently there is insufficient space for parking on-street in the area for residents due to the lack of space and these bays will compound this problem.
- There is a high proportion of non-residential parking in the area due to the nearby Wandle Park Tramstop and visitors to Wandle Park. Permit parking is needed.
- Four is too many bays for such a location
- Free parking will be encouraged within a CPZ where others have to pay for parking or permits.

#### 4.9 **Officers' Response**

- Request for EV charging points have been received in this area which would be ideal due to the number of terrace houses and flats where there is no off-street parking.
- Spaces are usually found in this area during the daytime when a higher proportion of residents use their vehicles.

- Providing 4 bays in one location is more attractive to EV users as there is more likelihood of a vacant bay being available and reduces the need to search for bays and unnecessary journeys.
- The majority of prospective EV charge point users are likely to be local residents as the bays are for longer term parking and these are more likely to be existing permit holders as vehicles would not be constantly charging. Once charged they will need to find a vacant Permit / Payment bay to avoid receiving a Penalty Charge Notice for parking whilst not charging.

#### 4.10 Conclusion

It is important to emphasise that the demand for Electric Charge vehicles including plug in hybrids is likely to increase exponentially over the next few years with combustion engine vehicles being banned by 2030. It is essential that the infrastructure is put in place where the demand is likely to be high such as roads where few residents have the luxury of off-street parking. Most of the objections relate to concern over the effect these bays will have on existing residents but it is quite possible that the same residents will be requesting such bays in the near future and it is proposed that the bays should be introduced without delay.

## 5 CONSULTATION

- 5.1 The purpose of this report is to consider comments and objections from the public following the giving of public notice of the proposals. Once the notice was published, the public had up to 28 days to respond.
- 5.2 The legal process requires that formal consultation takes place in the form of Public Notices published in the London Gazette and a local paper (Croydon Guardian). Although it is not a legal requirement, this Council also writes to affected frontages to inform them of the proposals.
- 5.3 Organisations such as the Fire Brigade, the Cycling Council for Great Britain, The Pedestrian Association, Age UK and bus operators are consulted separately at the same time as the public notice. Other organisations are also consulted, depending on the relevance of the proposal. No comments were received from any of these organisations.

## 6. FINANCIAL CONSIDERATIONS

Funding for the introduction of Electrical Car charging point bays is through Government Grants and there are no financial implications for the Council for the implementation of 19 sets of bays being introduced by Virgin Media on behalf of Liberty Charge. There is capital budget allocation of £500k for charging points which will be used for spend incurred in implementing the scheme of which £258k is allocated to Parking for installations.

## 6.1 Revenue and Capital consequences of report recommendations

	Current Financial Year 2021/22 £'000	M.T.F.S – 3 year Forecast		
		2022/23	2023/24	2024/25
		£'000	£'000	£'000
<b><u>Revenue Budget available</u></b>				
Expenditure	100	0	0	0
Income	0	0	0	0
<b><u>Effect of Decision from Report</u></b>				
Expenditure	0	0	0	0
Income	0	0	0	0
<b>Remaining Budget</b>	0	0	0	0
<b><u>Capital Budget available</u></b>				
Expenditure	258	0	0	0
<b>Effect of Decision from report</b>				
Expenditure	31	0	0	0
<b>Remaining Budget</b>	227	0	0	0

## 6.2 The effect of the decision

6.2.1 The cost of introducing 19 sets of Electrical Vehicle bays by Virgin Media on behalf of Liberty Charge has been estimated at £30,800. This includes legal costs, civils work to connect to the supply and install the charge points and other costs such as posts, signs and lining work.

6.2.2 These costs can be contained within the available capital budget for 2021/22.

## 6.3 Risks

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



## **6.4 Options**

6.4.1 Not introducing these bays could have implications on the delivery of this project and the commitments for providing sufficient on-street Electric Vehicle bays to meet the future demand.

## **6.5 Savings/ future efficiencies**

6.5.1 No further savings have been quantified, although enforceable parking bays do make an income contribution to the revenue budget.

6.5.2 Approved by: Geetha Blood, Interim Head of Finance, Place and Resources on behalf of S151 officer.

## **7 COMMENTS OF COUNCIL SOLICITOR AND MONITORING OFFICER**

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

7.2 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.

7.3 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.

7.4 Recent High Court judgment confirms that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

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

## **8. HUMAN RESOURCES IMPACT**

8.1 There are no human resources implications arising from this report.

8.2 Approved by: Jennifer Sankar, Head of HR Place & Housing, for and on behalf, of Sue Moorman, HR Director on 22 June 2021.

## **9. EQUALITIES IMPACT**

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

## **10. ENVIRONMENTAL IMPACT**

10.1 There are no environmental impacts arising from this report.

## **11. CRIME AND DISORDER REDUCTION IMPACT**

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

## **12. REASONS FOR RECOMMENDATIONS**

12.1 The recommendations are for new 'At any time' waiting restrictions and loading restrictions at locations across the Borough where there are particular concerns over safety and access due to obstructive parking. At each location surveys have been undertaken which confirm that road safety issues exist and double yellow lines/loading restrictions as appropriate, would encourage the safe movement of vehicular and other traffic (including pedestrians).

## **13. OPTIONS CONSIDERED AND REJECTED**

13.1 Instead of double yellow line waiting restrictions the alternative would be to introduce single yellow line daytime restrictions. However, as most of the above locations are at junctions and other locations where parking could create obstruction at any time, double yellow lines are more appropriate as they reduce obstructive parking at all times.

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**APPENDICES:**

Electric Vehicle Charging Bay drawings, for:

Appendix 1 – Elmgrove Road

Appendix 2 – Sundridge Road

Appendix 3 – Northborough Road

Appendix 4 – Kemble Road

**BACKGROUND PAPERS:**

Local Government Act 1972