

OCRA Chair

Jayne Rusbatch
Head of Highways and Parking 6th May 2024
3rd Floor, Zone C Bernard Weatherill House
London Borough Croydon
8 Mint Walk
Croydon, CR0 1EA

9th May 2024

Dear Jayne

Parking Charges Statutory Consultation 18th April 2024

We write on behalf of the residents of Old Coulsdon and your proposals to include two of our local shopping parades, Tudor Parade and Lacey Green into your new plan. Neither of these areas have ever been previously metered or controlled in such a way as is proposed. Whilst we accept this will assist against the very few who park for more than one hour, we feel it will cause a detrimental impact on our local shops.

By introducing RingGo we feel you are discriminating against the very customers who use local shops, and those who do not have or cannot use 'smart' phones, particularly the elderly which make up a large proportion of our demographic.

This scheme will affect both the lives of our residents and economy of our local shops, we urge you to re-think.

The Government guidelines on enforcement issued by the DfT require the local economy to be taken into consideration.

www.gov.uk/government/publications/civil-enforcement-of-parking-contraventions/guidance-for-local-authorities-on-enforcing-parking-restrictions

Yours sincerely

OCRA Chair



Coulsdon West Residents' Association

thecwra.co.uk

7th May, 2024

Jayne Rusbatch
Head of Highways and Parking
Croydon Council,
Croydon, CR0 1EA

Dear Ms Rusbatch

Re: Parking Charges Statutory Consultation 18th April 2024

Please find Coulsdon West Residents' Association's response to the Parking Charges consultation.

I am indebted to East Coulsdon RA's work in producing the arguments here, which we are in complete agreement with.

Thank you for granting/retaining the district centre 1-hour free parking and a second hour paid for at a sensible price. It is excellent that this will be rolled out across the Borough, supporting the district centre businesses and their customers.

It is disappointing that you intend to control the currently 1-hour free and second hour no return to local area shopping parades such as the Tudor Parade and Lacey Green in Old Coulsdon along with Chipstead Valley Road (at the junction with Rickman Hill) and similar parades elsewhere. These have never been metered or controlled before.

Whilst it will deter long term parking, it is likely to have a detrimental impact on these local shops, and therefore, the local economy. The Government guidelines on enforcement issued by the DfT require the local economy to be taken into consideration. www.gov.uk/government/publications/civil-enforcement-of-parking-contraventions/guidance-for-local-authorities-on-enforcing-parking-restrictions

Enforcing use of the parking app, phoning RingGo or, in the absence of these, having to walk to a Pay Point (having located one), will be inconvenient for very short-term parking. This is particularly hard on our residents that do not use mobile or smart phones, particularly the elderly of which there is a large number in the local area.

We believe that there should be a 15-minute grace period to cater for this. This grace period would also enable people who only want to park or wait for such a short time, the ability to do so without the fear of incurring a penalty charge. This is common practice in retail outlets with parking – to allow 10-15 minutes 'uncontrolled short term parking' to pick up or drop off or in some cases enter and leave the car park if there are no vacant spaces. Railway stations allow a 20-minute free period for dropping off and picking up people or for making and enquiry at the booking office. Again, there are Government guide lines specifically covering this case – they suggest at least 10 minutes.

Lion Green car park is essential to the Coulsdon town centre economy, and it relies on the correct balance of short-term and long-term bays for efficient use. The existing free parking after 6.00pm and all day on Sundays are very important to the economy of Coulsdon and must remain. We would also expect the new parking rules to be administered firmly and fairly.

Yours Sincerely,

Chair CWRA

0189 – OBJECTION – CROYDON PARKING CHARGES – PAY-BY-PHONE ONLY

7-5-24

cc Croydon Contact Centre, Parking Design, Mayor, Cabinet, CNT cllrs, NST, ML, JST, DH

Dear David Wakeling

I write to object to various of the council's parking plans, as per the consultation which began on 18-4-24.

0 METHOD OF SUBMITTING AN OBJECTION

I note the council suggests using the Trafweb application. However I cannot get this to work – and it has a worrying countdown clock. It seems to have a single box for a mass of text – which prevents effective text layout.

No DPA statement re use of personal data, how long retained etc.

The app appears to require a phone number – wholly inappropriate.

The council may ask for a name and address – postal or email, but not for any other identification.

It is wrong for the council to demand that the public used this unsatisfactory app, and do not provide an email address for the purpose.

This imposes an unreasonable burden on an objector, and seems to be a way to make it convenient for the council to handle an objection, but inconvenient for the public to make one.

1 UNLAWFUL + IMPROPER CONSULTATION PROCESS

This follows on from the improper and abusive practice of the previous administration, so much criticised by the former opposition.

There are no street notices in many of the locations affected by the changes proposed.

There is no simple guide to the proposals, just a complicated long document, a real burden to read through on a pc – and near impossible on a mobile phone.

We may be sure that many will not know what is proposed – nor how to respond.

The public consultation in October 2023 did not consult on many of the proposals now advanced.

There was no mention of any changes to bays with free time-limited parking.

PJM submissions by email re consultation are not included in the Consultation Report, although submitted during early October 2023, and assured they would be.

The council should consult properly, by allowing a six-week period, properly announced in advance.

Then it should offer an explanation of what is proposed, and give the public the opportunity to respond and be heard on what is proposed.

2 PAY BY PHONE ONLY

This is an unreasonable change.

The system may be fine for those who park regularly and become used to it. It is wholly unsuitable for the occasional user – who may live far away.

It is time-consuming to set up the service.

It is an additional time-consuming burden to use this – notably when parking for free.

This means unproductive time wasted when parking – increasing pressure on parking bays to no benefit.

Pay by phone means using an app on a mobile phone.

Then personal and financial data has to be submitted and stored.

This raises issues of data security.

Even official government websites have proved insecure – Electoral, Commission data, Armed Forces data.

Facebook has had issues.

Many people avoid using Internet for personal financial transactions simply due to concerns over this.

The council needs to provide alternative means of payment at all locations.

There are also issues over age discrimination – see below.

3 FREE TIME-LIMITED PARKING

Councils all over outer London and in Surrey, including TFL, offer free time-limited parking.

Sutton and Waltham Forest for example have hundreds of free bays with a simple time limit.

Further examples will follow.

There is no requirement to register arrival, or to get any ticket.

The bays are enforced by patrols who use hand-held devices to log vehicles and check for any over-staying or reparking.

They have no problem with this, and have no plans to change the system.

There is no reason that Croydon cannot do this.

Reasons given are wholly inconsistent with established practice across the country.

Instead Croydon plans to impose a requirement to register arrival and location by phone.

This is wholly unreasonable, and wholly unjustified.

The Cabinet report does not explain.

It takes extra time to register, which means a net loss of parking with increased dead time.

This wrong system can only discourage parking, and harm the local economies.

4 UNLAWFUL AGE DISCRIMINATION

I have already sent a complaint over this element.

In summary, older people are far less likely to use a mobile phone, to use a smartphone, to use the Internet on their phone, to use apps on their phone, and to use Internet banking.

There are other ways to manage payment, and no possible justification for requiring use of phone to park where no payment is required.

Councils were reminded by the Secretary of State earlier in the year of their duty to ensure they do not discriminate in their decision making against older people or those with vulnerabilities.

The council's claim that "Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination" is patently untrue and false.

The council's own Equality Analysis shows further up the page as much.

5 INAPPROPRIATE STANDARDISATION

Currently Croydon has a range of time limits for free parking, with various no return periods, These have been set to reflect local conditions.

This is normal across London, with councils having a wide range of different times allowed.

Croydon is proposing a standard two-hour time limit with one hour free, with compulsory phone registration,

This is not FREE parking.

In addition, some locations need a short time period, such as 30 minutes, so that many can park for short periods.

In Coulsdon and elsewhere the one hour time limit is the right time, with bays heavily used. If people pay to park for two hours, that can only mean fewer bays available to park.

6 TWO HOUR PARKING CHARGE FAR FROM NOMINAL

A NOMINAL charge means 10p to perhaps 40p.

£2.40 to park for an hour is a high charge – in no way nominal.

There is no justification for this.

The bays in Norbury work well with two hours free.

Imposing this charge will harm the local area.

In addition, people will simply park elsewhere on street for free, leaving many of the bays empty.

7 EVENING + NIGHT TIME PARKING CHARGES IN CAR PARKS

Parking in the evening and at night has always been free - from 6pm until 7am or later.

This encourages people to park in the car park, rather than on street.

Imposing these charges will harm the night-time economy.

Revenue raised will be very low.

It will also lead to more congestion on the road network.

8 BANK HOLIDAY PARKING

Many councils treat bank holidays as Sundays for parking purposes – see appended file.
For example, Christmas Day, Good Friday and Bank Holidays are an exception to parking controls.

Croydon should follow this normal practice.

9 EMISSION BASED PARKING CHARGES

Croydon claims the new charges are “intended to encourage lower emission vehicles and to help address air quality and public health objectives”.

However the council is proposing steep increases in parking charges for low or medium emission vehicles.

That change, with much reduced discounts for zero and low emission cars, goes directly against this stated objective.

The council is also proposing huge increases for some permits – often hundreds of pounds.

There is no justification for making some pay over £1300 for a permit which now costs £700, £1660 for one at £720, and £1126 for £600.

These are clearly extortionate charges and extortionate increases.

Many would be in great difficulty in even funding such expensive permits.

In addition, the council should allow six-month and three-month permits – why not monthly – that is normal on public transport?

This is clear council abuse of its powers.

10 OTHER ISSUES

10.1 NO RETURN FOR TWO HOURS

How will the parking app know when someone has left the parking place?

Thus if I park at 1015 and leave at 1020, I am allowed to park again at 1220.
How will the parking app manage this?

10.2 BUSINESS PERMITS

Why is the quarterly business permit being withdrawn – no reason is given – Cabinet Report says it is maintained?

Some business drivers will find it hard to pay the very large annual fee charged in some situations

11 CONCLUSION

These charges are badly considered, and will harm the public.

Those using cars and vans will be oppressed by the council.

Some will park less often – or not at all.

“intended to improve access to amenities to serve local shoppers and the economies of the district centres”.

In fact these high charges, inconvenient and expensive, will directly harm access to shops, and undermine the local economy.

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It is noteworthy that the council cannot offer any economic analysis, or any reason to believe the council claims.

Requests for this have been met with “we don’t know” or “we have not done the analysis”.

The council is clearly using speculation, and obfuscating over the obvious fact that higher charges mean more money for the council – and less usage by the public.

The Cabinet Report shows an increase in income of nearly £1M for 2024-25, around 10%.
For some unexplained reason, there is no anticipated increase for future years – that can’t be right.

The council accepts it may not use onstreet charges to raise revenue, but that is clearly the intention and purpose of these changes

The council is dissembling and making absurd and ridiculous claims to try and hide this reality.

The government has issued “guidance about the public’s right to challenge local authority parking policies”.

These plans and the consultation upon them are inconsistent with this guidance, and that below.

Plan for Drivers, p18: “the Right to Challenge guidance for local authority parking policies - This statutory guidance, first published in 2015, enables the public to challenge parking policies by petitions.”

Legal maxim: Look not at what they say, look at what they do and what it means.

The council is abusing its powers and acting unreasonably and unlawfully.

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THE EAST COULSDON RESIDENTS' ASSOCIATION



www.eastcoulsdon.co.uk

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Jayne Rusbatch
Head of Highways and Parking
3rd Floor, Zone C Bernard Weatherill House
London Borough Croydon
8 Mint Walk
Croydon, CR0 1EA

6th May 2024

Dear Jayne Rusbatch

Parking Charges Statutory Consultation 18th April 2024

Please find the East Coulsdon RA's response to the Parking Charges consultation. We welcome the adoption of our suggestion for district centres of 1-hour free parking and a second hour paid for at a sensible price. We also welcome that this will be standardised across the Borough. This should enable the district centres to remain viable against district centres in adjacent Boroughs.

We also note you intend to extend the controls to the currently 1-hour free and second hour no return to local area shopping parades such as the Tudor Parade and Lacey Green in Old Coulsdon along with Rickman Hill in Chipstead Valley Road and similar parades across the Borough which have never previously been metered or controlled in such a way as it is proposed. This will assist against those few who park for more than one hour. It may also have a detrimental impact on these local shops and economy. The Government guidelines on enforcement issued by the DfT require the local economy to be taken into consideration. www.gov.uk/government/publications/civil-enforcement-of-parking-contraventions/guidance-for-local-authorities-on-enforcing-parking-restrictions

However, we do feel that the need to use the parking app, phone RingGo or visit a Pay Point shop does take some time and can be inconvenient for very short-term parking. It is also detrimental and discriminatory against those who do not have or cannot use a mobile phone, particularly the elderly of which there is a large number in the local area.

We believe to cater for this that there should be a 15-minute grace period. This would also enable people who just want to drop off or pick up somebody or something from a local shop or business the ability to do so without risk of incurring a penalty charge. This is common practice in Supermarkets that allow 10-15 minutes grace to pick up or drop off or in some cases enter and leave the car park if there are no vacant spaces. Railway stations allow a 20-minute free period for dropping off and picking up people or for making and enquiry at the booking office. Again, the Government guide lines suggest at least 10 minutes.

Lion Green car park is essential to the Coulsdon town centre economy. It is important that there is an adequate mix of short-term and long-term bays. The existing free parking after 6.00pm and all day on Sundays are very important to the economy of Coulsdon and must remain. We would also expect the new parking rules to be administered firmly and fairly.

Yours Faithfully

Chair : East Coulsdon RA

Copy : Jason Peery Mayor, Cllr Scott, Roche, Coulsdon Town and Old Coulsdon Councillors and David Wakeling Croydon

8th May 2024

Jayne Rusbatch
Head of Highways and Parking
3rd Floor, Zone C Bernard Weatherill House
London Borough Croydon
8 Mint Walk
Croydon, CR0 1EA

Dear Ms Rusbatch,

Re: Parking Charges Statutory Consultation 18th April to 9th May2024

The proposed introduction of the RingGo parking scheme is discriminatory, particularly to older residents and those who do not have a mobile phone. I know of one elderly resident, who attended the 'consultation' with the very expensive consultants in Coulsdon Library. **(Why does Croydon keep employing very expensive consultants when the Council are bankrupt?)**

She told them she did not have a Smart phone or mobile phone – the reply was - 'she would have to get one'!!! Upon pointing out to one of the consultants, when I attended the following week, that many pensioners - and others, possibly disabled or for other reasons - could not afford to buy the very expensive phones, did not buy in to digital technology, nor understand or be able work or understand it, is time consuming and did not want to be forced to use digital or on-line systems. He agreed he would not be able to live on the small income which many pensioners and others have to exist upon. Age and disabled discrimination, I think.

Most nearby Boroughs have fairly liberal parking schemes in comparison to Croydon. More people will choose to shop in places which has convenient parking(often free parking) and not in Croydon, and, particularly of interest to the residents of Coulsdon. The latest scheme will make the comparison worse and not in Croydon's favour. Has Croydon noticed the reduction in uptake and in revenue from Lion Green Road car park since RingGo has been introduced there? It appears that Croydon is championing the decline, decay and failure of local shopping areas with the parking measures they have introduced and proposed to do. I am sure that RingGo is not monitoring parking in Croydon for nothing and I would be interested in the contract cost of the proposed scheme. Perhaps you would put this in as a Freedom of Information request?

Coulsdon Town currently has the straight forward, one-hour free parking meter controls in place by obtaining a free ticket from the meter. Within this consultation Croydon says they intend to extend the controls of the currently 1-hour free and have a second hour paid for in District Centres and this is something which East Coulsdon Residents' Association has been asking to be installed for years and I am pleased with this proposal. However, having to register with RingGo for the one hour free is overkill and there should be no need for such a system. The second hour charge could be facilitated by RingGo – for those who are happy to spend their time eaten up to register and give over all their personal details – many of whom object to personal details being a part of this system. Or, if convenient, a nearby shop to register. What happens when a person returns to their car and find that a penalty notice has been issued – either physically or later arrives in the post? Once again it is the resident whose time is eaten up with appeals – possible objection – and not to go to those particular shops again.

However, I also note that, in addition, Croydon proposes no return to local area shopping parades such as the Tudor Parade and Lacey Green in Old Coulsdon along with Rickman Hill in Chipstead Valley Road and similar parades across the Borough which have never previously been metered or controlled in such a way as is proposed. Whilst this may assist against those very few who park for more than one hour, it is also likely to have a detrimental impact on these local shops and economy.

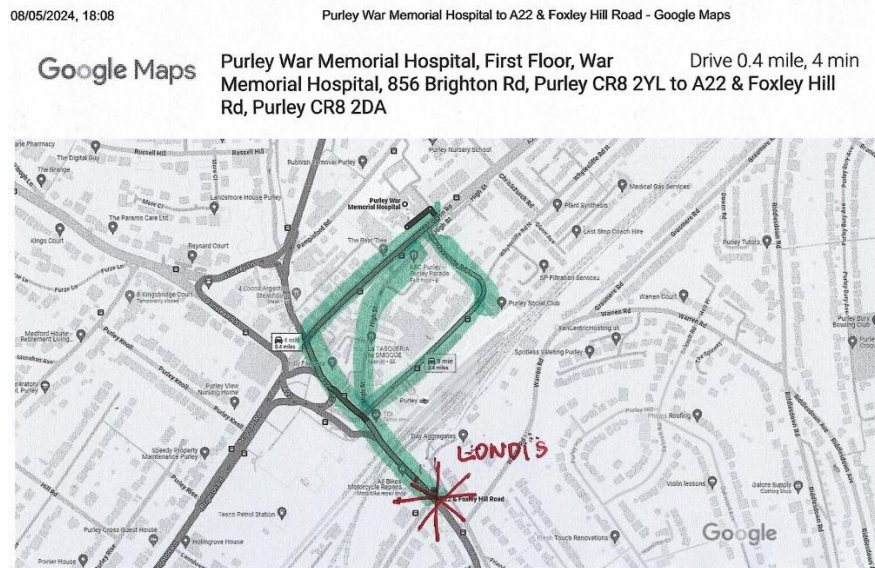
As we have now, belatedly, found out about these proposals for local parades from a question asked at a Councillors surgery at Tudor Parade Old Coulsdon, it is proposed to extend RingGo controls to Tudor Parade, I protest against such controls by RingGo monitoring. Such local parades have never had metered or paid for parking and is a parade of local little shops into which most people 'pop' in for 5 or 10 minutes to pick up a paper, bottle of milk, prescriptions, The Post Office etc. Some for coffee or hairdressers which may require a longer stay.

I understand that Croydon claims that the problem will be mitigated by visiting a Pay Pal shop - which I understand has been designated as The Village Stores on The Tudor Parade. Such a procedure would take some time and can be inconvenient for very short-term parking, maybe longer than the time would have been taken for the original reason for 'popping' into a shop. This is detrimental and discriminatory against those who do not have mobile phones, particularly the elderly of which there is a large number in the Old Coulsdon area. If you get a parking space the other end of The Parade from The Village Store it will be time consuming to get from one end of The Parade to the other and back and then visit the original shop.

In addition, The Village Stores on Tudor Parade were spoken to on this proposed procedure and they knew nothing of the scheme! Surely it would have been politic to inform the designated stores in these types of areas of what they are expected to do, which will put additional burden on their businesses? I anticipate that 'designated shops' who do have Pay Pal will very soon become exasperated with this scheme as their shops are filled with

non-paying customers from quick turn-around parking which is the norm in local shopping parades such as Tudor Parade. There is a possibility they would lose paying customers irritated by the longer wait to be served.

Are you aware of the pilot scheme that was set up in Purley? Within this pilot, the designated Pay Pal shop was at the Londis store in the petrol station in Godstone Road. Rather a long walk and time consuming. Map below of parking area for Purley and highlighting Londis.



Purley shopping area – designated PayPal shop Godstone Road

I am curious how RingGo will monitor all of these shopping areas. Will cameras be installed? Will large, ugly notices be installed such as those which are installed at airport drop off points? We have been told that it is too expensive /inefficient to send enforcement officers. – although enforcement officers will still be sent to enforce in the CPZ around Coulsdon and could easily attend shopping parades, taking down the numbers of the cars parked, before attending those CPZ areas and return after completion which would solve the problem of the very few long-term parkers.



Old Coulsdon, Bradmore green / grange park conservation area

If cameras and large notices are to be installed to facilitate RingGo monitoring I wonder if you are aware that The Tudor Parade/ Bradmore Green and Grange Park are in a designated conservation area and therefore cameras and large ugly notice should not legally be installed in and around the area. If cameras are not to be installed, I would be interested in how RingGo achieve their monitoring. Please enlighten me and residents.

I therefore ask that you re-consider installation of RingGo and such like parking controls within such local shopping areas such as The Tudor Parade, Lacey Green in Old Coulsdon along with Rickman Hill in Chipstead Valley Road and continue with the more sensible, but more frequent enforcement officers attending so that such parades are not devastated by over operational parking controls.

I send this letter in a personal capacity but will list the organisations I am involved in to show that I am personally committed to the Coulsdon area.

Yours sincerely,

Secretary of ECRA and Planning
Chair of Marlpit Lane Bowling Green
Coulsdon Town and Old Coulsdon Police Panels
Member of Old Coulsdon Patients Participation Group Committee
On Friends of Farthing Downs and Happy Valley Committee
NHS Calat Centre
NHS Forerunner Forum

Cc Chris Philp MP
Mayor Jason Perry
Councillor Lynne Hale
Councillor Jason Cummings
Councillor Scott Roche
Councillor Ian Parker
Councillor Margaret Bird
Councillor Mario Creatura
Councillor Luke Shortland
Councillor Nkhil Sherine Thampi
Coulsdon Residents Associations.