

**Officer Delegated Decision Report:** 13 July 2017

**Report title:** Proposed New Controlled Parking Zones - Vassall Area, Statutory Consultation Results, Implementation and Funding

**Wards:** Coldharbour and Vassall

**Report Authorised by:** Sue Foster, Strategic Director, Neighbourhoods and Growth

**Portfolio:** Councillor Jennifer Brathwaite: Cabinet Member for Housing and Environment

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### **Report summary**

This report presents the results of the Statutory Consultation carried out, between 22 March and 19 April 2017, within the Vassal area relating to the Council's proposals to introduce new Controlled Parking Zones (CPZs).

It seeks approval to make the Traffic Management Order (TMO) for the implementation of the following CPZ proposals (as shown in Appendix A as Drawing Nos. DES-CPZ-2000-002 Zone V, DES-CPZ-2000-003 Zone A Extension and DES-CPZ-2000-003 Zone B extension):

- introduce a new 'V' CPZ to be operational Monday to Friday between 8.30am and 6.30pm;
- extend the existing Camberwell 'A' CPZ operating Monday to Friday between 8.30am and 6.30pm;
- extend the existing Brixton 'B' CPZ operating Monday to Friday between 8.30am and 6.30pm;
- extend the existing Herne Hill 'N' CPZ boundary to include the remainder of Hinton Road operating Monday to Friday between 12pm and 2pm.
- implement the new CPZs based on a cashless payment system: Pay-by-Phone and Pay-Point with no on-street ticket machines. (To be reviewed one year post-implementation of the scheme).

It seeks authorisation to allocate Parking Reserves of £160,000k in order to carry out the implementation of controlled parking zones in the Vassall (£160k) area.

An overview plan and a list of road names for permit entitlement for each respective zone is shown in Appendix H of this report.

Proposals presented as part of the Statutory Consultation are shown in Appendix B (Drawing No DES-CPZ-2000-001-01 Rev A and DES-CPZ-2000-001-02 Rev A)

### **Finance summary**

The cost of implementing the proposed measures is estimated at £160,000. This includes the publication of the Traffic Management Orders, road markings and signage, traffic management, statutory consultation and staff costs. All implementation costs are from Parking Reserves.

Once operational, we will use our current establishment for both on-street and back office in order to provide our service to these new areas. This will be reviewed in the first quarter to ensure it is not jeopardising our ability to maintain the expected service levels. The service will however require 1.5 temporary Permissions

Officers for 3 months due to the initial increase in permit holder applications. This is likely to cost approximately £11,775 and will be funded from increased revenue from the permit sales in these new areas.

## **Recommendations**

- A. Consider the representations received in respect of the proposals as detailed in Appendices C - F.
- B. Consider the objections against the proposed measures and the arguments for their implementation as detailed in Appendices C - F.
- C. Agree to proceed with the making of the Traffic Management Order (TMO) for the implementation of the Controlled Parking Zone proposals as shown in Appendix A to:
  - implement a new 'V' CPZ to be operational Monday to Friday between 8.30am and 6.30pm;
  - extend the existing Camberwell 'A' CPZ operating Monday to Friday between 8.30am and 6.30pm;
  - extend the existing Brixton 'B' CPZ operating Monday to Friday between 8.30am and 5.30pm;
  - extend the existing Herne Hill 'N' CPZ boundary to include the remainder of Hinton Road operating Monday to Friday between 12pm and 2pm.
  - implement the new CPZs based on a cashless payment system: Pay-by-Phone and Pay-Point with no on-street ticket machines. (To be reviewed one year post-implementation of the scheme).
- D. To authorise and allocate Parking Reserves of £160k in order to carry out the implementation of controlled parking zones in the Vassall (£160k) area.

### **1. Context**

- 1.1 The council carried out a borough-wide Parking Feasibility Study associated with the review of the council's CPZs and non CPZ areas. As part of this work it became apparent that there are acute issues with parking in two particular areas of the borough being the uncontrolled Vassall and Brixton Hill areas.
- 1.2 The majority of the issues are created by the demand for parking by commuter vehicles during the daytime period, creating conflict with those who have a local demand for such parking (residents / visitors / businesses). The council receives regular correspondence from residents / businesses in these areas raising concerns about parking.
- 1.3 It was therefore decided to consult the uncontrolled Vassall and Brixton Hill areas in order to gauge the views of residents and businesses on the possible introduction of a CPZ. Non-statutory consultation and engagement carried out in 2016 was used to shape the proposal that on 16<sup>th</sup> March 2017 received Cabinet Member approval to proceed to statutory consultation. A separate report considers whether to proceed with a CPZ in the Brixton Hill area.

### **2. Proposal and Reasons**

- 2.1 A statutory consultation was carried out and included the erection of Notices on lamp columns in the area; the publication of the Council's intentions in the Local paper and the London Gazette. In addition, all properties within the consultation area were sent a newsletter setting out the proposals and explaining how representations could be made.

- 2.2 The key objectives of parking management include:
- Tackling congestion by reducing the level and impact of traffic in town centres and residential areas.
  - Making the borough's streets safer and more secure, particularly for pedestrians and other vulnerable road users through traffic management measures.
  - Improving the attractiveness and amenity of the borough's streets, particularly in town centres and residential areas.
  - Encouraging the use of more sustainable modes of transport.
  - Improving air quality.
- 2.3 Controlled parking zones aim to provide safe parking arrangements, whilst giving residents and businesses priority access to available kerbside parking space. It is a way of controlling the parking whilst improving and maintaining access and safety for all road users.
- 2.4 A CPZ comprises of yellow line waiting restrictions and various types of parking bays operational during the controlled times. These types of bays include the following:
- Resident Permit holder bays: - For use by resident permit holders and those with visitor permits.
  - Pay by Phone (PbP) shared use/permit holder bays: - For use by Pay by Phone (PbP) customers and resident and business permit holders.
  - Shared use/permit holder bays: - For use by resident and business permit holders.
  - Different combinations of parking bays can also be created e.g. Resident and Pay by Phone (PbP) customers only or Pay by Phone (PbP) only bays.
  - Other bays are also provided where necessary such as Disabled, Doctors, Police, Motorcycle, Loading, electric vehicle bays and car club bays.
- 2.5 A CPZ includes double yellow lines (no waiting 'At Any Time') restrictions at key locations such as at junctions, bends, cul de sacs and along certain lengths of roads where parking impedes the flow of traffic or would create an unacceptable safety risk.
- 2.6 Within any proposed CPZ or review, the Council aims to reach a balance between the needs of the residents, businesses, visitors and all other users of the highway. It is normal practice to introduce appropriate CPZ measures if and when there is a sufficient majority of support and / or there is an overriding need to satisfy some of the key objectives associated with parking management.
- 2.7 Informal Consultation
- The informal consultation for the proposals to introduce parking controls in the Vassall Area commenced on 22 September 2016 and ended on 20 October 2016. 8910 premises were consulted with documents containing a newsletter explaining the proposals, describing the reasons for the consultation, how a CPZ works and how to participate in the consultation. A Frequently Asked Questions (FAQs) document was also provided to answer common CPZ related questions and Lambeth's Permit Pricing Structure information showing the cost of the various parking permits at the time of the consultation.
- 2.8 A webpage was also created which contained all the relevant information with detailed plans of the Council's proposals. On these webpages are links to a survey where households could complete and submit their views including comments. This was the primary method of participation in the consultation.
- 2.9 For those properties who were unable to access the information on the website, or complete the online survey, a telephone request line was created where respondents could request maps and hardcopy questionnaires. The details of this telephone request line was in the Newsletter sent out to all properties.

- 2.10 A3 posters were erected on lamp columns in and around the Housing Estates to raise awareness of the consultation. The poster contained a short link to the council website for detailed information and the telephone request line number.
- 2.11 A public exhibition was also held on 8<sup>th</sup> October 2016 at the Minet Library on Knatchbull Road from 10am to 4pm allowing residents and businesses to discuss the proposed measures with officers.
- 2.12 A large proportion of the roads in the area have been identified as being in a situation where parking demand exceeds capacity, which can often lead to unsafe parking practices. A full study, available on the Council webpage [www.lambeth.gov.uk/vcpz](http://www.lambeth.gov.uk/vcpz), was undertaken by JMP Consultants on behalf of Lambeth Council to assess parking conditions in the area.
- 2.13 Statutory Consultation  
A statutory consultation was carried out between 22 March and 19 April 2017, which included the erection of Notices on lamp columns in the area; the publication of Council's intentions in the Local paper and the London Gazette. A copy of the proposed TMO, complete breakdown of the results, detailed plans of the proposals and the Council's Statement of Reasons were available for inspection at Brixton Library. The documents were available on the council website and a newsletter was distributed to all (8910) properties in the consultation area. The newsletter detailed the results of the informal consultation, the decision taken to proceed and the undertaking of the statutory consultation process on the proposed parking controls. An email address was provided for residents and businesses to make their representation for or against the scheme.
- 2.14 Due to postal issues newsletters were delivered a week later than expected, therefore the consultation was extended by one week. This was explained on the council website.
- 2.15 Proposed Zone 'V' Statutory Consultation Results  
The statutory consultation resulted in a total of 86 representations, 55 of which are in support of the proposals, 21 against the proposals and 10 comments. These representations are detailed in Appendix B.
- 2.16 Included in this were two representations received from Camberwell Bus Garages which are located in LB Southwark.
- 2.17 The main objections and comments received from residents and businesses in the area include:
- 11 respondents prefer a 2 hour zone
  - 10 respondents considered the informal consultation response rate too low to justify progressing with the proposals
  - 4 respondents prefer the hours of operation to be hours to be 8.30am - 5.30pm
  - 3 respondents prefer shorter hours in general
  - 2 respondents consider there are no parking problems
  - 2 respondents consider that the CPZ will reduce parking for residents
  - 2 respondents consider the permit prices are too high
- 2.18 A petition (PT17-Vassall 001) against CPZ inclusion was received with a total of 60 names from Patmos Road, Elliot Road, Frederick Crescent, Myatt Road, Tindal Street, Cancell Road, Lothian Road and Langton Road. Responses to representations received from this petition are shown in Appendix C.
- 2.19 Many of the names on the petition are from the same households and a number of names appear to be from staff of the Akerman Medical Practice and Health Centre, who would be classified under the CPZ as commuters to their place of work. Any carers of the medical centre who meet the specific

requirements will be able to purchase a Health Care Permit allowing them to use their vehicle for visiting patients within any CPZ in the borough.

#### 2.20 Zone 'V' Design Amendments

Following the Statutory Consultation, officers have made amendments to the design based on comments received from either residents, businesses or Ward Councillors.

- The introduction of one hour free bays adjacent to the medical centre on Vassall Road to provide a facility for visitors to the Medical Centre.
- The introduction of one hour free bays outside the People's Kitchen on Cormont Road to provide a facility for visitors to this establishment and the Myatt's Field Park.
- The introduction of one hour free bays on Tindal Street near the junction of Patmos Road to provide a facility for visitors to the Medical Centre.

#### 2.21 Alternatives considered

##### **Exclude Roads - Petition (PT17-Vassall 001)**

Consider residents' continued opposition to parking controls and exclude Patmos Road, Elliot Road, Frederick Crescent, Myatt Road, Tindal Street, Cancell Road, Lothian Road and Langton Road. However, should these roads be excluded they would be adversely affected by displacement from commuters and nearby residents avoiding charges in the new CPZ. Due to this displacement, if residents are unable to find a parking space they either need to pay to park (which has a four hour maximum stay) in the nearby surrounding CPZ roads or effectively the closest free parking available to these residents will be south of the south circular, which is approximately 3 miles away. All existing surrounding zones operate at either Monday-Friday or Monday-Saturday from 8.30am-5.30pm or 8.30am-6.30pm.

- 2.22 In the event that residents request the Council to re-consult the area due to the inevitable parking displacement, it is unlikely that the Council would be able to revisit the area again in the short – medium term as funding and resources will need to be identified and allocated. This potentially would leave residents with parking difficulties for some time. Therefore it is considered that in the absence of strong objections from the residents that they are included within the proposed zone.

#### 2.23 Proposed Zone 'A' extension Statutory Consultation Results

The statutory consultation resulted in a total of 10 representations, two of which are in support of the proposals, five against the proposals and three comments. These representations are detailed in Appendix D.

The main objections and comments received from residents and businesses in the area include:

- Four respondents asked if they can park in a road not in our zone
- Three respondents consider the response rate for the informal consultation was too low
- Two respondents prefer two hour zone
- One respondent prefers shorter hours in general

#### 2.24 Zone 'A' extension Design Amendments

Following the Statutory Consultation, officers have made amendments to the design from comments received from either residents, businesses or Ward Councillors.

- The reduction of a resident bay and extension of double yellow lines to facilitate a dropped kerb on Gordon Grove near its junction with Flaxman Road.

## 2.25 Proposed Zone 'B' extension Statutory Consultation Results

The statutory consultation resulted in a total of 16 representations, 10 of which are in support of the proposals and six against the proposals. These representations are detailed in Appendix E.

The main objections and comments received from residents and businesses in the area include:

- Three respondents consider the permit prices are too high
- Two respondents state that the Informal consultation results show they are not in favour of CPZ
- One respondent considered the response rate for the informal consultation was too low
- One respondent prefers two hour zone

## 2.26 No design amendments have been made for the Zone 'B' extension

## 2.27 Proposed Zone 'N' boundary extension Statutory Consultation Results

The statutory consultation resulted in a total of one representation showing support of the proposals, detailed in Appendix F.

## 2.28 Representation received by Met Police for entire consultation area

"I do have comments however this is not an objection only a concern. I recognise that Lambeth wish to make the borough safer and reduce traffic congestion along with improving the quality of life for residents however, with the introduction of a borough wide 20 MPH limit, parked vehicles are known to have a traffic calming impact and consequently contribute in speed reduction. I do not foresee public transport issues here as the area is not close to a railway station."

## 2.29 Ward Councillor comments

All Ward Members were contacted prior to and after the consultation.

### Vassall Ward

Cllr Paul Gadsby: *"I am content with the progression of this project and do recommend these proposals are implemented, especially with the adaptations made by the project team in Vassall following consultation with residents, ward councillors and local health centres"*.

*"However, I do have some concerns about the removal of pay and display machines which are cash based. While I accept there are strong arguments for phasing them out and there are alternative methods of payment, there are a number of residents in my ward, particularly older residents, who don't use bank cards and may find the alternatives prohibitive. I would prefer that we reviewed this arrangement after six months rather than the twelve months so that we can assess the impact more quickly. I would also recommend that when communications are sent out announcing the setting up of the CPZ, the pay and display system is given prominence with clear instructions of why it is being introduced and how residents can pay via alternatives"*.

Cllr Annie Gallop: *"I am confident that the benefits of this CPZ will result in prioritising the majority of residents parking needs. These spaces (in Vassall Ward especially) are the last in zone 2 to be a parking free-for-all to the detriment of our communities because external commuters arrive in the morning to park to get the tube or bus and don't free up the space until early evening. Concerns are understandable but once the scheme is in place I am sure they will ease"*.

### Coldharbour Ward

Cllr Matt Parr: *"As far as the changes to parking controls in Coldharbour Ward are concerned I am confident that they will answer the needs of many residents who have found it impossible to park near their own homes. Experience has shown that leaving pockets of free parking does not work, and extending the CPZ will improve matters significantly"*.

## 2.30 Permit Criteria

There are a number of different parking permits available depending on personal circumstances. E.g. Vehicle type; resident; business or blue badge holder. See Appendix G for Lambeth's permit pricing structure.

2.31 Pay by Phone/PayPoint Tariff:

It is recommended that the charge for parking within the pay by phone shared use/permit holder bays reflect the standard charges applied to these types of bays in the borough, at the time of consultation. The cost will be £3 per hour, with a maximum stay of four hours (price subject to change).

2.32 Cashless Parking Pilot Scheme

Lambeth Parking Services are undertaking a pilot scheme to decommission, disconnect and completely remove parking Pay-and-Display (P&D) ticket machines throughout the borough over a two year period. It will ultimately support long term cost savings by reducing contract and maintenance costs, as well as staff hours required to process aspects of this function, i.e. general maintenance, refunds, reconciliation, contract management.

As part of the pilot study, it is also proposed to introduce these new CPZs without any P&D ticket machines, as per the report recommendation.

2.33 The alternatives to Pay & Display Ticket Machines:

Pay by Phone (PbP), the council's cashless parking solution which allows citizens to park by completing a transaction over the phone, via a mobile application or online using the web, currently accounts for 70% (around 65,000) of all short term parking transactions carried out in the borough.

PayPoint is a card & cash based payment system being considered as an additional alternative to P&D ticket machines as it is easily accessible and widely available throughout the borough at participating shops.

2.34 Benefits of using the Pay by Phone (PbP) solutions

This proposal directly demonstrates Lambeth's ambitions to deliver our residents priorities by being a greener, cleaner and safer borough through:

- Reduction of Carbon Dioxide (CO<sub>2</sub>), Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter emissions as large vans are used to collect cash from machines, as well as transport spare parts and engineers to machines and locations where maintenance and repairs are needed. There are currently also three Lambeth employed technicians who drive around the borough on a daily basis to clean and repair machines.
- De-cluttering of streetscapes by removing unsightly machines and any graffiti or vandalism that is generally associated with these machines.
- Removing opportunities for criminal activity as there are organised crime groups who commit theft from machines across many London boroughs, including Lambeth who use special equipment/machinery to break into the machines. There is also a substantial level of casual theft from machines that is committed by persons acting on their own – generally through tampering with the coin slots.
- Clearing away potential health and safety risks as some older machines have weathered and may have rusty pedestals or exposed wires due to being subjected to the elements for many years – some machines are around 15 years old.
- There is no impact on PbP service delivery should there be a decision to change the format of any currency, i.e. any coins that are currently in circulation. As transactions are electronic, there is no requirement to reconfigure the service.
- Ability for drivers to extend parking stay without returning to the vehicle, potentially reducing the risk of a PCN.

- No issues with overpayment due to not having the correct change.
- Pay-by-phone is a scheme that operates nationally and users only need to register once.

### 3. Finance

3.1 The cost of implementing the Controlled Parking Zones including the making of TMOs and officers' staff costs is forecast to be £160,000. This is funded from a budget of £300,000 that has been allocated from Parking Reserves.

3.2 The first-year annual revenue costs and income forecast arising from the new CPZ is forecast to be:

	INCOME	EXPENDITURE
Permissions Officers (1.5 FTE) 3 months		£11,775
Permit Sales	£119,700	
Enforcement (PCN Revenue)	£72,450	
Paid for Parking Sales	£112,850	
<b>TOTAL</b>	<b>£305,000</b>	<b>£11,775</b>

3.3 The forecast income and expenditure detailed in para 3.2 were incorporated into the 2017/18 Budget and no adjustments will be required to either if the CPZ becomes operational in September. If the CPZ is not introduced or is introduced later then there will be a proportional reduction in the net income for the Council.

### 4. Legal and Democracy

4.1 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.

4.2 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.

4.3 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.



- 4.4 A 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.
- 4.5 Once the abovementioned Order(s) is/(are) in place, the council is required to make the necessary amendments to the road markings and signage as soon as practicable to adequately provide information as to the Order that is in place in that area. The requisite sign or signs for these purposes is specified in the Traffic Signs Regulations and General Directions 2016 (TSRGD).
- 4.6 The history and outcome of non-statutory stakeholder consultation undertaken to date is detailed at paragraphs 2.7 and 5 of this report. The following principles of consultation were set out in a recent High Court case: First, a consultation had to be at a time when proposals were still at a formative stage. Second, the proposer had to give accurate and sufficient reasons for any proposal to permit of intelligent consideration and meaningful response. Third, adequate time had to be given for consideration and response, and finally, the product of consultation had to be considered with a receptive mind and conscientiously taken into account in finalising any statutory proposals. The process of consultation had to be effective and looked at as a whole it had to be fair. Fairness might require consultation not only upon the preferred option, but also upon discarded options. The proposals detailed in this report require the making of a TMO. The statutory procedure to be followed in this connection is detailed above and includes a statutory consultation stage. The Council is obliged to take account of any representations made at that stage and any material objections received will need to be reported back to the decision maker before an Order is made. All representations received must be properly considered in the light of administrative law principles, Human Rights law and the relevant statutory principles. The 1996 Regulations provides for the holding of a public inquiry in connection with a decision to approve, modify or abandon a TMO. The purpose of such an inquiry would be for the proposal to be examined and for the public to be given the opportunity to make their views known in a public forum. The Council is only obliged to hold a public inquiry if the proposal relates to the prohibition of loading and unloading of vehicles of any class in a road on any day of the week (i) at all times, (ii) before 0700, (iii) between 1000 and 1600 hours, or (iv) after 1900 hours and an objection has been made to the proposed order; or the order relates to the prohibition or restriction of passage of public service vehicles. In all other cases, the decision maker may determine at his discretion whether or not to hold a public inquiry before making an order.
- 4.7 Section 149 of the Equality Act 2010 sets out the new public sector equality duty replacing the previous duties in relation to race, sex and disability and extending the duty to all the protected characteristics i.e. race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment. The public sector equality duty requires public authorities to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation
  - Advance equality of opportunity and
  - Foster good relations between those who share a protected characteristic and those who do not.
- 4.8 Part of the duty to have “due regard” where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.
- 4.9 The Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

4.10 In addition to the above, Section 175A of the Highways Act 1980 extends a specific duty upon local authorities to have regard to the needs of disabled and blind in the execution of certain street works (namely the placing of lamp-posts, bollards, traffic signs, apparatus or other permanent obstructions) which may impede such persons.

4.11 The Council's constitution delegates to Directors and Assistant Directors (Delivery) the authority to consider objections received from statutory consultation as part of the TMO making process, (subject to a formal report setting out the objections, with clear recommendations, being submitted for approval) and the power to make, amend or revoke traffic orders, following the consideration of such objections.

4.12 The Council's Constitution requires that all key decisions, decisions which involve resources between the sums of £100,000 and £500,000, and important or sensitive issues, must be published on the website for five clear days before the decision is approved by the Director or Cabinet Member concerned. Any representations received during this period must be considered by the decision-maker before the decision is taken.

## **5. Consultation and co-production**

5.1 A statutory consultation ran from 22 March to 19 April 2017. Refer to section 2.7 and 2.13 of this report for details on the informal and statutory consultations, along with relevant appendices.

## **6. Risk management**

6.1 The risk of not introducing the proposed parking arrangements is that the existing parking difficulties would continue and it would do nothing to address obstructive parking and the high levels of commuter vehicles driving through and parking in these parts of the borough.

6.2 There are potential risks relating to the public consultation demonstrating limited appetite for new parking controls within the affected areas. As with all public consultations, the council will need to carefully consider the nature of any objections in order to determine the most appropriate way forward.

## **7. Equalities impact assessment**

7.1 The Project Manager has screened the scheme's likely effect on people who have one or more of the protected characteristics (race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment). The screening looked at how the scheme might:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity and
- Foster good relations between those who share a protected characteristic and those who do not.

7.2 Two of the protected characteristics, age and disability, have been identified as being disproportionately affected by the scheme. Part of the duty to have "due regard" where there is disproportionate impact will be to take steps to mitigate the impact and the Council must demonstrate that this has been done, and/or justify the decision, on the basis that it is a proportionate means of achieving a legitimate aim. Accordingly, there is an expectation that a decision maker will explore other means which have less of a disproportionate impact.

7.3 The proposals to not include ticket machines will result in a primary reliance on pay-by-phone, with an alternative option of using pay-point in certain local shops in the area. This could increase walking / travel distances for drivers who need to purchase a ticket that do not have access to Pay-by-Phone. The council has committed to review the approach taken to new ticket machines within

one year of the scheme being implemented in order to further assess the equalities impact of the scheme.

- 7.4 Drivers who display a valid disabled badge will be permitted to park in all permit bays and shared bays in the new CPZ areas.
- 7.5 Bodies representing motorists, including commuters are included in the statutory consultation required for draft traffic management and similar orders.
- 7.6 The implementation of waiting restrictions affects all sections of the community especially the young and the elderly and assists in improving safety for all road users as well as achieving the transport planning policies of the government, the Mayor for London and the borough.
- 7.7 Maintaining clear access points and visibility will thereby improve the safety at junctions; bends and along narrow sections of a road, subsequently reducing potential accidents.

**8. Community safety**

- 8.1 All road space in a CPZ is managed by the introduction of parking controls. Parking is only permitted where safety, access and sight lines are not compromised. It is, therefore, normal practice to introduce double yellow lines at key locations such as at junctions, bends, turning heads and at specific locations along lengths of roads where parking would impede the passing of vehicles. It is also necessary to provide yellow line waiting restrictions (effective during the CPZ hours of operation or at any time) where the kerb is lowered, i.e. at crossovers for driveways. The key objective of managing parking is to reduce and control non-essential parking and assist the residents, short-term visitors and the local businesses.
- 8.2 Introducing CPZs also results in uniformed enforcement officers walking the streets in the area, thereby increasing natural surveillance.

**9. Organisational implications**

**9.1 Environmental**

The introduction of new CPZs has a direct link to initiatives within the council’s draft Air Quality Action Plan. There may be some minor measurable benefits over time associated with the proposals, particularly as the number of commuter vehicles travelling to these areas of the borough will reduce. A proportion of these drivers are likely to consider alternative forms of sustainable transport for their journey to and from work.

**9.2 Staffing and accommodation**

9.2.1 Implementation of the recommendations of this report require 3.0FTE (pro-rata until September 2017). One key post becomes vacant on 2 June 2017 and it is key to the success of this project that resources are secured to backfill this vacancy.

9.2.2 Operating a CPZ requires trained staff to perform the functions that are a pre-requisite of enforcement. The recommendations will extend the area covered by controlled parking and while this is a large increase, we aim to accommodate this extra area with our existing establishment. The table below set out the resourcing requirements, however the only extra resource required to ensure this scheme is a success it will be 1.5 temporary officers to administer the expected influx of Parking Permit Applications for a period of 3 months.

Service	FTE	Grade	Procurement
Permissions Officer	1.5	Sc5	Create new 3 month temporary posts and recruit

CPZ Infrastructure Officer		SO2	Absorb service requirement within existing establishment, review after 12 months
Civil Enforcement Officer		n/a	Extend scope of existing parking services contract with APCOA – Intention is to use existing deployment plan and review after 3 months.

9.2.3 A staffing review will take place 6 months after implementation to assess the resource requirements for enforcement and back office processing.

### 9.3 Procurement

9.3.1 The implementation stage of the CPZ project will be undertaken by the council's term contractor FM Conway or Colas (CVU) via the London Highways Alliance Contract (LoHAC).

9.3.2 Enforcement of the CPZ will be carried out under an extension with the Council's existing Parking Services Contract with Apcoa.

## 9 **Timetable**

If a decision is made to proceed with the implementation of the proposed CPZ, Traffic Management Orders could be made within six weeks. This will include the erection of the Notices on lamp columns in the area, the publication of the made Orders in the Local paper and the London Gazette. The documents will also be available at the Brixton Library and on the council website. A newsletter will be distributed to all the premises within the consulted area informing them of the decision.

Description	Date
Implementation	July / August 2017
Zone Operational	September / October 2017

<b>Consultation</b>				
<b>Name/Position</b>	<b>Lambeth directorate/department or partner</b>	<b>Date Sent</b>	<b>Date Received</b>	<b>Comments in para:</b>
Sue Foster Strategic Director	Neighbourhoods and Growth	29.06.17	03.07.17	cleared-
Andrew Burton	Highways, Enforcement & Capital Programmes	18.05.17	19.05.17	Various
Dave Goldring	Finance	19.05.17	27.06.17	3, 9.2
Ian Speed	Finance	19.05.17	21.06.17	3
Jean-Marc Moocarme	Legal	18.05.17	25.06.17	-
Maria Burton	Democratic Services	18.05.17	23.05.17	4
Councillor Jennifer Brathwaite	Cabinet Member for Environment & Transport	-	24.05.17	-
Raj Mistry	Assistant Director, Neighbourhoods	18.05.17	26.06.17	-
Johnathan Pook	Parking Services	19.05.17	12.06.17	3, 9.2
Councillor Donatus Anyanwu	Ward Councillor, Coldharbour	18.05.17	-	-
Councillor Rachel Heywood	Ward Councillor, Coldharbour	18.05.17	-	-
Councillor Matt Parr	Ward Councillor, Coldharbour	18.05.17	26.05.17	2.29
Councillor Jacqui Dyer	Ward Councillor, Vassall	18.05.17	-	-
Councillor Paul Gadsby	Ward Councillor, Vassall	18.05.17	25.05.17	2.29
Councillor Annie Gallop	Ward Councillor, Vassall	18.05.17	25.05.17	2.29

**Report history**

<b>Original discussion with Cabinet Member</b>	April 2016
<b>Part II Exempt from Disclosure/confidential accompanying report?</b>	No
<b>Key decision report</b>	No
<b>Date first appeared on forward plan</b>	N/A
<b>Key decision reasons</b>	N/A
<b>Background information</b>	<p><u>JMP – Lambeth Parking Surveys, Vassall Area</u>  The report details findings of the parking stress survey undertaken by JMP consultants on behalf of Lambeth Council. The report can found on the council webpage, <a href="http://www.lambeth.gov.uk/vcpz">www.lambeth.gov.uk/vcpz</a>  Road Traffic Management Act 1984</p>
<b>Appendices</b>	<p>Appendix A: Final Implementation Drawings  Appendix B: Original Proposal Drawings  Appendix C: Representations and Officers' comments for Vassall Zone 'V'.  Appendix D: Representations and Officers' comments for Camberwell Zone 'A' extension.  Appendix E: Representations and Officers' comments for Brixton Zone 'B' extension.  Appendix F: Representations for Herne Hill Zone 'N' extension.  Appendix G: Parking permit price pan.  Appendix H: Overview plan and road names for permit entitlement.</p>

**APPROVAL BY OFFICER OR CABINET MEMBER IN ACCORDANCE WITH SCHEME OF DELEGATION**

**I confirm I have consulted Finance, Legal, Democratic Services and the Procurement Board and taken account of their advice and comments in completing the report for approval:**

**Signature:** 

**Date:** 13 July 2017

**Post:** Brett Cockin  
Senior Parking Engineer - Neighbourhoods

**I approve the above recommendations:**

**Signature:** 

**Date:** 13 July 2017

**Post:** Sue Foster  
Strategic Director, Neighbourhoods & Growth

**Any declarations of interest (or exemptions granted):**

**Any conflicts of interest:**

**Any dispensations:**