
LEWISHAM COUNCIL PARKING ANNUAL REPORT 2020-21



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FOREWORD

As we reflect on the past financial year, it is staggering to think about how widely the Council has been affected by the pandemic, with services adapting virtually overnight to respond to emerging issues.

The Parking department was not immune to this and, between 2020-21, it adapted services to meet the immediate needs of our community, including:

- suspending parking enforcement between April and June 2020;
- the redeployment of Civil Enforcement Officers (CEOs) to assist other key services within the borough; and
- the Key Worker Permit scheme, which enabled key workers to park free of charge throughout the borough as they helped with the fight against COVID-19.

As well as changing services to respond to the impacts of COVID-19, Parking policies have been reviewed to consider how they can complement other corporate policies and help the Council to meet the objective of being carbon neutral by 2030.

We recognise that parking is an emotive subject and that the services provided affect residents, businesses, and visitors to the borough. It is key to strike the right balance for all road users, including motorists and pedestrians, and the parking department welcomes feedback so that it may continue to improve its services.

I believe that parking enforcement is a key tool in reducing carbon emissions, for example through emissions-based parking charges which incentivise low emission vehicles and encourage residents to walk or cycle where possible, or tackling engine idling and its resultant pollution.

This Parking Annual Report 2020-21 outlines the provision of services, informs of any improvements that have been made to the service, and provides information regarding the parking services' finances and the parking contractor's performance.

The parking department aims to provide a valuable service that meets the demand of parking throughout the borough, and this report highlights vital services and the financial activity of the parking department, in line with reporting requirements in the Traffic Management Act (2004).

I hope that this report provides you with an informative review of the development of the parking services in 2020-21.

INTRODUCTION

- 1.1. Lewisham Council, like most local authorities in London, levies a charge for a permit to park in areas of the borough that have been designated Controlled Parking Zones (CPZs). These CPZs are a function of transport policy and are used to:
 - ensure safe and sustainable access;
 - achieve effective parking management;
 - balance the needs of all road users;
 - meet environmental objectives; and
 - focus on customer needs.
- 1.2. The Council's parking policy must balance the needs of those living, working, visiting and trading in the borough, as well as ensure that the cost of parking controls is met. Complicating matters further is the significant demand for parking spaces, along with the need to reduce harmful effects of car use on the environment. The Council's parking charges reflect the need to not only cover the costs of delivering parking controls, but also manage these issues.
- 1.3. Parking charges are fixed in accordance with the requirements of the Road Traffic Regulation Act (1984). Section 122 of the Act imposes a duty on the Council when exercising its functions under the Act, to do so far as practicable, having regard to matters set out in Section 122 (2) of the Act 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'.
- 1.4. Setting appropriate charges ensures that the borough does not become a 'car park' for those travelling into London from the South East. It also ensures that the Council continues to meet the objectives set out above and complies with the requirements of Section 122 of the Road Traffic Regulation Act (1984).
- 1.5. The Council's fear of becoming a 'car park' for commuters remains valid. The introduction of the Congestion Charge in 2003 saw the number of commuters driving into Central London reduce, but the risk was, and remains, that they park in car parks in the surrounding areas. The borough has multiple transport links into Central London, which makes it a very real risk. This is especially the case as Lewisham is located in Zone 2 and at the end of the Docklands Light Railway (DLR). Added to this, access to Lewisham and its car parks is relatively easy for commuters driving into London, but access to parking locations becomes more difficult the further into London they travel.
- 1.6. The expansion of the Ultra Low Emission Zone (ULEZ) in October 2021 carries a similar risk, as those not wishing to upgrade their vehicles to meet the proposed standards may park just outside the zone boundary (i.e. the South Circular) and commute further into London using public transport. The extent to which this is likely to be a problem is currently being assessed in conjunction with TfL.
- 1.7. Using its powers outlined in the Road Traffic Regulation Act (1984), the Council has implemented a range of CPZs where parking pressures were evident, and where a clear majority of stakeholders were in favour of parking controls.

- 1.8. In line with the policy review recommendations, the Council updated its parking policy in 2019-20, and published the update (dated 15th January 2020), which is now available on the Lewisham Council website.

POLICY CONTEXT

- 2.1. There are a number of policies, both national and local, that contribute to this parking annual report for 2020-21.

National Context

- 2.2. The key legal frameworks underpinning parking include the Road Traffic Regulation Act (1984) and the Traffic Management Act (2004). These Acts impose duties on local authorities to manage all on-street and off-street parking, as well as their road network, to reduce congestion and disruption, including enforcement powers.
- 2.3. There is other London-specific legislation under the various London Local Authorities Acts which is also relevant for parking.

Local Context

- 2.4. Each London borough is required by the Greater London Authority (GLA) to prepare a Local Implementation Plan (LIP) to show how they are implementing the Mayor of London's Transport Strategy within their area.
- 2.5. [Lewisham's Transport Strategy and LIP \(2019-41\)](#) takes the Mayor of London's Transport Strategy, and tailors it to the context of Lewisham, shaped by the vision outlined in the borough's Sustainable Community Strategy and the spatial planning policies in the Local Development Framework.
- 2.6. Following a comprehensive Parking Policy review in 2012-13, the London Borough of Lewisham published its Parking Policy in 2014. This has since been updated. The Parking Policy Update was agreed at a Mayor and Cabinet meeting on 15th January 2020 and implemented in April 2020.

OVERVIEW OF PARKING IN THE BOROUGH

- 3.1. There are a variety of parking places across the borough, including 1,371 parking spaces in the Council's 12 off-street public car parks, and an estimated 20,000 parking spaces in marked on-street parking bays.
- 3.2. There are various parking restrictions, including yellow lines, restricted parking zones and Controlled Parking Zones (CPZs) which rely on an online permit system. The total number of CPZs operating in the borough at the end of 2020-21 was 22.
- 3.3. The Council has introduced a number of policies in recent years to support a reduction in car ownership and the use of sustainable modes of transport, including car clubs.
- 3.4. Electric Vehicle Charging Points (ECVPs) are a key measure to support the Council's Air Quality Action Plan. By the end of 2020-21, there were 102 EVCPs in 65 locations, including 27 charging points installed in 8 Council-managed car parks. Further EVCPs and sites have been identified and are now being installed as part of a new Low Emission Vehicle Charging Strategy, consulted upon in 2018-19 and subsequently adopted.
- 3.5. Several new schemes were introduced in 2020-21, which will be discussed in the Section titled, "Parking Developments (2020-21)".

PARKING ENFORCEMENT ACTIVITIES

- 4.1. The following section addresses the activities and performance of the parking contractor NSL Ltd. In January 2019, the Mayor and Cabinet agreed to extend NSL Ltd.'s contract with Lewisham Council for a further 4 years, until 30th April 2023.

Penalty Charge Notices (PCNs)

- 4.2. The total number of Penalty Charge Notices (PCNs) issued by Lewisham Council in 2020-21 was 59% higher than 2019-20.
- 4.3. Parking contraventions decreased between 2019-20 and 2020-21. This could be attributed to the suspension of parking enforcement, which is discussed in more detail in Section 7. Parking enforcement resumed in June 2020.
- 4.4. However, moving traffic contraventions increased significantly between 2019-2020 and 2020-21. This could be attributed to the implementation of the Lee Green Low Traffic Neighbourhood (LTN), which went live in August 2020. The Council's aim was, and is, to create safer, healthier streets during the pandemic, and to encourage compliance through the issuing of these PCNs. The parking department expects to see a decrease in moving traffic contravention PCNs in 2021-22.

Lewisham PCNs	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Parking Contraventions	36,195	47,313	52,213*	53,756	65,837	52,933
Moving Traffic Contraventions	20,869	23,156	23,259**	27,687	36,445	109,658
Total PCNs issued	57,064	70,469	75,472	81,443	102,282	162,599

Data based on 1st April 2020 – 31st March 2021

**SIDEM "Case Summary by Contravention Details", filtered to TMA CCTV and TMA HH.*

***SIDEM "Case Summary by Contravention Details", filtered to RTA CCTV Moving RTA and Bus Lane*

- 4.5. There are two Enforcement Agencies, Task and Newlyn, that recover debt for Penalty Charge Notices (PCNs) on behalf of the Council. Debt recovery was suspended in April, May and June 2020, and enforcement resumed in July 2020.
- 4.6. From July 2020 to March 2021, 12,977 warrants for PCN cases were passed to Task and 9,215 were passed to Newlyn. This is a total of 22,192 warrants for PCN cases issued to Enforcement Agencies in the 2020-21 financial year.

Parking Permits

- 4.7. The total number of Resident and Business Permits purchased in 2020-21 was 26,778. This is 56% higher than 2019-20. The steep rise in Business Permits in particular, as seen below, is due to the issuing of Key Worker Permits. Between 1st April 2020 and 31st March 2021, 5494 Key Worker Permits were issued. More information about the scheme as a response to COVID-19 can be found in Section 8 (COVID-19 Response).
- 4.8. The purchase of Visitor Permits decreased by 64% in 2020-21.

Permits	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Resident*	12,921	14,116	15,793	15,999*	15,499	19,748
Business**	522	544	1,759	1,923**	1,615	7,030
Visitor***	66,628	80,542	89,439	125,925***	126,713	45,816
Total	80,071	95,202	106,991	143,821	143,827	72,594

Data based from Farthestgate Operational "Monthly Permits" report

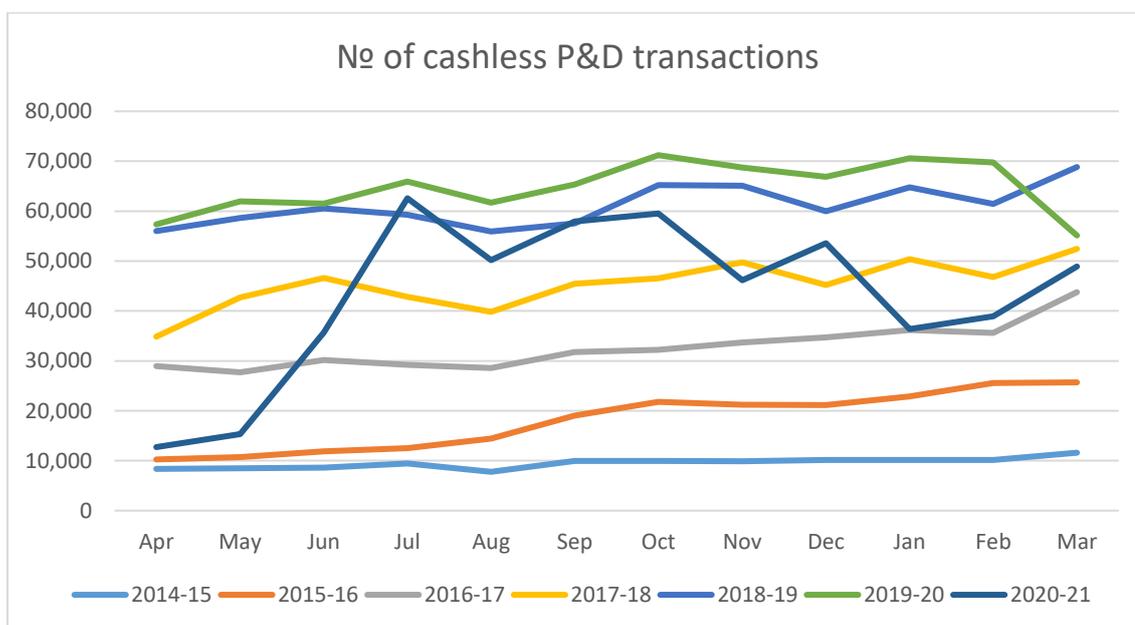
*Resident, Resident Disabled, Resident Health, Resident Low Emission

**Business, Business Health, Business Z, Car Club, Charity Business, Councillor, Hospital Staff, Market Trader, Key Worker

***Resident Visitor (1/5 hour, 1/7 day) and Scratch card (1/5/10 hour and 1/7 day)

Pay & Display and Cashless

- 4.9. From August 2015, the Council introduced a cashless parking system across the borough, which allowed users to pay for their parking on their Smartphone via the RingGo app (cashless Pay & Display subcontractor).
- 4.10. In August 2020, the Council moved from RingGo systems to the subcontractor PayByPhone, who now provide cashless parking across the borough. This cashless system currently operates alongside Pay & Display machines for short-stay parking.
- 4.11. The growth in cashless transactions continued from 2014-15 to 2019-20, as seen in the graph below:



- 4.12. The full nationwide lockdown commenced at the end of March 2020, and the country began opening up in June 2020, with a fuller return to open businesses in July 2020.
- 4.13. There was a large drop in the number of cashless Pay & Display transactions at the height of lockdown in the London Borough of Lewisham, with just 12,724 transactions made in April 2020 and 15,347 transactions made in May 2020.
- 4.14. Once lockdown eased in June 2020 and continued to ease throughout July 2020, cashless parking transactions increased to 35,655 and 62,572 respectively. It is clear that users are utilising the cashless payment system.
- 4.15. There are currently 66 active Pay & Display machines for cash transactions across

the borough's on-street parking locations. Many are old and some are beyond repair (i.e. parts no longer available, or costs are no longer viable). A review was undertaken in June 2019 to trial decommissioning Pay & Display machines at on-street locations that take in less than £30/week. Over 200 machines have been removed, and where machines have been decommissioned under this trial, users have been given the facilities to pay for their parking via the cashless PayByPhone system.

- 4.16. The Council will continue to monitor performance of the Pay & Display machines, with a view to further decommissioning underperforming machines or where repairs are no longer viable.

PARKING CONTRACTOR PERFORMANCE

5.1. The parking contractor's performance is measured by a set of Key Performance Indicators (KPIs). These include:

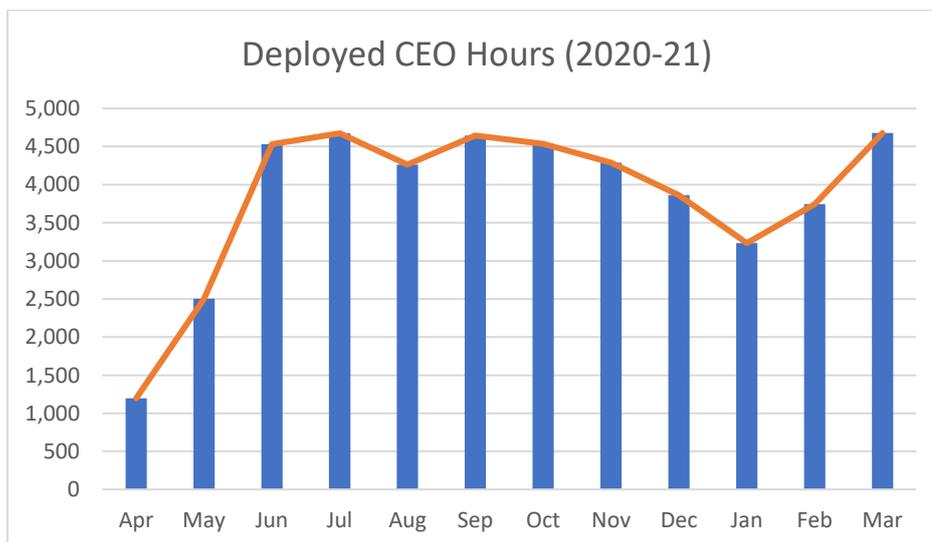
- Effective Parking Enforcement
- Customer Services
- Business Processing
- Banking and Financial

5.2. The above indicators are broken down into subheadings in Appendix 1, and a clear measurement target is set against each one. The KPIs are measured on a monthly basis, and where the contractor does not meet the target, they incur a financial penalty.

Effective Parking Enforcement

5.3. During lockdown, when parking enforcement was suspended, Civil Enforcement Officers (CEOs) were deployed for less hours. In April 2020, CEOs were deployed for a total of 1,196 hours and in May 2020, CEOs were deployed for a total of 2,503 hours. This deployment included the redistribution of labour to assist in other areas of the Council, as discussed in Section 7.

5.4. Parking enforcement resumed in June 2020, which saw CEO hours once again increase and remain consistent. During the winter months, CEO hours again decreased; however, this could potentially be attributed to the second nationwide lockdown, which began in December 2020 and was still ongoing in March 2021, where this year's data ends. It is projected that lockdown restrictions will ease on 12th April 2021.

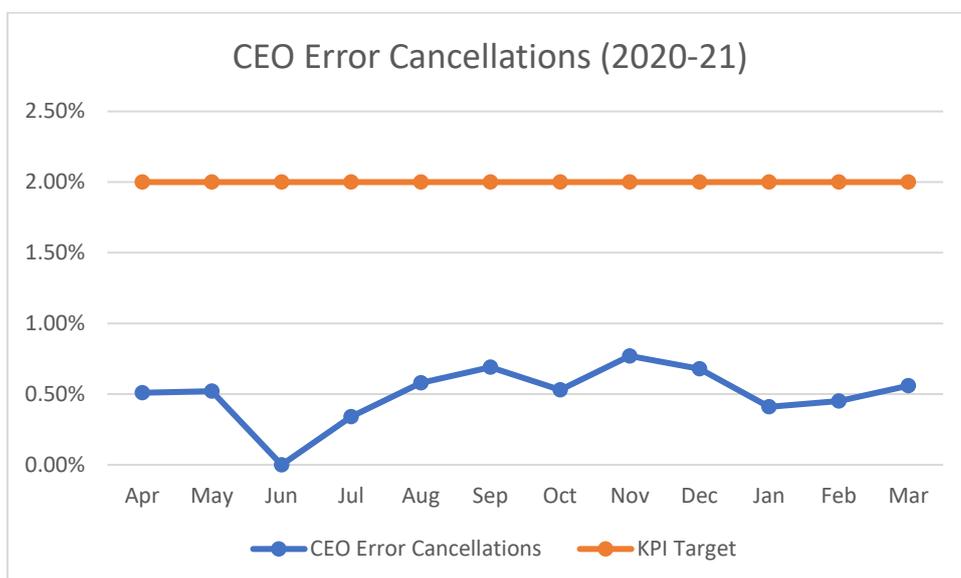


Good Quality, Motivated and Informed Civil Enforcement Officers

5.5. Staff retention is key to a stable service, especially if investment has been made in the training of staff. Staff turnover in the parking industry is high, due to the nature of the work involved. The turnover in 2020-21 was 14.28%.

Issue of Good Quality PCNs

- 5.6. To ensure PCN quality is maintained, the performance target is to obtain a CEO error rate below 2%. Performance against this KPI is excellent, as shown below:



Business Processing

- 5.7. The issuing and challenging of a PCN follows a statutory process that allows the right of appeal to the independent Environment and Traffic Adjudicators (ETA) at the London Tribunals. Responses to formal representations and appeals are authorised by Council staff.
- 5.8. This has been the biggest challenge for the contractor, as previously the performance indicator was measured against the statutory response time in relation to appeals (56 days). This has moved to 10 days, and on this indicator, the contractor succeeded in 10 out of the 12 months, as shown in Appendix 1.
- 5.9. The table below shows the annual appeal results, as reported by the ETA. The success rate of the contractor at appeal stage improved from 2016-17 to 2017-18. However, since then the department's success rate has decreased.
- 5.10. The number of appeals that were marked as 'Do Not Contest' (DNC) increased in 2020-21. DNCs mean that the contractor, on behalf of the Council, decides not to contest the customer's appeal, and this can occur for a variety of reasons. A DNC often results in the PCN being cancelled. Going forward in 2021-22, reducing the number of DNCs for appeals is an ongoing target for the contractor.

Appeals	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Total	573	385	566	555	701	1014
Upheld	135	116	168	148	148	60
Rejected	293	247	419	407	425	514
DNC	32	31	42	46	128	440
Success (%)	63.70%	62.69%	74%	73%	61%	51%

Customer Services

- 5.11. This KPI measures how effective the contractor is in dealing with complaints, issuing permits with a prescribed timescale, and the management of suspensions. The detailed performance is highlighted in Appendix 1.
- 5.12. In particular, the contractor has previously been penalised for poor performance in dealing with complaints. Complaints against service delivery (not including the issuing of PCNs, which follows the statutory process mentioned above) are managed through the Council's complaints procedure.
- 5.13. One of the KPIs for the contractor is to deliver a response to complaints within 5 working days. Below is the total number of complaints and the number of those complaints that were overdue. It is worth noting that the contractor began answering complaints on behalf of the Council in Autumn 2020.

Complaints	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Total	109	98	101	198	238	179
Overdue	5	14	33	28	52	20

Banking and Financial

- 5.14. The contractor's performance against these KPIs is outlined in Appendix 1.

Financial Penalty

- 5.15. There are two forms of payment that are issued to the contractor: fixed and performance based. If KPI targets are not met, a financial penalty is issued to the contractor. For 2020-21, a financial penalty of £40,840.57 was deducted from the contract.

FINANCIAL PERFORMANCE

- 6.1. This section sets out information relating to parking finances.
- 6.2. Parking charges are fixed in accordance with the requirements of the Road Traffic Regulation Act (1984). In April 2020, emissions-based parking permits were introduced, meaning that higher polluting vehicles now pay more for their permit. The cost of suspensions has not changed.
- 6.3. Paragraph 6.5 summarises the performance against budget for 2020-21, relating to both on- and off-street parking.
- 6.4. Paragraphs 6.6–6.9 set out the Council’s Parking Control Account for 2020-21. This account is a statutory requirement, and outlines the Council’s financial position in relation to on-street parking only. The Parking Control Account not only includes the proportion of direct management costs and income relating to on-street parking, but also a proportion of costs in respect of, for example, management and other support service overheads, an assessment of policy and planning costs, and capital charges.

Direct Parking Management

- 6.5. In 2020-21, the Council collected £8.2m income in respect of parking services, compared to a budget of £10.4m. The Council collected a further £4.3m in relation to Moving Traffic Contraventions (MTC). The income received can be broken down as follows:

Parking services (on/off street) - income collected in 2020-21 (net of VAT)		
	<u>£000s</u>	<u>%</u>
PCNs	3,911	48
P&D	1,893	23
Permit	2,300	28
Suspensions	108	1
Total Income 2020-21	8,212	100

Direct parking (on/off street) management expenditure	
	<u>£000s</u>
Enforcement contract costs	2,896
Management and admin costs	470
Car park utilities, rates, repairs and maintenance	480
Legal fees	190
Total expenditure 2020-21	4,036
Net Income 2020-21	4,176

Parking services (MTC) - income collected in 2020-21 (net of VAT)		
	<u>£000s</u>	<u>%</u>
PCNs	4,337	100
Total Income 2020-21	4,337	100

Direct parking (MTC) management expenditure	
	<u>£000s</u>
Enforcement contract costs	1262
Management and admin costs	791
Legal fees	95
Total expenditure 2020-21	2,148
Net income 2020-21	2,189

Parking Control Account 2020-21 (on-street parking only)

- 6.6. Under the Road Traffic Regulation Act (1984), the Council is required to keep an account of its income and expenditure in respect of its on-street parking places, and in respect to its functions as an enforcement authority, within paragraphs 2 and 3 of Schedule 7 to the Traffic Management Act (2004). After each financial year, the Council must report to the Mayor of London on any action taken, in accordance with the provisions of the Act in relation to any surplus or deficit in the account.
- 6.7. The use of any surplus is governed by Section 55 of the Act, which specifies that the surplus may be used for:
- making good to the General Fund for any deficits incurred in the On-Street Parking Account during the previous four years; or
 - meeting the cost of the provision and maintenance of off-street car parking in the borough, or in another Local Authority.
- 6.8. However, if it is considered unnecessary or undesirable to provide further off-street parking in this area, the surplus may then be used to fund:
- public passenger transport services;
 - highway or road improvement projects;
 - highway maintenance;
 - environmental improvements in its area; or
 - the cost of anything that has the approval of the Mayor of London, and which facilitates the implementation of the Mayor's Transport Strategy.
- 6.9. The Council's Parking Control Account for 2020-21 in respect of on-street parking and Moving Traffic Contraventions (MTC) is summarised below:

Borough Parking Control Account 2020-21		
	£000s	%
On-street Parking gross income		
Pay & Display	1,146	17
Permits	2,134	31
PCN	3,520	52
Total Income	6,800	100
On-Street Parking expenditure		
Enforcement contract costs	2,606	56
Management, admin and overheads	1,195	26
Running costs	603	13
Capital investment	225	5
Total Expenditure	4,629	100
Funds available for supporting highways and transportation	2,171	

Borough Parking (MTC) Control Account 2020-21		
	£000s	%
On-street Parking gross income		
Pay & Display	4,336	100
Total Income		100
On-Street Parking expenditure		
Enforcement contract costs	1262	
Management, admin and overheads	1220	
Running costs	95	
Total Expenditure	2,577	100
Funds available for supporting highways and transportation	1,759	

PARKING POLICY REVIEW

- 7.1. Following a comprehensive review in 2012-13, a report to the Sustainable Development Select Committee (SDSC) on refinement of the current policy and highlighting elements for review has been undertaken. The scope was limited to reviewing the following elements within the parking policy:
- a review of permit charging scales to a proposed arrangement based on vehicle emissions, in line with our Air Quality Action Plan;
 - disabled parking review to bring the policy in line with current regulations and best practice;
 - minor amendments to reflect changes to parking legislation and guidance since the last policy review; and
 - improve the customer journey for residents and businesses for permit application.
- 7.2. A review of the parking policy was carried out in 2019-20. Although some of the above items were approved in 2019-20, they were implemented in 2020-21.
- 7.3. Emissions-based parking permits were approved by Mayor and Cabinet in January 2020. However, due to the pandemic, they were delayed in implementation, and they were then introduced in April 2020. The scheme has been largely successful and has seen lesser polluting vehicles pay less for their permit, while higher polluting vehicles pay more. In 2020-21, the parking department began gathering information to put forward proposals to expand emissions-based parking charges, and these proposals will be decided upon in July 2021, and therefore will be discussed in the next annual report.
- 7.4. The review of disabled parking and minor amendments to reflect policy changes was ongoing in 2020-21 and is still ongoing.
- 7.5. The item of improving the customer journey when using the online system to apply for permits is discussed in more detail in Section 7.
- 7.6. Some of the proposed changes will be carried forwards to 2021-22:
- a review of short-stay parking charges to a proposed arrangement based on vehicle emissions, in line with our Air Quality Action Plan;
 - disabled parking review to bring the policy in line with current regulations and best practice;
 - minor amendments to reflect changes to parking legislation and guidance since the last policy review; and
 - continue to improve the customer journey for residents and businesses for permit application.
- 7.7. The parking policy review will also feed into the Parking Enforcement Plan (PEP) 2022-2027.

COVID-19 Response

- 8.1. In March 2020, the country entered lockdown in an effort to tackle the COVID-19 pandemic. In order to assist local residents and businesses, Parking Services took several steps to support both local residents and those who have been considered key workers throughout the pandemic.

Enforcement Suspension

- 8.2. As the country entered lockdown, many people began working from home. Parking enforcement was suspended to mitigate the impact on residents who would not normally have a permit or a place to park.
- 8.3. The suspension of parking enforcement ensured that Civil Enforcement Officers (CEOs) were not put at risk and it also prevented attacks on staff.
- 8.4. Although CEOs were not enforcing parking, they were redistributed among the Council to assist in other areas. CEOs attended parks to advise members of the public about social distancing, and later helped out in cemeteries. CEOs also assisted a blood dialysis mobile van to continue its work at Beckenham Place Park.
- 8.5. As lockdown eased, motorists were given 2 weeks of warning notices before enforcement resumed across the borough on 1st June 2020, and on this date, enforcement resumed to ensure key workers were not delayed by congested roads.

Key Worker Permit Scheme

- 8.6. The Key Worker Permit Scheme was introduced in the borough in April 2020. Key workers were required to apply for a free Key Worker Permit, which allowed regulation and monitoring of the number of permits issued.
- 8.7. The Key Worker Permit Scheme received several extensions, as unexpected lockdowns occurred in November 2020 and January 2021. Initially, it was planned to end in December 2020, but the end date was extended to 31st March 2021.
- 8.8. We are committed to reducing emissions and we are therefore encouraging key workers to utilise public transport where possible. Therefore, although it has again been extended, the scheme will come to an end on 31st May 2021.
- 8.9. However, for those who must drive to work, there will be two alternative permit options available for eligible NHS staff, to ensure they can park while continuing to provide essential services. More information can be found [here](#).
- 8.10. Between 1st April 2020 and 31st March 2021, 5424 Key Worker Permits applications were received and 4846 applications were authorised.

PARKING DEVELOPMENTS (2020-21)

- 9.1. There have been several parking developments in 2020-21. In particular, there have been schemes implemented to assist with the tackling of the COVID-19 response, as well as efforts to improve the customer journey on the new online permit system.

Improving the Customer Journey in the Parking Permit System

- 9.2. The new online parking permit system went live in April 2020. Instead of purchasing permits or vouchers through RingGo, permit holders were required to purchase permits through the Council's website. Among the permits available were Resident, Business and Visitor permits.
- 9.3. One item of feedback stated that there should be a requirement to activate a protected vehicle when there are two vehicles on one permit. To improve this, the parking department made changes to the application process so that it is explicitly clear that although two vehicles can be listed on one permit, only one can park in permit holder bays at any one time.
- 9.4. Improvements to the customer journey in the parking permit system will continue into 2021-22, as the parking department receives ongoing feedback from users to determine key issues with the system. A plan to improve the customer journey while using the parking permit system was created to collate key issues and outline the plan of action to combat these, and it is planned that many of these changes will go live in 2021-22.

Low Traffic Neighbourhood (LTN) and Exemptions

- 9.5. In May 2020, the government set out its expectation that local authorities would make significant changes to their road layouts to give more space to cyclists and pedestrians. The government also said that these measures should be delivered as swiftly as possible – within weeks – given the urgent need to change travel habits. This meant that there was no time to undertake the engagement and consultation that would usually be carried out.
- 9.6. The LTN was introduced to the London Borough of Lewisham in August 2020 to reduce through-traffic and create quieter and safer streets for walking and cycling during the pandemic, ensuring that people could socially distance. The Council's objective in restricting traffic flow was also to reduce emissions and improve air quality for the benefit of local residents.
- 9.7. The LTN locations are Dermody Road, Ennersdale Road, Leahurst Road, Manor Lane and Manor Park.
- 9.8. Warning notices were issued between 1st August and 29th August 2020 before full enforcement started. At first, temporary road closure signs were placed on the road to warn drivers of new restrictions and planter boxes were placed to narrow the road.
- 9.9. In November 2020, after the Council received feedback from local residents and businesses, the LTN was amended. The planter boxes and road closure signs were removed and the layout of the roads was amended. There are currently further plans to implement additional road signage at some LTN locations.

- 9.10. Vehicles are now able to travel one way through several of the restrictions, including Dermody Road, Ennersdale Road and Manor Park. The Manor Lane restriction is now open to all vehicles except Heavy Goods Vehicles (HGVs). Leahurst Road is now open to all vehicles except HGVs one way (west to east).
- 9.11. The LTN exemption scheme for Disabled Badge holders was also launched in November 2020. In order to obtain an exemption from the LTN, Disabled Badge holders must contact bluebudgetravel@lewisham.gov.uk and quote their Disabled Badge number. They must be a Lewisham resident and have a Disabled Badge that was issued by Lewisham Council.
- 9.12. More information about the restrictions can be found [here](#), and more information about Disabled Badge holder exemptions from the LTN can be found [here](#).
- 9.13. A public consultation regarding the LTN will take place in 2021.

FUTURE PARKING DEVELOPMENTS

- 10.1. Parking Services is always looking to develop the services it provides, to align with the Council's wider climate change agenda and to enforce effectively.
- 10.2. There are several parking schemes that are currently in development, and will be implemented throughout 2021-22. Therefore, a full description of the schemes below will be included in the 2021-22 report. However, a short outline of each scheme has been provided to inform which parking developments are in progress.

Improving the Customer Journey in the Parking Permit System

- 10.3. Improving the customer journey in the parking permit system is ongoing, as any feedback is constantly reviewed and used to continue developing the system. This is to ensure that the system remains user friendly and that customers' comments are taken into account.
- 10.4. One of the problems identified was a 'lack of available instructional material'. In order to tackle this, a Frequently Asked Questions (FAQs) page will be created to inform and assist users with the new system. The FAQs will include answers to questions surrounding protected vehicles, how to purchase visitor permits, and refunds. The FAQs page is planned to go live in June 2021.
- 10.5. A key issue raised was with the purchasing of visitor e-vouchers, and the idea that the user experience was 'clunky'. To combat this, the parking department is working to update the user interface with clearer buttons and signposting on the webpage. Some of these changes have been made, with more set to be implemented. An app, which will allow users to purchase and activate vouchers from their smartphone, was scheduled to be released in February 2021. However, this has been delayed, and the new proposed 'go live' date for the app is June 2021.
- 10.6. Other issues raised during feedback include confusing terminology, permit communications and evidence requirements, which are all currently under review.

Emissions-based Parking Charges

Short-stay

- 10.7. Due to the success of emission-based permits, the Council is now proposing to introduce emissions-based short-stay parking. Currently, the average charge for short-stay parking across the borough is £2.00, and motorists with lesser polluting vehicles pay the same amount to park as those with higher polluting vehicles.
- 10.8. Emissions-based short-stay parking will ensure that visitors also pay for parking based on their emissions, and the aim is to reduce the negative impact on local residents' health by tackling harmful emissions.
- 10.9. The report proposing emissions-based short-stay parking charges will be presented to the Sustainable Development Select Committee (SDSC) on 30th June 2021, and to the Mayor and Cabinet on 14th July 2021.
- 10.10. Therefore, the progress of this scheme will be discussed in further detail in the 2021-22 Parking Annual Report.

Motorcycles

- 10.11. Along with the plan to introduce emissions-based short-stay parking, the Council is also proposing to introduce motorcycle parking charges for the first time. These will also be emissions-based.
- 10.12. The report proposing the introduction of emissions-based motorcycle parking charges will be presented to the Sustainable Development Select Committee (SDSC) on 30th June 2021, and the Mayor and Cabinet on 14th July 2021.
- 10.13. Therefore, the progress of this scheme will be discussed in further detail in the 2021-22 Parking Annual Report.

School Streets

- 10.14. The School Streets programme is a timed restriction of roads outside schools, which prevents vehicular traffic passing through at the start and end of the school day. This is to reduce emissions around schools and improve the health of staff, parents and pupils.
- 10.15. Exemptions will be available for residents who live within approved School Streets. In addition, an exemption will be granted to Blue Badge holding parents, staff or pupils. All those with grounds for an exemption will need to obtain a free permit using the online permit system.
- 10.16. The planned 'go live' date for School Street restrictions is 19th April 2021.

Health Permits

- 10.17. As the Key Worker Permit scheme will end on 31st May 2021, the parking department plans to issue Health Permits to NHS workers, so that they may still park near Lewisham Hospital. This will ensure that they can continue to carry out the essential work necessary to assist members of the public.
- 10.18. In addition, the hospital will continue to be responsible for issuing parking to its staff, ensuring that they have a secure place to park their vehicle. In terms of sustainability, health workers will be encouraged to use public transport or to cycle where possible.

Parking Enforcement Plan (PEP)

- 10.19. A Parking Enforcement Plan (PEP) is currently in progress to provide insight on how Parking Services will continue enforcing the borough, any long-term changes, and the prospects of those changes. When completed, Lewisham Council's PEP will be available on the website alongside the Parking Annual Reports, the Parking Policy, and the Code of Practice.

IMPLICATIONS

Financial

- 11.1. The purpose of this report is to provide an update on the parking policy and CPZ programme and to give an overview of the parking contract performance. As such there are no financial implications directly arising from this report.
- 11.2. Details of the Council's financial performance in terms of the parking service are set out in Section 6 (Financial Performance), and comply with both the Road Traffic Regulation Act (1984) and the Local Government Transparency Code (2015), which was published by the Ministry of Housing.

Legal

- 12.1. Section 87 of the Traffic Management Act 2004 requires a local authority to have regard to guidance published by the Government relating to their functions in connection with the civil enforcement of traffic contraventions. The Government published such updated statutory guidance in June 2020.
- 12.2. That Guidance requires that Enforcement authorities should produce an annual report about their enforcement activities within six months of the end of each financial year. The report should be published and, as a minimum, it should cover the financial, statistical and other data (including any parking or civil parking enforcement targets) set out in Annex A to the Guidance.
- 12.3. Section 45(1) Road Traffic Regulation Act 1984 (RTRA) allows Councils to designate parking places on the highway and to charge for the use of them. Section 45(2) provides for the issuing of permits for which an authority may charge. The procedure requires consultation and a designation order.
- 12.4. Section 122 RTRA imposes a general duty on authorities to exercise functions under the Act (so far as practicable having regard to the matters set out at para 13.3 below) 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.
- 12.5. In fulfilling the general duty imposed by Section 122 RTRA, the matters referred to above are as follows:
 - the desirability of securing and maintaining reasonable access to premises;
 - the effect on the amenities of any locality the importance of regulating and restricting the use of roads by heavy commercial vehicles so as to preserve or improve the amenities of the areas through which the roads run;
 - 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; and
 - any other matters appearing to the Council to be relevant.
- 12.6. Section 55 RTRA provides for the establishment of a separate account into which monies raised through the operation of on street parking must be paid. The Act requires an enforcement authority, (of which Lewisham is one), to keep an account of:

- their income and expenditure in respect of designated parking places;
 - their income and expenditure as an enforcement authority in relation to parking contraventions within paragraph 2 of Schedule 7 to the 2004 Act (parking places); and
 - their income and expenditure as an enforcement authority in relation to parking contraventions within paragraph 3 of that Schedule (other parking matters).
- 12.7. It also deals with shortfalls and surpluses. Shortfalls must be made good from the General Fund, and subject to carry forward provisions, any surplus must be applied for the following purposes:
- the making good of shortfalls in the last 4 years;
 - the provision and maintenance of off-street parking by the Council or others; or
 - if further off-street parking appears unnecessary or undesirable then
 - meeting the cost of provision, operation or facilities for public transport services; and
 - highway or road improvement projects in the area.
- 12.8. There are also provisions for carry forward. Every London Borough also has to report to the Mayor for London at the end of every financial year on any action taken in relation to any deficit or surplus on their account.
- 12.9. The Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (England) Regulations require traffic regulation orders to include an exemption from waiting prohibitions in certain circumstances, and from charges and time-limits at places where vehicles may park or wait, in respect of vehicles displaying a disabled person's badge.
- 12.10. The Equality Act 2010 (the Act) brings together all previous equality legislation in England, Scotland and Wales. The Act includes a new Public Sector Equality Duty (the duty), replacing the separate duties relating to race, disability and gender equality.
- 12.11. The duty consists of the 'general equality duty' which is the overarching requirement or substance of the duty, and the 'specific duties' which are intended to help performance of the general equality duty.
- 12.12. The duty covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 12.13. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.

- 12.14. These are often referred to as the three aims of the general equality duty.
- 12.15. The duty is a “have regard duty”, and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 12.16. The Equality and Human Rights Commission (EHRC) have issued technical guidance for public authorities in England on the Public Sector Equality Duty. The guidance can be found at <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance//>. This Guidance provides practical approaches to complying with the Public Sector Equality Duty. The EHRC technical guidance is not a statutory Code, but may be used as evidence in legal proceedings to demonstrate compliance with the Public Sector Equality Duty.

Crime and Disorder

- 13.1. There are no direct crime and disorder implications arising from this report.

Equalities

- 14.1. Key positive equalities impacts on Age, Disability, Pregnancy and Maternity Include:
- continued provision of resident parking permits free of charge to Blue Badge holders;
 - quicker resolution of parking issues, that prevent people with mobility issues or young families, parking close to their homes, and create neighbourhood tensions; and
 - transparent criteria and application process for new disabled parking bays, and a programme of review to manage and fund these requests.
- 14.2. Moving forward, the Council will also need to give greater consideration to the accessibility of its engagement processes with local areas on proposed new parking restrictions. These need to allow sufficient time for full participation by all members of the community and aim to increase voter turnout through the provision of information in alternative formats as necessary.
- 14.3. The Council will also need to ensure that any move away from the use of Pay and Display machines is accompanied by an appropriate communications campaign. This should clearly set out the alternative payment methods available and reassure residents or visitors that do not have access to the Internet, a mobile phone or credit/debit card, that they still have legitimate payment options, that allow them to park safely and conveniently in Lewisham. Consideration should also be given to those who might be vulnerable from a personal safety perspective, particularly in parking locations that are poorly lit or isolated – i.e. if they are required to use their mobile phone or credit/debit cards in public view. The provision of additional payment options as technology evolves must also be considered in terms of accessibility for the user, to prevent indirect discrimination from occurring. For example, alternatives such as top-up cards, should consider the proximity and hours of operation of the nearest PayPoint location in relation to the on-street parking bays. This may be very significant for service users with mobility issues.

- 14.4. The Council also needs to ensure that any web-centric parking policies make alternative provision for those without access to the Internet, to ensure equitable provision of the service.

Environmental

- 15.1. With the introduction of emissions-based charging for parking permits, the Council hopes to have a positive impact on the environment, in that emissions-based charging will encourage the take up of lesser polluting vehicles.
- 15.2. Along with this, future development such as the school streets scheme, emissions-based charging for short stay parking, and the introduction of motorcycle parking charges, aim to contribute to the Council's wider climate change agenda and coincide with the aim to be carbon neutral by 2030.

APPENDICES

Appendix 1 – Contractor KPI Summary (2020-21)

	Contract Year (2020-21)	Description	Pass	Fail
1	Effective Parking Enforcement			
1 a)	Number of CEO hours deployed to be as per contractual requirement	Target deployed hours 95%	7	5
1 b)	Number of CEOs employed	Number of CEOs employed (KPI not more than 10% of overtime)	12	0
1 c)	Number of PCNs cancelled due to CEO error (2 months in arrears)	PCNs cancelled due to CEO errors not greater than 2%	12	0
1 d)	Number of PCNs cancelled due to processing errors (2 months in arrears)	PCNs cancelled due to processing errors not greater than 2%	11	1
1 e)	Number of PCNs cancelled due to CCTV processing errors (measured in current month)	PCNs cancelled due to CCTV processing errors not greater than 2%	12	0
2	Customer Services			
2 a)	All correctly completed permit applications to be processed within 1 working day	All correctly completed permit applications to be processed within 1 working day	12	0
2 b)	All customer complaints to be responded to in a professional manner	Target level 100%	12	0
2 c)	All complaints to be responded to within 5 working days	Target level 100%	4	8
2 d)	Suspensions to be implemented on time Suspension sign to be erected 3 working days prior to the suspension date	Target level 100%	12	0
2 e)	Suspension to be accurately described on the suspension signage	Target level 100%	11	1
2 f)	Suspension signs to be removed within two working days of the end of the suspension	Target level 100%	12	0
3	Business Processing			
3 a)	Failure to correctly log, scan, process or correctly allocate any item of post to PCN within required timescale	Target level 100%	12	0
3 b)	All correspondence must be responded within 10 working days	Target level 100%	10	2
3 c)	All postage PCNs must be sent out within 14 days of contravention date for VDAS and other fail to serve	Target level 100%	12	0
3 d)	All CCTV PCNs to send within 14 days of contravention date	Target level 100%	10	2
3 e)	All statutory declarations and witness statements must be processed within 14 days	Target level 100%	12	0
3 f)	All appeals for LBL approval must be submitted within 5 working days of evidence due date	Target level 100%	11	1

3 g)	All queues must be reviewed on a weekly basis and appropriate action taken	Target level 100%	12	0
3 h)	All court and bailiff files must be processed within 2 working days	Target level 100%	11	1
4 Banking & Financial				
4 a)	All money taken on behalf of Lewisham Borough Council to be fully reconciled monthly	Target level 100%	3	9
4 b)	Cash collections to be carried out as per the agreed schedule	Target level 100%	12	0
4 c)	All money to be banked next working day	Target level 100%	12	0