

LONDON BOROUGH OF LEWISHAM

REPORT	Delegated Decision Report 16/05/2022
Report Title	Motorcycle Parking Charges TMO Results of Consultation and Recommendations
Department	Housing, Regeneration and Public Realm
Report Author/ Contact details	Seamus Adams Head of Commercial Operations and Development Public Realm Directorate of Housing Regeneration and Public Realm Lewisham Council 020 8314 7971
Wards affected	Boroughwide
Public Access	Personal details to be redacted before being released to the public
Appendices	Appendix A Motorcycle Parking Pricing Structure Appendix B Notice of Proposals (published in the London Gazette and South London Press on 25 th February 2022) Appendix C Responses from Mr T Tabinski, and Owen Hilton

1. SUMMARY

- 1.1 The report was presented to, and approved by, the Mayor and Cabinet on 14th July 2021 on the proposed introduction of charges for motorcycle parking and an associated pricing model, subject to public consultation.
- 1.2 The public consultation took place between 9th August and 1st November 2021, and the full results were considered by the Mayor and Cabinet on 12th January 2022.
- 1.3 As a result of concerns raised during the public consultation, a new pricing structure for motorcycle permits (based on emission-based bandings) and short stay parking was approved, subject to the formal Traffic Management Order (TMO) process and the outcome of the statutory 21-day consultation period.
- 1.4 The pricing structure referred to in paragraph 1.3 is set out in Appendix A to this report.
- 1.5 Delegated authority was granted to the Executive Director of Housing, Regeneration and Public Realm to consider the outcome of the TMO consultation process and whether to approve the implementation of the new scheme.
- 1.6 This report sets out the outcome of the TMO consultation process.

2. TMO CONSULTATION PROCESS

- 2.1 The formal TMO consultation took place between 25th February and 18th March 2022 which included:
 - Publication of the “Notice of Proposals” in the London Gazette and the South London Press on 25th February 2022;
 - the posting of street notices in every street within a controlled parking zone throughout Lewisham;

- emails to statutory / representative organisations, including the emergency services, Transport for London (TfL) and other key parties.

2.2 The Notice of Proposals referred to above is attached as Appendix B.

3. OBJECTIONS / FEEDBACK

- 3.1 During the statutory TMO consultation period two responses were received from local residents, Owen Hilton and Tom Tabinski. The responses are outlines in Appendix C, together with officers' comment.
- 3.2 Save London Motorcycling, a motorcycling lobbyist group, submitted their concerns about the proposals to introduce motorcycle parking charges as part of the initial public consultation. Council officers subsequently met with representatives from Save London Motorcycling and the London Branch of the Motorcyclist Group to discuss those concerns.
- 3.3 The policy of both organisations is that motorcycles should not be charged to park in Lewisham. However, they proposed a pricing model that they considered was fairer than the initially proposed pricing structure and more proportionate to the impact of motorcycles on the environment. As a result, the new pricing structure (set out in Appendix A) was approved by the Mayor and Cabinet in January 2022.
- 3.4 During the TMO consultation Save London Motorcycling raised an additional concern that the proposed £2 daily pass is only available for paid-for or shared-use bays and that there may not be sufficient provision to meet demand. They considered that this would have the potential to disadvantage riders who are working in the borough for a short period of time, or for a business that is not registered in the borough. They also pointed out that there are very few solo motorcycle parking bays in Lewisham.
- 3.5 Therefore, motorcyclists who pay for short stay parking (80p an hour / £2 a day) may use permit holder bays, as well as "paid for" and shared-use bays.
- 3.6 On 21st April 2022 a representative from Save London Motorcycling confirmed that they had withdrawn their objections as their concerns and queries have been fully addressed.

4. IMPLICATIONS

- 4.1 The financial, legal and equalities implications of the scheme, and the impact on climate change, the environment and health and wellbeing are set out in the Mayor and Cabinet Report approved on 12th January 2022.

5. BACKGROUND INFORMATION (as defined by Local Government (Access to Information) Act 1985)

- [12th January 2022 – Mayor and Cabinet Report](#)
"Response to the Sustainable Development Select Committee's comments on emissions-based short stay and motorcycle parking charges and Consultation Report".
[Motorcycle Parking Consultation Report](#)
- [14th July 2021 - Mayor and Cabinet Report](#)
"Introduction of emission-based short-stay parking charges and motorcycle parking charges"
[Introduction of Motorcycle Parking Charges](#)

6. RECOMMENDATIONS

It is recommended that, following consideration of the responses to the consultation:

- (a) motorcycle charging is implemented in line with the details set out in paragraph 5 of the Mayor and Cabinet report of 12th January 2022, and in accordance with the pricing structure shown in Appendix A to this report (including the revision referred to in paragraph (b));
- (b) that the TMO to facilitate the introduction of motorcycle charges is made, as proposed, with the additional provision that motorcycles who pay for short stay parking (80p an hour / £2 a day) may use permit holder bays, as well as pay-by-phone and shared use bays;
- (c) Officers will look into installing lockable bays on-street, in car parks and key locations where the uptake of motorcycles would be most prominent, following concerns about security; and
- (d) The pricing structure for motorcycle parking charges will be kept under constant review.

I agree / disagree with the recommendations.

Signed



Date

16 May 2022

Zahur Khan
Director of Public Realm
Directorate of Housing, Regeneration and Public Realm
Lewisham Council

APPENDIX A

(Appendix D of “Response to the Sustainable Development Select Committee’s comments on emissions-based short stay and motorcycle parking charges and Consultation Report”)

Appendix D – New Proposed Pricing Structure for Motorcycle Parking Charges

Motorcycle Resident Permit:

Band	Engine (cc)	Emissions (g/km CO ₂)	Price (3 months)	Price (6 months)	Price (12 months)
N/A	Electric motorcycle		Free	Free	Free
1	Up to 150	Up to 70	£5.00	£10.00	£20.00
2	151-400	71-90	£7.50	£15.00	£30.00
3	401-600	91-100	£8.75	£17.50	£35.00
4	601+	101+	£10.50	£21.00	£42.00

Motorcycle Essential Health and Motorcycle Hospital Health Permits:

Band	Engine (cc)	Emissions (g/km CO ₂)	Price (3 months)	Price (6 months)	Price (12 months)
N/A	Electric motorcycle		Free	Free	Free
1	Up to 150	Up to 70	£12.50	£25.00	£50.00
2	151-400	71-90	£18.75	£37.50	£75.00
3	401-600	91-100	£25.00	£50.00	£100.00
4	601+	101+	£31.25	£62.50	£125.00

Motorcycle Business Permits:

Band	Engine (cc)	Emissions (g/km CO ₂)	Price (3 months)	Price (6 months)	Price (12 months)	Daily Business Pass	Weekly Business Pass
N/A	Electric motorcycle		Free	Free	Free	Free	Free
1	Up to 150	Up to 70	£12.50	£25.00	£50.00	£2.00	£6.00
2	151-400	71-90	£18.75	£37.50	£75.00	£3.00	£7.00
3	401-600	91-100	£25.00	£50.00	£100.00	£4.00	£8.00
4	601+	101+	£31.25	£62.50	£125.00	£5.00	£9.00

Motorcycle Resident Visitor Permit:

Type	1-hour	Book of 10 1-hour vouchers	5-hour	1-day	1-week
Motorcycle Visitor	£0.80	£8.00	£1.60	£2.00	£7.50

Motorcycle Short Stay Parking in PayByPhone / Pay & Display bays:

Per 15 mins	Per hour	Per day
£0.20	£0.80	£2.00

Motorcycle Disabled Resident Permit:

Motorcycle Disabled Resident Permits are free of charge and allow the holder to park in Resident Permit Holder bays.

Motorcycle School Streets Exemption Permit (1 per vehicle):

Motorcycle School Street Exemption Permits are free of charge and allow the holder to enter school street restrictions on the street on which they live.

Motorcycle Carer Permit:

Motorcycle Carer Permits are free of charge and valid for parking across the borough for up to 4 hours.

London Borough of Lewisham

MOTORCYCLE PARKING ON-STREET PARKING CHARGES

1. NOTICE IS HEREBY GIVEN that Lewisham Borough Council propose to make the above Order under sections 45, 46, 49 and 124 of and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984, as amended.
2. The general nature and effect of the Orders would be to introduce parking charges for motorcycles left in designated on-street parking places within each controlled parking zone (CPZ) in Lewisham. Motorcycles must park perpendicular to the kerb within bay markings.
3. The cost of Resident, Health / Hospital and Business Motorcycle permits, and period of validity are set out in Schedule 1 to this Notice. These permits would be issued based on the emissions bandings set out in Schedule 2.
4. The cost for Motorcycle Resident Visitor Permits (valid in Shared Use and Resident Permit Holder bays in the CPZ in which the resident lives) shall be:
 - £0.80 for a 1-hour permit;
 - £8.00 for a book of 10 x 1-hour permits;
 - £1.60 for a 5-hour permit;
 - £2.00 for a 1-day permit; and
 - £7.50 for a 1-week permit.
5. The charge for a motorcycle left in short-stay “Pay by Phone” or Shared Use bays shall be:
 - £0.20 for a maximum parking period of 15 minutes;
 - £0.80 for a maximum parking period of 1 hour; and
 - £2.00 for a maximum parking period of one day.
6. Please note that there would be no charge for:
 - Motorcycle Resident Permits issued in respect of electric motorcycles;
 - Motorcycle Resident Permits issued to residents who hold a valid disabled persons’ badge; and
 - Motorcycle Carer Permits issued to residents who meet the Council’s eligibility criteria (provided that the motorcycle is being used by a person carrying out “carer” duties for the resident and is left for a maximum parking period of 4 hours).
7. A pack of documents giving more detailed particulars of the Order can be collected for inspection between 9 am and 5 pm on Monday to Friday at the office of the London Borough of Lewisham, Laurence House, 1 Catford Road, London SE6 4RU. Please go to the security office at the rear of the building and request a pack of documents for ‘Motorcycle parking - TMO.’ Alternatively, the Order and other documents giving more detailed particulars of the Order can also be obtained by emailing a request to parkingdesign@lewisham.gov.uk quoting reference ‘Motorcycle parking - TMO’.
8. Further details on motorcycle parking charging and the process for applying for a motorcycle permit can be found on the Council’s website: [Lewisham Council - Parking permits for controlled parking zones](#).

APPENDIX B (continued)

9. Any objection or other representations relating to the proposed Orders must be made in writing and all objections must specify the grounds on which they are made and must be emailed to: parkingdesign@lewisham.gov.uk or posted to Lewisham Transport Policy & Development, 5th Floor Laurence House, 1 Catford Road, London SE6 4RU, quoting reference 'Motorcycle parking - TMO' to arrive not later than 21 days from the date of publication of this notice. Any objection may be communicated to other persons who may be affected.

Dated: 25th February 2022
LOUISE MCBRIDE
Head of Strategic Transport

Laurence House
1 Catford Road
London SE6 4RU

SCHEDULE 1 – CHARGES FOR MOTORCYCLE PERMITS

Motorcycle Resident Permits

(valid at Resident Permit Holder and Shared Use bays within the CPZ in which the resident lives)

Band	Cost (3 months)	Cost (6 months)	Cost (12 months)
1	£5.00	£10.00	£20.00
2	£7.50	£15.00	£30.00
3	£8.75	£17.50	£35.00
4	£10.50	£21.00	£42.00

Motorcycle Health and Hospital Permits

(valid at Resident Permit Holder and Shared Use bays)

Band	Cost (3 months)	Cost (6 months)	Cost (12 months)
1	£12.50	£25.00	£50.00
2	£18.75	£37.00	£75.00
3	£25.00	£50.00	£100.00
4	£13.25	£62.50	£125.00

Motorcycle Business Permits

(valid at Business Permit Holder and Shared Use bays across all CPZs)

Band	Cost (3 months)	Cost (6 months)	Cost (12 months)	Cost (Daily)	Cost (Weekly)
1	£12.50	£25.00	£50.00	£2.00	£6.00

APPENDIX B (continued)

2	£18.75	£37.00	£75.00	£3.00	£7.00
3	£25.00	£50.00	£100.00	£4.00	£8.00
4	£13.25	£62.50	£125.00	£5.00	£9.00

SCHEDULE 2 – MOTORCYCLE BANDS

Band	Cylinder Capacity (cc) of engine	Carbon dioxide gas emissions in grams per kilometre driven (CO₂g/km)
1	Up to and including 150cc	up to and including 70 CO ₂ g/km
2	from 151cc to 400cc inclusive	from 71 to 90 CO ₂ g/km inclusive
3	from 401cc to 600cc inclusive	from 91 to 100 CO ₂ g/km inclusive
4	601cc and above	101 CO ₂ g/km and above

RESPONSE FROM MR T TABINSKI (email dated 29th March 2022)

Response	Officers' comment
<p>I am writing to strongly object to the introduction of motorcycle parking charges in the Lewisham borough. I saw a street sign near my children's school in Lee and another on Canadian Avenue in Catford outlining the council's intention and looked up the following document* on the council website which I will refer to.</p> <p><i>* link to the Mayor and Cabinet report dated 14th July 2021 - "Introduction of emission-based short-stay parking charges and motorcycle parking charges"</i></p> <p>Mr Tabinski's grounds of objection are as follows:</p> <p>(a) Point 3.6 of the document referenced above states the "mental and physical health of Londoners is, to a large extent, determined by the environment in which they live" and that clean air and climate change have a significant impact on health. Mental and physical health is also dictated by one's financial situation which this policy seems to skip over completely.</p> <p>(b) Is now really the right time to be introducing another charge when living standards are set to drop due to further tax increases, energy prices doubling & inflation rising to near double figures? The cost of living now is very high and wages are not increasing at the same rate.</p>	<p>Mr Tabinski's objection is acknowledged. However, it should be noted that the response is based on the content and proposed charging structure in the Mayor and Cabinet report dated 14th July 2021, which was superseded by a revised structure set out in the Mayor and Cabinet report of 12th January 2022.</p> <p>The Council has carried out an Equality Analysis Assessment to consider the potential impact on those with differing socioeconomic statuses and recognises that actions to limit carbon emissions could disadvantage low income and vulnerable individuals and communities.</p> <p>Those on a lower income would now need to pay for their parking which ultimately would be a negative income on this protected characteristic group, as their parking was free of charge previously.</p> <p>However, in order to mitigate this effect, the prices for permits have been drastically reduced from those originally proposed which will be more affordable for those on lower incomes.</p> <p>It is thought that some individuals on lower incomes live within the busiest areas of the borough, and with the introduction of emissions-based permits for all vehicles, it is considered that this would have a positive effect on health.</p> <p>Lewisham Council is aware of the rising cost of living and how the proposed change will impact various courier drivers working in the borough, and this has been factored into the proposal by ensuring affordable permit charges at the daily rate from £2.</p>

APPENDIX C (continued)

Response	Officers' comment
<p>Many people (and I include myself in this) are finding life financially difficult right now and I question the council's decision to push these additional charges through at what is already a difficult time for people.</p>	<p>Further discount will be applied for customers wishing to pay for a longer period by offering weekly, 3 months, 6 months or annual tariff payments to provide flexibility.</p> <p>In addition, electric motorcycles are offered parking permits a free of charge. Lewisham believes that the proposed change will help tackle the air quality action plan towards limiting carbon emission which is considered to have a positive effect on health and the economy in longer term.</p>
<p>(c) Point 4.5.3 states petrol vehicles cause 8% of all carbon emissions however there is no breakdown specific to motorcycles and it's important to know this breakdown as motorcycles likely make up a very small part of this percentage. To effectively and quickly achieve the goal of net zero emissions isn't it more important to place focus on where the biggest and most effective changes can be made, while still allowing for people to go about their business?</p>	<p>Following publication of the July 2021 Mayor and Cabinet Report, concerns were raised that the proposed pricing structure was not proportionate to the environmental impact of motorcycles.</p> <p>The original pricing structure was based on the HMRC banding of cars, but the revised structure (set out in Appendix A to this report) aims to be fairer to motorcyclists by taking motorcycle emissions into account. In other words, motorcyclists will be paying a proportion of the charge for larger vehicles.</p> <p>The Council also recognises that the original price for a motorcycle business permit was too expensive considering the financial status of workers and those that may need to travel throughout the borough to complete their work. As a result, a significantly lower cost all-zone motorcycle business permit will be introduced.</p>
<p>(d) Motorcycles produce the smallest percentage of harmful gases but enable many to get to and from work without blocking streets, taking up large areas for parking or requiring expensive alterations to the layout of streets and footways. Congestion goes hand in hand with pollution and encouraging motorcycle use, through free parking, would reduce congestion, reduce the time stopped at traffic lights, provide quicker travel times and help to achieve the target set out in point 4.5.4 (encourage the take up of lower emission vehicles),</p>	<p>Motorcycles are known to emit harmful air pollutants including carbon emissions, nitrogen oxide, and particulate matter (PM2.5). Particulate matter is especially dangerous, as it can enter the lungs and cause cardiovascular disease.</p> <p>To help reduce the negative impact of motorcycle emissions on health and the environment, the Council's Sustainable Development Select Committee recommended introducing motorcycle parking charges in June 2021.</p> <p>However, the Council recognises that, although motorcycles do pollute, swapping</p>

APPENDIX C (continued)

Response	Officers' comment
<p>while reducing carbon emissions, as there would be less congestion.</p>	<p>out a car for a motorcycle is a step towards owning a lesser polluting vehicle.</p>
<p>It is one of the goals of the council to ensure traffic flows effectively (point 7.2) and the use of motorcycles facilitates this. Why then charge for their use?</p> <p>(e) It feels like this is yet another Lewisham "cash grab" initiative pointed directly at the easiest group of people to tax: the motorist. With registration plates and ANPR cameras everywhere it's just too easy to pinch cash from this apparently rich group of people who own a personal vehicle. We are beginning to come out of the pandemic and multiple lockdowns, the economy needs to recover, and local businesses require much needed cash injections from shoppers. My worry is that Lewisham is financially strangling their residents and visitors so much that they will not travel to these businesses, and instead decide to shop online or at bigger shopping centres where parking is free. This will certainly be my course of action if I am to be charged for parking my motorcycle.</p>	<p>In an effort to protect the health of local residents, tackle climate change and improve air quality, the introduction of emissions-based parking charges for motorcycles would bring the Council's parking policy in line for all vehicles across the borough.</p>

RESPONSE FROM MR OWEN HILTON (email dated 8th March 2022)

Response	Officers' comment
<p>I would like to register my objection to the proposed motorcycle on-street parking charges in the Borough of Lewisham. I do so on the following grounds.</p> <p>Mr Hilton's grounds of objection are as follows:</p> <p>(a) The charges will adversely affect low paid workers who are dependent on motorcycles for transport to carry out their duties. I am thinking in particular of food delivery workers (Deliveroo, etc.) and couriers</p> <p>(b) The charges will disproportionately affect members of ethnic minorities, who form the majority of workers in the above-mentioned occupations.</p> <p>(c) The charges will also punish low-paid residents of the Borough who are dependent on their motorcycles for transport but are unable to afford off-street parking for their vehicles.</p> <p>(d) A single fine levied for non-compliance with the regulations, inadvertent or otherwise, could easily wipe out an entire day's income for a delivery worker.</p>	<p>Mr Hilton's objection is acknowledged. However, it should be noted that the response is based on the content and proposed charging structure in the Mayor and Cabinet report dated 14th July 2021, which was superseded by a revised structure set out in the Mayor and Cabinet report of 12th January 2022.</p> <p>The Council has carried out an Equality Analysis Assessment to consider the potential impact on those with differing socioeconomic statuses and recognises that actions to limit carbon emissions could disadvantage low income and vulnerable individuals and communities.</p> <p>Those on a lower income would now need to pay for their parking which ultimately would be a negative income on this protected characteristic group, as their parking was free of charge previously.</p> <p>However, in order to mitigate this effect, the prices for permits have been drastically reduced from those originally proposed which will be more affordable for those on lower incomes.</p> <p>It is thought that some individuals on lower incomes live within the busiest areas of the borough, and with the introduction of emissions-based permits for all vehicles, it is considered that this would have a positive effect on health.</p> <p>Lewisham Council is aware of the rising cost of living and how the proposed change will impact various courier drivers working in the borough, and this has been factored into the proposal by ensuring affordable permit charges at the daily rate from £2.</p>

APPENDIX C (continued)

Response	Officers' comment
<p>(e) The plan to vary charges depending on the capacity of the motorcycle is inequitable. No such variation exists for four-wheeled vehicles.</p>	<p>Following publication of the July 2021 Mayor and Cabinet Report, concerns were raised that the proposed pricing structure was not proportionate to the environmental impact of motorcycles.</p> <p>The original pricing structure was based on the HMRC banding of cars, but the revised structure (set out in Appendix A to this report) aims to be fairer to motorcyclists by taking motorcycle emissions into account. In other words, motorcyclists will be paying a proportion of the charge for larger vehicles.</p>
<p>(f) The requirement to park perpendicular to the kerb, referred to in your Paragraph 2, is absurd. Gradient, road camber, and the shape of gutters adjacent to the kerb can make it dangerously impractical to park a motorcycle on its side-stand perpendicular to the kerb.</p>	<p>Motorcycles are currently required to park perpendicular to the kerb when parking in on-street bays, so that they do not obstruct spaces for larger vehicles as well as maximise use of parking spaces.</p> <p>This will continue to apply to reflect the proportion that they would be paying to park in relation to larger vehicles within the new parking structure.</p>
<p>(g) The small footprint of motorcycles in the Borough means that relief of parking congestion cannot be used to justify charges.</p>	<p>Motorcycles are known to emit harmful air pollutants including carbon emissions, nitrogen oxide, and particulate matter (PM2.5). Particulate matter is especially dangerous, as it can enter the lungs and cause cardiovascular disease.</p> <p>To help reduce the negative impact of motorcycle emissions on health and the environment, the Council's Sustainable Development Select Committee recommended introducing motorcycle parking charges in June 2021.</p> <p>However, the Council recognises that, although motorcycles do pollute, swapping out a car for a motorcycle is a step towards owning a lesser polluting vehicle.</p>