	Sustainable Development Select Commi	ttee	
Title	Annual parking report for 2018-19		
Contributors	Executive Director for Customer Services Head of Public Services		Item
Class	Part 1 (open)	ТВС	

1. Summary

- 1.1. This report provides information on the activities of the Lewisham Parking Service during 2018-19 in accordance with the Traffic Management Act (TMA) 2004.
- 1.2. It documents the Council's achievements in the context of parking enforcement and managing parking demand across the borough and includes an update on the Controlled Parking Zone (CPZ) Programme.
- 1.3. The report also includes parking and enforcement statistics, plus financial information with comparative data from previous years.
- 1.4. The Council has made a commitment to provide transparency in relation to the financial position of the Council's parking account. This report sets out the parking income and how this has been spent.
- 1.5. The report also provides an overview of the Parking Policy update undertaken in 2019.

2. Purpose

2.1. To provide an update on the London Borough of Lewisham's Parking activities for financial year 2018-19.

3. Recommendations

The Committee is recommended to:

- 3.1. Note progress of this year's CPZ programme in paragraph 6.
- 3.2. Note the parking enforcement contractor's performance in paragraph 7.
- 3.3. Note the annual financial performance as set out in paragraph 8.
- 3.4. Agree the scope of the Parking Policy Review in paragraph 9.

4. Background and Policy Context

Background

- 4.1. The 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
 - Focus on customer needs
- 4.2. The Council's parking policy has to balance the needs of those living, working, visiting and trading in the borough as well as ensuring that the cost of parking controls is met. Complicating matters further is the significant demand for parking spaces, along with the need to reduce the 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 managing these issues.
- 4.3. The 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 as far as practicable having regard to matters set out in S122 (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'.
- 4.4. This year all parking charges have remained at their current levels. 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 the Council continues to meet the objectives set out above and comply with the requirements of Section 122 Road Traffic Regulation Act 1984.
- 4.5. The Council's fear of becoming a 'car park' for commuters remains very real. 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 just inside zone 2 with cheaper fares and at the end of the Docklands Light Railway. Added to this is the fact that access to Lewisham and its car parks is relatively easy for commuters driving into London but becomes more difficult the further into London they travel as travel times increase. The expansion of the Ultra Low Emission Zone (ULEZ) in 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. However, the extent to which this is likely to be a problem is currently being assessed in conjunction with TfL.

- 4.6. Using its powers 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 from stakeholders were in favour of parking controls.
- 4.7. In line with the policy review recommendations the Council has refreshed all parking policies and collated them into an integrated and an accessible parking policy document which is now available on the Lewisham website: <u>https://lewisham.gov.uk/myservices/parking/parking-reports-and-policies</u>

National Context

- 4.8. The key legal framework underpinning parking includes the Road Traffic Regulation Act 1984 and The Traffic Management Act 2004. These impose duties on local authorities to manage all on-street, off-street and their road network so as to reduce congestion and disruption and includes enforcement powers.
- 4.9. There are other London specific legislation under the various London Local Authorities Acts which are also relevant for parking.

Local Context

- 4.10. Each London borough is required by the Greater London Authority Act to prepare a Local Implementation Plan (LIP) to implement the Mayor of London's Transports Strategy within their area.
- 4.11. The Lewisham Transport Strategy & LIP 2019-2041 takes the Mayor of London's Transport Strategy and tailors them to the Lewisham context, shaped by the vision outlined in the borough's Sustainable Community Strategy and the spatial planning policies in the Local Development Framework.
- 4.12. Following a comprehensive review of parking policies in the Borough the London Borough of Lewisham published its first Parking Policy in 2014. This has since been updated, with an update agreed at Mayor & Cabinet in 2019/20.

5. Overview of Parking in the borough

- 5.1. There are a variety of parking places across the borough, including 1,441 parking spaces in the 13 Council's off street public car parks and an estimated 20,000 parking spaces in marked on street parking bays.
- 5.2. There are various parking restrictions, including yellow lines, restricted parking zones and CPZs which rely on a permit system.
- 5.3. The total number of CPZs operating in the borough at the end of 2018-19 was increased from 22 to 23 following the implementation of the Zone DS CPZ area during November 2017.

- 5.4. 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.
- 5.5. Electric Vehicle Charging Points (EVCP) are a key measure to support the Council's Air Quality Action Plan. By end of 2018/19 there were 28 EVCPs in 10 locations, including 17 charging points installed in 5 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.

6. Controlled Parking Zone Programme Update

Tranches 1-2

- 6.1. Between 2014/2015 and 2017/18, the Council implemented the first two tranches of the CPZ Programme, following consultation. The following CPZs were implemented:
 - New Lee Green West CPZ May 2016
 - CPZ extension in Ladywell implementation December 2016
 - New CPZ in Mountsfield Park implementation October 2016
 - New CPZ Deptford South

Review of existing Lee Green CPZs – implementation October 2015

- 6.2 There was found to be insufficient support for a CPZ in the following areas
 - Perry Vale East (Catford Stations)
 - Brockley
 - Forest Hill

Tranche 3

- 6.2. Following a new assessment made under the criteria and methodology described in the parking policy, the Tranche 3 CPZ programme was approved in March 2018, with work commencing during the 2018/19 financial year.
- 6.3. The CPZ Programme has been scored and prioritised on the basis of policy criteria to ensure that the most urgent problems are addressed first. Each criterion is weighted to reflect the local demand for a CPZ, as well as the technical need for a CPZ.
- 6.4. The CPZ Programme for Tranche 3 comprises four separate consultation schemes which have been deemed the highest priority using the above methodology. This programme is subject to annual review against the policy criteria. Consultation boundaries are subject to agreement with local councillors.

New CPZs and review of existing CPZ

- 6.5. The following areas have been included in Tranche 3 for consultation as to whether a CPZ is wanted or needed by local residents and businesses.
- 6.6. Ladywell CPZ area Following consultation undertaken in June 2018, the decision was made to implement a new CPZ to include a group of streets to the west of the existing Zone T CPZ which expressed overall support and met policy criteria. Implementation of the new CPZ LW commenced during March 2019 and the CPZ went live during April 2019.
- 6.7. Leegate area new CPZ (East of Zone LG). There have been a number of requests and local support for a new CPZ in this area, which may be reflective of displacement from neighbouring CPZs such as Zone LG. This area is included in the Healthy Neighbourhood programme as part of the Lewisham and Lee Green area and consultation will be coordinated with that programme during 2019/20
- 6.8. **Grove Park review and extension of Zone D.** Consultation is planned to take place in 2019/20 to determine if there is support for a reduction in the operational hours of the zone and establish if improvements to the zone layout, including location and type of parking bays or waiting restrictions, may be needed. There has been some interest expressed from residents in neighbouring streets regarding the installation of CPZ controls and the consultation will also be used to establish if there is overall support for an extension of the CPZ area.
- 6.9. **Sydenham area new CPZ.** There is evidence of local support for a CPZ in this area following requests made by local residents. Parking stress surveys suggest that the area could benefit from CPZ controls.
- 6.10. The Tranche 3 CPZ consultation programme received approval from the Executive Director for Resources and Regeneration in March 2018. Consultation commenced in the 2018/19 programme starting with the Ladywell CPZ review. Expected timescales are provided in the following table. For each area, a new CPZ, or in the case of Grove Park, amendment of an existing CPZ would only be approved should they be supported by the consultation. Should this not be the case, the next consultation may be brought forward.

	Informal	Statutory	
Area	Consultation/Design	Consultation/Design*	Implementation*
Ladywell area	Spring 2018	Summer 2018	Spring 2019
Leegate area	Autumn 2019	Winter 2019/20	Spring 2020
Grove Park	Winter 2019/20	Spring 2020	Summer 2020
(Zone D review)	Winter 2019/20	Spring 2020	Summer 2020
Sydenham area	Spring 2020	Summer 2020	Autumn 2020

*These steps only apply should a new or amended CPZ be supported following consultation. If this is not the case, the following consultation may be brought forward.

New Developments and CPZs

6.11. Additionally, CPZ consultations in other areas where development has/will take place are often funded by agreements under Section 106 of the Town and Country Planning Act 1990. These CPZs will be proposed to mitigate against the impact of additional parking associated with the new developments. In some areas, the impact of developments are beginning to be realised in neighbouring areas, and in some cases the monies secured for the purpose of CPZ review and implementation must be spent before the expiry date specified on the S106 agreement. These potential CPZs areas related to developments are therefore not assessed against the standard policy criteria, but require separate approval from Mayor and Cabinet.

Minor parking projects

- 6.12. The Council receives a number of requests for the implementation of new waiting and loading restrictions or other small changes to parking provision. The majority of these requests are for yellow line restrictions at junctions and bends to ease access and/or improve road safety.
- 6.13. The introducing of such restrictions is associated with consultation on and changes to a Traffic Management Order (TMO). Following consultation towards the end of 2017-18 and further consultation during 2018-19 new restrictions were provided at more than 50 locations.

7. Parking Enforcement Activities and Contract Performance

Parking Enforcement Activities

- 7.1. The total number of Penalty Charge Notices (PCNs) issued by Lewisham in 2018-19 was 7.5% higher than the year prior.
- 7.2. Within Lewisham this increase is as a result of a focus on more serious contraventions, increase enforcement in new CPZs and more intelligent parking deployment to reflect changing demands. PCNs for moving traffic contraventions remain fairly consistent compared to last year.

Lewisham PCNs	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Parking Contraventions	47,607	42,724	36,195	47,313	52,213*	53,756
Moving Traffic Contraventions	15,857	17,382	20,869	23,156	23,259**	27,687
Total PCNs issued	63,464	59,482	57,064	70,469	75,472	81,443

Data based on 1st April 2018 – 31st March 2019 *SIDEM "Case Summary by Contravention Details", filtered to TMA CCTV and TMA HH. **SIDEM "Case Summary by Contravention Details", filtered to RTA CCTV Moving and RTA Bus Lane

7.3. The total number of cases passed to enforcement agents for debt recovery in 2018-19 was 6% higher than last year.

Parking Permits

- 7.4. The total number of resident and business parking permits purchased in 2017-18, 17,922, was 2% higher than the previous financial year.
- 7.5. Visitors' permits increase 41% against the previous financial year due to the growth of CPZs within the Borough

Permits	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Resident	6,620	11,708	12,921	14,116	15,793	15,999*
Business	367	505	522	544	1,759	1,923**
Visitor	26,885	55,643	66,628	80,542	89,439	125,925***
Total	33,872	67,856	80,071	95,202	106,991	143,821

Data based from RingGo Operational "Monthly Permits" report

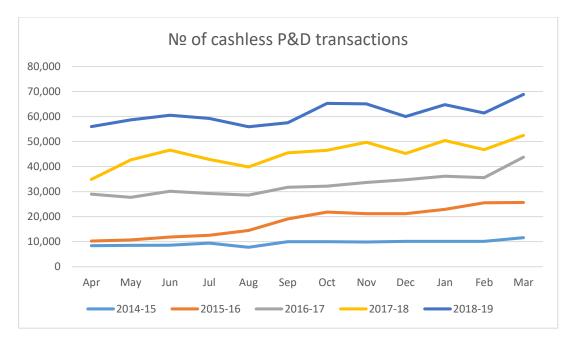
*Resident, Resident Disabled, Resident Health, Resident Low Emission

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

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

Pay & Display and Cashless

- 7.6. From August 2015 the Council introduced a cashless parking system across the Borough which allows the user to pay for their parking via their smartphone via the RingGo app (cashless P&D subcontractor). This system continues to operate alongside pay and display machines and as a standalone system in new CPZs.
- 7.7. The growth in cashless transactions has continued since 2014-15, and in 2018-19, transactions were 35% higher than the previous financial year.



- 7.8. In addition, the Council has 174 P&D machines for cash transactions across the borough's on-street parking locations. Many are now very old, and some are beyond repair (i.e. parts no longer available, or the costs are no longer viable).
- 7.9. A review was undertaken in June 2019, to trial decommissioning those P&D machines at on-street locations that take in less than £30/week. Of this, 98 P&D machines have been earmarked for the trial, which leaves 174 on-street P&D machines still operating. Where machines have been decommissioned under this trial, they have been given the facilities to pay for their parking using the cashless RingGo system.
- 7.10. This program will continue to monitor performance of the P&D machines with a view to further decommissioning of underperforming machines, or where repairs are no longer viable.

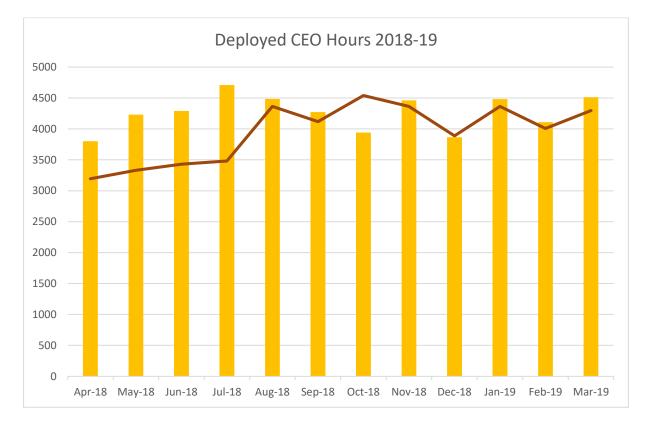
Parking Contract Performance

- 7.11. The Council's Parking Enforcement Services is contracted to NSL Ltd. Mayor and Cabinet approved in January 2019 the extension of the contract for a further 4 years until 30th April 2023.
- 7.12. The parking contract covers a number of services split into 4 broad categories:
 - Parking Enforcement
 - Pay & Display Maintenance & Cash Collection
 - Penalty Charge Notice Processing
 - Permits & Suspensions
- 7.13. Responses to formal representations and appeals are authorised by Council staff and the contract is managed using a number of Key Performance Indicators (KPIs). There are 4 categories of KPIs:

- Effective Parking Enforcement;
- Good Quality, Motivated and Informed Civil Enforcement Officers;
- Issue of Good Quality PCNs; and
- Other Services (such as ICT, suspensions, signs and lines & complaints)

Effective Parking Enforcement

7.12. Civil Enforcement Officers (CEOs) deployment levels remained fairly consistent throughout the year. There was shortfall in October for which the contractor has been penalised. The Council is looking to increase deployment in 2019-20 to cover the introduction of new CPZ's and requests for additional enforcement from Members.

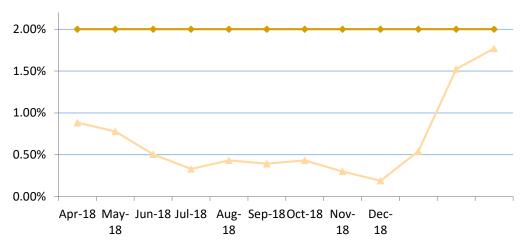


Good Quality, Motivated and Informed Civil Enforcement Officers

7.14. 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 very nature of the work involved. The turnover in 18-19 was 28%.

Issue of Good Quality PCNs

7.15. To ensure quality is maintained throughout contract delivery, the performance target is to maintain the CEO error rate below 2%. Performance against this KPI is excellent. See graph below.



CEO Error Cancellations

Notice Processing

The issue and challenge of a PCN follows a statutory process that allows the right of appeal to the independent London Tribunals – Environment and Traffic Adjudicators.

7.16. The table below shows the annual appeal results as reported by the Environment and Traffic Adjudicators. (ETA). The performance has improved considerably and the results from London Councils has highlighted that Lewisham is 2nd in London which is a great achievement.

Appeals	2015/16	2016/17	2017/18	2018/19
Total	573	385	566	555
Upheld	135	116	168	148
Rejected	293	247	419	407
DNC	32	31	42	46
Success (%)	63.70%	62.69%	74%	73%

7.17. Complaints against service delivery (not the issue of PCNs which follows the statutory process mentioned above) are managed via the Council's complaints procedure.

Complaints	2015/16	2016/17	2017/18	2018/19
Total	109	98	101	198
Overdue	5	14	33	28

Service Development

In 2018-19 the Council is planning to introduce the following:

- Implementation of CCTV Camera in Catford Broadway
- Implementation of New KPI's for the Enforcement Contract
- 10

- Development of specification for new IT system
- Development of Emission based charges for all permit types
- Rationalisation of Pay and Display machines
- Improved enforcement around schools and introduction of additional CCTV
 enforcement cameras

8. Financial Performance

- 8.1. This section of the report sets out information relating to parking finances.
- 8.2. Parking charges are fixed in accordance with the requirements of the *Road Traffic Regulation Act 1984* and there have been no changes since the last Annual Parking Report was published. In addition the cost of Parking Permits and Suspensions has also not changed since last year's report.
- 8.3. Section 8.5 shows the final results for the financial year 2018-19, summarising the performance against budget relating to both off-street and on-street parking.
- 8.4. Section 8.9 also sets out the Council's Parking Control Account for 2018-19. This account is a statutory requirement and sets out the financial position in relation to on-street parking only. The 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

8.5. In 2018-19, the Council collected £9.9m income in respect of parking services, compared to a budget of £8.32m. The income received can be broken down as follows:

Parking services - net income collected in 2018-19			
	£000s	%	
PCNs	4,804	48	
P&D	2,462	25	
Permit	2,327	24	
Suspensions	327	3	
Total Income 2018-19	9,920	100	

Direct parking management expenditure		
	£000s	
Enforcement contract costs	2,565	
Management and admin costs	835	
Car park utilities, rates, repairs and maintenance	337	
Legal fees	146	
Provision for bad debts		

Total expenditure 2018-193,883

Parking Control Account 2018/19

- 8.6. 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 <u>schedule 7 to the Traffic Management Act 2004</u>.and after each financial year to report to the Mayor of London on any action taken by it in accordance with the provisions of the Act in relation to any surplus or deficit in the account.
- 8.7. 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.
- 8.8. If, however, it is considered unnecessary or undesirable to provide further offstreet parking in this area, the surplus may then be used to fund any of the following:
 - 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.
- 8.9. The Council's Parking Control Account for 2018-19 is summarised below:

Borough Parking Control Account 2018-19			
	£000s	%	
On-street Parking gross income			
Pay and Display	1,783	23	
Permits	1,855	23	
PCN	4,323	54	
Total Income	7,961	100	
On-Street Parking expenditure			
Enforcement contract costs	2,308	51	
Management, admin and overheads	1,501	33	
Running costs	435	10	
Capital investment	255	6	
Total Expenditure	4499	100	

Funds available for supporting highways	3,462	
and transportation		

9. Parking Policy Review

- 9.1 Following a comprehensive review in 2012/13, a report to Sustainable Development 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
 - Improve the customer journey for residents and businesses for permit application.

9.2 The review was carried out during the 2019-20 financial year.

10. Financial implications

- 10.1. 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 to members agreeing the recommendations set out in section 3.
- 10.2. Details of the Council's financial performance in terms of the parking service are set out in section 8 and comply with both the Road Traffic Regulation Act, 1984 and the The Local Government Transparency Code 2015 published by the Ministry of Housing.

11. Legal Implications

- 11.1. 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.
- 11.2. 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 <u>Annex A</u> to the Guidance.
- 11.3. 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.

- 11.4. 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.
- 11.5. In fulfilling the general duty imposed by Section 122 RTRA, the matters referred to above are as follows:-

(a) The desirability of securing and maintaining reasonable access to premises;

(b) the effect on the amenities of any locality and 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;

(b) the national air quality strategy

(c) 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

(d) any other matters appearing to the Council to be relevant.

- 11.6. 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).
- 11.7. 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:-
 - (a) the making good of shortfalls in the last 4 years

(b) the provision and maintenance of off street parking by the council or others

- (c) if further off street parking appears unnecessary or undesirable then (i) meeting the cost of provision, operation or facilities for public transport services; and
 - (ii) highway or road improvement projects in the area.

11.8. 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.

- 11.9. 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 timelimits at places where vehicles may park or wait, in respect of vehicles displaying a disabled person's badge.
- 11.10. 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.
- 11.11. 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.
- 11.12. 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.
- 11.13. 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.
- 11.14. These are often referred to as the three aims of the general equality duty.
- 11.15. 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.
- 11.16. 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.

12. Crime and Disorder Implications

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

13. Equalities Implications

- 13.1. Compliance with the Equality Duty, as described in the 'Legal Implications' of this report has been incorporated within a more detailed Equalities Analysis Assessment which formed part of the Review of Parking Policy report agreed by Mayor and Cabinet on 10 April 2013.
- 13.2. 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.
- 13.3. 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.
- 13.4. 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.
- 13.5. 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.

14. Environmental Implications

14.1. There are no direct implications arising from this report, but the policy review will into account the Council's broader ambitions for environmental sustainability such as air quality. For instance, its Local Implementation Plan

(LIP) aims to reduce growth in road traffic through the discouragement of car usage and the promotion of facilities for cyclists and pedestrians and alternative sustainable methods of transport. The limitation of on-street parking through CPZs, especially around shopping centres and transport hubs along with appropriate charging is considered to be a deterrent to car usage.

15. Conclusion

- 15.1. This report provides an update on the London Borough of Lewisham's Parking activities for 2018/19.
- 15.2. Overall the combination of Parking Policy, Parking Enforcement contract and CPZ Programme are performing well in meeting the challenges of parking across the Borough.