



## Mayor and Cabinet

### Introduction of emission-based short-stay parking charges and motorcycle parking charges

**Date:** 14/07/2021

**Key decision:** Yes

**Class:** Part 1

**Ward(s) affected:** All

**Contributors:** Seamus Adams, Xyra Davies

### Outline and recommendations

This report seeks approval to introduce emission-based short-stay parking, to align with emission-based permit charges in the borough, and to move to a fully cashless regime for short-stay parking. This report also seeks approval to move to consultation with the public regarding the implementation of motorcycle parking charges throughout the borough.

It is recommended that the Mayor and Cabinet:

- Approve the introduction of emission-based short-stay parking charges to align with all other permits currently issued throughout the borough, subject to statutory consultation via the Traffic Management Order process, as set out in Section 4.6
- Approve a public consultation regarding the introduction of motorcycle parking charges, to take place in August 2021 for 12 weeks. Details of the consultation can be found in Section 5
- Approve that the results of the consultation (and any objections) be delegated to the Executive Director of Housing, Regeneration and the Public Realm for sign off and implementation
- Approve a requirement for motorcycles to hold a valid permit to park in any permit holder bay, which will be charged based on emissions, subject to public consultation, as set out in Section 4.7 (4.7.4 – 4.7.8)
- Approve a requirement for visitors travelling by motorcycle to display either a visitor permit under the current charging system when visiting friends and family, or purchase a cashless parking session when parked in short-stay bays, which will be charged based on emissions, subject to public consultation, as set out in Section 4.7 (4.7.9 – 4.7.12)
- Approve moving to a fully cashless system for short-stay parking within the borough, as set out in Section 4.8
- Consider the comments received from the Sustainable Development Select Committee meeting held on 30<sup>th</sup> June

## Timeline of engagement and decision-making

### Introduction of emission-based short-stay parking

30 June 2021 – Sustainable Development Select Committee (SDSC) proposal comments

August/September 2021 – Advertise amendment of Traffic Management Order – notice of proposal (21 days)

September 2021 – Decision report based on notice of proposal outcome

October 2021 – Advertise amendment of Traffic Management Order – notice of making

October 2021 – Implement changes to Traffic Management Order

### Introduction of motorcycle parking charges

30 June 2021 – Sustainable Development Select Committee (SDSC) proposal comments

July 2021 – Mayor and Cabinet consultation approval

August 2021 – Consultation Launch

August-November 2021 – Consultation (12 weeks)

November 2021 – Delegate report to the Executive Director on outcome of consultation

## 1. Summary

- 1.1. The purpose of this report is to present key proposals to be taken forward to public consultation, and to propose measures that align with the Council's Air Quality Action Plan.
- 1.2. On 15 January 2020, the Mayor and the Cabinet agreed upon the updates to the Parking Policy, including the implementation of emission-based permits.
- 1.3. It is proposed that the Council builds on this, introducing emission-based short-stay parking, to align with the borough's aims to be carbon neutral by 2030.
- 1.4. This report also proposes the introduction of parking charges for solo motorcycles in resident, business, shared use, and Pay & Display bays. Solo motorcycles currently park free of charge in these bays throughout the borough.
- 1.5. A review of Pay and Display machines is proposed, in order to potentially move to a fully cashless regime.
- 1.6. Following approval from the Mayor and the Cabinet in July 2021, public consultation regarding motorcycle permits would take place August 2021, and would last for 12 weeks. The results of the consultation would then be brought back to the Sustainable Development Select Committee (SDSC) for comment, before the final amendments are agreed by the Mayor and the Cabinet.

## 2. Recommendations

- 2.1. It is recommended that the Mayor and Cabinet:
  - Approve the introduction of emission-based short-stay parking charges to align with all other permits currently issued throughout the borough, subject to statutory consultation via the Traffic Management Order process, as set out in Section 4.6.

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- Approve a public consultation regarding the introduction of motorcycle parking charges, to take place in August 2021 for 12 weeks. Details of the consultation can be found in Section 5.
  - Approve that the results of the consultation (and any objections) be delegated to the Executive Director of Housing, Regeneration and the Public Realm for sign off and implementation.
  - Approve a requirement for motorcycles to hold a valid permit to park in any permit holder bay, which will be charged based on emissions, subject to public consultation, as set out in Section 4.7 (4.7.4 – 4.7.8).
  - Approve a requirement for visitors travelling by motorcycle to display either a visitor permit under the current charging system when visiting friends and family, or purchase a cashless parking session when parked in short-stay bays, which will be charged based on emissions, subject to public consultation, as set out in Section 4.7 (4.7.9 – 4.7.12).
  - Approve moving to a fully cashless system for short-stay parking within the borough, as set out in Section 4.8.
- 2.2. On Wednesday 30<sup>th</sup> June 2021, this report was presented to the Sustainable Development Select Committee (SDSC), who noted and provided comment on the above recommendations (the agenda and reports for that meeting can be found [here](#)). The committee considered this report alongside a presentation from a senior officer, and subsequently agreed to pass its views on to Mayor and Cabinet.
- 2.3. The Mayor and Cabinet are invited to consider the comments received from the SDSC meeting held on 30th June. The SDSC's recommendations will be set out in an Addendum to this report.

### 3. Policy Context

- 3.1. In October 2014, the Mayor and the Cabinet approved the Council's current Parking Policy, and it was agreed that the policy would be updated in 2018/19 to bring the policy in line with legislation.
- 3.2. Since the Parking Policy was approved, Lewisham declared a Climate Emergency in February 2019, and a Parking Policy update proposal, to implement emission-based permits, was put forward to the Mayor and the Cabinet. In January 2020, the Mayor and the Cabinet approved the proposed changes to the policy, including the implementation of emission-based permits.
- 3.3. The next step is to introduce emission-based short-stay parking charges, for all motorists who park in short-stay parking bays. This way, we harmonise the permit and short-stay parking charges by ensuring that all charges are based on emissions, in an effort to improve air quality throughout the borough.
- 3.4. In addition, currently motorcycles do not pay to park in Lewisham. To align with these strategies, the introduction of motorcycle parking charges is proposed. These would also be emission-based, to harmonise with the charges for other motor vehicles and the Council's aims to improve air quality.
- 3.5. The implementation of emission-based short-stay and motorcycle parking charges aligns with TfL's wider policy, with the introduction of the Ultra-Low Emission Zone (ULEZ), which will be introduced in the inner London area in October 2021.
- 3.6. The Greater London Authority (GLA) published the London Plan in March 2021. Within this plan, it stated that the "mental and physical health of Londoners is, to a large

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extent, determined by the environment in which they live”.<sup>1</sup> Among other things, air quality and climate change can have a significant impact on Londoners’ health.

- 3.7. One of the aims within this plan is to create a healthy city, and it states that in order to improve Londoners’ health and reduce health inequalities, those involved in planning and development must “prioritise health in all planning decisions” and “seek to improve London’s air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution”.<sup>2</sup>
- 3.8. The recommendations set out in this report align with the GLA’s London Plan, as these proposals seek to improve air quality by:
- charging all vehicles in the borough to park based on their emissions; and
  - moving to a fully cashless system to implement these charges.
- 3.9. In line with Lewisham Council’s Single Equality Framework (2020-24) objectives, these proposals aim to “improve the quality of life of residents by tackling preventable illnesses and diseases”.<sup>3</sup> With the implementation of measures to monitor carbon emissions in the borough, the aim is to improve the general health and wellbeing of Lewisham residents.
- 3.10. These proposals also support the Council’s strategic objectives (2018-22), particularly objectives 5 and 6:
- 5. Delivering & defending: Health, Social Care and Support – Ensuring everyone receives the health, mental health, social care and support services they need.
  - 6. Making Lewisham Greener – Everyone enjoys our green spaces and benefits from a healthy environment as we work to protect and improve our local environment.<sup>4</sup>

## 4. Background

- 4.1. Previously, the Mayor and Cabinet approved the introduction of emission-based permits for motor vehicles throughout the borough. This was approved on 15 January 2020, and was implemented later that year. Consideration was also given to the introduction of emission-based short-stay parking charges. However, at that time, the technology to implement this was not available.
- 4.2. Throughout the borough, short-stay parking is charged at a standard rate of £2.00 per hour. This means that currently those with higher-polluting vehicles pay the same rate as those with lower-polluting vehicles. Emission-based short-stay parking charges would bring short-stay parking charges in line with the Council’s current parking policy.
- 4.3. Now, with the introduction of e-permits, the Council is also proposing to introduce permits and short-stay parking charges for motorcycles. With an e-permit, motorcyclists would be able to park without the fear of incurring a PCN due to a stolen or lost permit. If approved, motorcyclists wishing to park in paid-for parking bays will either require a permit or a cashless parking session.
- 4.4. **Air quality and pollutants**

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<sup>1</sup> [Greater London Authority – London Plan March 2021](#)

<sup>2</sup> See above reference.

<sup>3</sup> [Lewisham Council Single Equality Framework \(2020-24\)](#)

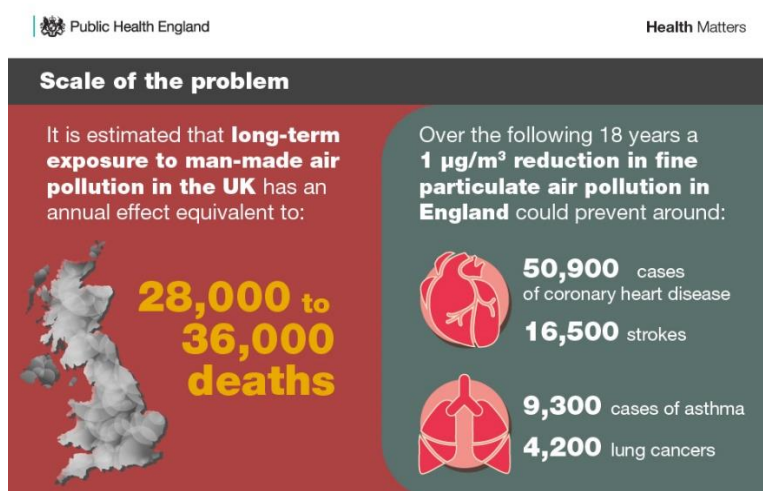
<sup>4</sup> [Lewisham Council Corporate Strategy \(2018-22\) webpage](#)

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- 4.4.1. Poor air quality is the largest environmental risk to public health in the UK. Long-term exposure to air pollution can cause chronic conditions such as cardiovascular respiratory diseases, and lung cancer. This leads to a reduced life expectancy, according to Public Health England.
- 4.4.2. Air pollutants are emitted from a range of both man-made and natural sources. Many everyday activities such as transport, industrial processes, farming, energy generation and domestic heating can have a detrimental effect on air quality.
- 4.4.3. The UK Health Forum and Imperial College London, in collaboration with and funded by Public Health England, developed a modelling framework, and estimated that a 1  $\mu\text{g}/\text{m}^3$  reduction in fine particulate air pollution in England could prevent around 50,000 cases of coronary heart disease, 16,500 strokes, 9,300 cases of asthma and 4,200 cases of lung cancer over an 18-year period.

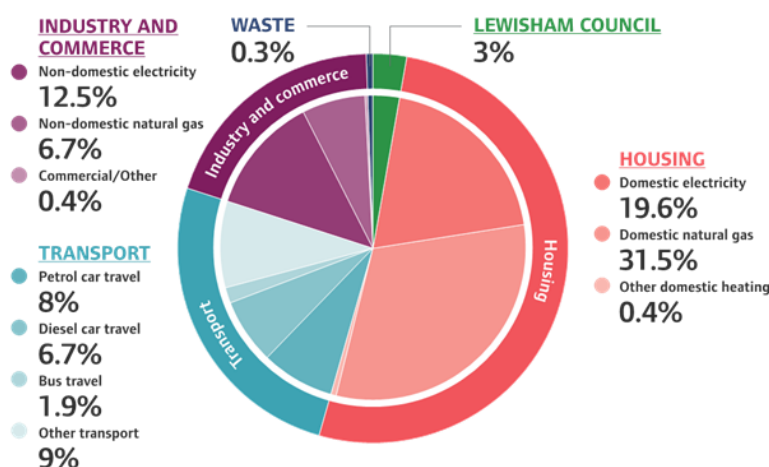


An infographic from Public Health England about how air pollution impacts health.

- 4.4.4. This highlights the need for improvement and supports the introduction of emission-based charges, in an effort to improve air quality.

#### 4.5. Carbon emissions in the borough

- 4.5.1. Emission-based resident and business permits for motor vehicles were approved by the Mayor and the Cabinet on 15 January 2020. This did not include motorcycles, which currently park free of charge all parking bays throughout the borough.
- 4.5.2. The chart below shows the sources of carbon emissions in the borough.



A pie chart showing the source of carbon emissions throughout the borough.

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- 4.5.3. Petrol vehicles cause 8% of all carbon emissions in the borough, while diesel vehicles cause 6.7% of all carbon emissions in the borough. As most motorcycles are fuelled by petrol, they can be included in the petrol section above. They are currently allowed to park free of charge anywhere throughout the borough.
- 4.5.4. Having implemented emission-based resident and business permits throughout the borough, it is now worth considering visitors to the borough, and how we might reduce the emissions from these vehicles, too. This will also align with the TfL ULEZ policy, in that vehicles that produce higher emissions will be charged more to park, which will encourage the take-up of lower emissions vehicles.
- 4.5.5. This highlights the need for improvement and supports the introduction of emission-based charges, in an effort to improve air quality.
- 4.6. **Proposed emission-based charging for short-stay parking**
- 4.6.1. The current charge per hour in Lewisham is £2.00 per hour.
- 4.6.2. To align with current emission-based charging for Resident and Business permits, this report proposes to charge for short-stay parking based on a vehicle's emissions.
- 4.6.3. Those with the lowest emissions throughout the borough will see the charge for short-stay parking drop to £1.50 per hour, while the most polluting vehicles will see short-stay parking charges rise to £3.50.
- 4.6.4. A diesel surcharge of £2.00 will also apply. The full proposed charges can be found in the table below:

Proposed emission-based charges for short-stay parking (cars and vans)						
Emissions	Up to 100 CO <sub>2</sub> g/km	Up to 130 CO <sub>2</sub> g/km	Up to 165 CO <sub>2</sub> g/km	Up to 200 CO <sub>2</sub> g/km	Up to 256+ CO <sub>2</sub> g/km	Non Euro 6 compliant
Cost	Band 1	Band 2	Band 3	Band 4	Band 5	Diesel surcharge
	£1.50	£2.00	£2.50	£3.00	£3.50	£2.00

**Proposed emission-based charges for short-stay parking in Lewisham**

- 4.6.5. The table attached in Appendix 1 shows a projection of the income that will be generated from the above emission-based short-stay parking charges, along with the different types of vehicles that fall into each band. Appendix 1 illustrates one month's data, extrapolated using the percentage of each type of vehicle in the borough to provide an indication of the potential income that the Council will generate.
- 4.6.6. In order to implement the above changes, the Council is also proposing to move to a fully cashless system, whereby individuals will use the PayByPhone app or telephone number to book a short-stay parking session. The full recommendation for this is set out in section 4.8.
- 4.6.7. The proposed implementation plan for emission-based short-stay parking is set out below:
- August/September 2021 – Advertise Traffic Management Order – notice of proposal (21 days)
  - September 2021 – Decision report based on notice of proposal outcome
  - October 2021 – Advertise Traffic Management Order – notice of making
  - October 2021 – Implement changes to Traffic Management Order

**Emission-based short-stay parking recommendation:**

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- **Recommendation 1** – Approve the introduction of emission-based short-stay parking charges to align with all other permits currently issued throughout the borough, subject to statutory consultation via the Traffic Management Order process

#### 4.7. **Proposed motorcycle parking charges**

- 4.7.1. Currently, motorcycles park free of charge in any permit holder or short-stay bay throughout the borough. Motorcycles have been found to emit harmful pollutants such as Carbon Dioxide (CO<sub>2</sub>), Nitrogen Oxides (NO<sub>x</sub>) and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>). These pollutants have a negative effect on health, as stated in section 4.4.
- 4.7.2. Therefore, the introduction of motorcycle parking charges will help mitigate the negative impact on residents' health, and will bring motorcycles into alignment with other vehicles throughout the borough.
- 4.7.3. As part of the implementation of motorcycle parking charges in the borough, the Council will be undertaking public consultation with relevant internal and external stakeholders. Full details of the proposed consultation, subject to approval from the Mayor and Cabinet, are outlined in section 5.
- 4.7.4. **Emission-based permits for motorcycles**
- 4.7.5. Introducing motorcycle permits aligns motorcycles with all other motor vehicles throughout the borough, as cars and vans are already charged to park in permit holder bays based on their emissions.
- 4.7.6. This also brings Lewisham Council into harmony with several other London boroughs, who have started charging motorcycles to park based on their emissions. Please see Appendix 2 for other London boroughs that currently charge motorcycles to park based on their emissions.
- 4.7.7. There will be a variety of permits available to motorcyclists, including but not limited to Resident, Business and Health permits, and these will align with the current permit mechanism. Motorcycle permits will be charged at 50% of the current cost for cars. All proposed motorcycle emission-based permit charges can be found in Appendix 3.
- 4.7.8. Motorists with electric motorcycles would need to obtain a permit in order to park in permit holder bays. However, this would be free of charge.
- 4.7.9. **Emission-based short-stay parking for motorcycles**
- 4.7.10. Currently, motorcycles park free of charge in short-stay bays, provided they park perpendicular to the kerb. This report proposes to introduce emission-based short-stay parking for motorcycles throughout the borough.
- 4.7.11. Short-stay parking sessions will be available to purchase on the PayByPhone app, by telephone, or at pay point locations.
- 4.7.12. The proposed pricing for emission-based short-stay parking for motorcycles is the same as that for cars and vans, except motorcycles will not pay a diesel surcharge. This is due to the fact that most motorcycles are run on petrol. Below is a table with the proposed motorcycle emission-based short-stay parking charges:

Proposed emission-based charges for motorcycle short-stay parking						
Emissions	Up to 100 CO <sub>2</sub> g/km	Up to 130 CO <sub>2</sub> g/km	Up to 165 CO <sub>2</sub> g/km	Up to 200 CO <sub>2</sub> g/km	Up to 256+ CO <sub>2</sub> g/km	Non Euro 6 compliant
Cost	Band 1	Band 2	Band 3	Band 4	Band 5	Diesel surcharge

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	£1.50	£2.00	£2.50	£3.00	£3.50	£0.00
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4.7.13. The proposed implementation plan for motorcycle parking charges is set out below:

- 30 June 2021 – Sustainable Development Select Committee (SDSC) proposal comments
- July 2021 – Mayor and Cabinet consultation approval
- August 2021 – Consultation Launch
- August-November 2021 – Consultation (12 weeks)
- November 2021 – Results of the consultation (including any objections) to be presented to the Executive Director of Housing, Regeneration and the Public Realm for sign off and implementation

#### **Motorcycle parking charge recommendations:**

- **Recommendation 2** – Approve a public consultation regarding the introduction of motorcycle parking charges, to take place in August 2021 for 12 weeks
- **Recommendation 3** – Approve that the results of the consultation (and any objections) be delegated to the Executive Director of Housing, Regeneration and the Public Realm for sign off and implementation
- **Recommendation 4** – Approve a requirement for motorcycles to hold a valid permit to park in any permit holder bay, which will be charged based on emissions, subject to public consultation
- **Recommendation 5** – Approve a requirement for visitors travelling by motorcycle to display either a visitor permit under the current charging system when visiting friends and family, or purchase a cashless parking session when parked in short-stay bays, which will be charged based on emissions, subject to public consultation

#### **4.8. Proposed cashless short-stay parking**

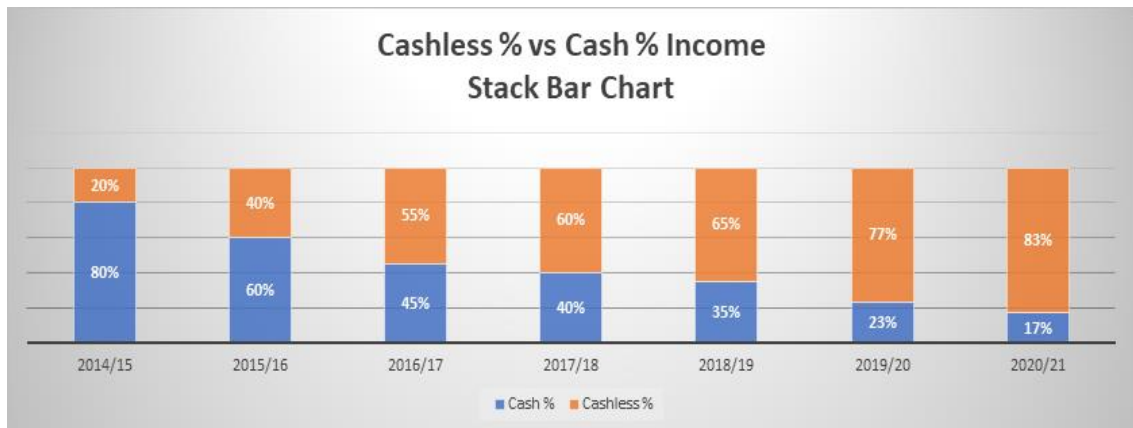
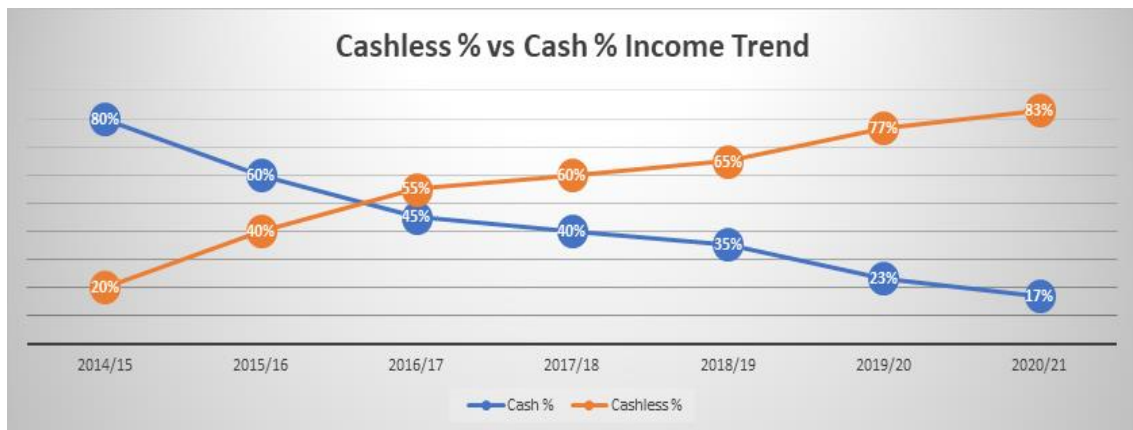
- 4.8.1. There are currently 66 Pay & Display machines remaining throughout the borough. Please see Appendix 4 for a list of these machines, both on- and off-street.
- 4.8.2. The current machines are over 15 years old, and many of them are beyond repair. As well as this, the current software cannot accommodate emission-based short-stay parking. In order to introduce emission-based short-stay parking, the machines would need to be replaced, and this would require a capital upgrade of £330k.
- 4.8.3. Since 2014, short-stay parking has seen a rise in cashless transactions to pay for short-stay parking throughout the borough. Below are two graphs, which show the increased uptake of cashless transactions and the decreased use of cash to pay for short-stay parking:

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- 4.8.4. As we emerge from the pandemic, it is uncertain whether some members of the public may still wish to use cash to pay for parking; however, on the current projections, based on the data since 2014, cash transactions will continue to decrease, and cashless transactions will increase.
- 4.8.5. Moving to a fully cashless regime has a number of benefits, as it eliminates the cost of replacing the 66 Pay & Display machines, which amounts to £330k. A cashless system also aligns with the Council's Air Quality Action Plan, in terms of reducing carbon emissions. The Council and its contractors will no longer need to undertake weekly visits to pay machines to collect cash, or travel to the machines in order to maintain or repair them.
- 4.8.6. Short-stay parking would be available for purchase on the PayByPhone app or by telephone.
- 4.8.7. For the small number of people who still prefer to use cash to pay for their parking, or those without a smartphone, a number of pay points can be set up in shops within 100m of all Pay & Display locations. Please see Appendix 5 for a map of the 171 pay point locations across the borough.

#### **Fully cashless regime recommendation:**

- **Recommendation 6** – Approve moving to a fully cashless system for short-stay parking within the borough

## **5. Consultation**

- 5.1. It is proposed that the Mayor and Cabinet approve a borough-wide consultation regarding the implementation of motorcycle parking charges, including the introduction of motorcycle permits and short-stay parking.

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- 5.2. Subject to approval from the Mayor and Cabinet in July 2021, consultation will be carried out regarding the following recommendations:
- **Recommendation 4** – Approve a requirement for motorcycles to hold a valid permit to park in any permit holder bay, which will be charged based on emissions, subject to public consultation
  - **Recommendation 5** – Approve a requirement for visitors travelling by motorcycle to display either a visitor permit under the current charging system when visiting friends and family, or purchase a cashless parking session when parked in short-stay bays, which will be charged based on emissions, subject to public consultation
- 5.3. This consultation will take place with key internal and external stakeholders to gain a wide view of how the proposed changes to motorcycle parking will affect the borough as a whole:
- Lewisham Council staff
  - All vehicle permit holders – especially motorcycle retail businesses
  - Delivery services such as:
    - Deliveroo
    - Uber Eats
    - Just Eat
    - Pizza Hut
    - Dominos
  - Metropolitan Police
  - Ward forums
  - Members
  - London Councils
  - Transport for London
  - Department for Transport
  - Resident Tenant Associations
  - NSL
  - Motorcycle activist groups
- 5.4. It should be noted that motorcycle groups will have a large vested interest in these proposals. Robust consultation with these groups, and any objections to the proposals, will be considered. This will ensure that the proposals meet the needs of the motorcyclists, along with residents and businesses, and the Council's ambitions to reduce carbon emissions throughout the borough.
- 5.5. The consultation questions and materials would be made available on the Council website from August 2021 for 12 weeks, and would close in November 2021. These would be communicated through the usual Council channels.
- 5.6. As part of the consultation, the Council will question key stakeholders regarding requirements for the secure parking of their motorcycles. This will ensure that the Council considers and prioritises the safety of motorcycles that will be parked in permit holder bays.
- 5.7. Subject to Mayor and Cabinet approval, the results of the consultation (and any objections) would then be delegated to the Executive Director of Housing, Regeneration and the Public Realm for sign off and implementation. An indicative timescale for the introduction of motorcycle parking charges can be found in Section

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## 6. Financial implications

- 6.1. Based on the charges above and the estimated number of residents and business users in the borough, the additional income from emission-based charging for short-stay parking, assumed for a year, would be £300k per annum.
- 6.2. Introducing motorcycle permits is expected to generate in the region of £40k income per annum, and the introduction of emission-based charging for short-stay parking is expected to generate £45k income in 2022/23.
- 6.3. However, the implementation of these proposals will require additional costs of £80k in 2021/22 for staff time to start up, consultation, and traffic order making or amending. It is also worth noting that if a cashless regime is not approved, there will be additional costs of £330k to update the existing 66 pay machines in the borough.
- 6.4. These proposals can be delivered for 2021/22 and will need to align with the procurement and infrastructure required for the proposal for emission-based short-stay parking. Production and delivery times will, as with most current procurement, be subject to delay due to Covid-19. This will mean a later start in 2021/22, with a year of benefits in 2022/23.

## 7. Legal implications

- 7.1. The Road Traffic Regulation Act 1984 (RTRA) sets out the legal framework for providing both on and off street parking, parking permits, traffic management orders and related financial controls.
- 7.2. Section 122 of the Act imposes a duty on the Council to exercise the functions conferred on them by the RTRA as (so far as practicable having regard to the matters specified in S122 (2) 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”.

The matters set out in S122(2) are:

- (a) the desirability of securing and maintaining reasonable access to premises;
  - (b) the effect on the amenities of any locality affected and (without prejudice to the generality of this paragraph) 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;
  - (c) the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
  - (d) 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
  - (e) any other matters appearing to the local authority to be relevant
- 7.3. The Council may vary off-street and on-street parking charges by either making traffic management orders or by notices given pursuant to S35C and 46A. The procedures for making traffic management orders and the form that they should take are set out within the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996. This includes a statutory duty to consult, which will be in addition to any consultation set out in the report.
- 7.4. The Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (England) Regulations 2000 require that orders made under the RTRA include an exemption from

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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.

- 7.5. Section 55 RTRA provides for the establishment of a separate account into which monies raised through the operation of 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 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).
- 7.6. At the end of each financial year any deficit in the account shall be made good out of the general fund and any surplus must be either carried forward to the following year or applied for all or any of a number of specific purposes set out in that section. In London this includes the power to use it towards meeting all or any part of the cost of the doing by the authority in its area of anything which facilitates the implementation of the London transport strategy and which is for the time being specified in that strategy as a purpose for which a surplus may be applied. Case law has confirmed that these powers should not be used for the purpose of generating a surplus but as long as the authority sets its charges for a valid purpose having taken into account all relevant considerations the fact that those charge lead to a surplus would not render the charges unlawful.
- 7.7. The Traffic Management Act 2004 (TMA) is the primary legislation for the management of parking in England. It reinforces the legal duty under the RTRA to ensure the expeditious movement of traffic. Part 6 of the TMA affects parking and is accompanied by statutory and operational guidance documents. Councils are legally obliged to 'have regard to' the former, while the latter sets out the principles underlying good parking management and recommends how this can be achieved.
- 7.8. The main principles advocated in the TMA statutory guidance are:
- managing the traffic network to ensure expeditious movement of traffic, (including pedestrians and cyclists), as required under the Traffic Management Act 2004 Network Management Duty
  - improving road safety
  - improving the local environment
  - improving the quality and accessibility of public transport
  - meeting the needs of people with disabilities, some of whom will be unable to use public transport and depend entirely on the use of a car
  - managing and reconciling the competing demands for kerb space.
- 7.9. The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It 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.
- 7.10. In summary, the Council must, in the exercise of its function, have due regard to the need to:

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- (a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
  - (b) advance equality of opportunity between people who share a protected characteristic and those who do not;
  - (c) foster good relations between people who share a protected characteristic and persons who do not share it.
- 7.11. The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, 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.
- 7.12. The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found [here](#).
- 7.13. The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
  - 1. The essential guide to the public equality sector duty
  - 2. Meeting the equality duty in policy and decision-making
  - 3. Engagement and equality duty
  - 4. Equality objectives and the equality duty
  - 5. Equality information and the equality duty
- 7.14. The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available [here](#).

## 8. Equalities implications

- 8.1. All staff and officers are trained regarding the Equality Act 2010.
- 8.2. There are considerable risks that the actions proposed to limit carbon emissions could, in themselves, disadvantage low income and vulnerable individuals and communities.
- 8.3. The Equality Analysis Assessment can be found below in Appendix 6. In this assessment, we consider the potential impact on motorcyclist groups, those with differing socioeconomic statuses, and those within the protected characteristics groups set out in the Equality Act 2010.
- 8.4. The Equality Act 2010 states the protected characteristics groups as the following:
  - Age
  - Disability
  - Gender reassignment

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- Marriage and civil partnership
- Race
- Religion and belief
- Sex
- Sexual orientation

8.5. The Lewisham Corporate Equality Policy states that we refer to and monitor several of the above protected characteristic groups differently to the Equality Act.<sup>5</sup> The 'Marriage and civil partnership' characteristic is only protected in employment settings, and not used in resident consultation, so this characteristic will be removed. The terminology used by Lewisham Council is as follows:

- Age
- Disability
- Gender identity (rather than 'reassignment')
- Pregnancy and maternity
- Ethnicity (rather than 'race')
- Religion and belief
- Gender (rather than 'sex')
- Sexual orientation

8.6. The above stated terms will be used throughout the Equality Analysis Assessment and when any referral is made to the protected characteristic groups.

8.7. The Public Sector Equality Duty states that a public authority "must, in the exercise of its functions, have due regard to the need to—

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (Equality Act 2010, Section 149.1.a, 149.1.b, 149.1.c)"

8.8. With regards to the introduction of motorcycle permits, there is a legal obligation to exempt Disabled Badge Holders. The Council must ensure no unconscious bias regarding motorcycle users, as they may hold a Disabled Badge, and exemptions from the proposed parking charges must be granted for these motorists.

8.9. As well as those who hold a Disabled Badge, people who use their motorcycle for business (for example, Deliveroo drivers), commuters who use a motorcycle, and resident motorcyclists must also be considered during the consultation. The impact on these groups must be taken into consideration when making a decision regarding the introduction of motorcycle permits, as these are the most affected groups.

8.10. Regarding the proposals to introduce a cashless regime, there is a risk that some members of the community may not own a smartphone, and therefore would not be able to purchase parking. However, to pay due regard to this group of people, and to mitigate this issue, pay points will be set up in shops. This will allow those individuals to

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<sup>5</sup> [Lewisham Council Corporate Equality Policy](#)

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pay for their parking using cash.

- 8.11. As well as those within the protected characteristics groups, people within the borough whose first language is not English must also be considered with the changes to parking. It must be clearly communicated that these changes are taking place.
- 8.12. Following the proposed consultation, the Council will undertake an Equalities Analysis Assessment to ensure that “due regard” has been given to the protected characteristics groups.

## **9. Climate change and environmental implications**

- 9.1. The Council is legally required to work towards air quality objectives under the Environment Act 1995. Lewisham Council’s Air Quality Action Plan (2016-2021) outlines how the Council will implement these objectives, and the proposed changes align with the Council’s overall objectives.
- 9.2. Following the introduction of emission-based charging for parking permits, emission-based short-stay parking charges harmonise charges throughout the borough, and ensure that the Council is monitoring the emissions of all vehicles that pass through the borough. This also aligns with TfL’s wider policy, with the introduction of the ULEZ in October 2021.
- 9.3. The introduction of motorcycle permits brings motorcycles into line with other motor vehicles throughout the borough. Therefore the proposed policies are expected to have a positive impact on the environment, as emissions will be monitored for all vehicles for the first time.
- 9.4. Based on the need to meet the Council’s climate change agenda, it is recommended that this strategy is progressed to consultation.

## **10. Crime and disorder implications**

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

## **11. Health and wellbeing implications**

- 11.1. These proposals aim to deliver a range of health and wellbeing benefits to residents. Improving air quality will in turn reduce the risk of cardiovascular diseases and lung cancer.
- 11.2. As well as this, the improvement of air quality will therefore reduce the pressure on the NHS, as the aim of these proposals is to improve the general health and wellbeing of residents in the borough.

## **12. Background papers**

- 12.1. [Motion to Declare a Climate Emergency Action Plan – Cllr Anwar and Cllr Krupski – February 2019](#)
- 12.2. [Parking Policy Update – proposals for consultation – March 2019](#)
- 12.3. [Parking Policy Update – results of consultations and recommendations – January 2020](#)
- 12.4. [Mayor and Cabinet’s Climate Emergency Action Plan – March 2020](#)
- 12.5. [Climate Emergency Action Plan Update for the Sustainable Development Select Committee – Jan 2021](#)
- 12.6. [Climate Emergency Action Plan Update for the Mayor and the Cabinet – March 2021](#)

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## 13. Glossary

13.1. The table below lists definitions of a number of terms used throughout the report that the reader may find useful.

Term	Definition
Carbon Dioxide (CO <sub>2</sub> )	The heavy, colourless gas that is formed when carbon is burned. Fossil fuels contain carbon, and when burned, produce carbon dioxide.
Carbon Neutral	The term “carbon neutral” is used in this report in line with the original declaration of a Climate Emergency in Lewisham. Carbon neutrality balances greenhouse gas emissions with carbon removals. As defined by the Committee on Climate Change, a net-zero or carbon neutral target requires “deep reductions in emissions, with any remaining sources offset by removals of CO <sub>2</sub> from the atmosphere”. In the context of Lewisham’s target this means additional carbon removal and storage activity at the borough level or ‘carbon offsets’ funding an equivalent removal outside the borough.
Climate	Climate is usually defined as the average weather, or more rigorously, as a statistical description in terms of the mean and variability of relevant quantities over a period of time ranging from months to thousands or millions of years. The relevant quantities are most often surface variables such as temperature, precipitation, and wind.
Climate Change	Climate change, as used by the United Nations International Panel on Climate Change, refers to a change in the state of the climate that can be identified by changes in the mean and/or the variability of its properties, and that persists for an extended period, typically decades or longer.
Emission-based charging	A charge that depends on the amount of carbon dioxide, nitrogen dioxide, or particulate matter that a vehicle emits. The more harmful substances a vehicle emits, the higher the charge would be to park their vehicle.
Nitrogen Dioxide (NO <sub>2</sub> )	Reddish-brown poisonous gas that occurs commonly as an air pollutant. It is formed when fossil fuels such as coal, oil, gas or diesel are burned at high temperatures.
Short-stay parking bays	Any Pay & Display bay, whereby the vehicle owner pays for parking based on the amount of time parked in the location. This parking is short-stay either by using PayByPhone or a parking meter. “Short-stay parking bays” and “Pay & Display bays” are used interchangeably in the report.
Particulate Matter (PM)	The sum of all solid and liquid particles suspended in the air, many of which are hazardous. It is made up of a number of components, including acids (such as nitrates and sulphates), organic chemicals, metals, and soil or dust particles.

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## **14. Report author(s) and contact**

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## 15. Appendices

### 15.1. Appendix 1 – Projected income of emission-based short-stay parking for cars

#### Projected income:

LBL Proposed Banding	HMRC banding	(emissions, CO <sub>2</sub> g/km)	% total of Oct 20 transactions	Transactions	Rate	Income	Diesel Surcharge Income	Total Income
1	1	0	6%	2337	£1.50	£3,505.32	£1,159.09	£4,664.41
		1-100	6%	2337	£1.50	£3,505.32	£1,159.09	£4,664.41
2	2	101-110	7%	2726	£2.00	£5,452.72	£1,352.27	£6,804.99
	3	111-120	14%	5453	£2.00	£10,905.44	£2,704.55	£13,609.99
	4	121-130	11%	4284	£2.00	£8,568.56	£2,125.00	£10,693.56
3	5	131-140	12%	4674	£2.50	£11,684.40	£2,318.18	£14,002.58
	6	141-150	7%	2726	£2.50	£6,815.90	£1,352.27	£8,168.17
	7	151-165	14%	5453	£2.50	£13,631.80	£2,704.55	£16,336.35
4	8	166-175	8%	3116	£3.00	£9,347.52	£1,545.46	£10,892.98
	9	176-185	4%	1558	£3.00	£4,673.76	£772.73	£5,446.49
	10	186-200	6%	2337	£3.00	£7,010.64	£1,159.09	£8,169.73
5	11	201-225	3%	1168	£3.50	£4,089.54	£579.55	£4,669.09
	12	226-255	1%	389	£3.50	£1,363.18	£193.18	£1,556.36
	13	256+	1%	389	£3.50	£1,363.18	£193.18	£1,556.36
		<b>Total</b>	<b>100%</b>	<b>38948</b>	<b>£2.36</b>	<b>£91,917.28</b>	<b>£19,318.21</b>	<b>£111,235.49</b>

#### Example of vehicles that fall into each band:

Band 1:

- Toyota Yaris Hybrid – 84 CO<sub>2</sub>g/km

Band 2:

- Mini Countryman – 129 CO<sub>2</sub>g/km

Band 3:

- VW Passat 2.0 TDI – 151 CO<sub>2</sub>g/km

Band 4:

- Mercedes C Class Saloon – 193 CO<sub>2</sub>g/km

Band 5:

- Range Rover 4.4 Vogue – 278 CO<sub>2</sub>g/km

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## 15.2. Appendix 2 – Benchmarking for motorcycle permits

### Boroughs that require motorcycle resident permits (annual)

London Borough	Annual resident permit	Emission-based
Bexley	£125.00	N
Camden	£69.07	N
City of Westminster	£57.00	N
Enfield	£55 - £330	Y
Hackney	£10.00 - £317.50	Y
Islington*	£33.50	N
Kensington	£18.00	N
Lambeth	£50.06	N
Sutton	£40 - £110	Y
Tower Hamlets	£20.00	N
Waltham Forest	£35 - £145	Y

### Average price of boroughs that require motorcycle resident permits (annual – average emission-based calculated)

London Borough	Annual resident permit	Emission-based
Bexley	£125.00	N
Camden	£69.07	N
City of Westminster	£57.00	N
Enfield	£192.50	Y
Hackney	£163.50	Y
Islington*	£33.50	N
Kensington	£18.00	N
Lambeth	£50.06	N
Sutton	£75.00	Y
Tower Hamlets	£20.00	N
Waltham Forest	£90.00	Y
<b>Average</b>	<b>£81.24</b>	

### Average of emission-based annual permits ONLY

London Borough	Annual resident permit	Emission-based
Enfield	£192.50	Y
Hackney	£163.50	Y
Sutton	£75.00	Y
Waltham Forest	£90.00	Y
<b>Average</b>	<b>£130.25</b>	

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### 15.3. Appendix 3 – Proposed motorcycle permit charges

Motorbike Resident Permit			
Band	Permit Price (3 months)	Permit Price (6 months)	Permit Price (12 months)
1	£9.00	£17.50	£35.00
2	£11.00	£21.25	£42.50
3	£12.50	£25.00	£50.00
4	£14.50	£28.75	£57.50
5	£16.50	£32.50	£65.00
6	£18.50	£36.25	£72.50
7	£20.00	£40.00	£80.00
8	£22.00	£43.75	£87.50
9	£24.00	£47.50	£95.00
10	£26.00	£51.25	£102.50
11	£27.50	£55.00	£110.00
12	£29.50	£58.75	£117.50
13	£31.50	£62.50	£125.00

Motorcycle Business Permit	
Band	Permit Price (12 months)
1	£175.00
2	£200.00
3	£225.00
4	£250.00
5	£275.00
6	£300.00
7	£325.00
8	£350.00
9	£375.00
10	£400.00
11	£425.00
12	£450.00
13	£475.00

Motorcycle Business Permit (All-Zone)	
Band	Permit Price (12 months)
1	£325.00
2	£350.00
3	£375.00
4	£400.00
5	£425.00
6	£450.00
7	£475.00
8	£500.00
9	£525.00
10	£550.00
11	£575.00
12	£600.00
13	£625.00

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Motorcycle Health Permits	
Band	Permit Price (12 months)
1	£35.00
2	£42.50
3	£50.00
4	£57.50
5	£65.00
6	£72.50
7	£80.00
8	£87.50
9	£95.00
10	£102.50
11	£110.00
12	£117.50
13	£125.00

Motorcycle Business Staff Permits	
Band	Permit Price (12 months)
1	£175.00
2	£200.00
3	£225.00
4	£250.00
5	£275.00
6	£300.00
7	£325.00
8	£350.00
9	£375.00
10	£400.00
11	£425.00
12	£450.00
13	£475.00

Motorcycle Hospital Health Permits	
Band	Permit Price (12 months)
1	£175.00
2	£200.00
3	£225.00
4	£250.00
5	£275.00
6	£300.00
7	£325.00
8	£350.00
9	£375.00
10	£400.00
11	£425.00
12	£450.00
13	£475.00

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Motorcycle Visitor Permits	
Type	Price
1-hour voucher	£0.80
Book of 10 x 1-hour vouchers	£8.00
5-hour voucher	£1.60
1-day voucher	£3.20
1-week voucher	£12.80

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## 15.4. Appendix 4 – Operational Pay & Display machines in the borough

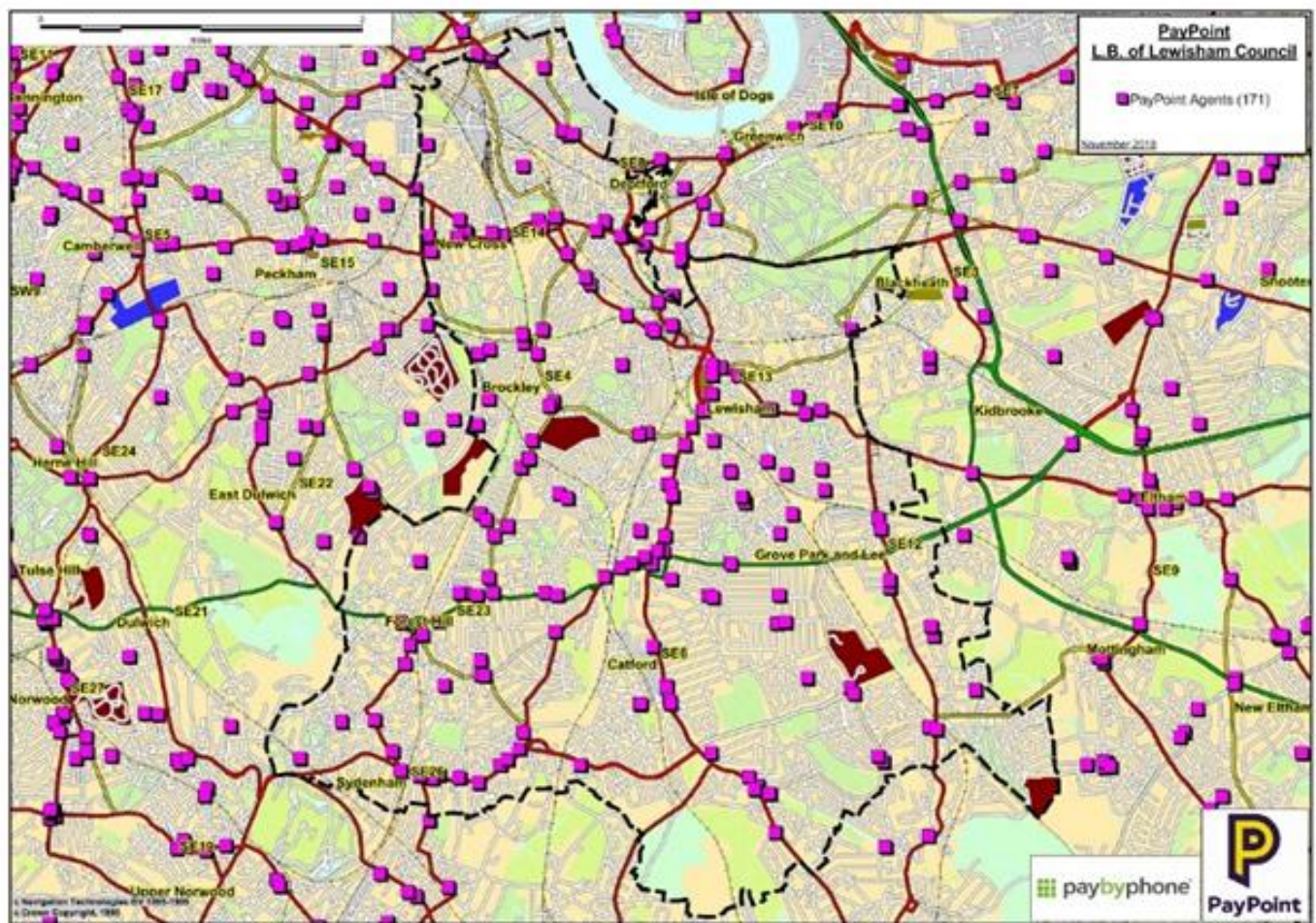
S/N	TYP	LOCATION	NUMB	ELE	SOL	COMMEN	TYPE	STATUS	Latitude	Longitude
1	Car Park	BLACKHEATH GROVE CAR PARK	BLG01	YES			IPS retrofit	LIVE CURRENTLY	51.461009	-0.014498
2	Car Park	BECKENHAM PLACE PARK	LB06		YES		PARKEON NEW SDA	LIVE CURRENTLY	51.274915	-0.524906
3	Car Park	BECKENHAM PLACE PARK	BPP1		YES		IPS NEW MACHINE	LIVE CURRENTLY	51.274915	-0.524906
4	Car Park	CLARENDON RISE CAR PARK	01R	YES			ACCENT S3	LIVE CURRENTLY	51.461120	-0.008592
5	Car Park	CLARENDON RISE CAR PARK	02R		YES		ACCENT S2	LIVE CURRENTLY	51.461120	-0.008592
6	Car Park	CLARENDON RISE CAR PARK	CR1		YES		IPS NEW MACHINE	LIVE CURRENTLY	51.461120	-0.008592
7	Car Park	GIRTON ROAD CAR PARK	01G		YES		ACCENT S2	LIVE CURRENTLY	51.425365	-0.04948
8	Car Park	GIRTON ROAD CAR PARK	LB07		YES		PARKEON NEW SDA	LIVE CURRENTLY	51.425365	-0.04948
9	Car Park	HOLBEACH ROAD CAR PARK	HOL01		YES		AURA	LIVE CURRENTLY	51.446975	-0.020445
10	Car Park	HOLBEACH ROAD CAR PARK	H1		YES		IPS NEW MACHINE	LIVE CURRENTLY	51.446975	-0.020445
11	Car Park	MOLESWORTH STREET CAR PARK	01M	YES			ACCENT	LIVE CURRENTLY	51.461866	-0.01326
12	Car Park	PEARCEFIELD AVENUE CAR PARK	01P		YES		AURA	LIVE CURRENTLY	51.440716	-0.055356
13	Car Park	PEARCEFIELD AVENUE CAR PARK	02P		YES		ACC ENT S2	LIVE CURRENTLY	51.440716	-0.055356
14	Car Park	PERRY VALE CAR PARK	PV1	YES			ACCENT	LIVE CURRENTLY	51.438398	-0.025882
15	Car Park	SLAITHWAITE ROAD CAR PARK	01S	YES			ACCENT	LIVE CURRENTLY	51.458272	-0.01322
16	Car Park	SLAITHWAITE ROAD CAR PARK	02S	YES			ACCENT	LIVE CURRENTLY	51.458272	-0.01322
17	Car Park	THOMAS LANE CAR PARK	01T	YES			ACCENT	LIVE CURRENTLY	51.445627	-0.022125
18	Car Park	THOMAS LANE CAR PARK	02TL	YES			ACCENT	LIVE CURRENTLY	51.445627	-0.022125
19	Car Park	VANGUARD STREET CAR PARK	01V		YES		AURA	LIVE CURRENTLY	51.474203	-0.026433
20	On Street	ALBACORE CRESCENT	R10	YES			ACCENT	LIVE CURRENTLY	51.451581	-0.019769
21	On Street	ALBION WAY	LEW42	YES			ACCENT	LIVE CURRENTLY	51.460759	-0.008975
22	On Street	ALBION WAY	AW1		YES		IPS NEW MACHINE	LIVE CURRENTLY	51.460759	-0.008975
23	On Street	ALDWORTH GROVE	L22	YES			ACCENT	LIVE CURRENTLY	51.451297	-0.014622
24	On Street	ALL SAINTS DRIVE	1AS	YES			ACCENT	LIVE CURRENTLY	51.468005	0.007615
25	On Street	ALL SAINTS DRIVE	2AS	YES			ACCENT	LIVE CURRENTLY	51.468005	0.007615
26	On Street	BEACON ROAD	H16	YES			ACCENT	LIVE CURRENTLY	51.451538	-0.004292
27	On Street	BELMONT HILL	LEW57	YES			ACCENT	LIVE CURRENTLY	51.462949	-0.007734
28	On Street	BELMONT PARK	LEW48	YES			ACCENT	LIVE CURRENTLY	51.460378	-0.000818
29	On Street	BELMONT PARK	LEW50	YES			ACCENT	LIVE CURRENTLY	51.460378	-0.000818
30	On Street	BONFIELD ROAD	LEW06	YES			ACCENT	LIVE CURRENTLY	51.459715	-0.008000
31	On Street	BONFIELD ROAD	LEW10	YES			ACCENT	LIVE CURRENTLY	51.459715	-0.008000
32	On Street	BRADGATE ROAD	R22		YES		ACCENT S3	LIVE CURRENTLY	51.448912	-0.020384
33	On Street	CLARENDON RISE	LEW16	YES			ACCENT	LIVE CURRENTLY	51.460363	-0.007813
34	On Street	CLARENDON RISE	LEW17	YES			ACCENT	LIVE CURRENTLY	51.460363	-0.007813
35	On Street	CRESSINGHAM ROAD	LEW69	YES			ACCENT	LIVE CURRENTLY	51.464614	-0.008761
36	On Street	GEORGE LANE	L26	YES			ACCENT	LIVE CURRENTLY	51.450528	-0.01875
37	On Street	GILMORE ROAD	LEW13	YES			ACCENT	LIVE CURRENTLY	51.459393	-0.006121
38	On Street	GOFFERS ROAD	B18	YES			ACCENT	LIVE CURRENTLY	51.470036	0.001925
39	On Street	GRANVILLE GROVE	LEW66	YES			ACCENT	LIVE CURRENTLY	51.463850	-0.008616
40	On Street	HARE & BILLET ROAD	B19	YES			ACCENT	LIVE CURRENTLY	51.469539	-0.000887
41	On Street	HOLBEACH ROAD	R16	YES			ACCENT	LIVE CURRENTLY	51.447287	-0.022491
42	On Street	HONLEY ROAD	L33	YES			ACCENT	LIVE CURRENTLY	51.447393	-0.014842
43	On Street	LANIER ROAD	L52		YES		ACCENT S3	LIVE CURRENTLY	51.451859	-0.007830
44	On Street	LEE PARK	1LP	YES			ACCENT	LIVE CURRENTLY	51.461636	0.007848
45	On Street	LEE TERRACE	1LT	YES			ACCENT	LIVE CURRENTLY	51.463541	0.004275
46	On Street	LEWISHAM PARK	L02	YES			ACCENT	LIVE CURRENTLY	51.454048	-0.013541
47	On Street	LEWISHAM PARK	L04	YES			ACCENT	LIVE CURRENTLY	51.454048	-0.013541
48	On Street	LEWISHAM PARK	L06	YES			ACCENT	LIVE CURRENTLY	51.454048	-0.013541
49	On Street	LEWISHAM PARK	L12	YES			ACCENT	LIVE CURRENTLY	51.454048	-0.013541
50	On Street	LOCKMEAD ROAD	LEW65	YES			ACCENT	LIVE CURRENTLY	51.463725	-0.008610
51	On Street	MONTPELIER VALE	2MV	YES			ACCENT	LIVE CURRENTLY	51.466811	0.008562
52	On Street	MORENA STREET	R17	YES			ACCENT	LIVE CURRENTLY	51.447470	-0.020400
53	On Street	ROYAL PARADE	1RP	YES			ACCENT	LIVE CURRENTLY	51.467703	0.007695
54	On Street	SLAITHWAITE ROAD	LEW36	YES			ACCENT	LIVE CURRENTLY	51.458359	-0.009711
55	On Street	SOUTH ROW	B29		YES		AURA	LIVE CURRENTLY	51.469871	0.013005
56	On Street	ST STEPHEN GROVE	LEW68	YES			ACCENT	LIVE CURRENTLY	51.463964	-0.010180
57	On Street	THOMAS LANE	R19	YES			ACCENT	LIVE CURRENTLY	51.445949	-0.022832
58	On Street	TRANQUIL VALE	1TV	YES			ACCENT	LIVE CURRENTLY	51.467135	0.006477
59	On Street	WEAR SIDE ROAD	LEW35	YES			ACCENT	LIVE CURRENTLY	51.458002	-0.016087
60	On Street	WHITBURN ROAD	LEW32	YES			ACCENT	LIVE CURRENTLY	51.457627	-0.015116
61	On Street	Manor Lane	F10		YES		PARKEON SDA	LIVE CURRENTLY	51.451621	0.005693
62	On Street	Manor Lane	F11		YES		PARKEON SDA	LIVE CURRENTLY	51.450910	0.005946
63	On Street	FRANKHAM STREET	S01		YES		PARKEON SDA	LIVE CURRENTLY	51.477276	-0.024441
64	On Street	FRANKHAM STREET	S03		YES		PARKEON SDA	LIVE CURRENTLY	51.477276	-0.024441
65	On Street	FRANKHAM STREET	LB04		YES		PARKEON NEW SDA	LIVE CURRENTLY	51.477276	-0.024441
66	On Street	MALYON'S ROAD	T4		YES		PARKEON SDA	LIVE CURRENTLY	51.454025	-0.021379

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15.5. Appendix 5 – 171 pay point locations in the borough



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## 15.6. Appendix 6 – Draft Equalities Analysis Assessment

<b>Author</b>	Seamus Adams, Xyra Davies	<b>Directorate</b>	Public Realm
<b>Date</b>	TBC	<b>Service</b>	Parking

**1. The project or decision that this assessment is being undertaken for**

This Equalities Analysis Assessment is being completed as part of the proposal to implement new emission-based parking charges within the borough and will feed into the Cabinet Report that proposes these changes.

The two main proposals within the Cabinet Report are:

- To implement emission-based charging to park in Pay & Display bays throughout the borough;
- To implement motorcycle resident and business permits.

The aims of these proposals are to encourage the uptake of less polluting vehicles, which will reduce carbon emissions in the borough, and therefore improve Lewisham's air quality. This will have a general positive impact on those living in the borough.

However, this Equalities Analysis Assessment will determine whether the changes to the parking charges from a standard rate to an emission-based rate will impact those within protected characteristic groups, those with lower incomes, and motorcycle users.

**2. The protected characteristics or other equalities factors potentially impacted by this decision**

<input checked="" type="checkbox"/> Age	<input type="checkbox"/> Ethnicity	<input type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input checked="" type="checkbox"/> Other, please define: <b>motorcyclists</b>
<input type="checkbox"/> Gender	<input type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input type="checkbox"/> Religion	<input type="checkbox"/> Carer status	<input type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	

**Age**

Age refers to a person belonging to a particular age or age range. As an employer and a provider of services the Council is required to ensure that it does not unlawfully discriminate against a person on account of their age. A summary of data on age is set out in the box below.

Data summary for age
<ul style="list-style-type: none"> <li>• our data profile on the age of Lewisham's population (based on official statistics) shows that some 65,000 residents are aged between 0-19 years (25 per cent of the population);</li> <li>• in contrast men and women aged over 60 total some 41,400 (15.5 per cent of the population);</li> <li>• official statistics also show that by 2021 residents aged 30-44 will still be the most numerous, however those aged between 50-69 will see the biggest increase in their numbers (up from 16 per cent in 2011 to 19 per cent of the overall population in 2021);</li> <li>• the Council's workforce profile for 2010-11 reveals that 35 per cent of Council employees are aged between 45-54; 23 per cent are aged between 35-44; 22 per cent are aged 55 or over; 16 per cent are aged between 25-34 and 2 per cent are aged between 16-20.</li> </ul>

As the Council proposes to move towards a cashless payment system, Members have previously indicated that they wish to retain parking machines in a number of areas. This would enable those who do not possess a smart phone, and therefore cannot use the Pay & Display parking app to purchase parking, to continue to pay for parking easily.

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The Office for National Statistics carried out a survey regarding mobile phone usage<sup>6</sup>. Figure 1 in the report shows that it is more likely that those aged 64 to 74 and aged 75 and over would not have a mobile phone. It must be noted that this study was carried out in 2013, and technology has significantly advanced since then. However, it cannot be ignored that those within older age groups may not have a mobile phone, and therefore must be considered in the move towards a cashless system.

Considering this would ensure that the Council is advancing equality of opportunity between those within an older age group, and those within younger age groups.

### **Disability**

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. A summary of data on disability is set out in the box below.

#### **Data summary for disability**

- Lewisham's data file on disability is based on the 2001 Census data, which showed that 15.6 per cent of the borough's population (38,824 people) had a long-term illness (proxy for disability), which limited daily activities or the work they could do;
- this figure is slightly higher than the London average of 15.5 per cent, but significantly lower than the national average of 18.2 per cent;
- the 2001 Census also recorded over a quarter of households in Lewisham (29.4 per cent) contain one or more people with a limiting long-term illness or disability, which is lower than the average for England and Wales as a whole where the proportion is 34 per cent;
- according to the 2001 Census, more women than men in Lewisham have a 'long-term limiting illness'. Going forward, it is reasonable to conclude that as people get older the proportion of Lewisham residents who have a long term illness is also likely to increase;
- in November 2010, 13,050 people in Lewisham were claiming Disability Living Allowance, of which 15.5 per cent had been claiming for less than two years (8.3 per cent claiming for 1-2 years), 19.3 per cent had been claiming for 2-5 years and 65.3 per cent of claimants had been claiming for over 5 years;
- there was very little different in the number of male and female Disability Living Allowance claimants. 14.2 per cent of claimants were children under the age of 16 and 67.7 per cent of claimants were of working age (16-64);
- the Council's workforce profile for 2010-11 reveals that 6 per cent of employees identify themselves as having a disability.

The Council must consider those with a disability when implementing emission-based paid for parking and motorcycle permits.

Blue Badge holders can park in Pay & Display bays for free throughout the borough of Lewisham. It would need to be considered whether this would still be the case when emission-based paid for parking is implemented, and if this was to change for Blue Badge holders, this would have a negative impact on this protected characteristics group.

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<sup>6</sup> [Mobile Phone Usage Survey, Office for National Statistics](#)

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Motorists with a Blue Badge who use motorcycles would also need to be considered, as it would need to be considered whether they would continue to receive free motorcycle permits, or whether a Disabled Resident Motorcycle Permit would be implemented.

### **Other protected characteristic groups**

The above selected groups are the ones who will be the most affected by the proposed actions.

The impact on those who are not selected would be based on whether they frequently pay to park a vehicle in the borough or drive a motorcycle and would not be based on their protected characteristic. Therefore, the proposals would not have a specific positive or negative impact based on their belonging to that specific characteristic.

### **Income**

When considering income as a factor, we would need to consider that those in lower income households may be affected more by the proposed changes than those in higher income households.

The Single Equality Framework 2020-24 Data Sift<sup>7</sup> states that 10.5% of households in the borough are workless, and 9.3% claim Universal Credit, which is higher than that in London and Great Britain.

The overall effect on those in lower income households would be positive, in that air quality in some of the most congested areas in the borough is expected to improve.

However, it could be possible that lower income households have an older car that may emit more carbon dioxide, and therefore would cost more to park in Pay & Display parking bays based on their emissions. This would create a negative impact for this group.

In the absence of concrete evidence of the above, this could be seen as unconscious bias, and consultation – perhaps a survey – would need to be undertaken to gather the full picture of how the proposed changes might affect those with lower incomes.

### **Language spoken**

The Single Equality Framework 2020-24 states that there are 170 languages spoken in the borough, with 20% of the borough stating that English is not their main language<sup>8</sup>. Therefore, it must be considered during consultation that a proportion of the borough do not speak English as their main language.

It must be ensured that the proposals are communicated effectively to these residents. Motorcycle users whose main language is not English will need to be particularly considered, as they will be going from parking free of charge to purchasing a resident or business permit, or paid for parking.

A survey, whereby we ask resident motorcycle users whether English is their main language, could help to prepare for this eventuality.

### **Motorcyclist groups**

Motorcyclists currently park for free in resident bays and Pay & Display bays throughout the borough<sup>9</sup>. The proposed changes to implement motorcycle permits and paid for parking would have a significant impact on motorcyclists in the borough, as they would be expected to pay for parking.

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<sup>7</sup> [Single Equality Framework 2020-24 Data Sift PDF document can be found on Council website page](#)

<sup>8</sup> [Single Equality Framework 2020-24 PDF document can be found on Council web page](#)

<sup>9</sup> [Motorcycle Parking in Lewisham Borough](#)

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The parking service will carry out a borough-wide consultation in order to receive the views of key internal and external stakeholders, including key motorcycle activist groups. The consultation will start in June 2021 for a period of 12 weeks.

Motorcycle groups will have a large, vested interest in these proposals, and robust consultation with them and any objections to the proposals will need to be considered to ensure the proposals meet the needs of the motorcyclist along with residents, businesses, and the Council's ambitions to reduce emissions in the borough.

Key motorcycle groups to consider throughout the borough will be:

- Businesses that utilise motorcycles – companies that rely on motorcycles to deliver food e.g., Deliveroo, Just Eat, pizza delivery
- Visiting motorcyclists
- Vehicle permit holders – particularly motorcycle retail businesses

#### **Other groups to consider during motorcycle permit consultation**

Individuals that are not within the protected characteristic groups, but may be affected by the proposed changes, must be considered and consulted. The implementation of emission-based charging for Pay & Display bays would also affect the following groups:

- Council staff – including those who drive a motorcycle to work
- All vehicle permit holders
- Metropolitan police
- Department for Transport
- Transport for London
- APCOA
- Resident Tenant Associations
- NHS/University Hospital Lewisham

The above groups should be considered during consultation as key internal and external stakeholders, and the considerable changes to the charging for paid for parking and motorcyclists must be communicated and consulted with these groups, as well as the protected characteristic groups, and the other groups listed above.

#### **Conclusion**

The overall effects on the above groups are expected to be positive, particularly in that the proposed changes aim to improve the health and wellbeing of those within the borough. As stated in the Single Equality Framework 2020-24, one of the Council's objectives is to "improve the quality of life of residents by tackling preventable illnesses and diseases".

It could be argued that lung disease and coronary disease caused by pollution are preventable, and the proposed changes are aligning with the Council's wider objectives to improve the quality of life of its residents.

The above groups may be significantly impacted by the way in which the Council proposes to implement these changes, and these groups will form the basis of our data collection through consultation.

#### **3. The evidence to support the analysis**

Here you need to provide relevant information explaining what evidence you have. This may be user records, a recent consultation, etc. Where possible you should include data which you can then use to evidence your findings.

- What we found out about the groups of particular focus – age, disability, income, language spoken, motorcyclist groups, other internal and external stakeholders
- Consultations: August
- User records

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- Data: everything collected from research

You should then provide a summary of the findings.

- Findings within the data summary

#### 4. The analysis

Here you should provide an explanation for the findings. Identify what it tells you along with what it doesn't. If you feel like you can't necessarily account for some of the findings, try to explain why and what would help in the future.

The analysis you undertake should address the characteristics you identified in the **step 2** and the possible impacts of the decision or project identified in **step 1**, using the findings of **step 3**.

- What findings tell us about the impact on those groups above
- What the findings don't tell us

#### 5. Impact summary

Here you should provide a summary of the above, stating what the impact is on each characteristics (positive, negative, mixed or neutral). You should consider the cumulative impact of your proposal where there is any related service change that is taking place in other areas of the Council's work which might compound any negative impacts.

- Summary of the impacts on the groups outlined above (positive, negative, mixed, neutral)
- Any other service changes that could mitigate negative impacts?

#### 6. Mitigation

Here you need to propose action to mitigate against any negative impacts identified. This action should be reasonable and proportionate, and should consider the displacement of the service user to other services or crisis points arising from changes you have proposed.

- Action to mitigate for groups
  - Age – pay points in shops for cash payments for P&D
  - Disability – free P&D parking
  - Socioeconomic
  - Motorcycle users – robust consultation, take into consideration results from consultations, balance with Council's objectives
  - Other groups (address any other group impacts we did not foresee) – take into consideration consultation results, balance with Council's objectives
- Consider displacement of users to other services or crisis points arising from changes proposed
  - NHS, shops providing pay point access

#### 7. Service user journey that this decision or project impacts

Service users, particularly motorcyclists who would be expected to purchase a permit, can email [lewishamparkingpermits@nslservices.co.uk](mailto:lewishamparkingpermits@nslservices.co.uk) for assistance in purchasing a permit. They may also submit any queries to this email address, and a Customer Service Officer will respond to them.

For any queries regarding emission-based paid for parking, the parking complaints team can provide information for customers. The [complaints portal](#) provides the option to select the parking department, which will ensure that the complaint or query reaches the correct department.

The relevant pages on the Council website will be updated, including the "[Motorcycle Parking](#)" page. We could also add dedicated FAQs pages for motorcyclists, and information and FAQs pages for emission-based paid for parking.

Information regarding these changes would need to be communicated to the parking contractor NSL, and training would need to be provided to ensure that all staff are aware of the intended changes, if they are agreed upon.

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This includes the on-street team, the Customer Service Officers (both for PCNs and permits), and the parking complaints team.

This section should also inform the assessment of the cumulative impact of Council savings proposals.

- Council savings proposals?  
<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=133&MId=6305>

<b>Signature of Head of Service</b>	
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**16.**

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